WILSON SONSINI

Michael S. Casey

PARTNER

National Security

London

mcasey@wsgr.com
44-20-39634087

FOCUS AREAS

- Anti-Money Laundering
- Board and Internal Investigations
- Committee on Foreign Investment in the United States (CFIUS)
- Export Control and Sanctions
- FCPA and Anti-Corruption
- Government Investigations
- National Security
- Regulatory
- Strategic Risk and Crisis Management
- White Collar Crime

EXPERIENCE

Mike Casey is a dual-qualified, *Chambers*-ranked partner in the London office of Wilson Sonsini Goodrich & Rosati. His practice focuses on investigations and regulatory compliance matters related to economic sanctions, export controls, money laundering, corruption, and white-collar fraud. In addition, he regularly acts as a specialist in mergers, acquisitions, venture financings, lending arrangements, and other types of corporate transactions. He also frequently advises clients on the UK's National Security and Investment Act and other foreign direct investment review regimes.

Chambers UK noted that he is "a one-stop shop for global sanctions advice" and that he is "very responsive with his provision of highly commercial advice."

Mike has led numerous internal and government-initiated investigations involving potential violations of economic sanctions, anti-money laundering laws, anti-bribery laws, fraud laws, and export controls in the United States, Europe, Asia, and Central and South America. He has also represented individuals in pending and threatened litigation.

Mike regularly advises clients on a wide range of compliance issues. He works with clients to develop and implement state-of-the-art compliance programs, including corporate policies, training programs, and third-party procedures. Further, Mike assists clients with carrying out due diligence for many types of corporate transactions. He has successfully guided dozens of investors and companies through the NSI Act review process.

Prior to joining Wilson Sonsini, Mike was a partner in the London office of Kirkland & Ellis.

Mike is the author of *Sanctions Enforcement and Compliance: A Practitioner's Guide to OFAC*, a treatise published by Bloomberg BNA. Additionally, leading legal publications have published more than 45 of his articles. He has been quoted in numerous publications, including *The Wall Street Journal, The New York Times,* and *Global Investigations Review.*

CREDENTIALS

Education

- J.D., UCLA School of Law, 2007
  Order of the Coif; *Articles Editor*, Journal of International Law and Foreign Affairs
- M.Sc., International Relations, London School of Economics and Political Science, 2004
- A.B., International Politics, Dartmouth College, 2003
  With High Honors

Associations and Memberships

- Steering Committee Member, American Lawyers in London

Honors

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- Ranked Band 2 in the Sanctions category in the 2024 edition of *Chambers UK*
- Named a Global Leader for International Sanctions by *Who's Who Legal* (2019-2023)
- Recognized as a key lawyer for Regulatory Investigations and Corporate Crime in *Legal 500's* UK rankings (2021, 2022)
- Named a Distinguished Adviser by *Financier Worldwide* for International Trade & Sanctions (2021, 2022, and 2023)

Admissions

- Bar of the District of Columbia
- State Bar of New York
- Solicitor, England and Wales

MATTERS

Representative Matters

During the last decade, Mike has worked on the following matters during his time at Wilson Sonsini and other law firms.

International Risk Investigations

- Represented corporate clients in internal and OFAC-initiated investigations involving potential violations of every major U.S. sanctions program
- Represented a European-headquartered company in parallel DOJ and OFAC enforcement actions related to potential violations of North Korean and Iranian sanctions
- Represented a UK company in carrying out an internal investigation and submitting voluntary self-disclosures to government agencies regarding potential violations of UK and U.S. sanctions and export controls
- Represented a multinational company in making a voluntary self-disclosure to the UK government following discovery of UK export control violations
- Represented a UK company in conducting an investigation and submitting a voluntary self-disclosure to OFSI related to breaches of Russian sanctions
- Represented a freight forwarder company in internal and government-initiated investigations related to potential violations of multiple OFAC sanctions programs, the Export Administration Regulations, and the International Traffic in Arms Regulations
- Represented a multinational company in an OFAC-initiated investigation involving the unauthorized sale, through distributors, of millions of dollars of medical devices to Iran and Syria
- Represented a U.S.-based private equity sponsor in responding to an OFAC subpoena related to potential violations of the Venezuela sanctions regulations committed by one of its portfolio companies
- Represented a U.S.-based software company in an internal investigation and subsequent voluntary self-disclosures related to potential violations of the Export Administration Regulations and the Foreign Trade Regulations
- Represented a multinational medical device manufacturer in a DOJ/SEC investigation of potential violations of the Foreign Corrupt Practices Act
- Represented a global oil field equipment manufacturer and its private equity sponsor in an internal investigation after a whistleblower alleged that the manufacturer had provided improper gifts and entertainment to government officials in several Middle Eastern countries
- Represented a multinational company in conducting an internal investigation and in submitting a voluntary self-disclosure to the Department of Commerce related to potential violations of the Export Administration Regulations and U.S. anti-boycott regulations
- Represented a customs broker in a CBP-initiated investigation related to potential violations of U.S. customs regulations
- Represented a registered investment advisor in an investigation related to potential violations of U.S. federal anti-money laundering laws

