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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

14 **SECURITIES AND EXCHANGE**
15 **COMMISSION,**

16 **Plaintiff,**

17 **vs.**

18 **PUNCH TV STUDIOS, INC., and**
19 **JOSEPH COLLINS**

20 **Defendants.**

Case No. 21-cv-07787

COMPLAINT

23 Plaintiff Securities and Exchange Commission (“SEC”) alleges:

24 **JURISDICTION AND VENUE**

25 1. The Court has jurisdiction over this action pursuant to Sections 20(b),
26 20(d)(1) and 22(a) of the Securities Act of 1933 (“Securities Act”), 15 U.S.C. §§
27 77t(b), 77t(d)(1) & 77v(a).

28 2. Defendants have, directly or indirectly, made use of the means or

1 instrumentalities of interstate commerce, of the mails, or of the facilities of a national
2 securities exchange in connection with the transactions, acts, practices and courses of
3 business alleged in this complaint.

4 3. Venue is proper in this district pursuant to Section 22(a) of the Securities
5 Act, 15 U.S.C. § 77v(a), because certain of the transactions, acts, practices and
6 courses of conduct constituting violations of the federal securities laws occurred
7 within this district. In addition, venue is proper in this district because Defendant
8 Joseph Collins resides in this district and Defendant Punch TV Studios, Inc. has its
9 principal place of business in this district.

10 **SUMMARY**

11 4. The SEC brings this civil enforcement action against defendants Punch
12 TV Studios, Inc. (“Punch TV”) and its founder, chief executive officer and
13 controlling shareholder, Joseph Collins (“Collins”) (with Punch TV, “Defendants”),
14 for violating the offering registration provisions of the federal securities laws.
15 Between January 2018 until June 2020, Defendants raised more than \$1.2 million
16 from nearly 700 investors through two unregistered offerings of Punch TV’s common
17 stock. Neither offering was registered with the SEC, nor did either offering qualify
18 for any exemption from registration.

19 5. This is not the first time Punch TV has violated the securities registration
20 requirements. Defendants’ unregistered offerings came on the heels of the
21 company’s 2018 settlement to an SEC administrative order (the “Suspension Order”),
22 that halted an offering Punch TV commenced in 2016 under Securities Act
23 Regulation A, 17 C.F.R. § 230.100 *et seq.* (“Regulation A”). The Suspension Order,
24 which stopped Punch TV’s offering for nine months and permitted it to resume only
25 upon the satisfaction of certain undertakings, contained findings that Punch TV failed
26 to file audited financial statements and other reports required to offer and sell
27 securities under a qualified Regulation A offering statement.

28 6. Despite the Suspension Order, Defendants continued offering and selling

1 Punch TV's \$1/share common stock in violation of the order and without satisfying
2 any of the Securities Act registration offering exemptions. Separately, Defendants
3 embarked on a new, unregistered \$5/share offering of Punch TV's common stock that
4 did not comply with any exemptions from registration. By not registering Punch
5 TV's offerings, Defendants deprived investors of meaningful information that would
6 be found in a registration statement that investors could use to assess the company's
7 prospects.

8 7. By engaging in this conduct, Defendants violated, and may be
9 continuing to violate, the securities registration provisions of Sections 5(a) and 5(c)
10 of the Securities Act, 15 U.S.C. § 77f(a), (c).

11 8. The SEC seeks findings that the Defendants committed these violations;
12 permanent injunctive relief, including permanently enjoining Defendants from,
13 directly or indirectly, including, but not limited to, through any entity owned or
14 controlled by each of them, participating in the issuance, purchase, offer, or sale of
15 any security in an unregistered offering by an issuer; disgorgement and prejudgment
16 interest thereon on a joint-and-several basis; civil monetary penalties; and bars on
17 Defendants participating in the offering of penny stock.

