

# Advanced Family Law

## Child and Spousal Support Issues

### I. Types of support:

There are six types of spousal support that may be awarded by the Family Court: (1) permanent periodic alimony; (2) lump sum alimony; (3) rehabilitative alimony; (4) reimbursement alimony; (5) separate maintenance and support; and (6) such other form of spousal support as the Court may consider just and appropriate. The Family Court has the authority to award both temporary and permanent support.

1. “*Permanent Periodic Alimony*” is the most commonly awarded form of alimony in South Carolina, intended to restore the dependent spouse to the standard of living enjoyed during the marriage. Permanent periodic alimony usually terminates on the remarriage or cohabitation of the supported spouse or upon the death of either spouse. Permanent periodic alimony can be terminated or modified by the Family Court if there is a *substantial change in circumstances that occurs in the future*.
2. “*Lump Sum Alimony*” is a finite total sum to be paid in one installment or periodically over a period of time. Lump sum alimony is usually awarded only in exceptional circumstances and for compelling reasons, such as where it appears that the payor may not live up to regular alimony obligations. When awarded, lump sum alimony is non-modifiable and terminates only upon the death of the supported spouse. It does not terminate upon remarriage or cohabitation of the supported spouse.
3. “*Rehabilitative Alimony*” provides support for the dependent spouse to allow for additional training or education to help the supported spouse achieve his or her income potential and to enable the supported spouse to become self-supporting. When rehabilitative alimony is awarded, it is terminable upon the remarriage or cohabitation of the supported spouse, the death of either spouse, or the occurrence of a specific event to occur in the future. Rehabilitative alimony is also modifiable based upon unforeseen events frustrating the good faith efforts of the supported spouse to become self-supporting or the ability of the supporting spouse to pay the rehabilitative alimony. Rehabilitative alimony terminates on the remarriage or cohabitation of the supported spouse, or upon the death of either spouse, but it is not terminable or modifiable based upon a change in circumstances in the future.
4. “*Reimbursement Alimony*” S.C. Code Ann. § 20-3-130(B)(4) (Supp. 1993). The purpose of this form of support may include, but not be limited to, circumstances where the court finds it necessary and desirable to reimburse the supported spouse from the future earnings of the payor spouse based upon circumstances or events that occurred during the marriage.”
5. “*Separate Maintenance and Support*” is simply what spousal support is called when it is awarded in a separate maintenance action rather than a divorce action
  - a. An order of separate maintenance and support: can provide for one spouse to make support payments to the other, determine child custody and visitation rights, decide

who gets to live in the family home, and divide the couple's property. But an order of separate maintenance and support is not a divorce – the parties are still married. If one of them dies, the inheritance laws that apply to married couples will still apply.

- b. A maintenance and support order can help couples protect themselves financially and resolve child custody and visitation issues during the separation period.
  - c. A couple doesn't have to divorce after receiving an order of separate maintenance and support. The husband and wife may simply choose to remain separated. This is an attractive option for couples that don't want to divorce for religious reasons. Couples may also choose separation without divorce to receive social security and military benefits, tax benefits, and coverage under one spouse's health insurance.
  - d. An order of separate maintenance and support ends if the parties divorce, if the party receiving support lives with someone else in a romantic relationship for a period of 90 consecutive days, or if one of the parties dies. It can also be terminated or modified based upon changed circumstances.
6. "Other forms of spousal support" may be awarded by the Family Court. By definition this includes provisions for housing, transportation, etc.

**The type and amount of spousal support to be awarded by the Family Court are largely in the total discretion of the Family Court and is very fact intensive. However, the law requires that the Family Court consider the following factors when making those determinations:**

- (1) The duration of the marriage together with the ages of the parties at the time of the marriage and at the time of the divorce or separate maintenance action between the parties;
- (2) The physical and emotional conditions of each spouse;
- (3) The educational background of each spouse, together with the need of each spouse for additional training or education in order to achieve that spouse's income potential;
- (4) The employment history and earning potential of each spouse;
- (5) The standard of living established during the marriage;
- (6) The current and reasonably anticipated earnings of both spouses;
- (7) The current and reasonably anticipated expenses and needs of both spouses;
- (8) The marital and non-marital properties of the parties, including those apportioned to him or her in the divorce or separate maintenance action;

- (9) Custody of the children, particularly where conditions or circumstances rendered appropriate that the custodian not be required to seek employment outside the home, or where employment must be of a limited nature;
- (10) Marital misconduct or fault of either or both parties (with exceptions);
- (11) The tax consequences to each party as a result of the particular form of support awarded;
- (12) The existence and extent of any support obligation from a prior marriage or any other reason by either party; and
- (13) Such other factors the Court considers relevant.

