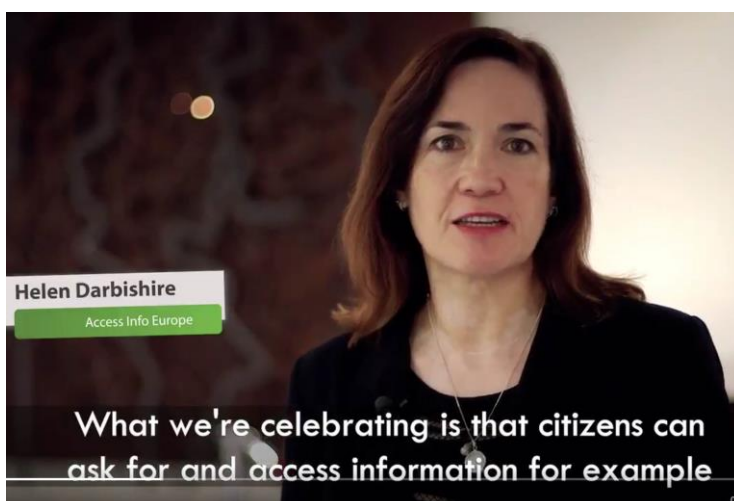


Activity Report 2017

Message from the Executive Director

Some key campaigns dominated Access Info Europe's work during 2017. These included our campaigns across Europe to open up decision making and our campaign at the EU level to obtain access to the travel expenses of Europe's 28 Commissioners.

There were some important victories during the year: gaining access to documents at the EU and national level and winning some important appeals and court cases, including securing the first court acknowledgment of the right to information as a fundamental right in a High Court decision in Spain.



We are often asked how we prioritise the work that we do in Access Info, particularly when there are so many transparency challenges to choose from. The rationale for our choices are that we need to make the right of access to information work in practice both as a right in and of itself and also to serve the democratic objective of helping defend human rights and reduce corruption.

Hence campaigns such as that to secure publication of the European Commissioners' travel expenses are important because integrity has to be the foundation of a democratic government. In a context in which there is concern about falling levels of trust and rising populism, it is essential that the public be assured of the integrity of public officials. Given numerous scandals in countries around Europe as the result of abuse of expenses, openness about such spending should be a feature of every governments' transparency policy and the EU should be taking a lead on this. It is positive that by the end of 2017 we secured such a commitment, which will serve as a model for other countries.

Similarly, with the priority emphasis on opening up decision making: we can't really talk about participation if the public doesn't have information. Research by Access Info and our partners shows that we still have a long way to go to achieve true openness of decision making, but thanks to our three-year project completed in 2017, we now have a clear road map about how to achieve this with specific recommendations in areas such as keeping records of meetings, transparency around lobbying, and identifying priorities for the type of documents that should be published proactively.

The day to day exercise of the right is also essential, and hence the conclusion at the end of 2017 in a case brought by Access Info that requesters should not be forced to identify themselves when submitting requests is absolutely essential to ensure that this fundamental right of access to information really is a right that belongs to everyone!

