FREEDOM OF INFORMATION COMMISSION
OF THE STATE OF CONNECTICUT

In the Matter of a Complaint by FINAL DECISION

Yulia Rubin,

Complainant

against Docket #FIC 2024-0418

Director of Health, Health Department, City of Milford; Health Department, City of Milford; and City of Milford,

Respondents July 9, 2025

The above-captioned matter was heard as a contested case on February 11, 2025, at which time the complainant[1] and respondents appeared and presented testimony, exhibits and argument on the complaint.

After consideration of the entire record, the following facts are found and conclusions of law are reached:

1. The respondents are public agencies within the meaning of §1-200(1), G.S.

2. It is found that on June 18, 2024, the complainant requested

> an opportunity to inspect or obtain in any or all media an unredacted copy of, or a full transcript of the call during which a blight complaint was reported to the Milford Health Department last Monday morning, June 10, 2024, regarding overgrown grass at my property. . . . [(the "grass complaint")].

3. It is found that on June 27, 2024, the respondents, via email, sent the complainant nine pages of records responsive to her June 18, 2024, request consisting of: (i) a one page complaint history regarding the grass complaint with the name of the individual making the complaint redacted; (ii) a one page document entitled "Investigation Events" summarizing the City's Sanitarian's investigation into the grass complaint; and (iii) seven pages consisting of images of the complainant's property.

[1]The issue underlying this matter involves a complaint made to the respondent City Health Department. For clarity, any reference to "complainant" herein refers to the complainant named in the caption, above.

4. It is found that due to technical difficulties receiving the records described in paragraph 3, above, via email, the complainant picked up physical copies of such records on July 1, 2024.

5. It is found that upon reviewing the records, the complainant requested that the respondents provide her with an unredacted copy of the complaint history described in paragraph 2, above.

6. It is found that on July 3, 2024, the respondents denied the complainant's request contending that the name of the individual making the grass complaint was permissively exempt from disclosure pursuant to §1-210(b)(3)(A), G.S.

7. By complaint dated and filed July 22, 2024, the complainant appealed to this Commission alleging that the respondents violated the Freedom of Information ("FOI") Act, by failing to provide an unredacted copy of the "complaint history" described in paragraph 3, above. The complainant also requested the imposition of a civil penalty against the respondent Health Department.

8. Section 1-200(5), G.S., provides:

> "[p]ublic records or files" means any recorded data or information relating to the conduct of the public's business prepared, owned, used, received or retained by a public agency, or to which a public agency is entitled to receive a copy by law or contract under section 1-218, whether such data or information be handwritten, typed, tape-recorded, videotaped, printed, photostated, photographed or recorded by any other method.

9. Section 1-210(a), G.S., provides in relevant part that:

> [e]xcept as otherwise provided by any federal law or state statute, all records maintained or kept on file by any public agency, whether or not such records are required by any law or by any rule or regulation, shall be public records and every person shall have the right to (1) inspect such records promptly during regular office or business hours, (2) copy such records in accordance with subsection (g) of section 1-212, or (3) receive a copy of such records in accordance with section 1-212.

10. Section 1-212(a), G.S., provides in relevant part that "[a]ny person applying in writing shall receive, promptly upon request, a plain, facsimile, electronic or certified copy of any public record."

11. It is concluded that the records described in paragraph 2, above, are public records within the meaning of §§1-200(5) and 1-210(a), G.S.

12. As noted in paragraph 6, above, the respondents claim that they properly redacted the name of the individual who made the grass complaint, because pursuant to §1-210(b)(3)(A), G.S., the respondent Health Department: (i) is a law enforcement agency; (ii) the grass complaint history was compiled in connection with the detection or investigation of a crime; and (iii) the individual who made the grass complaint was an informant.

13. Section 1-210(b)(3)(A), G.S., provides in relevant part:

> Nothing in the Freedom of Information Act shall be construed to require disclosure of . . . Records of law enforcement agencies not otherwise available to the public which records were compiled in connection with the detection or investigation of crime, if the disclosure of such records would not be in the public interest because it would result in the disclosure of (A) the identity of informants or mandated reporters, as described in subsection (b) of section 17a-101, not otherwise known or the identity of witnesses not otherwise known whose safety would be endangered or who would be subject to threat or intimidation if their identity was made known.

