

EXHIBIT 15

Radio-TV Cross Ownership

Sorensen Television Systems, Inc., proposed assignee of Television Station KTGM(TV), Tamuning, Guam submits the following showing in compliance with Section 73.3555(c)(2)(ii) which provides that “if at least ten independently owned media voices would remain in the market post-merger an entity can directly or indirectly own, operate, or control up to two commercial TV and four commercial radio stations (to the extent permitted by Paragraph (a) of this section, the local radio multiple ownership rule).

As background, the U.S. territory of Guam is an island of approximately 200 square miles with a 2000 U.S. Census population of 150,805 and households that total 38,769. Rex Sorensen, the majority shareholder of the proposed assignee, is the majority shareholder of Sorensen Pacific Broadcasting, Inc., licensee of Radio Stations KGUM(AM) and KZGZ(FM), Agana, Guam and KGUM-FM, Dededo, Guam.

Subsection (c)(1)(i) provides that the rule is triggered when the predicted or measured 1 mVm contour of an existing FM station encompasses the entire community of license of an proposed commonly owned TV broadcast station. Attached hereto is the contour map for KZGZ(FM) included in BPH-19900530IB (which was licensed in BLH-19920925KD) which reflects that the station’s 1 mVm contour encompasses the entire island of Guam, including the entire community of license of KTGM(TV), Tamuning, Guam.

Subsection (c)(3) provides that to determine how many media voices would remain in the market after the merger one must count independently owned and operated full power broadcast TV stations within the DMA of the TV station’s community of license that have grade B signal contour overlap with the grade B signal contour of the TV station at issue. Guam is not listed by

Nielson Media Research as being a Designated Market Area or “DMA”¹ nor is Guam an Arbitron market. However, the Commission has determined that Guam is to be treated as one single market. See Broadcast Ownership Rules, 18 FCC Rcd 3620 (2003) at Fn. 399. Following the merger, there will be two (2) independently owned and operated full-power broadcast TV stations in the Guam market; (1) KUAM-TV, Agana, licensed to Pacific Telestations, Inc. (also the licensee of KUAM(AM/-FM); and (2) KGTF-TV, Agana, licensed to Guam Educational Telecommunications, Corp.²

Further, Subsection (c)(3)(ii) provides that independently owned operating primary broadcast radio stations that are in the radio metro market of the TV station’s community of license must be counted. Following the merger there would be eight (8) independently owned operating primary broadcast radio stations in the Guam market including (1) MOY Communications, Inc., licensee of Radio Station KOKU(FM), Hagatna; (2) Inter-Island Communications, Inc., licensee of Radio Station KISH(FM), Agana; (3) Sorensen Pacific Broadcasting, Inc., licensee of Radio Stations KGUM(AM)/-FM and KZGZ(FM); (4) Catholic Educational Radio, licensee of Radio Station KOLG(FM), Agana; (5) Good News Broadcasting Corporation, licensee of Radio Station KSDA-FM, Agat; (6) Guam Educational Radio Foundation, licensee of KPRG(FM), Agana; (7) Harvest Christian Academy, licensee of Radio Station KHMG, Barrigada; and (8) KM Broadcasting of Guam, LLC, licensee of KTKB(FM), Agana³

¹ See 2004 Television Cable Factbook, p. A2337 attached.

² Both commercial and non-commercial radio and television stations are to be counted. See Television Broadcasting, 14 FCC Rcd 12903 (1999) at 12950-12951.

³ Additionally, Guam Broadcast Services, Inc. is the permittee of Radio Station KIJ(FM),
(continued...)

Subsection (c)(3)(ii) allows English language newspapers to be counted that are published at least four days a week within the TV station's DMA and that have a circulation exceeding 5 percent of the households in the DMA. At least two daily newspapers are published in Guam: "Pacific Daily News," owned by Gannett, and "Marianas Variety," owned by Younis Art Studio, Inc. (See Attached.) According to a telephone conversation between Rex W. Sorensen and the publisher of Pacific Daily News, the paper is published daily and has a circulation of 28,000 daily and 26,000 on Sunday. Similarly, according to the circulation manager of Marianas Variety, the paper is published Monday to Friday and has a circulation of approximately 5,000 daily. According to the 2000 U.S. Census, there are 38,769 total households in Guam. Therefore, each newspaper qualifies to be counted.⁴

Finally, Subsection (c)(3)(iv) provides that if cable television is generally available to households in the DMA, the cable system counts as one voice in the DMA. Marianas Cablevision (formerly Guam Cable TV) is a cable television and internet service provider in the Mariana Islands serving Guam which has 29,485 basic subscribers subscribing according to 2004 Television Cable Factbook. (See Attached.) Since there are less than 39,000 households in Guam, it would be reasonable to assume that the cable system is "generally available to households in the market".

