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Tax Fairness and the Tax Mix

David G. Duff
Allard School of Law at the University of British Columbia, duff@allard.ubc.ca

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The Social Contract Revisited

Tax Fairness and the Tax Mix

David G. Duff

The Foundation for Law, Justice and Society

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Executive Summary

- Since a society's tax system is one of the most basic and essential social institutions, the justice or fairness of this system is an important subject for social and political theory, as well as for practical politics.

- While the most obvious purpose of most taxes is to raise revenue to finance public expenditures, taxes are also employed to regulate social and economic behaviour and to shape the distribution of economic resources. For this reason, the concept of tax fairness is necessarily pluralistic, depending on the particular purpose for which the tax is imposed.

- The benefit principle is a fair and legitimate way to finance various kinds of publicly provided goods and services, provided that it is feasible to identify and measure specific private benefits that the good or service confers; that access to a merit good or service is not impeded by the collection of a benefit-related charge or tax; and that distributive concerns are adequately addressed through other measures.

- The ability-to-pay approach has considerable appeal as a principle for allocating the costs of government expenditures on goods and services the benefits from which are indeterminate and generally shared, provided that distributive considerations are addressed through other measures.

- Where taxes are designed to regulate social and economic behaviour, principles of tax fairness assume a different character than they do for revenue collection, having regard to the justice of the regulatory goal, the presence of a rational relationship between the tax or tax incentive and the regulatory goal, and the distributional effects produced by the tax or incentive.

- Where a tax is designed to affect the distribution of economic resources, principles of tax fairness dissolve into broader considerations of distributive justice which determine the manner in which economic resources are fairly distributed and the respective roles of taxes and transfer payments to achieve this distributive goal. Although conceptions of distributive justice differ significantly, widely shared and normatively defensible principles of distributive justice support progressive taxes on income and wealth transfers in order to moderate inequalities that would otherwise prevail in the distribution of income and wealth, as well as the opportunities that result from substantial inheritances.

Tax Fairness and the Tax Mix

Introduction

Justice, John Rawls famously wrote, is the first virtue of social institutions.[1] Since a society's tax system is one of its most basic and essential social institutions, the justice or fairness of this tax system is an important subject for social and political theory, as well as for practical politics. In order to assess the fairness of any particular tax or the tax system as a whole, however, it is essential to consider the purpose of the tax and the tax system in general.

Although the most obvious purpose of most taxes is to raise revenue to finance public expenditures, this is not the only rationale for taxation, which may also be employed to regulate social and economic behaviour and to shape the distribution of economic resources.[2] For this reason, the concept of tax fairness is necessarily pluralistic, depending on the particular purpose for which the tax is imposed. Not surprisingly, therefore, modern welfare states typically levy a mix of taxes, including personal and corporate income taxes, broad-based consumption taxes, excise taxes on specific goods or services, payroll taxes, property or wealth taxes, wealth transfer taxes, as well as user fees and benefit taxes.

This brief considers the concept of tax justice or fairness in relation to each of these broad goals: the collection of revenues to finance public expenditures, the regulation of social and economic behaviour, and the distribution of economic resources. With respect to the collection of revenue for public expenditures, it argues that traditional principles of taxation according to benefits received and ability to pay provide useful criteria to assess the justice or fairness of taxes for this purpose. Regarding the regulation of social and economic behaviour, principles of tax fairness necessarily assume a different character, related to the justice of the regulatory goal, the presence of a rational relationship between the tax or tax incentive and the regulatory goal, and the distributional effects produced by the tax or incentive. Finally, it contends, where a tax is designed to affect the distribution of economic resources, principles of tax fairness dissolve into broader considerations of distributive justice which determine the manner in which economic resources are fairly distributed and the respective roles of taxes and transfer payments to achieve this distributive goal. Together, the brief concludes, these principles support a mix of taxes, including benefit taxes and user fees, a broad-based consumption tax like a value-added tax (VAT), excise taxes on specific goods and services, as well as progressive income and wealth transfer taxes.

