



# Home Office

## Crime Reduction & Community Safety Group

### Tilley Awards 2009 Application form

Please ensure that you have read the guidance before completing this form. **By making an application to the awards, entrants are agreeing to abide by the conditions laid out in the guidance.** Please complete the following form in full, within the stated word limit and ensuring the file size is no more than 1MB. Failure to do so will result in your entry being rejected from the competition.

Completed application forms should be e-mailed to [tilleyawards09@homeoffice.gsi.gov.uk](mailto:tilleyawards09@homeoffice.gsi.gov.uk).

All electronic entries must be received by 23:59 on **Thursday 30<sup>th</sup> April 2009**. No entries will be accepted after the 30<sup>th</sup> April. Receipt for the additional two hard copies is extended to the 5<sup>th</sup> May due to variance in postal delivery.

Any queries on the application process should be directed to Alex Birtwistle on 0207 035 4811.

#### **Section A: Application basics**

1. Title of the project: Operation Fragment
2. Award category: National problem solving award
3. Key problem that the project is addressing; Metal thefts across Somerset East neighbourhood policing area
4. Category of entry (please select which priority element the project addresses from the list on the Effective Practice Database – Metal Thefts [www.crimereduction.homeoffice.gov.uk/effectivepracticedatabase/](http://www.crimereduction.homeoffice.gov.uk/effectivepracticedatabase/)) e.g. *Theft from vehicle*

#### **Author contact details**

5. Name of application author: Sergeant 3748 Mark EDGINGTON
6. Name of organisation submitting the application: Avon and Somerset Constabulary
7. Full postal address: Street police station, West End, Street, Somerset BA16 0LG
8. Email address: [mark.edgington@avonandsomerset.police.uk](mailto:mark.edgington@avonandsomerset.police.uk)

9. Telephone number: 07974 804473

**Partnership agency lead contact details**

10. Name of secondary contact from the lead partnership agency contributing to the project: Jim GILBODY

11. Name of partnership organisation: Mendip District Council

12. Secondary contact email address: [James.Gilbody@mendip.gov.uk](mailto:James.Gilbody@mendip.gov.uk)

13. Secondary contact telephone number: 07870584050

**14. Please mark this box with an X to indicate that all organisations involved in the project have been notified of this entry** (this is to prevent duplicate entries of the same project):

**Section B: Summary of application - In no more than 400 words use this space to provide a summary of your project under the stated headings (see guidance for more information).**

**Scanning:**

Metal theft was nationally recognised as an increasing problem. The demand for metal from developing countries saw a significant increase in the value of certain metals, mainly lead and copper. Metal thefts from schools and churches are visible crimes which have the potential to increase the fear of crime within the community. Somerset East saw a significant increase in metal thefts from January 2008 with offences increasing by 95%. Theft of lead from community buildings was recently raised as a community concern at public meetings including Parish Council and NHW (Neighbourhood Watch)

**Analysis:**

Metal thefts have historically been classed as low impact crimes with little focus at a force tactical level. Analysing the reported crimes we identified vulnerable sites included schools, churches and other commercial premises and that scrap dealers were being used for disposal of such metals. The appeal of metal thefts was quite obvious in that offenders could get a quick turn around from the theft with little chance of getting caught. It was also established that scrap metal dealers had a generally poor perception of the police and a reluctance to engage. Unfortunately there was little information available on offenders due to low detections and arrests for metal thefts.

**Response:**

Phases that formed our response focused on the victim, offender, and location. Crime reduction campaigns were launched to raise awareness of metal thefts to the community. These included presentations to Church wardens, crime reduction stands and press releases. Intelligence led stop checks on suspicious vehicles and persons led to more arrests and all crimes were investigated by the SSN (Safer Stronger Neighbourhood) Teams. By conducting test sells on the metal dealers we identified offences under scrap metal legislation and restricted the flow of stolen goods. This was followed by multi agency service level agreements (SLA) between the dealers, district council, police and a monitoring and information sharing protocol.

**Assessment:**

Central to the success of Operation Fragment was cohesive partnership working between the District Council, metal dealers and police. Assessment of police data and the SLA showed reductions in metal thefts across the neighbourhood area. Feedback from criminals indicated that it was much harder to dispose of scrap. The project led to more arrests and sanctions imposed on offenders. Positive use of the press resulted in more confidence in local police following positive stories and the project was shortly rolled out to other districts and neighbouring forces.

