

IN THE EUROPEAN COURT OF HUMAN RIGHTS

Application no. 54699/14

BETWEEN:

Adem Kartal and Others

Applicants

-and-

Turkey

Respondent

-and-

Volunteer Jurists Association

Intervener

**WRITTEN SUBMISSIONS ON BEHALF OF THE VOLUNTEER JURISTS
INTERVENER**

**pursuant to the Section Registrar's notification dated 5 July 2021 that the President
of the Section had granted permission under Rule 44 § 3 of the Rules of the European
Court of Human Rights**

September 2021

I. Introduction

1. This submission is made by Volunteer Jurists, pursuant to the leave to intervene as a third party granted by the President of the Second Section on 27 August 2021 in the case of Kartal v. Turkey and 48 others (application no. 54699/14) pursuant to Rule 44(3) of the Rules of Court.
2. The case of Kartal v. Turkey and 48 others concerns the premature termination of the mandates of the applicants working as judges at the High Council of Judges and Prosecutors (HCJP), following the adoption of Law No. 6524, adopted on February 15, 2014 and published in the Official Gazette on February 27, 2014, regarding the amendment of certain laws ("Bazı kanunlarda değişiklik yapılmasına dair kanun").
3. Article 39 of Law 6524 establishes that the terms of office of the secretary general, the deputies to the secretary general, the chairman of the board of inspectors, the deputies to the chairman of the board of inspectors, the inspectors of the council, the rapporteur judges and the administrative staff of the HCJP shall terminate on the date of this act.
4. The applicants allege a violation of Article 6 of the Convention. They were former rapporteur judge and inspectors of the Board of Inspectors prior to the entry into force of the law concerned.
5. Volunteer Jurists believes that examination of this case particularly requires assessment and observation of the climate in which Law no 6524 brought into force in Turkey in February 2014. The impacts and real motives of such important legislative changes on the independence and impartiality of the judiciary cannot be properly assessed without taking into account the circumstances under which they were introduced and sequence of events prior to (also in the aftermath of) the enactment of this law. Therefore, without touching upon the merits of the applications and individual circumstances of each applicants, this third party intervention will firstly outline the climate in which those changes were made and the sequence of developments prior to the introduction of Law no 6524. Secondly, it will briefly review the current state of independence and impartiality of the judiciary in Turkey, which is an outcome also of this important legislative steps taken in February 2014. Finally, the intervention deal with and provide input regarding the specific questions raised by the Court to the Parties.

II. SEQUENCE OF EVENTS PRIOR TO THE INTRODUCTION OF LAW NO 6524

6. As summarized by the Court in its recent judgement Akgün v. Turkey (Application no. 19699/18), on December 17 and 25, 2013, as part of an investigation into corruption, a large wave of arrests was made in circles close to the AKP (ruling Justice and Development Party, in power since 2002). Thus, high-level personalities, of political power, including the sons of three ministers, the head of a state bank, senior civil servants and businessmen working closely with the public authorities, were questioned. The government attributed responsibility for this initiative to police officers and judges allegedly affiliated with the Gülen movement, calling the investigation a plot and an attempted "judicial coup" against the executive.
7. Similar to many modern criminal procedure laws, the Turkish law obliges prosecutors to investigate in a neutral manner, collecting evidence for and against potential suspects, whenever they consider that there are sufficient indications that a crime was committed.

However, as outlined in the European Commission's 2014 Turkey Progress Report, "in response to the allegations of corruption, the government alleged that there had been an attempted judicial coup by a 'parallel structure' within the state, controlled by the Gülen Movement. Prosecutors and police officers in charge of the original investigations of 17 and 25 December were removed from their posts. A significant number of reassignments and dismissals in the police, civil service and the judiciary followed, accompanied by legal measures in the judiciary. ... As part of that response, key legislation, including on the High Council of Judges and Prosecutors and on the internet, was drafted and adopted in haste and without consultations. ... On 19 December, the government amended the regulation on judicial police to require law enforcement officers, when acting upon instructions of prosecutors, to notify their police hierarchy about any criminal notices or complaints. On 25 December, police did not follow instructions from prosecutors to detain suspects as part of two investigations into alleged corruption. The HCJP issued a statement on 26 December criticizing this amendment as being contrary to judicial independence. On 27 December, the Council of State suspended implementation of the amendment considering it to be contrary to the Code on Criminal Procedures. The Minister of Justice, in his capacity as President of the HCJP, decided on 30 December that any HCJP public statement should receive his prior approval."¹