18 **THE DEFENDANTS**

19 9. **Punch TV Studios, Inc.** is a Delaware corporation formed in May 2014,
20 with its principal place of business in Santa Fe Springs, California. Punch TV has
21 one class of securities outstanding, which is not registered with the SEC. On or about
22 January 9, 2018, Punch TV settled a prior SEC enforcement proceeding by agreeing
23 to the Suspension Order. *See* Order Making Findings, Specifying Procedures, and
24 Temporarily Suspending Exemptions Pursuant to Section 3(b) of the Securities Act of
25 1933 and Regulation A Thereunder. [https://www.sec.gov/litigation/admin/2018/33-](https://www.sec.gov/litigation/admin/2018/33-10452.pdf)
26 [10452.pdf](https://www.sec.gov/litigation/admin/2018/33-10452.pdf). On or about September 18, 2020, the California Department of Business
27 Oversight issued a Consent Order against Punch TV and Collins ordering them to
28 desist and refrain from selling securities in violation of California law. *See*

1 <https://dfpi.ca.gov/wp-content/uploads/sites/337/2020/09/Consent-Order-Punch-TV->
2 [Studios-Inc.pdf](https://dfpi.ca.gov/wp-content/uploads/sites/337/2020/09/Consent-Order-Punch-TV-Studios-Inc.pdf).

3 10. **Joseph Collins**, age 57, a resident of Santa Fe Springs, California, is the
4 founder, sole board member, chief executive officer, secretary and controlling
5 shareholder of Punch TV, and is the sole signatory on its bank accounts. Collins is
6 not registered with the SEC in any capacity.

7 **THE ALLEGATIONS**

8 11. Punch TV promotes itself as a global leader in media that is working to
9 be a global producer and distributor of entertainment and original content.

10 12. Collins founded Punch TV in or around 2014 and is its sole control
11 person and principal.

12 13. At all relevant times, Collins has prepared Punch TV's SEC filings and
13 approved them for filing with the SEC.

14 14. At all relevant times, Punch TV has used and continues to use the
15 website address <https://punchtvstudios.com>.

16 15. At all relevant times, Punch TV has used and continues to use the email
17 addresses investor-relations@punchtvstudios.com, ir@punchtvstudios.com and
18 punchtv@yahoo.com.

19 16. At all relevant times, Punch TV has used and continues to use a publicly
20 available Facebook page, "Punch TV Studios."

21 17. At all relevant times, Collins has used and continues to use the email
22 address josephcollins@punchtvstudios.com.

23 18. By February 2020, Punch TV had no employees besides himself.

24 19. As of December 2020, Punch TV had not licensed any of its content or
25 generated any revenues from its content, had no revenues in 2020, and was not
26 engaging in any production or broadcasting operations.

27 **A. Punch TV's 2016 Regulation A Offering**

28 20. In April 2016, Punch TV was qualified by the SEC's Division of

1 Corporation Finance (“Corp. Fin.”) to conduct an exempt securities offering under
2 Regulation A.

3 21. Regulation A provides a two-tier exemption from registration for
4 qualified public offerings. At the time of Punch TV’s 2016 Regulation A offering,
5 Tier 2 provided for an exemption for qualified offerings of up to \$50 million in a 12
6 month period.

7 22. Under Regulation A, the SEC’s Division of Corp. Fin. qualifies offerings
8 based on an issuer’s offering statement filed with the SEC on Form 1-A. Pursuant to
9 Regulation A, no sale of securities may be made pursuant to Regulation A until an
10 offering statement for that sale has been qualified. 17 C.F.R. §
11 230.251(d)(2)(i)(A).

12 23. Form 1-A requires that an offering statement for Tier 2 offerings contain
13 audited financial statements. 17 C.F.R. § 239.90; General Instructions, Part FIS
14 (c)(1)(ii) of Form 1-A.

15 24. On March 30, 2016, Punch TV filed a Regulation A Offering Statement
16 on Form 1-A with the SEC (the “2016 Offering Statement”).

17 25. The 2016 Offering Statement offered \$50 million of common stock on a
18 continuous basis in a Tier 2 offering under Regulation A, and was qualified by the
19 Division of Corp. Fin. on April 5, 2016.

20 26. From April 2016 to June, 2017, Punch TV raised at least \$3 million from
21 about 6,600 investors pursuant to its Regulation A offering, selling shares of its
22 common stock for \$1.00 per share.

