

Tong, William

From: brian frosh <bfrosh@gmail.com>
Sent: Tuesday, March 5, 2019 10:37 AM
To: Tong, William
Subject: Fwd: see attached for key messages
Attachments: State Impact Center Special Report Key Messaging -- 3-4 Final.docx

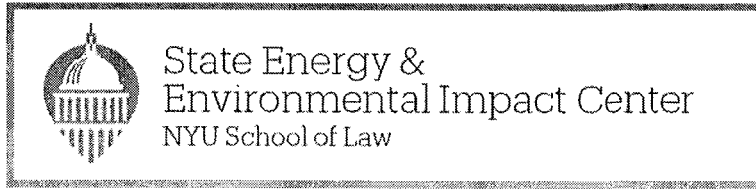
----- Forwarded message -----

From: **David J. Hayes** <david.hayes@nyu.edu>
Date: Mon, Mar 4, 2019, 9:10 PM
Subject: see attached for key messages
To: Brian Frosh <bfrosh@gmail.com>

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David J. Hayes
Executive Director
State Energy & Environmental Impact Center
1015 15th Street, NW, Suite 600
Washington, D.C. 20005
office: (202) 846-0247
cell: (202) 258-3909
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The State Impact Center is part of the NYU School of Law



****Embargoed until March 5 at 3pm EST****

**Special Report: Climate & Health Showdown in the Courts:
State Attorneys General Prepare to Fight**

Key Messaging

Because the Trump administration has failed in so many of its initial attempts to stall the Obama administration's environmental progress, it has been difficult for the public to appreciate the full scope and scale of the Trump administration's deregulatory agenda. In 2019, the Trump administration is preparing to take final action to water-down or repeal six essential federal rules critical to the health and welfare of all Americans, as well as the planet.

These rollbacks give a pass to the largest climate polluters in the United States, setting national efforts to combat climate change back by many years. If successful, the rollbacks will result in annual emissions increases of **more than 200 million metric tons of CO₂e**, while also significantly increasing emissions of conventional air pollutants that severely endanger the health and welfare of millions of Americans, especially disadvantaged communities. This new Special Report from the State Impact Center focuses on the following misguided and unlawful rollbacks:

- Coal Industry: Clean Power Plan (CO₂)
- Automotive Industry: Clean Car Standards (CO₂)
- Automotive Industry: Glider Truck Pollution (CO₂)
- Oil & Gas Industry: Methane emissions (new and existing sources)
- Oil & Gas Industry: Methane emissions (public lands)
- Landfills: Methane emissions

1. The four industries these rollbacks benefit the most account for nearly 50 percent of national greenhouse gas emissions.

The four industries that stand to benefit the most from the Trump administration's climate change rollbacks contributed nearly 50 percent of national greenhouse gas emissions in 2017. **This is according to the EPA's own data.** At a time when the Fourth National Climate Assessment has made it clear that now is the time to act to stave off the worst impacts of climate change, the Trump administration is doing everything it can to give the core drivers of U.S. emissions a pass.

2. The rollbacks carry an enormous cost, representing hundreds of billions of dollars in foregone economic, health and environmental benefits.

The Trump administration has tried to justify its deregulatory agenda with economic arguments tied to cost savings to industry, but the existing rules have all been identified as reasonable and achievable, and the cost savings to industry are minuscule in comparison to the public costs of these rollbacks.

- The Clean Power Plan has an estimated **\$49 billion in economic net benefits by 2030** from reductions in greenhouse gas emissions and other pollutants.
- Rolling back national Clean Car Standards will cost American drivers between **\$193 and \$236 billion dollars** in added fuel expenses by 2035, in addition to eliminating as much as **\$18 billion** in climate and public health benefits each year.
- Rolling back current methane emissions standards for new, reconstructed or modified oil and gas drilling operations will result in economic costs up to **\$170 million by 2025** in the form of forgone net benefits.
- Repealing the Bureau of Land Management’s Waste Prevention Rule will cost the public **\$203 million in foregone environmental and economic benefits by 2026** and \$824 million in foregone cost savings **by 2028**.
- Delaying implementation of methane emissions reductions from landfills will cost an estimated **\$1.5 billion** over the next four years.

