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**IPT**

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

AFFIDAVIT for COMPLAINT

CASE NO.

COMPLAINT

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I, Christopher McKinney, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

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1. I make this affidavit in support of complaint for a violation of 18 U.S.C. 2339B, namely attempting to provide material support and resources to a designated foreign terrorist organization.

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2. I am a Special Agent with the Federal Bureau of Investigation, and have been since September 2010. I received 22 weeks of law enforcement training at the FBI Academy at Quantico, during which investigations of national security and criminal matters were discussed at length. I was assigned to investigate criminal violations and have drafted and executed arrest and search warrants on matters relating to civil rights violations, complex white collar crimes, public corruption and violent crimes against children. In June 2017, I joined to the FBI Joint Terrorism Task Force located in Ripon, California and am assigned to investigate violations of domestic terrorism and international terrorism, including violations of 18 U.S.C. § 2339B (providing, attempting to provide, or conspiring to provide material support or resources to designated foreign terrorist organizations).

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3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

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Based on the facts set forth in this affidavit, there is probable cause to believe that Everitt Aaron Jameson has attempted to provide material support to a foreign terrorist organization in violation of 18 U.S.C. §2339B.

28

**RELEVANT STATUTES**

1 4. Title 18, United States Code, Section 2339B imposes criminal liability on a person who  
2 “knowingly provides material support or resources to a foreign terrorist organization, or attempts or  
3 conspires to do so[.]” In order to violate the law, “a person must have knowledge that the organization  
4 is a designated terrorist organization” or that it “has engaged or engages in terrorist activity . . . or that  
5 the organization has engaged or engages in terrorism . . . .” 18 U.S.C. § 2339B(a)(1).

6 5. Under 18 U.S.C. § 2339B(g)(4), the term “material support or resources” is defined as set  
7 forth in 18 U.S.C. § 2339A(b)(1), as follows:

8 [A]ny property, tangible or intangible, or service, including currency or  
9 monetary instrument or financial security, financial services, lodging,  
10 training, expert advice or assistance, safe houses, false documentation or  
11 identification, communications equipment, facilities, weapons, lethal  
12 substances, explosives, personnel (1 or more individuals who may be or  
include oneself), and transportation, except medicine or religious  
materials[.]

13 6. On or about October 15, 2004, the United States Secretary of State designated al- Qaeda  
14 in Iraq (AQI), then known as Jam ‘at al Tawid wa’ al-Jahid, as a Foreign Terrorist Organization (FTO)  
15 under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global  
16 Terrorist entity under section 1(b) of Executive order 13224. On or about May 15, 2014, the Secretary  
17 of State amended the designation of AQI as an FTO under Section 219 of the Immigration and  
18 Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive  
19 Order 13224 to add the alias Islamic State of Iraq and the Levant (ISIL) as its primary name. The  
20 Secretary of State also added the following aliases to the FTO listing: The Islamic State of Iraq and al-  
21 Sham (“ISIS” – which is how the FTO will be referenced herein), The Islamic State of Iraq and Syria,  
22 ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furquan  
23 Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases  
24 to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

25 **PROBABLE CAUSE**

26 7. As set forth in more detail below, Jameson has espoused radical jihadi beliefs, including  
27 authoring social media posts that are supportive of terrorism, communicating with people he believes  
28

1 share his jihadi views and offering to provide services to such people, including in the form of his  
2 presumably employer-provided tow truck in service of the “cause.” Jameson also has voiced support  
3 for the October 31, 2017, terror attack in New York City during which a driver used his truck to kill 8  
4 people. Jameson commonly refers to people he perceives to be enemies of radical Islam as “kufr,” a  
5 derogatory Islamic term for unbelievers, and specifically told an FBI Confidential Human Source  
6 (CHS) that he “beg[ged] to join the cause against darul kuffar.” Darul (or Dar al, variant Dar ul)  
7 signifies the “land of disbelief” and commonly is used by radical Islamists as a label for the United  
8 States or western nations. Most recently, Jameson met with a person (an FBI Undercover Employee,  
9 “UCE2”) he believed to be associated with senior leadership of the foreign terrorist organization ISIS  
10 and described to the UCE2 his interest in planning and undertaking a violent attack in San Francisco in  
11 support of ISIS. Jameson also described providing the UCE2 with other forms of support, including  
12 financial support.