Helen Darbshire, Executive Director

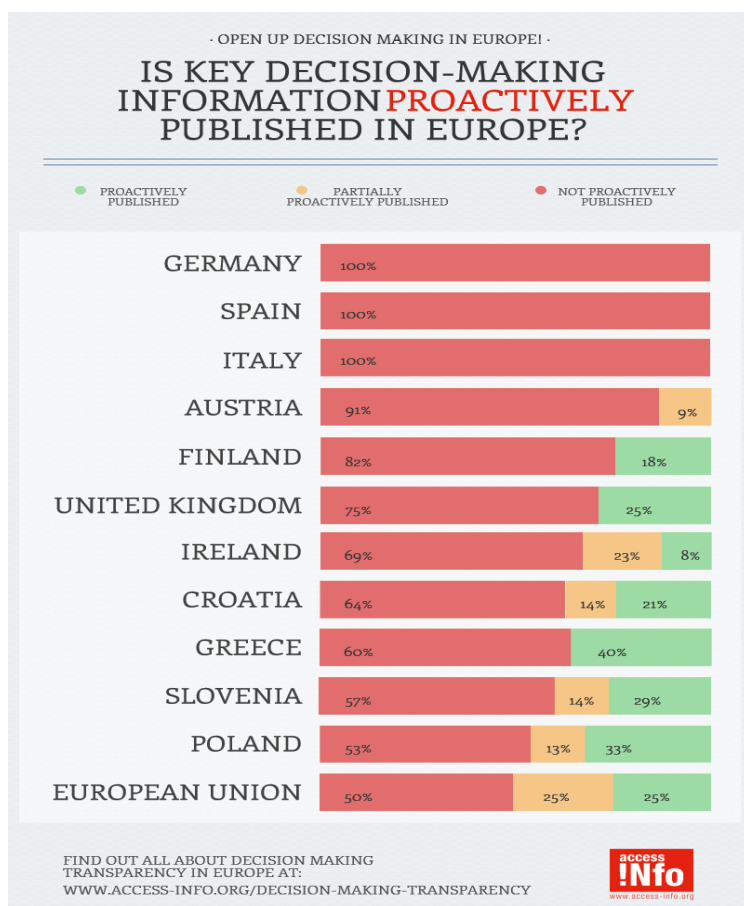
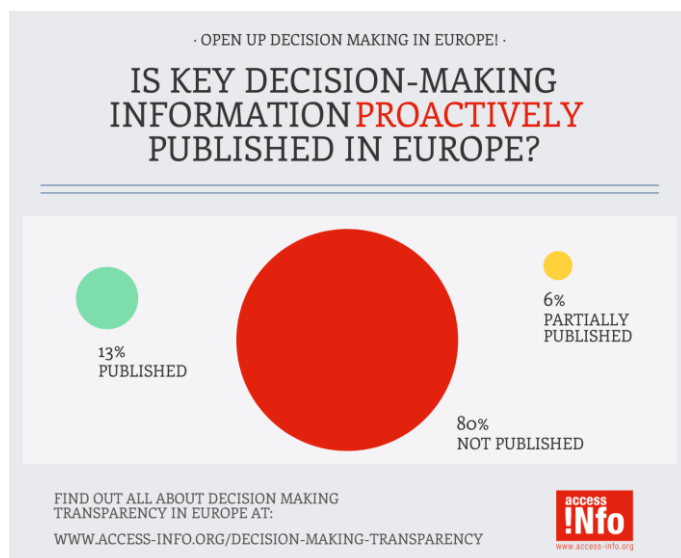
Opening Up Decision Making

While much transparency and open data work has focused on information needed to hold governments to account, particularly for the spending of public funds and in areas such as public procurement, there has been less of a focus on opening up the decisions the heart of government processes.

In 2017 Access Info completed first ever comprehensive investigation into the state of transparency of decision making across Europe, a three-year project carried out with partners in 13 European jurisdictions.

Over the three years of this large-scale project, Access Info and partners conducted extensive research into the current state of decision-making transparency.

The research revealed a stunningly bad situation with incredibly low levels of proactive publication: just 13% full proactive publication and 6% partial, leaving a full 80% of documents needed to participate in decision making being unavailable without a request.