3. The public health impact of these rollbacks will be severe, and long lasting.

Because the economic and health-related costs of the Trump administration’s environmental rollbacks arise from different pollutants and occur at different time-scales, the public has not been made fully aware of the magnitude of their impacts. Nevertheless, when they are evaluated on a rule-by-rule basis, the results are staggering, including thousands more premature deaths, hundreds of thousands more asthma attacks, and countless additional missed days of school for children and adults. For instance:

- The Trump administration’s proposal to replace the Clean Power Plan would generate increases in air pollution that could lead to **1,630 premature deaths, 120,000 additional asthma attacks, 140,000 missed school days** and **48,000 lost work days** by 2030.
- Failing to address methane leakage from both new and existing oil and gas operations will generate dangerous, localized pollution that will cause **1,900 premature deaths, 1.1 million asthma attacks, and 3,600 emergency room visits** each year in 2025.
- Reinstating a loophole for the sale of “glider trucks” would put an estimated 120,000 environmentally non-compliant trucks on the road by 2025, causing **9,000 to 21,000 premature deaths** and untold numbers of asthma attacks, emergency visits and lost work days every year.

Finally, the Trump administration’s own analysis has found that these impacts will disproportionately fall on already vulnerable populations and environmental justice communities, including low-income and minority communities across the United States.

4. Through these and other rollbacks, the Trump administration is unleashing a direct attack on states’ rights.

While Trump administration officials, such as recently confirmed EPA Administrator Andrew Wheeler, have claimed that they are committed to working cooperatively with states, their actions

are designed to undermine state efforts to ensure cleaner air and a successful transition to clean energy. By targeting common sense regulations like our national Clean Car Standards and attempting to strip California's legal right to set vehicle greenhouse gas emissions standards, the Trump administration is **fundamentally disregarding states' rights**.

This amounts to a systemic attack on our nation's bedrock environmental laws, and it is why state attorneys general are mounting an essential legal defense of common-sense regulations protecting human health and the environment.

5. The Trump administration is turning its back on its legal obligation to act on climate change.

The Trump administration is legally obligated to act on climate change under the Clean Air Act because of EPA's own finding that greenhouse gases endanger human health and welfare. For the past two years, it has pursued a strategy of avoiding implementation and enforcement of climate rules, but state attorneys general have stepped in, challenged the legality of its delay tactics, and stopped it.

Now the Trump administration has finally come forward with proposed rules of its own, but rather than reducing greenhouse gas emissions, these proposals would either return emissions to previous levels or increase them even further. State attorneys general are fighting to ensure that their local policies, which have successfully reduced emissions for their states, will continue.

Tong, William

From: Tong, William
Sent: Thursday, March 7, 2019 1:33 PM
To: 'brian frosh'
Subject: RE: see attached for key messages

Brian,

Thanks for including me in the press conference this week. Great to see you and catch up. You mentioned that you'd be willing to share your office's application for the fellowship. Can you forward to me at this email? Thanks.

William



WILLIAM TONG
Attorney General

Office of the Attorney General, P.O. Box 120, 55 Elm Street, Hartford, CT 06106
Phone: (860) 808-5314 | **URL:** <http://portal.ct.gov/ag/>

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From: brian frosh [<mailto:bfrosh@gmail.com>]
Sent: Tuesday, March 5, 2019 10:37 AM
To: Tong, William
Subject: Fwd: see attached for key messages

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From: **David J. Hayes** <david.hayes@nyu.edu>
Date: Mon, Mar 4, 2019, 9:10 PM
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To: Brian Frosh <bfrosh@gmail.com>

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David J. Hayes

Executive Director

State Energy & Environmental Impact Center

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Tong, William

From: brian frosh <bfrosh@gmail.com>
Sent: Thursday, March 7, 2019 4:43 PM
To: Tong, William
Subject: Re: see attached for key messages

William

I am tracking it down. There is a version that has been made public, and I need to send you that one. I'll have it by tomorrow.