Consequently, following the acquisition of KTGM(TV) there will be at least 13 independently owned media voices in the Guam market (See Attached List) and, therefore, the

³ (...continued)
licensed to Tumon, Guam which is not yet on the air.

⁴ Additionally, there is a heavy military presence in Guam (approximately 4,500) and the newspaper Stars and Stripes is also published there.

proposed assignment of license of Television Station KTGM complies with Section 73.3555(c) of the Commission's Rules.

GUAM INDEPENDENT MEDIA VOICES

Ownership

Frequency

Newspapers

Gannett
Younis Art Studio Inc.

Daily x 7
Daily x 5

Pacific Daily News
Marianas Variety

MCV

65 Channels

Marianas Cablevision
(incl. CNN, Fox, News,
CNBC)

Television

Pacific Telestations, Inc.
Guam Educational
Telecommunications, Corp.

#8
#12

KUAM TV (#51233)
KGTF (#25511)

Radio

Harvest Christian Academy
Guam Educational Radio
Foundation
Catholic Educational Radio
Good News Broadcasting
Corporation
MOY Communications
KM Broadcasating
Inter-Island Broadcasting

88.1
89.3
90.9
91.9
100.3
101.9
102.9

KHMG (#26384)
KPRG #25515)
KOLG (#9349)
KSDA-FM (#499)
KOKU (#25516)
KTKB (#86158)
KISH (#78492)

Sorensen Pacific Broadcasting, Inc. 567

KGUM(AM) (#60853)

Population and Housing Profile: 2000
Geography: Guam

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see the footnote below

Subject	Number	Percent	Subject	Number	Percent
SEX AND AGE			RELATIONSHIP		
Total population	154,805	100.0	Total population	154,805	100.0
Male	79,181	51.1	In households	150,928	97.5
Female	75,624	48.9	Householder	38,769	25.0
			Spouse	22,693	14.7
Under 5 years	16,785	10.8	Child	58,982	38.1
5 to 9 years	16,090	10.4	Own child under 18 years	42,353	27.4
10 to 14 years	14,281	9.2	Other relatives	24,258	15.7
15 to 19 years	12,379	8.0	Under 18 years	11,767	7.6
20 to 24 years	11,989	7.7	Nonrelatives	6,226	4.0
25 to 34 years	25,850	16.7	Unmarried partner	2,702	1.7
35 to 44 years	23,141	14.9	In group quarters	3,877	2.5
45 to 54 years	16,548	10.7	Institutionalized population	976	0.6
55 to 59 years	4,993	3.2	Noninstitutionalized population	2,901	1.9
60 to 64 years	4,534	2.9			
65 to 74 years	5,860	3.8	HOUSEHOLDS BY TYPE		
75 to 84 years	2,000	1.3	Total households	38,769	100.0
85 years and over	355	0.2	Family households (families)	32,367	83.5
			With own children under 18 years	19,678	50.8
Median age (years)	27.4	(X)	Married-couple families	22,693	58.5
			With own children under 18 years	13,964	36.0
18 years and over	99,951	64.6	Female householder, no husband present	6,284	16.2
Male	50,932	32.9	With own children under 18 years	3,753	9.7
Female	49,019	31.7	Nonfamily households	6,402	16.5
21 years and over	92,802	59.9	Householder living alone	5,082	13.1
62 years and over	10,789	7.0	Householder 65 years and over	659	1.7
65 years and over	8,215	5.3			
Male	3,953	2.6	Households with individuals under 18 years	23,346	60.2
Female	4,262	2.8	Households with individuals 65 years and over	6,247	16.1
ETHNIC ORIGIN AND RACE			Average household size	3.89	(X)
Total population	154,805	100.0	Average family size	4.27	(X)
One ethnicity or race	133,252	86.1			
Native Hawaiian and Other Pacific Islander [1]	69,039	44.6	SCHOOL ENROLLMENT		
Carolinian	123	0.1	Population 3 years and over enrolled in school	46,828	100.0
Chamorro	57,297	37.0	Nursery school, preschool	1,782	3.8
Chuukese	6,229	4.0	Kindergarten	3,134	6.7
Kosraean	292	0.2	Elementary school (grades 1-8)	23,969	51.2
Marshallese	257	0.2	High school (grades 9-12)	10,664	22.8
Palauan	2,141	1.4	College or graduate school	7,279	15.5
Pohnpeian	1,366	0.9			
Yapese	686	0.4	EDUCATIONAL ATTAINMENT		
Other Pacific Islander	648	0.4	Population 25 years and over	83,281	100.0
Asian	50,329	32.5	Less than 9 th grade	7,843	9.4
Chinese	2,707	1.7	9 th to 12 th grade, no diploma	11,862	14.2
Filipino	40,729	26.3	High school graduate (includes equivalency)	26,544	31.9
Japanese	2,086	1.3	Some college, no degree	16,611	19.9
Korean	3,816	2.5	Associate degree	3,787	4.5
Other Asian	991	0.6	Bachelor's degree	12,774	15.3
White	10,509	6.8	Graduate or professional degree	3,860	4.6
Black or African American	1,568	1.0			
Some other race or ethnic group	1,807	1.2	Percent high school graduate or higher	76.3	(X)
			Percent bachelor's degree or higher	20.0	(X)
Two or more races or ethnic groups	21,553	13.9			
Chamorro and other group(s)	7,946	5.1			
Asian and other group(s)	10,853	7.0			

