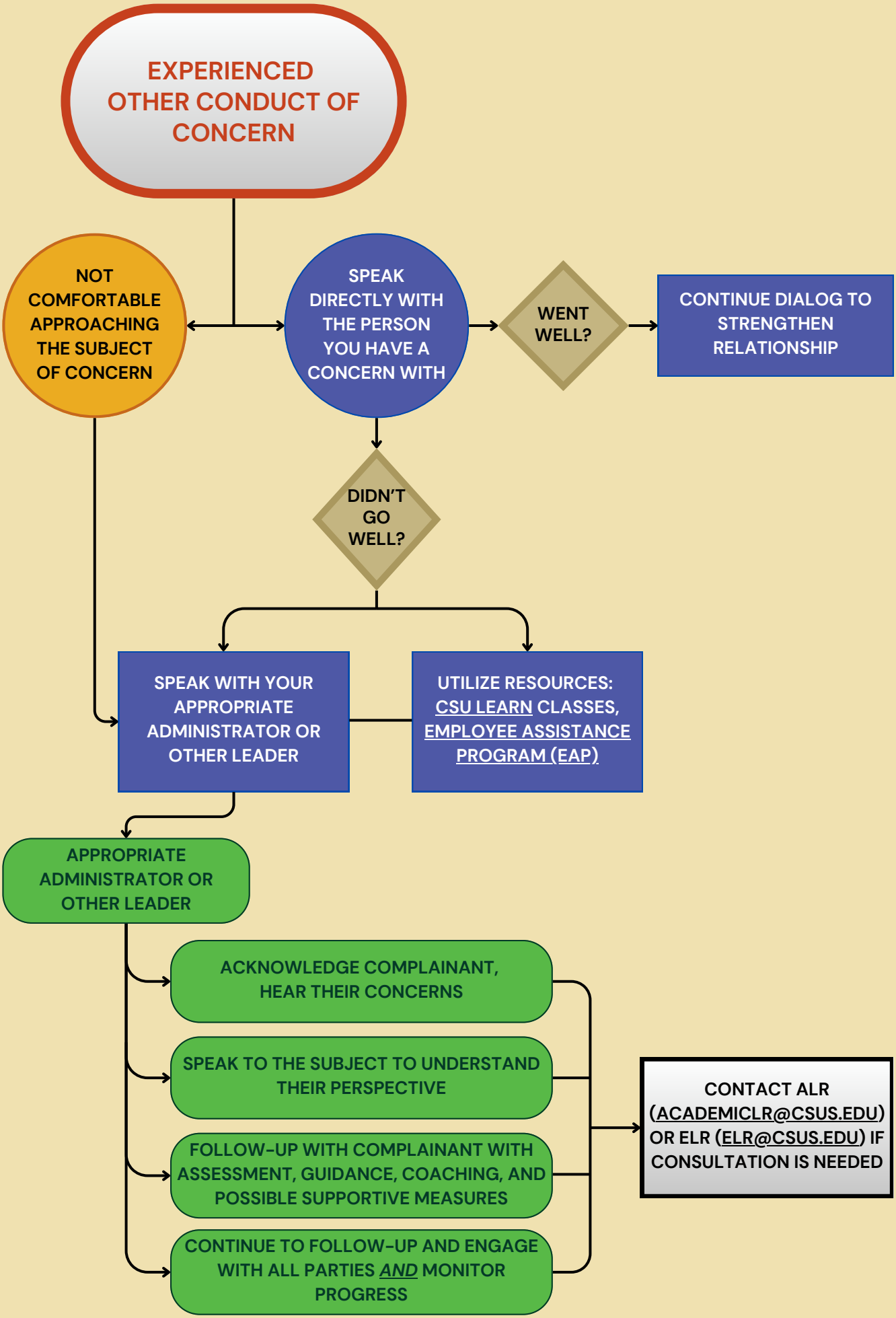OTHER CONDUCT OF CONCERN (OCC)