

## **State advertising spending – complaint update**

The complaint filed with the Commission at the end of 2018 (SA.53108) investigated the trend in Hungarian state advertising spending between 2006 and 2017. The summary below looks at the subsequent period from 2018 to 2020. It is important to note that the entry into the market of KESMA, which was founded in November 2018 (see our first update on the matter to the original complaint) led to an unprecedentedly high level of ownership concentration in the Hungarian media market – which had its fill of pro-government media oligarchs to begin with. This was also reflected in the relevant data – we found no positive new developments as compared to our earlier complaint: the previous trends continue, and the state continues to distort the market.

From a political perspective, another important development is that the political map has become slightly more colourful since the municipal elections of October 2019. In said election, the opposition took control of Budapest and a few other major cities. State advertising spending includes the advertising spending by the municipal sector, but as will be apparent later, the political changes that have happened since have not had an impact on the overall picture. The municipal sector is grappling with such massive financial difficulties that it would be hopeless for the local governments to try to buy ad space in media outlets with a major audience reach.

Before analysing the data, we need to stress that advertising spending figures in Hungary are not transparent. There are no databases available which show exactly how much the various state institutions spend on advertising in individual media outlets. Regrettably, the Hungarian government can withhold such information without any repercussions. The prevailing practice has been ongoing for years now and the European Commission has not even tried to compel the public release of the relevant data.

Estimates concerning state advertising can be analysed based on the Kantar Media database, which contains so-called list price advertising revenues.<sup>1</sup> This calculates advertising revenues of major media brands based on publicly available lists prices and actual advertising volumes. It is important to note, however, that the database does not extend to every media outlet, however, important political/news brands are missing (e.g., Hír TV and ATV).

In the case of major campaigns, media corporations offer substantial discounts on the list prices. That is why the specific forint amounts mentioned below should not be considered as the relevant measures of the broader point we are making. Instead, the trends and the juxtaposition of the proportions are the most useful in capturing the underlying situation. In the Kantar Media database, the various government ministries, bodies of public administration, municipal governments and state-owned enterprises (SOE) are assigned to the state sector. Business enterprises are not assigned to the state sector, even if it is otherwise well-known that the owners and management of a given company nurture close ties to the governing party.

### **The situation of state advertising spending (2020)**

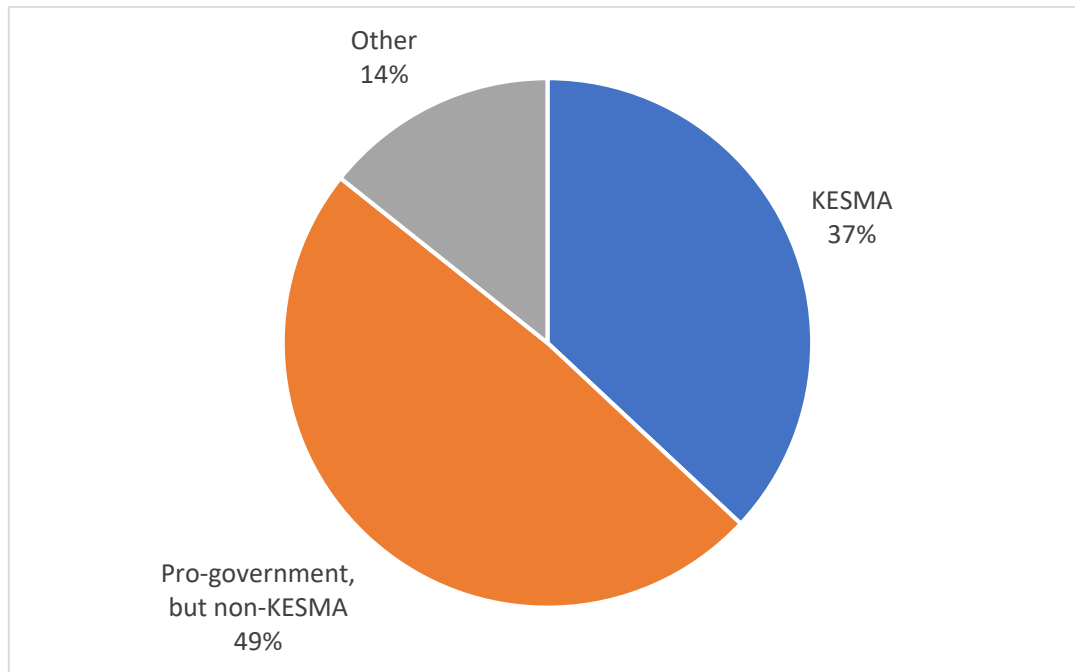
At list prices, the value of all state advertising spending was 128.3 billion forints, but in reality this figure was far lower because it does not – and in the absence of the relevant information it cannot –

---

<sup>1</sup> We use nominal prices.

account for the discounts. What is striking is how these amounts were distributed between the various market players.

Figure 1. Share of state advertising spending (2020)



*Source: own figure based on data from Kantar Media*

The catalogue of KESMA-controlled companies is easy to compile since the official corporate registry records establish clearly which companies are owned by KESMA.<sup>2</sup> Among the companies in the database, Evomedia Ltd (an online sales house), the Hold Reklám Ltd (Retro Rádió) and Mediaworks are owned by KESMA.

We classified those companies which are not owned by KESMA but whose owners are nevertheless unequivocally connected to the government party as falling into the category of “pro-government but owned by KESMA”.

The category of pro-government but not owned by KESMA includes the following:

- **Atmédia Ltd**  
This is the sales house of the commercial television channel TV2. Its owner is affiliated with Lőrinc Mészáros, the prime minister’s confidante and Hungary’s foremost oligarch.<sup>3</sup>
- **Duna Médiaszolgáltató (Duna Media Service Provider)**  
The public service media in Hungary are deeply committed to the governing party.