14. Pursuant to paragraph 13, above, for §1-210(b)(3), G.S., to apply the respondents must establish that: (i) the respondent Health Department is a law enforcement agency; and (ii) the grass complaint was compiled in connection with the detection or investigation of a crime.

Whether the respondent Health Department is a "law enforcement agency within the meaning of §1-210(b)(3), G.S.:

15. The respondent Health Department maintains that it is a law enforcement agency within the meaning of §1-210(b)(3), G.S.

16. The Commission has previously held that municipal Health Departments (or analogous agencies) are "law enforcement agencies" within the meaning of §1-210(b)(3), G.S. See, Docket #FIC 91-125, Cantalano v. Middletown Department of Health (December 11, 1991) (finding health department was a law enforcement agency as it was charged with the enforcement of the health code); see also, Docket #FIC 1998-144, Christine L. Larsen et al. v. Beth Vumbaco, Director of Human Services Health Division, City of Meriden et al (September 9, 1998); Docket #FIC 2009-094, Peter Rusciano v. Health Department, City of Stamford (July 22, 2009).

17. The complainant asserts that the Commission's past decisions cited in paragraph 16, above, to the extent they find that municipal health departments are law enforcement agencies within the meaning of §1-210(b)(3), G.S., are erroneous. Specifically, the complainant relies on a previous version of §29-6d(a)(1), G.S. (2020), which defined "law enforcement agency" as:

> the Division of State Police within the Department of Emergency Services and Public Protection, the special police forces established pursuant to section 10a-156b and any municipal police departments

> that supplies any of its sworn members with body-worn recording equipment.

18. The complainant's argument is unavailing for several reasons. As noted in paragraph 17, above, the version of §29-6d(a)(1), G.S., cited by the complainant was repealed as of July 1, 2022. See PA 20-1, Section 19. Public Act 20-1, Section 19 replaced the language cited by the complainant with its current language: "'Law enforcement unit' has the same meaning as 'law enforcement unit' in section 7-294a."

19. Section 7-294a(8), G.S., defines "law enforcement unit" as:

> ***any agency or department of this state or a subdivision or municipality thereof*** . . . whose primary functions include the enforcement of criminal or traffic laws, the preservation of public order, ***the protection of life and property, or*** the prevention, detection or investigation of crime.

(Emphasis added).

20. The current version of §29-6d(a)(1), G.S., not only replaces "law enforcement agency" with "law enforcement unit," but also expands the scope of covered entities. Thus, the clear and unambiguous text of §29-6d(a)(1), G.S., as amended and currently effective, does not limit the meaning of "law enforcement units" to state and municipal police departments.[2]

21. It is found that FOI Act does not expressly define "law enforcement agency" for the purposes of §1-210(b)(3), G.S.; nevertheless, the Commission has determined that such question is a fact specific inquiry. See Docket #FIC 2019-0421, Charles Flynn v. Burt Rosenberg, FOI Officer, City of Stamford et al. (September 9, 2020).

22. It is found that the respondents derive their authority to enforce state and municipal health codes through state statute as well as through its charter and ordinances.

23. Section §7-148(c), G.S., provides in relevant part:

> Any municipality shall have the power to do any of the following, in addition to all powers granted to municipalities under the Constitution and general statutes:
>
> (7) Regulatory and police powers
>
> . . .
>
> (H) Public health and safety

[2] Even if §§29-6d(a)(1) and 7-294a(8) G.S., could be read to be limiting the meaning of "law enforcement units" as to apply only to state and municipal police departments, those definitions apply to specific sections covering topics not at issue in the above captioned matter (e.g., body camera use and police behavioral assessments).

> (xi) Provide for the health of the inhabitants of the municipality and do all things necessary or desirable to secure and promote the public health;
>
> . . .
>
> (xv) ***Make and enforce regulations for the prevention and remediation of housing blight***. . . .

(Emphasis added.)

24. Additionally, §19a-207, G.S., states in relevant part that:

> The local director of health or his authorized agency or the board of health ***shall enforce or assist in the enforcement of the Public Health Code and such regulations as may be adopted by the Commissioner of Public Health.*** Towns, cities and boroughs may retain the power to adopt, by ordinance, sanitary rules and regulations, but no such rule or regulation shall be inconsistent with the Public Health Code as adopted by said commissioner.

(Emphasis added.)