Other Investigations

- Represented a U.S.-based pharmaceutical manufacturer in False Claims Act litigation related to allegations of Medicaid fraud that was brought by the federal government, 37 state governments, and two relators
- Represented a publicly traded company in an internal investigation after its auditor identified potential accounting fraud by its European subsidiaries
- Represented a multinational company and its private equity sponsor in an investigation into whistleblower allegations of fraud, sexual harassment, and improper dealings with Indian government officials

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- Represented an EU-based private equity sponsor in an SEC and FCA investigation stemming from whistleblower allegations of U.S. securities law violations
- Represented an Israeli company in responding to a subpoena issued by Dutch government authorities related to potential violations of securities laws
- Represented a UK investment advisor in conducting an internal investigation, and then in submitting disclosures to the UK's Financial Conduct Authority and National Crime Agency, following receipt of a whistleblower complaint alleging fraud
- Represented the Brazilian subsidiary of a U.S. company in an internal investigation after a whistleblower alleged the subsidiary engaged in fraudulent practices related to third-party suppliers
- Represented a U.S. pharmaceutical manufacturer in an internal investigation regarding potential falsification of clinical trial data

Regulatory Compliance Matters

- Regularly advise clients on their most complex sanctions issues, including jurisdictional considerations, general license applicability, sectoral and secondary sanctions assessments, and potential sanctions liability reviews
- Regularly advise corporate clients on conflict of law issues involving EU, UK, and U.S. sanctions, including the EU blocking statute
- Regularly seek licenses and interpretative guidance from U.S. and UK government authorities related to economic sanctions and export controls
- Regularly assist clients in developing anti-corruption, anti-money laundering, and sanctions compliance programs, including drafting policies and procedures, delivering compliance training, and implementing proactive monitoring protocols
- Conducted global, proactive risk assessments for multiple multinational corporations and assisted them in implementing remedial measures based on relevant findings
- Developed a compliance protocol for a global asset manager to conduct due diligence on its investments in high-risk jurisdictions

Transactional Experience

- Acted as an international risk subject matter expert in hundreds of buy- and sell-side M&A transactions for private equity sponsors and multinational corporations
- Regularly advise clients in corporate transactions on UK NSI Act issues
- Negotiated international risk provisions in dozens of credit agreements on behalf of private equity sponsors
- Regularly assist clients in making regulatory filings in the United States and the United Kingdom in connection with M&A transactions

INSIGHTS

Treatise

- Author, *Sanctions Enforcement and Compliance: A Practitioner's Guide to OFAC (3rd Edition)*, Bloomberg BNA, February 2024

