

Public comment from E. Mohammad

From: Tamim Mohammad <tamimmohammad@gmail.com>

Sent: Monday, November 17, 2025 8:58 AM

To: BHSOAC Public Comment <publiccomment@bhsoac.ca.gov>; Mayra Alvarez <mayra.alvarez@bhsoac.ca.gov>; Brenda Grealish <brenda.grealish@bhsoac.ca.gov>

Cc: Amy Vang <amy.vang@bhsoac.ca.gov>; Amariani Martinez <amariani.martinez@bhsoac.ca.gov>; Krsangi Knickerbocker <krsangi.knickerbocker@bhsoac.ca.gov>; Sandra Gallardo <Sandra.Gallardo@bhsoac.ca.gov>

Subject: Public Comment – ADA Title II Record Continuity and Provenance Recognition (November 20 2025 Meeting – Agenda Items 3, 8, and 15) and Prior Commission Correspondence (October 2025)

Re: Public Comment – ADA Title II Record Continuity and Provenance Recognition (November 20 2025 Meeting – Agenda Items 3, 8, and 15) and Prior Commission Correspondence (October 2025)

Dear Chair Alvarez, Executive Director Grealish, and Commissioners,

Please docket this correspondence as written-only public comment for the November 20 2025 Commission meeting and circulate it with the agenda packet for record continuity.

This submission is made under my confirmed ADA / § 504 written-communication accommodation (CRD approval 10 / 23 / 25) and forms part of the **Unified BCCP™ / B2C3A™ Evidentiary Convergence Archive** (U.S. Copyright TXu 2-486-534).

1. Record Continuity and Cross-Reference Request

For ADA Title II record continuity, I respectfully request that my October 20 2025 public comment, titled *“Provenance Recognition and Structural Convergence – BCCP™ / B2C3A™ Frameworks,”* be cross-referenced within the record for the Innovation Partnership Fund (IPF) Working Framework agenda item (Item 8).

The submission addresses structural and linguistic convergence reflected in the IPF draft, including prevention, integration, and equity constructs introduced under the ADA-protected BCCP™ / B2C3A™ frameworks.

Consistent with Gov. Code § 11125.1(a) and ADA Title II effective-communication standards, this cross-reference ensures the record accurately captures the comment’s substantive relation to the IPF item and preserves provenance within the Commission’s administrative history.

2. Continuity of Prior Exhibits

Please confirm that Exhibits Q-T1 and Q-T2, submitted October 20 2025 for the cancelled October 23 meeting, are formally logged and transferred to the November 20 record. These exhibits document continuity of Commission language and governance framing following the April 2025 public-record entry of the BCCP™ / B2C3A™ frameworks.

3. Agenda Item 8 – Innovation Partnership Fund (Action)

The IPF Working Framework incorporates analytic and structural elements first entered into the public record through the ADA-protected BCCP™ and B2C3A™ frameworks, including *prevention infrastructure, continuum of care, integration, and equity-centered design*.

To preserve provenance and authorship fidelity, I respectfully request that the Commission:

- Cross-reference my October 20, 2025 public comment within the IPF record
- Annotate the meeting minutes to note alignment with the BCCP™ / B2C3A™ frameworks (TXu 2-486-534)

A detailed comparative analysis (Exhibit Q-33A – Convergence Matrix) accompanies this comment and documents direct structural, linguistic, and thematic convergence between the IPF Working Framework and the ADA-protected BCCP™ / B2C3A™ frameworks (TXu 2-486-534). This exhibit is maintained within the Unified BCCP™ / B2C3A™ Evidentiary Convergence Archive and is available for review upon lawful written request by authorized oversight, investigatory, or compliance bodies under applicable ADA Title II, FEHA, and state-records provisions.

4. Agenda Item 15 – Mental Health Wellness Act / Crisis Continuum (Information)

The Crisis Continuum presentation continues the prevention-to-custody-to-care systems logic first detailed in the BCCP™ / B2C3A™ frameworks.

For record integrity, please acknowledge analytic and linguistic convergence between these materials and the ADA-protected frameworks already entered into the Commission's record.

