

**UNITED STATES OF AMERICA  
DEPARTMENT OF THE TREASURY  
COMPTROLLER OF THE CURRENCY**

\_\_\_\_\_  
In the Matter of: )  
Business Bank of Texas, National Association ) AA-SO-2016-62  
Austin, Texas )

**CONSENT ORDER**

The Comptroller of the Currency of the United States of America (“Comptroller”), through his National Bank Examiner, has supervisory authority over Business Bank of Texas, National Association, Austin, Texas (“Bank”).

The Bank, by and through its duly elected and acting Board of Directors (“Board”), has executed a “Stipulation and Consent to the Issuance of a Consent Order,” dated July 20, 2016, that is accepted by the Comptroller. By this Stipulation and Consent, which is incorporated by reference, the Bank has consented to the issuance of this Consent Order (“Order”) by the Comptroller.

Pursuant to the authority vested in it by the Federal Deposit Insurance Act, as amended, 12 U.S.C. § 1818, the Comptroller hereby orders that:

**ARTICLE I**

**PROGRESS REPORTING - QUARTERLY**

(1) The Board shall submit quarterly progress reports to the Assistant Deputy Comptroller, San Antonio Field Office, 10001 Reunion Place, Suite 250, San Antonio, Texas 78216. These reports shall set forth in detail:

- (a) actions taken to comply with each Article of the Order;
- (b) results of those actions; and
- (c) a description of the actions needed to achieve full compliance with each

Article of this Order.

(2) The progress reports shall also include any additional actions initiated by the Board and the Bank pursuant to weaknesses identified in the current Report of Examination (ROE) or in any future ROE.

(3) The first progress report shall be submitted for the period ending September 30, 2016 and will be due within ten (10) days of that date. Thereafter, progress reports will be due within ten (10) days after each quarter end.

(4) The Board shall ensure that the Bank has sufficient processes, personnel, resources, and control systems to effectively implement and adhere to this Article.

## ARTICLE II

### BANK SECRECY ACT COMPLIANCE FUNCTION

(1) Within sixty (60) days of the date of this Order, the Board shall determine whether any modifications are needed regarding the structure of the Bank's BSA/AML department or related to oversight of BSA/AML compliance. In making this determination, the Board shall consider the level of BSA/AML risk in the Bank, the nature and type of high-risk accounts in the Bank, the BSA/AML weaknesses identified in the audit and the ROE, the workload of current BSA staff, the skillsets of current BSA staff, the levels of experience required to appropriately implement the Bank's BSA/AML monitoring tools, and the need for succession planning for the BSA Officer role to ensure continuity of BSA/AML oversight in the event of employee departures. The Board shall ensure that the structure/oversight of the BSA/AML department is appropriate to address the BSA/AML risks in the Bank, that the BSA Officer has sufficient authority/independence to perform his/her assigned responsibilities, and that there is appropriate oversight of BSA/AML at the Senior Management and Board level.

(2) Within sixty (60) days of the date of this Order, the Board shall determine whether any modifications are needed regarding the Bank's BSA staffing. In making this determination, the Board shall consider the level of BSA/AML risk in the Bank, the nature and type of high-risk accounts in the Bank, the BSA/AML weaknesses identified in the audit and the ROE, the workload of current BSA staff, the skillsets of current BSA staff, the levels of experience required to appropriately implement the Bank's BSA/AML monitoring tools, and the need for succession planning for the BSA Officer role to ensure continuity of BSA/AML oversight in the event of employee departures.

(3) Within ten (10) days of making the determinations required pursuant to this Article, the Board shall submit its determinations, supporting rationale for each determination, and planned modifications in response to each determination to the Assistant Deputy Comptroller (ADC) for a prior written no objection. Upon receiving a prior written no objection, the Board shall promptly implement and adhere to the planned modifications. Any subsequent modifications to the Bank Secrecy Act Compliance Function shall likewise be submitted to the ADC for prior written no objection.

(4) Any BSA staff (employees or consultants) hired pursuant to this Article shall have an adequate level of experience and expertise to facilitate the Bank in ensuring appropriate oversight of its BSA/AML program, taking into account the specific BSA/AML risk profile of the Bank, the technical aspects of its monitoring systems, and the deficiencies noted in the audit and ROE.