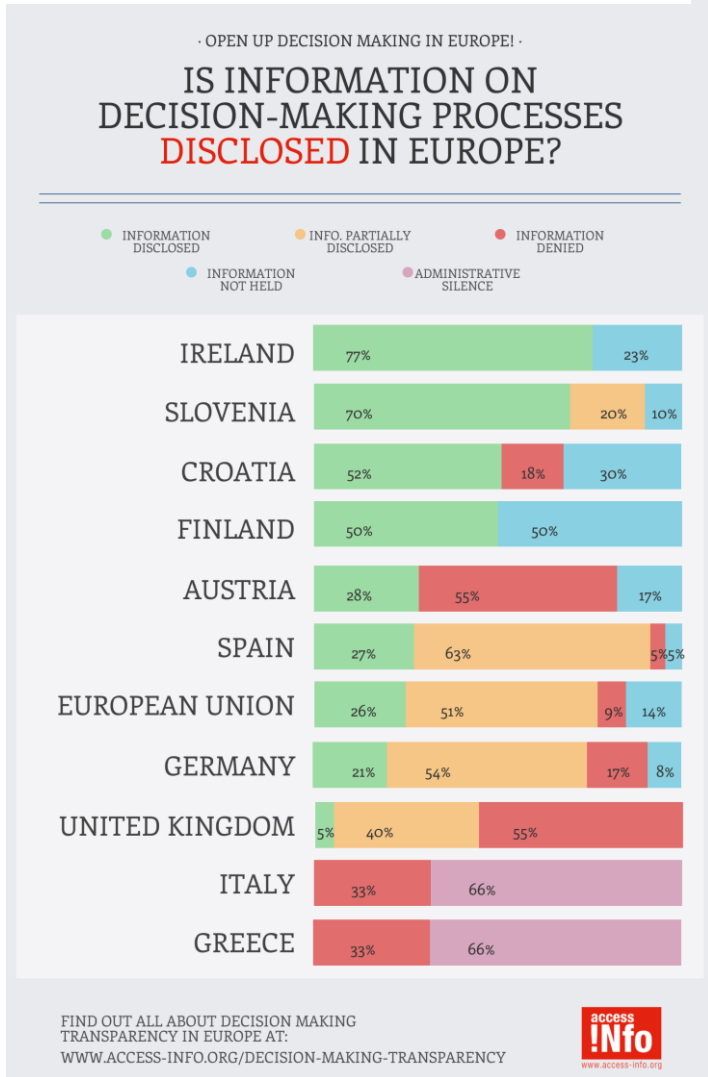
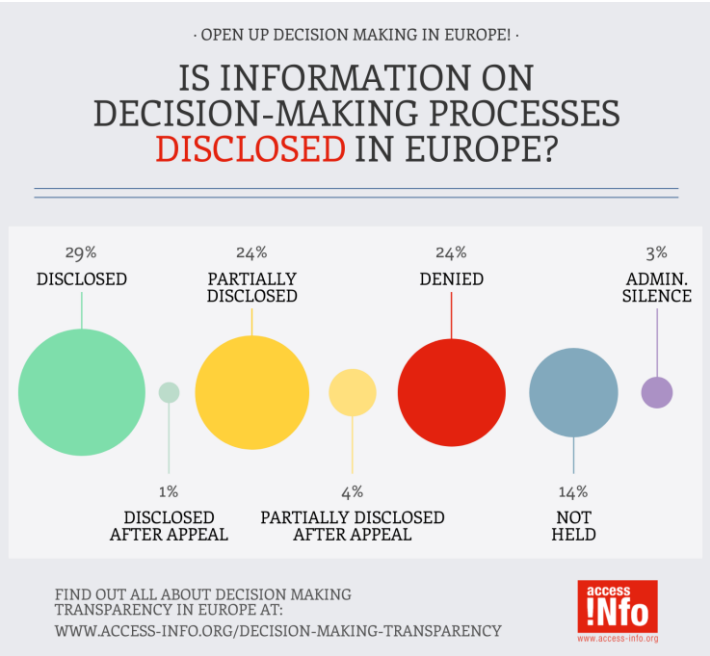
The picture also varied across Europe, with some countries, notably Germany, Spain and Italy not making available any of the information in the decision making processes that we investigated.

At the other end of the scale, Slovenia, with its investment in e-government, and Poland, where CSOs have successfully secured that lobby documents be proactive published, fared rather better. And strongest of all on proactive publication was the EU, which demonstrates that the campaigning by civil society over the years for greater EU transparency has had an impact, something that can be an inspiration for other countries as well.

When it comes to information disclosed in response to requests, the picture was also very mixed, with just 29% of the information we sought being fully disclosed.

The picture was particularly bad in some categories of information, for example, our research found that 14% of the documents we requested did not exist and when it comes to minutes of meetings, this rose to a full 48%, so that for almost half of all meetings of interest, there were simply no minutes.

This means that for all that some information is proactively published, the key information needed to follow and understand a decision-making process is often missing, and with only some parts of the jigsaw puzzle available, it's very hard for the public to really know what is going on.



Here again, we had a very mixed picture around Europe. Ireland did particularly well in responding to requests for information, perhaps in part because of its strong lobby transparency regulations mean that certain information is captured and organised in a format that makes it easier to release subsequently. Slovenia and Croatia with their strong access to information laws in the cases and Finland with its culture of transparency also did well in responding to requests.

The European Union was a midrange performer in this study, whereas Germany, Italy and Greece with their weaker access to information laws performed very badly. Perhaps surprisingly Austria in this particular study performed better than the UK, which shows that transparency can be variable within and between countries depending on which particular information is requested.

HOW ACCESS INFO IS USING THE DECISION-MAKING TRANSPARENCY FINDINGS

Based on the evidence collected, Access Info and our partners have developed a very specific set of recommendations, which we started in 2017 to promote widely, including by successfully incorporating them into various declarations and standards.