Additional Record Cross-Reference

For contextual completeness, please also incorporate **Exhibit Q-24 (Cross-Temporal Convergence Note – QA Control Re-Emergence and Licensure Modernization, October 15 2025)** by reference.

This exhibit, previously filed under **CRD Case No. 202503-28458711**, documents the systemic evolution of quality-assurance authority and the corresponding ADA-protected authorship continuity described in the BCCP™ / B2C3A™ frameworks.

A copy is maintained within the Unified BCCP™ / B2C3A™ Evidentiary Convergence Archive and will be provided upon lawful written request.

5. ADA Record Integrity and Public Access

Please confirm in writing that:

- My October 20 and October 29–30 filings are logged and cross-referenced to relevant agenda items.
- Exhibits Q-T1 and Q-T2 are included in the November 20 record.
- All future IPF and Crisis Continuum materials will remain publicly accessible in ADA-remediated form.
- Written-only correspondence continues to satisfy my ADA / § 504 accommodation requirements.
- Incorporate by reference Exhibit Q-24 (Cross-Temporal Convergence Note – QA Control Re-Emergence and Licensure Modernization, October 15 2025) as a contextual state-level record filed under CRD Case No. 202503-28458711.

These confirmations are requested to ensure compliance with Gov. Code § 11125.1(a) (record accuracy), Title II of the Americans with Disabilities Act (28 C.F.R. § 35.160) (effective communication), and Gov. Code § 11135 (nondiscrimination in state-conducted programs).

Consistent with prior filings, a courtesy copy of this correspondence and Exhibit Q-33A will be provided to the California State Auditor, Civil Rights Department, and DHCS Office of Civil Rights for continuity of oversight.

Transparent docket management, accessible communication, and provenance-accurate attribution are integral to lawful behavioral-health governance. Incorporating the October and November filings—**Exhibits Q-T1 through Q-33A**—and the requested cross-references within the Innovation Partnership Fund and Crisis Continuum agenda items will demonstrate the Commission’s commitment to accessibility, ethics, and public trust.

Attachments

Exhibit Q-T1 – *Continuity Record (February–October 2025).*

Documents linguistic and structural continuity across Commission proceedings following the initial BCCP™ / B2C3A™ record entry.

Exhibit Q-T2 – *Governance Convergence Table (October 2025).*

Maps administrative and thematic alignment between Commission governance materials and the ADA-protected BCCP™ / B2C3A™ frameworks.

Exhibit Q-24 – *Cross-Temporal Convergence Note (QA Control Re-Emergence and Licensure Modernization, October 15 2025).*

Establishes contextual state-level evidence of ADA-protected authorship continuity and quality-

assurance governance evolution.

Previously filed under **CRD Case No. 202503-28458711** and maintained within the **Unified BCCP™ / B2C3A™ Evidentiary Convergence Archive**. Available for review upon lawful written request by authorized oversight or compliance entities.

Exhibit Q-33A – *Innovation Partnership Fund (IPF) Convergence Matrix (November 2025)*.

Provides a detailed comparative analysis of structural, linguistic, and thematic parallels between the IPF Working Framework and the ADA-protected BCCP™ / B2C3A™ frameworks (TXu 2-486-534).

This exhibit is maintained within the Unified BCCP™ / B2C3A™ Evidentiary Convergence Archive and is available for review upon lawful written request by authorized oversight, investigatory, or compliance bodies under applicable ADA Title II, FEHA, and state-records provisions.

Respectfully submitted,

Dr. Esroruleh T. Mohammad, Ph.D.

Clinical Psychologist (on ADA medical leave)

Systems Equity Strategist & Family Advocate

Author, BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and B2C3A™ Frameworks

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Submitted in accordance with confirmed ADA Title II / § 504 written-communication accommodation (CRD approval 10 / 23 / 25).

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This filing preserves authorship provenance for ongoing intellectual-property and ADA Title II compliance review. Inclusion in the public record does not constitute waiver of copyright or accommodation-protected interests.

EXHIBIT Q-T1

Continuity and Provenance Timeline

January 2022 – October 2025

Behavioral Health Systems Transformation Record

Recognition-Only Submission under ADA Title II and Bagley-Keene Act (Gov. Code § 11120 et seq.)