1. Classification of population by race and ethnicity reflects the Office of Management and Budget, "Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity," Federal Register, Vol. 62, No. 210, October 30, 1997, pp. 58782-58790

NOTE: To maintain confidentiality, the Census Bureau applies statistical procedures that introduce some uncertainty into data for small geographic areas with small population groups. The census results in these tables contain nonsampling error, but do not contain sampling error. Data users who create their own estimates using data from these tables should cite the Census Bureau as the source of the original data only. See also the subject definitions.

- Represents zero or rounds to zero. (X) Not applicable.

Population and Housing Profile: 2000
Geography: Guam

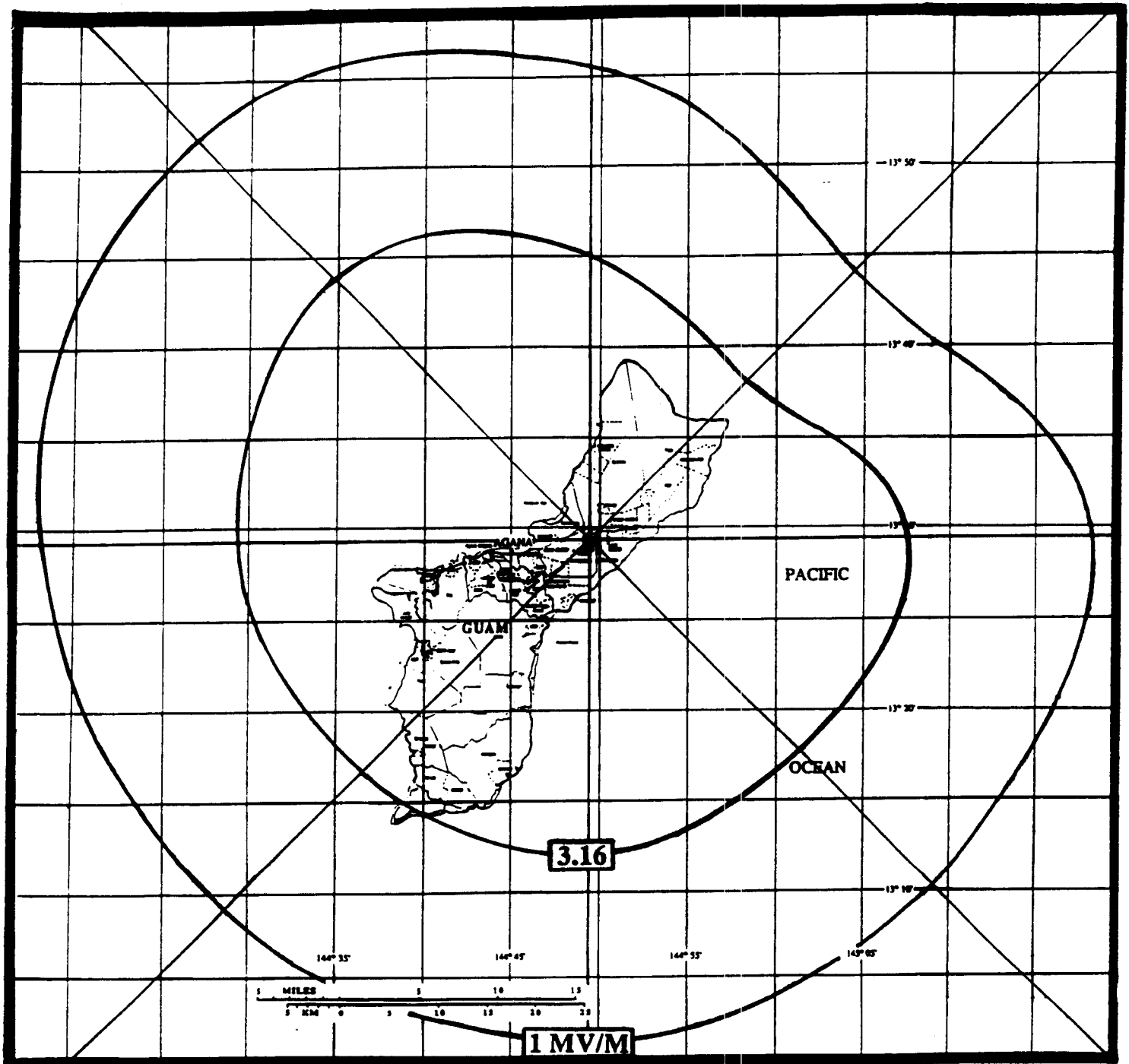
NOTE: For information on confidentiality protection, nonsampling error, and definitions, see the footnote below.

