



defendiendo los derechos y libertades civiles

Ethnic profiling in Spain: a generalized and unresolved police practice

Submission for the Fifth Report on Spain by the European Commission against Racism and Intolerance (ECRI)

May 2017

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1. Introduction

This report is submitted after the visit to Spain by the delegation of the European Commission Against Racism and Intolerance (ECRI) during its fifth monitoring cycle. It details the extent of ethnic profiling by police in Spain and explains how the measures adopted by the authorities over the last year to address this problem are still insufficient to eradicate these discriminatory police practices.

ECRI General Policy Recommendation No. 11 on combating racism and racial discrimination in policing, defines racial profiling as “[t]he use by the police, with no objective and reasonable justification, of grounds such as race, colour, language, religion, nationality or national or ethnic origin in control, surveillance or investigation activities”. According to this General Policy Recommendation, this practice should be defined and prohibited under national law, as it constitutes ethnic discrimination, and the authorities should adopt a series of measures in order to eradicate racial profiling.

In its fourth report on Spain, adopted on 7 December 2010 and published on 8 February 2011¹, the ECRI expressed its concerns “about consistent reports of large-scale unmotivated identity checks being carried out with increasing frequency in neighbourhoods with a high presence of foreign citizens”² and urged Spain to “ensure an effective prohibition of all racial profiling practices by the police throughout the country, taking into account ECRI’s General Policy Recommendation No. 11 on combating racism and racial discrimination in policing, which provides guidance on defining and prohibiting racial profiling”³.

Since the adoption of this report, some improvements have been introduced within the police directives and the legal framework governing police stops. However, these measures have proven to be insufficient to combat ethnic profiling, as these discriminatory police practices persist nowadays. Therefore, Spain should be urged to adopt effective measures to eradicate these discriminatory police practices.

2. Ethnic profiling in Spain since ECRI’s last report: a documented problem

A number of civil society organizations, national and international human rights organizations, and universities have documented and verified over the last years the existence of ethnic profiling practices within police departments in Spain, especially National Police officers.

¹ European Commission Against Racism and Intolerance (ECRI), Report on Spain – Fourth Monitoring Cycle [CRI(2011)4].

² Idem, para. 201.

³ Idem, para. 204.

a. *Civil society reports*

In December 2011 Amnesty International⁴ published its report, “Stop Racism, not People. Racial Profiling and Immigration”, which provided “compelling evidence that discriminatory identity checks and police raids in Spain are a reality that can no longer be ignored by the Spanish authorities”. According to Amnesty International, “the stops are not only carried out in public places as allowed under the law, but also in certain *locutorios* and other places which appear to be selected based on the racial or ethnic characteristics of the people who frequent them”⁵.

Several grassroots organizations have also documented the existence of ethnic profiling practices. This is the case of Ferrocarril Clandestino⁶, Grupo Inmigrapenal⁷ or the Brigadas Vecinales de Observación de Derechos Humanos (in English: “Neighborhood Brigades for the Observation of Human Rights”)⁸. It should be noted that individuals and organizations that observe and/or document the police stops have been intimidated, harassed and faced criminal proceedings for disobedience or other administrative charges. In fact, the Brigadas Vecinales de Observación de Derechos Humanos recently brought a case of an abusive fine imposed to one of its activists before the UN Human Rights Committee⁹.

Recently, the Asociación Pro Derechos Humanos de Andalucía (APDHA) published a report¹⁰ after conducting a research in Granada (Andalucía) jointly with the

⁴ Amnesty International, *Stop Racism, not People. Racial Profiling and Immigration Control in Spain*, 2011. Available at: <https://www.amnesty.org/download/.../eur410112011en.pdf>

⁵ Idem, p. 34.