23 27. Punch TV engaged in a general solicitation of investors for its
24 Regulation A offering.

25 28. Investors generally executed subscription agreements to purchase shares
26 of Punch TV’s Regulation A offering.

27 **B. The SEC’s 2018 Suspension Order against Punch TV**

28 29. On January 9, 2018, the SEC entered the Suspension Order against

1 Punch TV, temporarily suspending its Regulation A offering.

2 30. Punch TV consented to the Suspension Order via an Offer of Settlement
3 executed by Collins on or about December 8, 2017.

4 31. The Suspension Order contained findings that: (1) contrary to its
5 representations to the SEC in the Form 1-A, Punch TV's financial statements filed
6 with the SEC in connection with its Offering Statement were not audited, and (2)
7 Punch TV failed to file timely required periodic reports with the SEC subsequent to
8 the qualification of its Offering Statement.

9 32. Pursuant to the Suspension Order, Punch TV undertook, among other
10 things, not to offer or sell securities under Regulation A for nine months after the
11 Order's entry, or through October 9, 2018.

12 33. Pursuant to the Suspension Order, Punch TV further agreed that it "may
13 continue to offer and sell securities under Regulation A pursuant to the Offering
14 Statement previously qualified by the [Corp. Fin.] on April 5, 2016 only if, before
15 doing so, it files a post-qualification amendment ('PQA') with the [SEC], that PQA is
16 qualified by [Corp. Fin.], and Punch TV complies with all applicable Regulation A
17 requirements; or Punch TV may offer and sell securities under Regulation A pursuant
18 to a new offering statement only if, before doing so, it files the new offering
19 statement on Form 1-A with the [SEC], that Form 1-A is qualified by [Corp. Fin.],
20 and Punch TV complies with all applicable Regulation A requirements."

21 34. After the Suspension Order, Punch TV never filed a PQA with the SEC,
22 nor did it file any new offering statement on Form 1-A.

23 **C. Defendants' Subsequent Unregistered Offers and Sales of Securities**

24 35. Despite the Suspension Order, Defendants continued to offer and sell
25 Punch TV's \$1/share common stock in purported reliance on Regulation A, both
26 during and after the suspension period.

27 36. Additionally, Defendants conducted a new offering of \$5/share Punch
28 TV common stock in purported reliance on an exemption under Securities Act

1 Regulation D, 17 C.F.R. § 230.501 *et seq.* (“Regulation D”).

2 37. Defendants took no steps to register either offering, nor did either
3 offering satisfy any exemption from registration.

4 **1. Defendants Continued to Offer and Sell Punch TV’s \$1/Share**
5 **Stock During and After the Temporary Suspension**

6 38. The Suspension Order prohibited Punch TV from offering or selling its
7 securities in reliance on Regulation A during the period January 10, 2018 through
8 October 9, 2018 (the “suspension period”).

9 39. Between January 10, 2018 and June 2020, Defendants raised
10 approximately \$681,924 from over 660 investors by the sale of Punch TV’s \$1/share
11 common stock.

12 40. Of this amount, Defendants raised approximately \$314,213 during the
13 suspension period, and approximately \$367,711 after the suspension period.

14 41. No registration statement was in effect for Defendants’ offering of
15 Punch TV’s \$1/share stock, and no exemption from registration applied.

16 42. In offering and selling Punch TV’s \$1/share stock, Defendants engaged
17 in a general solicitation of investors and failed to take reasonable steps to verify that
18 the individuals who purchased securities were accredited investors.

19 43. Defendants relied on the statements made by investors as to their
20 accredited status and did not independently verify the accreditation status of Punch
21 TV’s investors.

22 44. Defendants offered and sold Punch TV’s \$1/share stock to investors in
23 multiple states.

24 45. Punch TV was the issuer of the \$1/share stock, and directly offered and
25 sold its shares to investors by email and through phone calls.

26 46. Collins directly offered and sold the Punch TV \$1/share stock.