Subject	Number	Percent	Subject	Number	Percent
PLACE OF BIRTH			EMPLOYMENT STATUS		
Total population	154,805	100.0	Population 16 years and over	105,014	100.0
Born in Guam	80,737	52.2	In labor force	68,894	65.6
Born outside Guam	74,068	47.8	Civilian labor force	64,452	61.4
The Commonwealth of the Northern Mariana Islands	2,183	1.4	Employed	57,053	54.3
Federated States of Micronesia	6,983	4.5	Also did subsistence activity	4,480	4.3
Palau	1,334	0.9	Unemployed	7,399	7.0
Other Pacific Island	426	0.3	Percent of civilian labor force	11.5	(X)
Asia	42,121	27.2	Armed forces	4,442	4.2
China	2,711	1.8	Not in labor force	36,120	34.4
Japan	2,454	1.6	Subsistence activity only	2,382	2.3
Korea	3,250	2.1			
Philippines	32,625	21.1	Females 16 years and over	51,478	100.0
United States	19,096	12.3	In labor force	29,751	57.8
California	4,388	2.8	Civilian labor force	28,746	55.8
Hawaii	1,445	0.9	Employed	25,444	49.4
Elsewhere	1,925	1.2	Also did subsistence activity	1,600	3.1
			Not in labor force	21,727	42.2
			Subsistence activity only	1,125	2.2
MOTHER'S PLACE OF BIRTH					
Total population	154,805	100.0	Own children under 6 years	17,359	100.0
Born in Guam	62,804	40.6	All parents in family in labor force	9,751	56.2
Born in the United States	17,067	11.0			
Born in Puerto Rico or other U.S. Island Area	4,112	2.7	Own children 6 to 17 years	31,144	100.0
Born elsewhere	70,822	45.7	All parents in family in labor force	19,351	62.1
FATHER'S PLACE OF BIRTH					
Total population	154,805	100.0	Population 16 to 19 years	9,744	100.0
Born in Guam	59,445	38.4	Not enrolled in school and not high school graduate	1,361	14.0
Born in the United States	20,111	13.0	Unemployed or not in labor force	994	10.2
Born in Puerto Rico or other U.S. Island Area	4,081	2.6			
Born elsewhere	71,168	46.0			
			PLACE OF WORK		
			Workers 16 years and over	60,607	100.0
LANGUAGE SPOKEN AT HOME			Worked in Guam	60,335	99.6
Population 5 years and over	138,020	100.0	Same district	16,808	27.7
English only	52,831	38.3	Different district	43,527	71.8
Language other than English	85,189	61.7	Worked outside Guam	272	0.4
Speak other language					
Less frequently than English	21,114	15.3	COMMUTING TO WORK		
Equally often with English	31,503	22.8	Workers 16 years and over	60,607	100.0
More frequently than English	31,654	22.9	Car, truck, or van -- drove alone	42,327	69.8
Does not speak English	918	0.7	Car, truck, or van -- carpooled	14,087	23.2
			Public transportation	425	0.7
Chamorro	30,708	22.2	Public van/bus	278	0.5
Philippine languages	30,588	22.2	Boat	24	-
Other Pacific Island languages	9,416	6.8	Taxicab	123	0.2
Asian languages	9,624	7.0	Motorcycle	86	0.1
			Bicycle	202	0.3
			Walked	1,483	2.4
			Other means	1,208	2.0
			Worked at home	789	1.3
			Mean travel time to work (minutes)	19.2	(X)

