



January 5, 2022

VIA FEDEX AND CERTIFIED UNITED STATES MAIL

Merrick B. Garland
Attorney General of the United States
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

[cc list attached]

Re: Pornography in Minor-Accessible School Libraries

Dear Mr. Garland:

I am Elana Fishbein, Founder and President of the non-profit No Left Turn in Education, serving parents, parent groups, and other stakeholders from public, sectarian (including Catholic, Christian and Jewish), and nonsectarian private schools, dedicated to the preservation of our nation's founding liberal constitutional principles. We seek to elevate classroom teaching and ensure its contribution to civic virtue and civility. Part of civic virtue is adherence to the law, respect for institutions, and becoming in the traditionally liberal sense, wise and inquisitive citizens. No Left Turn in Education is headquartered in suburban Philadelphia, with diverse Board members and chapter representatives from across the country, consisting of both Republicans and Democrats. I hold bachelor's, masters and doctoral degrees in social work from the Hebrew University, Rutgers University, and the University of Pennsylvania, respectively. I specialized in child welfare, with a focus on child abuse and neglect.

I write now on an urgent public elementary and secondary education matter that has now edged into depravity actionable under the law. It is the availability of pornography to children in schools and libraries, provided to them under any of a number of false covers, including literature and health education. Our organization does not question legitimate health education (including sex education) based on genuine community consensus, including parental consent and input. This letter addresses the illegitimate offered as legitimate: graphic content that is by any measure obscene, particularly where *children* are targeted as the *intended* recipients. We ask you to dedicate all appropriate resources of your Department to pursue, contain, and ultimately eliminate the distribution of pornography in public institutions serving minors. I outline below several legal theories available to the Department (Part II), based on input received from multiple respected sources. I turn first, however, to the problem at hand (Part I).

Before doing so, I share this: I recognize that significant, powerful and wealthy institutional sources in our country fund and promote these teachings, but power does not legitimize what is happening. We urge you to stand tall against power and act with all due haste to protect the children of our country.

I. BACKGROUND

By depravity, I refer to the accessibility in schools of explicit and sexually-charged books and related forms of information used in schools. Minors are the *intended* audience for obscene and plainly pornographic content and visual graphics found in various book forms, in online curricula and library systems, in open resource material used by teachers without any check or balance, and many other forms of access which in some cases are *designed* to evade scrutiny, particularly scrutiny by parents and guardians. Into this latter category fall many access points designed to shape *children* into embracing and then normalizing crudity and adult-minor depravity. Regularly offered in the “safe” and innocuous setting of the classroom or library, graphic sexual information ultimately desensitizes children, in turn causing grave and dangerous confusion in resisting predation. While pornography for adults depicting adults may struggle for reliable legal description, there is no such ambiguity when the intended targets are *minors*.¹

In any other setting, an adult providing access to children of materials so explicit would properly be classified as an abuser, a harasser, or even a groomer of the minor for the purposes of sex. *Accessibility* in many places across the country has now veered into active *proselytization*, bearing all of the marks of a quasi-religious creed, having its own language, behavioral codes, and even rituals. In targeting *minors* from kindergarten to 12th grade, this deliberate and focal movement within schools involves direct and calculated manipulations of minors, a demographic long recognized by multiple legal precedents as not having the capacity to form legal consent of any kind, whether consent to sexual activity or consent to civil contracts. Thus, minors by multiple applicable laws *cannot* be deemed to consent to the infusion of aggressive and explicit sexual content into their classrooms. Furthermore, the strong trend responsible for bringing this to classrooms of minors also has as a recurring feature the bypassing of parents.

Minors have their own courts precisely because their minds are not deemed fully formed. Myriad special laws protect them. Relevant here are those federal and state laws that protect minors against sexual predation, including by teachers, librarians, administrators, and school boards.

