

EXHIBIT L

September 11, 2023

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

Re: *St. Luke's et al. v. Ammon Bundy et al.*
Violations of Permanent Injunction

Mr. Bundy:

I write regarding your continued violation of the Court's Findings of Fact, Conclusions of Law and Order for Injunctive Relief, which was issued on August 25, 2023 ("August 25 Order"), and the Court's Default Judgment Order, which was issued on August 29, 2023 ("August 29 Order"). The Court's clerk served you with these Orders on August 25 and August 29, respectfully. The Orders are enclosed.

In its orders, the Court directs you to cease posting and disseminating specific statements, to remove unlawful content from the internet, and to deactivate unlawful links. *See* August 25 Order at 36-39; August 29 Order at 3-6.

Those orders state:

Defendants must:

1. Cease posting and disseminating defamatory statements against all Plaintiffs.
2. Cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
3. Remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
4. Cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
5. Remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman.

Location
800 W. Main Street, Suite 1750
Boise, ID 83702-7714

Mailing Address
P.O. Box 2527
Boise, ID 83701-2527

Contact
p: 208.342.5000 | f: 208.343.8869
www.hollandhart.com

6. Deactivate links on other websites where Defendants or their agents posted links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

August 25 Order at 37.

Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network are PERMANENTLY ENJOINED as follows:

- a. Defendants must cease posting and disseminating defamatory statements against all Plaintiffs. Defamatory statements include:
 - i. The Infant was perfectly healthy when taken by Child Protective Services.
 - ii. St. Luke's made the Infant sick and infected the Infant with disease.
 - iii. The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's.
 - iv. St. Luke's, St. Luke's management, law enforcement, Idaho Department of Health and Welfare, the courts, and medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.
 - v. The medical providers are pedophiles who want to abuse children and engage in child trafficking.
 - vi. Idaho Department of Health and Welfare makes more money for every child it takes into Child Protective Services custody and that is why the Idaho Department of Health and Welfare kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.
 - vii. St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.
 - viii. St. Luke's reported the parents to Child Protective Services.
 - ix. Dr. Erickson threatened to file a report with Child Protective Services if the parents did not agree to the treatment plan between March 1-4, 2022.
 - x. St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated.
 - xi. The family was discriminated against because the Infant was not vaccinated.
 - xii. The parents have thousands of dollars in medical bills they have to pay based on the care provided by St. Luke's or any medical provider.
 - xiii. The parents did not consent to the medical treatment provided to the Infant.

- xiv. The Infant was released from the St. Luke's Children's Hospital and returned directly to the family due to the protesters' or Defendants' actions.
- b. Defendants must cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children.
- c. Defendants must remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children. The online locations include, but are not limited to, the following websites including their sub-pages:
<https://www.peoplesrights.org>, <https://www.votebundy.com>,
<https://www.freedomman.org>, <https://stlukesexposed.com>,
<https://www.facebook.com/SaveBabyCyrus/>,
<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>
(handle @RealABundy), <https://x.com> (handle @RealABundy),
https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG
- d. Defendants must cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
- e. Defendants must remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman. The online locations include, but are not limited to, the following websites including their sub-pages:
<https://www.peoplesrights.org>, <https://www.votebundy.com>,
<https://www.freedomman.org>, <https://stlukesexposed.com>,
<https://www.facebook.com/SaveBabyCyrus/>,
<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>
(handle @RealABundy), <https://x.com> (handle @RealABundy),
https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG
- f. Defendants must deactivate links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

August 29 Order at 3-6.

The Court warned that your failure to comply "may lead to contempt proceedings, sanctions and other legal ramifications." August 29 Order at 37. Yet as of the date of this letter, you have refused to comply.

Your unlawful conduct continues to cause daily, irreparable harm to my clients. It also harms our community and makes our communities less safe. *See August 25 Order.* Accordingly, my clients hereby demand that you cease and desist from your unlawful conduct, that you remove the unlawful content from the internet, and that you deactivate the links as mandated in the Court's orders.