<sup>2</sup> The link below features a list of the most prominent press and media products owned by KESMA [https://hu.wikipedia.org/wiki/Közép-Európai\\_Sajtó\\_és\\_Média\\_Alap%C3%ADtvány](https://hu.wikipedia.org/wiki/Közép-Európai_Sajtó_és_Média_Alap%C3%ADtvány)

<sup>3</sup> Jandó, Z. (2019): Mészáros Lőrinc bizalmasához kerülhet a teljes Fidesz-közeli tévébiznisz [A confidante of Lőrinc Mészáros may take control of the entire pro-Fidesz television business]. G7.hu, 3 May. <https://g7.hu/vallalat/20190503/meszaros-lorinc-bizalmasahoz-kerulhet-a-teljes-fidesz-kozeli-tevebiznisz/>

- Hamu és gyémánt Ltd  
The company is owned by the HGY Invest Ltd and it is also part of the pro-government media empire.<sup>4</sup>
- Indamédia Holding  
Indamédia (previously CEMP) has been held by investors with close ties to Fidesz for a long time now. It moved into the limelight only in 2020, when they pressured the newsroom of Hungary’s leading online news site, Index. The conflict resulted in the resignation of the entire team and led to the end of the independence of Index.
- Magyar Hírlap Ltd  
Magyar Hírlap is owned by Gábor Széles who is an outspoken supporter of Viktor Orbán’s policies.<sup>5</sup>
- Publimont  
The ownership rights to the outdoor advertising firm Publimont were acquired by a company with ties to Lőrinc Mészáros.<sup>6</sup>
- Radio Plus Ltd  
The Radio Plus company, which operates the Rádió1 network, was acquired by a confidante of Lőrinc Mészáros.<sup>7</sup>
- TV2 Corp.  
The Fidesz ties of the commercial television channel TV2 are well documented. Up until his death, the government commissioner Andy Vajna exercised the ownership rights, but already back in 2016 he sold the channel by way of an options contract through a complex web of companies; TV2 ended up in the hands of other prominent pro-government investors.<sup>8</sup>

All the remaining media corporations apart from the above were assigned to the “other” category, even if the editorial line and practice clearly reflected that the media outlet is leaning towards the government. Thus, our classification scheme was very cautious, and we only assigned those media outlets to the pro-government category where we had unequivocal evidence tying the given media outlet to the government’s sphere of interest.

We assigned a total of 90 media corporations to the “other” category, which includes some major companies (e.g. RTL) and some players that are marginal from a market perspective (such as for example minor magazine publishers).

It is worth taking a separate look at the spending by the largest state advertisers, the Prime Minister’s Cabinet Office.

---

<sup>4</sup> Rádi, A. (2017): Krisko Tibor a filmes biznisszbe tart [Tibor Krisko is on the way to enter the film business]. Átlátszó, 19 June. <https://blog.atlatszo.hu/2017/06/krsko-tibor-a-filmes-biznisszbe-tart/>

<sup>5</sup> Pindroch, T. (2016): Hiánypótló szellemi műhely a cél [The goal is an intellectual workshop that will fill a void]. Magyar Hírlap, 5 November. [https://www.magyarhirlap.hu/belfold/Hianypotlo\\_szellemi\\_muhely\\_a\\_cel](https://www.magyarhirlap.hu/belfold/Hianypotlo_szellemi_muhely_a_cel)

<sup>6</sup> Jandó, Z. (2019): Mostantól Mészáros Lőrinc plakátjairól mosolyoghat ránk Soros György [From now on, George Soros will smile down on us from Lőrinc Mészáros’s billboards]. G7.hu, 26 February. <https://g7.hu/kozelet/20190226/mostantol-meszaros-lorinc-plakattjairol-mosolyoghat-rank-soros-gyorgy/>

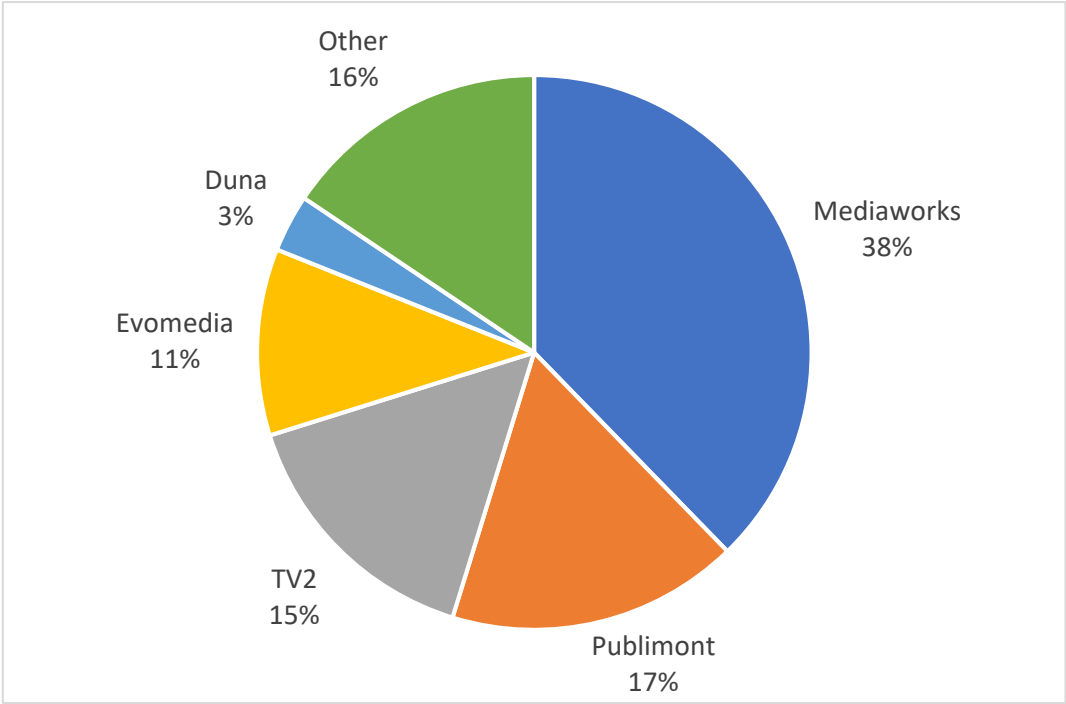
<sup>7</sup> Szalay D. (2020): Mészáros Lőrinc embereihez került a Rádió1 és a Best FM [Lőrinc Mészáros’s people have taken control of Rádió1 and Best FM]. <https://media1.hu/2020/01/21/meszaros-lorinc-embereihez-kerult-a-radio-1-es-a-best-fm/>

<sup>8</sup> Jandó, Z. (2019): Megmutatjuk, ki áll most a TV2 mögött, de hamarosan elrejtőzhet a tulajdonos [Here’s the person behind TV2 – but soon the new owner will be able to hide his identity]. G7.hu, 25 September. <https://g7.hu/vallalat/20190925/megmutatjuk-ki-all-most-a-tv2-mogott-de-hamarosan-elrejtozhet-a-tulajdonos/>

Incidentally, it is also the largest advertiser in Hungary. At list prices, it advertised for a total of 56 billion forints, which makes up 43.6% of all state advertising spending. The advertising spending of the Prime Minister’s Cabinet Office is large enough to massively influence the entire state advertising portfolio.

