IN THE MATTER OF A HEARING AND REVIEW UNDER SECTIONS 21.7 AND 127 OF THE SECURITIES ACT, R.S.O. 1990, c. S.5

AND

IN THE MATTER OF A HEARING UNDER SECTION 161 OF THE SECURITIES ACT, R.S.B.C. 1996, c. 418

AND

IN THE MATTER OF ECO ORO MINERALS CORP.

NOTICE OF APPLICATION

TAKE NOTICE that pursuant to sections 21.7 and 127 of the *Securities Act*, R.S.O. 1990, c. S.5 (the "**Ontario Act**") and section 161 of the *Securities Act*, R.S.B.C. 1996, c. 418 (the "**BC Act**"), Courtenay Wolfe ("**Wolfe**") and Harrington Global Opportunities Fund Ltd. ("**Harrington**", and together with Wolfe, the "**Concerned Shareholders**") apply for a joint hearing into the issuance of 10,600,000 common shares of Eco Oro Minerals Corp. ("**Eco Oro**" or the "**Company**") by the Company to four shareholders of Eco Oro on or about March 16, 2017 (the "**New Shares**") and the decision of the Toronto Stock Exchange (the "**TSX**") to grant conditional approval for the issuance of the New Shares (the "**TSX Decision**").

FURTHER TAKE NOTICE that the Concerned Shareholders seek the following relief:

(a) an order setting aside the TSX Decision pursuant to section 21.7 of the Ontario Act and directing that security holder approval of the issuance of the New Shares is required;

(b) a stay of the TSX Decision pursuant to sections 8(4) and 21.7(2) of the Ontario Act until such time as the Ontario Securities Commission ("**OSC**") determines the issues herein;

(c) an order permanently cease trading the New Shares pursuant to section 127(1)2 of the Ontario Act;

(d) a temporary order pursuant to section 127(5) of the Ontario Act, effective immediately, that the recipients of the New Shares be restrained from trading the New Shares or exercising any voting rights in respect of the New Shares until such time as the OSC determines the issues herein;

(e) an order permanently cease trading the New Shares pursuant to section 161(1)(b) of the BC Act;

(f) a temporary order pursuant to section 161(2) of the BC Act, effective immediately, that the recipients of the New Shares be restrained from trading the New Shares or exercising any voting rights in respect of the New Shares until such time as the British Columbia Securities Commission ("**BCSC**", and together with the OSC, the "**Commissions**") determines the issues herein;

(g) an order for an expedited hearing;

(h) an order that the issues herein be addressed in a joint hearing between the BCSC and the OSC pursuant to section 4(9) of the BC Act and Rule 13.1 of the OSC's Rules of Procedure; and

(i) such further and other relief as counsel may advise and the Commissions may deem appropriate.

2. The Concerned Shareholders intend to rely on affidavit evidence, to be sworn, and submissions (memorandum of fact and law) to be delivered in advance of the hearing.

3. The Concerned Shareholders hereby request the record of the TSX Decision and any reasons for said decision, and will file the record with the OSC.

I. OVERVIEW

4. On March 16, 2017, the Company announced that it had converted approximately US$4,721,258 of its outstanding unsecured convertible indebtedness (the "**Notes**") through the issuance of 10,600,000 common shares (defined above as the 'New Shares') to four of Eco Oro's insiders. Faced with the likely loss of their positions, the board of directors of the Company (the "**Board**") issued the New Shares eight days before the record date set by the Company primarily, if not solely, for the purpose of defeating the Concerned Shareholders in a proxy battle for control of the Board. The only

plausible explanation for the issuance of the New Shares is to augment the existing directors' support in the proxy battle and to entrench the existing Board contrary to the will of Eco Oro's shareholders. In such circumstances, the TSX erred in approving the issuance of New Shares without requiring a shareholder vote. The tactical issuance of the New Shares for no *bona fide* business purpose also constitutes an abusive transaction contrary to the public interest. Such a transaction engages the public interest mandate of both the BCSC and the OSC and necessitates the Commissions' intervention to protect Eco Oro's investors and to preserve the integrity of the capital markets.

II. SUMMARY OF FACTS

The Company

5. Eco Oro is a precious metals exploration and development company with a portfolio of projects in Colombia. Eco Oro's focus is its wholly-owned, multi-million ounce Angostura gold-silver deposit located in northeastern Colombia.