NOTE: To maintain confidentiality, the Census Bureau applies statistical procedures that introduce some uncertainty into data for small geographic areas with small population groups. The census results in these tables contain nonsampling error, but do not contain sampling error. Data users who create their own estimates using data from these tables should cite the Census Bureau as the source of the original data only. See also the subject definitions.

- Represents zero or rounds to zero. (X) Not applicable.

KZGZ-FM



Principal Community, Agana, Completely
Encompassed by 3.16 mV/m contour

K/Z Radio Inc.
Ch. 248C2 97.5 MHZ
Agana, Guam

Application to modify
Radiation Center Height
and ERP

PROPOSED COVERAGE
40.2 KW EFFECTIVE RADIATED POWER
164M ABOVE AVERAGE TERRAIN

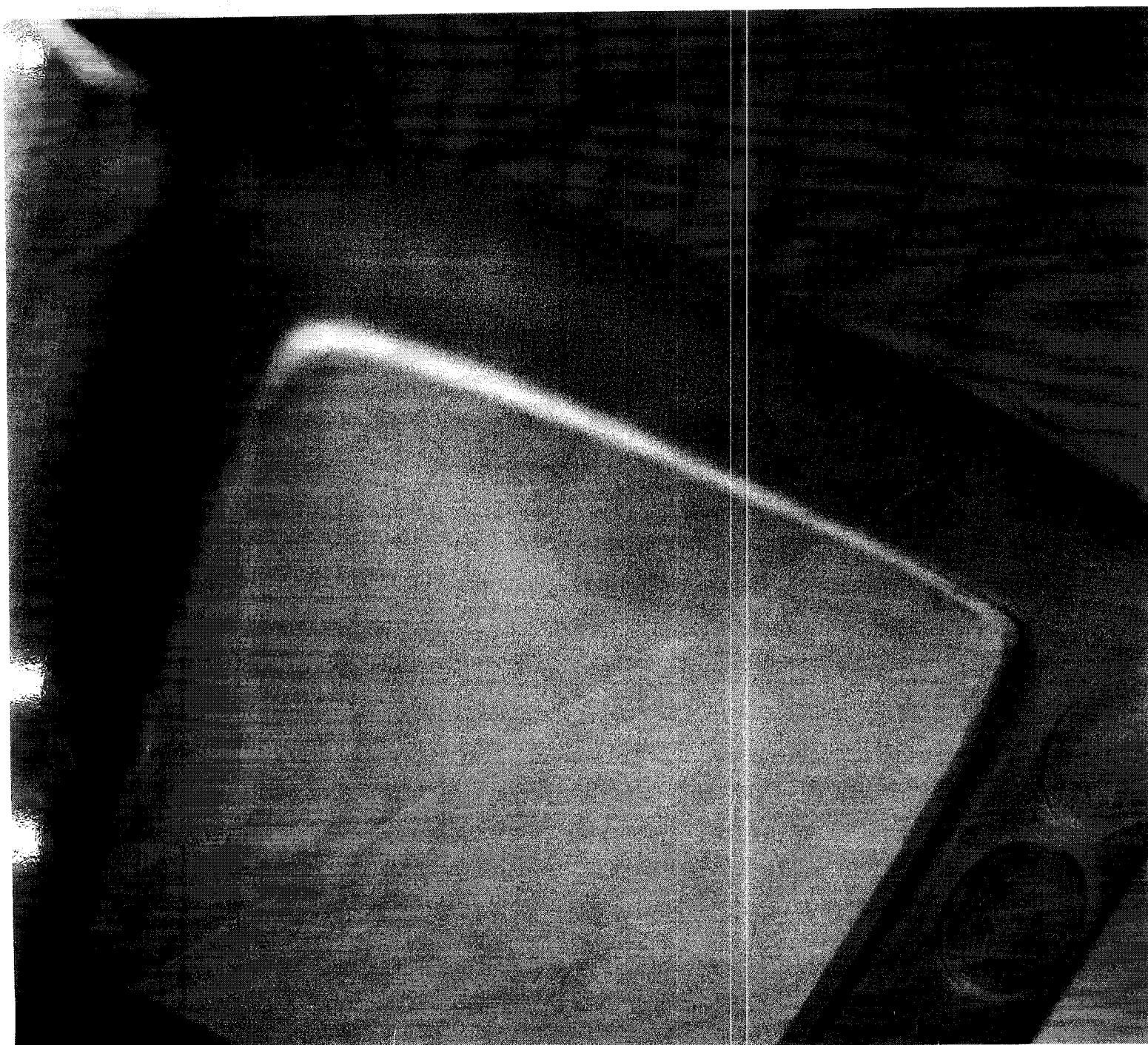
FIGURE 6B

TELEVISION & CABLE

Factbook 2004

STATIONS VOLUME 2

The Authoritative Reference for the Television, Cable and Electronics Industries



KTGM

Ch. 14

Network Service: ABC.

Licensee: Island Broadcasting Inc., 692 N. Marine Dr., Suite 308, Tamuning, GU 96911.

Studio: 692 N. Marine Dr., Suite 308, Tamuning, GU 96911.

Mailing Address: 692 N. Marine Dr., Suite 308, Tamuning, GU 96911.

Phone: 671-649-8814. **Fax:** 671-649-0371.

E-mail: abc14@ite.net

Web Site: <http://www.abc14guam.com>

Technical Facilities: Channel No. 14 (470-476 MHz). Authorized power: 12.8-kw max. visual. Antenna: 52-ft above av. terrain, 66-ft. above ground, 230-ft. above sea level.

Latitude	13°	30'	09"
Longitude	144°	48'	17"

Holds CP for change to 6.8-kw visual, 243-ft above av. terrain, 59-ft. above ground, 469-ft. above sea level; lat. 13° 29' 15", long. 144° 49' 005", BPCT-20030225AAW.

Transmitter: Atlantica Guam Corp. Bldg., Marine Dr., Upper Tumon.

Digital Facilities: Channel No. 17 (438-494 MHz). Power: 2-kw max. visual. Antenna: 52-ft above av. terrain, 66-ft. above ground, 164-ft. above sea level.