It was great to see you, too. I hope we have some more opportunities soon.

Best,

Brian

On Thu, Mar 7, 2019 at 1:32 PM Tong, William <AG.Tong@ct.gov> wrote:

Brian,

Thanks for including me in the press conference this week. Great to see you and catch up. You mentioned that you'd be willing to share your office's application for the fellowship. Can you forward to me at this email? Thanks.

William



WILLIAM TONG

Attorney General

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Tong, William

From: Frosh, Brian <bfrosh@oag.state.md.us>
Sent: Friday, March 8, 2019 9:09 AM
To: Tong, William
Subject: NYU application
Attachments: Horner Responsive Documents 1.3.19_Redacted.pdf; ATT00001.txt

William

Attached is the public version of our application to the NYU Impact Center. Please call if you have any questions.

Warm regards,

Brin

O'Malley, Grace

From: O'Malley, Grace
Sent: Friday, September 15, 2017 4:54 PM
To: stateimpactcenter@nyu.edu
Cc: Frosh, Brian; Quattrocki, Carolyn
Subject: Maryland Office of the Attorney General Application
Attachments: MD_OAG NYU Fellow Application.pdf

Good Afternoon,

Thank you for the opportunity to submit this application on behalf of the State of Maryland for additional support to defend environmental protections. Please see attached the Maryland Office of the Attorney General's grant application for the purpose of hiring special assistant attorneys general (SAAGs). Please contact our Office with any questions or concerns about the application at the contact information below. Thank you again for this opportunity.

Sincerely,

Grace

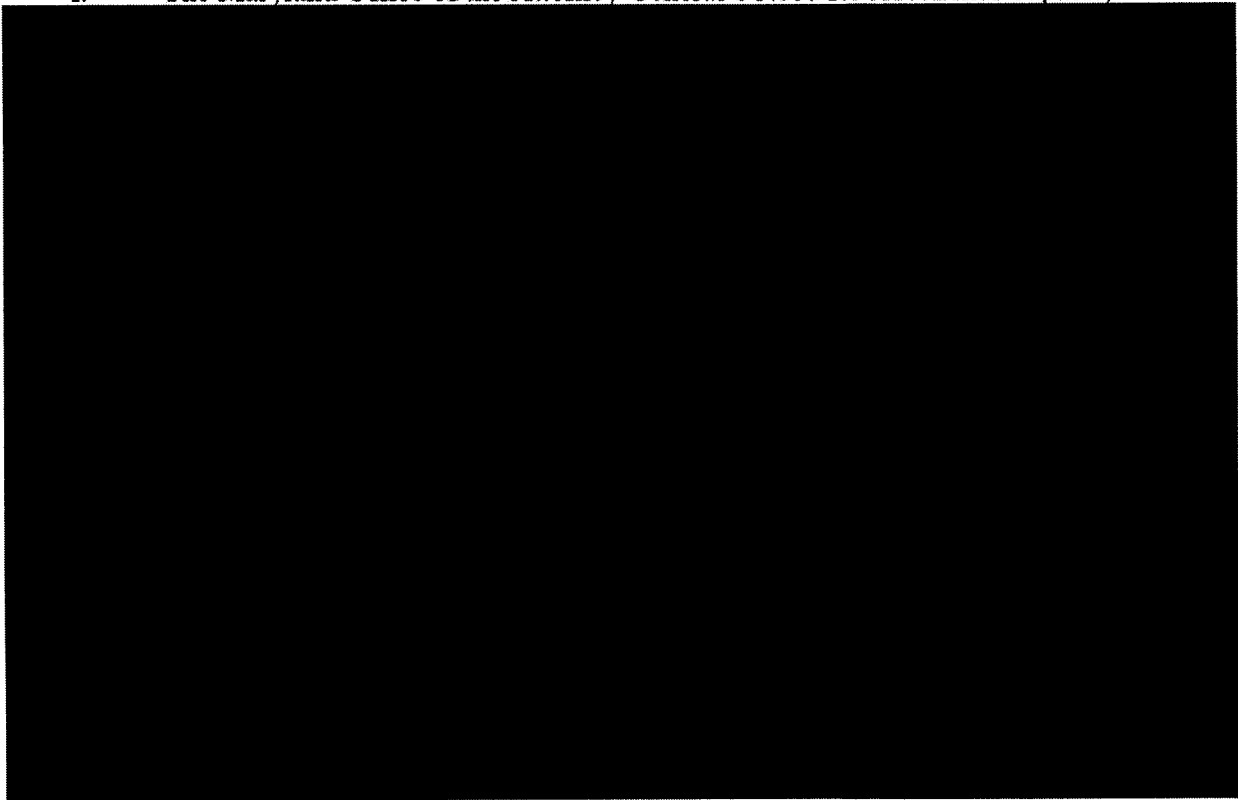
Grace O'Malley
Executive Assistant to
Attorney General Brian E. Frosh
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200 St. Paul Place
Baltimore, MD 21202
Ph: [410-576-6311](tel:410-576-6311) | gomalley@oag.state.md.us