Submitted to:

Behavioral Health Services Oversight & Accountability Commission (BHSOAC)

Prepared by:

Dr. Esroruleh T. Mohammad, Ph.D.

Clinical Psychologist (on ADA Medical Leave)

Systems Equity Strategist | CARE Court Petitioner

Author, BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and B2C3A™ Frameworks

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Note on Identifications

All individuals referenced in this document are identified solely in their official capacities as public officials or agency representatives. No private, personal, or non-public information is included. All events and quotations are drawn from verifiable public-record sources, including official minutes, meeting recordings, or agency correspondence.

Recognition-Only Disclosure

This exhibit is submitted exclusively to preserve factual continuity, authorship provenance, and ADA Title II participation compliance. It discloses no operational methods, trade secrets, or proprietary implementation materials and is intended solely for lawful archival and transparency purposes.

Purpose of Exhibit

This exhibit documents verifiable, date-specific events establishing continuity of disclosure, authorship provenance, and systemic convergence between January 2022 and October 2025. It is submitted for recognition only—no operational tools or proprietary implementation methods are disclosed.

Supplemental Context:

Complements Exhibits Q-24 through Q-26 by providing the factual sequence of disclosures, institutional meetings, and public proceedings forming the evidentiary foundation for provenance recognition of the BCCP™ / B2C3A™ frameworks.

Scope and Status:

Covers key meetings, submissions, and public statements involving the Behavioral Health Services Oversight & Accountability Commission (BHSOAC), Los Angeles County Department of Mental Health (DMH), and affiliated oversight bodies. Recognition-only filing under the

Recognition-only submission; no methods disclosed; no license granted. ADA/Lived Experience noted.

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Bagley-Keene Open Meeting Act and Title II ADA participation standards. All events are verifiable through public minutes, official correspondence, or recordings.

Continuity and Provenance Timeline

Date	Event / Forum	Participants / Officials	Relevance to Provenance or ADA Record
Jan 13 2022	PEI Program meeting on ethical data collection and quality assurance	Keri Pesanti (PEI Head); Wendy Tovey (District Chief); Melodie Shaw (SEIU); Dr. Mohammad	Clarified ethical-practice concerns and data standards; established record of professional diligence preceding later ADA/IPM activity.
Apr & Nov 2022	ADA Interactive Process Meetings requested and denied	DMH HR and Prevention Bureau Mgmt (Robert Byrd, Kachana Tate)	Documented early ADA/FEHA requests rejected; began displacement trajectory later confirmed in 2025 IPM.
May 31 2022	ADA-protected meeting during medical leave	Dr. Keyondra Bunch (MHSOAC / LACDMH)	Discussed workforce-equity and ethics issues; sets baseline for ADA context.
Oct 2023	High-Risk Pediatric Case – Village Family Services	PM III Anthony Alvarado; Dr. Curley Bonds (Medical Director); Village Family Services clinicians; DCFS/FFA team; Dr. Mohammad	Interdisciplinary consults on trauma pharmacotherapy and safety coordination; documented recommendation for cross-system clinical review and risk mitigation; establishes early authorship of Safety-First and interdisciplinary-continuum concepts.
Oct 12 2023	Direct Consultation with DMH Director Dr. Lisa Wong (AAMH Conference Follow-Up)	Dr. Mohammad; Dr. Wong	Email correspondence on network adequacy and culturally competent care; demonstrates executive-level engagement and alignment with later system-equity framework logic.
Jan 2024	Child fatality under County care	LACDMH / County agencies	Sentinel event prompting child-suicide postvention advocacy and systemic reform proposals.
Apr 3 & May 28 2024	Meetings with Chair Mayra Alvarez (MHSOAC / Children’s Partnership)	Dr. Mohammad; Chair Alvarez	Discussed postvention and systemic equity. Chair Alvarez stated intent to consult Kim Lewis (NHeLP) but no follow-up occurred. After lack of response, Dr. Mohammad independently initiated contact with Kim Lewis to ensure continuity of oversight dialogue.
Jul 25 2024	Consultation with Kim Lewis, J.D.,	Dr. Mohammad; Kim Lewis	One-hour consultation on emerging components of the BCCP™ framework

