Roman temple complex in Greenwich Park? Part 1

When a workman rammed an iron bar into a mound in Greenwich Park in February 1902, he hit unexpected treasure in the prosaic form of tesserae and mortar -- "undoubtedly a Roman villa" proclaimed the local press. His supervisor, A D Webster, arranged for extensive excavations. Evidence for a high status Roman building was revealed in 1902, but, even after further excavations in the 1920s and 1970s, its identification, first as a villa, later as a Romano-Celtic temple, remained tentative. Excavations in 1999 by the Museum of London and Birkbeck College with Channel 4's Time Team, have exposed new structural evidence on the mound as well as the remains of a further, if elusive, complex of features to the east, both of which appear to substantiate the temple hypothesis. New finds on this exceptional site include not only a rare inscription, bringing the site total to five, but surface.5 also more than 100 coins, and fragments of procuratorial stamped tile. This interim report on

Excavation history

over the 20th century.

Enclosed by Humphrey Duke of Gloucester in the 15th century, adopted as a favourite Tudor royal resort in the 16th century, and landscaped under Charles II in the 17th, Greenwich Park has largely escaped major intrusions. A few buildings, such as Duke Humphrey's defensive tower and the Greenwich Royal Observatory on the same site, plus leisure and wartime installations, occasionally dotted the parkland. Gravel extraction, the reservoirs and a network of underground water conduits have also left their mark. Apart from the 1784 incursions into the large Anglo Saxon burial group in the west (Fig. 1), however, the Park avoided the worst excesses of the antiquaries.2 Around the turn of the 20th century, the question of the route of Watling Street from the Kent coast to London focused new interest on Greenwich

the 1999 fieldwork also outlines the excavation

the archaeological and finds evidence collected

history, and considers possible interpretations of

Becky Wallower

Park. Lying directly on a line projected from known remains of the Roman road (Fig. 1), it offered almost virgin territory in the search for the lost course of the road towards Southwark. In 1902 Park Superintendent A D Webster led a work group out into the Park, hoping to verify his theories on Watling Street.3 One site probed by means of iron bars was a prominent mound, sometimes known as Queen Elizabeth's Bower, topped by a circle of trees. Recognising as Roman the material unearthed there by a labourer, Webster involved a local antiquarian, Herbert Jones FSA, who had previously excavated at Silchester. A trial trench, apparently 18ft by just 1.5ft wide, produced further building material and pottery.4 Jones seems to have guided the excavation of a further trench over the mound, a series of trenches on the southern flank, and eventually the wholesale stripping of the mound

The Roman "villa" attracted both press attention and visitors over the summer months. Railings were erected to protect the excavations, which were left exposed through the winter. In 1903, after further minor excavations, the trenches were filled in, apparently leaving a small patch of tesserae enclosed in railings for posterity (at TQ 3929 7742, approximately 44m above OD).

Jones and Webster's efforts produced remains of three floors, one tesselated and lying three feet higher than the other two (at least one of which was surfaced with opus signinum), and a six foot six stretch of ragstone walling. Their finds were prodigious and overwhelmingly Roman: over 350 coins ranging from Mark Antony to Honorius, four inscriptions on marble and sandstone, the right arm of a fine limestone statue, fragments of two rare carved ivory pieces, quantities of pottery, stone and ceramic building material, painted wall plaster, a key, a fine chain, a hipposandal and various other metal artefacts.7 It is likely that most of these would have come from ditches, pits and robber trenches, which were largely unidentified as such at the time.

