

IN THE SUPERIOR COURT OF HALL COUNTY  
NORTHEASTERN JUDICIAL CIRCUIT  
STATE OF GEORGIA

INDICTMENT

WITNESSES

CASE NO. 2008CR227B  
JANUARY Term, 2008

THE STATE OF GEORGIA

vs.

**CHARLOTTE JO BAGHOSE**

OFFENSE(S): THEFT BY TAKING (FELONY); FORGERY IN  
THE FIRST DEGREE (29 COUNTS)

*TRUE*

Bill

*[Signature]*

Foreperson

The Defendant herein waives formal arraignment/  
indictment by grand jury and pleads:  
**GUILTY NOT GUILTY NOLO CONTENDERE**  
This \_\_\_\_ day of \_\_\_\_\_, 200\_\_.

Defendant

Attorney for Defendant

By: \_\_\_\_\_  
Assistant District Attorney

Margaret Dawson, GPD

Jim Merriman  
ZF Industries  
1261 Palmour Drive  
Gainesville, GA 30501

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BY *[Signature]*

The Defendant herein waives formal  
arraignment/indictment by grand jury and pleads:  
**GUILTY NOT GUILTY NOLO CONTENDERE**  
This \_\_\_\_ day of \_\_\_\_\_, 200\_\_.

Defendant

Attorney for Defendant

By: \_\_\_\_\_  
Assistant District Attorney

**BILL OF INDICTMENT**

STATE OF GEORGIA, COUNTY OF HALL

IN THE SUPERIOR COURT OF SAID COUNTY

THE GRAND JURORS SELECTED, CHOSEN AND SWORN FOR THE COUNTY OF HALL, TO-WIT:

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~~Thomas C. Mundy, Sr.~~ *dcj*  
Geraldine Fitzpatrick  
Dale B. Holmes, Sr.  
Christopher Justin Hulsey  
Roger A. Matthews  
Joann Quillian  
Cain Cuevas  
Gwen Hensley

Sherrie W. Hales  
~~Will Hicks, Jr.~~ *dcj*  
Joseph B. Biddy  
Joann C. Banks  
~~Wendy E. Palmer~~ *dcj*  
Stephanie Lynn Sartain  
Steve McDonald  
Teri D. Minor

Benjamin Thomas Ingle  
~~Brian K. Jones~~ *dcj*  
~~Teresa Davis Thamer~~ *dcj*  
Curtis Hatcher  
Helen Puckett  
Doris C. Jones  
Stephen B. Brock

In the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **THEFT BY TAKING (FELONY)**, for that the said accused in the County of Hall and the State of Georgia **BETWEEN AUGUST 12, 2002 AND JULY 11, 2007**, did unlawfully take monetary funds, the property of ZF Industries, with a value of more than \$500.00, with the intention of depriving said owner of said property in violation of O.C.G.A. § 16-8-2, said offense being unknown until August 14, 2007, contrary to the laws of said State, the good order, peace and dignity thereof.



**COUNT TWO**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **11<sup>TH</sup> DAY OF JULY, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 217930 made payable to [REDACTED] in the amount of \$956.80, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

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**COUNT THREE**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **30<sup>TH</sup> DAY OF MARCH, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 45250 made payable to [REDACTED] in the amount of \$2,528.81, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

**COUNT FOUR**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **30<sup>TH</sup> DAY OF MARCH, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 45258 made payable to [REDACTED] in the amount of \$2,316.61, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

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**COUNT FIVE**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **2<sup>ND</sup> DAY OF MARCH, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 45002 made payable to [REDACTED] in the amount of \$2,010.87, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.