8. In the Cabinet overhaul of 25 December 2013, the Minister of Justice was also fired. The newly appointed Minister of Justice automatically became the ex officio President of the HCJP. He selected a new Undersecretary to the HCJP, who thereby automatically became an ex officio Member of the First Chamber of the HCJP. In the first session of the Plenary of the HCJP on 15 January 2014 which he presided, the Minister proposed (and the majority agreed to) an addition to the agenda concerning changes to the composition of the three Chambers. The reason for this modification given by the Minister was that the work of the Chambers should be made more efficient. The Plenary thereupon re-evaluated each member one by one and decided whether to leave him or her in the current position or transfer him or her to another Chamber. As a result, two members of the First Chamber were exchanged, one with a member of the Second Chamber and the other one with a member of the Third Chamber. On the following day, the newly composed First Chamber issued a decree by a majority of six (including the three new members) to one. By that decree which was effective immediately the First Chamber transferred to other locations prosecutors who were considered responsible for the investigations against the cabinet members and/or their family members. The reason given was that there had been irregularities in those investigations and that the timing indicated a coordinated attack on the Government by "foreign circles" or a "parallel structure."
9. Pursuant to the Law No. 6087 on the HCJP in the version which was then applicable, the disciplinary power over judges and prosecutors was actually vested in the Second and Third Chambers. The Third Chamber was responsible for investigations with the help of the Inspection Board, subject to the approval of the Minister in his capacity as the ex officio President of the HCJP, and the Second Chamber was responsible for deciding on whether the results of those investigations warranted disciplinary action or even prosecution. But the majority of the First Chamber (which is responsible for routine transfer decisions) believed that there was no time to follow that regular procedure and that the transfers had

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52014SC0307&from=BG> , page 9.

to be made immediately to avoid “irreparable damage” – to the judiciary. Some members of the HCJP believed that this was interference by the First Chamber in the responsibility of the other Chambers.

10. The course of action taken by the First Chamber risked being perceived by judges and public prosecutors in Turkey as an indication that, if they are involved in high-profile cases, they are subject to immediate transfer of location, whenever the majority of the First Chamber is dissatisfied with their performance, irrespective of the reason for such dissatisfaction and irrespective of whether they committed any disciplinary offence. This raised concerns because it was likely to destroy much of the progress which had been made in creating a mentality of independence in the members of the judiciary.

II. ENTRY INTO FORCE OF LAW NO 6524

11. In the motion of the Law No 6524 submitted to the Parliament declared that, mentioning the reforms carried out through the 2010 Constitutional referendum carried out in 2010, this draft law foreseeing important changes, inter alia, in the functioning and composition of the HCJP was needed for a more effective and efficient functioning of the HCJP, taking into account the developments took place in last three years².
12. The Law No. 6524 added the Provisional Art. 4 to the Law No. 6087. According to this provision, the entire personnel of the HCJP (including the Secretary-General, Deputy Secretaries-General, President and Deputy Presidents of the Inspection Board, all the inspectors, rapporteur judges and administrative staff) was automatically dismissed with the entry into force of the Law. New personnel were to be appointed or elected within ten days. The dismissed staff members were to be reassigned to new posts, taking their acquired rights into consideration. With the entry into force of the Law, also all the circulars of the HCJP were automatically revoked. The new appointment powers of the Minister and/or the Plenary of the HCJP were immediately used before the Constitutional Court could order the stay of execution.
13. According to the information shared by the interlocutors of during a Peer Review Mission on the High Council of Judges and Prosecutors held by an individual EU Commission expert between 6-8 May 2014, with the enactment of the Law 6524, “the previous President of the Inspection Board was reappointed, and two new Deputy Presidents appointed. 57 of the previous chief inspectors and inspectors were reappointed, while 80 previous members of the Inspection Board were transferred. Of the previous 47 rapporteur judges, 18 were retained and 29 transferred. Of the previous 270 administrative staff members, 228 were retained, 195 of them on a temporary basis. In total 80 of 137 inspectors and 29 of 47 rapporteur judges were removed from the HCJP. Only with regard to the administrative staff, the majority of the previous staff members was rehired.”³
14. The decision-making process, however, on which members of the previous personnel to rehire was neither transparent and nor based on any objective criteria. The dismissal of hundreds of judicial and administrative personnel by an act of the legislature without consideration of the individual cases was highly unusual. Provisional Art. 4 amounted to an annihilation of the entire record of the post-2010 HCJP.