6. Eco Oro is incorporated under British Columbia's *Business Corporations Act* and its shares are traded on the TSX under the symbol "EOM". Its principal regulator is the BCSC and it is a reporting issuer in British Columbia, Ontario, Alberta and Nova Scotia.

7. Eco Oro presently has six directors: David Kay ("**Kay**"), Hubert Marleau, Mark Moseley-Williams, Kevin O'Halloran, Anna Stylianides ("**Stylianides**") and Derrick Weyrauch.

8. As at February 13, 2017, Eco Oro had 21 registered shareholders in Ontario and 10 registered shareholders in British Columbia. The registered shareholders in Ontario represented 76.38% (including CDS) of the issued and outstanding common shares of Eco Oro ("**Common Shares**") and the registered shareholders in British Columbia represented 0.03% of the Common Shares. As of February 21, 2017, there were 509 non-objecting beneficial shareholders ("**NOBOs**") located in Ontario and 139 NOBOs located in British Columbia. The NOBOs represented approximately 18% of the Common Shares, of which 39.1% were from Ontario and 19.43% were from British Columbia.

The Concerned Shareholders

9. Wolfe is a resident of Ontario, Canada and owns 1,000,000 Common Shares (approximately 0.86% of the Common Shares after taking into account the issuance of the New Shares).

10. Harrington is a legal entity in Bermuda and owns 10,139,500 Common Shares (approximately 8.68% of the Common Shares after taking into account the issuance of the New Shares).

Background to Issuance of New Shares

Eco Oro Enters into Investment Agreement

11. Eco Oro's primary asset is a pending international arbitration claim (the "**Arbitration**") against Colombia in which Eco Oro seeks to recover in excess of US$250 million. The Arbitration arises from a dispute between Eco Oro and Colombia in relation to state measures that Eco Oro asserts have destroyed the value of its investments in the Colombian mining sector and deprived Eco Oro of its rights under its principal mining title, the Angostura gold-silver deposit.

12. In order to finance the Arbitration and ancillary expenses, the Company entered into an investment agreement (the "**Investment Agreement**") on July 21, 2016 with Trexs Investments, LLC, an entity managed by Tenor Capital Management Company, L.P. ("**Tenor**"), and subsequently entered into similar arrangements with certain insiders and key shareholders, as selected at the sole discretion of the Board (the "**Participating Shareholders**", which includes Amber Capital LP, Paulson & Co. Inc. and Stylianides).

13. Pursuant to the Investment Agreement, the Company intended to issue Common Shares and Notes to Tenor in two separate tranches by way of private placement for total gross proceeds of US$14 million.

14. Under the first tranche, Eco Oro issued 10,608,225 Common Shares to Tenor in exchange for gross proceeds of US$3 million, which represented 9.99% of the then Common Shares. In connection with such issuance and pursuant to the terms of the Investment Agreement, Kay was appointed to the Board as a nominee of Tenor.

15. The second tranche of the Investment Agreement provided for two unfavourable options to obtain the balance of the monies from Tenor and the

Participating Shareholders purportedly required to fund the Arbitration: either a highly dilutive issuance of Common Shares at prices well below market or, failing shareholder approval of the dilution, secured contingent value rights ("**CVRs**") to Tenor and the Participating Shareholders, which grant them the right to receive approximately 71% of the gross proceeds of the Arbitration. Under both options, Notes in the principal amounts of US$7 million and US$2,736,362 would be issued to Tenor and the Participating Shareholders, respectively.

Shareholders Vote Against Issuance of Shares and Convertible Feature of the Notes

16. A special shareholders' meeting to seek shareholder approval primarily for the dilutive share issuance was initially scheduled for October 13, 2016. In connection with this meeting, management issued a circular, dated September 13, 2016, which omitted significant material information regarding the proposed transactions, including the identities of the Participating Shareholders and their respective subscriptions, the terms of the CVR, and management's compensation plan linked to the success of the Arbitration.

17. In response, two Eco Oro shareholders sent a letter to the BCSC, OSC and to the TSX highlighting the various ways in which Eco Oro had failed to comply with securities regulations in its communications with shareholders. The two shareholders also requested that the Company's disclosure record be corrected with respect to the Investment Agreement and that the October 13, 2016 meeting be delayed to allow shareholders the opportunity to consider the corrected record. In addition, the two Eco Oro shareholders issued a news release which indicated their and other minority shareholders' intention to vote against the resolutions approving the second tranche equity financing and related matters.