⁶ Ferrocarril Clandestino, *Informe de Investigación sobre Controles, Identificaciones y Detenciones*, 2010. Available at: <http://www.inmigrapenal.com/Areas/Detenciones/Documentos/InformeFerrocarrilRedDetenciones.pdf>

⁷ Grupo Inmigrapenal, *Controles de identidad, detenciones y uso del perfil étnico en la persecución y castigo del inmigrante “sin papeles”: ilegalidad e inconstitucionalidad de determinadas prácticas policiales*, 2011. Available at: <http://www.inmigrapenal.com/Areas/Detenciones/Documentos/INFORMEREDADASDETENCIONES01032010.pdf>

⁸ The Brigadas Vecinales de Observación de Derechos Humanos is an organization based in Madrid that documents and denounces identity checks that disproportionately target persons belonging to ethnic minorities. See their reports: *Brigadas Vecinales de Observación de Derechos Humanos, Controles de Identidad Racistas en Madrid, 2010-2011*, available at: http://brigadasvecinales.org/wp-content/uploads/2011/11/INFORME_BRIGADAS_2011.pdf; *Brigadas Vecinales de Observación de Derechos Humanos, Cuando la vulneración de derechos se normaliza. Controles de identidad Racistas en Madrid, 2011- 2012*, available at: <http://brigadasvecinales.org/wp-content/uploads/2012/12/Informe-Brigadas-Vecinales-2011-2012.pdf>; and *Brigadas Vecinales de Observación de Derechos Humanos, Persecución y acoso policial. La persistencia de los controles de identidad por perfil étnico*, 2015. Available at: <http://brigadasvecinales.org/wp-content/uploads/2015/05/Tercer-informe-BVODH.pdf>

⁹ The application before the UN Human Rights Committee is available here: <http://brigadasvecinales.org/wp-content/uploads/2017/04/DENUNCIA-28-03-17-BVODH-al-Comite-DDHH-1.pdf>

¹⁰ Asociación Pro Derechos Humanos de Andalucía (APDHA) e Instituto de la Paz y de los Conflictos de la Universidad de Granada, *Identificaciones basadas en perfil étnico en Granada. Estudio realizado*

Peace Institute of the University of Granada, using a methodology that included direct observation of the stops performed by the National Police at the main bus station of the city. According to this report, black people are 42 times more likely to be stopped by the police than white people; while Gitano appearance (Spanish Roma) people are 12 times more likely; people with North-African appearance are 10 times more likely, and people with Latin-American appearance are 8 times more likely to be asked for their ID by the police than white people.

Zeshan Muhammad, a victim of a discriminatory ID check carried out by a National Police officer, recently brought his case before the European Court of Human Rights¹¹ with the support of SOS Racisme Catalunya and the Open Society Justice Initiative. The officer that stopped him referred to the colour of his skin, as documented by a direct witness of the stop. Before bringing this case to the European Court, both the Spanish High Court (Audiencia Nacional) and the Constitutional Court (Tribunal Constitucional) had dismissed or declared inadmissible his case¹².

b. Academic report of the University of Valencia

In 2013 the Human Rights Institute of the University of Valencia published a report¹³ analyzing the results of a survey conducted by the leading firm Metroscopia. The survey used telephone and personal interviews to ask 2,800 people across Spain a range of questions about encounters with police, and covered both street stops and vehicle stops. While only 6 percent of people with Caucasian European appearance answered they had been stopped by the police in the past two years, the percentage of each minority group who reported being stopped was: 22 percent in the case of Andean-Latin American appearance, 39 percent in the case of persons of Afro-Latin American appearance, 45 percent in the case of persons of North African appearance, and 60 percent in the case of persons of Gitano appearance.

It should be noted that, despite the higher likelihood of being stopped, there was no difference in arrest or summons rate across ethnic appearances, nationality, or religion, indicating that the use of perceived ethnic features as the basis to stop someone is not an effective indicator for quality law enforcement or improving citizen security.

c. Reports of national and international human rights bodies

mediante investigación y entrevistas directas, 2016. Available at: <http://www.apdha.org/media/granada-identificaciones-etnicas-2016-web.pdf>

¹¹ See application to the European Court of Human Rights here: <https://www.opensocietyfoundations.org/sites/default/files/echr-zeshan-muhammad-v-spain-20170508.pdf>

¹² See a summary of the case, here: <https://www.opensocietyfoundations.org/litigation/zeshan-muhammad-v-spain>

¹³ José García Añón, Ben Bradford, José A. García Sáez, Andrés Gascón Cuenca y Antoni Llorente y Ferreres, *Identificación por perfil étnico en España. Informe sobre experiencias y actitudes en relación con las paradas policiales*, 2013. Available at: http://www.uv.es/garciaj/pub/2013_perfil_etnico.pdf

Since the ECRI adopted its last report, many international, regional and national human rights bodies have expressed their concerns over the persistence of discriminatory policing practices in Spain. In 2013 the UN Special Rapporteur on Racism visited Spain, and concluded that “ethnic profiling by law enforcement agents continues [despite the new directives adopted by the National Police, as explained in Section 4.a below]] to be a persistent and pervasive problem, with significant adverse impacts on police/community relations and the enjoyment of the rights of the individuals targeted”¹⁴.