At the same time, by the nature of its function, the activities of the Prime Minister’s Cabinet Office reflect the government’s overall national policy objectives. The Prime Minister’s Cabinet Office cannot claim to serve a special target group (at least not on ideological basis), and hence such an argument cannot justify a decision to only advertise in certain media outlets. The messages disseminated by the Prime Minister’s Cabinet Office definitely affect every citizen, which is why it would be important to ensure that the ads in question are published in media outlets with different political outlooks. This is especially true in 2020, when the governmental campaigns focus on messages concerning the Covid-19 epidemic. There is no apparent reasonable explanation for the government’s decision to overwhelmingly and disproportionately advertise in media outlets whose owners are closely affiliated with the governing party.

Figure 2. Advertising spending of the Cabinet Office of the Prime Minister (2020)



Source: own figure based on data from Kantar Media

Mediaworks and Evomedia are owned by KESMA.

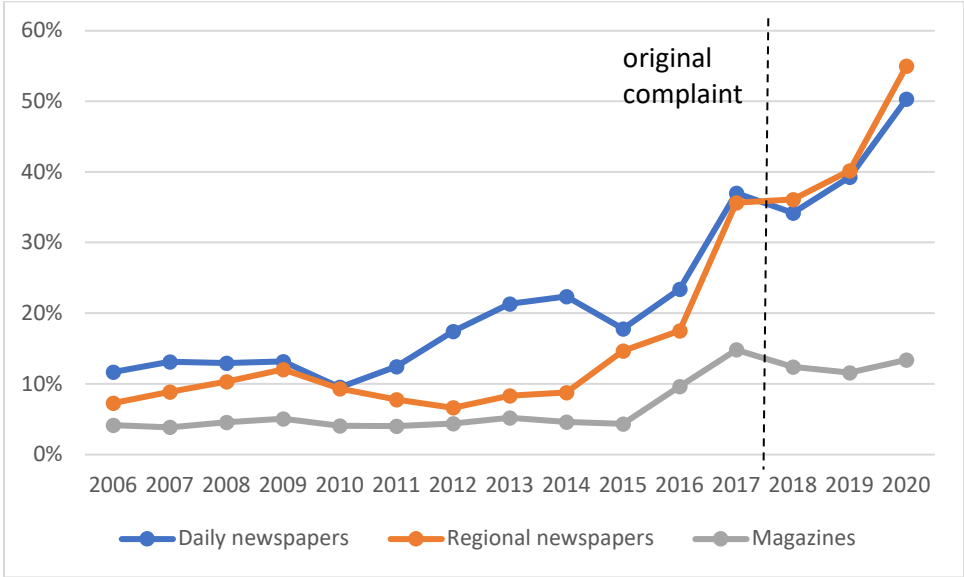
**Trends in state advertising spending (2006-2020)**

The data in the previously filed complaint concerned the period from 2006 to 2017. It is worth taking a look at what has happened in the three years since we concluded our previous analysis. In light of the fact that list prices are only used for orientation purposes and do not reflect actual spending, the

current subchapter does not refer to actual forint prices; instead, we use the share of state advertising as a percentage of total advertising revenue in the given sector. The higher this share, the more dependent the given sector is on state spending, while a low proportion by contrast implies that the sector mostly operates based on market income and the state’s distortive impact on the given sector is not substantial. The data concerning a sector overall may of course obscure major differences between individual media outlets. In other words, it may well be the case that there are media brands in the given sector that are more dependent on state spending while others receive hardly any income from the government.

The line we drew at the 2017 mark in the figure below demarcates the period we analysed in our earlier complaint from the most recent period which is analysed here. Only the data for the period from 2018 to 2020 are new, but the overall trendline is also visible since the figure shows the entire period under analysis.

Figure 3. Share of state advertising revenues (% of total advertising revenues) in print media segments



Source: own figure based on data from Kantar Media

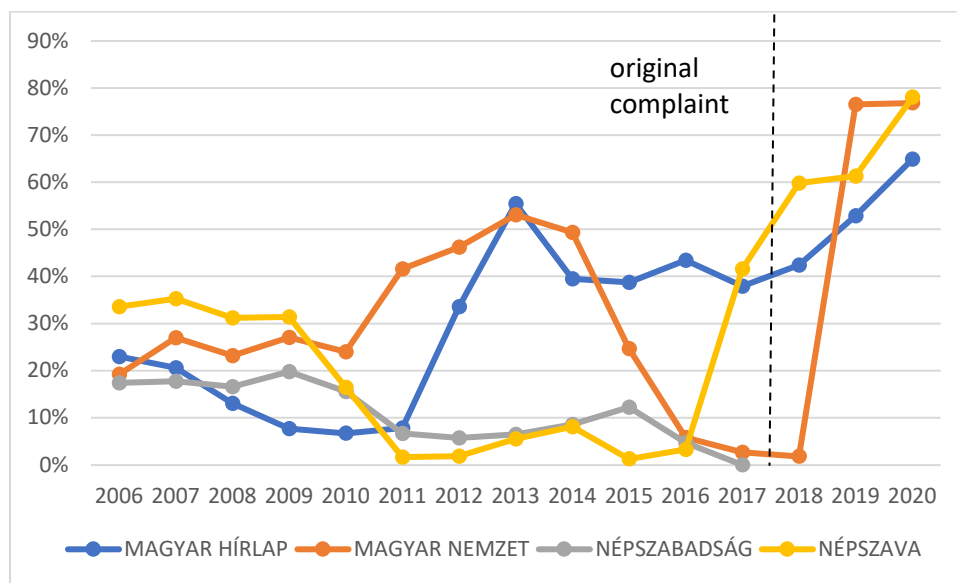
The figure clearly shows that the share of state advertising has grown in the print newspaper sector. The only segment of the print newspaper market that can still be classified as operating under market conditions is the magazine segment, where the revenues predominantly come from commercial advertisers. The thematic outlook of most magazines is of course wholly independent of politics. Most outlets in this segment are consumer and hobby magazines.

Daily newspapers, by contrast (be they national or regional), have essentially become completely dependent on state advertising revenue. Based on the data we can assert that if revenues from the state were to cease, the business model of these magazines would be in serious crisis, and the sustainability of their income would be in doubt.

