BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against: Harshad Ratilal Shah, M.D. Physician's & Surgeon's Certificate No A 53132 Respondent.	Case No.: 800-2017-039136

DENIAL BY OPERATION OF LAW
PETITION FOR RECONSIDERATION

No action having been taken on the petition for reconsideration, filed by October 20, 2020, and the time for action having expired at 5:00 p.m. on October 23, 2020, the petition is deemed denied by operation of law.

BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against: Harshad Ratilal Shah, M.D. Physician's & Surgeon's Certificate No A 53132 Respondent.	Case No. 800-2017-039136 **ORDER GRANTING STAY** (Government Code Section 11521)

Robert W. Frank, on behalf of Respondent, Harshad Ratilal Shah, has filed a Request for Stay of execution of the Decision in this matter with an effective date of September 24, 2020, at 5:00 p.m.

Execution is stayed until October 23, 2020, at 5:00 p.m.

This stay is granted solely for the purpose of allowing the Respondent to file a Petition for Reconsideration.

DATED: September 21, 2020

William Prasifka
Executive Director
Medical Board of California

BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against: **Harshad Ratilal Shah, M.D.** **Physician's and Surgeon's Certificate No. A 53132** **Respondent.**	**Case No. 800-2017-039136**

DECISION

The attached Proposed Decision is hereby amended, pursuant to Government Code section 11517(c)(2)(C) to correct technical or minor changes that do not affect the factual or legal basis of the proposed decision. The proposed decision is amended as follows:

Page 2, paragraph 3, 2nd and 3rd line: "The license expired on March 31, 2020, and is currently in delinquent status" is changed to "The certificate is scheduled to expire on March 31, 2022."

The attached Proposed Decision is herby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on SEP 24 2020.

IT IS SO ORDERED AUG 25 2020.

MEDICAL BOARD OF CALIFORNIA

Kristina D. Lawson, J.D., Chair
Panel B

BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

HARSHAD RATILAL SHAH, M.D., Respondent

Physician's and Surgeon's Certificate No. A 53132

Case No. 800-2017-039136

OAH No. 2018100042

PROPOSED DECISION

Debra D. Nye-Perkins, Administrative Law Judge, Office of Administrative Hearings (OAH), State of California, heard this matter telephonically on June 25, 2020, pursuant to the May 28, 2020, order of OAH converting the hearing to a telephonic hearing because of concerns arising from the COVID-19 pandemic. Respondent's objection to the telephonic hearing was overruled in a June 8, 2020, order.

Karolyn M. Westfall, Deputy Attorney General, Department of Justice, Office of the Attorney General, State of California, represented complainant, Kimberly Kirchmeyer, Executive Director of the Medical Board of California (board).

Robert W. Frank, Attorney at Law, Neil, Dymott, Frank, McCabe & Hudson, represented respondent, Harshad Ratilal Shah, M.D., who was present.

Oral and documentary evidence was received. The record was closed and the matter was submitted for decision on June 25, 2020.

SUMMARY

Complainant alleged one cause for discipline of respondent's license, namely conviction of bribery of a public official in violation of 18 U.S.C. § 201(b)(1), a felony which is substantially related to the duties of a physician and surgeon. Respondent argued that while his conviction is substantially related to the duties of a physician and surgeon, he intends to challenge his conviction with a habeas corpus petition pursuant to Penal Code section 2255 and believes that revocation of his license is not an appropriate discipline. The evidence presented established that revocation of respondent's license is the only appropriate measure for public protection under these circumstances.

FACTUAL FINDINGS

Jurisdictional Matters

1. On June 1, 1994, the board issued Physician's and Surgeon's Certificate No. A 53132 to respondent, Harshad Ratilal Shah, M.D. The license expired on March 31, 2020, and is currently in delinquent status.