The mapping of comparative law and practice carried out under the project, taken together with the findings from the monitoring, sets a clear agenda for reform.

The recommendations set a priority agenda for advocacy and campaigning Access Info, our RTI partners, and other civil society organisations.

During 2017 we presented the findings to key forums, including for example to the global meeting of Information Commissioners, held in Manchester in September 2017.

The priority of opening up decision making is also defining Access Info requests and strategic litigation, as shown in the remainder of this annual report, with more details available on our website.

· OPEN UP DECISION MAKING IN EUROPE! ·

TRANSPARENT GOVERNMENT **NOW:** FOUR URGENT ACTIONS



TRANSPARENCY APPLIES TO ALL!

All public bodies which bear responsibility for decision making should fall under the scope of the access to information laws.



CREATE **RECORDS**!

Documenting information around decision-making processes is essential to ensure public participation and scrutiny, as well as for the historical record.



BETTER **PROACTIVE** PUBLICATION!

Proactive publication of information such as agendas, minutes of meetings or third-party documents is essential for timely participation.



RAPID RESPONSES TO REQUESTS!

Prompt responses to FOI requests are essential to facilitate potential participation in decision-making processes.



APPLY **EXCEPTIONS** NARROWLY!

For information related to decision making, exceptions should always be applied narrowly and always taking into account any overriding public interest.

FIND OUT ALL ABOUT DECISION MAKING
TRANSPARENCY IN EUROPE AT:
WWW.ACCESS-INFO.ORG/DECISION-MAKING-TRANSPARENCY





Access Info team members and our lawyers in the Court of Justice of the European Union along with lawyers from the European Commission.

In line with our focus on decision-making transparency, much of Access Info's litigation during 2017 was designed to open up decision-making processes. We selected cases that relate to decisions about which there is a strong public raise interest in participating in and/or following the decision.

We also picked cases that raise important points of law, with the aim of establishing jurisprudence that will serve to help open other decision-making processes. Hence we priorities either access to specific type of documents – for example, legal advice featured in much of our litigation in 2017 – or we aimed to tackle a particular exception, for example, the over application of the decision-making exception to documents such as minutes of meetings.

As a result of this focus, cases taken at the EU level have included, as noted elsewhere, we also have a strategic litigation strategy in Spain and work with partners across Europe providing comparative information and other support, such as comparative information and identifying pro bono lawyers, for their appeals and litigation. Full details can also be found on the litigation page of the Access Info Europe website.

Litigation re EU-Turkey Deal

What's it about? Litigation against the European Commission to obtain the legal advice underlying the conclusion of the refugee return deal with Turkey. The advice was refused on grounds of international relations, protection of legal advice, and protection of decision making.

Who is being asked to decide? The Court of Justice of the European Union, based in Luxembourg

Why is it important? Given the controversy surrounding this March 2016 deal, it's essential to know whether or not there was a proper legal analysis before the decision was taken

What is the status? The case was ongoing during 2017 and Access Info Europe worked with pro bono lawyers on arguments to rebut the Commission's defence. There was an in-person audience in the Court in November 2017 and a decision is expected in the Spring of 2018.




Taking Transparency Appeals to the European Ombudsman


Making use of the option of an appeal to the European Ombudsman is an attractive option for requesters whose access to EU documents has been denied. It provides a mechanism whereby requesters can appeal free of charge with a relatively simple process without the need for a lawyer.

Access Info makes strategic and selected use of appeals to the European Ombudsman and we also regularly provide support to others, particularly to civil society working in

Brussels and around Europe as well as to journalists from around Europe and beyond who are trying to obtain information for their investigations.

Our 2017 appeals were also focused on Some of our ongoing cases during 2017 include:

 ***Decisions on how judges are appointed to the Court of Justice of the European Union.*** We asked the Council of the EU about its “255 Panel” which appoints judges to Europe’s highest court. We are seeking to get more transparency about the process of selection. After winning a first complaint to the Ombudsman about whether the Council actually “holds” this information we are now seeking access to the actual documents. This case, taken with The Good Lobby, was ongoing during 2017.

 ***Legal advice on mandatory nature of lobby register from European Commission:*** Access Info submitted a complaint to the European Ombudsman about refusal from the Commission to make public its legal analysis of the options for a future register of lobbyists and whether this can be mandatory or not. In the midst of negotiations on the future register, known as the “Transparency Register” it is essential that civil society know what the legal options being analysed are. Working with lawyers from The Good Lobby, [the Access Info complaint was submitted in parallel with a complaint from MEP Dennis de Jong against the Council of the EU](#) for refusing to make public its legal advice.