² <https://www.tbmm.gov.tr/d24/2/2-1929.pdf>, page 14.

³ https://www.avrupa.info.tr/sites/default/files/2016-11/Final_TG_Report18122014.pdf

15. The HCJP has been the most important centralized body responsible for the organization of the entire judiciary, with power to decide on admission, appointment, transfer, promotion, disciplinary measures, dismissal, and supervision of judges and public prosecutors.
16. Following the Constitutional amendments of 2010, the influence of the Ministry of Justice on the composition of the HCJP was, in theory, significantly limited. Importantly, the 2010 Constitutional amendments established the HCJP's administrative and budgetary autonomy from the Executive. Constitutional amendments introduced in 2010 transferred the power of supervision of the judiciary and the prosecution service from the Ministry of Justice to the inspectors of the HCJP, with regard to the performance of their duties in accordance with laws, regulations, by-laws and circulars. Investigation into whether judges have committed offences in connection with, or in the course of, their duties, and into whether their behaviour and conduct are in conformity with the requirements of their status and duties, are carried out by the Council's inspectors, with the permission of the President of the HCJP.
17. The rapporteur judges of the HCJP and inspectors of the Board of Inspector have remained as an important part of the HCJP and independent and impartial judiciary. They have performed important judicial functions in support of the HCJP that all depend on such support in order to function effectively. The independence and impartiality of the respective judicial body must therefore also cover the rapporteur judges as well as inspectors.
18. The amendments made by Law no 6524 had obviously nothing to do with the declared aim of the said draft law, that is to say creating a more efficient and effective HCJP, but instead it was perceived as a warning to the HCJP – both the members and their staff – as well as to the entire judiciary, represented by the HCJP, that any action considered as a judicial interference by the authorities is unwelcome and will have consequences, including dismissal from the current position. This statutory step taken in response to the 17 – 25 December large-scale corruption probe was the first milestone statutory and de facto intervention of the Government to the independence and impartiality of the HCJP and the judiciary as a whole.
19. The subsequent alarming interventions and concerted attacks starting with the enactment and arbitrary enforcement of Law No 6524 and particularly with the latest major problematic changes made in the composition of the Council of Judges and Prosecutors, through amendments to the Constitution adopted by the Grand National Assembly on 21 January 2017 and submitted to a national referendum on 16 April 2017, including retrogressive amendments to the legislative framework, increased executive control in practice of the governing institutions of the judiciary and prosecution service; the arrest, dismissal and arbitrary transfer of judges and prosecutors; and recurring instances of violence and threats against lawyers, have significantly compromised the institutional independence of the judiciary and the personal independence of individual judges and highly politicised the judiciary and its institutions. As concluded by the International Commission of Jurists, “since 2014 through a combination of legislative measures, institutional reforms initiated by the executive, and arbitrary application of criminal and disciplinary sanctions, the executive has asserted an unprecedented degree of control of the

judiciary, and has taken steps towards purging it of those judges perceived to have affiliations to interests other than those of the governing party.”⁴

20. The Grand Chamber recently concluded in the judgment of *Selahattin Demirtaş v. Turkey*(No.2) (*Application n. 14305/17*) that “the reports and opinions by international observers, in particular the comments by the Commissioner for Human Rights, indicate that the tense political climate in Turkey during recent years has created an environment capable of influencing certain decisions by the national courts, especially during the state of emergency, when hundreds of judges were dismissed, and especially in relation to criminal proceedings instituted against dissenters.”