25. The Commission takes administrative notice of the City of Milford's Charter, specifically Article V, Section 5, which states in relevant part:

> (a) (1) The health department shall be responsible for the preservation and promotion of the public health and shall perform such functions and shall have such powers and duties as are imposed by law on directors of health and such other powers and duties as the board of aldermen may prescribe.
>
> (2) The mayor, subject to the provisions of the general statutes relating to the appointment of directors of health, shall appoint a director of health who shall be the administrative head of the health department. . . . He shall be charged with the ***enforcement of all laws, ordinances, rules and regulations in respect to the public health***.

(Emphasis added).

26. The Commission also takes administrative notice of Chapter 10, Article II of the Ordinances of the City of Milford, which tasks the respondent Health Department with the enforcement of the City's "Anti-Blight Ordinance."

27. Accordingly, it is found that the respondent Health Department is a "law enforcement agency" within the meaning of §1-210(b)(3), G.S.

Whether the redacted record was "compiled in connection with the detection or investigation of a crime" within the meaning of §1-210(b)(3), G.S.:

28. As noted in paragraph 12, above, the respondent Health Department maintains that they redacted the name of the individual who made the grass complaint, in part, because the "complaint history" was compiled in connection with the detection or investigation of a *crime*.

29. In Town of Avon v. Freedom of Info. Comm'n, Superior Court, judicial district of New Britain, CV 19-6056393, 2020 WL 5102098, *2-3 (August 6, 2020), ("Town of Avon"), held that police reports concerning *infractions* arising out of unregistered vehicles were not exempt from disclosure because "infractions are not crimes within the meaning of §1-210(b)(3)(D)." Specifically, the court concluded that in order for a record to be exempt pursuant to §1-210(b)(3), G.S., it must be compiled "for the purpose of detection or investigation of a crime ***within the meaning of §53a-24***." (Emphasis added.)

30. Section 53a-24, G.S. provides:

> The term "offense" means any crime or violation which constitutes a breach of any law of this state or any other state, federal law, or local ordinance of a political subdivision of this state, for which the sentence to a term of imprisonment or to a fine, or both may be imposed, except one that defines a motor vehicle violation or is deemed an infraction. ***The term "crime" comprises felonies and misdemeanors. Every offense which is not a "crime" is a violation.*** Conviction of a violation shall not give rise to any disability or legal disadvantage based on conviction of a criminal offense.

(Emphasis added).

31. Furthermore, §53a-27, G.S, provides:

> (a) An offense, ***for which the only sentence authorized is a fine***, is a violation unless expressly designated an infraction.
>
> (b) Every violation in this chapter is expressly designated as such. ***Any offense defined in any other section which is not expressly designated as a violation or infraction shall be deemed a violation,*** if not withstanding any other express designation, it is within the definition set forth in subsection (a).

(Emphasis added.)

32. The respondents cite Title 19a of the General Statutes and §51-286b, G.S., as well as chapters 10 and 11 of the Milford Code of Ordinances to support their claim that the grass complaint was compiled in connection with the detection or investigation of a crime within the meaning of §1-210(b)(3), G.S.

Anti-Blight Ordinance

33. As noted in paragraph 23, municipalities have the authority to make and enforce regulations for the prevention and remediation of housing blight. See §7-148(c)(7)(H)(xv), G.S. Section 7-148(c)(7)(H)(xv) also authorizes municipalities to:

> prescribe ***civil penalties*** for the violation of such regulations (I) for housing blight upon real property containing six or fewer dwelling units, ***of no more than one hundred and fifty dollars for each day that a violation continues. . . and not more than one thousand dollars for each day that a violation continues at a property if such violation is the third or more such violation at such property during the prior twelve-month period.*** . . .

(Emphasis added.)

34. Moreover, Section 10-19 of the Ordinances of the City of Milford, indicates that violations of the City's blight code is "***punishable by a fine*** of $100 for each day a violation continues. . . ." (Emphasis added.)

35. The clear and unambiguous text of §7-148(c)(7)(H)(xv), G.S., as well as Section 10-19 of the Ordinances of the City of Milford indicate that the breach of a municipality's anti-blight ordinance is punishable purely by a monetary fine and, thus, not a crime, but rather a *violation*, pursuant to §53a-27, G.S.