## **II. Arguing Spousal Maintenance: What Works What Doesn't**

### *What Works!*

#### *A. Pendente Lite Alimony*-primary reason for awarding is for support!

Can be awarded based on the financial position of each spouse.

Use financial declaration, bring bills due, and/or in arrears.

Can use the marital home as alimony on a temporary basis

Court must allocate between spousal and child support.

Caution: Repayment may be required if permanent alimony is not awarded.

#### *B. Permanent Alimony*

An award of alimony rests within the sound discretion of the family court and will not be disturbed absent an abuse of discretion. Alimony is a substitute for the support that is normally incident to the marital relationship. Generally, alimony should place the supported spouse, as nearly as is practical, in the same position he or she enjoyed during the marriage. It is the duty of the family court to make an alimony award that is fit, equitable, and just if the claim is well founded. Alimony should not dissuade a spouse, to the extent possible, from becoming self-supporting

#### *Four Key Questions:*

- 1. Does either spouse NEED alimony*
- 2. Why is it needed?*
- 3. Can the Payor spouse afford to pay alimony without undue hardship?*
- 4. Is this a fault-based divorce?*

*If a judge awards alimony...how much? Dependent on the 11 factors mentioned above.*

### *C. Lump Sum Alimony*

The family court should consider the following factors in determining whether to award lump sum alimony:

(1) the financial condition or status of the appellant; (2) the needs of the respondent; (3) the health and ages of both parties; (4) each party's earning capacity; (5) the actual income of each party; (6) the individual contributions to the accumulation of their joint wealth; (7) the standard of living by both parties at the time of the divorce; (8) the duration of the marriage; (9) the conduct of the parties; and (10) the special circumstances making any award of lump sum alimony advisable. Atkinson v. Atkinson, 279 S.C. 454, 456-57, 309 S.E.2d 14, 15 (Ct. App. 1983).

Typically, the primary justification for lump sum alimony is the unreliability of the supporting spouse to make regular payments. See Jones v. Jones, 270 S.C. 280, 241 S.E.2d 904 (1978) (upholding the award of \$36,000 in lump sum alimony when husband drank excessively, was not regularly employed, had failed to pay child support for the last five years, threatened to leave the country to avoid payments, and had just inherited property valued near \$100,000); Murdock v. Murdock, 243 S.C. 218, 133 S.E.2d 323 (1963) (affirming lump sum alimony of \$4250 when the husband moved to a distant state, remarried, and had been found in contempt of court for failing to pay pendente lite alimony); Hendricks v. Hendricks, 285 S.C. 591, 330 S.E.2d 553 (Ct. App. 1985) (affirming lump sum alimony of \$30,000 when husband failed to support his family for nineteen years, quickly spent a \$45,000 inheritance by purchasing a truck and paying the hospital bills of a paramour in another state); see also Roy T. Stuckey, Marital Litigation in South Carolina 217 (3d ed. 2001).

Note: It depends on the party you are representing as to whether you advise taking a lump sum. For instance, if you represent the spouse being awarded alimony and there is a high probability he/she will remarry, then a lump sum would be more beneficial.

### *D. Rehabilitative Alimony*

The purpose of rehabilitative alimony may include, but is not limited to, circumstances when the family court finds providing for the rehabilitation of the supported spouse appropriate. Rehabilitative alimony provides modifiable ending dates coinciding with events considered appropriate by the family court such as the completion of job training or education and the like and requires rehabilitative efforts by the supported spouse. Id.; see also Eagerton v. Eagerton, 285 S.C. 279, 282, 328 S.E.2d 912, 914 (Ct. App. 1985) ("The purpose of rehabilitative alimony is to encourage a dependent spouse to become self-supporting by providing alimony for a limited period of time during which the dependent spouse might retrain and rehabilitate himself or herself thereby limiting the duration of the time in which the supporting spouse is burdened by spousal support."). Moreover, rehabilitative alimony permits a couple to develop their own lives free from obligations to each other. Id. at 282, 328 S.E.2d at 914-15.