III. ALLEGED VIOLATION OF ARTICLE 6 § 1 OF THE CONVENTION AND APPLICABILITY OF ARTICLE 6

21. With regard to applicants’ complaint of violation of their right to access to a court to challenge premature termination of their mandates at the High Council of Judges and Prosecutors. The Court asked to the Parties whether article 6 § 1 of the Convention in its civil aspect was applicable to the case in question (*Baka v. Hungary* [GC], no 20261/12, §§ 100-118, 23 June 2016).
22. For Article 6 § 1 in its civil limb to be applicable, the Court requires that there must be a “dispute” regarding a “right” which can be said, at least on arguable grounds, to be recognised under domestic law, irrespective of whether it is protected under the Convention. Additionally, the dispute must be “genuine” and “serious”; it may relate not only to the actual existence of a right but also to its scope and the manner of its exercise and finally, the result of the proceedings must be “directly decisive” for the right in question, mere tenuous connections or remote consequences are not sufficient to bring Article 6 § 1 into play (see *Baka*, cited above, § 100 and *Denisov v. Ukraine* [GC], no. 76639/11, § 44, 25 September 2018). In determining whether there was a “right” within the meaning of Article 6 § 1, the Court ascertains only if the applicants’ arguments were sufficiently tenable, not whether they would necessarily have won had they had access to a court (see, *inter alia*, *Neves e Silva v. Portugal*, 27 April 1989, § 37, Series A no. 153-A). According to the Court although there is in principle no right under the Convention to hold a public post entailing the administration of justice (see *Dzhidzheva Trendafilova v. Bulgaria* (dec.), no. [12628/09](#), § 38, 9 October 2012; and concerning tenured judicial positions, *Baka*, cited above, § 107; *Denisov*, cited above, § 47, and *Kövesi v. Romania*, no. [3594/19](#), § 113, 5 May 2020), such a right may exist at the domestic level.
23. In the present case it is clear that all the applicants were entitled under the domestic law to work at the HCJP until their retirement if none of the exceptional grounds for early termination of office, as set out in Article 42 of Law No 6087, materialised. Article 42 of the said law stipulates that the secretary general, deputy secretary general, rapporteur judges and inspectors of the Council can be appointed to other suitable positions, on their request or ex-officio, by the First Chamber upon the decision of the General Board.
24. According to Article 140 of the Constitution, judges perform their duties based on the principles of independence of judiciary and tenure of judges. The final paragraph of the

⁴ See the details of all those interventions: <https://www.icj.org/wp-content/uploads/2016/07/Turkey-Judiciary-in-Peril-Publications-Reports-Fact-Findings-Mission-Reports-2016-ENG.pdf>

same article states that the provisions about judges and prosecutors equally apply to judges and prosecutors working at administrative positions.

25. These principles provided the applicants at least with an arguable basis on which the right to be protected against arbitrary removal from their duties could be claimed (see, *mutatis mutandis*, *Bilgen v. Turkey*, § 57). There can therefore be no doubt that judges also working in the administration of judiciary may claim, on the basis of the constitutional protection afforded to them, that the principles of independence of the judiciary and the security of tenure of judges should be fully complied with in measures affecting their status or career.
26. Law No 6087 requires certain qualifications for the chief inspectors and inspectors working for the Council. They are selected by the General Board especially from the judges and prosecutors who are believed to be beneficial at the service of Council inspection. In determining that their personal and professional integrity, success in their former duties and other qualifications make them to come to the fore amongst their peers are considered by the General Board. As long as they perform their duties in accordance with the requirements of legislation and they do not abuse their powers and continue to be beneficial for the performance of tasks of the Board of Inspectors, their mandates at the HCJP as inspectors of rapporteur judges should not be terminated before their retirement age unless they wish otherwise. (see, *mutatis mutandis*, *Bilgen v. Turkey*, § 60) The Law no 6087 could be said to have created a legitimate expectation to remain at the HCJP contingent on performance and conduct.
27. Applicants in the present case were immediately terminated from their positions with the enactment of Law no 6524 and they were not repositioned afterwards. As the Law no 6524 did not require any objective criteria for termination and repositioning and the HCJP did not disclose any reasoning, the applicants could never learn the reasoning behind the decision of premature termination of their duties by Law no 6524 at the HCJP. It should also be taken into account that the applicants, whose performance and conduct had not been never called into question, and who in any case were not duly apprised of the reasons for their early termination of duties, could argue that their premature termination were not in compliance with the provisions of domestic law. In these circumstances, and in so far as the factual or legal basis for the applicants' premature terminations were not disclosed to them, the applicants could legitimately suspect an element of arbitrariness in their terminations and this provided certainly an arguable basis on which the right to be protected against arbitrary termination of duty could be claimed.
28. In the light of the above considerations, a dispute (contestation) over a "right" for the purposes of Article 6 § 1 can be said to have existed in the instant case. As regards the question whether the subject-matter of the dispute qualified as "civil" within the meaning of Article 6 of the Convention, Voluntary Jurists would like to bring the following to the attention of the Court.
29. If an inspector is dismissed by the General Board against his or her will this certainly gives an indication that he or she has lost the professional integrity or he or she is perceived as he or she could not perform the duties expected or he or she might be thought that he or she might have misused his or her powers. No longer being of an inspector or rapporteur judge or deputy chief of Board of Inspectors certainly creates a considerable suffering in