(5) The Board shall ensure that the Bank has sufficient processes, personnel, resources, and control systems to effectively implement and adhere to this Article and the modifications made pursuant to it.

## ARTICLE III

### BANK SECRECY ACT INTERNAL CONTROLS

(1) Within ninety (90) days of the date of this Order, the Board shall review, revise, and thereafter ensure Bank adherence to a written program of policies and procedures to provide for compliance with the Bank Secrecy Act, as amended (31 U.S.C. §§ 5311 et seq.), the regulations promulgated thereunder at 31 C.F.R. Part 103, as amended, 12 C.F.R. Part 21, Subparts B and C, the rules and regulations of the Office of Foreign Assets Control (“OFAC”) (collectively referred to as the “Bank Secrecy Act” or “BSA”), and the appropriate identification and monitoring of transactions that pose greater than normal risk for compliance with the BSA. This program shall include the following:

- (a) Updating the bank’s BSA/AML risk assessment to cover the risks associated with current, or subsequently proposed, Bank products, services, customers, entities, and geographies served;
- (b) reasonable procedures for conducting due diligence, as discussed further in Article IV;
- (c) identification of current customers and accounts exhibiting high risk characteristics for money laundering, terrorist financing, or other illicit activity;
- (d) an evaluation of existing internal controls to mitigate the identified risks, taking into account weaknesses noted in the audit and ROE;
- (e) policies and procedures to provide for the maintenance of integrated, accurate systems to monitor cash, monetary instruments, wire transfers, automated clearing house transactions, internal transfer transactions, etc.,

for all types of transactions, accounts, customers, products, services, and geographic areas;

- (f) procedures to perform mapping of the BSA/AML monitoring systems to ensure all accounts and transactions are captured for suspicious activity monitoring;
- (g) procedures to ensure the usage of appropriate thresholds in the Bank's automated monitoring systems to filter accounts and customers for further monitoring, review, and analysis, including:
  - (i) an analysis of the filtering thresholds established by the Bank;
  - (ii) periodic testing and monitoring of thresholds for their appropriateness to the Bank's customer base, products, services, and geographic areas;
  - (iii) a requirement that any changes to thresholds are approved at the senior management level and periodically reported to the Board; and
  - (iv) a requirement that documentation of any changes to the thresholds is maintained and available to auditors and examiners.
- (h) a requirement for independent third party validation of the models used for the BSA/AML monitoring systems in order to ensure that all accounts and transactions are captured and that the systems are adequate to detect potentially suspicious activity;
- (i) procedures to maintain accurate and complete records on wire transfers and to identify and report to appropriate management:

- (i) wire transfers or book entry transfers to domestic entities or individuals;
- (ii) wire transfers or book entry transfers that are deposited into several accounts;
- (iii) receipt and disbursement of wire transfers or book entry transfers without an apparent *bona fide* business reason;
- (iv) receipt and disbursement of wire transfers or book entry transfers that are suspicious or inconsistent with the customers' business;  
and
- (v) receipt and disbursement of currency that are suspicious or inconsistent with the customers' business;
- (j) well-defined policies and procedures for investigating and responding to transactions that have been identified as posing greater than normal risk for compliance with the Bank Secrecy Act;
- (k) adequate controls and procedures to ensure the accurate and timely filing of currency transaction reports (CTRs) and suspicious activity reports (SARs);
- (l) an independent audit program designed to ensure compliance with the Bank Secrecy Act that covers all areas of the Bank and includes an appropriate scope, risk-based testing, and retention of underlying documentation, as discussed further in Article V of this document.
- (m) a comprehensive training program for all appropriate operational and supervisory personnel to ensure their awareness of their specific assigned

responsibilities for compliance with the requirements of the Bank Secrecy Act, as discussed further in Article VI of this document;

(2) The Board shall ensure that the Bank has sufficient processes, personnel, resources, and control systems to effectively implement and adhere to all Articles of this Consent Order and the plans developed pursuant to it.