Working with Pro Bono Lawyers: An essential contribute to defence of the Right to Information

Access Info couldn’t do what it does without the support of a large number of committed pro bono lawyers, many of them leading experts in the right of access to information. We are grateful to these legal experts, working at the EU and national level on a number of our successful cases.

Although not featuring in our financial accounts in a formal way, Access Info Europe has estimated that **the value of this support in 2017 amounted to at least €100,000**, which is a considerable contribute to defence of this essential fundamental right.

Special thanks here to Onno Brouwer and the team from Freshfields, to Enrique Jaramillo in Spain, and to Alberto Alemanno, Lamin Khadar, and the team at The Good Lobby for their invaluable support in 2017.

Accountability: EU Commissioners' Travel Expenses

During 2017, Access Info campaigned for the European Commission to publish the travel expenses of the 28 European Commissioners. This campaign to get basic accountability information has a long history, going back to a request initially submitted by Helen Darbshire in 2014.



The campaign involved 120 other requesters – civil society activists, journalists, and members of the public – who also requested information about the travel costs for particular Commissioners.

We engaged members of the public after we had established that the Commission would provide each requester with a two-month sample of the travel expenses data for just one Commissioner at a time. This was established after we overcame arguments about not releasing all the information on grounds of privacy.

A further argument was that of the burdensome workload for answering both the initial request and then all the collective requests.

During 2017 the biggest surprise was that the Commission refused to register the requests coming from the 120 requesters, but rather lumped them together and continued to argue that it was too time-consuming to provide all the information.


The problematic treatment of these requests led to 53 of these requesters making a complaint to the European Ombudsman. In particular, we have questioned the legality of the European Commission's refusal to process

In parallel with the public campaign and the European Ombudsman appeal, Access Info continued to press for the proactive publication of the data, [writing a letter to EU Vice President Frans Timmermans](#) urging him to step up to transparency commitments that he had made and to release the data in its entirety.

After several reminders, the [letter was eventually answered on 24 July by the Secretary General of the European Commission, Alexander Italianer](#), who stated that the Commissioners' travel expenses are subject to internal controls as well as external controls by the Court of Auditors and that *"the Commission does not see added value in publishing online the detailed travel expenses for every mission by every Member of the Commission as your letter requests, and considers that the resource costs of processing the data to make them available on the Europa website would be disproportionate."* We forwarded this letter to the European Ombudsman to supplement the complaint.

That was in July. During August, the Commissioners' expenses campaign resulted in extensive media coverage across Europe – something of a summer media storm – samples of the coverage can be found in the [AIE in the News section of our website](#).

In September we had our first positive impact: the European Commission announced that it would publish this data in early 2018.



Settlement of mission expenses - DL-15-1048093

Mission Summary

Purpose: [REDACTED]

Name: [REDACTED] Travel Agency Check ID: 12624388

Per id: [REDACTED] Reference: DL-15-1048093

Date from: [REDACTED] to [REDACTED] Mission type: Normal mission

Place: [REDACTED] Assignment: [REDACTED]

Costs: 2763.68 euro Phone: [REDACTED]

Address: [REDACTED]

Budget: BGUE-B2015-26.010213-C1-PMO SI2.699011.1

Liquidator: [REDACTED] Phone: [REDACTED]

Costs summary

	Expenditure Report	Expense Statement		Expenditure Report	Expense Statement
1.5 Daily allowances	91.35 EUR	243.60 EUR	Travel agency costs	1746.4 EUR	1456.1 EUR
Accommodation	77.57 EUR	77.57 EUR	(approved by the Commission)		
			Others	0.00 EUR	0.00 EUR
Misc. costs	847.20 EUR	847.20 EUR			
Meals deductions	0.00 EUR	0.00 EUR			

THE DEBATE OVER EXPENSES TRANSPARENCY

“*Transparency is one of the few tools we have to reconnect with very sceptical citizens.*” – European Commission Vice President Frans Timmermans

“*The resource costs of processing the data to make them available on the Europa website would be disproportionate.*” – European Commission Secretary General Alexander Italianer

“*In order to address concerns about lavish spending in Brussels, one obvious measure is to be up front with details of how taxpayer's funds are spent on basic activities such as travel by the Commissioners.*” – Helen Darbishire, Access Info Europe

Standard Setting: the EU Transparency Agenda

In addition to Access Info Europe's actions to make the EU more transparent and to obtain particular documents, we also strongly believe that the EU needs a proper transparency policy or agenda.