1. Program Eligibility and Narrative

State attorneys general should describe the particular scope of needs within their offices related to the advancement and defense of progressive clean energy, climate change, and environmental matters. Relevant details include the extent to which funding or other capacity constraints have limited the ability to work on these issues or how additional dedicated support could help advance the work of the state attorney general on behalf of his or her constituents.

Priority consideration will be given to state attorneys general who demonstrate a commitment to and acute need for additional support on clean energy, climate change, and environmental issues of regional or national importance, such as those matters that cross jurisdictional boundaries or raise legal questions or conflicts that have nationwide applicability.

I. The Maryland Office of the Attorney General’s Need for Additional Capacity



Our Office has used, and will continue to use, its authority⁴ newly

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

⁴ Md. Legis.S.JR0001. Reg. Sess. 2017. Maryland State Legislature. Sept. 6, 2017. <http://mgaleg.maryland.gov/webmga/firmMain.aspx?pid=billpage&tab=subject3&stab=01&id=si0005&ys=2017rs>

granted by the Maryland legislature to take legal action to defend against the federal government's efforts to turn the clock back on environmental protections and the battle against climate change (see Appendix A). [REDACTED]

[REDACTED]

[REDACTED] Since taking office, President Trump has attempted to rollback, freeze, eliminate, or revoke no less than 23 regulations and/or Executive Orders promulgated under President Obama and previous administrations.⁵ The Maryland OAG is already involved in multiple lawsuits challenging these actions.

[REDACTED]

[REDACTED]

⁵ Popovich, Nadja and Schlossberg, Tatiana, "23 Environmental Rules Rolled Back in Trump's First 100 Days." The New York Times, May 2, 2017.

[REDACTED]

II. Attorney General Frosh and the Maryland Office of the Attorney General's Commitment to the Environment

[REDACTED]
[REDACTED]. Attorney General Frosh has demonstrated a commitment to clean energy, climate change, and the environment over nearly 30 years of public service as a Maryland legislator, and he has continued to act as an environmental advocate as Attorney General. [REDACTED]
[REDACTED]
[REDACTED]