The factors to be considered in awarding rehabilitative alimony include:

(1) the duration of the marriage; (2) the age, health, and education of the supported spouse; (3) the financial resources of the parties; (4) the parties' accustomed standard of living; (5) the ability of the supporting spouse to meet his needs while meeting those of the supported spouse; (6) the time necessary for the supported spouse to acquire job training or skills; (7) the likelihood that the supported spouse will successfully complete retraining; and (8) the supported spouse's likelihood of success in the job market.

In order for the family court to grant rehabilitative alimony, the evidence must demonstrate the supported spouse will be self-sufficient at the expiration of the ordered payments. Toler v. Toler, 292 S.C. 374, 378, 356 S.E.2d 429, 431 (Ct. App. 1987).

***Ricigliano: First published SC opinion granting a husband permanent periodic alimony. If the rehabilitative alimony was held up in this case it would have been the first case affirming an award of rehabilitative alimony in twenty-seven years.***

In this case Wife first denied the adultery to Husband. Then she invoked her 5th amendment privilege against self-incrimination when asked about it in discovery. She admitted to four adulterous affairs, *Ricigliano v. Ricigliano*, 413 S.C. 319775 S.E.2d 701 (Ct. App. 2015)

The combination of Wife's marital fault, the parties' disparate incomes, and Husband's sacrifice of his career to further Wife's career should have warranted permanent periodic alimony.

In 2005, Husband closed a successful business in New York State and relocated to South Carolina to advance Wife's career with United States Customs and Border Protection. At the time of trial, Wife earned \$87,278 a year and was contemplating a move to Washington, DC that would pay her approximately \$117,000 a year. Meanwhile, Husband struggled to reestablish his business in South Carolina and was earning about \$2,100 a month. After trial the family court allowed Wife to relocate with the parties' daughter to Washington, DC and awarded Husband \$500 per month in rehabilitative alimony *if he followed Wife to DC*. Husband appealed the alimony award along with three other issues.

The Court of Appeals held that this award of rehabilitative alimony was improper and remanded the matter back to the family court for an award of permanent alimony, holding:

The family court clearly erred in awarding Husband rehabilitative alimony. As noted, the law favors the award of permanent periodic alimony, and rehabilitative alimony may be awarded only in exceptional circumstances, when there has been a showing of special circumstances justifying a departure from the normal preference for permanent periodic support. Additionally, the family court failed to consider the appropriate factors in determining whether rehabilitative alimony was proper under the circumstances. Finally, there is no evidence demonstrating Husband will be self-sufficient at the expiration of the ordered payments.

Furthermore, the court held that the requirement that Husband relocate to DC to receive any alimony was in error. It was not economically feasible.

*E. Other types of support-medical bills, insurance, household bills, and so forth, may also include* requiring the posting of money, property, and bonds and may require a spouse, with due consideration of the cost of premiums, insurance plans carried by the parties during marriage, insurability of the payor spouse, the probable economic condition of the supported spouse upon the death of the payor spouse, and any other factors the court may deem relevant, to carry and maintain life insurance so as to assure support of a spouse beyond the death of the payor spouse. Also, may order one party to pay a reasonable amount to the other for attorney fees, expert fees, investigation fees, costs, and suit money incurred in maintaining an action for divorce from the bonds of matrimony,

#### *F. Reimbursement Alimony*

This type of alimony has been applied in South Carolina to the situation where one spouse takes the benefit of the support of the other spouse while obtaining a professional degree or license. *Donahue v. Donahue*, 299 S.C. 353, 384 S.E.2d 741 (1989).

- a. Investment in a business/degree/license
- b. Not always a financial investment. Other investments include:
- c. Time and energy in taking care of the household (including raising children)

Often reimbursement alimony becomes necessary when spouses separate before the supporting spouse has established a history of greater earnings than was anticipated and when that spouse established a business or completed his or her education.