What is occurring across the country has now become actionable, whether by appropriate forces of government, such as your Department, or by parents who seek redress for the predation of

¹ For purposes of convenience and clarity in this letter, I refer to this compendium of sources as “books and materials,” sometimes just “books” (where that is the particular medium), and sometimes “materials,” in order to capture all that is directly objectionable. My goal is to pre-emptively counter the now common defenses that the content is either not being taught (refuted by direct evidence that it is) or that it is not as graphic as depicted (refuted by direct excerpts).

their children under color of state law – a reference (as I am sure you will understand) to 42 United States Code § 1983, forbidding state actors from acting to deny constitutional rights. The profound intensification of predation and proselytization efforts across the country, occurring in publicly-funded elementary and secondary schools, has constitutional and statutory consequences. Before turning to what those are, I provide first an appropriate summary about this content. The effect will be to place you and your office on notice of the full compendium of pornography now being forced on minors in publicly funded schools. Minors cannot, of course, consent to it. While parental involvement could be mitigating, parents are deliberately excluded from the processes that bring these explicit, exploitive and manipulative materials into the classroom. Further methodologies are deployed *precisely* to evade parental scrutiny. Placing mention of the materials where parents might detect them (syllabi, published curricula) is avoided in favor of classroom handouts and other de-formalized forms of distribution. Many administrators and educators have gone on record *against* parental involvement.

Summarized below are examples of published works now widely available to minors both in their public school libraries and in public school classroom teaching, from ages 4 and up. In other words, before children even know how to write their names, add or subtract, they are being force-fed a curriculum that demands they sexualize themselves and the world around them.

These materials have infiltrated into multiple schools and their accessible databases, with the *purpose* of reaching minors. Whether assessed by access point or by title, the infusion and proliferation of these materials has become a public menace, a threat to minor safety, a disruption to minor mental health, and an all-out assault against the rights of parents to be the first educators of their children, assured by international law (Universal Declaration of Human Rights), federal law (20 U.S. Code § 3401), and (for a faith-based example) Catholic Canon Law (*see, e.g.,* Canons 774 § 2, 776, 796 § 2; *see also Gravissimum educationis* 23 [“parents must be acknowledged as the first and foremost educators of their children”].)

The depth and breadth of these commands to parental primacy demonstrate the consensus of civilization that parents cannot be bypassed.

But they repeatedly are, and it is not difficult to understand why. It is because these teachings are insidious, predatory, pornographic and manipulative. Parents would not widely support them, and certainly not if due care were taken to fully expose and reveal them. While schools sometimes pay lip service to accepting individual parent concerns, the far more common experience is that parents know almost nothing about these teachings, much less that they are being presented as positive and enriching to their minor children.

The widespread use of these materials does not excuse them. This merely demonstrates how entrenched they have become within public institutions, all while evading parent radar. Wide exposure only came with pandemic-related distance learning. Parents discovered that their minor children were being burdened with wide sexualization of their academic experience, down to even the earliest school ages.

Following are just samples, including (where informative) their sponsoring publicly-funded institutions:

- **Loudon County (Virginia) Public School libraries:**
 - “*It Feels So Good To Be Yourself*,” by Theresa Thorn, identified as for ages from 4 to 8. The book uses age inappropriate concepts and phrasings to *deliberately* insert skepticism into minor minds about their own gender, asking that they consider and use terms like “cisgender,” “transgender,” and “non-binary.” Intended for ages 4 and up, the author explicitly presents it as being for “trans kids,” non-binary kids,” “gender fluid kids,” and “gender expansive kids.” Demanding that a child of 4 consider that that he or she may actually be neither male nor female is profoundly age-inappropriate, not the business of the school, and an appropriate discussion for parents in consultation with properly qualified clinical professionals.
- **Colorado Library Consortium** is a publicly funded consortium of school libraries in Colorado:
 - The consortium contracts with EBSCO (diminutive of Elton B. Stephens Company), which then provides instant student-access to its databases by all consortium member schools. While maintaining in public statements that its student access is “age-appropriate” for minors aged 5 to 18, EBSCO and its consortium schools facilitates immediate minor student access to explicitly sexual content while also providing links to external sites promoting sex toys and multiple forms of adult sexual activity, all at taxpayer expense and without parental involvement or consent.
- **New Trier Township High School District 203, Winnetka, Illinois:**
 - “*Two Boys Kissing*,” by David Levithan. Of 196-pages, 44 pages use the word “fuck,” and 3 of those involve explicit sex between the characters. The book is required reading for honors English at this particular school. As with many books and materials of this genre, the widespread presence of this book in schools is not due to spontaneously occurring grassroots popularity, but from publishing houses and other adult sources.
- “***All Boys Aren’t Blue***,” described in promotional literature as “a primer for teens eager to be allies as well as a reassuring testimony for young queer men of color” (emphasis added) includes content like this:
 - Page 201: “You were fully erect at this point. You can’t tell anyone, ok? I promised. You grabbed my hand and made me touch it”.
 - Page 202: “By now we were both touching each other. Tried my best not to enjoy it because you were my cousin. We were crossing a line that family shouldn’t cross”.
 - Page 204: “You told me to take off my pajama pants, which I did. You then took off your shorts followed by your boxers. Then you stood in front of me fully erect and said, Taste it. At first, I laughed and refused. But then you said, come on Matt, taste it. This is what boys like us do when we like each other. I finally listened to you. Then you got down on your knees and told me to close my eyes. That’s when you began oral sex on me as well”.

- *Pages 204-205: “You then laid me on the ground and got on top of me. You began humping me back and forth. You got up off me and told me to come to the bathroom. You began stroking yourself in front of me. Then you began to moan slightly. You ejaculated into the toilet”.*
- *Pages 267-268: “I got behind him. For the first few minutes, we dry humped and grinded. I was behind him, with my stomach on his back as we kissed. After a few minutes, he got up and went to this nightstand, where he pulled out a condom and some lube. He then lay down on his stomach. I knew what I had to do even if I had never done it before. I had one point of reference though, and that was the 7+ years of watching porn. I remember the condom was blue and flavored like cotton candy. I put on some lube and got him up on his knees and I began to slide into him from behind. I eased in slowly until I heard him moan. I finally came and let out a loud moan to the point where he asked me to quiet down for the neighbors”.*
- *Pages 270-271: “We took each other’s clothes off, fast but deliberate. After he told me to lie down on the bed. He asked me to turn over while he slipped a condom on himself. There is a fear as with most things you are doing for the first time. But this was my ass and I was struggling to imagine someone inside of me, and he was big.”*
- ***Fun Home, a Family Tragicomedy***, by Allison Bechdel, is a so-called graphic novel, primarily consisting of pictures with some text. In this example, the pictures repeatedly present graphically depicted sexual acts, with phrasing that matches the explicit depictions. This is intended for readers 15 and up. Graphic excerpts directly from the book are contained in ***Attachment A***.
- ***Lawn Boy***, by Jonathan Evison, is explicit, involves pedophilia (pubescent and pre-pubescent sexual activity) and ephebophilia (late pubescent sexual activity), and like all of its kindred books and materials has obtained the imprimatur of the Young Adult Library Services division of the American Library Association, which helps explain how so many of these books come to be carried in schools. Content includes:
 - *Page 19: “Not that it really matters, in fourth grade at a church youth group meeting out in the bushes, I touched Doug Goebbels’ d**k, and he touched mine. In fact, there was even some mouths involved.”*
 - *Page 91: “What if I told you I touched another guy’s d**k? What if I told you I sucked it? I was ten years old, but it’s true. I put Doug Goebbels’ d**k in my mouth. I was in fourth grade, it was no big deal. He sucked mine too. And you know what, it wasn’t terrible.”*
 - *Page 174: “He talked about all times at the church but never mentioned our penises, or the fact that he never said ten words to me after our little foray in the bushes. Not a single reference to holding or tugging or sucking d**ks. All I could think about while he was chatting me up, was his little salamander between my fourth-grade fingers, rapidly engorging with blood.”*
 - *Page 230: “Why won’t you admit we suck each other’s d**ks? We shared a HERSHEY’s Bar, then you showed me your d**k. The next thing I know it’s in my mouth. We suck each other’s d**ks and you’re pretending it didn’t happen.”*
- ***Gender Queer: A Memoir***, by Maia Kobabe, is also explicit, and also involves pedophilia and ephebophilia. While its Amazon online description states it is intended for ages 18 and up, it is widely used in high schools, now in check only by parent discovery and the resulting outcry. Defenders have responded by trivializing the complaints, but removing