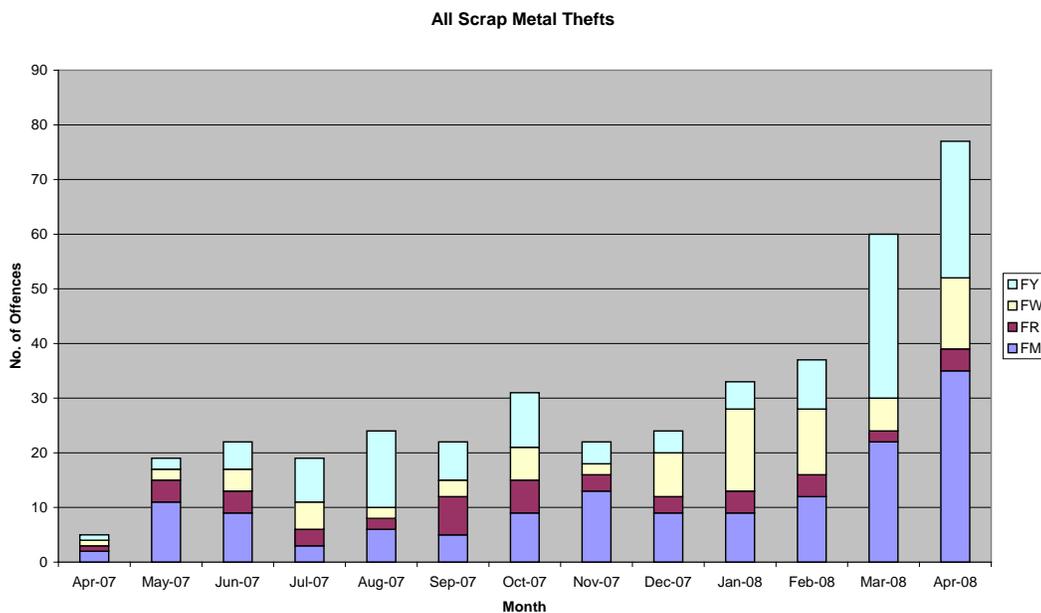
**State number of words: 400**

**Section C: Description of project - Describe the project in no more than 4,000 words. Please refer to the full guidance for more information on what the description should cover.**

**Scanning**

The Mendip West neighbourhood area is located in East Somerset with a population of 79,000 people spread over 4 town size locations. Street, Glastonbury, Wells and Shepton Mallet are surrounded by a large rural area covering 739 square kilometres. The Mendip West policing area of the East Somerset Crime Disorder Reduction Partnership (CDRP) is an area of overall low crime and is regarded as a very safe and desirable place to live. There are 2 scrap metal dealers in the neighbourhood area based in Glastonbury and Shepton Mallet.

Metal theft is now nationally recognised as an increasing problem and since June 2007 there has been a steady increase in this crime across the neighbourhood area with a dramatic increase in February and April 2008. Due to high demand from developing countries such as China, there has been a dramatic increase in the value of scrap metal, particularly lead and copper with copper fetching up to £5,000 per ton and lead £1,300 per ton. Lead is the most common metal stolen resulting in 63% of recorded metal thefts. To put this into perspective, in April 2007 there were only 5 recorded metal thefts across F district compared to 78 recorded in April 2008.



FY - Yeovil sector FW - Mendip West sector FR - Frome sector FM - Somerton sector

The above chart shows the steady increase in offences from October 2007 where on the Mendip West sector it peaked in January and April.

Metal thefts had a significant impact on the local community due to its visibility and coverage in the local media. Crimes where the victims included local schools and churches resulted in a single crime affecting many people thus increasing the fear of crime. It was therefore clear that metal thefts were impacting on other CDRP agencies. In addition to this, MDC (Mendip District Council), local media and the police have received communications from community groups that metal thefts were high on the public agenda.

Metal thefts have historically been classed a low priority crime with little focus at a force tactical level. They were not seen as a priority for the CDRP or any of its constituent agencies and police responses were primarily to record and file these crimes with a minimum amount of investigation. Metal thefts are difficult to solve with very low detection rates (2 – 3%) A major hindrance to any investigation was that metal in general carries no identifying marks making it difficult to identify it as stolen.