#### ARTICLE IV

##### CUSTOMER DUE DILIGENCE AND ENHANCED DUE DILIGENCE

(1) Within ninety (90) days of the date of this Order, the Bank shall develop and thereafter ensure Bank adherence to appropriate policies and procedures for collecting customer due diligence (“CDD”) and enhanced due diligence (“EDD”) information when opening new accounts, when renewing or modifying existing accounts for customers, and when the Bank obtains event-driven information indicating that it would be prudent to obtain updated information. Such policies shall be in accordance with applicable law and guidance and should give consideration to FinCEN’s recently issued regulation on *Customer Due Diligence Requirements for Financial Institutions*, which becomes effective July 11, 2016 and has an “applicability date” of May 11, 2018. At a minimum, these policies and procedures must be adequate to ensure that the Bank understands the nature and purpose of its customer relationships and shall include:

- (a) baseline documentation requirements and processes to be used for CDD at account opening, including ACH specific customer and originator due diligence policies, processes, and procedures per OCC Bulletin 2008-12, *Payment Processors Guidance*.

- (b) an appropriate methodology for assigning accurate risk levels to the Bank's customer base that assesses relevant factors including products, services, customers, entities, transactions, and geographic locations;
- (c) specification of the EDD information that bank personnel must obtain for higher-risk accounts, which among other information should include:
  - (i) Purpose of the account;
  - (ii) Source of funds and wealth;
  - (iii) Individuals with ownership or control over the account, such as beneficial owners, signatories, or guarantors;
  - (iv) Occupation or type of business (of customer or other individuals with ownership or control over the account);
  - (v) Financial Statements;
  - (vi) Bank references;
  - (vii) Domicile (where the business is organized);
  - (viii) Proximity of the customer's residence, place of employment, or place of business to the bank;
  - (ix) Description of the customer's primary trade area and whether international transactions are expected to be routine;
  - (x) Description of the business operations, the anticipated volume of currency and total sales, and a list of major customers and suppliers; and
  - (xi) Explanations for changes in account activity.



- (d) procedures that must be followed for higher-risk customers to ensure customer risk profiles are updated when appropriate and that on-going monitoring to identify and report suspicious activity is conducted;
- (e) periodic assessments by the BSA Officer or his/her designee of the effectiveness of the Bank's CDD, EDD, and monitoring activities, including timely corrective action to address weaknesses identified in the assessments, in the Bank's audit, or in a ROE; and
- (f) guidance and standards regarding when to: not open an account, permit the use of an account while verifying a customer's identity or other risks, close an account when the Bank is not able to form a reasonable belief that it knows the true identify of a customer or if the Bank does not receive requested due diligence information, and file SARs based on suspicious activity identified.

(2) The BSA Officer or his/her designee(s) monitor accounts for high-risk customers/transactions, and any related accounts, to determine whether activity is consistent with the customer's business and the stated purpose of the account. In the event that monitoring indicates account activity is not in accordance with existing account information, the bank must update the customer information.

(3) The Bank shall develop and maintain a management information system ("MIS") program that compiles CDD and EDD information. The program shall be commensurate with the Bank's BSA/AML risk profile, and shall provide appropriate staff throughout the Bank with automated ready access to CDD and EDD information.

(4) The Bank shall develop a risk-based plan to apply the requirements in its updated CDD and EDD policies and procedures to its existing customers in proportion to the risks posed by the customers.

(5) The Board shall ensure that the Bank has sufficient processes, personnel, resources, and control systems to effectively implement and adhere to this Article and the policies and procedures required pursuant to it.

## ARTICLE V

### BANK SECRECY ACT AUDIT

(1) Within ninety (90) days of the date of this Order, the Board, or a designated committee of the Board, shall adopt, implement, and thereafter ensure Bank adherence to an independent BSA/AML audit program that adheres to the minimum requirements for adequate independent testing as outlined in the FFIEC BSA/AML Examination Manual and that:

- (a) detects irregularities in the Bank's operations;
- (b) determines the Bank's level of compliance with laws, rules, and regulations;
- (c) evaluates the Bank's adherence to established policies and procedures;
- (d) performs an appropriate level of testing to support the audit findings;
- (e) ensures adequate audit coverage in all areas; and
- (f) establishes an annual audit plan using a risk-based approach sufficient to achieve these objectives.

(2) Within ninety (90) days of the date of this Order, the Board shall expand the Bank's existing BSA audit procedures to include:

- (a) development of a schedule for BSA audits from which deviations of more

than 45 days will occur only with the Board's approval;

- (b) a requirement that the audit staff shall have access to all records necessary for the proper conduct of its activities;
- (c) a requirement for a prompt management response and follow-up to audit and ROE findings; and
- (d) a risk-based approach to OFAC and Bank Secrecy Act audit that includes transactional testing and verification of data for higher-risk accounts or geographic areas of specific concern.