A non-exhaustive list of examples of your unlawful content that must be removed and/or deactivated includes:

- https://www.peoplesrights.org/news_view/?/protest-daily-for-baby-cyrus&id=d4b882ff-aaa8-4769-bdff-0f6fd44cfc49&pg=6
- https://www.peoplesrights.org/news_view/?/cps-officers-kidnap-child-multiple-arrests-made-is-this-really-happening-in-idaho&id=d1839d85-6a65-43ad-87a6-4c47a7cd7177&pg=6
- https://www.peoplesrights.org/news_view/?/idaho-freedom-fair-pact-rally&id=4429380a-b7dc-4489-8a63-54349db36acc&pg=5
- https://www.peoplesrights.org/news_view/?/ammon-bundy-guest-on-critical-disclosure-radio-with-james-white-on-brighteon-radio&id=f4740fc5-6ad2-4c41-9a38-9e89cd481905&pg=5
- https://www.peoplesrights.org/news_view/?/call-to-action-5-minutes-stand-up-for-ammon&id=1e30207c-1636-48ba-aacc-19a20ecc84fa&pg=4
- https://www.peoplesrights.org/news_view/?/cta-ways-to-assist-our-neighbor-ammon-bundy&id=ced66bb6-280e-4a1c-9b4e-6e6b1f66e10a&pg=4
- https://www.peoplesrights.org/news_view/?/st-lukes-sues-gem-county-sheriff-while-judge-issues-warrant-for-ammon-bundy-s-arrest&id=0cec03f2-bebd-4ff6-b6e9-45001ea50921&pg=3
- https://www.peoplesrights.org/news_view/?/bundy-s-sheriff-caved-to-st-lukes-in-less-than-two-days&id=5d4194aa-df1d-4a87-acc5-5f160599969d&pg=3
- https://www.peoplesrights.org/news_view/?/dinner-at-the-bundy-s-home-this-saturday-evening&id=b2d3a8cc-5cf8-4eed-ba6b-faf8934deb7b&pg=3
- https://www.peoplesrights.org/news_view/?/big-jim-smith-interviews-ammon-bundy-on-the-nate-shelman-show&id=d5af5adc-6b2d-4221-b469-b5791aef60ba&pg=2
- https://www.peoplesrights.org/news_view/?/ammon-bundy-files-in-federal-court-to-stop-st-luke-s-abuses&id=aebe3a60-0216-460c-b858-5d913a7c3c3c&pg=2
- https://www.peoplesrights.org/news_view/?/famous-youtuber-james-freeman-promotes-prn&id=3c5d8774-1ab1-44f0-992c-53f304b9010a&pg=2
- https://www.peoplesrights.org/news_view/?/citizens-ask-sheriffs-in-idaho-counties-not-to-arrest-ammon-bundy&id=0fce917-65c8-400d-9ffe-c8dff2ffd93&pg=2
- https://www.peoplesrights.org/news_view/?/live-entire-baby-cyrus-story-presentation&id=b1a16ea9-8ffa-4013-a219-226aa0a86160&pg=2
- https://www.peoplesrights.org/news_view/?/updates-for-st-luke-s-abusive-lawsuit-against-ammon-diego-people-s-rights-etc&id=343c90a9-90ef-44a7-96c0-4d2cf40272fa&pg=2

- https://www.peoplesrights.org/news_view/?letter-to-erik-stidham-st-lukes-lead-attorney-from-ammon-bundy&id=3f51d298-daf4-4d77-b25e-9d78394dc5a1&pg=2
- https://www.peoplesrights.org/news_view/?quick-but-detailed-update-video-on-the-ammon-bundy-st-lukes-case&id=2b857012-3642-4ba5-8c7a-2711998a8275&pg=2
- https://www.peoplesrights.org/news_view/?what-you-can-and-should-do-to-assist-in-the-lawsuit&id=9bc7bf8c-73b2-48e7-b6d6-af21cbe77abb&pg=2
- https://www.peoplesrights.org/news_view/?an-open-letter-to-judge-david-nye-chief-judge-of-the-u-s-district-court-for-the-district-of-idaho&id=62a36d9d-81d0-4e24-8ea8-0db182ac826f&pg=2
- https://www.peoplesrights.org/news_view/?gem-county-sheriff-donnie-wunder-continues-to-do-the-bidding-of-ada-county&id=b3566459-4bda-48ee-9523-1d87614e0fed&pg=1
- https://www.peoplesrights.org/news_view/?letter-to-judge-baskin-from-ammon-bundy&id=1d14827d-4757-4535-b18d-64ab170dc19&pg=1
- https://www.peoplesrights.org/news_view/?st-lukes-executives-still-offering-sex-change-surgeries-on-children-in-idaho&id=1398040c-bc59-4fc9-9bac-dcc1d6c72ac8&pg=1
- https://www.peoplesrights.org/news_view/?why-appealing-the-st-luke-s-case-would-not-be-worth-it&id=944264da-ab84-4a60-b48f-fdf526fc000d&pg=1
- https://www.peoplesrights.org/news_view/?52-million-no-wonder-they-lied-to-the-jury&id=705912d3-d34c-4160-b11a-11e692e3ee19&pg=1
- https://www.peoplesrights.org/news_view/?come-no-more-upon-me-a-warning-letter-from-ammon-bundy&id=f6984a7c-eafc-4082-a3b4-e99dfe129733&pg=1
- https://www.peoplesrights.org/news_view/?ammon-is-being-held-by-gem-county-unreasonably&id=c41c5b1a-8463-4c51-bfef-3ba669a8c570&pg=1
- https://www.peoplesrights.org/news_view/?recent-letter-to-erik-stidham-lead-st-lukes-attorney-and-responses&id=8daa76ec-d798-4041-a893-2415f6e067c6&pg=1
- https://team.votebundy.com/news_view/?st-luke-s-hospital-is-suing-me-why-i-m-not-a-participant-in-court&id=7b6fc5ff-10e4-4e4f-bf81-5f104527f7dd
- https://team.votebundy.com/news_view/?was-helping-baby-cyrus-come-home-an-appropriate-thing-to-do-as-a-candidate-for-governor&id=517352db-0a74-4b1f-aa5e-d57bc5bde11c
- https://team.votebundy.com/news_view/?baby-cyrus-was-kidnapped&id=07a42730-c674-421a-a5dd-66d25464089b
- <https://www.votebundy.com/media/interviews/> (remove the defamatory interviews and links including, without limitation, those associated with the May 20th, 2022, interview with James White and the July 19 interview with Stew Peters)
- <https://twitter.com/realabundy/status/1502610950666420228?lang=en>
- <https://www.youtube.com/watch?v=MaRScsCK2l0>
- <https://www.youtube.com/watch?v=qpGQhQtwdzw>
- <https://www.youtube.com/watch?v=UdEMKA1GfyY>