Because of this rapid increase in metal theft offences over a very short period of time, it was identified that action needed to be taken promptly and prioritised over other longer term projects to attempt to curtail its escalation.

To tackle this problem it was recognised that other stakeholders including MDC, metal dealers, community groups/organisations and the police needed to work together to address the below objectives.

### Objectives

- To reduce the impact of metal thefts on the community
- To create sustainable working partnerships
- To reduce levels of metal thefts below those experienced in the 1<sup>st</sup> quarter of 2007

### Analysis

### History

Traditional police methods used in response to this emerging crime trend had no effect. Historically the police response to a metal theft was to record the crime and not to routinely attend the scene to investigate. As the number of metal thefts increased, the police response changed in that officers attended the scene but there was very little information, intelligence or forensic recovery. There were no existing partnerships or strategies in place to tackle metals thefts and it was evident that the legislation in place to regulate metal dealers was not being followed by the local authority, the police and the dealers themselves. The Scrap Metal Dealers Act 1968 sets out requirements for the dealers to be registered with the local authority and to record information when trading. The legislation also provides the local authority and police with specific powers to enter premises to inspect them. This was not happening possibly because research showed that the scrap metal dealers were reluctant to engage with the police and local authority.

The source of information used to identify this problem was primarily through analysing crime figures and noting the increase in offences. As well as this, public opinions via partnership and public meetings such as NHW, school talks and PACT meetings (Partners And Communities Together) were acknowledged and emphasised the significance of the problem.

### Problem Analysis triangle

By applying the problem analysis triangle we were able to identify the extent of the problem and contributing causes. This process was very interesting and revealed many similarities most noticeable that the victims could also potentially be the offenders as well as the location.

### Victim

- Private individuals

Private dwellings were targeted primarily for lead flashing on flat roofs and general scrap located in back gardens. Lead flashing was stolen from porches which were easily accessible and visible from the road and the lead itself easy to remove. By speaking with the victims it was also evident that offences were occurring overnight and could go un-noticed for several days.

- Community buildings and commercial premises

These formed the majority of the recorded crimes, with schools and churches a fruitful target for lead flashing located on roofs. Often the crime scene was away from public view thus reducing the likelihood of the offender being caught. These had a significant impact on the community due to it being a visible crime seen by people who use these community facilities and very expensive to replace. Theft of lead flashing also resulted in flooding with huge financial implications for the victim. The impact of these visible crimes within the local community should not be underestimated. For example, a theft from a school of 100 pupils will not only have a direct affect on those 100 pupils and school staff, but also on their parents, carers and extended family that come to collect them. Also, because it is likely to be a newsworthy story it has the potential to be publicised widely and therefore affect thousands of people.

- Utility companies

Removal of copper cabling from power and communications systems not only had serious financial implications for the companies and disabled facilities for the community, but criminals were putting themselves at serious risk of being electrocuted. These locations appeared desirable due to their being secluded and the high value placed on copper.

- Scrap metal dealers

Traditionally the police have in general considered scrap metal dealers to be dishonest and willing receivers of stolen metals. In contrast the majority of scrap metal dealers are legitimate businesses at risk of innocently handling stolen property. With very little previous communication between the police and the dealers, there was a high probability that they would not be aware of the scale of this problem and the effect it had on the community.

Action to address in this area includes;

- Raise awareness of metal thefts to the community via local media and community groups (NHW, PACT)
- Impactive crime reduction campaign targeting vulnerable victims and locations.
- Thorough investigation of all metal thefts crimes to maximise opportunity in catching offenders.

### **Offender**

Information on offenders was very limited. Due to this intelligence gap we needed to rectify this in our response. A lack of engagement between the police and metal dealers was highlighted as a probable cause for this and also because metal thefts tended to occur overnight in isolated locations where the chance of being caught was minimal.

Deeper analysis indicated that the metal dealers were an easy disposal opportunity for suspects. Unlike other property, scrap metal can only be disposed of at limited locations such as scrap dealers. The limited community intelligence available suggested that the two local metal dealers, Thomas's and Rossiters were taking in stolen scrap.

Other agencies' failures were also part of this problem and its escalation. A lack of previous partnership working between the metal dealers, local authority and police allowed problems to escalate with no tactical options or solutions in place. Research showed that this was not just the case locally but also with other forces across the country.

