

COURT OF COMMON PLEAS
BUTLER COUNTY, OHIO

STATE OF OHIO

Plaintiff

vs.

ROBERT H. HALEY

Defendant

CASE NO. CR2026-06-0651

FILED

2026 JUN -3 AM 11:03

INDICTMENT
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MARY L. SWAIN
BUTLER COUNTY
CLERK OF COURTS-

STATE OF OHIO,
COUNTY OF BUTLER, SS:

In the Year 2026

THE JURORS OF THE GRAND JURY OF THE STATE OF OHIO, within and for the body of the County aforesaid, on their oaths, in the name and by the authority of the State of Ohio, do find and present that:

COUNT ONE

ENGAGING IN A PATTERN OF CORRUPT ACTIVITY

On or about February 20, 2020, through April 24, 2026, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did being employed by, or associated with an enterprise conduct or participate in, directly or indirectly, the affairs of the enterprise through a pattern of corrupt activity and at least one of the incidents of corrupt activity is a felony of the first, second or third degree, which constitutes the offense of ENGAGING IN A PATTERN OF CORRUPT ACTIVITY, a First Degree Felony, in violation of R.C. §2923.32(A)(1) ~ (B)(1), and against the peace and dignity of the State Of Ohio.

COUNT TWO

AGGRAVATED THEFT OF ONE MILLION FIVE HUNDRED THOUSAND DOLLARS OR MORE

On or about February 20, 2020, through April 24, 2026, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to deprive the owner of property or services, knowingly obtain or exert control over either the property or services by deception, when the value of the property or services stolen is one million five hundred thousand dollars or more, which constitutes the offense of AGGRAVATED THEFT OF ONE MILLION FIVE HUNDRED THOUSAND DOLLARS OR MORE, a First Degree Felony, in violation of R.C. §2913.02(A)(3)~(B)(2), and against the peace and dignity of the State Of Ohio.

SPECIFICATION ONE: The Grand Jurors further find and specify that Robert H. Haley has an interest in, and the State of Ohio seeks the forfeiture of, the following property: **PNC Bank Checking Account** [REDACTED] which was seized on or about 6/3/2026 at PNC Bank. The property is subject to forfeiture under ORC 2981.02(A)(1)(b) because it constitutes or is derived directly or indirectly from the proceeds of the commission of the offense charged in Count Two.

SPECIFICATION TWO: The Grand Jurors further find and specify that Robert H. Haley has an interest in, and the State of Ohio seeks the forfeiture of, the following property: **PNC Bank Checking Account** [REDACTED] which was seized on or about 6/3/2026 at PNC Bank. The property is subject to forfeiture under ORC 2981.02(A)(1)(b) because it constitutes or is derived directly or indirectly from the proceeds of the commission of the offense charged in Count Two.

SPECIFICATION THREE: The Grand Jurors further find and specify that Robert H. Haley has an interest in, and the State of Ohio seeks the forfeiture of, the following property: **PNC Bank Savings Account** [REDACTED], which was seized on or about 6/3/2026 at PNC Bank. The property is subject to forfeiture under ORC 2981.02(A)(1)(b) because it constitutes or is derived directly or indirectly from the proceeds of the commission of the offense charged in Count Two.

SPECIFICATION FOUR: The Grand Jurors further find and specify that Robert H. Haley has an interest in, and the State of Ohio seeks the forfeiture of, the following property: **PNC Fixed Rate CD Account** [REDACTED] which was seized on or about 6/3/2026 at PNC Bank. The property is subject to forfeiture under ORC 2981.02(A)(1)(b) because it constitutes or is derived directly or indirectly from the proceeds of the commission of the offense charged in Count Two.

SPECIFICATION FIVE: The Grand Jurors further find and specify that Robert H. Haley has an interest in, and the State of Ohio seeks the forfeiture of, the following property: **PNC Fixed Rate CD Account** [REDACTED] which was seized on or about 6/3/2026 at PNC Bank. The property is subject to forfeiture under ORC 2981.02(A)(1)(b) because it constitutes or is derived directly or indirectly from the proceeds of the commission of the offense charged in Count Two.

SPECIFICATION SIX: The Grand Jurors further find and specify that Robert H. Haley has an interest in, and the State of Ohio seeks the forfeiture of, the following property: **Pruco Life Insurance Company annuity contracts held in PNC Wealth Management LLC Account** [REDACTED] which was seized on or about 6/3/2026 through Pruco Life Insurance Company and/or PNC Bank. The property is subject to forfeiture under ORC 2981.02(A)(1)(b) because it constitutes or is derived directly or indirectly from the proceeds of the commission of the offense charged in Count Two.

**COUNT THREE
MEDICAID FRAUD**

On or about February 20, 2020, through April 24, 2026, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did knowingly make or cause to be made a false or misleading statement or representation for use in obtaining reimbursement from the Ohio Medicaid Program, when the value of the property, services, or funds obtained in violation of this section is one hundred fifty thousand dollars or more, which constitutes the offense of MEDICAID FRAUD, a Third Degree Felony, in violation of R.C. §2913.40(B)~(E), and against the peace and dignity of the State Of Ohio.

**COUNT FOUR
TELECOMMUNICATIONS FRAUD**

On or about February 20, 2020, through April 24, 2026, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did having devised a scheme to defraud, knowingly disseminate, transmit, or cause to be disseminated or transmitted by means of a wire, radio, satellite, telecommunication, telecommunications device, or telecommunications service any writing, data, sign, signal, picture, sound, or image with purpose to execute or otherwise further the scheme to defraud when the value of the benefit obtained by the defendant or the detriment to the victim of the fraud is one million dollars or more, which constitutes the offense of TELECOMMUNICATIONS FRAUD, a First Degree Felony, in violation of R.C. §2913.05(A) ~ (E)(1), and against the peace and dignity of the State Of Ohio.