13 8. On September 19, 2017, a credible FBI Confidential Human Source (CHS)<sup>1</sup> who has  
14 accurately reported to the FBI on national security matters in the past, reported a suspicious Facebook  
15 account. The Facebook persona was Everitt Aaron Jameson, vanity everittj. The Facebook id # was  
16 hidden. The CHS reported Jameson was “Liking” and “Loving” posts that were pro-ISIS and pro  
17 terrorism. To provide an example of the types of posts Jameson was “Liking” and “Loving” during this  
18 time period, the CHS reported to the FBI that Jameson “loved” a post on November 29, 2017 that is an  
19 image of Santa Claus standing in New York with a box of dynamite. The text of the post reads, “ISIS  
20 post image of Santa with dynamite threatening attack on New York.” The Propaganda poster shows  
21 Santa Claus standing on a roof next to a box of dynamite looking out over a crowd of shoppers with the  
22 words “We meet at Christmas in New York...soon.” Under this post, Jameson selected the “Like”  
23 option and then selected the “Heart” option to signify that he “Loved” the post.

24 9. On October 24, 2017, the CHS and Jameson communicated via private messages. During  
25 those communications, Jameson stated that he was committed wholehearted [to the cause].  
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27 <sup>1</sup> The FBI opened the CHS on or about July 16, 2017. FBI considers this source reliable and  
28 his/her information has been corroborated as about 12/20/17. The CHS has been paid approximately  
\$2600.00 for his services.

1           10.    On October 27, 2017, Jameson messaged the CHS stating with, "Salaam Alaykium  
2 warmatulAllah wabarakatu, I am here to beg to join the cause against darul kuffar. I'm ready." The  
3 CHS replied, "Wa alaykumi as-salam. Patience."

4           11.    On October 29, 2017, the CHS messaged Jameson, "Are you a revert?" Jameson replied,  
5 "Yes. I am. That is what will make me more useful. I can blend in. Or shock and awe." The CHS  
6 replies, "When did you say your Shahada. Yes. Allah does things this way!" Jameson responded,  
7 "Amin! Allah is the best of planners. I took my Shahada two years ago. At the Merced Islamic Center  
8 of Merced CA USA." The CHS replied "Alhamdulillah! and I see from some of your postings you  
9 work for a lift service - so you are not kuffar police. Again patience. I am at a cafe and need to log off.  
10 Have a blessed day." Jameson answered, "I am a tow truck driver. So I can make these services  
11 available as well. Sabr. InshAllah we will speak soon again. Salaam Alaykuim warmatulAllah  
12 wabarakatu Sister. May Allah reward you for your good work."

13           12.    Based on my training and experience, the above-referenced communications reflect that  
14 Jameson was establishing his Islamic credentials with the CHS, after which he offered his services as a  
15 tow truck driver to the CHS for purposes of supporting "the cause against darul kuffar." Based on my  
16 training and experience and the context of Jameson's interactions with the CHS, I assess that Jameson  
17 perceives "the cause" to signify engaging in terrorism to undermine the United States.

18           13.    The CHS reported that on October 31, 2017, Jameson posted "Walokiom assalaam  
19 rhmatullaha wabarakatu. Yes the will. As today they celebrate Shaytan. A'oodah Billah. The Kuffar  
20 will learn the lesson soon enough InshaAllah. And it's ok. I have sabr. I understand. Today is the day  
21 the Kuffar are going to revel in sin." The CHS then reported that Jameson posted a GIF of a crowd  
22 giving a standing ovation to an article discussing the October 31, 2017, terror attack by an individual  
23 who crashed a rented pickup truck into a group of cyclists and runners, killing 8 people and injuring 11  
24 people in New York City.