#### *What Doesn't!*

- a. Adultery which has not been condoned is an absolute bar to alimony, unless it occurs after a Marital Settlement Agreement is reached or the Court enters a Decree of Separate Maintenance, whichever first occurs.
- b. No need for support
- c. Short-term marriage

Generally, must be married 10 years

#### II. Voluntary Impoverishment: Depends!!!

Whether termed voluntary underemployment, imputation of income, or the failure to reach earning potential, the case law is clear that when a payor spouse seeks to reduce support obligations based on his diminished income, a court should consider earning capacity. See, e.g., *Boney v. Boney*, 289 S.C. 596, 347 S.E.2d 890 (Ct. App. 1990); *Vestal v. Vestal*, 297 S.C. 215, 375 S.E.2d 355 (Ct. App. 1988). Further, the Supreme Court has emphasized that voluntary changes in employment which impact a payor spouse's ability to pay alimony are to be closely scrutinized. *Camp v. Camp*, 269 S.C. 173, 236 S.E.2d 814 (1977).

However, increased or decreased income, without more, is insufficient to warrant a change in circumstances, see, e.g., *Brown v. Brown*, 278 S.C. 43, 292 S.E.2d 297 (1982); *Baker v.*

Baker, 286 S.C. 200, 332 S.E.2d 550 (Ct. App. 1985); Calvert v. Calvert, 287 S.C. 130, 336 S.E.2d 884 (Ct. App. 1985), the failure to reach earning capacity, by itself, does not automatically equate to voluntary underemployment such that income must be imputed.

In Kelley v. Kelley, Th ex-husband worked as an accountant at the time of the divorce, but the ex-wife only worked part-time. However, the ex-husband left his job and attempted a real estate venture that failed. The ex-husband ended up with a lower paying job, and the ex-wife began working full-time.

The appellate court affirmed the ex-husband's reduced income justified the reduction. While the ex-husband was educated, and had business experience, under the difficult standard of review, the court could not find error on the voluntary underemployment issue. While earning capacity was a factor to consider, the failure to reach earning capacity by itself did not equate to voluntary underemployment. The family court judged the credibility of the ex-husband, and its finding that he acted in good faith in his career choices was entitled to deference. Any misrepresentations on taxes were subject to the credibility determination by the family court. Kelley v. Kelley, 324 S.C. 481, 477 S.E.2d 727, 1996 S.C. App. LEXIS 156 (S.C. Ct. App. 1996).

Justice Hearn dissented based on other cases:

In Boney, the husband sought a reduction or termination of alimony due to his termination from his former employment. The trial judge, however, as affirmed by this court, found the husband's potential earning ability should be based upon his capacity for prospective earnings rather than upon his actual earnings, and refused to grant a modification. Id. at 599, 347 S.E.2d at 892. Similarly, Mr. Kelley's voluntary underemployment should not be the basis for a reduction of alimony when his *capacity* for earning remains the same as it was in 1989. See Fisher v. Fisher 5 S.C. 462 S.E.2d 303, 307 (Ct. App. 1995) (imputing father's potential income for determination of child support obligation); Robinson v. Tyson, 319 S.C. 360, 461 S.E.2d 397, 399 (Ct. App. 1995) (holding father capable of higher earning potential for determination of child support obligation).

Moreover, with the emancipation of the parties' two children, the husband was relieved from his child support obligation of \$ 966 per month. This change in circumstances substantially improved the husband's financial condition. Given this fact and the voluntary nature of his own reduction in income, I believe the trial judge erred in granting the husband a reduction in alimony.

See, e.g., Brown v. Brown, 278 S.C. 43, 292 S.E.2d 297 (1982) Where Husband asserts that Wife's increased monthly income from \$ 406.26 to \$ 1516.67 (excluding alimony) is proof of changed circumstances. Wife testified that she did not work outside the home until both children started school. At the time of the divorce she had part-time employment, which she later turned into a full-time job. There is no evidence in the record that the parties expected Wife to continue working only at home. On the contrary, the record suggests that, at the time of the divorce, the parties anticipated that Wife would later return to work full-time outside the home. Accordingly, Husband cannot use Wife's increased earnings as a basis for changed circumstances.

### III. Support Modification:

A party is entitled to a modification based on a substantial change in circumstances if he or she can show an unanticipated substantial change in circumstances. The party seeking modification bears the burden to show by a preponderance of the evidence that the unforeseen change has occurred. This burden is always a high one, hence the requirement that the change in circumstances be "substantial."