(3) The Board, or a designated committee, shall ensure that the audit program is independent. The persons responsible for implementing the BSA audit program described above shall report directly to the Board, or a designated committee of the Board, which shall have the sole power to direct their activities. All reports prepared by the audit staff shall be filed directly with the Board and not through any intervening party. All audit reports shall be in writing and supported by adequate workpapers, which must be provided to the Bank and retained for examiner review. The Board, or a designated committee of the Board, shall evaluate the audit reports and assess the impact on the Bank of any audit deficiencies cited in such reports.

(4) The Board, or a designated committee of the Board, shall ensure appropriate oversight of the BSA audit function, with particular emphasis on an adequately staffed department or outside firm with respect to both the experience level and number of the individuals employed.

(5) Within ninety (90) days of the date of this Order, the Board, or a designated committee, shall evaluate and develop written conclusions regarding the adequacy of the current BSA audit, reaching determinations regarding:

- (a) the adequacy of the audit's scope, transactional testing, documentation, and conclusions, with consideration of any deficiencies noted in the ROE;
- (b) an assessment of prior audits as well as management's and the Board's response to those audits; and
- (c) remedial action planned to be taken to address any audit-related deficiencies identified.

(6) Upon completion, a copy of any programs, procedures, conclusions, or other documents developed pursuant to this article shall be promptly submitted to the ADC.

(7) The Board shall ensure that the Bank has sufficient processes, personnel, resources, and control systems to effectively implement and adhere to this Article and the programs, policies, procedures, and conclusions required pursuant to it.

## ARTICLE VI

### BANK SECRECY ACT TRAINING

(1) Within ninety (90) days of the date of this Order, the Board shall develop, implement, and thereafter ensure Bank adherence to a comprehensive training program for employees and directors to ensure their awareness of their responsibility for compliance with the requirements of the Bank Secrecy Act and OFAC.

(2) This comprehensive training program shall include appropriate strategies for mandatory attendance, the frequency of training, procedures and timing for updating training programs, and the method for delivering training.

(3) The scope of the trainings shall align with the Bank's risk-profile and the types of accounts in the Bank. Specific training requirements for each employee and director shall be tailored based on each individual's job responsibilities and role in the Bank.

(4) Training requirements for the BSA Officer and other employees responsible for oversight of the BSA/AML monitoring systems shall include specific training on the capabilities and limitations of the automated systems, the rule definitions, the data mapping of the systems, how to run a model and establish rules for the system, how to test and validate the system, and how to appropriately document the coverage of and any changes made to the systems.

(5) The Board shall ensure that the Bank has sufficient processes, personnel, resources, and control systems to effectively implement and adhere to this Article and the program required pursuant to it.

## ARTICLE VII

### OVERSIGHT OF BSA/AML RISK IN NEW AND EXPANDED LINES OF BUSINESS

(1) Within ninety (90) days, the Board shall develop policies and procedures to ensure that prior to expanding existing lines of business or entering into new lines of business, the Bank has conducted a risk assessment and has in place appropriate: BSA/AML internal controls (e.g., account opening procedures, accurate risk-rating procedures, CDD/EDD, monitoring, account reviews, nested account reviews, and documentation); independent testing conducted by a person or entity knowledgeable of the business lines; a BSA Officer with experience in overseeing such business lines; and BSA/AML training of the Board and Bank personnel tailored to their job functions and covering the expanded or new business lines.

(2) While this Order remains in effect, prior to expanding its existing higher-risk business lines and/or entering new higher-risk lines of business, the Board or Management shall provide thirty (30) days prior written notice to the ADC and submit documentation regarding: the business lines that are proposed; the types of accounts, products, or services that will be a part of the business lines; how the new/expanded business lines coincide with the

Bank's strategic plan; and the steps taken to ensure appropriate oversight of such new/expanded business lines from a BSA/AML perspective, in accordance with Paragraph (1).

(3) The Board shall ensure that the Bank has sufficient processes, personnel, resources, and control systems to effectively implement and adhere to this Article and the procedures required pursuant to it.