2. On November 14, 2017, respondent reported to the board his November 3, 2017, criminal conviction in the United States District Court for the Central District of California in Case No. 8:10-cr-00070-CJC-1 of violation of 18 U.S.C. § 201(b)(1), bribery

of a public official, a felony, through a Criminal Action Reporting Form with attached one-page letter from respondent. The letter from respondent stated in part as follows:

> With all sadness I am reporting my conviction that took place on November 3, 2017 at Central District Court of California. This conviction is not related to my medical practice, patient care or anything related to medicine.
>
> This conviction was due to my civil dispute with IRS. IRS agent was mentally defective and mentally disabled who developed doctor and patient type of relationship and took advantage of it and created massive false documents to trap me. Case of entrapment was fought; I'm expecting a reversal of conviction by ninth circuit appeal court. This was not related to my medical practice, patient care or any aspect of my medicine.
>
> Please contact me for any information.

3. On March 18, 2020, complainant filed accusation No. 800-2017-039136, alleging one cause for discipline of respondent's license, namely conviction of a crime substantially related to the qualifications, functions, or duties of a physician and surgeon. The alleged basis for the cause for discipline was respondent's November 3, 2017, criminal conviction in the United States District Court for the Central District of California in Case No. 8:10-cr-00070-CJC-1 of violation of 18 U.S.C. § 201(b)(1), bribery of a public official, a felony.

4. Respondent timely filed a notice of defense, and this hearing followed.

Respondent's Conviction and Subsequent Appeals

5. On April 7, 2010, a grand jury indictment was issued in Case No. SA CR 10-0070 in the United States District Court for the Central District of California, charging respondent with one count of violation of 18 U.S.C. § 201(b)(1), for corruptly giving $30,000 in cash on January 12, 2010, to a revenue agent for the Internal Revenue Service (IRS) who was conducting a civil audit of respondent's personal and business tax filings.

6. On November 3, 2017, as the result of a jury verdict respondent was convicted as charged of violation of 18 U.S.C. § 201(b)(1) and sentenced to the custody of the Bureau of Prisons for a term of 51 months and thereafter placed on supervised release for a period of two years with terms and conditions.

7. On April 15, 2019, the United States Court of Appeals for the Ninth Circuit issued a judgment, effective June 19, 2019, pursuant to a formal mandate issued by the United States Court of Appeals for the Ninth Circuit pursuant to Rule 41(a) of the Federal Rules of Appellate Procedure, affirming the district court's conviction of respondent after respondent raised 11 distinct challenges to his conviction on appeal.

8. On September 9, 2019, respondent filed a Petition for writ of certiorari with the United States Supreme Court seeking review of the United States Court of Appeals for the Ninth Circuit decision. On January 21, 2020, the United States Supreme Court denied the Petition for writ of certiorari.

Testimony of John David Kirby

9. John Kirby is a criminal defense attorney practicing in federal courts. Mr. Kirby testified at the hearing and the following factual findings are based on his testimony. Mr. Kirby will represent respondent for the filing of a habeas corpus petition pursuant to 28 U.S.C. § 2255 whereby respondent plans to collaterally attack his conviction on the basis that respondent was entrapped into making the bribe to the IRS agent and respondent's criminal defense attorney failed to request that an instruction be given to the jury regarding entrapment despite respondent's request for such an instruction.

10. On cross-examination Mr. Kirby admitted that he has not yet been retained by respondent but is "pending retention" to file the habeas corpus petition. He was first contacted by respondent one week prior to this hearing to represent respondent for the petition.

Respondent's Testimony

11. Respondent is 65 years old and not currently employed. He is married and his wife does not work outside of the home. Respondent is currently financially supported solely by his adult son, who is married and has a family of his own. As a result of his conviction respondent was incarcerated on November 3, 2017, and was released from prison on April 24, 2020. Respondent remains on supervised probation for the next two years.