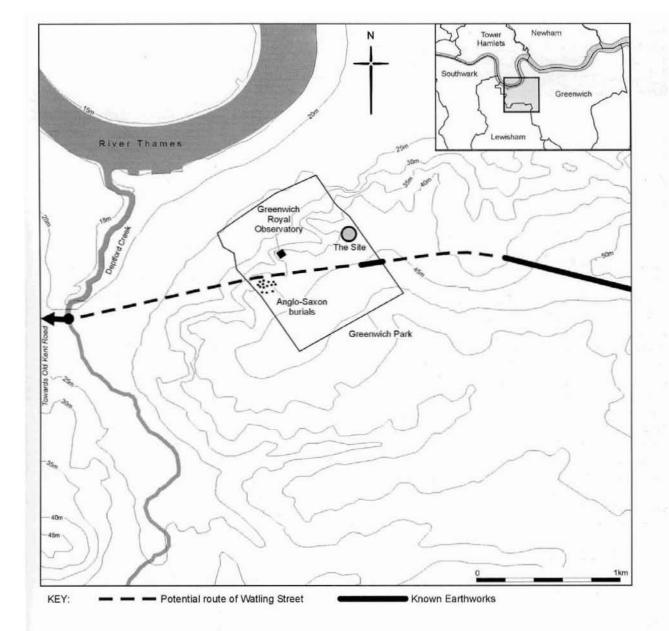


Fig 1: site location plan (Peter Hart-Allison, MoLAS)

Two less fortunate products of the 1902/3 excavations were inadequate records and inconclusive data.⁸ Webster's account describes the site in ambiguous terms and catalogues the finds to some extent. Jones, in two articles and his address to the 'Archaeological Institute' (a note of which was published in 1902)⁹, describes something of the techniques employed and provides the only plan, with an orientation map that relates only vaguely to the site.¹⁰ Apart from

these sources and a notebook (now apparently lost) in Jones's hand listing the finds, ¹¹ no other notes, stratigraphical records, drawings or details appear to have survived. The finds assemblage is now also much diminished. ¹²

The inconclusive and incomplete nature of the record seems to have prompted further excavation in 1924/5 and 1927.¹³ This work entailed trenches on the east and north flanks of the mound, but seemingly produced no results, and again left

almost no records. Other archaeological activity in the Park, notably in 1906 (focusing mainly on the area around Vanbrugh gate, and directed by Jones) and 1911, may also have involved the mound area, but here too, records are poor.¹⁴

Nevertheless, it seems clear from the evidence presented in 1902-3 that a significant, high status building (or buildings) stood on the mound, with occupation extending throughout the Roman period. Webster imaginatively conjectured that the large number of coins might point to "a pay place for soldiers, a canteen, or the residence of an officer connected with the Mint",15 but the site was generally referred to as a villa for some years. In 1928, Wheeler postulated, on the basis of finds and epigraphic evidence, that the building could be a shrine. 16 This theory was adopted by Lewis in 1966, who listed finds such as the almost 400 coins, the inscriptions and the statue, in nominating the site as a temple of uncertain form. 17 Other writers, notably Professor Haverfield, have used the evidence of the mound remains as corroboration of theories that a major settlement, namely the 'lost' posting station of Noviomagus listed in the Antonine Itinerary, existed in the area.18 This now seems very doubtful: Noviomagus is listed in Iter II at some five miles farther from London than Greenwich, and other evidence for Roman activity in the immediate vicinity of Greenwich Park is limited to some cremation burials on Blackheath, a few isolated finds of coins, building material and pottery, a bronze lamp from the Thames and a bronze bowl from the Park.19

1978/9 excavations

In the 1960s and '70s, age and Dutch Elm Disease claimed the large trees surmounting the mound (apparently planted mid-17th century). The Southwark and Lambeth Archaeological Excavation Committee was asked by the Department of the Environment in 1978 to investigate whether it would be possible to replant trees, by determining what Roman levels had survived the tree planting and removal, and relating these, if possible, to earlier discoveries. As the excavation (site code GP78), led by Harvey Sheldon and Brian Yule, was exploratory in nature, any structures exposed were to be left undisturbed. Three trenches were opened, mainly

to the south of the mound, in the area where it was thought the floors unearthed in the earlier excavations would lie, near the patch of tesserae which was presumed to have remained *in situ* since 1903 (Fig. 2).

Amongst severe disturbance by tree planting/ removal, root action, animal burrows, erosion, and late pits and trenches, significant new evidence was found. Two phases of building were noted, and, south of them, a metalled surface, several gullies and a deep natural channel. Based on the backfill evidence and stratigraphical relationships, the excavators posited that the Phase 1 structure was of timber and clay on flint footings (Fig. 2, X), and that it dated to around the end of the 1st century. This structure had been replaced, in the 3rd century or later, by a slightly larger square or rectangular building with a raised tesselated floor. The robbed-out wall of this Phase 2 building was traced running east-west for about 10m (Fig. 2, Y), returning to the north from the south-west corner for c. 2m.