Select Publications

- Co-author, "'Sanctions Are the New FCPA': The Familiar Evolution of Sanctions Enforcement," Wilson Sonsini Alert, March 30, 2023
- Co-author, "DOJ Announces New Guidance on Corporate Criminal Enforcement," Wilson Sonsini Alert, September 19, 2022
- Co-author, "Enforcement of Russian Sanctions and Export Controls is Coming," Wilson Sonsini Alert, September 6, 2022
- Co-author, "BEIS Blocks First Transaction Under the UK's National Security and Investment Act," Wilson Sonsini Alert, August 1, 2022
- Co-author, "BEIS Publishes First Annual Report Regarding the UK's National Security and Investment Act," Wilson Sonsini Alert, July 5, 2022
- Co-author with J. Aiello LeBeau, J. Hartwig, S. Heifetz, and A. Seymour, "CJEU Publishes Judgment Interpreting the EU's Blocking Regulation," Wilson Sonsini Alert, February 3, 2022
- Co-author with J. Aiello LeBeau, K. McDonough, and A. Seymour, "2021 U.S. Sanctions Year in Review," Wilson Sonsini Alert, January 13, 2022
- Co-author with J. Gruenspecht and S. Heifetz, "The UK's National Security and Investment Act Now Fully in Force," Wilson Sonsini Alert, January 4, 2022

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- Co-author with J. Davey, J. Gruenspecht, S. Heifetz, and T. Jenkins, "New Rules Will Require Beneficial Ownership Reporting to Federal Regulators by U.S. and Foreign Corporations, LLCs, and Other Legal Entities," Wilson Sonsini Alert, January 4, 2022
- "Taking a Deeper Look at the UK's Brand New National Security Regime," *Foreign Investment Watch*, October 31, 2021
- Co-author with J. Davey, J. Hartwig, S. Heifetz, and T. Jenkins, "New OFAC Guidance Raises the Stakes for Crypto Industry," Wilson Sonsini Alert, October 20, 2021
- Co-author with B. Buffier, D. Glazer, J. Gruenspecht, and S. Heifetz, "UK's National Security and Investment Act to Take Effect in January 2022," Wilson Sonsini Alert, October 19, 2021
- Co-author, "What the UK's New National Security Regime Means for Private Equity,"*Law360,* May 14, 2021
- Co-author, "UK's Updated National Security Review Definitions Will Ease Compliance Challenges,"*Law360,* March 12, 2021
- Co-author, "New National Security and Investment Bill Will Usher in New Regime for UK," *International Financial Law Review*, November 18, 2020
- Co-author, "A 1st Look at New EU Screening of Foreign Direct Investment," *Law360*, October 16, 2020
- Co-author, "How UK National Security Merger Reviews May Change Soon," *Law360*, June 4, 2020
- Co-author, "Latest UK Sanctions Breach Fine May Signal New Era," *Law360*, April 1, 2020
- Co-author, "U.S. Economic Sanctions: Across Last Year," *Money Laundering Bulletin*, March 2, 2020
- Co-author, "Sanctions Enforcement and Compliance: A Practitioner's Guide to OFAC," *411 Banking Practice Series Bloomberg BNA*, December 2019
- Co-author, "The U.S. Probe of Chinese Banks—What Counterparties Need to Know," *Bloomberg Law*, September 6, 2019
- Co-author, T. Zhang, and J. Wu, "Shifting U.S. Enforcement Priorities—Should Chinese Companies Be Worried?" *Bloomberg Law*, June 17, 2019
- Co-author, "A Review of U.S. Economic Sanctions in 2018," *Bloomberg Law: White Collar & Criminal Law*, January 11, 2019
- Co-author, "What Société Générale Tells Financial Institutions About the Future of Enforcement," *Bloomberg Law*, November 30, 2018
- Co-author, "The Challenge Iran Sanctions Pose for EU Operators," *Law360*, November 2, 2018
- Co-author, "Reform on the Horizon for the United Kingdom's National Security Regime," *Antitrust on Bloomberg Law*, August 21, 2018
- Co-author, "Extraterritorial Sanctions—Going Back to the Future?" *Corporate Disputes Magazine*, July 2018
- Co-author, "U.S. Economic Sanctions: Mid-Year Review," *Corporate on Bloomberg Law*, July 13, 2018
- Co-author, "Adding Pakistan to 'Gray List' Has Important Consequences," *Law360*, May 23, 2018
- Co-author, "How Should Chinese Companies Face Increased U.S. Enforcement Risk from Their Global Business Operations?" *China Business Law Journal,* January 31, 2018
- Co-author, "Voluntary Self-Disclosure of Sanctions Violations: Frameworks and Considerations in the US, UK (Part II)," *Corporate Counsel*, January 22, 2018
- Co-author, "Voluntary Self-Disclosure of Sanctions Violations: Frameworks and Considerations in the US, UK (Part I)," *Corporate Counsel,* January 19, 2018
- Co-author, "Sanctions Year in Review," *Bloomberg BNA's Corporate Law & Accountability Report*, December 12, 2017
- Co-author, "How Will Brexit Affect the UK Sanctions Regime?" *Financier Worldwide*, November 2017
- Co-author, "Damming Warrants: The United States' Latest Foreign Policy Tool?" *Bloomberg Law White Collar Crime Report*, October 27, 2017
- Co-author, "Sanctions Compliance Lessons from Recent OFAC Actions," *Law360*, September 13, 2017
- Co-author, "U.S. Expands Efforts to Target Corrupt Foreign Officials," *Westlaw Journal White-Collar Crime*, August 2017
- Co-author, "OFAC's Streak Continues: Takeaways from the TransTel Sanctions Settlement," *Bloomberg BNA's Corporate Law & Accountability Report*, August 4, 2017
- Co-author, "New FinCEN AML and Customer Due Diligence Regulations Await Mutual Funds," *The Investment Lawyer*, August 2017
- Co-author, "OFAC Continues to Pursue Oil and Gas Companies," *Law360*, July 21, 2017
- Co-author, "A Midyear Review of US Economic Sanctions Efforts," *Law360*, June 29, 2017
- Co-author, "Sanctions and Export Control Risks for Health Care Companies," *Law360*, May 19, 2017
- Co-author, "Export Control Enforcement in The Wake of The ZTE Resolution," *Law360*, March 10, 2017