18. Only after regulatory intervention did the Board publicly release the form of CVR certificate and reveal the identities of three of the Participating Shareholders: Stylianides (the Executive Chair of the Board), Amber Capital LP and Paulson & Co. Inc. The identities of the two remaining Participating Shareholders have not been disclosed to date. The Board also postponed the special meeting of shareholders to November 3, 2016.

19. When the form of CVR certificate was finally disclosed, it became apparent that a change of control of the Company would not be possible without the

consent of Tenor, and that the CVRs would effectively allow Tenor to have full control over the Arbitration and other operations of Eco Oro. In fact, a failure to adhere to an approved budget, an unapproved change of control or the resignation, termination or even death of a key member of management on a basis not acceptable to Tenor triggers "an event of default". If an event of default occurs prior to the resolution of the Arbitration, an undisclosed percentage of the amount *claimed* by the Company in the Arbitration would become due and payable forthwith. If such percentage equals the CVR holders' share of the gross proceeds, Tenor would have the right to demand 51% of the amount claimed in the Arbitration (and other CVR holders would be entitled to demand pro rata amounts).

20. At the November 3, 2016 special meeting, 93.86% of disinterested shareholders (being shareholders other than Tenor and the Participating Shareholders) voted against the issuance of Common Shares to Tenor and the Participating Shareholders. Shareholders also voted against a resolution authorizing the Company to issue Common Shares in satisfaction of the principal amount outstanding under the Notes.

Eco Oro Issues CVRs and Notes to Tenor and Participating Shareholders

21. On November 4, 2016, an Eco Oro shareholder issued another press release advising that a request had been made to the BCSC to exercise its public interest discretion for the purpose of preventing the issuance of the CVRs, unless prior disinterested shareholder approval was obtained.

22. Eco Oro nevertheless proceeded to grant the CVRs and Notes to Tenor and the Participating Shareholders. The remaining shareholders were therefore never afforded the opportunity to vote on this transaction or participate in it.

23. The proceeds raised from Tenor and the Participating Shareholders pursuant to the Investment Agreement and related transactions with the Participating Shareholders totalled US$18,299,998.35.

24. An oppression claim was subsequently filed by two minority shareholders in the Supreme Court of British Columbia seeking an order that the Investment Agreement and the issuance of the Notes and CVRs be set aside and cancelled. The petition remains outstanding.

Management Incentive Plan

25. On January 13, 2017, Eco Oro announced its approval of a management incentive plan said to incentivize "certain key personnel" with the successful prosecution and collection of the Arbitration (the "**Management Incentive Plan**"). The implementation of the Management Incentive Plan is a requirement of the Investment Agreement. Participants in the Management Incentive Plan will be eligible for cash retention amounts up to 7% of the gross proceeds of the Arbitration. The Company has not identified the participants in the Management Incentive Plan, but they are likely to include Stylianides (a Participating Shareholder and the Executive Chair of the Board) and Mr. Moseley-Williams (a director and the CEO of the Company).

The Proxy Solicitation Battle

26. The Concerned Shareholders are presently engaged in a battle for control of the Board. The Concerned Shareholders believe that the value of the Common Shares is at grave risk under the stewardship of the Board, in that the Board has: (i) failed to develop a strategic plan that can enhance (or even preserve) shareholder value, (ii) not taken appropriate steps to conserve cash, (iii) continuously endorsed inadequate disclosure and poor standards of governance; and (v) both encouraged and overseen the destruction of significant shareholder value (including by agreeing to give away 78% of the gross proceeds of the Arbitration (Eco Oro's main asset), for relatively nominal value, to Tenor, the Participating Shareholders and those who benefit from the Management Incentive Plan). The Concerned Shareholders believe the Board must be reconstituted.

27. On February 10, 2017, the Concerned Shareholders formally requisitioned the Board to call a meeting of shareholders of Eco Oro for the purpose of reconstituting the Board by removing each of the incumbent directors and electing six new independent directors. The Requisition was made pursuant to British Columbia's *Business Corporations Act.*

28. On March 2, 2017, Eco Oro announced that it had set April 25, 2017 as the date of the requisitioned meeting (the "**Meeting**"), and March 24, 2017 as the record date for notice and voting at the Meeting (the "**Record Date**").

