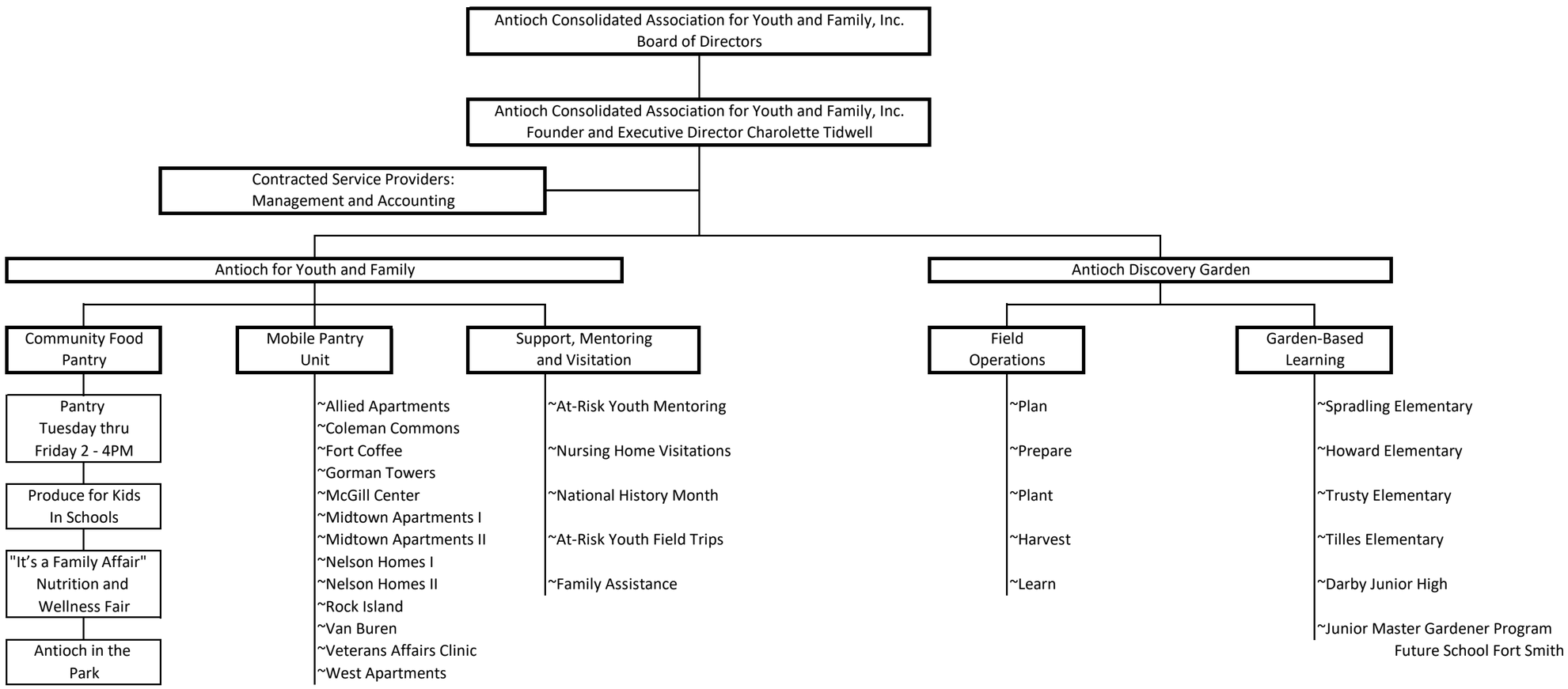ORGANIZATION AND OPERATIONS