**COUNT SIX**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **2<sup>ND</sup> DAY OF MARCH, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 45005 made payable to [REDACTED] in the amount of \$2,054.99, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

**COUNT SEVEN**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **2<sup>ND</sup> DAY OF MARCH, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 45001 made payable to [REDACTED] in the amount of \$2,332.84, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

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**COUNT EIGHT**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the 11<sup>TH</sup> DAY OF JULY, 2007, did with intent to defraud knowingly make and possess a writing, to-wit: check number 217954 made payable to [REDACTED] in the amount of \$1,651.16, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

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**COUNT NINE**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the 11<sup>TH</sup> DAY OF JULY, 2007, did with intent to defraud knowingly make and possess a writing, to-wit: check number 217953 made payable to [REDACTED] in the amount of \$1,613.43, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.



**COUNT TEN**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the 11<sup>TH</sup> DAY OF JULY, 2007, did with intent to defraud knowingly make and possess a writing, to-wit: check number 217950 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

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**COUNT ELEVEN**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the 11<sup>TH</sup> DAY OF JUNE, 2007, did with intent to defraud knowingly make and possess a writing, to-wit: check number 217385 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

**COUNT TWELVE**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the 11<sup>TH</sup> DAY OF JUNE, 2007, did with intent to defraud knowingly make and possess a writing, to-wit: check number 217384 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

**COUNT THIRTEEN**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the 11<sup>TH</sup> DAY OF JUNE, 2007, did with intent to defraud knowingly make and possess a writing, to-wit: check number 217383 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

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**COUNT FOURTEEN**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **21<sup>ST</sup> DAY OF JUNE, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 217547 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

**COUNT FIFTEEN**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **21<sup>ST</sup> DAY OF JUNE, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 217546 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

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**COUNT SIXTEEN**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **21<sup>ST</sup> DAY OF JUNE, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 217545 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

**COUNT SEVENTEEN**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **21<sup>ST</sup> DAY OF JUNE, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 217544 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

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**COUNT EIGHTEEN**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the 11<sup>TH</sup> DAY OF JUNE, 2007, did with intent to defraud knowingly make and possess a writing, to-wit: check number 217377 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

**COUNT NINETEEN**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the 31<sup>ST</sup> DAY OF MAY, 2007, did with intent to defraud knowingly make and possess a writing, to-wit: check number 217217 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

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**COUNT TWENTY**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **31<sup>ST</sup> DAY OF MAY, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 217218 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

**COUNT TWENTY-ONE**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **31<sup>ST</sup> DAY OF MAY, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 217219 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

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**COUNT TWENTY-TWO**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **10<sup>TH</sup> DAY OF MAY, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 216881 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

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**COUNT TWENTY-THREE**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **10<sup>TH</sup> DAY OF MAY, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 216882 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

**COUNT TWENTY-FOUR**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **10<sup>TH</sup> DAY OF MAY, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 216883 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

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**COUNT TWENTY-FIVE**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **10<sup>TH</sup> DAY OF MAY, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 216884 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.



**COUNT TWENTY-SIX**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **20<sup>TH</sup> DAY OF APRIL, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 216537 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

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**COUNT TWENTY-SEVEN**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **20<sup>TH</sup> DAY OF APRIL, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 216539 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

**COUNT TWENTY-EIGHT**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **20<sup>TH</sup> DAY OF APRIL, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 216540 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

**COUNT TWENTY-NINE**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **20<sup>TH</sup> DAY OF APRIL, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 216534 made payable to [REDACTED] in the amount of \$1,600.00, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

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**COUNT THIRTY**

AND THE GRAND JURORS, aforesaid, in the name and on behalf of the citizens of Georgia, charge and accuse **CHARLOTTE JO BAGHOSE** with the offense of **FORGERY IN THE FIRST DEGREE**, for that the said accused in the County of Hall and the State of Georgia on the **30<sup>TH</sup> DAY OF MARCH, 2007**, did with intent to defraud knowingly make and possess a writing, to-wit: check number 45259 made payable to [REDACTED] in the amount of \$2,250.45, in such a manner that the writing as made purports to have been made by authority of one who did not give such authority and did utter said writing in violation of O.C.G.A. § 16-9-1, contrary to the laws of said State, the good order, peace and dignity thereof.

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