25           14.    The CHS reported that on November 2, 2017, the CHS had a conversation about the  
26 October 31, 2017, terror attack. Jameson stated to the CHS, "Allahu Akbar! It says he was one of us.  
27 May Allah Grant him Jannah firtuidus Amin". The CHS replied to Jameson by asking the question,  
28 "Us?" Jameson responded "Muslim sister. I heard he was uzbek Muslim." To this, the CHS replied,

1 "Yes!" Jameson then responded, "Alhamdulillah. I'm glad to know we Muslims are finally hitting back.  
2 Allahu Akbar! The Kuffar deserve everything and more for the lives they have taken."

3 15. Based on my training and experience, the above-referenced communications reflect that  
4 Jameson identifies himself as associated with the same cause as the perpetrator(s) of the New York City  
5 terror attack. According to the indictment charging Sayfullo Saipov with the terror attack, he agreed to  
6 provide material support to ISIS, further supporting my belief that Jameson is or is attempting to  
7 provide material support to ISIS. "Jannah firtuidus Amin" is an Islamic term referring to paradise, and  
8 I assess that Jameson's use of this term reflects that he hopes the perpetrator(s) of the New York City  
9 terror attack were received into paradise.

10 16. On November 3, 2017, Jameson filled out a "Franchise Tow Truck Driver Application"  
11 with the Modesto Police Department (MPD) to be affiliated with a local towing company which has a  
12 contract with the City of Modesto. In the application, Jameson listed his telephone number as 209-xxx-  
13 xxxx and identified as his residence an address in Modesto I have verified through physical  
14 surveillance is Jameson's personal residence.

15 17. On November 27, 2017, FBI Special Agents from the Fresno FBI office conducted  
16 surveillance in the vicinity of the local towing company. Jameson was observed in front of the local  
17 company wearing work clothes consistent with employment.

18 18. On December 7, 2017, an FBI surveillance team conducted surveillance in the vicinity of  
19 the local towing company and observed Jameson driving a tow truck around the greater Modesto, CA  
20 region.

21 19. On December 11, 2017, an FBI employee ("UCE1") working in an undercover capacity  
22 began using a social media platform to communicate with Jameson.

23 20. On December 12, 2017, UCE1 messaged Jameson, stating among other things, "We are  
24 in desperate times." Jameson responded by stating, among other things, "Cal [*sic*] on me when I'm  
25 needed. Anything for Dar al Islam. Anything for our Ummah."

26 21. The following day (December 13), UCE1 engaged in communications with Jameson in  
27 which he explained among other things that "the Sheikhs" wanted to know how Jameson was "able to  
28 help" and "to make sure you (Jameson) are ready." Jameson stated, "Anything. Tell them anything. I

1 can suit up and take myself to our brothers. Or whatever they need done here.” Jameson continued,  
2 “Alhamdulillah. I know this very well. I have no doubt. I am ready. Give the word and it shall be  
3 done.”

4 22. Thereafter, UCE1 reiterated, “I know you mentioned you will help in anyway is there  
5 anything specific you had in mind which you believe would be helpful in this work? If not it is ok akhi.  
6 Allah is the best of planners”. Jameson replied (in substance) “I was a soldier in the Kuffar army  
7 before I reverted. I have been trained in combat and things of war. In Sha Allah anything of that  
8 nature, as well as funding. Anything for Allah. He is the best of planners Alhamdulillah. In Sha Allah,  
9 I will be waiting.” UCE1 replied “Indeed. I will pass this along and by the grace of Allah we will talk  
10 soon.” Jameson replied, “Jazak Allah, In Sha Allah we will speak about the same time.”

11 23. Based on my training and experience and review of documents in the investigation, I  
12 believe Jameson’s reference to “I was a soldier in the Kuffar arm” refers to Jameson’s prior military  
13 experience. In particular, Jameson’s discharge papers from the U.S. Marine Corps (DD-214 and related  
14 documents) reflects that in or about June 2009, Jameson attended basic recruit training and graduated  
15 several months later. During this time, Jameson earned a “sharpshooter” rifle qualification. Although  
16 Jameson ultimately was discharged from the U.S. Marine Corps for fraudulent enlistment (it was  
17 revealed that Jameson failed to disclose a latent asthma history), I am informed and believe Jameson  
18 intended to and did offer to provide to UCE1 his military experience, including his expertise with rifle  
19 marksmanship.