Action to address in this area includes:

- Bridge the large intelligence gap regarding offenders and vehicles.
- Information sharing/partnership working with the scrap metal dealers.
- Actively target offenders, vehicles and locations.
- Reduce appeal of metal thefts to offenders via scrap metal dealers.

### **Location**

Having analysed the location we came up with 3 main aspects.

- Crime scene
- Scrap metal dealers
- Routes from crime scene to scrap metal dealers

The crime scenes were primarily isolated locations such as Churches, Schools and commercial businesses such as banks and shops. They were out of public view allowing suspects to remove the metals with no disruption. Private dwellings were slightly more high risk with more chance of the suspect being seen but these offences occurred overnight to reduce this risk.

Innocently or not it was believed the scrap metal dealers were the main disposal method for stolen metals. Because of difficulties in identifying metals, there was little chance of them being prosecuted for handling stolen goods and no real deterrent. The limited contact the police had up until now indicated that the dealers were not recording the relevant information as per the Scrap Metal Dealers Act legislation.

The location formed a significant part of this problem and was an area where we could proactively have the most impact. If the disposal of stolen goods could be eliminated/reduced then this would make metal less desirable to criminals and also provide more chances of them being caught. The metal dealers needed to be regulated as per the legislation and test sells of scrap metal was a potential tactical option to check that the required records were being maintained. Vastly improved partnership working would be essential to gain trust and confidence with the

dealers to allow information sharing on suspects and vehicles to take place and to make them aware of this

increasing national problem.

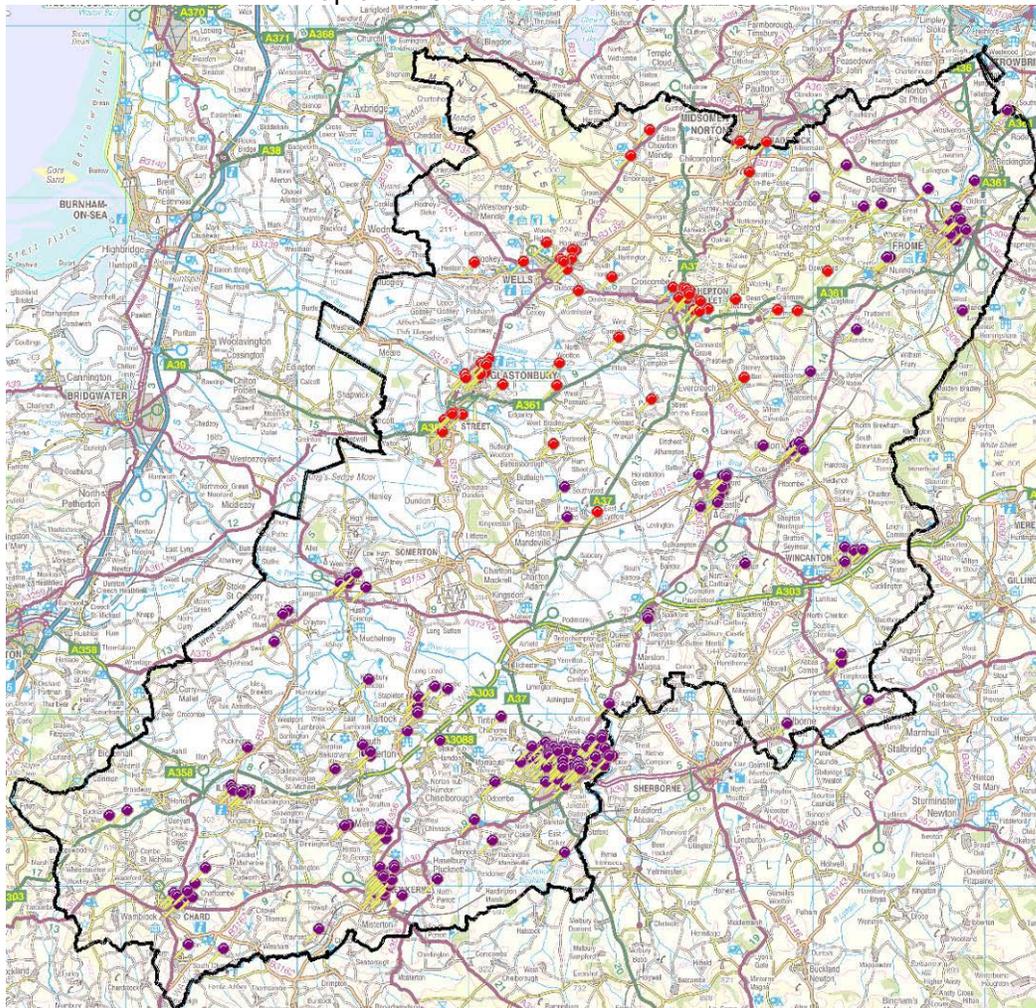
We also identified that because of the high probability of offenders having to use a scrap metal dealer for disposal of stolen goods there were some main artillery roads that they would have to use to get to them. This would narrow down the appeal of metal thefts if a police presence was more visible in these areas and also help police patrols to target offenders more effectively.