from their defenses accurate depictions of the content, while vilifying objecting parents. Here is what these defenders are defending:

- Page 62: “For years my standard method of masturbation was stuffing a sock into the front of my pants and manipulating *The Bulge*.”... “This would evolve into hip-thrusting while thinking of my latest gay ship...” “Memorably, I got off once while driving just by rubbing the front of my jeans and imagining getting a blow job.”
- Page 63: “When I finally got old enough to not be embarrassed talking about this stuff with my sister: It really never occurred to you to put something into your vagina, not even a finger? It really didn’t. So you’ve never tasted yourself? What? No! Ew! Wait, you have? Haha, of course! You should try. And so: comic picture shows finger with caption ‘Vagina Slime’.”
- Page 167: “Fast Forward: We’ve been dating for two months. We’ve made out, we’ve had sex, we’ve moved on to sexting at work.” “I got a new strap-on harness today. I can’t wait to put it on you it will fit my favorite dildo perfectly. You’re going to look so hot.” “I can’t wait to have your cock in my mouth – I’m going to give you the blow job of your life then I want you inside me.”
- **Attachment B** contains images from the book.

What should alarm all thoughtful observers is that these books and all related materials containing this content are the works of *adults*, writing explicitly sexual content intended to be read by *minors*, with the written materials then facilitated into *public* libraries and *public* schools by still further *adults* who endorse this kind of sexually explicit manipulation of the young, effectively sexualizing everything about their life experience, even intruding with the manipulation into such unlikely destinations as honors English programs. Indicating the pervasiveness of these materials as insidious tools by which *adults* sexualize and *desensitize children*, the “School Library Journal” described “*All Boys Aren’t Blue*” as like “sitting with an insightful friend.” Other sources promoted the book as an embrace of the ideology of “queerness” (“Bitch Magazine,” and “Publishers Weekly”). These are all *adult* sources promoting sexualization of *minors*, comfortingly described by the adults to the minors as an “insightful friend.”

Bypassing scrutiny altogether, extracts from these books and others like them make their way into classroom hand-outs and related materials, or their objectionable features are hidden from scrutiny. Amazon’s presentation of *Gender Queer* is an example. It presents none of the book’s graphic detail, stating instead that it is influenced by such innocuous-sounding themes as “fairytale, homesickness, and the search for identity.” (See “About the Author,” under Amazon’s entry for *Gender Queer*, accessed January 1, 2022.) Amazon’s product text is written *by the product seller*. In the case of *Gender Queer*, this means that *the seller* elevated traditional themes while omitting any reference to the book’s sexualization of minors, its possible use as a grooming tool by predators, or that the book’s deliberately graphic sexual words and images were prepared by an adult *specifically* for presentation to *minors*.

While any of the pathologies captured in these materials might be the subject of genuine psychology scholarship, that is not the point of any of these materials. Rather, their purpose is to sexualize childhood and villainize parents and value systems who object. In a society that today

wonders why its youth are so unhappy and youth suicides so numerous, these books and materials come as an extremely potent reminder about prevalent *adult* attempts to *normalize* sexualization of our *young*.