Public Nuisance Statutes and Ordinance

36. Next, the respondents claim that the overgrown grass on the complainant's property constituted a "public nuisance" pursuant to the City's Ordinances, and therefore, could be prosecuted as a crime.

37. Section 19a-206, G.S., provides in relevant part:

> (a) Town, city and borough directors of health or their authorized agents shall, within their respective jurisdictions, examine all nuisances and sources of filth injurious to the public health, cause such nuisances to be abated or remediated and cause to be removed all filth in which their judgment may endanger the health of the inhabitants. Any owner or occupant of any property who maintains such property, whether real or personal, or any part thereof, in a manner which violates the provisions of the Public Health Code enacted pursuant to the authority of sections 19a-36 and 19a-37 shall be deemed to be maintaining a nuisance or source of filth injurious to the public health. Any local director of health or a local director of health's authorized agent or an environmental health specialist authorized by such director may enter all places within such director's jurisdiction where there is just cause to suspect any nuisance or source of filth exists, and abate or remediate or cause to be abated or remediated such nuisance and remove or cause to be removed such filth.

> (b) ***When any such nuisance or source of filth is found on private property, such director of health shall order the owner or occupant of such property, or both, to remove, abate or remediate the same within such time as the director directs . . . . If such order is not complied with within the time fixed by such director*** . . . . the owner or occupant of such property, or both, shall be subject to the provisions of sections 19a-36, 19a-220 and 19a-230.

(Emphasis added.)

38. Section 19a-36(4), G.S., provides, in relevant part that "[a]ny person who violates any provision of the Public Health Code shall be guilty of a class C misdemeanor."

39. Section 19a-220, G.S., provides that:

> When any person refuses to obey a legal order given by a director of health, health committee or board of health, or endeavors to prevent it from being carried into effect, a judge of the Superior Court may issue his warrant to a proper officer or to an indifferent person, therein stating such order and requiring him to carry it into effect, and such officer or indifferent person shall execute the same.

40. Section 19a-230, G.S., provides that "[a]ny person who violates any provision of this chapter or any legal order of a director of health or board of health, for which no other penalty is provided, shall be guilty of a class C misdemeanor."

41. Section 11-13 of the City's Ordinances define "public nuisance" in relevant part to include "[a]ny premises which are unsanitary, or which are littered with rubbish or garbage, or which have an objectionable growth of weeds."

42. It is found that the conditions, as described in the grass complaint, reasonably constitute a public nuisance within the meaning of Section 11-13 of the City's Ordinances.

43. Pursuant to the clear and unambiguous language of §19a-206(b), G.S., the mere fact that a public nuisance exists is not sufficient to subject the complainant to criminal prosecution. In order for the penalties prescribed in §19a-206(b), G.S., to apply to the complainant, she would have had to failed to comply with an order issued by the director of health to remove, abate or remediate the "public nuisance" (i.e., have her grass cut) within a period of time specified in such order. See §19a-206(b), G.S.

44. It is found that the respondent City Health Department received the grass complaint on June 10, 2024.

45. It is found that after receiving the grass complaint, the matter was assigned to a city Sanitarian who, on June 10, 2024, conducted a site visit of the complaint's property, observed overgrown grass and, in a subsequent phone call, informed the complainant that he grass needed to be cut.

46. It is further found that during a follow up site visit to the complainant's property on June 17, 2024, the Sanitarian "[o]bserved that all of the overgrown grass ha[d] been cut."

47. It is found that even assuming that the Sanitarian's directive that the complainant's grass needed to be cut constituted an order of the director of health, such order did not contain a prescribed deadline as required under §19a-206(b), G.S. Moreover, it is found that the "public nuisance" (i.e., overgrown grass) was removed, abated, or remediated by the time the Sanitarian conducted his second site visit, described in paragraph 46, above.

48. It is found that the complainant did not fail to comply with an order of the director of health to remove, abate, or remediate, a public nuisance "within such time as the director directs." See §19a-206(b), G.S.

49. Accordingly, it is found that the complainant would not have been subject to any penalties, civil or criminal, pursuant to §19a-206(b), G.S.