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- Co-author, "Developments in US economic sanctions: 2016 in review," *Global Investigations Review*, January 19, 2017
- Co-author, "Important Takeaways from the National Oilwell Varco Inc. Settlement," *Bloomberg BNA's Corporate Law & Accountability Report*, January 2017
- Co-author, "Forecasting International Risk Climate Under President Trump," *Law360*, November 13, 2016
- "Recent Trends in Sanctions and AML Regulation and Enforcement," *Bloomberg Law: Banking*, October 24, 2016
- Co-author, "Six Months Since Iran Sanctions Relief: Lessons and Forecast," *Law360*, July 28, 2016
- Co-author, "Potential Traps When Doing Business in Iran," *New York Law Journal*, February 10, 2016
- Co-author, "FinCEN's Proposed AML Program & Reporting Requirement Rules," *Bloomberg BNA Securities Regulation & Law Report*, December 2015
- Co-author, "Lessons Learned from the Schlumberger Sanctions Settlement," *Bloomberg BNA's Corporate Law & Accountability Report*, April 3, 2015
- Co-author, "Takeaways from Weatherford Corruption Settlements," *Law360*, December 5, 2013
- Co-author, "OFAC Sanctions and Successor Liability," *Law360*, November 6, 2013
- Co-author, "The Perilous Sanctions Regime: Understanding ING Bank's $619M Settlement With OFAC," *Bloomberg BNA's Banking Report*, October 30, 2012
- Co-author, "Al Haramain: Analyzing the Impact of the Ninth Circuit's Recent Decision on OFAC's Jurisdiction," *Bloomberg Law Reports Corporate Counsel*, January 2012
- Co-author, "4 Steps Toward OFAC Sanctions Compliance," *Law360*, August 2011