terms of losing of prestige. Expelling of somebody from such a prestigious position without any grounds being disclosed to a lower level court or prosecution service contrary to his or her vested high level position will certainly have a negative long-term suffering in their social and professional life.

30. Arbitrary or unjustified premature termination without pressing reasons or other legal grounds might have considerable negative impacts over their family life as well. Applicants who might mostly have had first-grade judge position and successful professional background with sufficiently long term of service in the other judicial districts had the right to remain and continue to live in Ankara. As most of them had established their family life in Ankara with the expectation of pursuing their profession until their retirement age unless they want to do so and as long as they perform their duties successfully, it is unquestionable that their private and family life was substantially affected as a consequence of premature termination of their positions at the HCJP.
31. Additionally, the termination of the position of inspector creates the loss of additional economic benefits. According to Article 106 of Law no 2802, inspectors of the HCJP are paid an additional payment of 5 percent of their gross monthly salaries.
32. As presented above premature termination of their positions at the HCJP entailed direct pecuniary effects such as a reduction in salary or a loss of allowances. This gave rise to a civil right or obligation. Also, the long-term negative effects and sufferings of the premature termination of the applicants' private and family life can constitute a basis for finding that it affected their civil rights and obligations.
33. Moreover, bearing in mind the presumption that Article 6 applies to "ordinary labour disputes" and taking into account that the premature termination of applicants' position at the HCJP had considerable effects on their professional life and career and that it was a unilateral statutory measure relating to the employment relationship which was neither insignificant nor a mere formality, it should be concluded that it would be artificial to exclude the dispute at issue from the protection of Article 6 for any reason and the dispute concerned relates to their civil rights and obligations. (Baka, §§ 34 and 107-11, and Denisov, §§ 25, 47-48 and 54)
34. With regard to the question of whether the applicants had access to a court within the meaning of Article 6 § 1 of the Convention, in order to obtain a decision regarding the premature termination of their mandate due to the adoption of Law no. 6524, it should be noted that the premature termination of applicants' administrative positions were the direct and automatic result of the entry into force of the said law. Article 39 of Law no. 6524 imposes the termination of all listed officials' positions with the entry into force of the Law concerned.
35. In cases of employment disputes concerning civil servants, the Court applies a two-tier test, which it established in its Grand Chamber judgment in *Vilho Eskelinen* ("Eskelinen test"). In order for the respondent State to be able to rely before the Court on the applicant's status as a civil servant in excluding the protection embodied in Article 6, two conditions must be fulfilled. Firstly, the State in its national law must have expressly excluded access to a court for the post or category of staff in question. Secondly, the exclusion must be justified on objective grounds in the State's interest.

