



## IAPD Report

# KEVIN DANIEL BARLETTA

CRD# 4691033

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Please contact FINRA with any concerns.



## IAPD Information About Representatives

IAPD offers information on all current-and many former representatives. Investors are strongly encouraged to use IAPD to check the background of representatives before deciding to conduct, or continue to conduct, business with them.

### What is included in a IAPD report?

IAPD reports for individual representatives include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards.

It is important to note that the information contained in an IAPD report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

### Where did this information come from?

The information contained in IAPD comes from the Investment Adviser Registration Depository (IARD) and FINRA's Central Registration Depository, or CRD, (see more on CRD below) and is a combination of:

- information the states require representatives and firms to submit as part of the registration and licensing process, and
- information that state regulators report regarding disciplinary actions or allegations against representatives.

### How current is this information?

Generally, representatives are required to update their professional and disciplinary information in IARD within 30 days.

### Need help interpreting this report?

For help understanding how to read this report, please consult NASAA's IAPD Tips page <http://www.nasaa.org/IAPD/IARReports.cfm>

### What if I want to check the background of an Individual Broker or Brokerage Firm?

To check the background of an Individual Broker or Brokerage firm, you can search for the firm or individual in IAPD. If your search is successful, click on the link provided to view the available licensing and registration information in FINRA's BrokerCheck website.

### Are there other resources I can use to check the background of investment professionals?

It is recommended that you learn as much as possible about an individual representative or Investment Adviser firm before deciding to work with them. Your state securities regulator can help you research individuals and certain firms doing business in your state. The contact information for state securities regulators can be found on the website of the North American Securities Administrators Association <http://www.nasaa.org>



## Report Summary

### KEVIN DANIEL BARLETTA (CRD# 4691033)

The report summary provides an overview of the representative's professional background and conduct. The information contained in this report has been provided by the representative, investment adviser and/or securities firms, and/or securities regulators as part of the states' investment adviser registration and licensing process. The information contained in this report was last updated by the representative, a previous employing firm, or a securities regulator on **09/26/2025**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
<b>B</b>	INTERNATIONAL ASSETS ADVISORY, LLC	CRD# 10645	06/23/2021
<b>IA</b>	INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC	CRD# 144426	11/17/2021

### QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **6** jurisdiction(s).

Is this representative currently Inactive or Suspended with any regulator? **No**

**Note:** Not all jurisdictions require IAR registration or may have an exemption from registration.

Additional information including this individual's qualification examinations and professional designations is available in the Detailed Report.

### REGISTRATION HISTORY

This representative was previously registered with the following firm(s):

	FIRM	CRD#	LOCATION	REGISTRATION DATES
<b>IA</b>	ROYAL ALLIANCE ASSOCIATES, INC.	23131	HAWTHORNE, NY	01/27/2017 - 11/13/2020
<b>B</b>	ROYAL ALLIANCE ASSOCIATES, INC.	23131	HAWTHORNE, NY	01/19/2017 - 11/13/2020
<b>B</b>	LPL FINANCIAL LLC	6413	HAWTHORNE, NY	10/29/2015 - 01/09/2017

For additional registration and employment history details as reported by the individual, refer to the Registration and Employment History section of the Detailed Report.

### DISCLOSURE INFORMATION

Disclosure events include certain criminal charges and convictions, formal investigations and disciplinary actions initiated by regulators, customer disputes and arbitrations, and financial disclosures such as bankruptcies and unpaid judgments or liens.

Are there events disclosed about this representative? **Yes**

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1
Criminal	1
Termination	1



## Qualifications

### REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works. This individual is currently registered with 6 jurisdiction(s) and 1 SRO(s) through his or her employer(s).

#### Employment 1 of 2

Firm Name: **INTERNATIONAL ASSETS ADVISORY, LLC**  
Main Address: 111 N. ORANGE AVENUE  
SUITE 1000  
ORLANDO, FL 32801  
Firm ID#: 10645

Regulator	Registration	Status	Date
<b>B</b> FINRA	General Securities Representative	Approved	06/23/2021
<b>B</b> Connecticut	Agent	Approved	11/08/2022
<b>B</b> Massachusetts	Agent	Approved	02/20/2025
<b>B</b> Minnesota	Agent	Approved	12/13/2022
<b>B</b> New Mexico	Agent	Approved	07/19/2021
<b>B</b> New York	Agent	Approved	07/15/2021
<b>B</b> South Carolina	Agent	Approved	05/15/2024