Date	Event / Forum	Participants / Officials	Relevance to Provenance or ADA Record
	National Health Law Program		and equity implications in behavioral health governance. Ms. Lewis engaged in substantive discussion and noted key elements during the meeting. The finalized and copyrighted framework (April 2025) was later provided for informational review, with receipt acknowledged on May 13 2025.
Jan 21 2025	ADA Interactive Process Meeting (IPM)	DMH HR Mgr Stanley Yen; SEIU Rep. Melodie Shaw, CMMD Mgr Bill Tanner	Documented reassignment from clinical to clerical duties; origin of framework constructs on fragmentation and accountability.
Apr 3–4 2025	Correspondence to DMH Director Dr. Lisa Wong	Dr. Mohammad; Dr. Wong & Chief of Staff	Outlined uncredited integration of BCCP™ concepts across DMH programs; acknowledged by Director. Attended as displaced County clinical psychologist on ADA medical leave and CARE Court petitioner. Submitted written statement after technical disruption. Statement documented structural exclusion and noted prior extraction of BCCP™-aligned oversight concepts during “consultative” interviews conducted by CARE Court leadership in December 2023 and Sept–Nov 2024. Highlighted ADA access barriers, trauma-informed redesign needs, and equity-centered accountability. Elements of this statement later appeared in County and State leadership language; coincided with announcement of the \$4B systemic child abuse settlement.
Apr 4 2025	CARE Court Town Hall and L.A. County Behavioral Health Commission	Dr. Mohammad	
Apr 10 2025	Formal public record entry of BCCP™ / B2C3A™ Frameworks	Behavioral Health Commission	Recorded introduction and distribution of materials; basis for U.S. Copyright TXu 2-486-534.
Apr 16 2025	DMH PPSGC Meeting	Dr. Lisa Wong	Confirmed departmental awareness of BCCP™ content (“ <i>Proposition 1 removes prevention completely</i> ”).
Apr & Nov	Conflict of Interest – Licensed Leadership (Deputy Director);	Dr. Robert Byrd	Byrd denied ADA/FEHA grievances then co-signed \$50M contracts derived

Date	Event / Forum	Participants / Officials	Relevance to Provenance or ADA Record
2025 Context		Kachana Tate (Manager)	from BCCP™/B2C3A™; illustrates licensure conflict.
Apr 24 & May 22 2025	BHSOAC public hearings	Chair Alvarez; Commissioners	Frameworks presented and discussed; entered into State record; first use of “continuum” and “infrastructure.”
May 22– 23 2025	MHSOAC contracting with Sellers Dorsey (private equity)	Commission Leadership and Sellers Dorsey	Contract deliverables mirrored BCCP™ logic; clarification request submitted 5/23/25.
May 8 2025	DMH Direct Order restricting communication	DMH Leadership	Issued same day State proceedings adopted similar language; limited ADA participation.
Jun 6 2025	MHSOAC apology letter	Commission Staff	Acknowledged omission of multiple rounds (April–May) of BCCP™ comments; issued procedural correction. County officials publicly acknowledged “40-year-old rules,” “cringe-worthy provisions,” and outdated civil-service constraints—directly mirroring the January 21 IPM disclosures on ADA process failures and governance lag. On the same date, a publicly reported child fatality in Los Angeles County (<i>Los Angeles Times</i> , Sept 11 2025) occurred amid the same structural oversight gaps, underscoring the public-safety implications of continued non- intervention. Included for historical accountability and evidentiary continuity.
Sept 10 2025	DMH HR ADA/IPM update	Mgr. Stanley Yen; DHR Asst. Director Johan Julin	
Sept 23 2025	L.A. County Board of Supervisors Session	Supervisors Solis & Barger; DHR Director Lisa Garrett; CEO Joseph Nicchitta	Confirmed clerical reclassification and equity deficits first raised in IPM.
Sept 30 2025	CEO Budget Reform Hearing	CEO Fesia Davenport; DA Nathan Hockman	Announced program-based budgeting and transparency reforms; validated BCCP™ analysis.
Oct 7 2025	Board After-Action Review	Board of Supervisors	Entered provenance and ADA- governance convergence into County record.
Oct 9 2025	L.A. County Behavioral Health	DMH Chief Deputy Director Rimmi	Senior leaders across DMH, SAPC, and CARE Court publicly advanced reform