In general, changes in circumstances within the contemplation of the parties at the time the decree was entered do not provide a basis for modifying either an alimony allowance or a child support award." Calvert v. Calvert, 287 S.C. 130, 139, 336 S.E.2d 884, 889 (Ct. App. 1985). However, in applying this general rule, the family court should look not only at whether the parties contemplated the change, but also "most importantly whether the amount of alimony in the original decree reflects the expectation of that future occurrence." Sharps, 342 S.C. at 78, 535 S.E.2d at 917. Moreover, as our supreme court noted, "There are some future changes which may be in contemplation of the parties at the time of the decree but, due to other considerations, cannot be addressed at that time in the divorce decree." 342 S.C. at 77, 336 S.E.2d at 916

- a. Loss of job/income without fault
- b. Loss of health
- c. Retirement by the supporting spouse is sufficient grounds to warrant a hearing, if so moved by a party, to evaluate whether there has been a change of circumstances for alimony, S.C. Code Ann. § 20-3-170

The court shall consider the following factors:

- (1) whether retirement was contemplated when alimony was awarded;
- (2) the age of the supporting spouse;
- (3) the health of the supporting spouse;
- (4) whether the retirement is mandatory or voluntary;
- (5) whether retirement would result in a decrease in the supporting spouse's income; and
- (6) any other factors the court sees fit.

- d. Inheritance?

See Gay v. Gay, 70 Conn. App. 772, 800 A.2d 1231, 1240 (Conn. App. Ct. 2002) (holding the appreciation in value of an asset "distributed at the time of the dissolution does not constitute a change in circumstances that the court may consider when deciding whether to entertain a motion for a modification. Also cannot be used as a factor to determine the amount by which alimony is to be modified. Eubank v. Eubank, 347 S.C. 367, 374, 555 S.E.2d 413, 417 (Ct. App. 2001) (noting, where Wife received property after the equitable distribution, the family court

erred by refusing to consider the property when determining whether an alimony modification was warranted because "even if Husband knew before the parties' divorce that Wife would likely receive an inheritance on the deaths of her mother and aunt, the parties could not have ascertained the amount of Wife's inheritances or when she would receive them." Thus, the property could not have been considered by the family court in the equitable distribution.").

e. Increased expenses?

The increase in child support and alimony payments was appropriate. The wife presented evidence of a dramatic increase in the children's expenses. The wife had severe medical problems that hampered her earning ability. The husband had the ability to pay the increased support. Thornton v. Thornton, 328 S.C. 96, 492 S.E.2d 86, 1997 S.C. LEXIS 195 (S.C. 1997).

The following circumstances, without more, have been found insufficient to warrant modification of alimony:

- a. unwarranted debts
- b. inflation
- c. increased or decreased income of the payor spouse...Husband was denied a downward modification of alimony because Wife began drawing Social Security. See Hailey v. Hailey, 357 S.C. 18, 590 S.E.2d 495, 2003 S.C. App. LEXIS 67 (S.C. Ct. App. 2003)
- d. a payee spouse's anticipated employment, and the "straitened financial situation[s]" which are a normal consequence of divorce.

See Brown v. Brown, 278 S.C. 43, 292 S.E.2d 297 (1982); Kielar v. Kielar, 311 S.C. 466, 429 S.E.2d 851 (Ct. App. 1993); Calvert v. Calvert, 287 S.C. 130, 336 S.E.2d 884 (Ct. App. 1985); Baker v. Baker, 286 S.C. 200, 332 S.E.2d 550 (Ct. App. 1985)

e. Inflated Expenses

See Myers v. Myers, Wife Inflated her expenses for more alimony that she was entitled. Her alimony was reduced. Her expenses included: \$2,300 per month on clothing, entertainment, trips, clubs, hair care, cosmetics, pet care, nails, tanning, and gifts. Myers v. Myers, 391 S.C. 308.

Unchanged circumstances!!!

In Butler v Butler, the Court deemed not a substantial change of circumstances:

- a. Interest in Mother's estate which was providing more income.
- b. Considered husband's ability to pay alimony, S.C. Code Ann. § 20-3-130(C) (Supp. 2008).
- c. Wife's reduction in expenses—in this case termination of her child support obligation and satisfaction of mortgage
- d. Not unanticipated!!!

