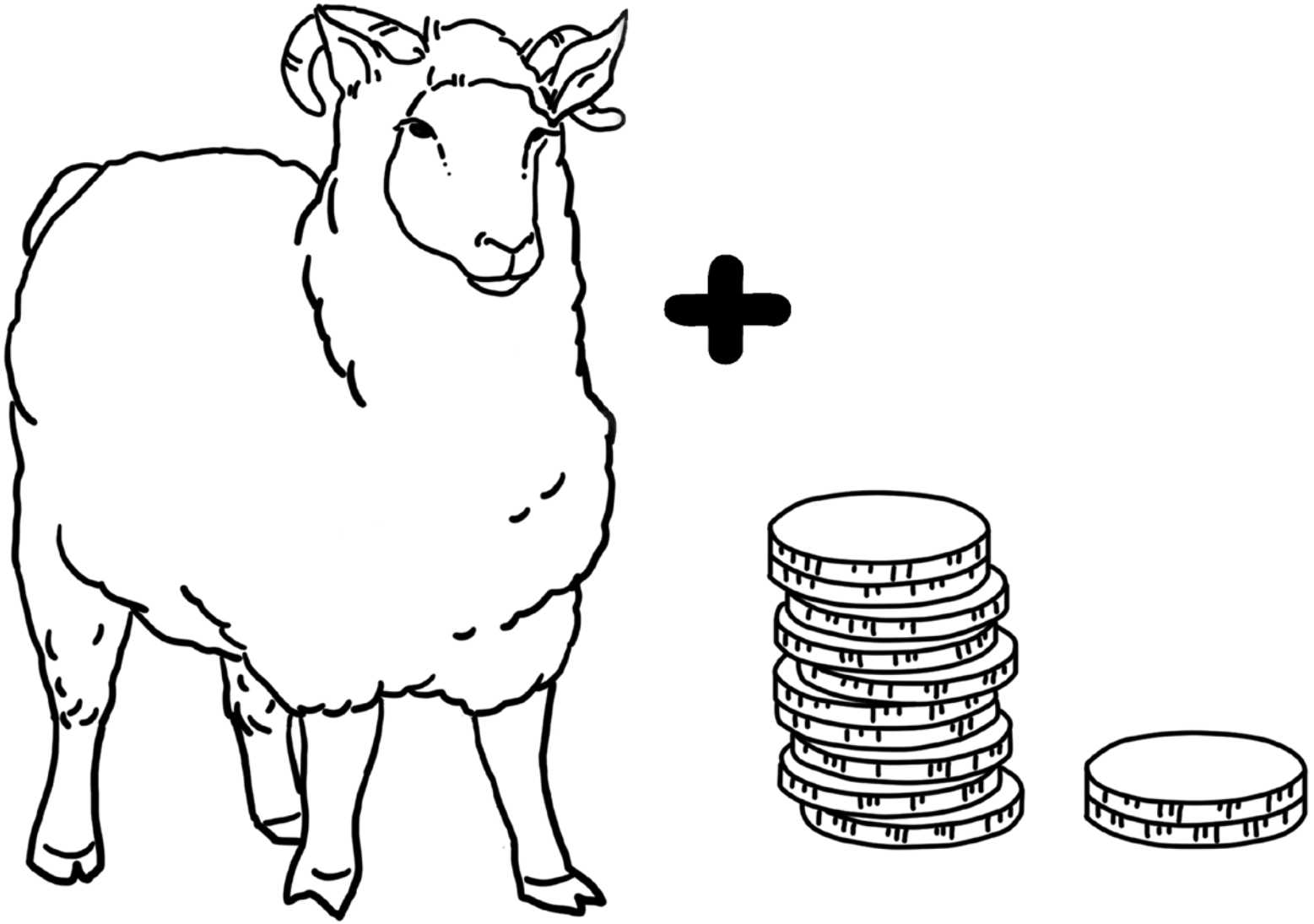GUILT OFFERING