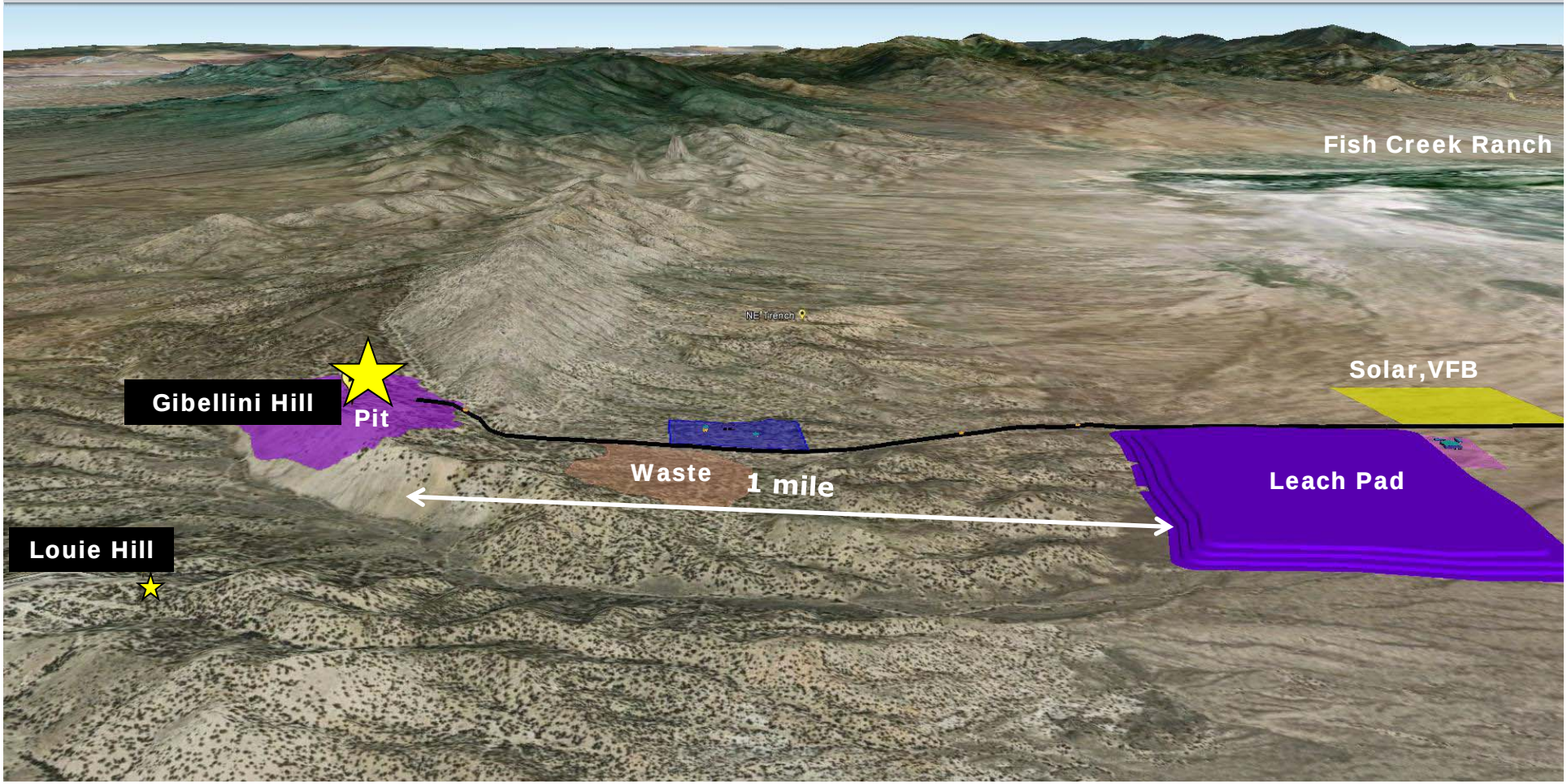GIBELLINI HILL OPERATING PLAN