Sheldon and Yule concluded that the later structure and the railed-in patch of tesserae were part of the same structure. They argued on the basis of the setting, finds and raised rectangular architecture that the most likely form of building was that of a Romano-Celtic temple, with its entrance to the east. The newly discovered wall and floor were suggested as the south side of the ambulatory, the 1902 tesserae patch as flooring of the cella and two of the gullies as possibly belonging to a temenos boundary. No trace of the previously uncovered floors or walls was revealed, but it was thought that some gullies and disturbance could have been evidence of earlier excavations.

1999 excavations

Channel 4's Time Team came to Greenwich in 1999 with the aim of establishing the location, function, extent, and the date and duration of use of the structures discovered in 1902.²¹ The dig (site code GMA99) was undertaken in the customary three days, and organised jointly with Hedley Swain, Museum of London, and Harvey Sheldon, Birkbeck College; archaeologists from MoLAS and students from Birkbeck College supplemented the Time Team principals.

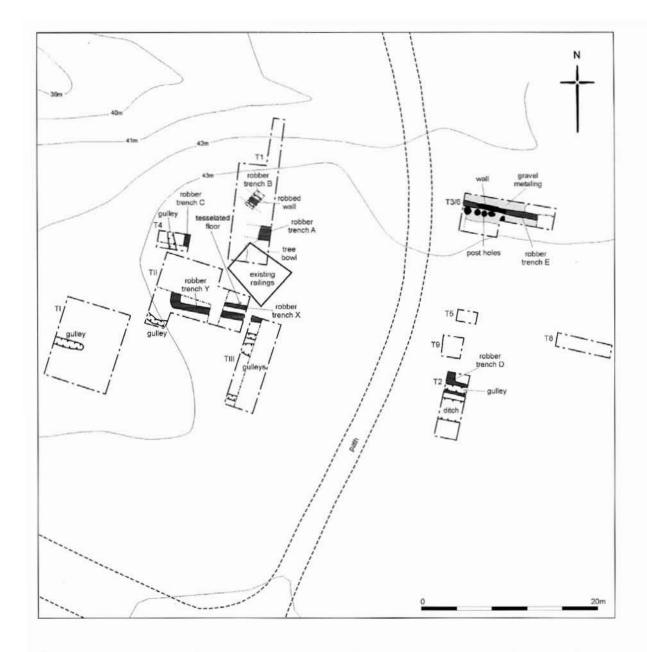


Fig 2: plan of trenches and features from 1978/79 (trenches I to III) and 1999 excavations (trenches 1 to 9) (Peter Hart-Allison, MoLAS)

On the evidence of parch marks, previous excavations and new geophysical surveys, eight trenches were opened (Fig. 2): three of them (5, 8 and 9) were only briefly examined as no structural features were obvious, and another (7) was not recorded. Because of the fragmentary and limited nature of the three day excavation; an incomplete stratigraphical record; and the complex, disturbed nature of the contexts, it has not been possible to

phase the site. The evidence does, however, indicate site usage -- probably continuous -- from about AD 100 to 400, and confirms several phases of activity.

Mound area

Trenches 1 and 4 were positioned on the mound, the location of the 1902 excavations. In the south of Trench 1 near the patch of exposed tesserae, a massive robbed-out foundation trench (Fig. 2, A) was revealed next to a large tree bole. Although only small fragments of stone remained in the bottom of the trench, its dimensions -- at least 1.9m wide and 1.2m deep -- indicated a substantial masonry structure had stood there. As well as painted plaster, mortar, tesserae and other types of building material, the fill included 37 coins of late 3rd to late 4th century dates, providing an earliest robbing date of c. AD 400. To the north-east of this structure, possible evidence of a further wall (Fig. 2, B) was found, mostly robbed out, but comprising a length of disturbed flint and mortar remains, apparently running at an angle of about 30° to A. No temporal relationship between the two structures could be determined.

Trench 4, laid out to investigate further evidence of the western wall seen in 1978/9, yielded another robber trench (Fig. 2, C). Its width extended beyond the limit of excavation, but it was at least 0.70m deep, and a few mortared ragstone blocks remained in silt at the base. It aligned with the north-south segment of the previously discovered robber trench Y, and its base was at about the same level (+42.50m OD). Make-up layers appeared to have been laid to the west of robber trench C where the ground level dips away. A disturbed layer above the robber trench contained one of the site's key finds: a

marble tablet inscribed with three lines of text (Fig. 3, GMA99).