- https://team.votebundy.com/news_view/?baby-cyrus-was-kidnapped&id=07a42730-c674-421a-a5dd-66d25464089b
- <https://www.youtube.com/watch?v=8sKPqfTiu-w>
- https://www.youtube.com/watch?v=q_xwlay4mbU
- <https://www.youtube.com/watch?v=QmV6R2Du5t8>
- <https://www.youtube.com/watch?v=tJo7j9CW7M>
- <https://www.youtube.com/watch?v=1FN9NBYrijY>
- <https://www.youtube.com/watch?v=gfMbo9BR2CE>
- <https://www.youtube.com/watch?v=wS2b9UR8DOM>
- https://team.votebundy.com/news_view?id=07a42730-c674-421a-a5dd-66d25464089b
- https://team.votebundy.com/news_view?/was-helping-baby-cyrus-come-home-an-appropriate-thing-to-do-as-a-candidate-for-governor&id=517352db-0a74-4b1f-aa5e-d57bc5bde11c
- https://www.youtube.com/watch?v=ZsyPhpHy_w
- <https://www.youtube.com/watch?v=jRpLVGvPzlII>
- <https://www.bitchute.com/video/GkIrvuVw27Tg/>
- https://www.youtube.com/watch?v=GgIEip6jw_g
- <https://www.youtube.com/watch?v=q8LS2-0mDJs>
- <https://rumble.com/v291keg-st.-lukes-hospital-executives-seek-7.5-million-and-my-arrest.html>
- <https://rumble.com/v291keg-st.-lukes-hospital-executives-seek-7.5-million-and-my-arrest.html?mref=9fcg3&mrefc=6>
- <https://www.youtube.com/watch?v=R6Asy1zB1oE>
- <https://www.youtube.com/watch?v=lgSRID0xGZY>
- <https://www.youtube.com/watch?v=ICrDbK8vlis&t=162s>
- https://www.youtube.com/watch?v=QI6aehYVS_g
- <https://www.youtube.com/watch?v=mPPvXTYCbnM>
- https://www.youtube.com/watch?v=NOsTYmrYC_g
- <https://twitter.com/RealABundy/status/1652055235047706629>
- <https://twitter.com/RealABundy/status/1652707762025930753>
- <https://twitter.com/RealABundy/status/1653502538652569625>
- <https://twitter.com/RealABundy/status/1654923632286613509>
- <https://www.youtube.com/watch?v=NcggtTs9AZXo>
- <https://twitter.com/RealABundy/status/1656351779125354498>
- <https://twitter.com/RealABundy/status/1657602853899214850>
- <https://www.youtube.com/watch?v=8Du-jbE022I>
- <https://www.youtube.com/watch?v=8xepv-Rr34U>
- <https://twitter.com/RealABundy/status/1660673345782677512>
- <https://www.youtube.com/watch?v=q84r718hqvA>
- <https://www.youtube.com/watch?v=ToLyf6XW7r0&t=5s>
- https://www.youtube.com/watch?v=zy_c9D5CjQQ