Revenue collection

Notwithstanding their reliance on private markets to supply most goods and services, the public sectors of most modern welfare states account for a substantial percentage of gross domestic product (GDP), representing 36.5 per cent of GDP in the United Kingdom and 36.2 per cent of GDP in Organisation for Economic Co-operation and Development (OECD) countries in 2005. While some of these expenditures represent redistributive expenditures and transfer payments that are properly considered as part of a broader discussion of distributive justice, much of this revenue is devoted to publicly provided goods and services such as public security, transportation, education, public pensions, employment insurance, and health insurance. Theories of public finance generally explain the provision of these goods and services on the grounds that they satisfy social wants that cannot be supplied efficiently by the private sector or constitute so-called 'merit goods' that are so essential to human welfare and flourishing that they should be provided through the public sector, at least up to a basic

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1. Rawls, J. (1971) *A Theory of Justice*. Cambridge, MA: Harvard University Press, p. 1.
2. See, e.g., Avi-Yonah, R. (2006) 'The Three Goals of Taxation', *Tax Law Review*, 60: 1–28.

minimum. While the former include so-called 'pure' public goods and services like public security and national defence, the latter include quasi-private goods and services like public education, public pensions, and health insurance.

Assuming that public provision of these goods and services is justified on some account, the key question for a theory of tax fairness is how the revenues to finance these expenditures should be obtained. For this purpose, traditional approaches to tax policy have generally supplied two answers, suggesting that the costs of publicly provided goods and services should be allocated either according to the benefits that individuals and enterprises derive from government or according to some comprehensive measure of their taxable capacity or ability to pay.[3] While the benefit approach reflects a conception of tax fairness as transactional equivalence, according to which one should pay only for the goods and services that one receives in exchange, the ability-to-pay approach reflects a conception of tax fairness as equality of sacrifice, according to which the burden of financing public expenditures should apply so that whatever 'sacrifices' the government requires of taxpayers 'should be made to bear as nearly as possible with the same pressure upon all'.[4]

Benefit approach

Since the benefit principle requires individuals and enterprises to pay only for those publicly provided goods and services that they themselves enjoy, without paying for goods and services that governments provide to others, it might seem like an attractive principle to allocate the cost of government expenditures. Where benefit taxes are dedicated or earmarked to public expenditures on the goods and services in respect of which they are raised, moreover, this method of taxation also has the notable advantage of simultaneously determining both the level and structure of government spending and the manner in which it is financed.

In practice, however, the benefit approach suffers from three deficiencies as a general principle of tax fairness. First, the application of this principle presumes a just distribution of economic resources, the achievement of which is apt to demand the collection of other taxes for distributive purposes. Second, where the publicly provided good or service satisfies a merit good that is essential to human welfare and flourishing (such as education and health care), benefit taxation may impede access to the good or service, contradicting the very rationale for public provision. Finally, it is impossible to apply the benefit principle to pure public goods and services (like public security and national defence) the benefits from which are generally shared, without resorting to arbitrary presumptions regarding the manner in which these benefits are distributed.

Despite these limitations, however, the benefit principle can be a fair and legitimate way to finance various kinds of publicly provided goods and services, provided that it is feasible to identify and measure specific private benefits that the good or service confers; that access to a merit good or service is not impeded by the collection of a benefit-related charge or tax; and that distributive concerns are adequately addressed through other measures. Common examples include publicly provided pensions as well as employment and health insurance (which are generally financed in large part through benefit-related payroll taxes), publicly provided higher education (which is often partly financed through tuition fees), and public transportation including access to highways and roads (which is typically financed in part through user charges like transit fees and toll charges or benefit-related taxes like gasoline taxes). Although concerns about access and distribution mean that these goods and services are often subsidized from general government revenues, the substantial private benefits associated with these goods and services suggest that it is fair and reasonable to finance at least some portion of these

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3. See, e.g., Musgrave, R. A. (1959) *The Theory of Public Finance: A Study in Public Economy*. New York: McGraw-Hill Book Company, Inc., pp. 61–115.