**COUNT FIVE
TAMPERING WITH EVIDENCE**

On or about September 11, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did knowing that an official proceeding or investigation is in progress, or is about to be or likely to be instituted, make, present, or use any record, document, or thing, knowing it to be false and with purpose to mislead a public official who was or may have been engaged in such proceeding or investigation, or with purpose to corrupt the outcome of any such proceeding or investigation, which constitutes the offense of TAMPERING WITH EVIDENCE, a Third Degree Felony, in violation of R.C. §2921.12(A)(2)~(B), and against the peace and dignity of the State Of Ohio.

**COUNT SIX
FORGERY (UTTERING)**

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for Ja.T., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

**COUNT SEVEN
FORGERY (UTTERING)**

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for Jo.T., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

**COUNT EIGHT
FORGERY (UTTERING)**

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for Q.B., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

**COUNT NINE
FORGERY (UTTERING)**

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for E.B., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

**COUNT TEN
FORGERY (UTTERING)**

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for Av.D., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

**COUNT ELEVEN
FORGERY (UTTERING)**

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for Al.D., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

COUNT TWELVE
FORGERY (UTTERING)

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he/she was facilitating a fraud, utter, or possess with purpose to utter, any writing that he/ she knew to have been forged, when the value of the property or services or the loss to the victim is one hundred fifty thousand dollars or more, To Wit: Patient File for A.S., which constitutes the offense of FORGERY (UTTERING), a Third Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(ii), and against the peace and dignity of the State Of Ohio.

COUNT THIRTEEN
FORGERY (UTTERING)

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he/she was facilitating a fraud, utter, or possess with purpose to utter, any writing that he/ she knew to have been forged, when the value of the property or services or the loss to the victim is one hundred fifty thousand dollars or more, To Wit: Patient File for F.S., which constitutes the offense of FORGERY (UTTERING), a Third Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(ii), and against the peace and dignity of the State Of Ohio.

COUNT FOURTEEN
FORGERY (UTTERING)

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he/she was facilitating a fraud, utter, or possess with purpose to utter, any writing that he/ she knew to have been forged, when the value of the property or services or the loss to the victim is one hundred fifty thousand dollars or more, To Wit: Patient File for S.S., which constitutes the offense of FORGERY (UTTERING), a Third Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(ii), and against the peace and dignity of the State Of Ohio.

COUNT FIFTEEN
FORGERY (UTTERING)

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for Kn.C., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

COUNT SIXTEEN
FORGERY (UTTERING)

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for Kr.C., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

COUNT SEVENTEEN
FORGERY (UTTERING)

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for H.C., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

COUNT EIGHTEEN
FORGERY (UTTERING)

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for F.C., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

COUNT NINETEEN
FORGERY (UTTERING)

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for M.M., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

COUNT TWENTY
FORGERY (UTTERING)

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for Ja.NW., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

COUNT TWENTY ONE
FORGERY (UTTERING)

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for JQ.NW., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

COUNT TWENTY TWO
FORGERY (UTTERING)

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for Ju.NW., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

COUNT TWENTY THREE
FORGERY (UTTERING)

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for L.S., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

**COUNT TWENTY FOUR
FORGERY (UTTERING)**

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for N.A., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

**COUNT TWENTY FIVE
FORGERY (UTTERING)**

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for J.R., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

**COUNT TWENTY SIX
FORGERY (UTTERING)**

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for A.R., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

**COUNT TWENTY SEVEN
FORGERY (UTTERING)**

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he/she was facilitating a fraud, utter, or possess with purpose to utter, any writing that he/ she knew to have been forged, when the value of the property or services or the loss to the victim is one hundred fifty thousand dollars or more, To Wit: Patient File for B.H., which constitutes the offense of FORGERY (UTTERING), a Third Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(ii), and against the peace and dignity of the State Of Ohio.

**COUNT TWENTY EIGHT
FORGERY (UTTERING)**

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he/she was facilitating a fraud, utter, or possess with purpose to utter, any writing that he/ she knew to have been forged, when the value of the property or services or the loss to the victim is one hundred fifty thousand dollars or more, To Wit: Patient File for K.T., which constitutes the offense of FORGERY (UTTERING), a Third Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(ii), and against the peace and dignity of the State Of Ohio.

COUNT TWENTY NINE
FORGERY (UTTERING)

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for C.SP., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

COUNT THIRTY
FORGERY (UTTERING)

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for Mar.H., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

COUNT THIRTY ONE
FORGERY (UTTERING)

On or about October 07, 2025, through October 10, 2025, as part of a continuing course of criminal conduct in Butler County, Ohio, Robert H. Haley did with purpose to defraud or knowing that he was facilitating a fraud, utter, or possess with purpose to utter, any writing that he knew to have been forged, when the value of the property or services or the loss to the victim is seven thousand five hundred dollars or more and is less than one hundred fifty thousand dollars, To Wit: Patient File for Mal.H., which constitutes the offense of FORGERY (UTTERING), a Fourth Degree Felony, in violation of R.C. §2913.31(A)(3)~(C)(1)(b)(i), and against the peace and dignity of the State Of Ohio.

Filed _____

Defendant arraigned, and pleads:


_____ Guilty to this indictment

By _____
MARY L. SWAIN
CLERK OF COURTS

By _____
Deputy

DAVE YOST
OHIO ATTORNEY GENERAL

BY 
BRIAN J. WALTER (0082118)
ASSISTANT OHIO ATTORNEY GENERAL

BY 
JONATHAN L. METZLER (0063508)
ASSISTANT OHIO ATTORNEY GENERAL

A TRUE BILL


FOREPERSON, GRAND JURY

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