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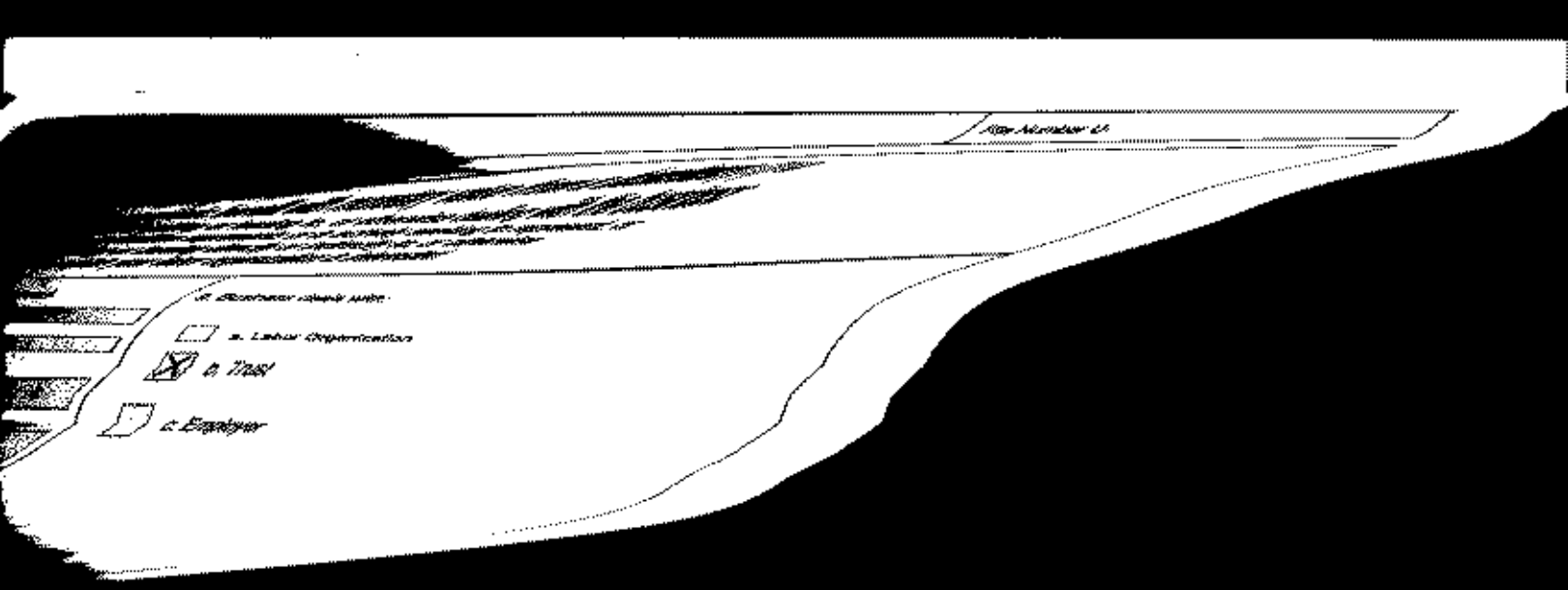
...by 26 U.S.C 439 or 440.

...any of the following interests