50. The respondents also cite §19a-343, G.S., as a basis for potential criminal prosecution for a "public nuisance."

51. Section 19a-343, G.S., provides in relevant part:

> (a) For the purposes of this section and sections 19a-343a to 19a-343h, inclusive, a person creates or maintains a public nuisance if such person erects, establishes, maintains, uses, owns or leases any real property or portion of such property for (1) any of the purposes enumerated in subdivisions (1) to (6), inclusive, of subsection (c) of this section, or (2) on which any of the offenses enumerated in subdivisions (1) to (14), inclusive, of subsection (c) of this section have occurred.
>
> (b) The state has the exclusive right to bring an action to abate a public nuisance under this section and sections 19a-343a to 19a-343h, inclusive, involving any real property or portion of such property, commercial or residential, including single or multifamily dwellings, provided there have been three or more arrests, the issuance of three or more arrest warrants indicating a pattern of criminal activity and not isolated incidents or the issuance of three or more citations for a violation of a municipal ordinance as described in subdivision (14) of subsection (c) of this section, for conduct on the property documented by a law enforcement officer for any of the offenses enumerated in subdivisions (1) to (14), inclusive, of subsection (c) of this section during the three-hundred-sixty-five-day period preceding commencement of the action.
>
> (c) Three or more arrests, the issuance of three or more arrest warrants indicating a pattern of criminal activity and not isolated incidents or the issuance of three or more citations for a violation of a municipal ordinance as described in subdivision (14) of this

> subsection, for the following offenses shall constitute the basis for bringing an action to abate a public nuisance:
>
> . . .
>
> (14) Violation of a municipal ordinance resulting in the issuance of a citation for (A) excessive noise on nonresidential real property that significantly impacts the surrounding area, provided the municipality's excessive noise ordinance is based on an objective standard, (B) owning or leasing a dwelling unit that provides residence to an excessive number of unrelated persons resulting in dangerous or unsanitary conditions that significantly impact the safety of the surrounding area, or (C) impermissible operation of (i) a business that permits persons who are not licensed pursuant to section 20-206b to engage in the practice of massage therapy, or (ii) a massage parlor, as defined by the applicable municipal ordinance, that significantly impacts the safety of the surrounding area.[3]

52. Section 19a-343a, provides in relevant part:

> (a) The Chief State's Attorney or a deputy chief state's attorney, state's attorney or assistant or deputy assistant state's attorney desiring to commence an action to abate a public nuisance shall attach is proposed unsigned writ, summons, and complaint to the following documents. . . .
>
> (d) ***Such public nuisance proceeding shall be deemed a civil action. . . .***

53. Accordingly, it is found that even if the complainant had been subject to an action to abate a public nuisance[4], such action would not be criminal and could not form the basis for redacting the grass complaint pursuant to §1-210(b)(3), G.S.

Referrals to, or actions brought by, the State's Attorney

54. The respondents claim that because several provisions allow municipal health departments to refer matters to the State's Attorney (or permit the State's Attorney to bring an action), such matters are criminal prosecutions and, thus, crimes within the meaning of §1-

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[3] Sections 19a-343(c) (1) through (13), G.S., contain a number of offenses that would constitute crimes (e.g., murder, assault, and fire arms offenses); however, none are applicable to the conditions on the complainant's property as described in the grass complaint.

[4]The Commission notes that §19a-343, G.S., on its face, would not apply to the conditions described in the grass complaint as (i) no citation for a violation had been issued during the relevant time period; and (ii) overgrown grass, although defined as a public nuisance in the City's Ordinance, is not included in subdivision (14) of subsection (c) 19a-343, G.S.

210(b)(3), G.S. Specifically, the respondents cite §10-21 of the City's Ordinances and §51-286b, G.S.

55. Section 10-21 of the City's Ordinances set forth an appeal procedure for actions of the City's Anti-Blight Enforcement officer and provides:

> Appeals from the action of the Anti-Blight Enforcement Officer shall be in accordance with Section 11-24 of the City of Milford Code of Ordinances. ***At the expiration of the appeal period or conclusion of any appeal, in addition to any other remedies, the Anti-Blight Enforcement Officer may refer the matter to the State's Attorney's Office for enforcement.***

(Emphasis added.)

56. Section 51-286b, G.S. provides:

> The assistant state's attorney or deputy assistant state's attorney assigned to handle housing matters may initiate prosecutions for violations of any state or municipal housing or health law, code or ordinance either upon the affidavit of an individual complainant or upon complaint from a state or municipal agency responsible for the enforcement of any law, code or ordinance concerning housing matters.