27 47. Collins personally solicited existing Punch TV shareholders for the
28 \$1/share offering by telephone.

1 48. Through his conduct, Collins was a necessary participant and a
2 substantial factor in the offer and sale of Punch TV's \$1/share stock.

3 49. Investors paid for their shares by check, money order, or by using credit
4 or debit cards.

5 50. Defendants sold the \$1/share stock to one or more unaccredited
6 investors.

7 51. During the suspension period, in early 2018, Punch TV continued to
8 reference publicly its sale of \$1/share common stock consistent with the provisions of
9 its Regulation A Offering.

10 52. For example, Punch TV's Regulation A 2016 Offering Statement
11 remained on its website until the end of January 2018.

12 53. During the suspension period, as late as January 30, 2018, Punch TV's
13 website contained a disclaimer stating that Punch TV was offering securities through
14 the use of an offering statement qualified by the SEC under Regulation A.

15 54. During the suspension period, through at least the end of February, 2018,
16 Punch TV's website, in a section entitled, "Invest in Punch," contained an investor
17 packet with a message from Collins stating that Punch TV had been qualified by the
18 SEC to raise \$50 million at \$1.00 per share through its initial public offering.

19 55. During the suspension period, as late as May 5, 2018, Punch TV's
20 Facebook page featured a post stating that: "Punch TV prepares to close initial stock
21 offering, a \$1 investment can change your life."

22 56. During the suspension period, Defendants sold \$1/share stock to at least
23 17 new shareholders.

24 57. At least nine of the new investors completed their purchases via the
25 same subscription agreement that Punch TV used for its Regulation A offering prior
26 to the suspension order.

27 58. Collins approved the use of the subscription agreement.

28 59. During and after the suspension period, Defendants sold \$1/share stock

1 to nearly 650 existing shareholders.

2 60. In soliciting existing Punch TV shareholders after the Suspension Order,
3 Punch TV generally asked existing shareholders to confirm the number of shares they
4 purchased as listed in a document titled, “Amendment to Subscription Agreement,”
5 which was prepared by Punch TV to memorialize the shareholders’ purchase of
6 additional \$1/share stock.

7 61. The amendment stated that Punch TV and the investors “executed a
8 Subscription Agreement ...[w]herein [i]nvestor purchased certain shares of common
9 stock in Punch” and then “subsequently purchased additional shares of common stock
10 in Punch.”

11 62. The amendment described each purchase of shares after the Suspension
12 Order as a “subsequent purchase,” and provided the date, number of shares, and
13 investment amount.

14 63. Defendants’ offer and sale of Punch TV’s \$1/share common stock
15 during the suspension period violated the Suspension Order, which prohibited any
16 offers or sales in reliance on Regulation A during the suspension period.

17 64. Defendants’ offer and sale of Punch TV’s \$1/share common stock after
18 the suspension period ended violated the Suspension Order, because Punch TV did
19 not complete the undertakings the Suspension Order required for Punch TV to offer
20 and sell securities in reliance on Regulation A after the suspension ended.

21 65. Defendants’ offer and sale of Punch TV’s \$1/share common stock after
22 the suspension period did not qualify for any exemption from registration under
23 Regulation A or any other exemption.

24 66. Collins has stated that he hopes to re-qualify Punch TV for a Regulation
25 A exemption so that it can raise additional capital through another Regulation A
26 offering.

27 **2. Defendants’ Unregistered \$5/Share Offering**

28 67. Between March 2018 and April 2019, Defendants raised at least

1 \$519,230 from approximately 28 investors by the sale of Punch TV's common stock
2 at \$5/share.

3 68. No registration statement was in effect for Defendants' offering of
4 Punch TV's \$5/share stock, and no exemption from registration applied.

5 69. In offering and selling Punch TV's \$5/share stock, Defendants engaged
6 in a general solicitation of investors and failed to take reasonable steps to verify that
7 the individuals who purchased securities were accredited investors.

8 70. Defendants relied on the statements made by investors as to their
9 accredited status and did not independently verify the accreditation status of Punch
10 TV's investors.