The Covid-19 pandemic has probably led to a further increase in the state’s share of advertising income in 2020. While looking at all media corporations on the whole, there was barely any decline

in the spending by commercial advertisers (they spent 98.5% of their 2019 spending in 2020), but there was a major drop in the volume of ads in the print sector. In that sector, commercial advertisers spent only 75.1% of what they had spent in 2019, while the 2020 spending of the state advertisers in the print sector was 125.8% of their spending in the foregoing year. In combination, the decline in the activity of commercial advertisers and the increased spending of state advertisers led to a significant surge in the share of state advertising as a percentage of total advertising in this sector last year.

Figure 4. Share of state advertising revenues at major political dailies (% of total advertising revenues)



Source: own figure based on data from Kantar Media

Based on the data, we can assert that in 2020 commercial considerations no longer had a decisive influence in the market for daily political newspapers. If a foreign investor were to enter this market, it would be confronted with rivals which are financially substantially dependent on state resources. It is striking that this is true even of the left-wing newspaper Népszava, which is considered as being affiliated with the opposition parties even though it is readily apparent that a large share of their income depends on state advertisers.

Népszabadság was a traditional left-wing newspaper, and the Hungarian Socialist Party even had an ownership stake in its publishing company, but the newspaper was shut down in 2016.<sup>9</sup>

The history of Magyar Nemzet is described in detail in the sources. Over the past decade, it has had phases in which it was government-friendly and others when it was critical of the government.<sup>10</sup> In

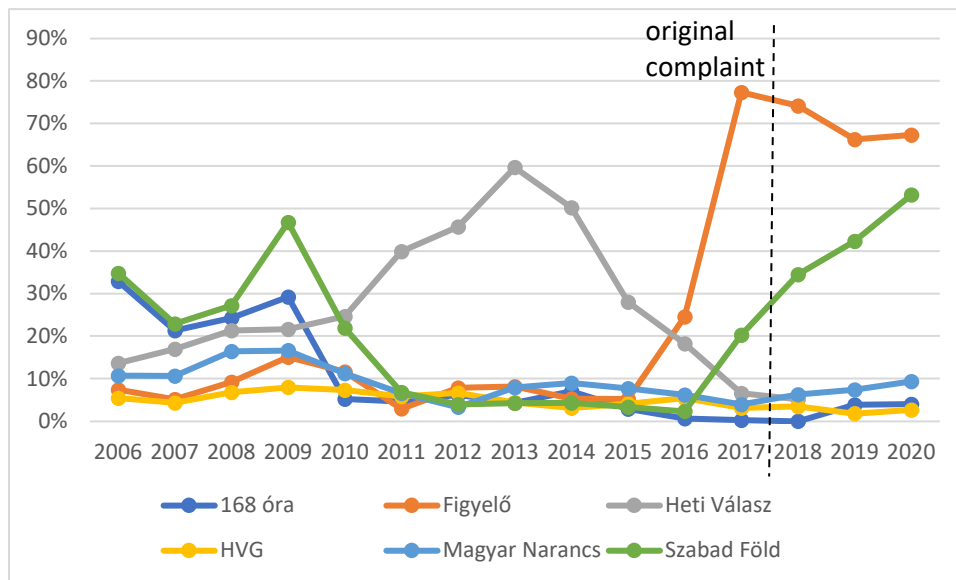
<sup>9</sup> Polyák, G. – Urbán, Á. (2016): A major step towards an authoritarian media regime in Hungary. *Mertek Media Monitor*, 10 October. <https://mertek.eu/en/2016/10/10/major-step-towards-authoritarian-media-regime-hungary/>

<sup>10</sup> Urbán, Á. (2018): Bleeding out the Simicska Empire. *Mérték*, 31 July. <https://mertek.eu/en/2018/07/31/bleeding-out-the-simicska-empire/>

fact, between April 2018 and February 2019 it ceased publishing altogether, and was only relaunched in 2019 as part of the KESMA portfolio.

There were no substantial changes at the publisher of the daily newspaper Magyar Hírlap in the period investigated, but the owner has always been loyal to the prime minister, Viktor Orbán.

Figure 5. Share of state advertising revenues at major political weeklies (% of total advertising revenues)



Source: own figure based on data from Kantar Media

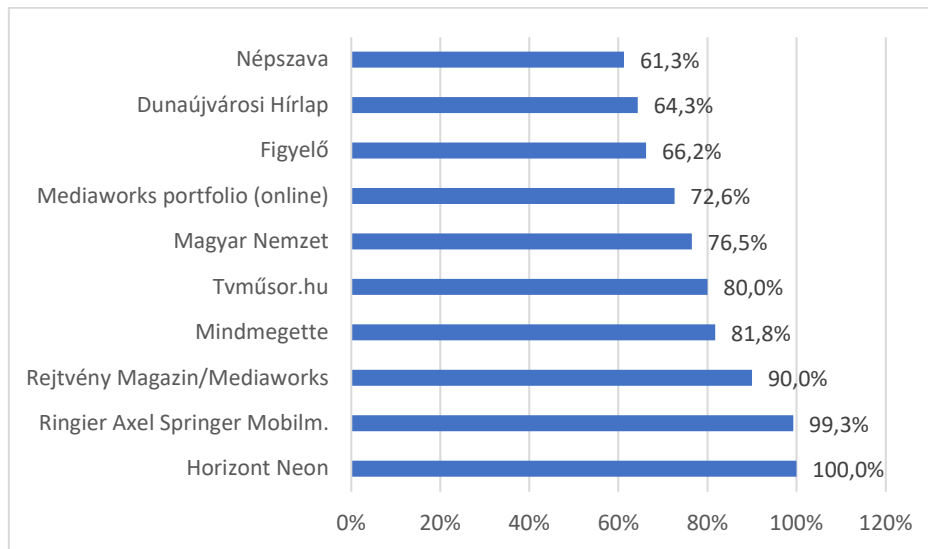
The pattern is also very clear in the market for political weeklies. Heti Válasz ceased operating in the summer of 2018, and a small group of the journalists who were fired from the paper at the time launched their own online newspaper. (Válasz Online has been operating successfully since then, the business model is based on crowdfunding, there are no ads on the website).

Figyelő and Szabad Föld were both acquired by pro-Fidesz investors, and in 2019 they were incorporated into the KESMA empire.