Additionally in 2013, the Committee of Ministers of the Council of Europe issued a resolution following the monitoring process of Spain before the Advisory Committee on the Framework Convention for the Protection of National Minorities, stating that “ethnic profiling by the police continues to be reported as a widespread practice: persons belonging to some minority groups are disproportionately stopped and searched, especially on public transport and in the street”¹⁵. In 2016 the Committee of Ministers urged Spain to “continue to implement measures to train members of police forces to work effectively in a diverse society and to prevent ethnic profiling”¹⁶.

The UN Human Rights Committee indicated in 2015 that, although a new law governing police stops had been adopted (as explained in Section 4.a) below), “the Committee is concerned at the continuing use of police identity checks based on racial and ethnic profiling targeting certain ethnic minorities”. It called on Spanish authorities to adopt “all necessary measures to effectively reduce and eliminate the use of ethnic profiling by the police and law enforcement officials by providing more training for its officials on such issues as cultural awareness and the inadmissibility of the use of ethnic profiling”¹⁷.

Similarly, the UN Committee for the Elimination of Racial Discrimination expressed concern for the persistence of identity checks based on ethnic or racial profiling despite the new law¹⁸ and urged the authorities “to adopt the necessary measures to definitely bring this practice to an end”¹⁹.

¹⁴ UN Human Rights Council, *Report of the Special Rapporteur on contemporary forms of racism, racial discrimination, xenophobia and related intolerance, Mutuma Ruteere – Addendum: Visit to Spain*, [A/HRC/23/56/Add.2], 6 June 2013, para. 51. Available at: http://www.ohchr.org/Documents/HRBodies/HRCouncil/RegularSession/Session23/A-HRC-23-56-Add-2_en.pdf

¹⁵ Council of Europe Committee of Ministers, *Resolution CM/ResCMN(2013)4 on the implementation of the Framework Convention for the Protection of National Minorities by Spain*, 10 July 2013. Available at: <http://www.coe.int/en/web/minorities/spain>

¹⁶ Council of Europe Committee of Ministers, *Resolution CM/ResCMN(2016)10 on the implementation of the Framework Convention for the Protection of National Minorities by Spain*, 6 July 2016. Available at: <http://www.coe.int/en/web/minorities/spain>

¹⁷ UN Human Rights Committee, *Concluding observations on the sixth periodic report of Spain* [CCPR/C/ESP/CO/6]. Available at: http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CCPR%2fC%2fESP%2fCO%2f6&Lang=en Para. 8.

¹⁸ UN Committee for the Elimination of Racial Discrimination, *Concluding Observations on Spain*, [CERD/C/ESP/CO/21-23], 13 May 2016, para. 27. Available at:

The Spanish Ombudsperson has received a high number of complaints filed by victims and witnesses of discriminatory identity checks performed by officers of the National Police²⁰. In 2013 it issued a recommendation to the Police General Directorate with a set of measures that should be adopted in order to address ethnic profiling, including the introduction of stop forms, the gathering of disaggregated data on ID checks, and the setting up of a specific complaint mechanism²¹. As explained in Section 4.c) below, the Police General Directorate has undertaken a commitment to implement stop-forms.

3. Ethnic profiling in the context of the fight against violent extremism

In addition to the ethnic profiling practices carried out in the context of general law-enforcement and migration control activities, concerns arise regarding profiling against Arab and Muslim communities in Spain as a consequence of the new policies to combat violent extremism. In 2015 the Government approved the Strategic National Plan to Counter Violent Radicalization (“Plan Estratégico Nacional de Lucha contra la Radicalización Violenta”) ²².

