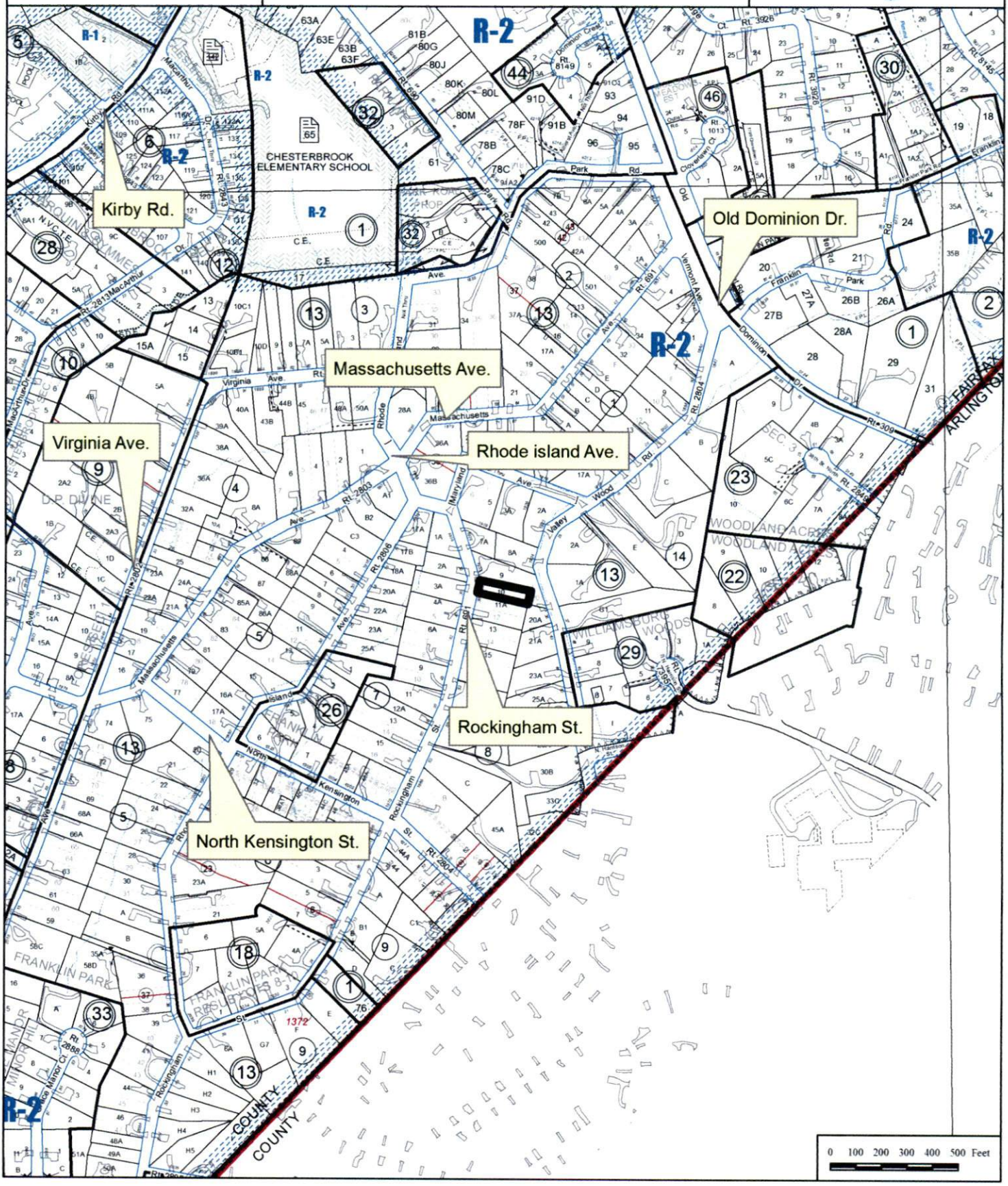
Variance Application

VC 2018-DR-013

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