29. Prior to the issuance of the New Shares, Tenor and the Participating Shareholders (not including the two unknown Participating Shareholders) held a total of

40.86% of the Common Shares. The overwhelming majority of the remaining shareholders opposed the incumbent directors, as evidenced by the results of a shareholders' meeting held on November 3, 2016 in which 93.86% of the remaining shareholders voted against the resolutions put forward by the Board.

The New Shares Issuance

30. Just one week before the Record Date, the Company announced the issuance of an additional 9.98% of the Common Shares – close to the maximum permitted without disinterested shareholder approval under the rules of the TSX – to Tenor and three of the Participating Shareholders: Stylianides, Amber Capital LP and Paulson & Co. Inc. (together with Tenor, the "**New Share Recipients**"), each of whom is an insider of the Company. The TSX conditionally approved the issuance of the New Shares on March 10, 2017 without requiring a shareholder vote. The effect of the issuance of the New Shares is to give management and the New Share Recipients a decisive advantage in the upcoming battle for control of the Board.

31. Tenor is the recipient of 73.09% of the New Shares, resulting in the increase of its holdings from 9.99% to 15.72% of the Common Shares of Eco Oro. The other New Share Recipients received 26.91% of the New Shares: Stylianides (received 35,216 New Shares resulting in her overall ownership interest increasing slightly from 0.23% to 0.24%), Amber Capital LP (received 1,655,150 New Shares resulting in its overall ownership interest decreasing slightly from 19.17% to 18.84%) and Paulson & Co. Inc. (received 1,162,126 New Shares resulting in its overall ownership interest decreasing slightly from 11.47% to 11.42%).

32. The entire Board was in a conflict of interest in issuing the New Shares. Nevertheless, it would appear that no independent legal or financial advice was sought in connection with such issuance.

The Company's Justification for the New Shares

33. The Company justified the issuance of the New Shares by stating:

> Since the announcement of the initial issuance of the convertible indebtedness, Eco Oro's share price has risen by over 50%. In light of this appreciation in the trading price of Eco Oro's shares, and the Company's board of directors' (the "Board") desire to de-risk the Company's balance

> sheet and enhance its financial flexibility, the Board acted to extinguish part of the Company's outstanding debt obligations at a share price that protects future shareholder value.

34. There can be no doubt that the issuance of the New Shares has no legitimate business purpose for the following reasons:

(a) the issuance of the New Shares is inconsistent with the stated reasons by the Company for the issuance of the New Shares. In particular:

(i) the Notes, which were issued only four months ago for the stated purpose of financing the Arbitration, bear only nominal interest of 0.025%, and will not be repayable for many years. Nothing has changed with respect to the Arbitration in the intervening four months except that the Board now faces an imminent risk of being replaced;

(ii) the Company has no material indebtedness other than the Notes;

(iii) the majority of the Notes remain outstanding, along with the CVRs, and therefore the alleged risks of default remain the same;

(iv) the conversion of the Notes does not provide the Company with any additional financial flexibility. In the Company's most recent MD&A for the period ending September 30, 2016, it stated that based on the working capital at such time, it was expected that the cash position at such time would have been "sufficient to pursue a satisfactory resolution to the investment dispute and for general working capital purposes"; and

(v) the principal amount of the Notes may be converted by the Company at a conversion price equal to the trailing five day volume weighted average price of the Common Shares on the TSX (the "**Conversion Price**"). For 46 days prior to March 15, 2017, the Conversion Price has repeatedly exceeded the Conversion Price applicable to the issuance of New Shares (being approximately $0.59). In fact, 30 of these 46 days occurred prior to February 10, 2017 (the day the Concerned Shareholders issued their requisition for the Meeting);

(b) it is clear that the timing of the issuance of the New Shares immediately prior to the Record Date for the Meeting is to guarantee that the Board is successful at the Meeting; and

(c) the New Shares are solely for the benefit of those insiders of the Company who will support the Board's attempt to entrench themselves.

Effect of the New Shares

35. The issuance of the New Shares results in the New Share Recipients, each of whom is an insider of the Company, holding a minimum aggregate of 46% of the Common Shares.