Magyar Narancs and HVG continue to operate as independent outlets, and 168 óra was acquired by a new owner in 2020. 168 óra's new owner has a connection to the governing party, but he denies any plans to turn it into a pro-Fidesz newspaper.<sup>11</sup>

<sup>11</sup> Stumpf, A. (2020): "Nem küldött senki" – az új sajtóbirodalmat építő Milkovics Pál Habonyról és cuki állatkákról [No one sent me" – Pál Milkovics, the engineer of the new media empire about Habony and cute animals]. Válasz Online, 9 October. <https://www.valaszonline.hu/2020/10/09/milkovics-pal-pesti-hirlap-168-ora-interju/>

Figure 6. Media brands with the highest proportion of state advertising as a share of total advertising revenue (2019)

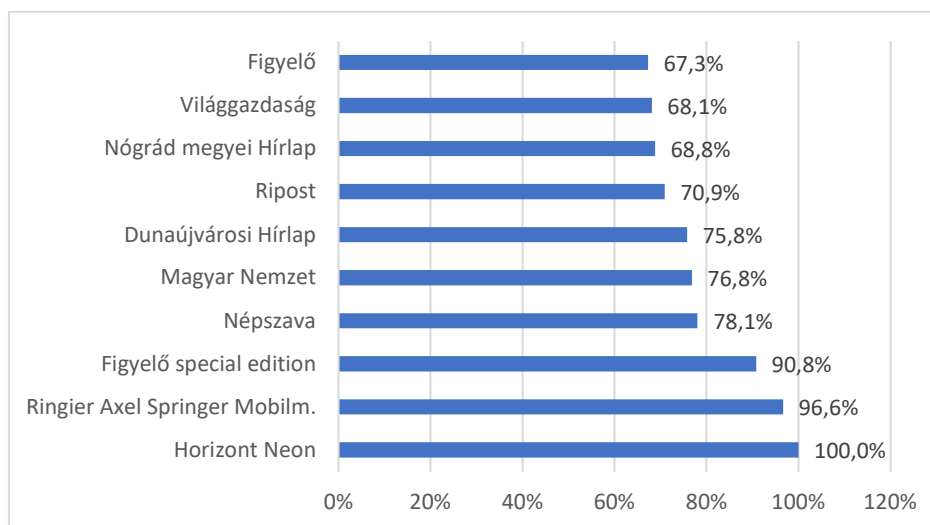


Source: own figure based on data from Kantar Media

Already back in 2019 the ratio of media that were predominantly dependent on the state for their advertising income was exceedingly high. This increased somewhat in 2020, which stemmed in part from the fact that during the pandemic commercial advertisers spent even less than usual on advertising, and hence the share of state advertising increased in several cases.

We only included media brands in the list if they generated at least 10 million HUF (ca. 27.800 EUR) in advertising revenue based on list prices, which means that marginal market players were not taken into account.

Figure 7. Media brands with the highest proportion of state advertising as a share of total advertising revenue (2020)



Source: own figure based on data from Kantar Media



The two lists above are very similar in two respects. First, the dominance of Mediaworks is unequivocal, the media products owned by the publishing company feature seven times on each of the two lists. This also implies that with respect to print publications, the share of state revenues is exceedingly high, which means that this is the segment of the media that is most exposed to state influence. Online and outdoor advertising companies are also present on the list.

Although this is not apparent from the list featuring the Top 10 players, there are also other companies that play a key role in shaping Hungarian public discourse where the share of state revenues is exceedingly high. One such company is the online advertising-focused sales house Evomedia (64% of its revenues are from the state), while other examples worth mentioning are the major outdoor advertising company Publimont (65.5% of its revenues are from the state) and Inforádió (53.8% of advertising revenue come from the state), which broadcasts in Budapest and its environs. These examples are noteworthy because they illustrate that market distortion is present in virtually every segment of the market and that major companies tend to be the ones that profit the most from this phenomenon.

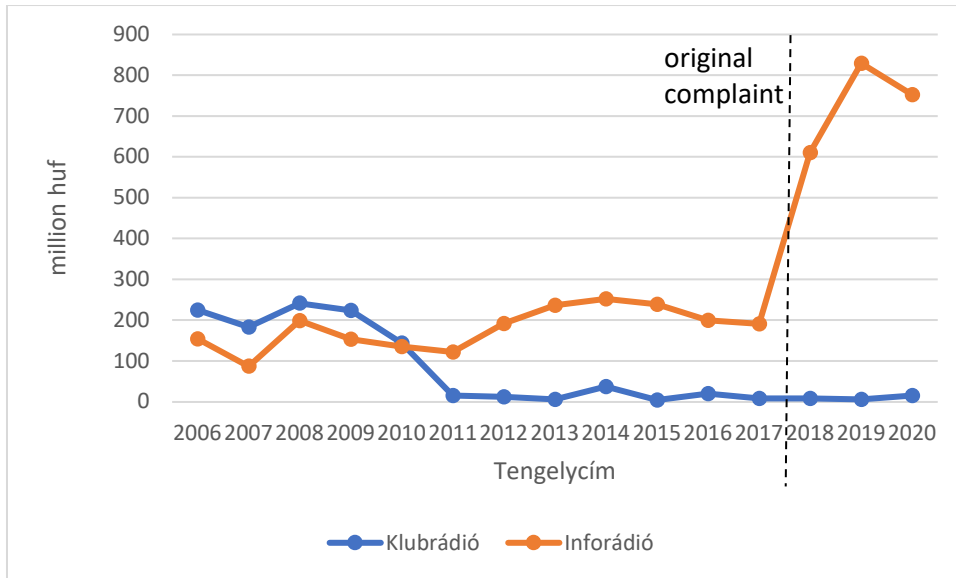
### **Competition between government party and critical media brands (2006-2020)**

To better illustrate the problem of the state's distortive impact on the market, we have selected pairs of media outlets from each segment of the market – with each pair including one independent/critical media outlet and one pro-government media outlet – and we have compared how these have fared in terms of revenue from state advertising. This illustrates the respective situations of government party media outlets and critical media brands. We have highlighted these examples already in the original complaint, but we have found no improvement in the overall situation since then.

#### Klubrádió vs Inforádió

Among the two Budapest talk radios, Klubrádió is very critical of the government, while Inforádió has always been a rightwing station and has never been critical towards Fidesz. It is also important to note, however, that despite its rightwing outlook, Inforádió has never acted as a propaganda media and its owner is also not known for having connections to the governing party. Thus, Inforádió cannot be classified as a radio station that is part of the Fidesz media universe. Nevertheless, the station is rather supportive of the governing party's policies.