Action to address in this area includes:

- Increase partnership working between metal dealers, local authority and police.
- Formulation of service level agreements between partner agencies to include CCTV requirements and photo ID.
- Tighter regulation of scrap metal dealers and legislation to be used effectively.
- Actively target routes to and from scrap metal dealers.

The below map shows the spread of metal theft crimes from April 2007 to April 2008. Yeovil, Crewkerne, Chard, Glastonbury, Shepton Mallet and Frome are all areas where metal thefts were most common. Scrap dealers are located in all of these towns which was further evidence to suggest that offenders were using the dealers for easy disposal.

Map of F district Somerset East



Red = Mendip West Sector

Purple = rest of district

Having applied the problem analysis triangle we identified that the metal dealers, although potentially victims, by unknowingly handling stolen goods dealers were also becoming offenders through a lack of due diligence and failing to maintaining the correct records. They were also most certainly the location aspect of this problem and the primary disposal method for stolen metal.

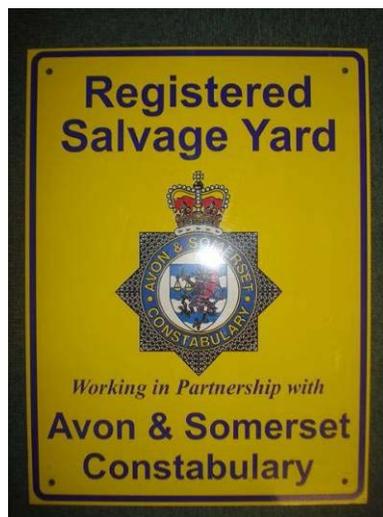
## Response

The response phase of this project started in April 2008 with the creation of Operation Fragment. This operation focused on the offender and location aspects of the problem analysis triangle. Having thoroughly analysed the information available we identified that one of our best methods of addressing this problem would be to initially focus on the location. As stated above, because of the limited disposal methods for scrap metal, offenders would be far more likely to pass through the scrap metal dealers. Prior to April, we consulted MDC to seek their views and ideas and kept them involved throughout the whole process.

Our response started with checks on the metal dealers to see if they were adhering to scrap metal legislation. In company with MDC we conducted test sells at the two metal dealers on the sector. A plain clothes officer would obtain a quantity of scrap metal and have it weighed for value purposes. The officer would then sell this to the dealer and provide them with whatever information was requested. Having been informed of the test sell operation, uniformed officers then conducted an inspection of the dealer, checking their books and records as per the legislation. (This approach is similar to that used by trading standards when conducting test purchasing operations in licensed premises.) These checks revealed not only criminal offences with incomplete records but also incorrect/bogus information recorded such as the incorrect name and address. Inspections of the yards also identified that they were keeping metals such as beer kegs. This is also illegal as beer kegs should always be returned to their owners e.g. the breweries and not taken as scrap. The dealers were informed of these offences and invited in for partnership meetings at a later date.

The meetings that followed were chaired by MDC and were very positive. In these meetings we discussed the extent of the problem, the impact it was having on the wider community and also what responsibility each partner had to help reduce it. This resulted in Service Level Agreements (SLA) being drawn up between the dealers, MDC and police and stipulated specific requirements as follows;

- Adherence to the Scrap Metal Dealers Act legislation
- Photo I.D to be produced by customers trading in scrap metal and full name, address and vehicle index recorded.
- Thumb print to be provided in the absence of the above.
- Retention of CCTV for a period of 28 days.
- To display "Registered Salvage Yard" partnership sign and accompanying notices.