As a Maryland legislator, Attorney General Frosh consistently championed environmental causes through legislation and advocacy. Mr. Frosh served as a member of the Green Caucus (1996-2015), the Task Force on Energy Conservation and Efficiency (2001), the U.S. Clean Air Act Advisory Committee (1996-2002), the Chesapeake Bay Commission (1995-2001), the Governor's Commission on Climate Change (2007-2015), and chaired the Environment subcommittee (1995-2003).⁷ Even early on, in 1998, the Washington Post lauded his legislative leadership, saying, "Frosh has risen to become the most prominent advocate for the environment in Annapolis and perhaps the most influential member of the county's legislative delegation."⁸

As a senator and chair of the Judicial Proceedings Committee, Mr. Frosh authored and sponsored legislation that increases accountability for polluters; promotes energy efficiency and clean energy alternatives; and combats the sources of climate change. For example, he authored the Omnibus Oil Spill Protection Act, which increases liability and penalties for oil spills and allows the state to set standards for the transport and storage of petroleum products.⁹ He also sponsored the Energy Conservation and Efficiency Act of 2009, which requires the state and counties to adopt international energy conservation standards¹⁰, and a second bill requiring utility companies to implement energy conservation programs before constructing new power plants.¹¹ To combat climate change, he sponsored the Clean Cars Act of 2007, which requires Maryland to work with other states to promote the regional adoption of Low Emissions Vehicle programs¹², as well as the Greenhouse Gas Emissions Reduction Act 2009, which requires the

⁷ Attorney General." Brian E. Frosh, Maryland Attorney General, Maryland State Archives, Aug. 3, 2017, <http://msa.maryland.gov/msa/mdmanual/08conoff/attorney/html/msa12167.html>

⁸Goodman, Peter S. "Montgomery Senator Takes Powerful Role on Farms, Ecology." The Washington Post, Mar. 9, 1998, pp. C1,C5. Maryland State Archives. Sept. 6, 2017.

http://msa.maryland.gov/megafile/msa/speccol/sc3500/sc3520/012100/012167/pdf/post_9mar1998.pdf

⁹ Md. Legis. Assemb. Ch 294, House Bill 190. Reg. Sess. 1992. Archives of Maryland Online, Sept. 6, 2017.

<http://aomol.msa.maryland.gov/megafile/msa/speccol/sc2900/sc2908/000001/000808/html/am808--2547.html>

¹⁰ Md. Legis.S. Ch 294, Senate Bill 625. Reg. Sess. 2009. Maryland State Legislature. Sept. 6, 2017.

<http://mgaleg.maryland.gov/webmga/frmMain.aspx?ys=2009rs/billfile/SB0625.htm>

¹¹ Md. Legis.S. Ch 631, Senate Bill 631. Reg. Sess. 2007. Maryland State Legislature. Sept. 6, 2017.

<http://mgaleg.maryland.gov/webmga/frmMain.aspx?ys=2007RS%2fbillfile%2fsb0562.htm>

¹² Md. Legis. S. Fiscal and Policy Note, Senate Bill 51. Reg. Sess. 2007. Maryland State Legislature. Sept. 6, 2017. http://mlis.state.md.us/2007RS/fnotes/bil_0001/sb0051.pdf

State to implement a strategy to reduce statewide greenhouse gas emissions by 25% from 2006 levels by 2020.¹³ Thus, Mr. Frosh continually used his position to advance a progressive environmental agenda.

Political commentators and longtime environmental activists took note of Mr. Frosh's commitment; in 2003, the Washington Post described Mr. Frosh as a 'Giant Killer' in reference to his penchant for challenging powerful corporations and the political establishment to increase environmental protections¹⁴. He was also recognized through numerous awards, including 1989 "Conservationist of the Year" from the Sierra Club, 1999 "Public Official of the Year" from the Audubon Naturalist Society, the "John V. Kabler Memorial Award" from the Maryland League of Conservation Voters in 2003, and "Legislator of the Year" from 1000 Friends of Maryland.¹⁵