Extended complex

Excavations to the east of the mound produced less disturbed features and deposits, and evidence of a larger complex of buildings and other features. The earliest solidly dated feature was found in Trench 2 (Fig. 2). Here the backfill of a section of a substantial v-shaped ditch, at least 1.9m deep and c. 5 m wide, produced animal bone, early building material and a good collection of pottery, including samian, Highgate and Verulamium wares. Pottery dates of AD 70-100 indicate that the ditch went out of use early in the 2nd century. A gravel surface overlying the backfilled ditch was cut by an L-shaped robber trench (Fig 2, D), at least 0.68m deep and more than 1m wide. On the northern side of D was a substantial deposit of building material, including some fine painted plaster with masonry impressions in the mortar, which was interpreted as being structural collapse against the then upstanding wall D. The painted plaster and tile date the fallen wall to the early 2nd century. A shallow gully of unknown function ran along the surface of robber trench D.

Trench 3, 15m north of Trench 2 and extended by Trench 6, produced the remains of yet another, mostly robbed out, structure (Fig. 2, E) a few

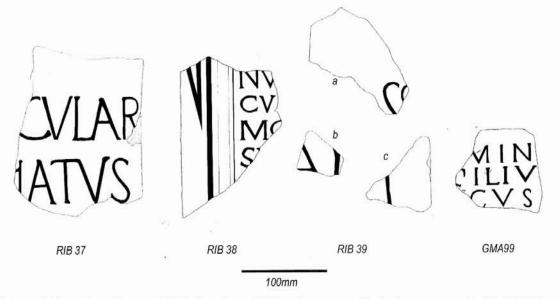


Fig 3: inscriptions from Greenwich Park: relevant RIB references refer to those excavated in 1902/3, and GMA99 to the inscription from 1999 (all illustrations: author)

centimetres beneath the surface. Gravel metalling covered the ground surface either side of the one remaining course of this east-west ragstone wall, and an unexcavated feature running north-south (apparently another robber trench) abutted the remains. Cutting this presumed north-south robber trench was a post hole, apparently one of a series of four or five with centres c. 0.75m away from and on the same orientation as wall E. Two fragments of tegula, found in two separate post holes, appear to be part of the same tile, and are marked with complementary portions of the stamp PPBRLON (Fig. 4).²²

Trench 5 was laid out to investigate geophysical anomalies, and Trench 9 to locate any northerly extension of wall D: neither provided evidence of cut features or deposits under the topsoil. Trench 8, also on the trail of magnetic anomalies, revealed a substantial stretch of metalled surface, possibly a road or pathway. Multiple layers indicated that it had been repaired or resurfaced several times, but its dimensions are unknown.

Finds

Finds from the 1999 excavations, particularly the stratified building material, pottery and coins, have added important pieces and worthwhile data to an already noteworthy record. To paint a more complete picture, the results of a re-examination of some of the 1902 objects and building material, and the analysis of 1978 coins, have been included in the following review of the 1999 artefacts.²³

The 177kg of ceramic building material, stone and wall plaster recovered in 1999 included 15 tile types, 981 tesserae and 283 fragments of painted and decorated wall plaster. The high quality plaster, mainly from Trenches 1 and 2 with small collections from 3/6 and 4, has been dated to the 1st and 2nd centuries. Most of the ceramic building material (74%) probably originated from kilns north-west of London along Watling Street, before about AD 160. Another 18.3% was manufactured in tileries operating up to about AD 120, and only 7.5% in tileries in operation for differing periods between AD 140 and 300. Sources other than London include Radlett, Herts, a kiln on the south coast and Kent and Surrey works.24 Early Kent fabrics were found in Trench 1, and later, 3rd century, fabrics in Trench 3/6.

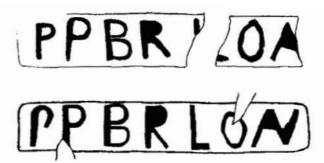


Fig 4: procuratorial stamped tile excavated in 1999 (above, author), with composite example of Die 5 (from RIB).

