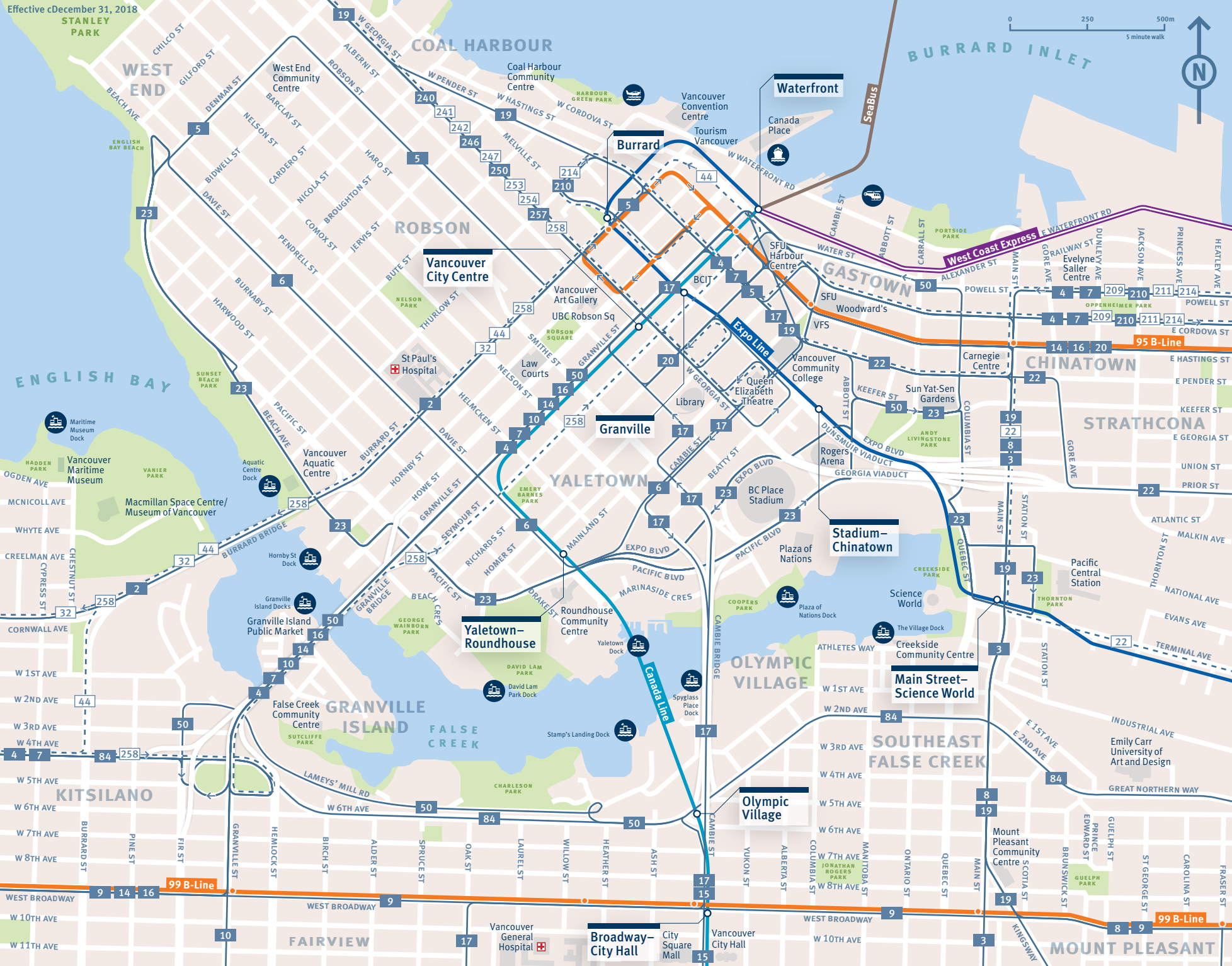Effective cDecember 31, 2018