II. AVAILABLE LEGAL REMEDIES

Department action. While the Supreme Court has wrestled with the definition of “pornography” when intended for adults, there is no ambiguity when the targets are children. In fact, uniformly in American jurisprudence, a standard akin to strict liability applies, without ambiguity. Children are members of a specially protected class when it comes to sexual exploitation of any kind. Society and the law have long since determined that adults may not sexualize the young. Minors cannot consent to sexual interaction with adults.

Books, classroom materials and handouts, and any other distribution method are every bit as potent an instrument of child abuse as one-to-one in-person exploitation. Books and similar materials, therefore, are subject to precisely the same filter – minor abuse does not become legal because a book or classroom handout is used to do it.

We ask for your promptest action to investigate and, if the facts warrant, to prosecute. Our children are at daily risk.

Section 1470 of Title 18, United States Code, prohibits any individual from knowingly transferring or attempting to transfer obscene matter using the U.S. mail or any means or facility of interstate or foreign commerce to a minor under 16 years of age. Convicted offenders face fines and imprisonment for up to 10 years.

Section 1466A of Title 18, United State Code, makes it illegal for any person to knowingly produce, distribute, receive, or possess with intent to transfer or distribute visual representations, such as drawings, cartoons, or paintings that appear to depict minors engaged in sexually explicit conduct and are deemed obscene. This statute offers an alternative 2-pronged test for obscenity with a lower threshold than adults-only depiction. Matter involving minors can be deemed obscene if it (i) depicts an image that is, or appears to be a minor engaged in graphic bestiality, sadistic or masochistic abuse, or sexual intercourse and (ii) if the image lacks serious literary, artistic, political, or scientific value. A first-time offender convicted under this statute faces fines and at least 5 years to a maximum of 20 years in prison.

We direct your attention to the images we provide. They are, by any measure or standard, covered by one or both of these statutes, *unquestionably*. Matters appear to have gotten well out of hand. The silver lining of the distance learning necessitated by the pandemic is that parents and all thoughtful observers are now aware of these concerted attempts to sexualize their children.

Private (Parental) Rights of Action. Constitutional principles are in play. Because child literature now seeks to inspire cross-gender and other sexual experimentation, public schools run

afoul of religious principles. The teachings of the Catholic Church are particularly emphatic: *there are two genders*. (See, e.g., *Man and Woman: He Created Them* (2019).) What this means is that any government-funded school hosting books and materials so fully contrary to mainstream religious teaching are on a collision course with the First Amendment.

Both the Establishment Clause and the Free Exercise Clause are implicated. How can a faithfully Catholic child be forced to endure in his or her school teachings that the Church says are manifestly wrong, but which are *normalized* and *forcefully advocated* by the school? How can a faithfully Muslim child or Jewish child be coerced into renouncing his or her family's faith (Free Exercise Clause) and accepting the state-sponsored sexualized one (Establishment Clause)?

Adults coercing the consumption of these explicit materials by children do so without clinical justification or certification. These books and their explicitly sexual details (*specifically* targeting minors) do not originate in clinical circumstances designed by the well-informed to guide minor dysfunction. In fact, the proliferation of these books, companion materials, and their ideologies are virtually all traceable to political affinity groups, mimicking predation if the same conduct were being pursued almost anywhere else.

Teachers presenting these materials have the additional distinction of being in authority over these children – the same authority that by statutes and case law is *presumed* to be misused when it comes to the dispensing of sexually explicit communications and messages to minors. The Supreme Court itself has highlighted the vulnerability of the elementary and high school young to proselytization in state-sponsored schools, disallowing it in both. That this new form of proselytization has explicit sex as its central point does not alter the point that it is, indeed, a proselytizing and creed-like belief system.

Teachers, librarians, and administrators once put on notice of the presence of these explicit materials must stop presenting them, or risk civil action by individual parents under Section 1983. These state-funded actors become liable for imposing a creed and ideology repugnant to faithful Catholics, Protestants, Jews, and Muslims, and others implicating both prongs of the First Amendment's religious freedom clauses.