The material from the 1902/3 dig is known to have been similar,²⁵ but re-examination of the small surviving corpus has revealed some nearly complete *lydion* bricks (large rectangular bricks used as bonding courses in masonry walls), portions of two rare circular *bessalis* bricks, and several combed flue tiles. Such *bessales* and flue tiles, of Radlett fabrics, are comparatively rare in the City, but are similar to types found in the early phases of two Roman public buildings (at Winchester Palace and 15-23 Southwark Street) and several other 1st-century sites in Southwark.

The presence of round bessales and flue tile would normally indicate the presence of a hypocaust system. No evidence for this has been noted in any of the excavations, however, and it seems possible that the material was imported from other sites, as rubble for wall building. In the case of flue tiles, an alternative use might be in window/door construction for lightness, 26 and in the case of the circular bessales, one of which was completely covered in mortar, it is conceivable that they could have been adapted as small columns or bases for sculpture.27

Among the eleven types of stone found in 1999, Kentish ragstone predominated. Oolitic limestone was the principal medium for worked fragments, with the Carrara marble of the inscribed slab representing the most exotic. 28 Several interesting pieces of stone from 1902 survive. A fragment of sandstone, briefly reunited with the 1902 inscriptions held by the British Museum, is clearly the same stone as the inscription (Fig. 3, RIB 37), and, as both are affected by fire, likely to be part of the same object. This is of a scale and thickness great enough to be a possible altar or statue base, rather than a wall plaque. Two pieces of oolite

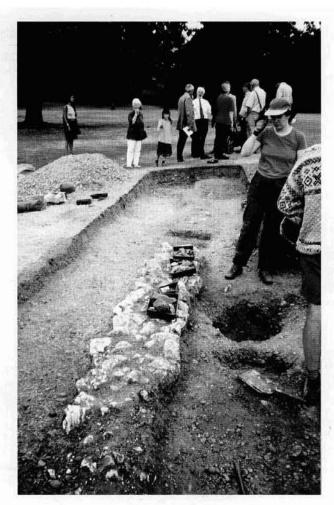


Fig 5: remains of a largely robbed-out wall found in Trench 3/6. The procuratorial tile was recovered from two of the post holes next to the wall.

from 1902 have proven to be fragments of one or two column bases. The diameter for both is approximately 0.68-0.70m, and analogy with similar torus mouldings at Fishbourne would give a column shaft of c. 0.56m and a height of 16.1 Roman feet, or 4.76m,29 a size appropriate to a portico support or even a free standing column. An examination of the fragments of inscribed stone from 1902/3 appears to show that, contrary to RIB 37-39, there may be four, not three, separate inscriptions.30 With the 1999 discovery, therefore, Greenwich Park may now boast five inscriptions, making this an extremely rare site in south-eastern Britain. The inscription from 1999 (Fig. 3, GMA99) has been posited as a dedication to [NU]MIN[I AUG] or [NU]MIN[IBUS AUGG] -- the spirit(s) of the emperor(s) -- by de la

Bedoyere.³¹ The other two lines of this example are perhaps the nomen and cognomen of the dedicator -- Harvey Sheldon suggests the name may have been Maecilius Fuscus, a governor (probably AD 238-241 or 244) whose name is found on a dedication inscription for the rebuilding of the headquarters at Lanchester.³² The 1902 sandstone fragment has NU as the first letters in one line (Fig. 3, RIB 37) and may be a similar dedication.

The PPBRLON stamped tile (Fig. 4) is the second important individual find from GMA99. The stamp is thought to signify the official tilery of the procurators, whose office, based in London, was charged with imperial property and finances in the province. The letters are interpreted as P[ROCURATORES] P[ROVINCIAE] BR[ITANNIAE] LON[DINI]. The tileries appear to have been centred around Watling Street kiln sites north-west of London, source of the majority of tiles from Greenwich Park. The proportion of output which was stamped is unknown, but Betts notes that fewer than 1% tiles excavated in London are stamped, so they are rare finds.33 Thirteen different stamps are known (some only or also related to mortarium stamps). Die 5 examples such as the Greenwich specimen, other instances of which have been found around the amphitheatre area of London, are some of the least common. Evidence shows that procuratorial tiles were in primary use only between about AD 70 and 120, and most of the c. 200 stamped tiles excavated come from sites related to presumed public buildings of the 1st and 2nd centuries in the City of London and Southwark, such as the Huggin Hill baths, St. Peter's Hill complex, "palace", forum/basilica, fort and amphitheatre.34 Complete tegulae were also recently excavated from the Gresham Street eastern well, dated provisionally to the early 2nd century.35 Other examples have been recovered from points in the upper Walbrook valley, and a few outliers have been found at Westminster (one fragment), Barking (two fragments), and possibly Saunderton Villa, Bucks (one fragment). These are without known official status, so it is possible the tiles were also sold for private buildings.36