#### Branch Office Locations

**INTERNATIONAL ASSETS ADVISORY, LLC**  
HOPEWELL JUNCTION, NY

#### Employment 2 of 2

Firm Name: **INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC**  
Main Address: 111 NORTH ORANGE AVENUE  
SUITE 1000  
ORLANDO, FL 32801  
Firm ID#: 144426



## Qualifications

Regulator	Registration	Status	Date
<b>IA</b> New York	Investment Adviser Representative	Approved	11/17/2021

### Branch Office Locations

**INTERNATIONAL ASSETS INVESTMENT MANAGEMENT,  
LLC**  
HOPEWELL JUNCTION, NY



## Qualifications

### PASSED INDUSTRY EXAMS

This section includes all industry exams that the representative has passed. Under limited circumstances, a representative may attain registration after receiving an exam waiver based on a combination of exams the representative has passed and qualifying work experience. Likewise a new exam requirement may be grandfathered based on a representative's specific qualifying work experience. Exam waivers and grandfathering are not included below.

**This individual has passed 0 principal/supervisory exams, 2 general industry/product exams, and 2 state securities law exams.**

#### Principal/Supervisory Exams


Exam	Category	Date
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No information reported.

#### General Industry/Product Exams


Exam	Category	Date
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 Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
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 General Securities Representative Examination (S7)	Series 7	12/18/2003
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#### State Securities Law Exams

Exam	Category	Date
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 Uniform Investment Adviser Law Examination (S65)	Series 65	11/17/2021
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  Uniform Combined State Law Examination (S66)	Series 66	11/26/2003
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### PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **0** professional designation(s).

No information reported.



## Registration & Employment History

### PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
IA	01/27/2017 - 11/13/2020	ROYAL ALLIANCE ASSOCIATES, INC.	CRD# 23131	HAWTHORNE, NY
B	01/19/2017 - 11/13/2020	ROYAL ALLIANCE ASSOCIATES, INC.	CRD# 23131	HAWTHORNE, NY
B	10/29/2015 - 01/09/2017	LPL FINANCIAL LLC	CRD# 6413	HAWTHORNE, NY
B	12/19/2003 - 11/11/2015	AMERIPRISE FINANCIAL SERVICES, INC.	CRD# 6363	HAWTHORNE, NY
B	12/19/2003 - 07/03/2006	IDS LIFE INSURANCE COMPANY	CRD# 6321	MINNEAPOLIS, MN

### EMPLOYMENT HISTORY

Below is the representative's employment history for up to the last 10 years.

Employment Dates	Employer Name	Position	Investment Related	Employer Location
06/2021 - Present	INTERNATIONAL ASSETS ADVISORY, LLC	REGISTERED REPRESENTATIVE	Y	ORLANDO, FL, United States
06/2021 - Present	INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC	INVESTMENT ADVISOR REPRESENTATIVE	Y	HOPEWELL JUNCTION, NY, United States
11/2020 - 05/2021	UNEMPLOYED	n/a	N	HOPEWELL JUNCTION, NY, United States
01/2017 - 10/2020	ROYAL ALLIANCE ASSOCIATES	Registered Representative	Y	HAWTHORNE, NY, United States
10/2015 - 01/2017	LPL FINANCIAL, LLC	Registered Representative	Y	HAWTHORNE, NY, United States

### OTHER BUSINESS ACTIVITIES

This section includes information, if any, as provided by the representative regarding other business activities the representative is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent, or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious, or fraternal and is recognized as tax exempt.

- 1) INTERNATIONAL ASSETS INVESTMENT MANAGEMENT LLC 111 N ORANGE AVE, STE 1000, ORLANDO, FL 32801 - RIA AFFILIATE OF INTERNATIONAL ASSETS ADVISORS - ADVISOR SINCE 8/2021 - APPROX 160 HRS/MO - FEE BASED COMPENSATION
- 2) DIG INN MULTI-LOCATION RESTAURANT - PASSIVE INVESTOR SINCE 4/2021 - LESS THAN 1 HR/MO - NO COMPENSATION



## Disclosure Summary

### Disclosure Information

#### What you should know about reported disclosure events:

##### (1) Certain thresholds must be met before an event is reported to IARD, for example:

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

##### (2) Disclosure events in IAPD reports come from different sources:

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

##### (3) There are different statuses and dispositions for disclosure events:

- A disclosure event may have a status of *pending*, *on appeal*, or *final*.
  - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
  - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
  - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
  - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
  - A "settled" matter generally represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
  - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

##### (4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.



## DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1
Criminal	1
Termination	1

### Regulatory Event

This disclosure event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a federal regulator such as the Securities and Exchange Commission or the Commodities Futures Trading Commission, or a foreign financial regulatory body) for a violation of investment-related rules or regulations. This disclosure event may also include a revocation or suspension of an Investment Adviser Representative's authority to act as an attorney, accountant or federal contractor.