I respectfully direct your attention to the recent *Arnold v. Oliver*, a case arising under Section 1983, and the opinion (concurring in the denial of a rehearing en banc) by Circuit Judge James C. Ho (5th Cir., December 15, 2021) (No. 20-20215):

[N]o legitimate pedagogical interest is served by forcing students to agree with a particular political viewpoint, or by punishing those who refuse. That would offend the First Amendment—as both our court and other circuits across the country have repeatedly recognized. See, e.g., *Brinsdon*, 863 F.3d at 349 (educators may not “seek[] to inculcate [particular political] beliefs”). See also *C.N. v. Ridgewood Bd. of Educ.*, 430 F.3d 159, 187 (3rd Cir. 2005) (“[A] public educational institution may not demand that a student profess beliefs or views with which the student does not agree.”); *Wood v. Arnold*, 915 F.3d 308, 319 (4th

Cir. 2019) (same); *Ward v. Polite*, 667 F.3d 727, 738 (6th Cir. 2012) (“A university cannot compel a student to alter or violate her belief systems . . . as the price for obtaining a degree.”) (citing *Barnette*, 319 U.S. at 342).²

Arnold v. Oliver, at 4 (also citing articles by Kiri Blakeley, “Seventh grader ‘had to say God wasn’t real’ in classroom assignment at her Texas school,” DAILY MAIL, Oct. 28, 2015, and Bruce Schreiner and Gilma Avalos, “Florida school apologizes after students stomp on ‘Jesus’”, NBC News, Mar. 27, 2013).

There is likewise “no legitimate pedagogical purpose” served by presenting sexually explicit materials or sexually ideological materials to minors, by those in positions of state authority, particularly where the movement resulting in this affront to parental authority and religious freedom has become pervasive due to methodologies and processes untraceable by parents.

It became pervasive precisely because parents and all thoughtful people were unaware it was happening, imposed by those in authority to whom children are entrusted for academic formation. That trust has been abused, and that abuse has constitutional significance.

CONCLUSION

This is a crisis! The normalization of child sexual exploitation continues in our publicly-funded schools and libraries, addressed now only because its existence and reach have been so recently understood.

You are obligated by law to protect the public and enforce federal constitutional and statutory law. We ask you now to do so as to these books and materials, in whatever form they are presented to minors. Normalizing sexual childhoods and desensitizing children must stop. Children must be protected. If nothing else, the First Amendment rights to be free of state-sponsored proselytizing and the simultaneous right to be free of burdens on personal worship must be zealously protected.

Very truly yours,



Elana Fishbein
No Left Turn in Education

EF:sl
Attachments
cc: [see attached list]

Merrick B. Garland

January 5, 2022

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cc:

Committees of the United States Senate:

- Committee on Health, Education, Labor, and Pensions
- Committee on Appropriations

United States House of Representatives:

- Committee on Appropriations
- Committee on Education and the Workforce
- Committee on the Judiciary
- Freedom Caucus

Secretaries of the following Departments:

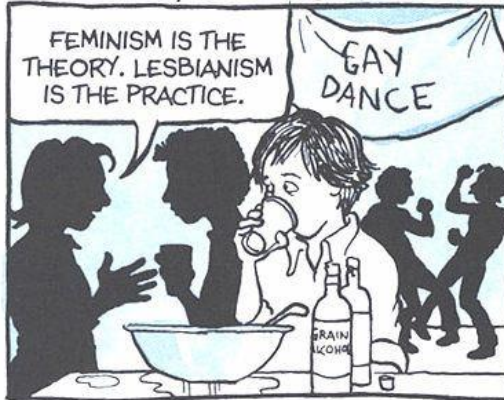
- Secretary of the United States Department of Education
- Secretary of the United States Department of Health and Human Services

Governors, Lieutenant Governors, Attorneys General, Education Heads of the States and Commonwealths

Attachment A

Fun Home, a Family Tragicomedy, by Allison Bechdel

THE NOTION THAT MY SORDID PERSONAL LIFE HAD SOME SORT OF LARGER IMPORT WAS STRANGE, BUT SEDUCTIVE.



