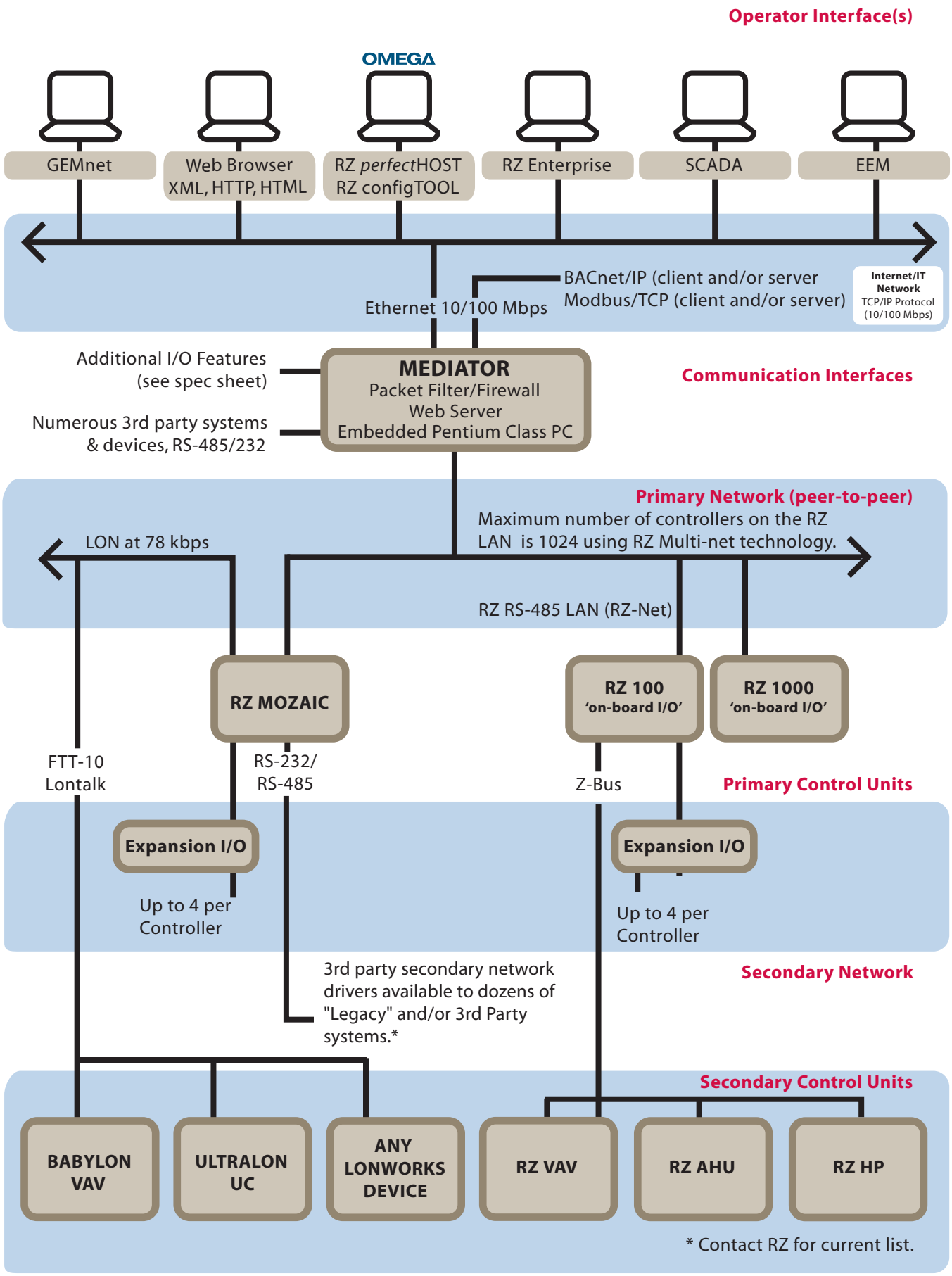RICHARDS | ZETA