Unlike many national governments, there is no lead agency on EU transparency, rather each institution has its own policy, which results in some rather disjointed thinking on what the priorities are and makes it harder for civil society and even for inter-governmental fora such as the Open Government Partnership to engage in discussions on EU transparency.

The need for the EU to have leadership on transparency is even more pressing to reverse the growing sense among European citizens that they are distanced from Brussels and that decisions are taken behind closed doors with little or no accountability, something unfortunately confirmed by Access Info's requests and monitoring.

Hence on Europe Day, 9 May 2017, Access Info Europe issued formal proposal that the EU, in a coordinated way, commit to and implement essential transparency and open government measures. Such action would be in line with a pledge made in November 2014 by European Commission President Jean-Claude Juncker who said, in the context of the need to increase trust: *"So let us be more transparent, because in fact we have nothing to hide. Let us show that this time it really is different and that together we are able to really change and renew Europe."*

The Key Elements of an EU Transparency Policy

- » Improve record keeping and create a duty to document decision making processes
- » Remove practical obstacles to requesting such as address and ID requirements
- » Comply with time frames for answering requests
- » Ensure that exceptions are properly applied in line with European Court of Justice jurisprudence
- » Ensure proactive publication of information about decision-making and legislative processes
- » Allocate sufficient resources to ensure training for EU officials dealing with public requests for information

Interest in the transparency policy came from various actors, including members of the European Parliament, with a cross-part group of MEPs, the Transparency and Anti-Corruption Intergroup (ITCO) organising an even on International Right to Know Day 2017, the conclusions of which support the need to open up decision making:

1. Decision-making should be accountable and accessible
2. There should be public scrutiny in the spending of public funds and the use of public resources
3. Transparency for the powerful to avoid conflicts of interest, corruption and other threats
4. Transparency is a fundamental right that should be implemented properly

Access Info and other CSOs now have a clear agenda on which to build future campaigns demanding greater transparency of the EU, as well as to press for an EU transparency policy.

Transparency of the Council of the EU

As part of agenda setting on transparency of the EU, the European Ombudsman held a consultation at the end of 2017 on transparency of the Council of the EU.

This consultation was part of an enquiry which in large part was based on the earlier court win by Access Info in the case of *Council v. Access Info Europe*, [won by Access Info on 17 October 2013](#), in which the Court of Justice of the EU established the right of the public to access documents containing the names of Member States putting forward legislative proposals, even at early stages of debate. The European Ombudsman in her investigation was looking into whether this case is being upheld not only in the letter but in the spirit of the case, with the latter requiring that the Council ensure that it's possible to follow the early stages of its decision-making processes.



The enquiry raises some very important issues that are part of Access Info's Decision-Making Transparency work, including the question of record keeping, as it's impossible to follow debates in the Council if detailed minutes of meetings are not kept.

In our [submission to the consultation](#), Access Info recognised that some progress has been made by the Council and highlighted areas where reform is needed. As a result of this we were invited to a talk in the Council at the beginning of 2018.

Standard Setting: Defining Open Government

Defining terms and setting standards is an essential part of Access Info's work. It's sometimes easy to forget that the right of access to information is still very young and that standards and definitions are evolving.

Hence when the OECD embarked on an exercise to define open government, Access Info engaged in the public consultation with recommendations based on our experience as well as on existing international standards.



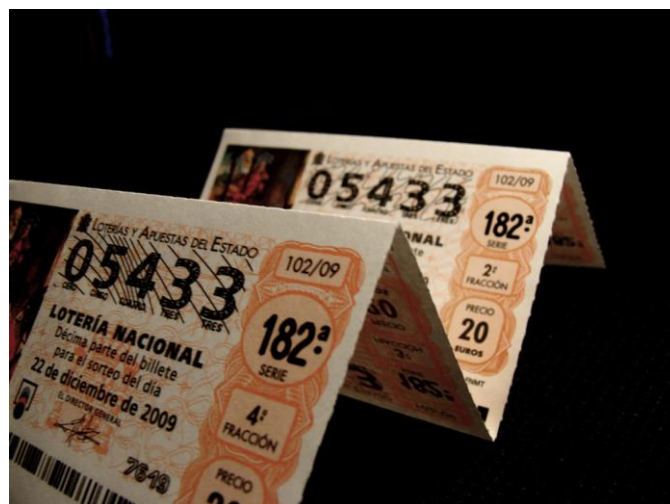
In particular, we urged the OECD to adopt a definition of an "Open Government" as one characterised by transparency, participation, responsiveness, and accountability, in line with increasingly established standards set by bodies such as the Open Government Partnership.