4. Mill, J. S. (1970) *Principles of Political Economy*. London: Penguin Books, p. 155 [Book V, Chapter. II, Section. 2].

expenditures from taxes and user fees premised on the benefit principle. Indeed, considerations of economic efficiency, government accountability, and tax fairness suggest that modern welfare states might make greater use of benefit-related taxes to finance public expenditures in several areas such as higher education, roads and highways, and municipal services such as water and sewage and the collection and disposal of solid waste.

Ability-to-pay approach

As an alternative to the benefit principle of tax fairness, it is often argued that fair taxes should be apportioned according to a comprehensive measure of each individual's taxable capacity or ability to pay. Although this ability-to-pay principle is sometimes rationalized as a surrogate for taxation according to benefits received, the most prominent conceptions of this approach ignore any connection to public expenditures altogether, treating the collection of taxes as 'a common disaster – as though the money once collected were thrown into the sea.'[5]

The rationale for this approach to tax fairness is best expressed by John Stuart Mill, who rejected the benefit principle as a general principle of tax fairness on the grounds that government was 'so preeminently a concern of all' that it was pointless to determine who are 'most interested in it' and argued instead that governments should 'make no distinction of persons or classes in the strengths of their claims upon it' as a consequence of which 'whatever sacrifice it requires from them should be made to bear as nearly as possible with the same pressure upon all.'[6]

The ability-to-pay approach has considerable appeal as a principle for allocating the costs of government expenditures on goods and services, the benefits from which are indeterminate and generally shared, reflecting a principle of political equality that is the foundation of a democratic society. As with the benefit principle, however, this principle of tax fairness presumes a just distribution of economic resources, which may require the collection of other taxes.

And yet, the concept of ability-to-pay is notoriously imprecise. First, it is not obvious whether the measure of welfare for this purpose should be assessed at a particular point of time or over a period of time, nor the appropriate time period (e.g., annual or lifetime) should the latter approach be preferred. Second, it is not clear if the concept of equal sacrifice should be understood in terms of subjective utility or welfare, or rather according to a more objective measure of each taxpayer's economic capacity. Since it is impossible to measure subjective utility directly, the concept of ability-to-pay must be defined in some objective manner if it is to serve as a practical basis for distributing tax burdens. In practice, moreover, the meaning of ability to pay has been defined in different ways, reflecting different interpretations regarding the appropriate tax base and structure of tax rates that best implement this principle of tax fairness. In traditional approaches to tax policy, the definition of a fair tax base is described as a matter of 'horizontal equity', while the specification of tax rates is characterized as a question of 'vertical equity'.

Beginning with the subject of horizontal equity, it is often assumed that a person's annual income represents the best measure of their ability to pay. However, another tradition in tax scholarship regards annual consumption or expenditure as a fairer measure of each individual's taxable capacity on the basis that the taxation of annual consumption does not differentiate among taxpayers according to the period of time when income is earned and consumed. Indeed, Mill himself regarded consumption as a better measure of ability to pay than income on the grounds that a labourer who must save for contingencies and old age does not have the same ability to pay as a property owner with the same annual income who can maintain the

5. Blum, W. J. and Kalven, H. Jr. (1952) 'The Uneasy Case for Progressive Taxation', *University of Chicago Literary Review*, 19: 417–519 at 517.

6. Mill, *supra* note 4, p. 155 [Book V, Chapter II, Section 2].

same level of consumption over time without having to save for these purposes. For this reason, others have suggested that wealth should also be taken into account in assessing a person's ability to pay.[7]

Nor have attempts to define the concept of ability-to-pay yielded any consensus on the preferred structure of tax rates to give effect to the principle of vertical equity. Although the concept of 'equal sacrifice' might suggest that any tax should be levied at a single or proportionate rate, the idea of diminishing marginal utility is often assumed to justify progressive tax rates on the grounds that a larger tax must be imposed at higher levels of income, consumption, or wealth in order to maintain the same sacrifice in terms of utility or welfare. If equality of sacrifice requires each taxpayer to experience the same loss of total utility (equal absolute sacrifice), however, progressive rates are called for only if the marginal utility of the unit that is subject to tax decreases more rapidly than the increase in the quantity of the unit. Where the percentage reduction in the utility of the unit subject to tax is less than the percentage increase in the quantity of the unit, on the other hand, equal absolute sacrifice calls for rates to decrease as the quantity of the unit increases. If equality of sacrifice is understood proportionately, however, so that taxpayers are required to surrender an equal share of the utility derived from their income, consumption, or wealth (equal proportionate sacrifice), progressive rates are generally required.