In the next issue, Part 2 will cover further finds and discuss the results from the Greenwich Park excavations.

Acknowledgements

The excavation organisers are grateful to the Royal Parks for granting permission to dig in Greenwich Park. The funding and assistance from Time Team for post-excavation work is greatly appreciated. Among those who have generously contributed time and expertise to unravelling the complexities of the history of the site and its finds are Julian Watson and Frances Ward of the Greenwich Local History Library, Dr Ralph Jackson of the British Museum, Beverley Burford and Chris Ford of the Greenwich Borough Museum, Ian Nichols of the Royal Naval College, Penny MacConnoran of MoLSS and Katie Hirst, former Time Team archaeologist. Thanks are due to the MoLSS specialists for their reports,

especially to Sue Pringle and Robin Symonds for additional input on building material and pottery. I am also grateful to Julian Bowsher of MoLAS (and chair of the Greenwich History Society) for his coin reports on the site and a briefing on local Greenwich archaeology. Martin Millett's contributions on interpretation of the site have also been helpful. I particularly appreciate the good will and guidance of Hedley Swain. Museum of London, and Harvey Sheldon, Birkbeck College, who provided the opportunity to study the site in depth and prepare the archive report. The initial work for this article was completed for my dissertation for a Birkbeck Diploma in Field Archaeology. Any errors in this article are mine.

- 1. 'Roman Remains in Greenwich Park' Kentish Mercury 7 February 1902.
- Royal Commission on the Historical Monuments of England 1994 Greenwich Park, an Archaeological Survey Report for the National Monuments Record Part 2.
- 3. A. D. Webster 1902 Greenwich Park: Its History and Associations.
- 4. 'Roman Remains in Greenwich Park' Blackheath Local Guide and District Advertiser 1 March 1902.
- 5. H. Jones MS Address to the Archaeological Institute [presumably the Royal Archaeological Institute -- see fn 9] (Greenwich Local History Library)1902: Jones notes "Several trenches were run upon the top of the Hill but the results not having been found very satisfactory chiefly in consequence of the confined space and of the necessity of almost immediately filling them up, which arose from the exigencies of a public London Park, it was decided to clear and turnover the whole of the soil of the site leaving open anything found in situ but filling in again as quickly as might be the unoccupied ground."
- 6. See e.g. Kentish Mercury 21 March 1902, Daily Graphic 31 March 1902, Lewisham Borough News 27 February 1902, and Trans Woolwich District Antiquarian Soc 1902.
- 7. Op cit fn 3.
- 8. It is not even clear who supervised the work: Jones credits Webster with directing the excavations in H. Jones 'Roman Remains in Greenwich Park' Home Counties Magazine Vol 5 (1903) 223-226; but Webster (op cit fin 3) acknowledges Jones' assistance and later writers tend to credit Jones with the work. Elliston Erwood, excavator in 1916 of Charlton Roman settlement and a later member of the Antiquarian Society founded by Jones, held Jones "in the main responsible" for the excavations, and decried his lack of attention "to the important matter of stratification" in F. C. Elliston Erwood 'Roman Remains from Greenwich Park' Trans Greenwich Lewisham Antiquarian Soc 3, no 1, (1924) 62-75.
- 9. The Archaeological Journal, Proceedings, June 4th 1902. Vol LIX, 2nd ser. vol ix (1902) 210; see fn 5.
- 10. Jones op cit fn 8, with article pp 49-55 same vol
- 11. Recorded by F.C. Elliston Erwood op cit fn 8, 62.
- 12. Inscriptions and carved ivory pieces have been in the British Museum since 1906. Other finds were placed in the Borough Museum in Plumstead in 1964, having been stored at the borough library, Charlton House and other locations over the years. Much was apparently lost, looted or destroyed during WWII when Charlton House was bombed (J Watson, pers. comm.).
- 13. J. W. Stone 'Antiquarian Notes' op cit fn 8, no 2 (1925), 45-6; H. W. Ord 'The History of the Greenwich Antiquarian Society' ibid, no 3 (1927), 128-132.
- 14. Scant mentions are found in the Minutes of the Greenwich and Lewisham Antiq Soc MS, and in Antiquarian Notes sections of the Society's Transactions, vol I and III.
- 15. Op cit fn 3, 71.
- RCHM (England) An inventory of the Historical Monuments in London Vol III Roman London. (1928) Wheeler apparently accepted evidence in Ephemeris Epig. 1X 992 that one of the inscriptions included the letters CULAP,