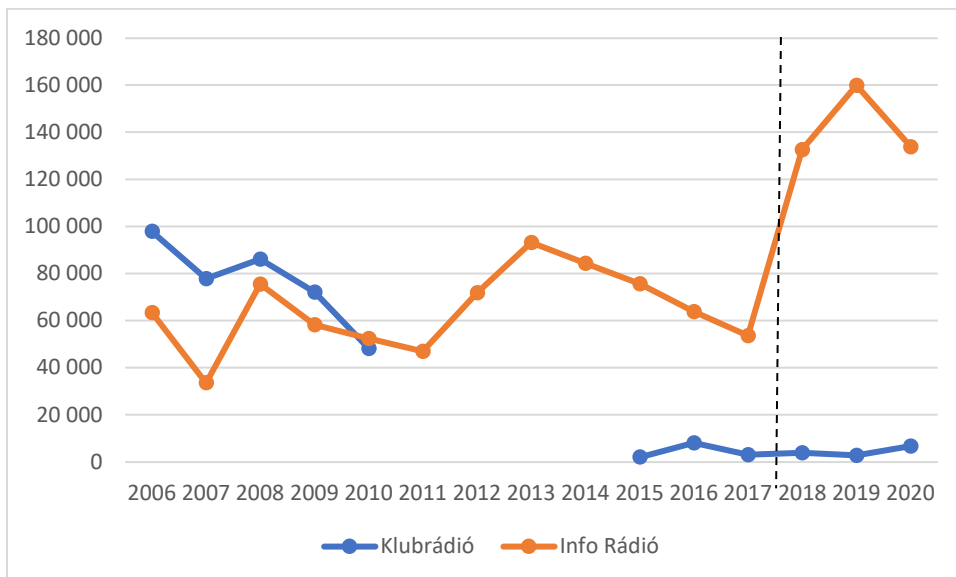
Figure 8. State advertising revenues at Inforádió and Klubrádió (list prices)



Source: own figure based on data from Kantar Media

As is apparent, compared to Klubrádió, Inforádió’s dominance is sweeping when it comes to state advertising. List prices ought to be treated with caution, of course, since we do not know the extent of the discounts that were extended to the ad buyers. But as is apparent in the figure below, the state advertising time measured in seconds shows a trajectory that is very similar to the spending curve.

Figure 9. State advertisements at Inforádió and Klubrádió (seconds)



Source: own figure based on data from Kantar Media

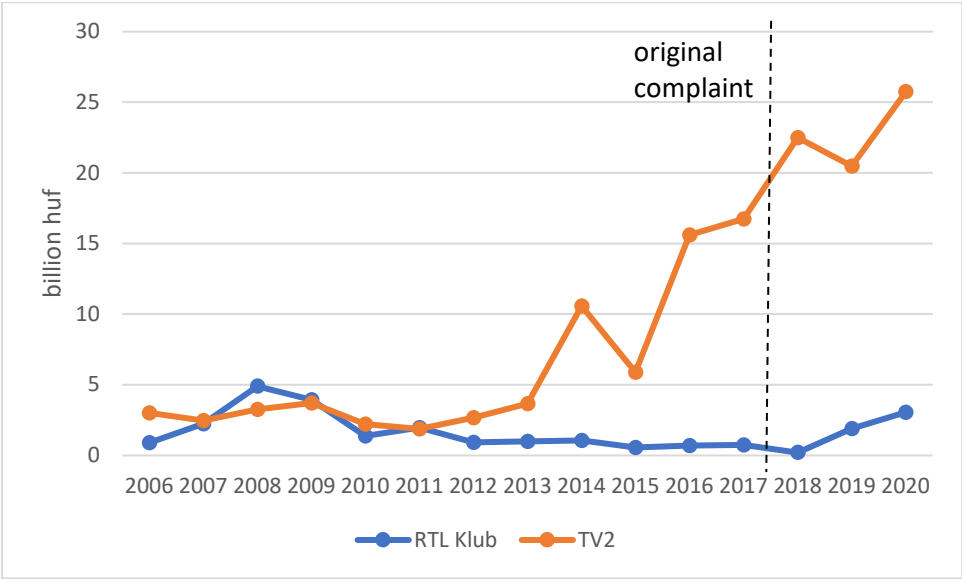
Although the dominance of Inforádió is unequivocal, Klubrádió has also experienced a very slight increase in state advertising spending in 2020. This owed to the fact that in October 2019 the municipal governments of Budapest and several districts were taken over by the opposition and the Budapest public transportation company and a few opposition-led districts purchased some of Klubrádió’s advertising time. Other than that, save for the Budapest municipal government and some municipal corporations, not a single state institution advertised with Klubrádió.

It is interesting to note that the Budapest public transportation company does not advertise only in Klubrádió but also in the radio station at the other side of the political spectrum, namely Inforádió. Hence, the ad buys of the municipal government seem definitely fairer than the national-level advertising strategy. Furthermore, the amount of money spent by municipal governments on advertising is negligible as compared to the amount spent by the central government.

RTL-TV2

The next pair of media we looked at were RTL Klub and TV2, Hungary’s two largest commercial television channels. RTL is owned by a major international corporation, the Luxembourg-based RTL Group, while TV2 is owned by a government-friendly Hungarian owner.

Figure 10. State advertising revenues at RTL Klub and TV2 (list prices)



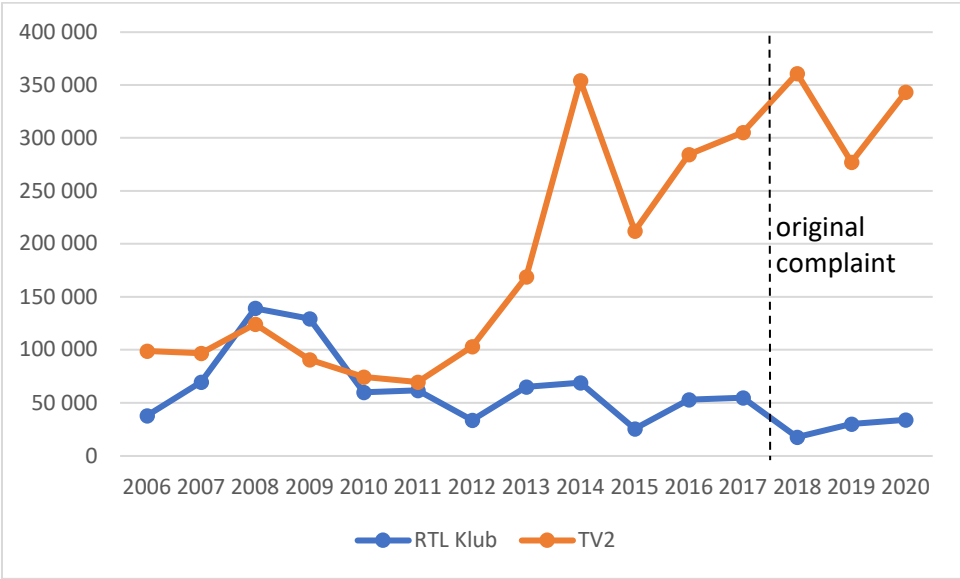
Source: own figure based on data from Kantar Media

