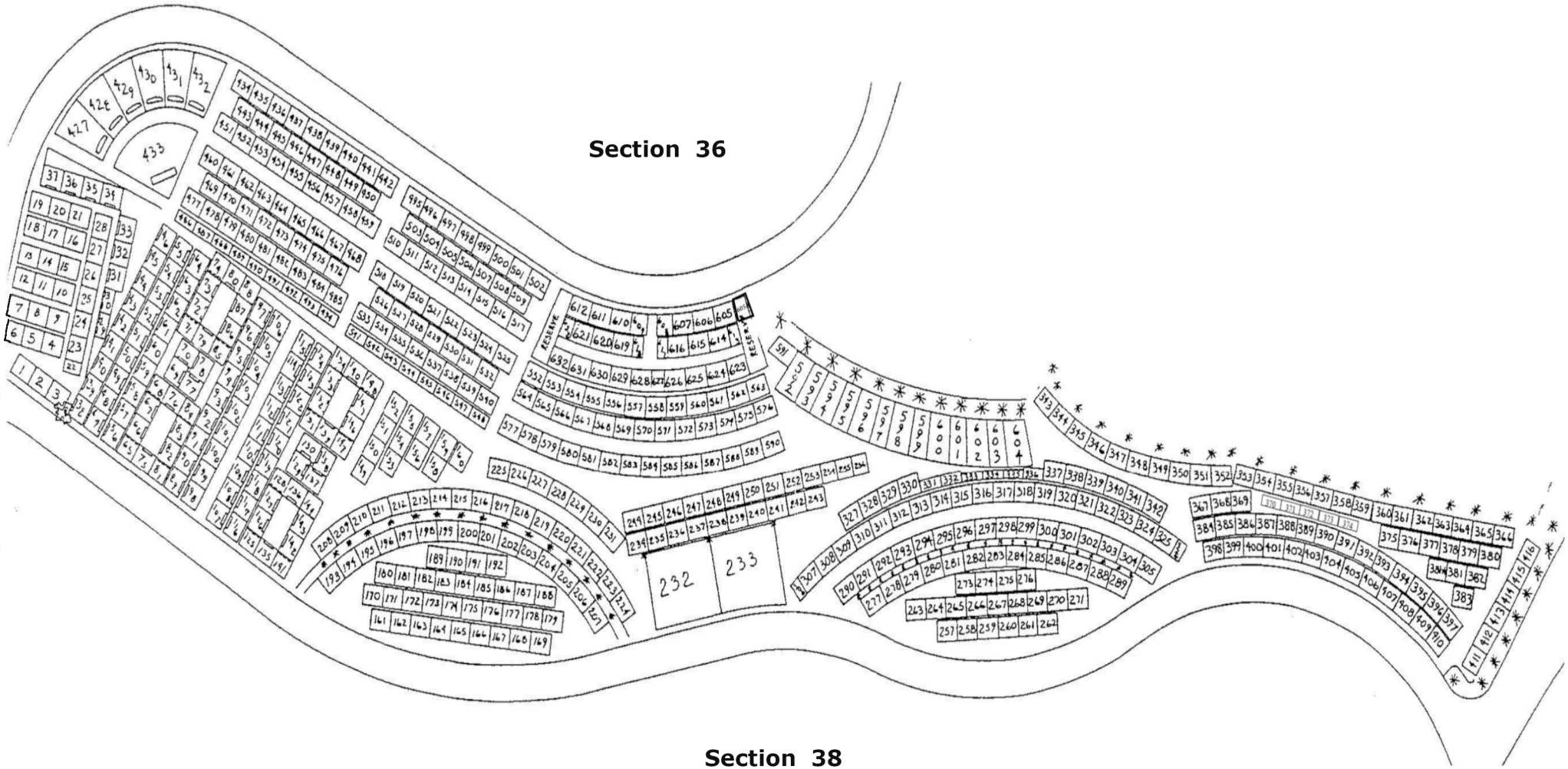Section 37