20 24. On December 14, 2017, UCE1 messaged Jameson and stated among other things, “I have  
21 news for you but I trust you know that what we are talking about and sharing is between you, me and  
22 Allah only.” UCE1 continued, “A brother will be contacting you in the next day or so.” Jameson  
23 replied “ ... I will be waiting with anticipation.” UCE1 then inquired with Jameson as to a way for his  
24 brother” (associate) to contact Jameson, and Jameson provided the UCE with a telephone known to be  
25 used by Jameson which Jameson confirmed to the UCE was his only cell phone. The UCE then  
26 discussed with Jameson his plan for facilitating contact between the UCE’s “brother” and Jameson.

27 25. On December 16, 2017, UCE2, mentioned previously in Paragraph 7, sent Jameson a text  
28 message on the known cellular telephone associated with Jameson which was the number he provided

1 as his contact number. UCE2 referred to the instructions UCE1 and Jameson discussed on December  
2 14 (described above) and confirmed that he was contacting Jameson pursuant to the UCE'S  
3 instructions, by stating among other things, "I am in the area today if you want to meet let me know."  
4 Jameson confirmed his readiness and availability to meet, replying "InshaAllah, yes. Where at Akhi?"  
5 UCE2 and Jameson then exchanged additional communications regarding a future meeting.

6 26. Eventually, the UCE2 and Jameson successfully arranged a meeting. As he explained his  
7 preparation to travel to the meeting, Jameson told the UCE2, "... I'm getting my family's car now.  
8 I'm on my way." During this communication, FBI physical surveillance observed Jameson departing  
9 the residence in a black Chrysler 300. Jameson drove the vehicle directly to a location he previously  
10 discussed with UCE2.

11 27. On December 16, 2017, at approximately 17:50, Jameson followed a series of directional  
12 commands provided by the UCE2 to Jameson to locate the UCE2's vehicle (the ultimate meeting  
13 destination). Jameson was then directed to sit in the passenger seat of the vehicle, directly in front of  
14 the UCE2. Within minutes of entering the vehicle, Jameson expressed that he was willing to do  
15 anything for "the cause." Jameson said that he was ready. UCE2 questioned Jameson and asked if he  
16 knew who he was meeting with. Jameson acknowledged that he understood and confirmed that he did  
17 not disclose the meeting to anyone. UCE2 stated that he did not want there to be any confusion or doubt  
18 and asked Jameson if he knew who Abu Bakr al-Baghdadi was. Jameson stated that he did know, and  
19 UCE2 informed Jameson that UCE2's boss was al-Baghdadi. Jameson provided a positive response  
20 and appeared pleased with UCE2's affiliation. Based on my training and experience, I am aware Abu  
21 Bakr al-Baghdadi is the leader of the foreign terrorist organization "Islamic State of Iraq and al-Sham"  
22 (ISIS). I believe Jameson's response demonstrates Jameson's awareness that he was meeting with a  
23 person he believed to be affiliated with the senior leadership of ISIS. This is consistent with my review  
24 of other information including postings Jameson made on his Facebook page supportive of ISIS, further  
25 demonstrating his knowledge of and support for ISIS.

26 28. During the meeting, the UCE2 stated that he heard Jameson had something to offer and  
27 asked for further clarification. Jameson said that he was an Infantryman and was well versed in the  
28 "Anarchist Cookbook" (a reference to a book I am aware is publicly available and discusses among

1 other things the construction of improvised explosives and devices). The UCE2 asked Jameson about  
2 his capabilities. Jameson responded that he was a tow truck driver, had the ability to provide money,  
3 and was willing to travel to Syria. Jameson volunteered that he got paid twice a month and could  
4 provide \$400 per month. On three or four separate occasions, the UCE2 encouraged Jameson to go  
5 home and think about what he was saying. The UCE2 told Jameson he should take time to think about  
6 moving forward, but Jameson rebuffed the UCE2's requests, maintaining that he was ready and  
7 prepared to proceed.