One of the key measures of this plan is a new procedure to denounce “violent radicalization” conducts. For this purpose, the Government launched in December 2015 a website (www.stop-radicalismos.es) and set up a free telephone number (900822066) through which any person can “*communicate any incident or problem that could possibly arise in the initiation or the development of a radicalization process or of extremist conducts*”²³ or to “*communicate the extreme situation of radicalization of an individual or their possible disappearance and exit/arrival from/to the national territory to/from zones of war*”²⁴.

It should be noted that, although apparently this website is allegedly directed to any type of “extremist” conduct, it seems to target, in particular, Islamic or Muslim

http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=INT%2fCERD%2fCOC%2fESP%2f23910&Lang=en

¹⁹ Idem, para. 28.

²⁰ Defensora del Pueblo, Annual Report 2013, Volume I, p. 225-226. Available at https://www.defensordelpueblo.es/wpcontent/uploads/2015/05/2013_Informe_Anual_Vol_I_Informe_2013.pdf

²¹ Defensora del Pueblo, Recommendation 45/2013, 17 April 2013, Annex E.1, p. 154-156. Available at:

https://www.defensordelpueblo.es/wpcontent/uploads/2015/05/2013_Anexo_E_1_Recomendaciones_2013.pdf

²² The Plan is available here: <http://www.interior.gob.es/documents/642012/5179146/PLAN+DEFINITIVO+APROBADO.pdf/f8226631-740a-489a-88c3-fb48146ae20d>

²³ In Spanish, quoting literally from www.stop-radicalismos.es: “comunicar cualquier incidencia o problemática que, posiblemente, suponga el inicio o desarrollo de un proceso de radicalización o de gestación de conductas extremistas”.

²⁴ In Spanish, quoting literally from www.stop-radicalismos.es: “comunicar la extrema situación de radicalización de un individuo o su posible desaparición y salida/entrada del territorio nacional hacia/desde zonas de conflicto bélico”.

extremism. In fact, the website is only available in Spanish and in Arabic. It is also surprising that, through this system, it is possible to file an anonymous report before the police, while in any other case any person wishing to report any criminal act is required to provide their personal data, in order to prevent false allegations.

This measure could have a disproportionate impact on Muslim and Arab communities, which could lead to ethnic profiling, discrimination and stigmatization of these communities. It is worrying that the communication channels with the police, allowing anonymous reporting, can lead to false allegations against people belonging to these targeted communities; thus entailing impunity and lack of redress.

The Ministry of the Interior recently made public²⁵ its first Balance of the Stop-Radicalismos campaign, reporting that 3,179 “communications” had been received through this channel, out of which only 63 were considered relevant for police investigation purposes, ultimately resulting in the detention of three individuals for the offence of glorification of terrorism or hate crimes. This data appear to suggest a lack of real effectiveness of this tool.

4. Response of the authorities to the problem of ethnic profiling

a. Insufficient measures adopted at the national level

Since the adoption of the last ECRI report, the Spanish authorities have taken initial steps to address ethnic profiling. In early 2012, the General Directorate of the Police, which governs the activities of the National Police, adopted a new guideline directive (Circular 2/2012)²⁶ providing that law enforcement activities targeted at foreigners should avoid any practice that could lead to undue restrictions on the rights and freedoms of immigrants. It also states that the establishment of quotas for identity checks of foreigners is illegal and that the police should avoid indiscriminate actions based solely on ethnic criteria. However, these provisions are not contained in the part of the directive that sets out binding instructions to the police. Moreover, the binding provisions of the directive do not include any clear prohibition of racial discrimination. Instead it still allows police officers to exercise broad discretion in determining what might constitute grounds for stopping someone to check their identity.

In addition, a new Organic Law on Citizen Security²⁷, which governs police ID checks and searches was approved in March 2015, entering into force in July 2015.

²⁵ See the news, Cadena Ser: “Balance de ‘Stop Radicalismos’ en Fuenlabrada”, available at: http://cadenaser.com/emisora/2017/04/04/ser_madrid_sur/1491285121_481366.html

²⁶ Available at: <http://www.migrarconderechos.es/file/219919>

²⁷ *Ley Orgánica 4/2015, de 30 de marzo, de protección de la seguridad ciudadana*, available at: https://www.boe.es/diario_boe/txt.php?id=BOE-A-2015-3442 ID checks are regulated in Article 16.1 of the Law.