The positive outcome of this consultation was that in December 2017, the [OECD adopted a Recommendation on Open Government that clearly defines](#) "Open Government" as "a culture of governance that promotes the principles of transparency, integrity, accountability and stakeholder participation in support of democracy and inclusive growth", accompanied by a series of recommendations as to how governments should act to achieve this.

Spain: The Transparency Lottery

Access Info's work in Spain during 2017 continued to focus on the legal environment, and making the access to information law work in practice, but also had a strong focus on opening up decision making and on obtaining information that could be of value as part of democratic debate, particularly to journalists and civil society organisations.

One of the big challenges, the big uncertainties in Spain, is knowing which information is going to be released and which not: in the midst of a shifting culture of transparency, filing a request is a bit like buying a lottery ticket and you don't know which information you will obtain.



Some big wins for Access Info during 2017 included obtaining access to documents used by the Council of Ministers as well as the decisions issued by the ministers from their weekly meetings.

This is information that journalists are using to write stories, [including major scoops in El País and El Confidencial](#), all with information stemming from just one information requests. This case study was presented at the Perugia International Journalism Festival as an example

of the value of both submitting information requests and also being ready to appeal them to information commissioners and/or the courts.

Another huge win for Access Info was to secure a decision from the High Court that Access Info should have access to Spanish Government documents related to its participation in the Open Government Partnership (OGP). This important ruling was the first where the Court made reference to the right of access to information in international treaties, and it also limited one of the broadest exceptions in the Transparency Law – that on “auxiliary” information.

There is no doubt that the reference to the right to information as a fundamental human right was the result of the work that Access Info has been doing over the years to bring international standard to Spain and to ensure that civil society, journalists, academics, and judges, are informed about the latest developments internationally.

The documents obtained showed that in the first years of OGP membership, Spain had not taken the global alliance very seriously, and that creation and implementation of the action plans had been a formulaic, top-down exercise from the Ministry of the Presidency with almost no involvement whatsoever from civil society. As a result of the scandal around this court case, and continued calls from Spanish civil society to set up a proper consultative forum, a new government team started working on Spain's OGP programme in 2017 with a pledge to make it more open and participatory.

Supporting Campaigns to Open Up Company Ownership

In a world in which complex structures of private companies are used and abused by those intent on avoiding tax, laundering money, hiding corruption, and funding organised crime and terrorism, it is essential that mechanisms are in place to ensure to reduce this possibility.

Some of the big scandals of recent times, such as the Panama Papers and Lux Leaks have revealed that current mechanisms by public authorities and law enforcement are not working. It's clear that what is needed is better data collection by governments on who are the beneficial, or ultimate, owners of companies, and then genuine transparency so that investigative journalists and watchdog civil society organisations can play their role of ensuring that the structures that permit legitimate business to operate are not being abused.



To this end, Access Info worked during 2017 with other civil society organisations on campaigns to open up company and beneficial ownership registers. In particular we encouraged governments to sign up to the commitment in the [OGP Paris Declaration on “Ending Abuse of Anonymous Companies”](#), a commitment that Access Info Europe had helped draft in December 2016.

Access Info Europe coordinated a campaign involving 40 CSOs, including the Financial Transparency Coalition, which resulted in MEPs dropping the “legitimate interest” requirement for those wishing to search registers of beneficial owners, as part of the revision to the 4th EU Anti-Money Laundering Directive.

We also submitted a request to the Council of the European Union for a copy of its legal analysis of the possibility of opening the future register of beneficial owners to the wider public. The Council refused access to this legal opinion. Nevertheless, Access Info discovered that leaked copies of the Council's legal opinion were circulating in Brussels (in multiple languages!) creating an uneven playing field for those wishing to participate in the decision-making process.

Strongly believing that there should be equal access to this type of document, Access Info submitted a complaint to the European Ombudsman, along with a copy of the un-redacted document, challenging the refusal and calling for legal advice that relates to ongoing legislative processes to be made open, in line with jurisprudence of the Court of Justice of the European Union, in order that everyone can participate equally in decision making.