Non-welfarist conceptions of equal sacrifice might also justify progressive rates on the grounds that taxable capacity however defined increases more rapidly than increases in the base that is subject to tax. A version of this non-welfarist approach may underlie a broad consensus that the ability-to-pay principle mandates the exemption of a basic amount of income or consumption necessary for basic needs, though Mill also favoured a basic exemption on the welfarist ground that the sacrifice imposed by taxes which apply to expenditures on necessities is 'incommensurably' higher than that imposed by taxes above a subsistence amount.

Aside from these arguments for and against progressive rates, progressivity is often justified in this context on the basis that 'prevailing social conceptions of equity' mandate this approach in order to reduce inequality.[8] Although broader conceptions of distributive justice may indeed justify progressive rates, this justification should not be confused with whatever justification for progressivity may exist in order to properly implement a narrower principle of taxation according to ability to pay. Indeed, it is an unfortunate feature of many appeals to the concept of ability-to-pay that they fail to clearly distinguish between a concept of tax fairness to govern the collection of revenues for publicly provided goods and services, and a concept of tax fairness that is designed to advance a broader conception of distributive justice.

Shorn of any association with a broader conception of distributive justice, one might hope that the concept of ability-to-pay could be defined with some precision in order to give effect to its purpose as a principle of tax fairness to distribute the cost of public expenditures in an equal manner. Some progress in this direction might also be made by abandoning utilitarian conceptions of the principle in favour of an explicitly objective definition that is more compatible with non-welfarist conceptions of justice and equality in a liberal society. On this basis, for example, one might reject the taxation of personal wealth on the grounds that it fails to respect prior choices to save rather than to spend. One might also reasonably conclude that equal taxation for this purpose mandates a proportionate or single rate above a basic exemption, rather than progressive rates.

7. Kaldor, N. (1955) *An Expenditure Tax.* London: George Allen & Unwin Ltd., p. 33.

8. Ibid., p. 27.

As between income and consumption, the choice of an ideal tax base for the purpose of collecting revenues for publicly provided goods and services is more difficult, though Mill's argument that the labourer who must save for contingencies and old age does not have the same ability to pay as the property owner who can maintain the same level of consumption without having to save provides a compelling argument for consumption taxation.

In conclusion, therefore, these considerations suggest that a proportionate consumption tax above a basic exemption might be the most appropriate way to implement a scheme of fair taxation for the collection of revenues to finance publicly provided goods and services that cannot reasonably be financed according to the benefit principle of tax fairness. In practice, such a tax could be implemented in the form of a personal expenditure tax under which revenues are included and savings deducted, but is more easily collected through a broad-based VAT combined with a universal or targeted transfer payment designed to offset the tax on a minimum amount of tax. Perhaps not surprisingly, therefore, broad-based VATs and universal or targeted transfer payments are commonly found in most developed countries, with the notable exception of the United States.

Regulation

A second and entirely distinct purpose of taxation is as a regulatory tool. Governments often pursue regulatory objectives through tax incentives or tax expenditures that encourage certain kinds of behaviour by reducing taxes otherwise payable. Conversely, governments can also impose regulatory taxes in order to discourage unwelcome behaviour by increasing its price. While these regulatory taxes almost inevitably raise some revenue, this is incidental to their basic purpose to regulate social and economic behaviour.