12. Prior to his incarceration, respondent practiced as a psychiatrist in his private practice where he was the sole owner. Respondent has practiced psychiatry in California since 1994 in his private practice, and also for a period of time as an employee of Riverside County Mental Health. In 2017 respondent was working in his

private practice and had a contract with St. Mary Hospital in Long Beach to provide psychiatric consulting and provide mental health services to all indigent patients admitted to that hospital. Respondent specialized in Alzheimer's Disease and Schizoaffective Disorder Bi-Polar type. Respondent testified that if he is allowed to continue to practice, he would continue to provide mental health services to mental health patients in the Long Beach area where there is a high number of mentally ill patients. Respondent stated that during his many years of practice, he never had his hospital privileges investigated or revoked and was never the subject of a malpractice lawsuit.

13. Respondent admitted during cross examination that his underlying conviction was related to an audit with the IRS in 2009 and 2010 regarding both his personal and business tax filings. Respondent admitted that the audit involved income from his medical practice, but he stressed that the audit was "not about patient care." Respondent believes that his conviction is in no way related to his medical practice. Respondent admitted he was convicted by a jury of bribing an IRS agent, which is a felony. However, during his testimony respondent refused to admit any wrongdoing related to his conviction and asserted his Fifth Amendment rights to refuse to answer any further questions regarding the underlying circumstances of his conviction. Respondent admitted during his testimony that he wrote in an email to complainant's attorney on November 17, 2018, that he "was an innocent victim of a government conspiracy," which he characterized as "racist" and a violation of his "human rights."

14. Respondent testified that while he was in prison he read multiple articles related to the field of psychiatry to keep abreast of developments in the field. However, he did not complete any Continuing Medical Education (CME) course while in prison because of his limited outside communication. The last time respondent took

a CME course was in 2017. Since his release from prison, respondent has signed up for CME courses, including a Medical Ethics and Professionalism course to begin in August 2020. Respondent provided a document showing his enrollment in that course.

Respondent's Argument

15. Respondent argues that the accusation charges respondent with unprofessional conduct based upon his conviction, which respondent's counsel admits is substantially related to the practice of medicine. However, respondent argues that his conviction was not related to dishonest billing practices or fraudulent insurance claims which would be a more serious threat to the public. Respondent argues that while discipline of his license is warranted, revocation is not necessary and probationary terms will sufficiently protect the public. He argues that revocation would amount to unnecessary punishment under these circumstances.

Complainant's Argument

16. Complainant argues that respondent's conviction is very serious in nature and involves financial dishonesty related to his medical practice. Respondent's crime of income tax fraud related to an audit of the tax returns for his medical practice demonstrate a serious lack of honesty for which he incurred a felony conviction and prison sentence. Respondent continues to deny any wrongdoing and blames others for his conviction. Complainant argues that under these circumstances no terms of probation will provide appropriate public protection and revocation is necessary in this case.

LEGAL CONCLUSIONS

Burden and Standard of Proof

1. Complainant bears the burden of proof of establishing that the charges in the accusation and petition to revoke probation are true. (Evid. Code, § 115; 500.)

2. With respect to the accusation portion of the pleadings, the standard of proof required is "clear and convincing evidence." (*Ettinger v. Board of Medical Quality Assurance* (1982) 135 Cal.App.3d 853, 856.) The obligation to establish charges by clear and convincing evidence is a heavy burden. It requires a finding of high probability; it is evidence so clear as to leave no substantial doubt, or sufficiently strong evidence to command the unhesitating assent of every reasonable mind. (*Christian Research Institute v. Alnor* (2007) 148 Cal.App.4th 71, 84.)

Applicable Statutes

3. Business and Professions Code section 490 provides:

> (a) In addition to any other action that a board is permitted to take against a licensee, a board may suspend or revoke a license on the ground that the licensee has been convicted of a crime, if the crime is substantially related to the qualifications, functions, or duties of the business or profession for which the license was issued.
>
> (b) Notwithstanding any other provision of law, a board may exercise any authority to discipline a licensee for conviction of a crime that is independent of the authority

granted under subdivision (a) only if the crime is substantially related to the qualifications, functions, or duties of the business or profession for which the licensee's license was issued.