This law lightly improved the previous Act²⁸, as it narrows the circumstances in which an ID check can be performed and it establishes that these police practices have to respect the principles of proportionality, equality of treatment and non-discrimination on the grounds of, *inter alia*, ethnic and racial origin. Nevertheless, the 2015 law does not establish the reasonable suspicion as a requirement to perform a stop and does not define, nor prohibit, specifically ethnic profiling in police activity.

In short, none of these measures has been effective to eradicate ethnic profiling; as evidenced by the fact that these discriminatory police practices persist after the implementation of the police new guidelines and the entry into force of the new legislation, as documented by civil society and human rights bodies reports (See Section 2) above).

b. Promising practices at the local level

In 2007-2008 the European STEPSS (Strategies for Effective Police Stops and Search) project²⁹ was implemented with the support of the Open Society Justice Initiative in three police forces in Spain: the local police of Fuenlabrada, the local police of Gerona and the *Mossos d'Esquadra* (Catalan police force) department in Gerona. They developed tools to monitor the use of identity checks and stop and search powers (mainly, through the use of stop-forms) and determine whether they disproportionately affected minority communities, and assessed their effectiveness in detecting and investigating crime or other administrative offences.

In Fuenlabrada in particular the project produced very positive results. Over the six months of data gathering, the police reduced the disproportionality in the rate at which they were stopping all persons of immigrant origin. The rate at which officers conducted stops overall fell by well over half, while the percentage of their stops that produced positive outcomes increased by nearly three times. In Fuenlabrada, police managers and supervisors also used the stop data to supervise individual officers more closely, and to examine the impact of specific operations and personnel deployments. The data enabled them to factor disproportionate ethnic impacts into their strategic decision-making and reduce unfair policing while enhancing efficiency. The project demonstrated that unlawful discrimination can be reduced and police efficiency improved with the necessary commitment from police managers and supervisors. After the six months pilot project police managers in Fuenlabrada decided to keep using the stop forms.

²⁸ *Ley Orgánica 1/1992, de 21 de febrero, sobre Protección de la Seguridad Ciudadana*, available at: <https://www.boe.es/buscar/doc.php?id=BOE-A-1992-4252> Specifically, ID checks were regulated in Article 20.1 of the Law.

²⁹ See Open Society Justice Initiative, *Addressing Ethnic Profiling by Police. A Report on the Strategies for Effective Police Stop and Search Project*, 2009, available at: https://www.opensocietyfoundations.org/sites/default/files/profiling_20090511.pdf; and Schmitt, M. y Pernas, B., *Pasos hacia la igualdad. El Proyecto STEPSS (Strategies for Effective Police Stop and Search) en España*, 2008, available at: http://www.gea21.com/_media/publicaciones/el_proyecto_stepss.pdf

The *Plataforma por la Gestión Policial de la Diversidad* (PGPD)³⁰, a network of police representatives and civil society organizations, was created in 2010 to promote improved and non-discriminatory police services. The PGPD has implemented two editions of the *Programa para la Identificación Policial Eficazi* (Program for the Effectiveness of the Police Stops, PIPE), which essentially replicates the STEPSS project described above. In the first edition, it was implemented in the local polices of Castellón and Pedrezuela (in 2013 and 2014)³¹, and in the second edition, which is currently being implemented, in the local polices of A Coruña and Puertollano.

c. Commitment of the National Police to introduce stop-forms

As mentioned above (Section 2.c), the Ombudsperson urged the National Police in 2013 to introduce a series of reforms in order to address ethnic profiling, similarly to what was recommended by the UN Special Rapporteur on Racism. One of these measures was the introduction of stop-forms to be completed by police officers every time they perform an ID check or search, in order to monitor the results in terms of effectiveness while detecting breaches to the law, and whether they disproportionately affect minorities. This measure has proven to be effective to reduce ethnic profiling while improving the performance of police officers. In June 2016, the Police General Directorate committed finally to implement this reform, pledging to start in the second semester of 2017 the development of the computer software that would allow the introduction of the data gathered in the stop-forms³². The Government should be encouraged to fulfill this commitment, which would represent an important step to address ethnic profiling practices as well as provide potential victims of arbitrary police practices with a complaint mechanism.