8 29. Eventually, Jameson stated that we need something along the lines of New York or San  
9 Bernardino. Based on my training and experience, I am aware that Jameson's mention of "San  
10 Bernardino" refers to a shooting-related terrorist attack undertaken in 2015; I believe the "New York  
11 attacks" Jameson mentioned refers to the same October 31 terrorist attack discussed above. Jameson  
12 identified a possible target location, noting that the best place would be a large area such as San  
13 Francisco. The UCE2 told Jameson that San Bernardino and New York were distinctly different  
14 attacks and asked for clarification. Jameson replied that he wanted to use a combination of the two  
15 (which I believe is a reference to inflicting casualties through the use of a vehicle and firearms).

16 30. Jameson specifically named Pier 39 in San Francisco as a target location because he had  
17 been there before and knew that it was a heavily crowded area, and that, according to Jameson, no  
18 reconnaissance or site survey would be necessary (because Jameson already was familiar with the area).  
19 Jameson explained that he also desired to use explosives, and described a plan in which explosives  
20 could "tunnel" or "funnel" people into a location where Jameson could inflict casualties. UCE2 asked  
21 Jameson about the operational timeline. Jameson replied that he could do it this week (the week of  
22 December 18 through December 25, 2017). Jameson also stated that Christmas was the perfect day to  
23 commit the attack. When asked by UCE2, Jameson said he did not have and did not need an escape  
24 plan because he was ready to die. UCE2 instructed Jameson not to do anything without his knowledge  
25 and said that he would need to get approval from his bosses (a reference to al-Baghdadi). Jameson  
26 acknowledged that he understood.

27 31. UCE2 asked Jameson what assistance the UCE2 could provide. Jameson stated that he  
28 needed ammunition, powder, tubing, and nails. When asked what kind of a weapon he would need,

1 Jameson noted that he would prefer an assault rifle. He also explained that he was trained in both the  
2 M-16 and an AK-47 rifle. Jameson also stated that he needed timers and remote detonators  
3 (presumably for the explosive charges Jameson previously described to the UCE2). Jameson said that  
4 he could get the PVC pipe, nails, and powder (presumably, black powder used for commercial  
5 explosives and ammunition). Based on my training and experience, I am aware that rudimentary  
6 explosives, such as pipe bombs, may be constructed with such readily-available materials as pipes,  
7 nails and explosive powder (such as black powder used in rifle ammunition reloading).

8 32. UCE2 asked Jameson if he had a suitable location to build the devices. Jameson replied  
9 that he would go to the mountains, build the devices at a remote campground, and then return home  
10 where he would store the devices. UCE2 asked Jameson if he was willing to do a video or write a  
11 statement for the brothers. Jameson stated that he would write a statement, but he would need UCE2's  
12 help in doing a video. UCE2 advised that he would be in contact and ended the meeting.

13 33. Shortly after the meeting concluded, Jameson transmitted a text message to UCE2  
14 confirming "It is written." Jameson further explained that "It is half a page long and by me. It's in my  
15 hand, and stated it's me. In Sha Allah it will be what is needed. I will be back late night tomorrow.  
16 Around 11pm to Midnight."

17 34. Later, on December 18, 2017, UCE2 initiated contact with Jameson and asked if they  
18 were meeting that day, and also asked if he can get pictures of the trip we are going to take for "Xmas".  
19 In response, Jameson sent a photograph depicting a map of Pier 39, and 2 photographs depicting areas  
20 of what appears to be Pier 39. He also sent one photograph depicting what appeared to be Pier 39.

21 35. Later on December 18, 2017, an FBI employee, using an identifiable telephone number  
22 with a Washington, D.C. area code (202) mistakenly called Jameson's cellular telephone. After  
23 Jameson answered in apparent Arabic language, the FBI employee immediately terminated the call.  
24 Shortly afterwards, Jameson called the 202 telephone number, which resolves to a voice mail  
25 identifying the name (but not employing agency) of user of the 202 telephone.