#### Disclosure 1 of 1

**Reporting Source:** Regulator

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:**

**Date Initiated:** 10/15/2020

**Docket/Case Number:** [2017052828301](#)

**Employing firm when activity occurred which led to the regulatory action:** LPL Financial LLC

**Product Type:** Other: REITs

**Allegations:** Without admitting or denying the findings, Barletta consented to the sanctions and to the entry of findings that he circumvented his member firm's WSPs in connection with prohibited cross trades of alternative investment products by falsifying journal entry forms to effect unlisted REITs sales from one customer account to other customer accounts. The findings stated that Barletta instructed the sellers to sign one set of journal entry forms to transfer the shares, and the buyers to sign another set of forms to transfer cash payment for the shares. After the customers signed the forms, Barletta altered them to inaccurately describe the parties to the transactions as friends and the transfer of shares as gifts. All customers consented to the transactions and Barletta received no commissions on them. Barletta's conduct prevented the firm from detecting the prohibited transactions and performing its suitability review. The findings also stated that Barletta's conduct caused the firm to create and maintain inaccurate books and records. Barletta's conduct caused the firm to fail to create trade tickets identifying



the terms and conditions of the customers' orders, include the transactions in the firm's blotter, send customer confirmations, or properly identify the transactions on account statements as purchase and sales of securities.

**Current Status:**

Final

**Resolution:**

Acceptance, Waiver & Consent(AWC)

**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?**

No

**Resolution Date:**

10/15/2020

**Sanctions Ordered:**

Civil and Administrative Penalty(ies)/Fine(s)

Suspension

Undertaking

Other: Barletta is required to attend and satisfactorily complete 20 hours of continuing education concerning unlisted REITS, suitability, recordkeeping requirements, and ethical considerations.

**If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?**

No

**(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?**



**(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or**

**(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?**

**Sanction 1 of 1**

<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	All Capacities
<b>Duration:</b>	Two months
<b>Start Date:</b>	11/02/2020
<b>End Date:</b>	01/01/2021

**Monetary Sanction 1 of 1**

<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$5,000.00
<b>Portion Levied against individual:</b>	\$5,000.00
<b>Payment Plan:</b>	
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	02/24/2021
<b>Was any portion of penalty waived?</b>	No



**Amount Waived:**

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**Reporting Source:** Firm

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:**

**Date Initiated:** 10/15/2020

**Docket/Case Number:** [2017052828301](#)

**Employing firm when activity occurred which led to the regulatory action:** ROYAL ALLIANCE ASSOCIATES

**Product Type:** Other: REITS

**Allegations:** WITHOUT ADMITTING OR DENYING THE FINDINGS, BARLETTA CONSENTED TO SANCTIONS AND ENTRY OF FINDINGS THAT HE CIRCUMVENTED HIS PRIOR FIRM'S WSP'S IN CONNECTION WITH PROHIBITED CROSS TRADES OF ALTERNATIVE PRODUCTS.

**Current Status:** Final

**Resolution:** Acceptance, Waiver & Consent(AWC)

**Resolution Date:** 10/15/2020

**Sanctions Ordered:** Civil and Administrative Penalty(ies)/Fine(s)  
Suspension  
Undertaking  
Other: CONTINUING EDUCATION- 20 HOURS

**If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?** No

**(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?**



**(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or**

**(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?**

**Sanction 1 of 1**

<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	ALL CAPACITIES
<b>Duration:</b>	TWO MONTHS
<b>Start Date:</b>	11/02/2020
<b>End Date:</b>	01/01/2021

**Monetary Sanction 1 of 1**

<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$5,000.00
<b>Portion Levied against individual:</b>	\$5,000.00
<b>Payment Plan:</b>	
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	
<b>Was any portion of penalty waived?</b>	No