which could be interpreted as Aesculapio RIB, and recent inspection by the author, Hedley Swain and Dr Ralph Jackson of the British Museum, show the last letter as a convincing R, not P. The cast in the Greenwich Borough Museum may be the source of the confusion, as the letter there appears more P-like.

- 17. M. J. T. Lewis Temples in Roman Britain (1966) 126.
- 18 B. Platts 'A Lost City of South London' Country Life (1969) 1236-38.
- 19. Many previously reported finds, some of which appeared on early OS maps, have proven to be post-medieval objects or the result of confusion. Recent unpublished excavations in Greenwich have only produced stray fragments of Roman pottery (J. Watson and J. M. C. Bowsher, pers. comm.).
- 20. H. Sheldon and B. Yule 'Excavations in Greenwich Park 1978-9' London Archaeol 3, no 12 (1979) 311-317.
- Time Team Evaluation of a Roman Site in the Royal Park at Greenwich: Project Design (unpublished 1999); see also
 H. Swain and H. Sheldon 'Roman Greenwich' Current Archaeol 14, no 167, 440; H. Swain and H. Sheldon
 'Romans in Greenwich' Minerva 11, 3, 6.
- 22. Hassall, who examined four fragments, including the two stamped ones, concludes that the pieces almost certainly fit together, although flaked edges make the join imperfect. R. S. O. Tomlin and M. W. C. Hassall 'Inscriptions' Britannia 31 (2000) 439-446.
- 23. The surviving archive at Greenwich Borough Museum was examined by the author and Sue Pringle. The collection was last catalogued when it was accessioned after the amalgamation of boroughs in 1964 (Beverley Burford, pers. comm.). Large quantities of pottery appear to be missing. Apart from the coins, none of the material from the 1978/9 excavation was available for inspection at the time of writing as it was in storage outside London during the refurbishment of the archive. Only the coins have been assessed by specialists.
- 24. S. Pringle Assessment of the ceramic building material and painted wall plaster from Greenwich Park (GMA99) unpublished MoLSS specialist report, 2001.
- 25. Op cit fn 3. The bricks in the Plumstead Museum are labelled as tile, accounting for Webster's assertion that "exceptionally heavy roofing tiles" were found.
- 26. Op cit fn 17, 43.
- 27. The only use in situ in London is as pilae in the hypocaust at 15-30 Southwark Street, (S. Pringle, pers. comm.).
- 28. S. Pringle, pers comm.
- 29. S. Pringle Greenwich Park Building Materials unpublished MoLSS specialist report, 2001.
- 30. RIB inscription 39B is 2-3mm thinner than 39A and C, closer to the thickness of the uninscribed fragments in the archive. A total of four inscriptions in fact accords with Jones' description in his 1902 address (*op cit*, fn 5). All the fragments in the British Museum except RIB 37 are of Carrara marble (S Pringle, *pers. comm.*).
- 31. G. de la Bédoyère Companion to Roman Britain (1999) 182; accepted as feasible by Hassall op cit fn 22.
- 32. RIB 1092; H. Sheldon, pers. comm.
- 33. I. M. Betts 'Procuratorial Tile Stamps from London' Britannia 26 (1995) 207-229.
- 34. Martin Millett cautions against the association of PPBR tiles as a marker of public buildings as sometimes buildings have been presumed to be public by virtue of the presence of stamped tiles (M Millett, pers. comm.).
- 35. S. Pringle, pers. comm.
- 36. Op cit fn 33.

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