Date	Event / Forum	Participants / Officials	Relevance to Provenance or ADA Record
	Commission Meeting	Hundal; SAPC Director Dr. Gary Tsai; CARE Court Team (Martin Jones, Dr. Sarah Church)	agendas structurally and linguistically aligned with the BCCP™ / B2C3A™ frameworks. Their statements referenced a “paradigm shift,” “cultural change,” and adoption of the Clubhouse Model; emphasized “workforce... licensed clinicians” and influencing the “licensing process at the state level”; and endorsed a “framework of relentless engagement.” These declarations collectively reaffirmed the analytic constructs first disclosed in the January 21 ADA IPM, evidencing sustained cross-agency convergence and protected framework adoption. This convergence occurred against the backdrop of the July 2025 Care Court statutory amendments expanding petitioner inclusion—reforms consistent with the framework’s principles but implemented while the original petitioner-author remained excluded from participation.
Oct 14 2025	L.A. County Board Item 19	Board of Supervisors	Authorized infrastructure grants mirroring B2C3A™ logic (“expand the continuum”; “prevention as infrastructure”).
Oct 17 2025	PERB / ERCOM / SEIU filings	Board Chair Eric R. Banks; Member Arthur A. Krantz	PERB correspondence (Response to Motion for Recusal and Disclosure) characterized portions of Dr. Mohammad’s motion as “fabricated.” Included to document procedural posture following prior provenance recognition and illustrate institutional reframing coincident with State-level authorship validation.
Oct 23 2025	BHSOAC Staff Restructuring Announcement	Commission senior leadership & research/HR hires	Public release of multiple senior positions (Research Scientist II, HR Chief, Staff Services Manager II) signals institutional resourcing in support of data-driven oversight and structural transformation aligned with the BCCP™ / B2C3A™ frameworks.

Summary Statement

The chronology demonstrates an unbroken chain of disclosure, denial, and subsequent institutional adoption linking County- and State-level behavioral-health reform language to the ADA-protected BCCP™ and B2C3A™ frameworks. Each entry is verifiable through public minutes or official correspondence and collectively confirms systemic convergence between January 2022 and October 2025.

Recognition-Only Declaration

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Cross-Reference: LACDMH Behavioral Health Commission minutes (Apr 4 & Apr 10 2025) and BHSOAC hearings (Apr 24 & May 22 2025) provide corresponding public-record citations.

Respectfully submitted,

Dr. Esroruleh T. Mohammad, Ph.D.
October 2025

Exhibit Q-T2

Continuity and Convergence Analysis

Behavioral Health Services Oversight & Accountability Commission (BHSOAC)

Governance Language and Agenda Framing, February–October 2025

Correlation with ADA-Protected Frameworks BCCP™ and B2C3A™ (Public Record Entry: April 4–10, 2025)

Filed for Public Record – Recognition-Only Submission

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Introductory Statement

This analysis documents measurable linguistic and structural convergence between the BHSOAC's 2025 governance framework and the **BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™)** and **B2C3A™ Pipeline Prevention Frameworks** that were entered into the public record in April 2025. The intent is to preserve evidentiary continuity and inform future provenance and authorship review under the **Bagley-Keene Open Meeting Act** and **Title II ADA** participation standards.

1. Pre–BCCP Era (February–March 2025)

Institutional Character

- Agendas emphasized administrative structure, budget allocation, and compliance oversight rather than systems causation or equity integration.
- Behavioral health was framed as a service domain, not as a public system intersecting justice, housing, and mortality.
- Discussions were categorical (wildfire response, Full-Service Partnership reports, school-based screenings) rather than continuum-based.
- “Continuum” appeared only in narrow clinical contexts.
- No reference was made to cross-system linkages that later became central to the BCCP™ architecture.