(c) A conviction within the meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo contendere. An action that a board is permitted to take following the establishment of a conviction may be taken when the time for appeal has elapsed, or the judgment of conviction has been affirmed on appeal, or when an order granting probation is made suspending the imposition of sentence, irrespective of a subsequent order under Section 1203.4 of the Penal Code.

(d) The Legislature hereby finds and declares that the application of this section has been made unclear by the holding in Petropoulos v. Department of Real Estate (2006) 142 Cal.App.4th 554, and that the holding in that case has placed a significant number of statutes and regulations in question, resulting in potential harm to the consumers of California from licensees who have been convicted of crimes. Therefore, the Legislature finds and declares that this section establishes an independent basis for a board to impose discipline upon a licensee, and that the amendments to this section made by Chapter 33 of the

Statutes of 2008 do not constitute a change to, but rather are declaratory of, existing law.

4. Business and Professions Code section 2227 provides:

(a) A licensee whose matter has been heard by an administrative law judge of the Medical Quality Hearing Panel as designated in Section 11371 of the Government Code, or whose default has been entered, and who is found guilty, or who has entered into a stipulation for disciplinary action with the board, may, in accordance with the provisions of this chapter:

(1) Have his or her license revoked upon order of the board.

(2) Have his or her right to practice suspended for a period not to exceed one year upon order of the board.

(3) Be placed on probation and be required to pay the costs of probation monitoring upon order of the board.

(4) Be publicly reprimanded by the board. The public reprimand may include a requirement that the licensee complete relevant educational courses approved by the board.

(5) Have any other action taken in relation to discipline as part of an order of probation, as the board or an administrative law judge may deem proper.

(b) Any matter heard pursuant to subdivision (a), except for warning letters, medical review or advisory conferences, professional competency examinations, continuing education activities, and cost reimbursement associated therewith that are agreed to with the board and successfully completed by the licensee, or other matters made confidential or privileged by existing law, is deemed public, and shall be made available to the public by the board pursuant to Section 803.1.

5. Business and Professions Code section 2234 provides in relevant part:

The board shall take action against any licensee who is charged with unprofessional conduct. In addition to other provisions of this article, unprofessional conduct includes, but is not limited to, the following:

(a) Violating or attempting to violate, directly or indirectly, assisting in or abetting the violation of, or conspiring to violate any provision of this chapter.

[¶] . . . [¶]

(e) The commission of any act involving dishonesty or corruption that is substantially related to the qualifications, functions, or duties of a physician and surgeon. . . .

6. Business and Professions Code section 2236 provides:

(a) The conviction of any offense substantially related to the qualifications, functions, or duties of a physician and surgeon constitutes unprofessional conduct within the meaning of this chapter. The record of conviction shall be conclusive evidence only of the fact that the conviction occurred. . . .

7. California Code of Regulations, title 16, section 1360, provides:

For the purposes of denial, suspension or revocation of a license, certificate or permit pursuant to Division 1.5 (commencing with Section 475) of the code, a crime or act shall be considered to be substantially related to the qualifications, functions or duties of a person holding a license, certificate or permit under the Medical Practice Act if to a substantial degree it evidences present or potential unfitness of a person holding a license, certificate or permit to perform the functions authorized by the license, certificate or permit in a manner consistent with the public health, safety or welfare. Such crimes or acts shall include but not be limited to the following: Violating or attempting

to violate, directly or indirectly, or assisting in or abetting the violation of, or conspiring to violate any provision of the Medical Practice Act.

8. The primary purpose of disciplinary action is to protect the public. (Bus. & Prof. Code, § 2229, subd. (a).) The Medical Practice Act emphasizes that the board should "seek out those licensees who have demonstrated deficiencies in competency and then take those actions as are indicated, with priority given to those measures, including further education, restrictions from practice, or other means, that will remove those deficiencies." (Bus. & Prof. Code, § 2229, subd. (c).) However, "[w]here rehabilitation and protection are inconsistent, protection shall be paramount." (Bus. & Prof. Code, § 2229, subd. (c).)