36. The issuance of the New Shares is intended to (and will) defeat the will of Eco Oro's shareholders by unequivocally tipping the balance in the battle for control of the Board.

37. The Concerned Shareholders have commenced a proceeding in the Supreme Court of British Columbia in regards to the issuance of the New Shares.

The TSX Failed To Require Shareholder Approval

38. The Concerned Shareholders are not privy to the record considered by the TSX, or the reasons for the TSX Decision.

39. The TSX granted conditional approval of the issuance of the New Shares without requiring shareholder approval pursuant to section 604(a)(i) or 603 of the TSX Company Manual (the "**Manual**").

40. Section 604(a)(i) of the Manual sets out that security holder approval will generally be required if an issuance materially affects control of the listed issuer. "Materially affect control" is defined in the Manual as the ability of any security holder or combination of security holders acting together to influence the outcome of a vote of security holders.

41. There is significant circumstantial evidence that the New Share Recipients are acting together to influence the outcome of the Meeting. If the TSX had made the appropriate inquiries, there can be no doubt that it would have realized that the New Share Recipients will act together to determine the outcome of the vote requisitioned at

the Meeting. Shareholder approval should therefore generally be required pursuant to section 604(a)(i) of the Manual.

42. Section 603 gives the TSX further discretion to accept or reject a notice of the issuance of securities, or to impose conditions on the issuance. In doing so, section 603 requires the TSX to consider the effect that a transaction may have on the quality of the marketplace provided by the TSX, including factors such as the involvement of insiders or other related parties and the material effect on control of the listed issuer. The TSX failed to exercise its discretion pursuant to section 603 of the Manual or failed to properly consider the factors listed in section 603.

43. In this circumstance, and as explained below in regards to the public interest, the issuance of the New Shares is an abusive transaction engineered to deny shareholders their right to elect the directors of the Company. Prior to accepting notice of the issuance of the New Shares, the TSX was required to consider whether the transaction was abusive and if the notice was accepted, to consider whether conditions (such as a shareholder vote) should be required on the basis of the factors enumerated in section 603.

44. The Concerned Shareholders raised the foregoing issues with the TSX on March 22, 2017. To date, the TSX has not provided the Concerned Shareholders with its record, or any reasons for its decision.

III. ANALYSIS

Hearing and Review of the TSX Decision

45. The Concerned Shareholders are minority shareholders engaged in a proxy battle with the current Board. They are directly affected by the TSX Decision to allow the issuance of the New Shares without a shareholder vote and are therefore entitled to commence this application pursuant to section 21.7(1) of the Ontario Act.

46. The OSC may intervene in the TSX Decision on any of the following bases (*Re HudBay*, 32 OSCB 3733 at para. 105):

(a) the TSX has proceeded on an incorrect principle;

(b) the TSX has erred in law;

(c) the TSX has overlooked material evidence;

(d) new and compelling evidence is presented to the Commission that was not presented to the TSX; and

(e) the Commission's perception of the public interest conflicts with that of the TSX.

47. The TSX proceeded on an incorrect principle, erred in law, or overlooked material evidence in accepting the Company's notice and in failing to require security holder approval for the issuance of the New Shares.

48. In addition, the OSC can intervene in the TSX Decision if its perception of the public interest is different than that of the TSX. For the reasons described in more detail below, the OSC should intervene in the public interest to require a shareholder vote. The OSC is entitled to consider all of the information and evidence that is now before it, even if it was not available to the TSX in making its original decision.

49. The Concerned Shareholders reserve the right to supplement these grounds of review after receipt of the record and reasons for the TSX Decision.

The Issuance of the New Shares Is Contrary to the Public Interest

50. The issuance of the New Shares entirely to insiders of the Company is solely an effort to preserve the positions of the Board and serves no *bona fide* corporate objective. Eco Oro's actions are contrary to the public interest, violate the justifiable expectations of shareholders and are an abuse of the capital markets and investors.

51. Public interest jurisdiction is a necessary and important enforcement tool to assist the BCSC's mandate of protecting investors and the integrity of British Columbia's capital markets: *Re Carnes*, 2015 BCSECCOM 187 at para. 130. Likewise, section 127 of the Ontario Act provides the OSC with the jurisdiction to intervene in activities related to the Ontario capital markets when it is in the public interest to do so. The OSC has a very wide discretion in such matters: *Committee for the Equal Treatment of Asbestos Minority Shareholders v. Ontario (Securities Commission)*, 2001 SCC 37, [2001] 2 SCR 132 at para. 39.

