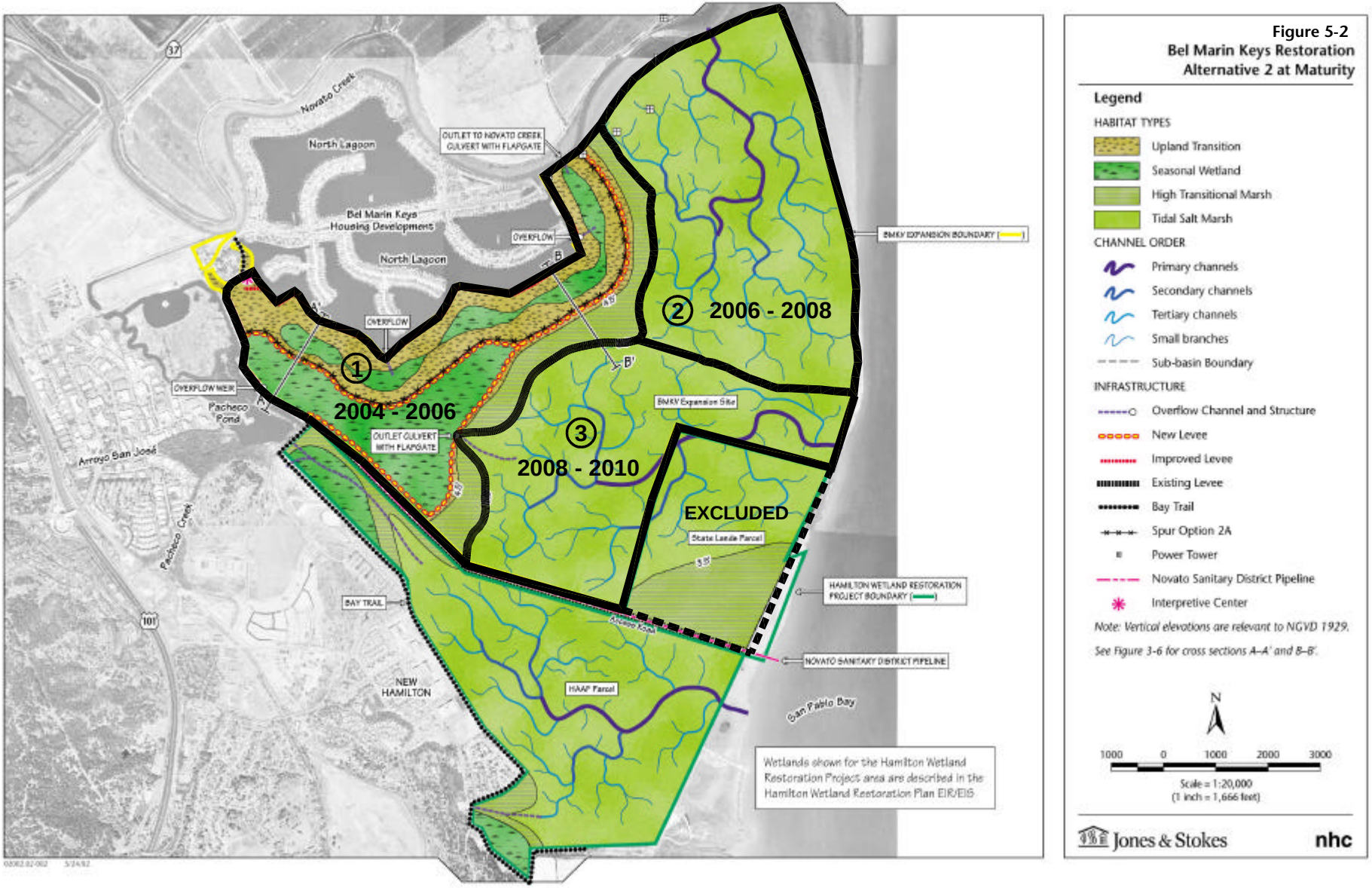B. NO TRANSFER OF BRAC OR COMPLETION OF FUDS