11 71. Defendants offered and sold Punch TV's \$5/share stock to investors in
12 multiple states.

13 72. Punch TV was the issuer of the \$5/share stock, and directly offered and
14 sold its shares to investors through its website, on social media, by email and through
15 phone calls.

16 73. Collins directly offered and sold Punch TV \$5/share stock.

17 74. Collins personally solicited prospective investors for the \$5/share
18 offering by telephone.

19 75. Collins was ultimately responsible for deciding whether or not to accept
20 prospective investors' investments in Punch TV under the Form D offering.

21 76. Through his actions, Collins also was a necessary participant and a
22 substantial factor in the offer and sale of Punch TV's \$5/share stock.

23 77. On April 11, 2018, Punch TV filed a Form D with the SEC, giving
24 notice that it was conducting an offering of up to \$1 million of shares at \$5/share
25 under Rule 506(c), listing the first date of sale as April 1, 2018.

26 78. Collins prepared the Form D, and approved its filing with the SEC.

27 79. Punch TV used its website to solicit prospective investors for its
28 \$5/share offering.

1 80. Visitors to the website were permitted to access details of the offering
2 without any restrictions.

3 81. As of approximately January 30, 2018, the website stated that “Punch
4 TV Studios is currently raising \$100 million in direct funding. We are prepared to
5 sell 20 million shares of stock at \$5 per share.”

6 82. As of approximately April 13, 2018, the website stated that “Punch TV
7 is Currently Raising \$500 Million in Direct Funding at \$5.00 per Share.”

8 83. A brochure available on Punch TV’s website in or about at least
9 November 2018, which Collins prepared, advertised that Punch TV was selling 10
10 million shares at \$5/share under Regulation D.

11 84. Promotional materials posted on Punch TV’s website described the offer
12 of shares under Regulation D as late as March 2019.

13 85. As of at least August 2019, Punch TV’s website continued to include a
14 publicly available link to an “Invest Now” page containing links for U.S. and
15 international investors.

16 86. As of at least June 2021, Punch TV’s website included links marked
17 “U.S. and Canadian Investors Only” and “International Investors Invest Here.”

18 87. Collins prepared the promotional materials on Punch TV’s website.

19 88. Collins has admitted that individuals could purchase Punch TV’s
20 \$5/share common stock on Punch TV’s website.

21 89. Defendants also used social media to solicit prospective investors for
22 Punch TV’s \$5/share offering.

23 90. Punch TV ran a February 2018 Facebook advertisement soliciting
24 potential investors to “invest in Punch TV Studios, \$5 a share.”

25 91. Punch TV’s and Collins’s Facebook pages, between approximately April
26 2018 and May 2018 and February 2018 and June 2018, respectively, solicited
27 investors to buy Punch TV shares at \$5.00.

28 92. In or around February 2018, Collins prepared and appeared in a

1 YouTube video titled, “Why Punch TV Studios will make a Billion Dollars,” which
2 offered potential investors a chance to “Invest in the Magic” at “\$5.00 per share” by
3 investing in Punch TV.

4 93. On or about May 15, 2018, Collins announced a NASDAQ position in
5 posts on Punch TV’s Facebook page and in a press release by Punch TV.

6 94. Defendants purchased a lead list to make cold calls to solicit for the
7 \$5/share offering, using a script to pitch the offering to prospective investors.

8 95. Defendants also solicited existing investors for the \$5/share offering by
9 phone.

10 96. Certain investors who purchased the \$5/share offering executed
11 subscription agreements with Punch TV.

12 97. Collins approved the use of the subscription agreement.

13 98. Defendants sold the \$5/share offering to one or more unaccredited
14 investors.

15 99. Defendants’ offer and sale of Punch TV’s \$5/share common stock did
16 not qualify for any exemption from registration under Regulation D or any other
17 exemption.

18 **FIRST CLAIM FOR RELIEF**

19 **Unregistered Offer and Sale of Securities**

20 **Violations of Sections 5(a) and 5(c) of the Securities Act**

21 **(against Defendants Punch TV and Collins)**

22 100. The SEC realleges and incorporates by reference paragraphs 1 through
23 101 above.