There is a considerable literature on tax expenditures, much of it critical of the complexity and absence of accountability that can result from the delivery of these fiscal subsidies through the tax system. Provided that these tax expenditures are properly identified and accounted for, however, there is no reason why they should be any more or less desirable than direct spending programmes. As a result, provided that the tax incentive is rationally related to the regulatory goal that it is supposed to advance, one might expect that the fairness of any particular tax expenditure should depend solely on the justice of the regulatory goal that it is designed to promote. Since tax expenditures can have different distributive effects, however, a concept of tax fairness in this context should also consider the manner in which the resulting tax benefit is distributed. To the extent that deductions and exemptions in a progressive income tax with a basic exemption are worth more to high-income taxpayers than low-income taxpayers and worth nothing to taxpayers whose incomes are too low to pay any tax, tax expenditures that are provided in these forms are rightly criticized as inequitable. The same criticism may also be directed at non-refundable tax credits, which are also worthless to taxpayers whose incomes are too low to pay any tax.

Turning from tax expenditures to regulatory taxes, questions of tax fairness also depend on the justice of the regulatory goal, the existence of a rational relationship between the tax and the regulatory goal, and the distributional effects of the tax. Whilst it is not possible within the scope of this brief to examine the merits of different kinds of regulatory taxes, a compelling argument for regulatory taxation is to compel private actors to incorporate otherwise undervalued costs of their activities, such as environmental harms, into their economic decisions by setting a tax price on the harm. While environmental taxes along these lines are typically defended on grounds of economic efficiency, they also reflect a principle of commutative or corrective justice according to which those who are responsible for environmental harms should take responsibility for the damage that they cause. Where the amount of the tax corresponds to the amount of the environmental harm, therefore, an environmental tax would seem to represent a fair and efficienct form of regulatory taxation.

Distribution

A third important purpose of taxation is to shape the distribution of economic resources in a society so as to promote a particular conception of economic or distributive justice. To the extent that this conception of justice mandates the collection of revenues to finance redistributive programmes or transfers, the principles of tax fairness that are appropriate for this purpose may differ from those governing the collection of revenues to finance other public expenditures. Taxes may also shape the distribution of economic resources directly, through progressive rates for example, in which case the applicable principles of tax fairness depend wholly on the underlying conception of distributive justice that the tax is designed to advance.

Although traditional tax policy analysis has tended to avoid these broader issues of distributive justice, addressing only narrower questions of tax equity in the collection of revenues for government expenditures, the broader subject of distributive justice is the proverbial 'elephant in the room', without any discussion of which other principles of tax fairness necessarily remain incomplete. The problem for a comprehensive theory of tax fairness, however, is that different conceptions of distributive justice have widely different implications for the kinds of taxes and expenditures that may or may not be appropriate for distributive purposes.

Beginning with welfarist approaches, in which distributive justice is understood as the maximization of social welfare in accordance with a stipulated 'social welfare function' (SWF), the purpose of all redistributive taxes and government expenditures is to maximize social welfare by redistributing economic resources in a manner that least affects economic activities that would occur in the absence of the tax. On this basis, welfarist approaches tend to favour proportionate or declining-rate income taxes combined with redistributive transfer payments, or the taxation of personal consumption at progressive rates.

In contrast to welfarist conceptions of distributive justice, libertarian conceptions typically reject all redistributive taxes and transfers on the grounds that 'patterned' or 'end-result' conceptions of distributive justice violate people's rights to the ownership of property that is justly acquired and justly transferred.[9] As a result, except to the extent that taxes are justified to correct for past injustices in the acquisition or transfer of property, libertarian conceptions of distributive justice generally limit the sphere of legitimate taxation to the collection of revenues that are necessary to support the most basic purposes of government such as the protection of persons and property.

A third approach to taxation and distributive justice can be characterized as liberal-egalitarian. Despite significant variations within this tradition, one can discern three broad principles that have implications for taxes and spending in a liberal-egalitarian society. First, such a society should secure a framework of equal basic liberties, and minimize extreme economic inequalities so that citizens can stand in relation to each other as social and political equals. Second, such a society should minimize the distributive consequences of unanticipated and undeserved fortune, both good and bad, and ensure a measure of equal opportunity so that similar distributive outcomes are reasonably accessible to all. Third, regardless of the cause of their misfortune, such a society should aim to elevate the position of the least well-off. Applied to the context of taxes and spending, these principles might reasonably favour progressive income and wealth transfer taxes in order to moderate economic inequalities and opportunities and minimize the distributive consequences of undeserved good fortune, as well as social insurance programmes to compensate people for unanticipated and undeserved misfortune and transfer payments and other programmes to improve the economic position of the least well-off.