**Amount Waived:**  
.....

**Reporting Source:** Individual  
**Regulatory Action Initiated By:** FINRA  
**Sanction(s) Sought:**  
**Date Initiated:** 10/15/2020  
**Docket/Case Number:** [2017052828301](#)  
**Employing firm when activity occurred which led to the regulatory action:** LPL FINANCIAL, LLC

**Product Type:** Other: REITS

**Allegations:** Without admitting or denying the findings, Barletta consented to the sanctions and to the entry of findings that he circumvented his member firm's WSPs in connection with prohibited cross trades of alternative investment products by falsifying journal entry forms to effect unlisted REITs sales from one customer account to other customer accounts. The findings stated that Barletta instructed the sellers to sign one set of journal entry forms to transfer the shares, and the buyers to sign another set of forms to transfer cash payment for the shares. After the customers signed the forms, Barletta altered them to inaccurately describe the parties to the transactions as friends and the transfer of shares as gifts. All customers consented to the transactions and Barletta received no commissions on them. Barletta's conduct prevented the firm from detecting the prohibited transactions and performing its suitability review. The findings also stated that Barletta's conduct caused the firm to create and maintain inaccurate books and records. Barletta's conduct caused the firm to fail to create trade tickets identifying the terms and conditions of the customers' orders, include the transactions in the firm's blotter, send customer confirmations, or properly identify the transactions on account statements as purchase and sales of securities.

**Current Status:** Final

**Resolution:** Acceptance, Waiver & Consent(AWC)

**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?** No

**Resolution Date:** 10/15/2020

**Sanctions Ordered:** Civil and Administrative Penalty(ies)/Fine(s)  
Suspension  
Undertaking  
Other: BARLETTA IS REQUIRED TO ATTEND AND SATISFACTORILY COMPLETE 20 HOURS OF CONTINUING EDUCATION CONCERNING UNLISTED REITS, SUITABILITY, RECORDKEEPING REQUIREMENTS AND ETHICAL CONSIDERATIONS.

**Sanction 1 of 1**

**Sanction Type:** Suspension

**Capacities Affected:** ALL CAPACITIES



<b>Duration:</b>	TWO MONTHS
<b>Start Date:</b>	11/02/2020
<b>End Date:</b>	01/01/2021
<b>Monetary Sanction 1 of 1</b>	
<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$5,000.00
<b>Portion Levied against individual:</b>	\$5,000.00
<b>Payment Plan:</b>	
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	
<b>Was any portion of penalty waived?</b>	No
<b>Amount Waived:</b>	



## Criminal

This disclosure event involves a criminal charge against the Investment Adviser Representative that has resulted in a dismissal, plea, acquittal or conviction. The criminal matter may relate to any felony or certain misdemeanor offenses (e.g., bribery, perjury, forgery, counterfeiting, extortion, fraud, wrongful taking of property).

### Disclosure 1 of 1

<b>Reporting Source:</b>	Individual
<b>Court Details:</b>	STATE OF RHODE ISLAND DISTRICT COURT CASE NUMBER 61-2002-16914
<b>Charge Date:</b>	08/31/2002
<b>Charge Details:</b>	1 COUNT MISDEMEANAOR-SHOPLIFTING, NOLO CONTENDERE PLEA
<b>Felony?</b>	No
<b>Current Status:</b>	Final
<b>Status Date:</b>	12/10/2002
<b>Disposition Details:</b>	NOT GUILTY BY THE JUDGE ON 12/10/02



## Termination

This disclosure event involves a situation where the Investment Adviser Representative voluntarily resigned, was discharged or was permitted to resign after allegations were made that accused the Investment Adviser Representative of violating investment-related statutes, regulations, rules or industry standards of conduct; fraud or the wrongful taking of property; or failure to supervise in connection with investment-related statutes, regulations, rules or industry standards of conduct.

### Disclosure 1 of 1

**Reporting Source:** Firm  
**Firm Name:** LPL Financial LLC  
**Termination Type:** Discharged  
**Termination Date:** 12/22/2016  
**Allegations:** Firm has reasonably concluded that advisor failed to adhere to policy regarding cross-trades.  
**Product Type:** Real Estate Security

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**Reporting Source:** Individual  
**Firm Name:** LPL  
**Termination Type:** Discharged  
**Termination Date:** 12/22/2016  
**Allegations:** FIRM REASONABLY CONCLUDED THAT ADVISOR FAILED TO ADHERE TO POLICY REGARDING CROSS TRADES  
**Product Type:** Direct Investment-DPP & LP Interests



## End of Report

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