Interinstitutional File:
2016/0208 (COD)

Brussels, 16 December 2016
(OR. en)

15655/16

LIMITÉ

JUR 612
ECOFIN 1194
DROIPEN 221
CRIMORG 185
COTER 138
CODEC 1912
IA 142
DAPIX 233
DATAPROTECT 110
FISC 238

OPINION OF THE LEGAL SERVICE¹

Subject: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing and amending Directive 2009/101/EC

- compatibility of the provisions on public access to beneficial ownership information with the applicable data protection guarantees

DOCUMENT PARTIALLY ACCESSIBLE TO THE PUBLIC (17.01.2017)

I. INTRODUCTION

1. On 5 July 2016, the Commission presented a proposal for a Directive amending Directive

Campaigning against unnecessary ID requirements

It's essential that people can actually exercise the right of access to information in practice, which means being able to submit requests without a problem and also being able to obtain reasonably rapid responses.

Access Info spends a lot of time working with its partners on the mechanics of the right of access to information. Much of this is behind the scenes work on the technicalities of the right, in discussion with information commissioners, and training public officials, and even debating with IT experts about the mechanisms by which requests can be submitted.

We also take cases when necessary to defend the right of the public to ask for information without undue obstacles. One such case was our complaint to the European Ombudsman about the European Commission's requirement that all requesters provide their postal address to prove that they are "real requesters."



In December 2017, the Ombudsman [concluded](#) that this practice of verifying the identity of persons making requests for access to documents by asking for their postal addresses is "disrespectful of citizens and their fundamental rights under the EU Charter" and constitutes "maladministration". The Commission has three months to propose a solution.

This is an important decision given the increasing tendency across Europe to verify who the requesters are and to force them to provide ID information before requests will be processed, something that should not matter given that if information can be made available to one person, it should be available to all!



Italy: IDs and Silence!

Italy is another country in which IDs are required to request information, something that Access Info's partner organisation Diritto di Sapere is campaigning to change.

A further problem in Italy is the high levels of administrative silence: [in the latest monitoring it was found that a full 73% of requests are met with administrative silence](#), in other words there is no answer in the timeframes established by law. Participating in the launch of this report in Italy in April

2017, Helen Darbishire noted that addressing this serious problem must be a priority for the Italian administration. Access Info is working with Diritto di Sapere on the strategy to address this and is calling for more resources and training for public officials.

Income and Expenditure Accounts

Financial Year 1 January 2017 - 31 December 2017

This is a summary presentation in English of the original accounts prepared under Spanish law by:

Numéritas, SL

ALCALA 75 3ºIZQ

28009 MADRID

B83593764

Income

Grants and Project funds	132,063.73
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These funds comprise:

» Open Society Foundations	50,063.63
» Sticking Adessium	82,000.00

Honoraria Conferences & Consultancies	14,726.65
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Reimbursement travel / Per diems	2,858.49
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Interests / reimbursements tax / other	7.32
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Total Income	149,656.19
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Expenditure

Personnel & Management Costs

Executive Director (with tax and insurance payments)	60,984.00
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Staff and professional collaborators (inc. tax and social security)	84,161.57
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Consultants & Researchers	32,658.24
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Accountant, Payroll	7,097.82
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Legal services	1,648.46
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<i>sub-total</i>	186,550.19
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Operating and Project costs

Accommodation	4,313.88
Bank charges (includes transfer fees)	330.60
Depreciation Office Equipment & Furniture	2,218.17
Design - Graphic & Web	530.70
Gifts (in lieu of accommodation) and presents	178.80
Insurance - Office, Liability, Travel, Health	1,069.69
Office & IT Equipment	624.01
Office cleaning	2,446.28
Office rental	26,136.00
Office supplies, consumables, newspapers, books	660.21
Postage and couriers	249.18
Printing	1,386.05
Refreshments, business meals, per diems	3,538.13
Re-Grants to Partners	4,000.00
Telephone/internet/mobile/Skype	1,241.83
Travel (includes long distance and local ground transport)	11,443.68
Utilities - Electricity, Gas & Water	1,158.28
Taxes	19.95
Web domains	349.42
Web hosting	983.01

<i>sub-total</i>	63,177.77
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Total Expenditure	249,427.96
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BALANCE	- 99,771.77
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Approved by the *Junta Directiva / Executive Board*