Examples

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- **February 27 2025** – Agenda centered on wildfire response and workforce retention; no mention of structural prevention or systemic convergence.
- **March 26 2025** – Focused on “governance and legal requirements,” “team organization,” and “portfolio of projects,” emphasizing internal management rather than reform or integration.

Summary

Prior to April 2025, Commission discourse reflected operational maintenance and compliance, not systemic reform or continuum integration.

2. Post–BCCP Public Entry (April–October 2025)

The public filing of the **BCCP™** and **B2C3A™** frameworks (April 4–10 2025) correlates with a *documented institutional inflection* in the Commission’s governance language and framing.

a. April 24 2025 – Immediate Convergence Window

- Occurred within two weeks of framework entry.
- Introduction of “Caring Moment” language reflecting the BCCP™ framework’s human-centered accountability orientation.
- Expansion of Advocacy Spotlights and Peer Respite Concept Paper discussions employing continuum and partnership terminology aligned with B2C3A™.
- Shift in agenda descriptors from “programs” to “frameworks” and “partnership models.”

b. May 22 2025 – Systemic Inflection Point

- Agenda items such as “*Full-Service Partnership Grant*” and “*Impacts of Firearm Violence*” incorporated continuum and prevention framing.
- *Innovation Partnership Fund & Public-Private-Nonprofit Partnerships* Discussion introduced systemic-innovation logic parallel to B2C3A™’s Convergent Accountability Architecture.
- Governor’s May Revise presented behavioral health as public infrastructure, echoing BCCP™’s prevention-architecture framing first submitted April 10 2025.

c. October 23 2025 – Full Institutional Adoption

- Agenda 11: “Mental Health Wellness Act: California’s Crisis Continuum” — first formal use of continuum as statewide governance architecture.
- Agenda 12: “Innovation Partnership Fund Framework Approval” — formal incorporation of framework-based governance language.
- Agenda 18: “Client, Family, and Community Inclusion, Lived Experience, and Diversity Advisory Committee” — reflects B2C3A™ relational-governance principles.

Key Indicator:

By October 2025, *Crisis Continuum* evolved from a discussion topic to a *structural construct* embedded in statewide behavioral-health governance vocabulary.

3. Structural and Linguistic Comparison

Category	Pre–April 2025	Post–April 2025
Conceptual Language	Administrative, programmatic	Systemic, continuum-based
Governance Framing	Compliance & budgeting	Accountability & convergence
Human-Centered Language	Absent	Introduced (“Caring Moment,” inclusion themes)
Innovation Focus	Project-level	Systemic, cross-sector
Use of “Continuum”	Minimal, clinical	Structural, statewide
Cross-System Linkages	Fragmented	Explicit (health–safety–housing)
Framework Formalization	None	<i>Innovation Partnership Fund Framework; Crisis Continuum</i>
Leadership Tone	Procedural	Integrative, reform-oriented
Public Role	Input	Co-governance and accountability partner

4. Implication: Documented Convergence and Provenance

The record shows a **traceable shift in institutional logic—from administrative oversight to prevention-based systems governance—occurring immediately after the frameworks’ public entry.**

Between February and October 2025, BHSOAC materials demonstrate a measurable evolution from compliance to systemic accountability, introducing key conceptual markers—continuum logic, convergence, public inclusion, and human-centered governance—first defined in the BCCP™ and B2C3A™ frameworks.

5. Evidentiary Value

The convergence is both **linguistic** (terminology, framing) and **structural** (agenda design, decision architecture).

It provides public-record evidence of framework adoption and systemic influence consistent with **Government Code § 11120 et seq.** and **ADA Title II** participation standards.

When read in conjunction with *Exhibit Q-T1 (Continuity and Provenance Timeline)*, the analysis confirms authorship provenance and institutional alignment across County and State levels.

Recognition-Only Declaration

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Respectfully submitted,

Dr. Esroruleh T. Mohammad, Ph.D.

Clinical Psychologist (on ADA Medical Leave)

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Author, BCCP™ and B2C3A™ Frameworks

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