We note once again that the list prices need to be treated with caution because they do not reflect the real picture – but in this case we nevertheless have some other data to go by, which informs the broader picture. From the Kantar Media database we know that based on list prices, RTL Klub’s advertising revenue was exactly 3,063,465,000 HUF; the company, in the meanwhile, announced that

it had actually earned 2,495,600,000 HUF.<sup>12</sup> Based on this data, we know that RTL Klub’s actual income was 81.46% of the list prices. If we use the same values and project them onto the information available for TV2, then based on Kantar Media’s calculation of state advertising revenue at list prices for 2020 (25,742,345,000 HUF), the channel’s actual advertising revenue from the state was around 21 billion HUF (ca. 58 million EUR). Theoretically, TV2 might have offered more generous concessions to state advertisers, of course, so these are only estimates.

The figure below shows that percentage-wise, the difference between advertising time measured in seconds is comparatively greater than the difference between amount that the two channels received in forints.

Figure 11. State advertisements at RTL Klub and TV2 (seconds)



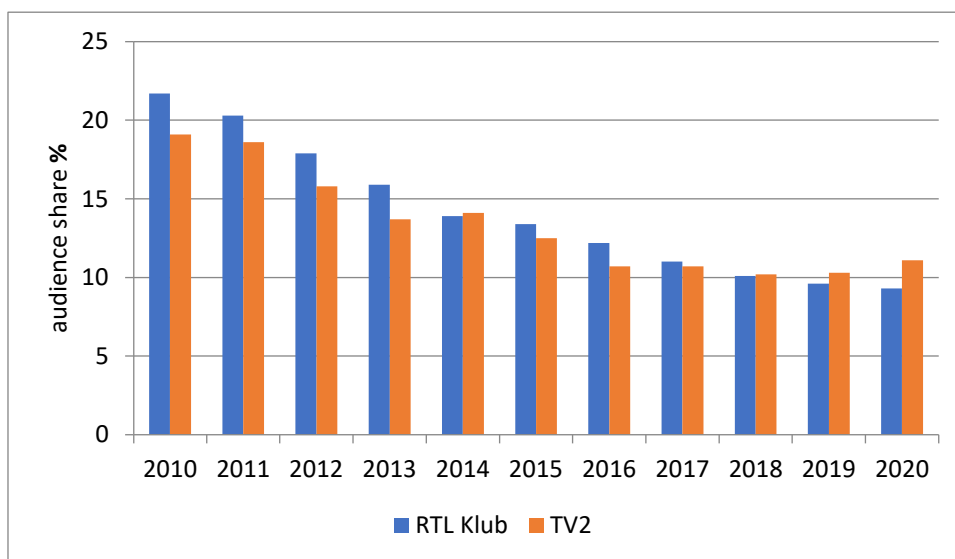
Source: own figure based on data from Kantar Media

It is worth noting that we filed the original complaint at the end of 2018, and we released the underlying report to the Hungarian public in early 2019. It was only after the publication of our report that state advertising began to appear on RTL Klub. We cannot assert, of course, that there is a connection between these two developments, but it is undeniable that the government can use the ads aired on RTL Klub since the publication of the report to claim that it is open to buying ads across the board rather than only advertising with the pro-government media outlets.

The two figures below show that in terms of audience share and revenue, the two channels are neck-and-neck, so apart from political reasons, it is difficult to explain the state advertisers’ one-sided spending in this area.

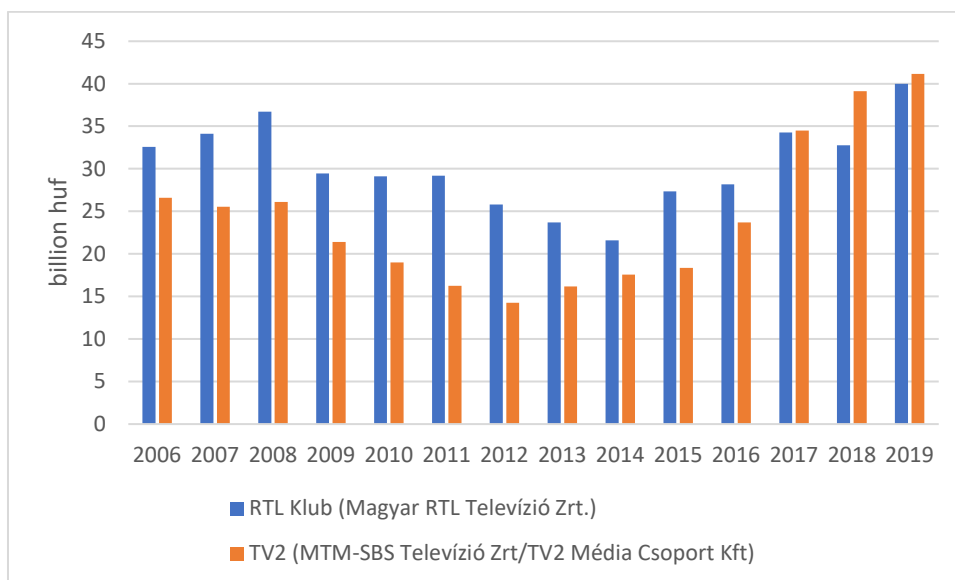
<sup>12</sup> Szalay, D. (2021): Ekkorát nőtt az RTL Magyarország állami reklámbevétele 2020-ban [This is how much RTL Hungary’s advertising revenue increased in 2020]. Media1, 18 January. <https://media1.hu/2021/01/18/rtl-magyarország-allami-reklambevétel-2020-covid19/>

Figure 12. Audience shares of RTL Klub and TV2 from 2010 (4+)