Disciplinary Guidelines

9. California Code of Regulations, title 16, section 1361, provides that when reaching a decision on a disciplinary action, the board must consider and apply the "Manual of Model Disciplinary Orders and Disciplinary Guidelines" (12th Edition/2016). Under the Guidelines the board expects that, absent mitigating or other appropriate circumstances such as early acceptance of responsibility, demonstrated willingness to undertake board-ordered rehabilitation, the age of the case, and evidentiary problems, Administrative Law Judges hearing cases on behalf of the board and proposed settlements submitted to the board will follow the guidelines, including those imposing suspensions. Any proposed decision or settlement that departs from the disciplinary guidelines shall identify the departures and the facts supporting the departure.

10. Under the Disciplinary Guidelines, the minimum discipline for a felony conviction substantially related to the functions of a physician and surgeon but not arising from or occurring during patient care, treatment, management or billing is a stayed revocation for seven years. The maximum discipline is revocation. Among the conditions of probation, the guidelines recommend a suspension of 30 days or more, community service, professionalism program, psychiatric evaluation, medical evaluation and treatment, monitoring-practice/billing (if dishonesty or conviction of a financial crime), and victim restitution.

Cause Exists for Discipline

11. Cause exists under Business and Professions Code section 2227, 2234, and 2236 to impose discipline. Complainant established by clear and convincing evidence that respondent was convicted on or about November 3, 2017, of the felony offense of bribery of a public official in violation of 18 U.S.C. §201(b)(1). Respondent's conviction is substantially related to the qualifications, functions or duties of a physician and surgeon. Respondent's conviction involves dishonesty and financial malfeasance. Honesty is the cornerstone of the physician-patient relationship, and respondent's conviction is substantially related to the practice of medicine.

Evaluation

12. Respondent's conviction is substantially related to the qualifications, functions or duties of a physician and evidences present or potential unfitness of respondent to practice as a physician. There is no other profession in which one passes so completely within the power and control of another as does the practice of medicine. The physician-patient relationship is built on trust and honesty. (*Shea v. Board of Medical Examiners* (1978) 81 Cal.App.3d 564, 578-579.) Respondent's felony

conviction is very serious in nature and involves dishonesty and financial malfeasance related to an audit of the income he received from his medical practice. Respondent's argument that his wrongdoing did not involve fraudulent billing of patients or insurance and therefore does not warrant revocation is without merit. Respondent continues to deny responsibility for his actions underlying his conviction and continues to blame others. Respondent has only incurred one conviction. However, respondent has been in prison or under direct supervision of correctional authorities since his conviction in November 2017. Since persons under the direct supervision of judicial or correctional authorities are required to behave in exemplary fashion, little weight is generally placed on the fact that such an individual did not commit additional crimes or continue inappropriate behavior while under supervision. (*In re Gossage* (2000) 23 Cal.4th 1080, 1099.) He was only recently released from prison on April 24, 2020, about two months prior to this hearing. Respondent remains on supervised probation for his criminal conviction for the next two years. Other than evidence that he has signed up for but not yet completed a Medical Ethics and Professionalism course, respondent has provided no evidence of rehabilitation. Under these circumstances the only appropriate discipline that will ensure public protection is revocation.

ORDER

Respondent Harshad Ratilal Shah, M.D.'s Physician's and Surgeon's Certificate, No. A 53132 is revoked.

DocuSigned by:
Debra D. Nye-Perkins
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DATE: July 21, 2020

DEBRA D. NYE-PERKINS
Administrative Law Judge
Office of Administrative Hearings

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Attorneys for Complainant

FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO July 17 20 18
BY [illegible] ANALYST

BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:	Case No. 800-2017-039136
HARSHAD RATILAL SHAH, M.D. **9648 Seville Way** **Cypress, CA 90630** **Physician's and Surgeon's Certificate No. A 53132,** Respondent.	**A C C U S A T I O N**

Complainant alleges:

PARTIES

1. Kimberly Kirchmeyer (Complainant) brings this Accusation solely in her official capacity as the Executive Director of the Medical Board of California, Department of Consumer Affairs (Board).