Select Speaking Engagements

- Speaker, "Recent Developments in Sanctions Enforcement, Circumvention, and Divestment," Global Economics Sanctions Conference, Berlin, June 5, 2024
- Speaker, "A Practical Guide to Resolving Emerging U.S., EU, and UK Sanctions Compliance Challenges," Global Economics Sanctions Conference, Berlin, June 4, 2024
- Speaker, "Economic Sanctions – Anticipating and Preparing for Fresh Challenges," AMLP Forum, London, April 24, 2024
- Speaker, "Navigating Financial Sanctions: the U.S. and UK Regulatory Landscapes," Cyprus Institute of Financial Services, March 14, 2024
- Speaker, "Global Sanctions Compliance and Enforcement Considerations," New Zurich Compliance Conference, Zurich, January 18, 2024
- Interviewer, "Recent OFSI Developments," C5 Sanctions Conference, London, November 16, 2023
- Speaker, "The Future of U.S., EU, and UK Sanctions," Collas Crill Risk & Regulatory Conference, Guernsey, October 31, 2023
- Interviewee, "Key Questions Regarding U.S. and European Sanctions," Hong Kong Academy of Finance, Hong Kong, June 6, 2023
- Speaker, "Recent Trends in U.S., EU, and UK Sanctions and Foreign Direct Investment," Asian Academy of International Law, Hong Kong, June 5, 2023
- Moderator, "Special Interview with OFSI's Deputy Director," Global Forum on Economic Sanctions, Berlin, June 2, 2023
- Speaker, "The Present and Future of Russian Sanctions: Perspectives from the U.S, EU, and UK," Global Forum on Economic Sanctions, Berlin, June 1, 2023
- Speaker, "Future of Investigations," GIR Live: London Spring, London, April 27, 2023
- Speaker, "Economic Sanctions & Export Controls—Ensuring Compliance with Rapidly Changing Restrictions," 19th Annual UK AML & Financial Crime Seminar, London, April 25, 2023
- "Russia Sanctions and their Intersection with Encryption Controls," Global Encryption, Cloud & Cyber Export Controls Conference, San Francisco, March 30, 2023
- Moderator, "Anti-Corruption and Sanctions Symposium," March 9, 2023
- Speaker, "One Year Later: Are the West's Sanctions Working?" School of International Financial Services, March 8, 2023
- Speaker, "Comparing and Contrasting the U.S. and UK AML Regimes," SOAS University of London, December 13, 2022
- Speaker, "A Comprehensive Guide to Russia Sanctions," London Forum on Global Economic Sanctions, November 14, 2022
- Speaker, "Practical Guidance for Managing Sanctions Risk in Supply Chains," School of International Financial Services, October 31, 2022
- Speaker, "How Effective Are Sanctions?" Isle of Man Economic Crime & Compliance Forum, October 18, 2022
- Speaker, "Sanctions in 2022 and Beyond," School of International Financial Services, September 14, 2022
- Speaker, "An Overview of the UK's National Security and Investment Act and its Implications for Investors," Global Export Control China Summit, August 18, 2022