57. The respondents' contention that any referral to, or action brought by, the State's Attorney's Officer is a criminal matter is not supported by the law.

58. As noted in paragraphs 51 and 52, above, §19a-343a, G.S., authorizes the State's Attorney's Office to commence an action to abate public nuisances; however, such actions are expressly designated as *civil* matters. See §19a-343a(d), G.S.

59. More generally, §51-277, G.S., tasks the Division of Criminal Justice[5], with prosecuting "all crimes ***and offenses*** against the laws of the state and ordinances, regulations and bylaws of any town, city, borough, district or other municipal corporation or authority." (Emphasis added).

60. As noted in paragraphs 30 and 31, above, an "offense" consists of both "crimes" (i.e., felonies and misdemeanors) *and* violations (i.e., offenses only punishable by fines). See, §§ 53a-24 and 53a-27, G.S. Significantly, "[e]very offense which is not a 'crime' is a violation." §53a-24, G.S.

61. Thus, the mere fact that a matter is referred to the State's Attorney's Office or the State's Attorney commences an action, is not dispositive in determining whether an incident constitutes a "crime" under §1-210(b)(3), G.S. Rather, as held by the court in Town of Avon,

[5] Section 51-275, G.S., designates the Chief State's Attorney as the chief of the Division of Criminal Justice.

2020 WL 5102098, at *2-3, the underlying incident *itself* must constitute a crime within the meaning of §53a-24, G.S.

62. With respect to Section 10-21 of the City's Ordinances, the respondents have not identified any authority that indicates the complainant would be subject to *criminal* prosecution for overgrown grass. Similarly, nothing in §51-286b, G.S.,[6] indicates that the action brought by the State's Attorney would be *criminal* in nature.

63. While it is possible that certain violations of state or municipal health laws could be criminally prosecuted, the respondents have identified, and the Commission has found *no* authority indicating that overgrown grass is anything other than a civil matter or a violation, punishable solely by a monetary fine, pursuant to §52a-27, G.S.

64. It is found that the respondents failed to prove that the grass complaint was compiled in connection with the detection or investigation of crime within the meaning of §1-210(b)(3), G.S.

65. Accordingly, it is concluded that the respondents violated the disclosure provisions of §§1-210(a) and 1-212(a), G.S., by redacting the name of the individual who made the grass complaint described in paragraph 2, above.

66. Based on the facts and circumstances of this case, the Commission, in its discretion, declines to consider the imposition of a civil penalty.

The following order by the Commission is hereby recommended on the basis of the record concerning the above-captioned complaint:

1. Within seven (7) days of the date of the Notice of Final Decision in this matter, the respondents shall provide a copy of the "complaint history" described in paragraph 5, above, unredacted and free of charge.

2. Henceforth, the respondents shall strictly comply with the disclosure provisions of §§1-210(a) and 1-212(a), G.S.

Approved by Order of the Freedom of Information Commission at its regular meeting of July 9, 2025.

Jennifer M. Mayo
Acting Clerk of the Commission

[6] The parties disagree whether and to what extent the State's Attorney could bring an action against an individual homeowner (as opposed to a landlord or tenant) pursuant to §51-286b, G.S. Such issue is not dispositive in the above caption matter.

PURSUANT TO SECTION 4-180(c), G.S., THE FOLLOWING ARE THE NAMES OF EACH PARTY AND THE MOST RECENT MAILING ADDRESS, PROVIDED TO THE FREEDOM OF INFORMATION COMMISSION, OF THE PARTIES OR THEIR AUTHORIZED REPRESENTATIVE.

THE PARTIES TO THIS CONTESTED CASE ARE:

YULIA RUBIN, c\o Joseph Sastre, The Law Office of Joseph R. Sastre, LLC, 852 Plainville Avenue, Farmington, CT 06032

DIRECTOR OF HEALTH, HEALTH DEPARTMENT, CITY OF MILFORD; **HEALTH DEPARTMENT, CITY OF MILFORD**; **AND CITY OF MILFORD**, c/o Attorney Jonathan D. Berchem, Office of the City Attorney, 110 River Street, City Hall, Milford, CT 06460

Jennifer M. Mayo
Acting Clerk of the Commission

FIC 2024-0418/FD/JMM/July 9, 2025