Source: own figure based on data from Nielsen, Media Council and RTL

Figure 13. Revenue of RTL Klub and TV2



Source: own figure based on data from corporate financial reports (<http://e-beszamolo.im.gov.hu/oldal/kezdolap>)

Previously, during the time when state advertising spending was more balanced, RTL had been the more successful of the two commercial channels, both with respect to audience shares and in financial terms. The state's interference in the market has had a visible impact, however, with the result that TV2 is now more successful based on both parameters. This is hardly a coincidence since

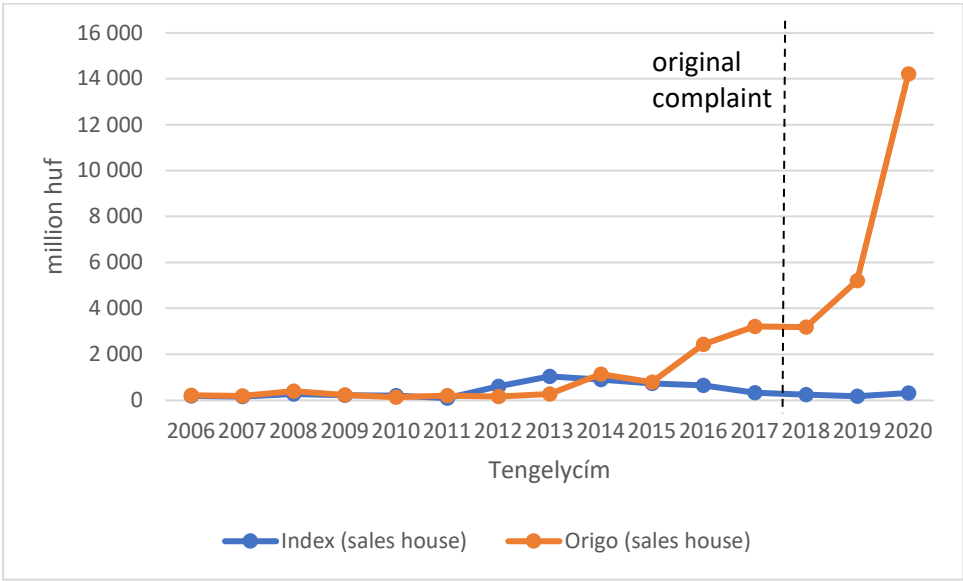
state advertisers evidently increase advertising revenues and thereby they also contribute to the channel’s successful financial operation: TV2 can afford to spend more on expensive shows and on buying more expensive film rights.

As a side note, it is also worth noting that although at this point TV2 enjoys a clear lead in the population overall, in RTL Klub’s main target group, adult viewers between the ages of 18 and 49, the two channels are neck-to-neck.

Index-Origo

The Index-Origo pairing was one of the examples we highlighted in the original complaint, but a lot has happened in this context since then. Index has been captured by the ruling party and the entire newsroom resigned in protest. As a result of the underlying changes, the news site has become less critical towards the government. Thus far, this has left no discernible mark on the online newspaper’s revenues from state advertising, but one of the key questions in the future is whether Index will now be able to pull in more state advertising than previously.

Figure 14. State advertising revenues at the Index sales house and the Origo sales house (list prices)



*Source: own figure based on data from Kantar Media*

In the case of the two major news sites, we only have the relevant data for their respective sales houses. Furthermore, during the past decade and a half, the names of the sales houses have changed, too – but the trends are nevertheless obvious. After Origo was taken over by a pro-government investor in 2015 (the end of 2015), revenue from state advertising surged. We also saw a spectacular surge of state advertising activity at Origo in 2020, which is difficult to explain; such a huge increase in the volume of state advertising is extraordinary even by Hungarian standards.

We expect that after its successful takeover of Index, the governing party will divide its advertising spending less unequally between the two major online news providers. Such a shift has not occurred

thus far, but we need to add that even after the departure of the previous staff, Index remains more balanced in its coverage than Origo. Origo is unequivocally a propaganda outlet, it is one of the key instruments of the governing party's recurring character assassination campaigns.

## Summary

We can assert unequivocally that the market-distorting impact of state advertising continues to persist. The trend that our previous complaint had highlighted and substantiated for the period from 2006 to 2017<sup>13</sup> has continued to shape the Hungarian media landscape between 2018 to 2020.

The figures for the year 2020 are especially dramatic because the governmental campaigns during that year typically revolved around the pandemic (social distancing, restrictions, etc.). It cannot be said that the messages concerning Covid 19 ought to have anything to do with any political sides, and it is definitely not the case that the audience reach of such campaigns should be limited to media consumers who support the governing party. Despite this fact, the government has obviously selected the media where it predominantly advertises based on a politically-driven rationale.

It is important to stress that it is precisely on account of the pandemic and the slight decline in the spending by commercial advertisers, as well as because of the substantial rise in the share of state advertising spending, that the independent media are in a more difficult position financially than ever before. We have seen a massive decline in the selection of political/public affairs outlets. What remains in the critical segment of the media are a few print weeklies, Klubrádió and the online newspapers. At the same time, in September 2020 the Media Authority announced that Klubrádió's frequency, which was due to expire in 2021, would not be renewed on account of recurring violations of the radio's data reporting obligations.<sup>14</sup> Although Klubrádió's two competitors in the frequency tender were disqualified, one of them appealed the decision in court. The tender was suspended, and Klubrádió's broadcasting on an analogue terrestrial frequency ended in February 2021. It is hard to predict the future developments but right now, but the Klubrádió is excluded from the radio market, and its programme is available online.

In Hungary, the presence of larger media corporations with an international background (Ringier-Axel Springer, RTL) is mainly centred on the market for entertainment contents. Independent media outlets in the news market find themselves in a very different and unequal competitive position as compared to their pro-government competitors, which are flush with government money. It is hence no coincidence that almost all independent players are increasingly relying on crowdfunding. For several of them, that is the only way to survive.

---

<sup>13</sup> Bátorfy, A. – Urbán, Á. (2020) State advertising as an instrument of transformation of the media market in Hungary, *East European Politics*, 36:1, 44-65, DOI: [10.1080/21599165.2019.1662398](https://doi.org/10.1080/21599165.2019.1662398)

<sup>14</sup> In practice, the first extension of frequency agreements tends to be automatic in the Hungarian system. It is only customary to deny the extension in the case of major legal transgressions. Naturally, the failure to comply with data reporting obligations does not rank among such major transgressions.