52. Significantly, an order in the public interest does not require a finding of a specific contravention of securities laws: *Re Carnes*, 2015 BCSECCOM 187 at para. 105; *Re Red Eagle*, 2015 BCSECCOM 401 at para. 87; *Committee for the Equal Treatment of*

Asbestos Minority Shareholders v. Ontario (Securities Commission), 2001 SCC 37, [2001] 2 SCR 132 at para. 42.

53. While the Concerned Shareholders have no doubt that the conduct of Eco Oro falls within the realm of an abuse of the capital markets and investors, both Commissions have left open the possibility that an order in the public interest may also be available even where the conduct does not rise to the level of an abuse: *Re Carnes*, 2015 BCSECCOM 187; *Re Biovail Corp.* (2010), 33 OSCB 8914; *Re Hecla Mining*, 2016 BCSECCOM 359 and *Re Hecla Mining Company* (2016), 39 OSCB 8927 at paras. 163-164.

54. In any event, the Concerned Shareholders submit that the issuance of the New Shares is an abusive transaction contrary to the public interest. The shareholder right to vote in the election of directors is a sacrosanct right. To allow the incumbent directors to engage in transactions orchestrated primarily, if not solely, to deny shareholders that right is contrary to the public interest.

55. In this instance, there is no reasonable basis for the issuance of the New Shares except to frustrate the ability of shareholders to choose the Board at the Meeting. The inescapable conclusion is that the New Shares are intended to defeat the will of shareholders in the proxy battle described herein. Its only purpose is to entrench the existing Board and thwart the efforts of the Concerned Shareholders to persuade shareholders that the Board's actions described above are contrary to the Company's long-term interests and therefore the entire Board should be replaced. The issuance of the New Shares improperly removes the right of shareholders to elect the Board and eliminates any chance that the Concerned Shareholders will be successful in the proxy battle. The Commission's intervention is required to protect the public interest and to preserve public confidence in the capital markets.

An Expedited Hearing and Temporary Orders Are Required

56. Given the date for the Meeting (April 25, 2017) set by the Company, the Concerned Shareholders seek a stay of the TSX Decision pursuant to sections 8(4) and 21.7(2) of the Ontario Act, temporary cease trader orders pursuant to section 127(5) of the Ontario Act and section 161(2) of the BC Act, and an expedited hearing. In the absence of a stay and/or temporary cease trade order, the New Shares will dictate the

outcome of the proxy battle and shareholders will be deprived of the opportunity to democratically elect Eco Oro's directors.

Joint Hearing Between the British Columbia and Ontario Commissions

57. Pursuant to section 4(9) of the BC Act and section 2.12 of BC Policy 15-601 and Rule 13.1 of the OSC's Rules of Procedure, the Concerned Shareholders seek a hearing of the foregoing issues before the BCSC in conjunction with the OSC. While Eco Oro's principal regulator is the BCSC, an application for review of the TSX Decision must be brought before the OSC and the vast majority of Eco Oro's registered shareholders and NOBOs are located in Ontario. Of the identifiable shareholders, 76.38% (including CDS) of the Common Shares are held by persons in Ontario. Accordingly, this application seeks to protect investors, including Wolfe, who are primarily in Ontario.

58. The Concerned Shareholders further submit that the egregious actions described above make it in the public interest for securities administrators in both jurisdictions to conduct a joint or simultaneous hearing and consider the public interest issues raised at the same time. This application raises issues that are novel and of significant importance to the parties in this proceeding and will influence the conduct of other market participants in the future.

59. As recognized by both Commissions in *Re Hecla Mining*, 2016 BCSECCOM 359 at para. 12, such an approach strives to achieve consistency in decision-making.

IV. CONCLUSION

60. For the foregoing reasons, the Concerned Shareholders submit that the protection of the public interest requires that a hearing be convened by both Commissions at the earliest opportunity to consider the TSX Decision and the issuance of the New Shares. The Commissions should exercise their broad unfettered power to move quickly to intervene where actions contrary to the public interest are unfolding.

DATED at Toronto, Ontario, this 27 day of March, 2017

McMILLAN LLP

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