- e. Terms of agreement states “Non-modifiable”

#### IV. Alimony Support Terminations: When and How

- a. Remarriage
- b. Living with paramour 90 consecutive days- S.C. Code Ann. § 20-3-130(B)(1) (Supp. 2012) provides that periodic alimony terminates upon the continued cohabitation of the supported spouse and is terminable and modifiable based upon changed circumstances occurring in the future.
- c. Inheritance?
- d. Annulment???

See Jove v Yon, husband argued that his alimony obligation terminated when the wife remarried and that it was not reinstated when the wife had the remarriage annulled. The State's highest court held that the case by case approach was the most appropriate method for resolving whether a subsequent annulment reinstated an alimony obligation of the previous spouse. The case was remanded to the family court so that the record could be reopened to include evidence to assist the court in employing the Cargill analysis. Even if the family court reinstated periodic alimony payments, the husband had no obligation to pay retroactive alimony to the wife for the time period that she was married to her bigamous husband. Joye v. Yon, 355 S.C. 452, 586 S.E.2d 131, 2003 S.C. LEXIS 206 (S.C. 2003)

The court used the Cargill factors which includes:

- a. length of the subsequent marriage,
- b. whether the payee spouse received support and maintenance from the annulled marriage,
- c. whether the payor spouse was prejudiced by the revival of alimony payments,
- d. whether the subsequent marriage was properly annulled,
- e. and any change in the spouses' personal and financial circumstances after the subsequent marriage was annulled.

#### V. Child support modification:

- a. Loss of job/income
- b. Loss of health
- c. Social Security
- d. No more daycare/after school expenses

#### VI. Child support termination

South Carolina Code Section 63-3-530(A)(17) states that child support terminates when a child turns 18 or graduates from high school whichever comes first.

Generally, a child is emancipated when he or she reaches eighteen or graduates high school, whichever happens last. A child can also be considered emancipated when he or she is married, unless the child is disabled or some other special circumstance exists. In those cases, the duty to provide child support may continue until the disability or special circumstance ends.

If you are paying child support directly to the supporting parent's child, and you only have one child or your youngest child is emancipated, child support terminates without a court order

If paying through the family court, you will need a court order.

If paying support for more than one child, then the emancipation of the oldest child will not terminate a child support obligation for that child. SC Court of Appeals states, "the court simply continues the existing support agreement for the benefit of the minor children until such time as the court, upon request of the supporting parent, can calculate a proper reduction in the support obligation based on a showing of changed circumstances."

In other words, the court will need to be petitioned for a modification if paying support for more than one child. Must be a substantial change of circumstances, and generally will qualify.

An agreement that is made into an order of the court between the parties can require support after the child reaches the age of eighteen and will be enforced by courts as a valid contract. Most of these agreements contain provisions that require support to continue so long as the child is enrolled in school or in situations where the child has a disability or medical problem requiring parental support past the age of eighteen.

Our courts have the power to require parents to contribute toward the expense of higher education in certain situations.

If there are arrearages the support will continue until the arrearages are paid. Contempt actions may be filed if not paid in a timely manner. Our courts typically do not have the authority to forgive or reduce arrearage amounts. However, the parties may agree to drop or reduce arrearages.

Some examples of emancipation include marrying, having a full-time job, or joining the military.

## VII. Enforcement Options

### File a Rule to Show Cause

1. Private action
2. SCDSS

### 3. Do it yourself

Ways Court can order payment:

- a. deducting child support from the non-custodial parent's paycheck
- b. deducting child support from the non-custodial parent's unemployment benefits, Veteran's Disability benefits, Social Security benefits or Worker's Compensation Funds
- c. seizing bank accounts or stocks
- d. seizing personal injury settlements more than \$3,000
- e. seizing or intercepting federal and state tax refunds
- f. revoking or restricting professional, business, occupational or recreational licenses if the non-custodial parent is more than 60 days behind on child support payments
- g. revoking or restricting a driver's license and passport
- h. intercepting unemployment insurance payments
- i. requiring mandatory job training or public service employment for an unemployed non-custodial parent
- j. denying federal loans, including small business loans, farm loans and home loans
- k. reporting a past-due child support debt to credit agencies, which will result in a negative credit report, and
- l. applying a lien against a non-custodial parent's home or personal property.

If found to be intentionally and willfully violating a child support order court may order the following:

- a. Pay a fine of up to \$1,500
- b. Spend up to 1 year in jail
- c. Community service up to 300 hours
- d. Or a combination