Once the SLA's were put in place they were followed up by weekly visits by the SSN team to discuss any suspicious incidents and check the effectiveness of the agreements. These agreements assisted the police not just to actively target offenders but also provided the dealers with a level of protection. They would come in for little criticism if having conducted all the relevant checks, stolen metals were still to pass through their business and help reduce their dishonest reputation.

With information provided by the metal dealers we were then able to formulate more directed action regarding stop checks of suspicious persons and vehicles. Areas targeted included routes to and from the scrap dealers and also vulnerable locations such as local Churches, Schools and industrial estates as the statistics indicated these were most vulnerable.

The costs involved in this first phase of the project were minimal. The Registered Salvage Yard signs were provided by MDC and the metal for the test sells were sourced from local donations. The test sells were conducted over a 2 day period by the SSN teams with no additional policing resources of expenses.

The next phase of the project focused on the victim and crime reductions aspects. In partnership with the crime reduction officer, local authority and the CDRP a crime reduction campaign was launched. This included;

- Weekly information and advice via the local media.
- Crime reduction visits and surveys at vulnerable locations including Churches and Schools.
- Crime reduction notice boards funded by the CDRP. These were displayed at key locations such as commercial sites and builders yards
- Implementation of SMART WATER lead/metal marking.
- Talks to community groups including all NHW co-ordinators.

All metal theft crimes were tagged on the Force crime recording system and allocated to the SSN teams for a thorough investigation. This included officer attendance at the crime scene within 24hrs of it being reported via the Force Service Centre and opportunities for CSI (Crime Scene Investigator) considered in every case. Crime reduction advice would be given regarding SMART WATER when replacing stolen metal and house to house enquires/crime reduction surveys conducted.

Once we had formulated the response phase it was simultaneously rolled out across the other 3 neighbourhood policing areas on Somerset East. This including towns such as Chard, Crewkerne, Yeovil, Somerton and Frome where other scrap metal dealers were situated with the same problems. We identified that by simply implementing this operation at a very local neighbourhood level, there was a probability that we could simply displace the problem to a neighbouring sector. By looking at the bigger picture and implementing it across a large area we would make metal disposal much more difficult and less appealing to the criminals thus hopefully reducing the problem.