24 101. As alleged above, Defendants Punch TV and Collins offered and sold
25 securities, in the form of Punch TV’s \$1/share and \$5/share common stock, to
26 investors in interstate commerce, without filing a registration statement with the SEC,
27 and without qualifying for any exemption from registration.

28 102. By engaging in the conduct described above, Defendant Punch TV and

1 Collins, and each of them, directly or indirectly, singly and in concert with others, has
2 made use of the means or instruments of transportation or communication in
3 interstate commerce, or of the mails, to offer to sell or to sell securities, or carried or
4 caused to be carried through the mails or in interstate commerce, by means or
5 instruments of transportation, securities for the purpose of sale or for delivery after
6 sale, when no registration statement had been filed or was in effect as to such
7 securities, and when no exemption from registration was applicable.

8 103. By engaging in the conduct described above, Defendants Punch TV and
9 Collins have violated, and unless restrained and enjoined, are reasonably likely to
10 continue to violate, Sections 5(a) and 5(c), 15 U.S.C. §§ 77e(a) & 77e(c).

11 **PRAYER FOR RELIEF**

12 WHEREFORE, the SEC respectfully requests that the Court:

13 **I.**

14 Issue findings of fact and conclusions of law that Defendants committed the
15 alleged violations.

16 **II.**

17 Issue judgments, in forms consistent with Rule 65(d) of the Federal Rules of
18 Civil Procedure, permanently enjoining Punch TV and Collins, and their officers,
19 agents, servants, employees and attorneys, and those persons in active concert or
20 participation with any of them, who receive actual notice of the judgment by personal
21 service or otherwise, and each of them, from violating Sections 5(a) and 5(c) of the
22 Securities Act [15 U.S.C. §§ 77e(a), 77e(c)], and permanently enjoining Punch TV
23 and Collins from, directly or indirectly, including, but not limited to, through any
24 entity owned or controlled by each of them, participating in the issuance, purchase,
25 offer, or sale of any security in an unregistered offering by an issuer.

26 **III.**

27 Order Defendants to disgorge, jointly and severally, all funds received from
28 their illegal conduct, together with prejudgment interest thereon, pursuant to

1 Securities Exchange Act of 1934, Sections 21(d)(5) and 21(d)(7) [15 U.S.C. §§
2 78u(d)(5) and 78u(d)(7)].

3 **IV.**

4 Order Defendants to pay civil penalties under Section 20(d) of the Securities
5 Act [15 U.S.C. § 77t(d)].

6 **V.**

7 Enter an order against Defendants, pursuant to Section 20(g) of the Securities
8 Act, 15 U.S.C. § 77t(g), prohibiting them from participating in an offering of penny
9 stock.

10 **VI.**

11 Retain jurisdiction of this action in accordance with the principles of equity and
12 the Federal Rules of Civil Procedure in order to implement and carry out the terms of
13 all orders and decrees that may be entered, or to entertain any suitable application or
14 motion for additional relief within the jurisdiction of this Court.

15 **VII.**

16 Grant such other and further relief as this Court may determine to be just and
17 necessary.

18 Dated: September 30, 2021

19 /s/ Amy Jane Longo

20 Amy Jane Longo

21 Lucee S. Kirka

22 Attorneys for Plaintiff

23 Securities and Exchange Commission
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Complaints and Other Initiating Documents

[2:21-cv-07787 Securities and Exchange Commission v. Punch TV Studios Inc. et al](#)

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Notice of Electronic Filing

The following transaction was entered by Longo, Amy on 9/30/2021 at 12:05 PM PDT and filed on 9/30/2021

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Case Number: [2:21-cv-07787](#)

Filer: Securities and Exchange Commission

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Docket Text:

COMPLAINT No Fee Required - US Government, filed by PLAINTIFF Securities and Exchange Commission. (Attorney Amy J. Longo added to party Securities and Exchange Commission(pty:pla))(Longo, Amy)

2:21-cv-07787 Notice has been electronically mailed to:

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