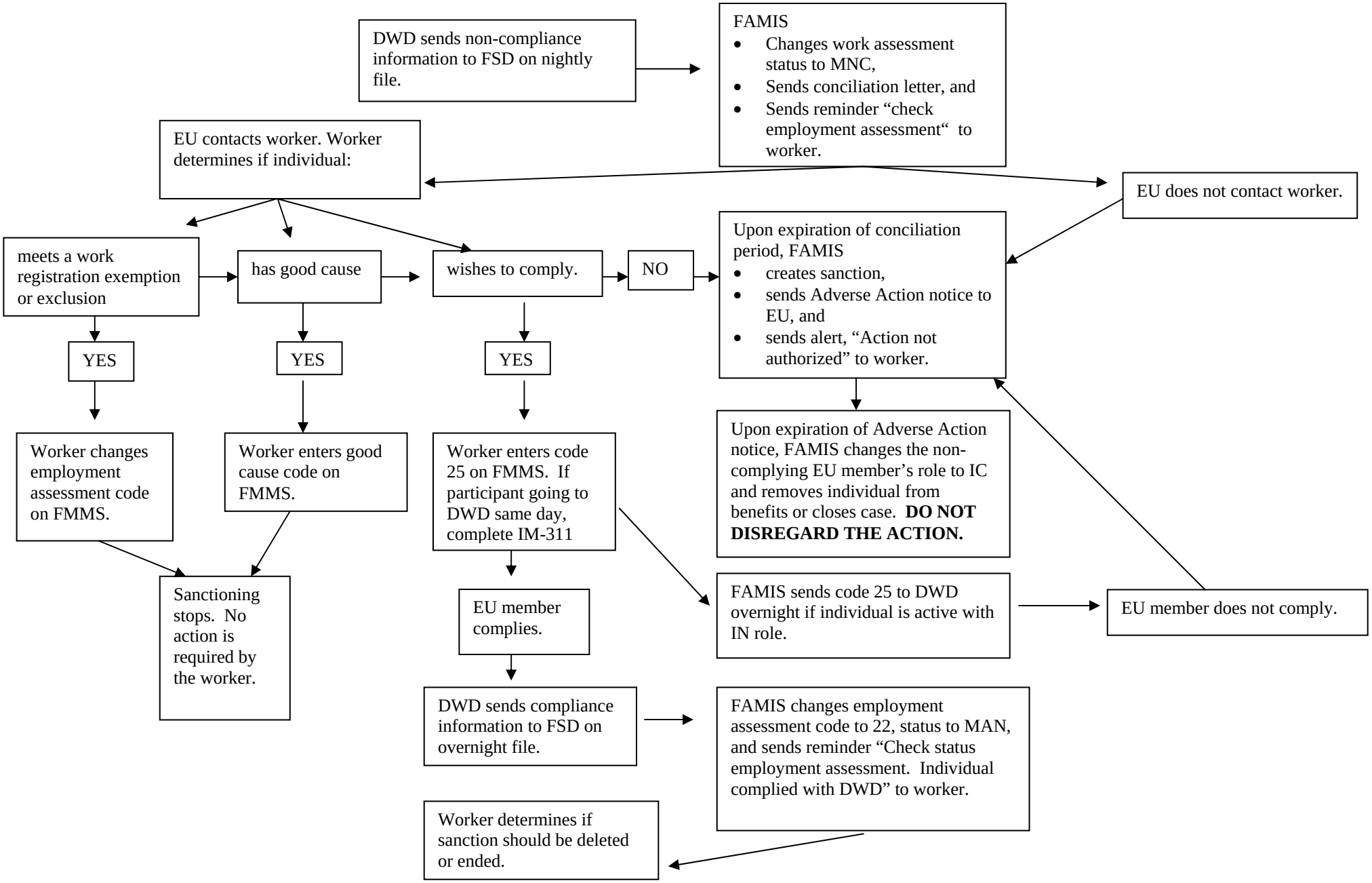DWD SANCTIONING PROCESS