26 36. Later during that afternoon (December 18, 2017), UCE2 and Jameson again engaged in  
27 communications regarding a follow-up meeting. Among other things, UCE2 asked Jameson whether  
28 he could locate and rent a storage unit for use in preparing for their operation. Jameson confirmed that

1 he could and later advised UCE2 that he had possibly located a storage unit.

2 37. Later during the evening, the UCE2 contacted Jameson to discuss arranging a follow-up  
3 meeting. Jameson responded by indicating that he had been "very busy tonight." Moreover, Jameson  
4 told the UCE2, "I also don't think I can do this after all. I've reconsidered." The UCE2 stated, "We  
5 only can do Allahs will," and Jameson replied "In Sha Allah one day I can. But I can't."

6 38. On December 20, 2017, a search warrant, issued in the United States District Court for  
7 the Eastern District of California on December 19, 2017, was executed at the residence located in  
8 Modesto, CA. at 8:04 .The purpose of the search was to gather evidence in support of the ongoing  
9 investigation.

10 39. Among the items seized was a white envelope containing handwritten letter signed by  
11 Abdallah Abu Everitt Ibn Gordon Al-Amriki dated 12/16/17. That letter reads as follows:

12 12-16-17

13 I Abdallah adu Everitt ibn Gordon have committed these acts upon the  
14 Kuffar, in the name of Dar al Islam, Allahu AKbar! You all have brought  
15 this upon yourselves. There are no innocent Kuffar! Each and every  
16 Kuffar in this Nationalistic, Godless society has a hand in this. You've  
17 Allowed Donald J Trump to give away Al Quds to the Jews. Both You  
18 and he are wrong, it belongs to the Muslemeen. We have penetrated and  
19 infiltrated your disgusting country. These Acts will continue until the  
20 Lions of Islam overtake you. Turn to Allah, make tawbah and fight with  
21 us, the soldiers who fight in the day and the night. Allah SWT is most  
22 forgiving, I am not. Long live Isil, Long Live Abu Bakr al-Baghdadi.  
23 Allahu Akbar!

24 Abdallah abu Everitt ibn Gordon al-Amriki

25 (signature)

26 40. One envelope was also found that contained the Last Will and Testament of Everitt  
27 Aaron that was executed on 11/16/17.

28 41. In addition the following firearms and firearm related material were seized: One  
dealer's receipt of sale of firearm to Everitt Aaron Jameson, Sr. dated 01/03/17; two .45 caliber  
magazines: One empty, one containing 7 rounds of ammunition, three cylinder fireworks in a paper  
back, once cylinder firework in black material, one Winchester .22 caliber rifle, One Rugers Model  
M77, one black ammunition holder, containing six rounds of ammunition, One Sturm, Ruger 9mm

1 handgun, one empty handgun magazine.

2 42. During the search of the residence, FBI Agents interviewed Jameson. At periodic times  
3 during that interview Jameson stated his support of ISIS and terrorism and discussed aspects of the plan  
4 to carry out an attack, noting that he would be happy if an attack was carried out.

5 **REQUEST TO SEAL**

6 43. I further request that the Court order that all papers in support of this complaint be sealed  
7 until further order of the Court. These documents discuss an ongoing criminal investigation that is  
8 neither public nor known to all of the targets of the investigation. According, there is good cause to  
9 seal these documents because their premature disclosure may seriously jeopardize that investigation.

10  
11 Respectfully submitted,

12 

13 Christopher McKinney  
14 Special Agent  
Federal Bureau of Investigation

15 SWORN TO BEFORE ME, AND SUBSCRIBED  
16 IN MY PRESENCE THIS 22 DAY OF  
17 DECEMBER, 2017.

18   
19 \_\_\_\_\_  
Hon. Barbara A. McAuliffe  
U.S. MAGISTRATE JUDGE

20  
21 /s/ Dawrence W. Rice, Jr.  
22 \_\_\_\_\_  
Approved as to form by  
23 AUSA DAWRENCE W. RICE, JR.  
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