## ARTICLE VIII

### LOAN PORTFOLIO MANAGEMENT

(1) Within sixty (60) days, the Board, or a designated committee, shall develop, implement, and thereafter ensure Bank adherence to a written program to improve the Bank's loan portfolio management. The program shall include written procedures for all loan types that provide a sufficient framework, including details on workflow, responsibilities, controls, and secondary review requirements, in order to ensure:

- (a) conformance with loan approval requirements;
- (b) collection of complete and critical loan documentation;
- (c) perfection of the bank's collateral position prior to loan funding; and
- (d) the establishment of and adherence to formal limits on the number of loan policy exceptions in total and by loan officer.

(2) Within sixty (60) days, the Board shall review, revise, and thereafter ensure Bank adherence to systems which provide for effective monitoring of:

- (a) loan policy exceptions;
- (b) credit and collateral exceptions;

- (c) the number and nature of loan policy exceptions, credit exceptions, and collateral exception by loan officer and as a percentage of the loan officer's portfolio; and
  - (d) the amount of time each exception has been outstanding.
- (3) Beginning August 1, 2016, on a monthly basis, management shall provide the Board with written reports including, at a minimum, the following information:
- (a) The number and nature of loan policy exceptions in relation to the total loan portfolio;
  - (b) The total amount of credit and collateral exceptions in the loan portfolio;
  - (c) The number and nature of loan policy exceptions, credit exceptions, and collateral exception by loan officer and as a percentage of the loan officer's portfolio; and
  - (d) An aging analysis of each loan officer's exceptions and the expected corrective action.
- (4) The Board shall ensure that the Bank has sufficient processes, personnel, resources, and control systems to effectively implement and adhere to this Article and programs, systems, and reporting requirements required pursuant to it.

## ARTICLE IX

### CLOSING

- (1) Although the Board is by this Order required to submit certain proposed actions and programs for the review or prior written determination of no supervisory objection of the ADC, the Board has the ultimate responsibility for proper and sound management of the Bank.
- (2) It is expressly and clearly understood that if, at any time, the Comptroller deems it

appropriate in fulfilling the responsibilities placed upon it by the several laws of the United States of America to undertake any action affecting the Bank, nothing in this Order shall in any way inhibit, estop, bar or otherwise prevent the Comptroller from so doing.

(3) Any time limitations imposed by this Order shall begin to run from the effective date of this Order. Such time limitations may be extended in writing by the ADC for good cause upon written application by the Board.

(4) The provisions of this Order are effective upon issuance of this Order by the Comptroller, through his authorized representative whose hand appears below, and shall remain effective and enforceable, except to the extent that, and until such time as, any provisions of this Order shall have been amended, suspended, waived, or terminated in writing by the Comptroller.

(4) In each instance in this Order in which the Board is required to ensure adherence to, and undertake to perform certain obligations of the Bank, it is intended to mean that the Board shall:

- (a) authorize and adopt such actions on behalf of the Bank as may be necessary for the Bank to perform its obligations and undertakings under the terms of this Order;
- (b) require the timely reporting by Bank management of such actions directed by the Board to be taken under the terms of this Order;
- (c) follow-up on any non-compliance with such actions in a timely and appropriate manner; and
- (d) require corrective action be taken in a timely manner of any non-compliance with such actions.



(5) This Order is intended to be, and shall be construed to be, a final order issued pursuant to 12 U.S.C. § 1818(b), and expressly does not form, and may not be construed to form, a contract binding on the Comptroller or the United States.

(6) The terms of this Order, including this paragraph, are not subject to amendment or modification by any extraneous expression, prior agreements or prior arrangements between the parties, whether oral or written.

IT IS SO ORDERED, this 20th day of July, 2016.

/s/

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Janice McQuary  
Associate Deputy Comptroller

**UNITED STATES OF AMERICA  
DEPARTMENT OF THE TREASURY  
COMPTROLLER OF THE CURRENCY**

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**In the Matter of:** )  
Business Bank of Texas, National Association )  
Austin, Texas )

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**STIPULATION AND CONSENT TO THE ISSUANCE  
OF A CONSENT ORDER**

The Comptroller of the Currency of the United States of America (“Comptroller”) intends to initiate cease and desist proceedings against Business Bank of Texas, National Association, Austin, Texas (“Bank”) pursuant to 12 U.S.C. § 1818(b) for unsafe and unsound banking practices relating to Bank Secrecy Act compliance and credit administration as well as violations of 12 C.F.R. § 21.21 and 31 C.F.R. § 1010.306.