As the chief legal officer of the State, Mr. Frosh has continued his environmental advocacy by defending environmental protections of regional and national significance. During the 2017 Maryland Legislative Assembly, the legislature passed a joint resolution, the Maryland Defense Act of 2017, which authorized the Attorney General to pursue legal action without prior authorization from the Governor when federal action threatens the public interest and welfare of Marylanders.⁴ Since the passage of this resolution, our Office has submitted multiple comments on federal regulatory action, joined amicus briefs in litigation challenging actions taken by the Trump Administration, and intervened with other states as parties in multiple lawsuits. We have also authored or signed multi-state letters urging Congress and the President to promote environmental interests. Examples include the January 17, 2017, letter to the U.S. Senate opposing the confirmation of then-Oklahoma Attorney General Scott Pruitt as Administrator of the Environmental Protection Agency¹⁶, and the April 25, 2017, letter urging the Trump Administration to reconfirm the United States' commitment to the Paris Agreement on climate change¹⁷. Our Office has also demonstrated its commitment to combatting climate change and promoting clean energy through its involvement in litigation defending the Clean Air Act and its regulations, such as the Clean Power Plan. Specific examples of litigation in which the OAG has been involved are attached as Appendix A.

¹³ Md. Legis.S. Ch 172, Senate Bill 278. Reg. Sess. 2009. Maryland State Legislature. Sept. 6, 2017.

<http://mgaleg.maryland.gov/webmga/frmMain.aspx?ys=2009rs/billfile/sb0278.htm>

¹⁴ Mosk, Matthew. "Frosh Goes From Backbencher to 'Giant Killer.'" The Washington Post, Mar. 16, 2003. Maryland State Archives. Sept. 6, 2017.

http://msa.maryland.gov/megafile/msa/speccol/sc3500/sc3520/012100/012167/pdf/post_16mar2003.pdf

¹⁵"Archives of Maryland (Biographical Series)." Brian E. Frosh, MSA SC 3520-12167, Maryland State Archives, 4 Dec. 2014. Sept. 6, 2017.

<http://msa.maryland.gov/megafile/msa/speccol/sc3500/sc3520/012100/012167/html/12167bio.html>

¹⁶ "AG Multistate Letter to US Senate." Received by Chairman Barrasso & Ranking Member Carper. AG Multistate Letter to US Senate, Attorneys General of Delaware, District of Columbia, Hawai'i, Maryland, Massachusetts, New York, Oregon, Rhode Island. Jan., 17, 2017.

http://www.marylandattorneygeneral.gov/News%20Documents/AG_Multistate_Letter_to_US_Senate_EPW_Jan17_2017.pdf

¹⁷ "Paris Climate Agreement Letter." Received by President Donald Trump. AG Multistate Letter to President Trump, Attorneys General of Maryland, Delaware, Iowa, Massachusetts, Connecticut, District of Columbia, Maine, Minnesota, New York, Oregon, Vermont, North Carolina, Rhode Island, American Samoa. April 25, 2017.

http://www.marylandattorneygeneral.gov/News%20Documents/Paris_Climate_Agreement_letter.pdf

Therefore, Attorney General Frosh and the Maryland Office of the Attorney General have consistently demonstrated a commitment to enhancing and protecting environmental laws and regulations for the purpose of combating climate change and promoting clean energy. [REDACTED]

2. Program Structure

Applications should include specific details about the scope of expertise the state attorney general needs in a SAAG to advance his or her priorities. Details should also be provided about how the SAAG would be incorporated into the Office of the Attorney General, including the relevant internal reporting structure.

The SAAGs would work in the central office in Baltimore rather than at a satellite site with current attorneys representing state environmental agencies. This central location would enable frequent direct contact among the SAAGs, Attorney General Frosh, and senior staff as they collaborate [REDACTED].

Ideal candidates will have a minimum of five years of legal experience, membership in the Maryland Bar and the US District Court for the District of Columbia, and substantial experience working with environmental law and regulation. If not members of the Maryland Bar, candidates would at minimum become members of the US District Court for the District of Columbia within the first months of employment.