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- Moderator, “Multi-Jurisdictional Government Updates on U.S. and UK Russian Sanctions,” Global Economic Sanctions Forum, Berlin, June 8, 2022
- Speaker, “An In-Depth Guide to Russia Sanctions,” Global Economic Sanctions Forum, Berlin, June 7, 2022
- Speaker, “Russia, Ukraine, and Economic Sanctions,” Home Grown Club, London, May 31, 2022
- Speaker, “Tackling the New Dynamic Geopolitical Challenges of Economic Sanctions,” AMLP Forum Masterclass, London, April 27, 2022
- “Past, Present, and Future: Assessing the Current Sanctions Landscape on Both Sides of the Atlantic,” Wilson Sonsini/Taylor Wessing webinar, February 1, 2022
- Speaker, "An Inside Look at the United Kingdom's New National Security and Investment Act," Wilson Sonsini webinar, December 6, 2021
- Speaker, “UK NSIA: Looking Ahead to the New Year,” Canadian Bar Association, November 30, 2021
- Speaker, “The Sanctions Landscape and Future Trajectory,” 2021 Isle of Man Economic Crime & Compliance Forum, School of International Financial Services, November 11, 2021
- Speaker, “China - Practical Sanctions Considerations,” Global Sanctions Forum, London, September 30, 2021
- Speaker, “Managing Sanctions and Export Control Risks in the Health Care Industry,” Association of Certified Sanctions Specialists Webinar, July 1, 2021
- Speaker, “Recent Russia Sanctions Developments,” Global Sanctions Forum, London, October 24, 2020
- Speaker, “Gifts, Travel, Entertainment, and Hospitality in High-Risk Markets,” Advanced Conference on Anti-Corruption & Compliance Programs, Geneva, September 22, 2020
- Speaker, “A Year in Review and Global Enforcement Trends,” Global Economic Sanctions Forum, Berlin, September 14, 2020
- Speaker, “Deep Dive on the Russia Sanctions: Staying Compliant with Primary, Secondary, and Sectoral Sanctions Restrictions,” Global Economic Sanctions Forum, Berlin, September 9, 2020
- Speaker, “Sanctions Updates and Developments,” Isle of Mann Sanctions Forum, Isle of Mann, August 5, 2020
- Speaker, “Sanctions Update: Iran, Venezuela, and Russia,” BPP 2nd Annual Sanctions Forum, Guernsey, June 10, 2020
- Speaker, “Sanctions in an Evolving Geopolitical Environment,” BPP 2nd Annual Sanctions Forum, Guernsey, June 10, 2020
- Speaker, “Sanctions Compliance 2020 & Covid-19 – Navigating the Changing Landscape,” AMLP Forum UK AML & Financial Crime Seminar, London, June 3, 2020
- Speaker, “Practice Risk and Compliance: End of Year Round Up,” LexisNexis Webinar, London, January 31, 2020
- Speaker, “Regulatory Compliance in a Disrupted World,” Dow Jones and *The Wall Street Journal* Breakfast Briefing, London, December 12, 2019
- Speaker, “The Risks Venezuelan Sanctions Present for EU Operators,” Global Sanctions Forum, London, September 24, 2019
- Speaker, “Dealing with Russia - Current Sanctions Considerations,” Global Sanctions Forum, London, September 24, 2019
- Speaker, “Sanctions Seminar,” The Law Society, London, June 19, 2019
- Speaker, “Current Priorities and Compliance Expectations for 2019 and Beyond,” Global Economic Sanctions Forum, Berlin, May 22, 2019
- Speaker, “Fundamentals on Russia Sanctions: EU and U.S. Rules on Primary, Secondary and Sectoral Sanctions,” Global Economic Sanctions Forum, Berlin, May 21, 2019
- Speaker, “Lessons Learned from Recent AML Enforcement Actions,” 15th Annual AML & Financial Crime Seminar, London, March 25, 2019
- Speaker, “Dealing with Iran: U.S. Primary Sanctions, Secondary Sanctions, and the EU Blocking Statute,” AML, Financial Crime, and Sanctions Forum, London, January 31, 2019
- Speaker, “The EU Blocking Statute, U.S. Sanctions, and Iran: Compliance Questions and Challenges,” Global Sanctions Forum, London, October 31, 2018
- Speaker, “How to Scope, Execute, and Resolve Multi-Jurisdictional Investigations,” 12th Annual International Conference on Anti-Corruption, London, June 28, 2018
- Speaker, “Reinstating Sanctions and Strengthening Enforcement on Iran: What’s in Store for European Multinationals,” 12th Annual Exporters’ Forum on Global Economic Sanctions, Berlin, May 24, 2018
- Speaker, “Russia Sanctions: Understand Your Exposure and Mitigate Risks,” 12th Annual Exporters’ Forum on Global Economic Sanctions, Berlin, May 22, 2018
- Speaker, “Dealing with Iran,” AML, Financial Crime, and Sanctions Forum, London, January 31, 2018
- Speaker, “Preparing and Addressing a Voluntary Self-Disclosure,” C5 Economic Sanctions & Financial Crime Conference, London, November 16, 2017

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- Speaker, “Russia Sanctions from the Oil and Gas Perspective: New Risk and Compliance Expectations,” C5 Global Economic Sanctions Conference, Amsterdam, May 17, 2017
- Speaker, “International Risk Developments for Oil & Gas Companies,” Bloomberg BNA Webinar, February 15, 2017
- Speaker, “Practical Steps to Implementing FinCEN’s Proposed AML Rule for Registered Investment Advisers,” HFM Breakfast Briefing, New York, February 9, 2017
- Speaker, “Emerging Anti-Corruption Trends in Latin America,” 17th Annual Pharmaceutical and Medical Device Compliance Congress, Washington, D.C., October 19, 2016
- Speaker, “Recent Trends in Sanctions and Money Laundering Enforcement,” Chambers Seminar, New York, September 13, 2016
- Speaker, “Lessons Learned from the Schlumberger Sanctions Settlement,” Bloomberg BNA Webinar, July 20, 2015
- Speaker, “An Introduction to U.S. Economic Sanctions and Export Control Laws,” Pfizer PLACE Session, New York, November 18, 2014

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