5. Conclusions and recommendations

Rights International Spain calls upon the European Commission against Racism and Intolerance to recommend the Spanish authorities to take the necessary actions and measures to address ethnic profiling, following its General Policy Recommendation 11 on combating racism and racial discrimination in policing. Specifically, Spain should be urged to:

1. Amend the Organic Law on Citizen Security *Ley Orgánica 4/2015, de 30 de marzo, de protección de la seguridad ciudadana*, in order to:
 - Include a specific prohibition of ethnic profiling, defining it as the “use by the police, with no objective and reasonable justification, of grounds such as

³⁰ See website at: <http://www.gestionpolicialdiversidad.org>

³¹ Open Society Justice Initiative and Plataforma por la Gestión Policial de la Diversidad, *Fair and Effective Police Stops. Lessons in Reform from Five Spanish Police Agencies*, 2016. Available at: <https://www.opensocietyfoundations.org/sites/default/files/fair-effective-police-stops-20160208.pdf>

³² See the letter addressed by the Ombudsperson informing a complainant of this commitment of the National Police Directorate, in the Annex to this report.

race, colour, language, religion, nationality or national or ethnic origin in control, surveillance or investigation activities”

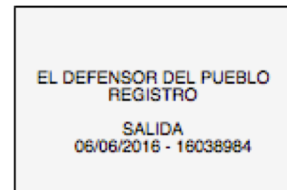
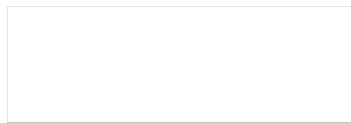
- Establish clear criteria for initiating and conducting stops, identity checks, and searches based upon a reasonable individualized suspicion that the subject in question has committed a crime or an administrative offence.
2. Introduce “stop forms” to record all stops and searches and identity checks, along with the implementation of a monitoring system allowing police officers and managers to detect and address any patterns of disproportionality and a community engagement. The National Police should be encouraged to fulfill its commitment to implement this tool in the second semester of this year.
 3. Set up an independent mechanism for the examination of complaints against law enforcement officials.
 4. Ensure that police officers receive training on human rights and in particular on non- discrimination and the prohibition of ethnic profiling. Training for police officers should be practical and emphasize building skills needed for human rights-compliant policing such as; the use of data and intelligence-led policing; valid grounds for individualized reasonable suspicion; and community consultation.
 5. Take measures to improve police-community relations and build trust, including by reaching out to representative ethnic and religious minority communities across Spain through public forums and discussion to enhance mutual understanding and trust; develop community policing initiatives; and create specialized ethnic and religious outreach units in the police.
 6. Ensure the recruitment of police officers with migrant and/or ethnic minority backgrounds with a view to establishing a police force that is representative of the community.
 7. Ensure that counter-terrorism measures, including preventing radicalization and violent extremism, comply with human rights and clear legal protocols. The Government should also be urged to provide information on the “stop-radicalismos” campaign and to adopt all the necessary safeguards to prevent communities from being stigmatized and discriminated as well as prevent false allegations.

Annex: Letter of the Spanish Ombudsman informing about the commitment of the National Police to implement stop-forms



MIT-ERP-TGA

Nº Expediente: 12246699



Estimada Sra.:

Se ha recibido la respuesta de la Dirección General de la Policía en la que se da cuenta de las medidas necesarias para atender las Recomendaciones formuladas, relativas a la creación de ficheros de datos de identificaciones y la instauración de los formularios de identificación. En concreto, se informa de que se iniciará en el segundo semestre de 2017 el desarrollo de la nueva aplicación informática para la realización del proyecto de elaboración de los formularios de identificación de personas. Se comunica que la implementación del proyecto requiere además la contratación de personal externo.

Se ha señalado a la Dirección General de la Policía que la puesta en marcha del proyecto implica el desarrollo del conjunto de Recomendaciones realizadas el 17 de abril de 2013 y reiteradas el 11 de abril de 2014. Con esta fecha, se continúa la actuación con la mencionada Dirección General. Tan pronto se reciba información complementaria al respecto, se le dará traslado de la misma.

Le saluda muy atentamente,

Francisco Fernández Marugán
Adjunto Primero del Defensor del Pueblo

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