Candidates should also have a demonstrated working knowledge of legal issues related to [REDACTED]. As noted previously, the SAAGs would be instrumental in implementing [REDACTED]. Position responsibilities would also include legal and regulatory advice, and litigation before state, federal, and appellate courts, as well as administrative agencies. SAAGs would report to a member of the Attorney General's senior staff within the Executive Division.

3. Budget Proposal and Confirmation of Authority

To be considered complete, applications must identify a proposed salary (or range) for a SAAG, with an explanation of how it would conform with the existing salary structure in the state AG office.

Applications also should identify any state-specific limitations or requirements governing the appointment of an employee paid by an outside funding source, and include a written confirmation that the attorney general has the authority to hire an NYU Fellow as a SAAG (or equivalent title).

The proposed salary for an SAAG would depend upon the candidate's experience, but it could be as high as \$125,000.

Maryland does not have any state-specific limitations or requirements governing appointment of an employee paid by an outside funding source. Attorney General Brian Frosh has the authority to hire an NYU Fellow as a SAAG.

APPENDIX A

Our Office has demonstrated its commitment to reducing emissions of pollutants that cause climate change by intervening in *North Dakota v. EPA* and *W. Virginia v. EPA* in 2015 to defend the Clean Power Plan, which regulates emissions from new and existing power plants. Maryland intervened in *North Dakota v. EPA* in November of 2015, joining California and other states in defending §111(b) of the Clean Air Act, which requires certain new or modified power plants to achieve emissions limits and to use a carbon capture system that has been demonstrated to be the best system of emissions reduction. [REDACTED]

[REDACTED] Similarly, in November of 2015, Maryland joined New York and other states in support of another Clean Power Plan regulation, §111(d), that requires states to enact more stringent limits on greenhouse gas emissions from existing fossil fuel-fired power plants. [REDACTED]

[REDACTED] Our office has also intervened to defend regulations limiting mercury and air toxic emissions from power plants. Our Office initially joined with Massachusetts and other states in 2012 to defend standards that limit mercury and other toxic emissions from coal-fired power plants. This rule and the EPA's supplemental finding that the rule was "appropriate and necessary," were challenged by Murray Energy Corporation. Throughout the litigation Maryland has continued as an intervenor in support of the rule to limit mercury and other toxic emissions from power plants. [REDACTED]

In addition, our Office recently intervened in *Clean Air Council, et al. v. Pruitt*, on June 21, 2017, [REDACTED]

[REDACTED]. The methane oil and gas rule was adopted by the EPA in 2016 and immediately challenged by the oil and gas industry. Maryland initially intervened in support of the EPA's rule in *American Petroleum Institute, Inc. v. EPA*. On June 2, 2017, however, while the case was being held in abeyance by the U.S. Court of Appeals for the District of Columbia, the EPA sought an administrative stay to halt the implementation of the methane oil and gas rule. In response, NGOs such as the Clean Air Council, Natural Resources Defense Council, Sierra Club, and others filed a petition for judicial review of the administrative stay. This time, Maryland and other states intervened in support of the NGOs' position in opposition to the EPA's administrative stay. The U.S. Court of Appeals for the District of Columbia issued a mandate vacating the EPA's administrative stay, and the EPA's request for a rehearing on the mandate was denied. [REDACTED]

[REDACTED]. Maryland again demonstrated its commitment to defending environmental regulations by joining a Notice of

Intent to Sue (“NOI”) EPA for its failure to issue emissions guidelines for methane gas from *existing* oil and gas operations under the Clean Air Act §111(d). The NOI, sent on June 28, 2017, explained that by not issuing these standards, the EPA has failed to carry out its mandatory duty or it has subjected its issuance to an unreasonable delay. [REDACTED]

[REDACTED]

[REDACTED]