Latitude	13°	30'	09"
Longitude	144°	48'	17"

FCC Digital File Number: BPCDT-19991101ADS. Granted: February 15, 2002.

Note: Latitude and longitude coordinates shown are based on the North American Datum of 1927 (NAD 27) as currently required by the Mass Media Bureau of the FCC.

Ownership: Island Broadcasting Inc. (Group Owner).

Began Operation: October 19, 1987.

Represented (legal): Roberts & Eckard PC.

Represented (engineering): Moffet, Larson & Johnson Inc.

Personnel:

David M. Larson, General Manager.

Marie Leon Guerrero, Assistant General Manager.

Laura Balentine, Promotions Coordinator.

Ed Lee, Chief Engineer.

Joey Kawamoto, Production Manager.

Highest 30 Sec. Rate: \$250.

City of License: Tamuning. **Station DMA:** Guam. **Rank:** 0.

Nielsen Data: Not available.

Pacific Daily News

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VOL. 36 NO. 191 HAGATÑA, GUAM, AUGUST 9, 2005

HAGA ADAL, IT'S TUESDAY

guampdn.com

A Garnett Newspaper

75¢ on Guam

Per Lee We have
PUBLISHED
Giles's DA
Daily #281
Sunday #261
Priced DA

Guam P.D.N.
Pacific Daily News
GUAM'S *complete* SOURCE
Don't forget to vote in today's
Pacific Daily News poll. To-
day's question:

**Do you think
the CSC has
moved quickly
enough to
approve a chief
financial officer
position for the
education
department?**

Results from yesterday's
PDN poll are on Page 2.

Pacific Daily News
ON THE AIR

Guam probes lobbyist Former U.S. Attorney demoted after initial inquiry

Los Angeles Times

WASHINGTON — A U.S. grand jury in Guam opened an investigation of controversial lobbyist Jack Abramoff more than two years ago, but President Bush removed the supervising federal prosecutor, and the probe ended soon after. The previously undis-

closed Guam inquiry is separate from a federal grand jury in the District of Columbia that is investigating allegations that Abramoff bilked Indian tribes out of millions of dollars.