- <https://twitter.com/RealABundy/status/1690894901733654528>
- <https://twitter.com/RealABundy/status/1690446450533269504>
- <https://twitter.com/RealABundy/status/1689468530599903232>
- <https://twitter.com/RealABundy/status/1661028326390071296>
- <https://twitter.com/RealABundy/status/1691231540402085888>
- <https://twitter.com/RealABundy/status/1660673345782677512>
- <https://twitter.com/RealABundy/status/1690461964852740096>
- <https://twitter.com/RealABundy/status/1684765321817993216>
- <https://twitter.com/RealABundy/status/1685405333899128832>
- <https://twitter.com/RealABundy/status/1661441723535446016>
- <https://twitter.com/RealABundy/status/1662833555372662784>
- <https://twitter.com/RealABundy/status/1681401123528392705>
- <https://twitter.com/RealABundy/status/1683700789028753408>
- <https://twitter.com/RealABundy/status/1658179708767330319>
- <https://twitter.com/RealABundy/status/1655546458500628481>
- <https://twitter.com/RealABundy/status/1502858646320922625>
- <https://www.facebook.com/realammonbundy/posts/pfbid02xPR1rXrtvrjwU7QGZTjk6eXdDJb3iR4Hg5gDAoaDX7HMEETYEU2AT3Y9D9Q4FS2ql>
- <https://www.facebook.com/realammonbundy/posts/pfbid02uWm3hG8pEiB61hXuenWw4VWzUStq2m6rUwBxBxBLxoocxtQQHjk9vvnHBYY9DBuYJyl>
- <https://www.facebook.com/realammonbundy/posts/pfbid02GMVt3cSYsBeCprbDEQfpk1233fTnGpvZDnQ1dJtymSrJ9c1EnRyNQg27C5wnSyN4l>
- <https://www.facebook.com/realammonbundy/posts/pfbid02DfyvVn4P2doVp2sGS7K63j6A4Wc22g8b8ShcUWQTWAC8uEXzDyEPFxHbkw134gx1>
- <https://www.facebook.com/realammonbundy/posts/pfbid0gF3mA5fQXCYMYs648cPXCzgiCVvM8Soz3m2KbbFMUtPFUtJtAosD2jCGhuBunVkfI>
- <https://www.facebook.com/realammonbundy/posts/pfbid02nasDYD55zxrXNc81qa3rWP66q9ouKxzzZhaDrsnZQZ2FygyHmSJMMLCmrBhsm6HJl>
- <https://www.facebook.com/realammonbundy/posts/pfbid02zTmGGdwS9sojWKT3Y6EEbGhMEWd3LSPQJCg91b9PpafFoQVmkewnG11f6uda7soU1>
- <https://www.facebook.com/realammonbundy/posts/pfbid0TjM4z7oufgNLJ9SACjkWaDa8rbm1cdetEKicmmaHGBM7eKgNvnAsATnnsjPU9YzK1>
- <https://www.facebook.com/realammonbundy/videos/373815097677992/>
- <https://www.facebook.com/realammonbundy/posts/pfbid0YULaKfsX921ykKAPT3sdh18vkaTCRRueBSSAw6na1FPxdTvU7h3f7KQgExFmJzzkl>
- <https://www.facebook.com/realammonbundy/posts/pfbid02y1zwfC4J6az1Kcoj88v3TxMMdbA7iGAaA7V4hdWeZokwT7ypjsSbSi6bAEKc4eHJl>
- <https://www.facebook.com/realammonbundy/posts/pfbid0KSpg5cccgVpG84MMWsZuiJaD7EpFUa3tRYttCtGRuK1MPdcApNh18bJkLVZBsJQzl>
- <https://www.facebook.com/realammonbundy/posts/pfbid0Q5b5j9NuZPcHGWeBjV3t9cFDJWX63jXQduy6Q8frVYkTcY9boBDQhgCixvCReAaql>

