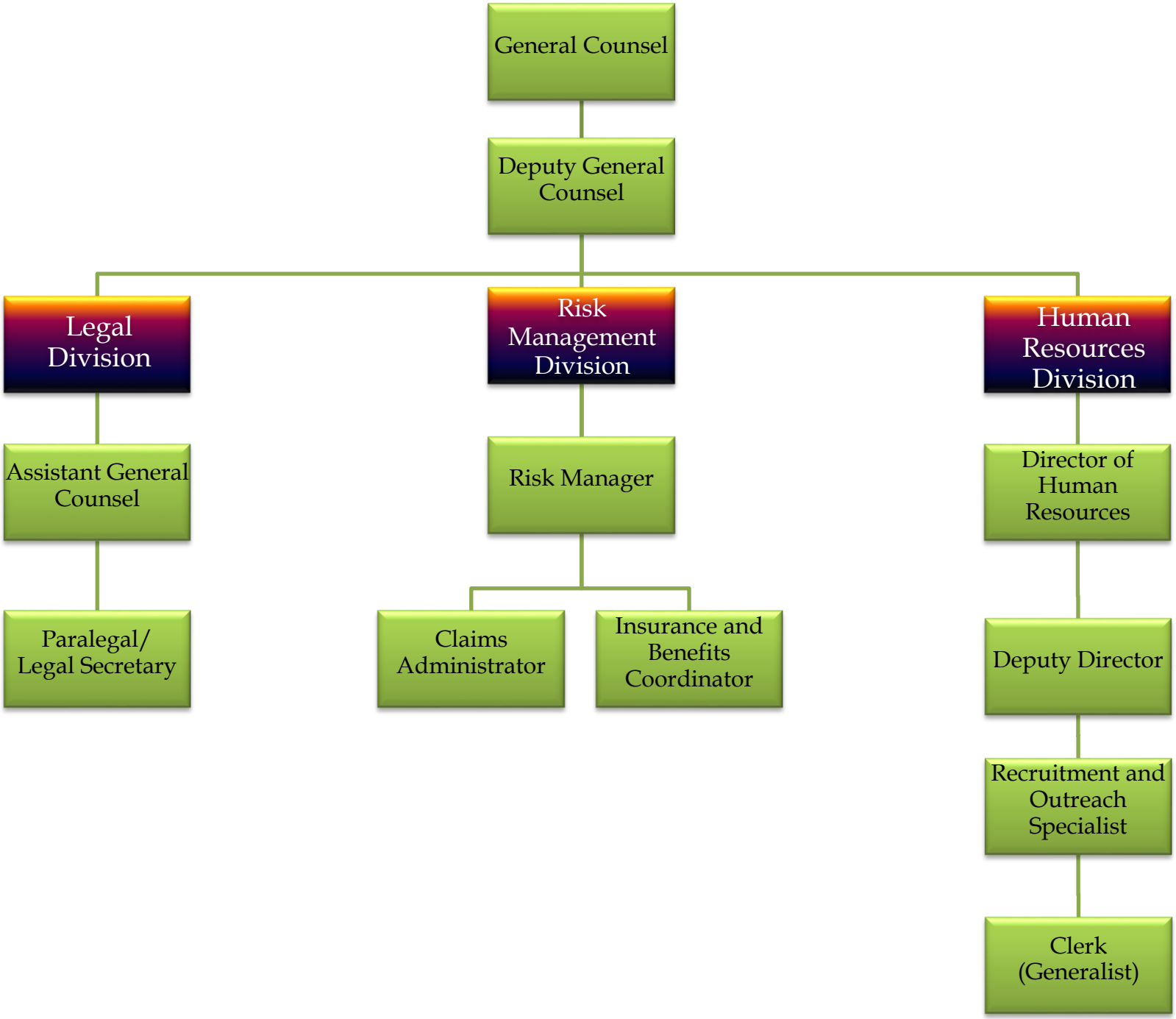Office of the General Counsel