In Guam, investigators were looking into Abramoff's secret arrangement with Superior Court officials to lobby against a court reform bill

▶ TO THE POINT

▲ Controversial lobbyist Jack Abramoff has been the subject of a federal grand jury on Guam and in Washington, D.C.

then pending in Congress. The legislation, since approved, gave the Guam

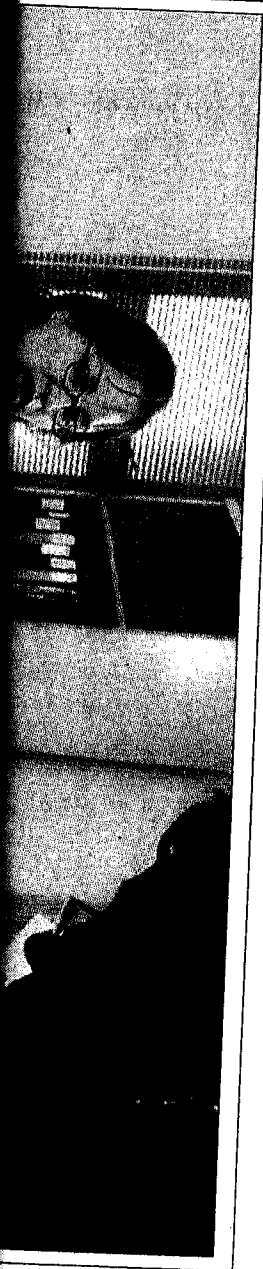
Supreme Court authority over the Superior Court.

In 2002, Abramoff was retained by the Superior Court in what was an unusual arrangement for a public agency. The Los Angeles Times reported in May that Abramoff was paid with a series of \$9,000 checks funneled through a Laguna Beach, Calif., lawyer to dis-

guise the lobbyist's role working for the Guam court. No separate contract was authorized for Abramoff's work.

Guam court officials have never explained the contractual arrangement. At the time, Abramoff was a well-known lobbying figure in the Pacific

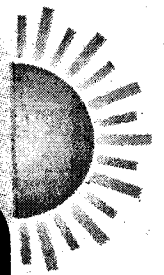
▶ See Abramoff, Page 4



**Gas
prices**

SECRET - 84

Marianas Variety



The Local & Regional Newspaper

Vol. 01 No. 224
©2005 Marianas Variety

Tuesday • August 9, 2005

www.mvariety.com
Serving the Marianas for 32 Years

50¢



Per telce with
Marianas Variety
Anthony
Press Day 7.000
Pamela
Friday

4 JAL flights canceled

By Jude O. Marfil
Variety News Staff

SAIPAN — Hundreds of Japan Airlines passengers were stranded at the Kansai International Airport after a Federal Aviation Administration equipment broke down at Saipan's airport.

"Flight 949 from Osaka, which was supposed to arrive at Saipan International Airport at 2:25 a.m. Tuesday was delayed by 11 hours. About 174 were affected," said Kunio

Continued on page 2

Gasoline prices
up again

Congressional delegation arrives today

By Gerardo R. Partido
Variety News Staff

AN official congressional delegation led by the chairman of the House Small Business Committee will be stopping over on Guam today to meet with the governor, military officials and members of the business community.

Cong. Don Manzullo (R-IL), chair of the Small Business Committee, and his vice chairman, Cong. Adam Schiff (D-CA), along with other members of the delegation, will be accompanied by Congresswoman Madeleine Z.

Bordallo.

The delegation is expected to arrive at 3 p.m. today with Gov. Felix P. Camacho giving the welcoming remarks at the airport.

Later, Bordallo will be holding a reception at the Hilton Guam Resort and Spa where they are expected to meet with community leaders.

The members of the congressional delegation are expected to discuss with local business leaders the recent passage of a new multi-billion federal transportation bill that contains a separate provision



Don Manzullo

classifying the entire island of Guam as a Historically Underutilized Business Zone. Bordallo, who lobbied

strongly for this piece of legislation, said the creation of a HUBZone for the entire island of Guam will be a boon to small businesses and boost the island's economy.

She said the designation of the whole Guam as a HUBZone will provide small businesses on the island with access to federal contracting dollars that can be used for commercial growth and economic development.

Representatives from the Guam Chamber of Commerce, the Guam Contractors Association

Continued on page 2

Back to school



GUAM

al Systems:	1	Communities with Applications:	0
al Communities Served:	1	Number of Basic Subscribers:	29,485
franchises Not Yet Operating:	0	Number of Expanded Basic Subscribers:	0
Applications Pending:	0	Number of Pay Units:	2,631

100 Markets Represented: N.A.

For a list of cable communities in this section, see the Cable Community Index located in the back of Cable Volume 2.
For explanation of terms used in cable system listings, see p. D-7.