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9. Nozick, R. (1974) *Anarchy, State, and Utopia*. New York: Basic Books, pp. 149–231.

Although it is impossible in the context of this brief to address each of these conceptions of distributive justice in detail, nor the full implications of each conception for taxation and spending, two lines of argument suggest that the liberal-egalitarian approach as outlined should be preferred to the welfarist and libertarian conceptions. First, as a theoretical matter, neither welfarism nor libertarianism constitutes a persuasive theory of justice, since the former (as Rawls famously explained) 'does not take seriously the distinction between persons'[10] while the latter is arguably incompatible with the conception of free and equal persons on which it is based.[11] In practice, moreover, the tax and spending policies recommended by the liberal-egalitarian approach are broadly consistent with those actually found in modern liberal-democratic welfare states, suggesting that this conception of distributive justice is generally shared in these societies. As a result, it follows, widely shared and normatively defensible principles of distributive justice support progressive taxes on income and wealth transfers in order to moderate inequalities that would otherwise prevail in the distribution of income and wealth as well as the opportunities that result from substantial inheritances.

Conclusion

Since taxes have different purposes, the concept of tax fairness is inescapably plural, assuming different forms according to the purpose of the tax that is subject to investigation. This brief has considered three purposes for taxation – to collect revenues to finance publicly provided goods and services, to regulate social and economic behaviour, and to shape the distribution of economic resources – and examined principles of tax fairness applicable to each. Where taxes are collected in order to finance government expenditures on goods and services, the traditional benefit and ability-to-pay approaches provide useful principles of tax fairness. Where taxes serve a regulatory purpose, the fairness of the tax or tax incentive depends on the fairness of the regulatory objective, the relationship between the tax measure and the regulatory goal, and the distributional implications of the tax or incentive. The use of taxes for distributive purposes depends on the underlying concept of distributive justice, as a consequence of which the concept of tax fairness dissolves into broader questions of distributive justice.

Within this pluralistic normative framework, this brief has also reached specific conclusions with respect to the kinds of taxes that might reasonably exist for each of these purposes, favouring the use of benefit taxes and user fees for specific purposes, a broad-based VAT to collect revenues for more general government expenditures, regulatory environmental taxes, as well as progressive income and wealth transfer taxes. Although all of these taxes are not found in all modern welfare states, and the extent to which different countries rely on different taxes differs, most of these taxes are found in most modern welfare states, suggesting that our tax practices are broadly compatible with principles of tax justice or fairness.

10. Rawls, *supra* note 1 at 27.

11. See Duff, D. G. (2005) 'Private Property and Tax Policy in a Libertarian World: A Critical Review', *Canadian Journal of Law and Jurisprudence*, 18: 40–3.

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David Duff is an Associate Professor at University of Toronto Faculty of Law, and currently visiting at the Faculty of Law at the University of British Columbia. He has an LLM from Harvard and an LLB from the University of Toronto, master's degrees in political theory from the University of Toronto and economics from York University, and a BA (Honours) from Queen's University. Prior to joining the Faculty in 1996, Professor Duff was a tax associate at the Toronto office of Stikeman, Elliott. He was also employed as a researcher with the Ontario Fair Tax Commission from 1991–1993 and as a tax policy analyst with the Ontario Ministry of Finance in 1993–1994. Professor Duff is the author of a textbook/casebook on Canadian income tax law, and co-editor of books on tax avoidance in Canada and Canadian climate change policy, and has published numerous articles on tax law and policy.

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or contact us at:

The Foundation for Law, Justice and Society

Wolfson College
Linton Road
Oxford OX2 6UD
T · +44 (0)1865 284433
F · +44 (0)1865 284434
E · info@fljs.org
W · www.fljs.org