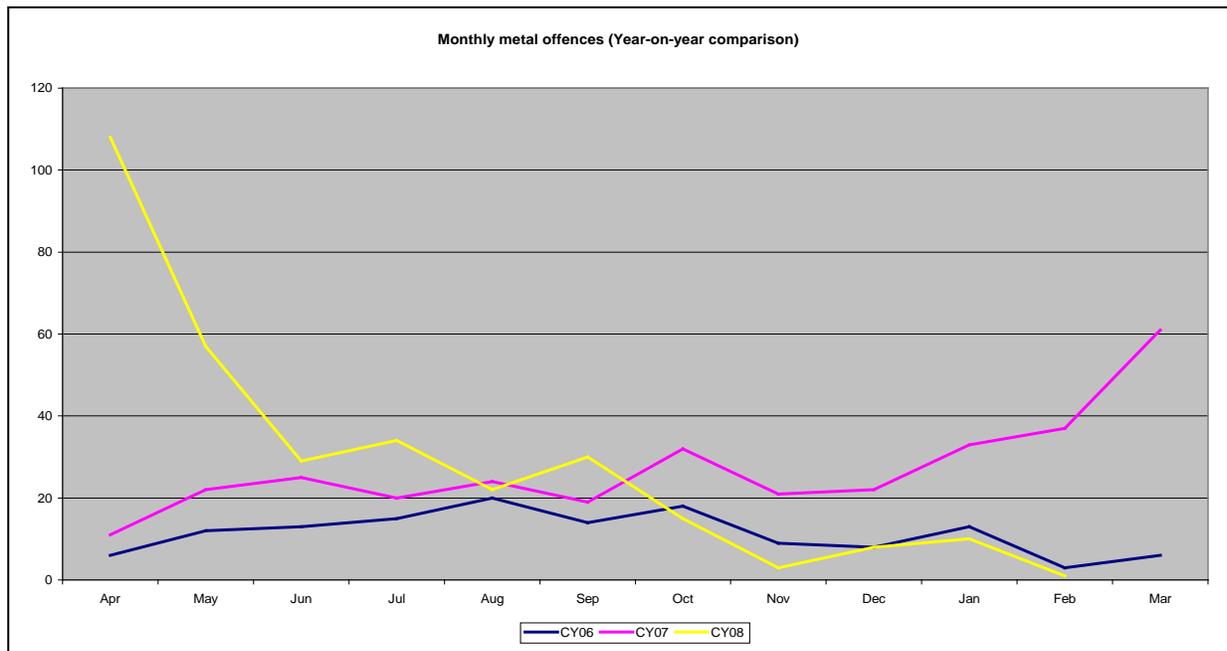
### **Assessment**

Evaluation of this project was undertaken regularly, enabling the team to determine and direct the development of the different phases accordingly.

It was quite evident at an early stage that this project had a positive impact on both the number of recorded offences and disruption to the criminals. Weekly checks of the metal dealers showed a significant improvement in their compliance with the Scrap Metal Dealers Act legislation and service level agreements, not withstanding a high number of customers were simply turned away when unable to provide the required identification. Feedback from the dealers was very positive in that there was very little negative impact on their business in terms of financial costs and they were pleased with the protection the SLA provided. The metal dealers stated that the metal passing through their business from a dishonest source was far more damaging to them in terms of reputation and potential prosecution than the financial loss of not taking that metal in.

Because of the improved working relationship between the metal dealers, intelligence on suspects and suspicious vehicles started to come to police attention. This resulted in over 60 stop checks and 6 arrests in the months of April and May alone. Out of these 4 were charged with metal theft offences. Of those offenders interviewed, a common statement made was that there was very little point in stealing scrap metal as they are unable to dispose of it. As stated above unlike other stolen property, metal can only be disposed of at very limited locations. By reducing/removing this opportunity we disrupted criminal activity and made the appeal of metal thefts far less attractive.

Somerset East saw a dramatic reduction in offences in the Months of April and May. Offences reduced from over 100 down to 62. This further reduced over the next 2 months down to 25 by mid June followed by a gradual reduction with only 4 recorded in October. These results were achieved when metal prices remained at an all time high and can be attributed to this targeted partnership approach.



The table above shows the number of recorded crimes dramatically drops in the months of April and May 2008. This then leveled off with a steady decrease in offences for the remainder of the year to levels below that experienced in 2005 (CY05). You can also see that Operation fragment had a positive impact on recorded crimes at a very early stage.

### Case Study

This project and its success can be best described in this case study.

In May 2008 Brookside Community Primary school in Street was the victim of a metal theft. Offenders had taken lead flashing from a flat roof of a brand new building costing over £2,000 pounds to replace. This theft impacted on the community as many parents and teachers saw the damage and it was reported widely in the local press. The local Beat Manager conducted the investigation where there was no forensic evidence and no witnesses to the theft. House to House enquires resulted in a vague description of a motor vehicle seen leaving the school the day of the incident with only the first letter of the index and colour available. The officer obtained a description and approximate quantity of the metal stolen and attended the local metal dealer to check their documentation as per the SLA. The checks revealed that the vehicle had been in that day and the dealer was able to provide the full description, make and index number of the vehicle as well as the name and address of the seller/offender. This resulted in 3 arrests and 2 offenders charged who were later convicted by the court. The school was able to update the children throughout the whole process about what was happening and that 2 people were brought to justice. This impacted on the children leaving a lasting positive impression of the police.

Quote from Claire Axten, Head teacher of Brookside School taken from the Mid Somerset gazette in August 2008.

“I think that the police have done a fantastic job. It’s really good that someone has been caught. The building was brand new and although we did have insurance, it was money that could have been spent on the children in our care rather than on repairs. Having a local policeman has been wonderful, the police were in touch all of the time and keeping us up to date on the developments”

After Operation Fragment was rolled out across Somerset East, it was then adopted across the rest of the force area. Very quickly we started to receive enquires from neighbouring forces that were still suffering from metal thefts and had no processes in place to address them. Both Dorset Police and Devon and Cornwall Constabulary visited the Mendip West sector to see Operation Fragment in full flow. This was then taken back to their respected forces to be implemented.

The Mendip West SSN team later attended a national ACPO (Association of Chief Police Officers) scrap metal seminar to carry out a presentation to senior officers and partner agencies. Here it was recognised as best practice and taken back to other forces.