ANA—Guam Cable TV, 530 W. O'Brien
Agana, GU 96910. Phone: 671-477-
15. Fax: 671-477-7847. County: Guam.
A: GU0001.
Market Ranking: Below 100 (AGANA).
Franchise award date: N.A. Franchise expi-
ration date: N.A. Began: October 1, 1970.
Channel capacity: 69 (2-way capable). Chan-
nels available but not in use: 4.

Basic Service

Subscribers: 29,485.
Programming (received off-air): KGTF
(PBS) Agana; KTGM (ABC) Tamuning;
KUAM-TV (NBC) Agana; allband FM.
Programming (via satellite): ABC Family
Channel; Arts & Entertainment; Bravo; Car-
toon Network; CNBC; CNN; Comedy Cen-
tral; Country Music TV; C-SPAN; Discov-
ery Channel; ESPN; ESPN 2; Eternal Word
TV Network; Food Network; History Chan-
nel; INSP; International Channel; Learning
Channel; Lifetime; MTV; Nickelodeon; Sci-

Fi Channel; Turner Network TV; USA Cable;
VH1; Weather Channel.
Fee: \$31.95 installation; \$28.95 monthly;
\$4.95 converter; \$16.95 additional in-
stallation.

Pay Service 1

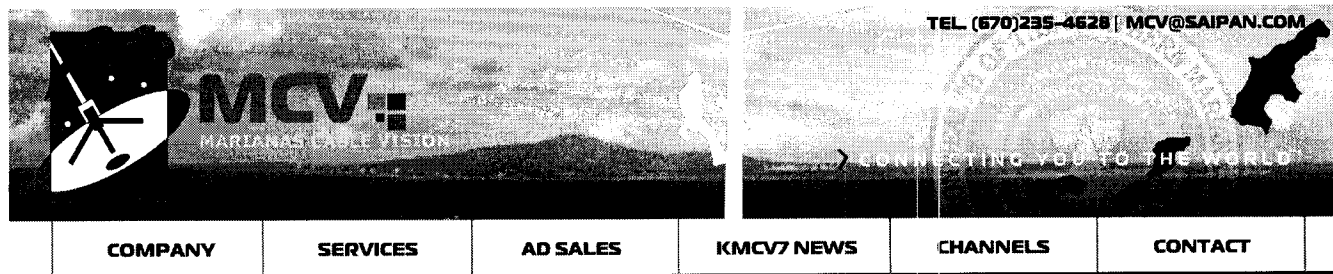
Pay Units: 2,631.
Programming (via satellite): Cine max; Dis-
ney Channel; HBO; Showtime; The Movie
Channel.
Fee: \$8.95 monthly (Disney), \$11.95
monthly (Cinemax or TMC), \$12.95
monthly (HBO or Showtime).

Pay-Per-View

Hot Choice; iN DEMAND; special events.

Internet Service

Operational: No.
Miles of Plant: 709.0 (coaxial); 97.0 (fiber op-
tic). Homes passed: 53,043.
Manager: Harrison Flora. Chief technician:
Gary McEachern. Program & marketing di-
rector: Ernie Galito.
Territory fee: 4% of gross.
Ownership: Joan S. & Lee M. Holmes (MSO).



WELCOME!




Marianas CableVision is a cable television and internet service provider in the Mariana Islands, serving Saipan, Tinian, Rota & Guam. Subscribers can choose from a multitude of television channels from the U.S. Mainland, and the Pacific Rim.

We have several cable and internet packages you can choose from to tailor your needs. We are dedicated to serve the community with the best possible cable and internet services



GET MORE INFO
ON HIGH SPEED
INTERNET



GET THE FASTEST INTERNET ON ISLAND!

SETUP FEE:
\$99.95

**YOUR FIRST MONTH
OF INTERNET IS FREE!**

CALL: 235-4MCV

Tagamail

Check your MCV/Saipan.Com email from anywhere in the world!

Username:

Password:

OFFICE HOURS:

Mon. - Fri.	8am - 6pm
Saturday	8am - 12 noon
Sun. & Hol.	CLOSED

CONTACT INFO.:

Customer Service:	235-4MCV
Ad Sales:	235-6371
Internet Support:	235-3282
Office Fax:	235-0965

[COMPANY](#) | [SERVICES](#) | [AD SALES](#) | [KMCV NEWS](#) | [CHANNELS](#) | [CONTACT](#)

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