2. On or about June 1, 1994, the Board issued Physician's and Surgeon's Certificate No. A 53132 to Harshad Ratilal Shah, M.D. (Respondent). The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought herein and will expire on March 31, 2020, unless renewed.

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JURISDICTION

3. This Accusation is brought before the Board, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 2227 of the Code states, in pertinent part:

"(a) A licensee whose matter has been heard by an administrative law judge of the Medical Quality Hearing Panel as designated in Section 11371 of the Government Code, or whose default has been entered, and who is found guilty, or who has entered into a stipulation for disciplinary action with the board, may, in accordance with the provisions of this chapter:

"(1) Have his or her license revoked upon order of the board.

"(2) Have his or her right to practice suspended for a period not to exceed one year upon order of the board.

"(3) Be placed on probation and be required to pay the costs of probation monitoring upon order of the board.

"(4) Be publicly reprimanded by the board. The public reprimand may include a requirement that the licensee complete relevant educational courses approved by the board.

"(5) Have any other action taken in relation to discipline as part of an order of probation, as the board or an administrative law judge may deem proper.

"..."

5. Section 2234 of the Code states, in pertinent part:

"The board shall take action against any licensee who is charged with unprofessional conduct. In addition to other provisions of this article, unprofessional conduct includes, but is not limited to, the following:

"(a) Violating or attempting to violate, directly or indirectly, assisting in or abetting the violation of, or conspiring to violate any provision of this chapter.

"..."

///

6. Section 2236 of the Code states, in pertinent part:

"(a) The conviction of any offense substantially related to the qualifications, functions, or duties of a physician and surgeon constitutes unprofessional conduct within the meaning of this chapter [Chapter 5, the Medical Practice Act]. The record of conviction shall be conclusive evidence only of the fact that the conviction occurred.

"..."

FIRST CAUSE FOR DISCIPLINE

(Conviction of an Offense Substantially related to the Qualifications, Functions, or Duties of a Physician and Surgeon)

7. Respondent has subjected his Physician's and Surgeon's Certificate No. A 53132 to disciplinary action under sections 2227 and 2234, as defined by section 2236, of the Code, in that he has been convicted of an offense substantially related to the qualifications, functions, or duties of a physician and surgeon, as more particularly alleged herein.

8. On or about April 7, 2010, a Federal Grand Jury Indictment was filed against Respondent in the United States District Court, for the Central Division of California, Southern Division, in the action entitled *United States of America v. Harshad Shah*, Case No. SACR10-0070-CJC. The Indictment charged Respondent with one count of bribery of a public official, in violation of 18 U.S.C. § 201(b)(1). The Indictment generally alleged that on or about January 12, 2010, Respondent corruptly gave $30,000.00 in cash to an agent of the Internal Revenue Service, with the intent to influence an official act, in particular, a civil audit.

9. Subsequent to a finding/verdict of guilty of the charged offense of bribery of a public official, on or about November 3, 2017, Respondent was sentenced to the custody of the Bureau of Prisons for a term of 51 months, and upon release from imprisonment, Respondent was ordered to be placed on supervised release for a term of two years, subject to various terms and conditions.

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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Medical Board of California issue a decision:

1. Revoking or suspending Physician's and Surgeon's Certificate No. A 53132, issued to Respondent, Harshad Ratilal Shah, M.D.;

2. Revoking, suspending or denying approval of Respondent, Harshad Ratilal Shah, M.D.'s authority to supervise physician assistants and advanced practice nurses;

3. Ordering Respondent Harshad Ratilal Shah, M.D., if placed on probation, to pay the Board the costs of probation monitoring; and

4. Taking such other and further action as deemed necessary and proper.

DATED: July 17, 2018

KIMBERLY KIRCHMEYER
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant

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