AND BY MIDTERM I HAD BEEN SEDUCED COMPLETELY.



JOAN WAS A POET AND A "MATRIARCHIST." I SPENT VERY LITTLE OF THE REMAINING SEMESTER OUTSIDE HER BED.

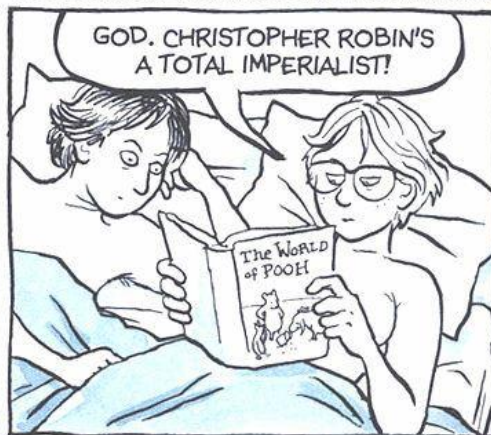


THIS WAS STREWN WITH BOOKS, HOWEVER, IN WHAT WAS FOR ME A NOVEL FUSION OF WORD AND DEED.

I LOST MY BEARINGS. THE DICTIONARY HAD BECOME EROTIC.



SOME OF OUR FAVORITE CHILDHOOD STORIES WERE REVEALED AS PROPAGANDA...



...OTHERS AS PORNOGRAPHY. IN THE HARSH LIGHT OF MY DAWNING FEMINISM, EVERYTHING LOOKED DIFFERENT.



THIS ENTWINED POLITICAL AND SEXUAL AWAKENING WAS A WELCOME DISTRACTION.

THE NEWS FROM HOME WAS INCREASINGLY UNSETTLING.



SOON AFTER JOAN AND I HAD MOVED IN TOGETHER FOR THE SUMMER, I GOT MOM'S CALL ABOUT THE DIVORCE.

AND TWO WEEKS AFTER THAT, THE CALL ABOUT THE ACCIDENT.



Attachment B

Gender Queer: A Memoir, by Maia Kobabe



FAST-FORWARD: WE'VE BEEN DATING FOR TWO MONTHS. WE'VE MADE OUT, WE'VE HAD SEX, WE'VE MOVED ON TO SEXTING AT WORK.



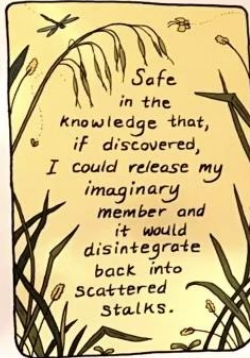
I WAS 11 OR 12 YEARS OLD THE FIRST TIME I CAN REMEMBER FANTASIZING ABOUT HAVING A PENIS.



I WAS LYING, FULLY CLOTHED, ON A HILLSIDE UNDER AN OPEN SKY.



I HELD A FOLDED HANDFUL OF GRASS BETWEEN MY LEGS.



Safe in the knowledge that, if discovered, I could release my imaginary member and it would disintegrate back into scattered stalks.



FOR YEARS MY STANDARD METHOD OF MASTURBATION WAS STUFFING A SOCK INTO THE FRONT OF MY PANTS AND MANIPULATING

The Bulge.



THIS WOULD EVOLVE INTO HIP-THRUSTING WHILE THINKING OF MY LASTEST GAY SHIP...



MEMORABLY, I GOT OFF ONCE WHILE DRIVING JUST BY RUBBING THE FRONT OF MY JEANS AND IMAGINING GETTING A *Blow JOB.**

* I PROMISE I'M A REALLY SAFE DRIVER.