36. In the present case, Law no 6524 did not foresee any possibility to appeal or to have access to a court in order to obtain a decision in relation to premature termination of their mandate. As this outcome was not the result of an ordinary administrative act but the result of a legislation enacted by the Parliament it is not possible to bring a case in any court against the premature termination.
37. In other words, the applicants were prevented from exercising their functions by way of a parliamentary law allegedly reforming the HCJP. The courts of general jurisdiction in Turkey did not have power to set aside laws as being unconstitutional and individuals do not have right of individual petition to the Constitutional Court, which is the sole court empowered to repeal a statutory provision. Therefore, as the applicants' complaint directly concerned a statutory provision, it should be concluded that applicants had no judicial remedy and did not have a right of access to a court under national law in relation to their claim which is at issue in the present case.
38. Even if the Court rules in the present case that the first condition of *Eskelinen* test referring to "express exclusion" of access to court was satisfied, in any event, there are grounds to rule that the second condition of *Eskelinen* test was not satisfied. Law No 6524 does not state any reason for the premature termination of mandates of all staff of the HCJP with the entry into force of the law. As noted above, the motion of Law No 6524 submitted to the Parliament declared that the aim of this law was to ensure effectiveness and efficiency of the HCJP, despite a big reform had already been realized just three years before the submission of the law concerned, taking into account the developments took place in last three years⁵.
39. However, Law No. 6524 had nothing to do with a reform or increasing the efficiency and effectiveness of the HCJP in line with rule of law principle. It rather aimed at further politicization of the HCJP and consolidation of executive control over the HCJP and judiciary.
40. Instead of completing the reform of the HCJP in those areas where issues of judicial independence and impartiality have remained, it dismantled previous accomplishments which had been just about to take root. For instance one of the most important changes brought about by the reform of 2010 was to transfer the responsibility for the Inspection Board from the Ministry of Justice to the HCJP. Law No. 6524 , however, re-transferred that power to the Minister of Justice in his capacity as the ex-officio President of the HCJP. Moreover, the new Law provided that the Inspection Board perform their duties on behalf of the Council, but under the supervision of the Minister in his capacity as the ex-officio President of the HCJP. It was also stated that the President of the Inspection Board was responsible to the Minister in his capacity as the ex-officio President of the HCJP. The Minister furthermore given the power to impose duties on the President of the Inspection Board (a power previously held by the relevant President of Chamber) and on the Inspection Board (a power previously held by the Plenary. These were just several amendments made under the pretext of reform⁶.

⁵ <https://www.tbmm.gov.tr/d24/2/2-1929.pdf>, page 14.

⁶ For further analysis of the amendments made by Law No 6524 see

41. To obtain full control of the HCJP the most important step taken by the Law was the complete shut down the HCJP for a certain – albeit short – period of time by termination of all the staff of it including the applicants. Provisional Art. 4 (Article 39) amounted to an annihilation of the entire record of the post-2010 HCJP. It could only be perceived as a warning to the HCJP – both the members and their staff – as well as to the entire judiciary, represented by the HCJP, that any action considered as a judicial interference by the authorities was unwelcome and would have consequences, including dismissal from the current position.
42. In summary, the premature termination of mandates of the applicants took place under abovementioned circumstances. Therefore, the lack of a judicial remedy to challenge the applicants’ removal from their mandates at the HCJP could never be justified under the *Eskelinen* test and exclusion of access to a court resulted from a legislation as such aimed at the dismantling of independence of judiciary and consolidating political power over the HCJP could never be regarded as consistent with the rule of law.
43. Whether the applicants obtained a right of access to a court to have their complaint under Article 6 § 1 of the Convention examined as a result of the fact that the Constitutional Court annulled Article 39 of Law no. 6524 on the grounds that it was contrary to Constitution is the question answer of which will be sought by the Court in examining the present case.
44. It should be noted that the Constitutional Court with its judgement concerned eliminated most of the provisions of Law No. 6524 that had increased the powers of the Minister in his capacity as the *ex officio* President of the HCJP, including Article 39 introducing the legislative dismissal of the entire personnel of the HCJP. However the Court did not (and could not) undo the accomplished facts caused by the entry into force of Law No 6524.
45. The new appointment powers of the Minister and/or the Plenary of the HCJP were immediately used before the Constitutional Court could order the stay of execution. Law no 6524 entered into force on 27 February 2014 and new appointments were realized on 28 February 2014⁷. The appointment of the new inspectors had been done by the Plenary of the HCJP even before the reasons for the Constitutional Court decision were published.
46. On 14 May 2014, the Turkish Constitutional Court found a number of provisions including Article 39 of Law no 6524 unconstitutional and gave the legislature a deadline of three months to adopt revised legislation. However, according to Article 153 of the Turkish Constitution the judgment of the Court had no retroactive effect. As a result, many members of staff laid off were not re-hired and newly appointed staff remained in place. In June 2014, Turkish Parliament adopted legislation to implement the Constitutional Court’s decision. This legislation brought back into force the legal provisions introduced in 2010, restoring the role of the plenary, but did not have any impact over the premature termination of mandates of the applicants at the HCJP.

⁷ <https://www.trthaber.com/haber/gundem/HCJPda-yeni-atamalar-119665.html>