From left to right – Pc Matt Slade, Jim Gilbody MDC Licensing Officer, Kristy Blackwell – MDC Community Safety Officer, PC Mark Pople, Chief Superintendent Nikki Watson – District Commander.

After giving a joint presentation on Operation Fragment, the scheme was hailed as national best practice by ACPO. Mendip West Sergeant Mark Edgington said they were delighted other forces were queuing up to find out more about Operation Fragment. “Thanks to Operation Fragment and the conscientious work by all the partners involved including the scrap metal dealers, Mendip District Council, and our officers, we have seen a sizeable reduction in the number of metal thefts across the area” he said. “That has led to other forces taking note of what we have been doing here.” “We have already had enquires from our neighbouring forces in the South West who want to roll out the scheme across the region.”

Quotes from partner agencies involved in this project;

Joe Thomas – JC Thomas and Sons.

“This metal theft initiative has worked very well and we are pleased with the outcome. It didn’t take very long at all for customers to get the message as we kept getting people ringing us asking what identification they needed to bring in to sell to us. I think this has definitely put off a number of rogue traders coming in to sell to us which is great’

Kristy Blackwell – Mendip District Council Community Safety Officer

“Quite simply, Operation Fragment is an excellent example of how real results can be achieved when partners work together to address a problem in the community”

Following this project, metal thefts are now no longer a problem across Somerset East. Because of Operation Fragment, we now have sustainable tactical options and partnership working practices in place should a similar problem arise in the future. Because of these strong partnerships, if a problem was to occur its escalation and scale is likely to be minimal compared to that experienced in early 2008.

**State number of words used: 3996**

**Section D: CDRP/CSP Authorisation** – Applications submitted by eligible Police forces outside England & Wales should be authorised by the BCU Commander or individual of equivalent rank.

15. Name of CDRP/CSP:

Mendip and South Somerset Community Safety Partnership

16. Name of CDRP/CSP Chairperson:

David Thomson

17. Contact email address:

[david.thomson@mendip.gov.uk](mailto:david.thomson@mendip.gov.uk)

18. Government Office (entries from Wales should state Home Office Crime Team) area e.g. GO East Midlands:

South West

19. Can you confirm that the partners listed carried out the project as stated?

**Yes**

**No**

20. Can you confirm that the details stated are factually correct?

**Yes**

**No**

21. Is there any reason why the contents of this application should not be made publicly available? If so please state the reason/s and refer to guidance concerning sharing Tilley application submissions.

**Yes**

**No**

22. Please add any comments in support of this application:

Metal thefts are crimes against the community. This is a good example of the community getting together to reduce the crime and remove the community blight. This work has already been shared with other areas who have seen the benefits of the joint approach, and I commend the project and congratulate the individuals who have pulled it together

**Section E: Pre-marking** - this page will not be provided to sift teams to prevent any bias in marking.

23. Has this project been submitted to the pre-marking service?

**Yes**

**No**

24. If yes please state pre-marking reference:

**Checklist for Applicants:**

1. Have you read the process and application form guidance?
2. Have you completed all five sections of the application form in full including seeking authorisation from your CDRP/CSP Chairperson?
3. Have you checked that your entry addresses all aspects of the judging criteria?

4. Have you advised all partner agencies that you are submitting an entry for your project?
5. Have you adhered to the formatting requirements within the guidance?
6. Have you checked whether there are any reasons why your project should **not** be publicised to other police forces, partner agencies and the general public e.g. civil or criminal proceedings pending in relation to your project?
7. Have you inserted your project name as a footer note on the application form? Go to View-Header and Footer to add it.
8. Have you saved you application form as a word document and entitled your message '**Tilley 09 entry (followed by project name in brackets)**' before emailing it?

Once you are satisfied that you have completed your application form in full please email it to [Tilleyawards09@homeoffice.gsi.gov.uk](mailto:Tilleyawards09@homeoffice.gsi.gov.uk) by 30<sup>th</sup> April 2009.

Two hard copies (in colour if colour charts/diagrams etc have been used) must also be posted to the Tilley Awards Team at Home Office, CRCSG Communications Unit, 4th Floor, Fry Building (SE Quarter), 2 Marsham Street, London, SW1P 4DF and be received no later than the 5<sup>th</sup> May 2009.