- <https://www.facebook.com/realammonbundy/posts/pfbid0r7JscpqMLaiJ5qQyW9E7EGbtXQULn2ggZrA6BAB5S7wa7c95sg4k4jdyvvVSrfnql>
- <https://www.facebook.com/realammonbundy/posts/pfbid023mRqzn3AiSBDPngcUGV4YXEXJQ6WPniZ2ChooSF6ET1DtcFRFQa3Qm2izrtMm6VE1>
- <https://www.facebook.com/realammonbundy/posts/pfbid0yEn6v8G69Pk9GYncJtzbWPqqcNyYhv1bNWBSrtvmG4UzQFcc4u8PmAMtJHNEWWLPI>
- <https://www.facebook.com/realammonbundy/posts/pfbid02ucSQAZjzg838mZQJkg2i9dXcga5hfEZ8Z4c6VqM7BtPC2s2Ry6RNSPESnrS1WZCNI>
- <https://www.facebook.com/realammonbundy/posts/pfbid0oeTkuje92qJDsaUpkNyeMr3GTFhWCXFqHnnMF7tPRp1kV9xit6jRk299hsEKdol>
- <https://www.facebook.com/realammonbundy/posts/pfbid02X4eX5cnqSvbp5jpgt44CrfgqPHe3uJbHGxmomPHqhjNGFyHL3xmLFn9C52h6YxJnl>
- <https://www.facebook.com/realammonbundy/posts/pfbid024CL1qkUgYWtpvmp1XDxDzdVfGNUJddyGMz69XgKBRxizaiotP7ZJ9mKDpfomVLPRHI>
- <https://www.facebook.com/realammonbundy/posts/pfbid02FzrhG5A3ZfMwyT5WhKeB5dEfpxBuPXFBkWXxhxwwwXWUmUu54Zeh6tZpXr1B8Rsl>
- <https://www.facebook.com/realammonbundy/posts/pfbid0VNuUwTChzHgKV7F4uT28HEcCFnR7UUQEYHmBHskqXANXX96eApJeFGG3RXsdmKzFl>
- <https://www.facebook.com/realammonbundy/posts/pfbid0F4uh4QreDjhCAu7RkgrELCRxGTNyCfbFY6Gek4m4qmRmbnXoTLKDgjQ6rPWn5Ugjl>
- <https://www.facebook.com/realammonbundy/posts/pfbid02br9iDqDGqaN8knaViNeD9E8BxTq8WxjiEeTjQ332naMouEgkUQ6EP4LyrNyLLw6l>
- <https://www.facebook.com/realammonbundy/posts/pfbid0aZ8AGayA5Qg2FkJxg2XEEhaa72unM9a3kETRPUMRUVWFj5PSywURjzNogVc3QCtZ11>
- <https://www.facebook.com/realammonbundy/posts/pfbid02M9z4CR1rCxaieqLC5DvjqV5L3cWfJDVBGCBt4LOMcjWxtwoAfQdFypqqMQQ2SUPjl>
- <https://www.facebook.com/realammonbundy/posts/pfbid02psEFVqowBXpT3kY3iMmfHtrNVnEJzMft5d49Ndq55sd8p7zADvftJYTCp3j3Zsakl>
- <https://www.facebook.com/realammonbundy/posts/pfbid0kzUabD71sM5m1WMzGYzTc5CZ7pwkFW5JNjqfh2hnyeoJqZt4qLCFjSXccm2wkzvl>
- <https://www.facebook.com/realammonbundy/posts/pfbid025sCTpkZsr2gf22NV7FNLwz4xkdHR51jMizCGFf53NtrBM3kBjRfnxvbyLYLgX2MI>
- <https://www.facebook.com/realammonbundy/posts/pfbid0aoRxrNUjXzBJaPFiK6fqgBUb1QQBqKC3tecqv6J3dcmAQScE6Px93nVfaPGiEujCl>
- <https://www.facebook.com/realammonbundy/videos/423278493120502/>
- <https://www.facebook.com/realammonbundy/posts/613800624270437>
- <https://www.facebook.com/realammonbundy/videos/i-dont-think-idaho-is-a-place-for-lying-doctors-lawyers-executives-and-reporters/841977390971278/>
- <https://www.facebook.com/reel/6258862417576042>
- <https://www.facebook.com/realammonbundy/videos/evidence-that-cps-agents-meridian-police-stlukes-staff-lied-about-why-they-took-/249311444648274/>

- <https://www.facebook.com/realammonbundy/videos/i-made-it-home-on-a-10000-bond-thanks-for-all-the-prayers-i-wonder-if-they-will-/211514391571867/>
- <https://www.facebook.com/realammonbundy/videos/please-watch-this-is-why-ammon-bundy-was-arrested/293771840004545/>
- <https://www.facebook.com/realammonbundy/posts/605532995097200>
- <https://www.facebook.com/realammonbundy/videos/ammon-was-arrested-this-evening-at-his-sons-football-banquetgather-at-gem-county/1462403251217238/>
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Please comply with the Court's Permanent Injunction by September 21, 2023.

If you do not, we will pursue all available legal remedies.

This cease-and-desist letter is sent without waiver of any right or remedy available at law or equity.

Sincerely,

/s/Erik F. Stidham

Erik F. Stidham
Partner
of Holland & Hart LLP

EFS:cmc

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