The Bank, in the interest of compliance and cooperation, consents to the issuance of a Consent Order, dated July 20, 2016 (“Order”);

In consideration of the above premises, the Comptroller, through his authorized representative, and the Bank, through its duly elected and acting Board of Directors, hereby stipulate and agree to the following:

**ARTICLE I**

**JURISDICTION**

(1) The Bank is a national banking association chartered and examined by the Comptroller pursuant to the National Bank Act of 1864, as amended, 12 U.S.C. § 1, *et seq.*

(2) The Comptroller is “the appropriate Federal banking agency” regarding the Bank pursuant to 12 U.S.C. §§ 1813(q) and 1818(b).

(3) The Bank is an “insured depository institution” within the meaning of 12 U.S.C. § 1818(b)(1).

(4) This Order shall cause the Bank to be designated as in “troubled condition,” as set forth in 12 C.F.R. § 5.51(c)(6), unless otherwise informed in writing by the Comptroller. In addition, this Agreement shall cause the Bank not to be designated as an “eligible bank” for purposes of 12 C.F.R. § 5.3(g), unless otherwise informed in writing by the Comptroller.

## ARTICLE II

### AGREEMENT

(1) The Bank, without admitting or denying any wrongdoing, hereby consents and agrees to the issuance of the Order by the Comptroller.

(2) The Bank further agrees that said Order shall be deemed an “order issued with the consent of the depository institution” as defined in 12 U.S.C. § 1818(h)(2), and consents and agrees that said Order shall become effective upon its issuance and shall be fully enforceable by the Comptroller under the provisions of 12 U.S.C. § 1818(i). Notwithstanding the absence of mutuality of obligation, or of consideration, or of a contract, the Comptroller may enforce any of the commitments or obligations herein undertaken by the Bank under his supervisory powers, including 12 U.S.C. § 1818(i), and not as a matter of contract law. The Bank expressly acknowledges that neither the Bank nor the Comptroller has any intention to enter into a contract.

(3) The Bank also expressly acknowledges that no officer or employee of the Comptroller has statutory or other authority to bind the United States, the U.S. Treasury Department, the Comptroller, or any other federal bank regulatory agency or entity, or any officer or employee of any of those entities to a contract affecting the Comptroller’s exercise of his supervisory responsibilities.

ARTICLE III

WAIVERS

- (1) The Bank, by signing this Stipulation and Consent, hereby waives:
- (a) the issuance of a Notice of Charges pursuant to 12 U.S.C. § 1818(b);
  - (b) any and all procedural rights available in connection with the issuance of the Order;
  - (c) all rights to a hearing and a final agency decision pursuant to 12 U.S.C. § 1818(i), 12 C.F.R. Part 19
  - (d) all rights to seek any type of administrative or judicial review of the Order; and
  - (e) any and all rights to challenge or contest the validity of the Order.

ARTICLE IV

OTHER ACTION

(1) The Bank agrees that the provisions of this Stipulation and Consent shall not inhibit, estop, bar, or otherwise prevent the Comptroller from taking any other action affecting the Bank if, at any time, it deems it appropriate to do so to fulfill the responsibilities placed upon it by the several laws of the United States of America.

IN TESTIMONY WHEREOF, the undersigned, authorized by the Comptroller as his representative, has hereunto set his hand on behalf of the Comptroller.

/s/

July 20, 2016

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Janice McQuary  
Associate Deputy Comptroller

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Date

IN TESTIMONY WHEREOF, the undersigned, as the duly elected and acting Board of Directors of the Bank, have hereunto set their hands on behalf of the Bank.

/s/  
\_\_\_\_\_  
Windel Cannon

7-19-2016  
\_\_\_\_\_  
Date

/s/  
\_\_\_\_\_  
B. Scott Chapman

7-19-16  
\_\_\_\_\_  
Date

/s/  
\_\_\_\_\_  
Edward L. Lette

7/19/16  
\_\_\_\_\_  
Date

/s/  
\_\_\_\_\_  
David Sather

7/19/16  
\_\_\_\_\_  
Date

/s/  
\_\_\_\_\_  
Robert L. Wright, Jr.

7/25/16  
\_\_\_\_\_  
Date