UNITED STATES SECURITIES AND EXCHANGE COMMISSION Washington, DC 20549

FORM TCR TIP, COMPLAINT OR REFERRAL

A. INFORMATION ABOUT YOU						
COMPLAINANT 1:						
1. Last Name			First		M.I.	
Street Address			Apartment/ Unit #			
City	State/ Province		ZIP/ Postal Code	Country	ı	
3. Telephone	Alt. Phone		E-mail Address	Preferred method of communication		
4. Occupation						
COMPLAINANT 2:						
1. Last Name			First		M.I.	
Street Address		Apartmei Unit #		ent/		
City	State/ Province		ZIP/ Postal Code	Country		
3. Telephone	Alt. Phone		E-mail Address	Preferred method of communication		
4. Occupation						
B. ATTORNEY'S INFORMATION (If A	pplicable - See Ins	structio	ons)			
Attorney's Name						
2. Firm Name						
3. Street Address						
City	State/ Province	ZIP/ Postal	Code	Co	untry	
4. Telephone	Fax	E-mail	Address			

C. TELL US ABOUT THE INDIVIDUAL OR ENTITY YOU HAVE A COMPLAINT AGAINST					
INDIVIDUAL/ENTITY 1:	If an individual, specify profession:				
1. Type: Individual Entity	If an entity, specify type:				
2. Name					
3. Street Address					Apartment/ Unit #
City	State/ Province		ZIP/ Postal Code		Country
4. Phone	E-mail Add	dress	Internet address		address
INDIVIDUAL/ENTITY 2:	If an indivi	dual, specify profess	ion:		
1. Type: Individual Entity	If an entity, specify type:				
2. Name					
3. Street Address	Apartment/ Unit #				
City	State/ ZIP/ Province Postal Code			Country	
4. Phone	E-mail Address Internet Address			Address	
D. TELL US ABOUT YOUR COMPLAI	NT				
1. Occurrence Date (mm/dd/yyyy): / / 2. Nature of complaint:					
3a. Has the complainant or counsel had any prior communication(s) with the SEC concerning this matter? YES NO					
3b. If the answer to 3a is "Yes," name of SEC staff member with whom the complainant or counsel communicated 4a. Has the complainant or counsel provided the information to any other agency or organization, or has any other agency or organization requested					
the information or related information from you? YES NO					
4b. If the answer to 4a is "Yes," please provide details. Use additional sheets if necessary.					
4c. Name and contact information for point of contact at agency or organization, if known					

5a. Does this complaint relate to an entity of which the complainant is or was an officer, director, counsel, YES NO	employee, consultant or con	tractor?
5b. If the answer to question 5a is "yes," has the complainant reported this violation to his or her supervisombudsman, or any other available mechanism at the entity for reporting violations?	or, compliance office, whistl	eblower hotline,
5c. If the answer to question 5b is "yes," please provide details. Use additional sheets if necessary.	120	140
5d. Date on which the complainant took the action(s) described in question 5b (mm/dd/yyyy):	/ /	
Go. Hop the complainant taken any other action regarding your complaint?	VES	NO
6a. Has the complainant taken any other action regarding your complaint?6b. If the answer to question 6a is "yes," please provide details. Use additional sheets if necessary.	YES _	NO L
7a. Type of security or investment, if relevant		
7b. Name of issuer or security, if relevant	7c. Security/ Ticker Symbol or CUSIP no	0
8. State in detail all facts pertinent to the alleged violation. Explain why the complainant believes the acts securities laws. Use additional sheets if necessary.	described constitute a violat	ion of the federal
 Describe all supporting materials in the complainant's possession and the availability and location of ar complainant's possession. Use additional sheets, if necessary. 	ny additional supporting mate	erials not in

10. Describe how and from whom the complainant obtained the information that supports this claim. If any information was obtained from or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any i was obtained from a public source, identify the source with as much particularity as possible. Attach additional sheets if necessary.	n an attorney nformation
11. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to revidentity and explain the basis for your belief that your identity would be revealed if the documents were disclosed to a third party.	eal your
definity and explain the basis for your belief that your identity would be revealed if the documents were disclosed to a tillid party.	

12. Provide any additional information you think may be relevant.		
E. ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION		
1. Are you, or were you at the time you acquired the original information you are submitting to us, a member, officer or em		
Justice, the Securities and Exchange Commission, the Comptroller of the Currency, the Board of Governors of the Federa		
Federal Deposit Insurance Corporation, the Office of Thrift Supervision; the Public Company Accounting Oversight Board; organization; or any national securities exchange, registered securities association, registered clearing agency, or the Mu		
Rulemaking Board?	nicipai Securities	•
	YES	NO 🗌
2. Are your or were you at the time you acquired the original information you are submitting to us, a member officer or am		
2. Are you, or were you at the time you acquired the original information you are submitting to us, a member, officer or emgovernment, any political subdivision, department, agency, or instrumentality of a foreign government, or any other foreign		
as that term is defined in Section 3(a)(52) of the Securities Exchange Act of 1934 (15 U.S.C. §78c(a)(52))?	a.reiai regulai	,
	YES	NO 🗌
3. Did you acquire the information being provided to us through the performance of an engagement required under the fed		
independent public accountant?	orar occurring ra	we by an
	YES	NO 🗌
4. Are you providing this information pursuant to a cooperation agreement with the SEC or another agency or organization		140
7 No you providing the intermation parodality a dooperation agreement with the one of another agency or organization		NO 🖂
5. Assume a second deliberation of a second	YES	NO
5. Are you a spouse, parent, child, or sibling of a member or employee of the SEC, or do you reside in the same househol of the SEC?	d as a member	or employee
	VEO	,,, []
	YES	NO
6. Are you providing this information before you (or anyone representing you) received any request, inquiry or demand that of your submission (i) from the SEC, (ii) in connection with an investigation, inspection or examination by the Public Comp Board, or any self-regulatory organization; or (iii) in connection with an investigation by the Congress, any other authority	any Accounting	Oversight
or a state Attorney General or securities regulatory authority?	or the rederal go	veriment,
of a state / morney contrait of cocamilor regulatory authority.	VEC	NO 🖂
		NO
7. Annual company and in the standard of a similar line stimution, as he can be a similar line of a similar line in a	YES	
7. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in corvou are submitting to the SEC2		momation
7. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in coryou are submitting to the SEC?	nection with the	
you are submitting to the SEC?		NO
	nection with the	
you are submitting to the SEC?	nection with the	
you are submitting to the SEC?	YES YES	NO _
you are submitting to the SEC? 8. Did you acquire the information being provided to us from any person described in questions E1 through E7?	YES YES	NO _
you are submitting to the SEC? 8. Did you acquire the information being provided to us from any person described in questions E1 through E7?	YES YES	NO _
you are submitting to the SEC? 8. Did you acquire the information being provided to us from any person described in questions E1 through E7?	YES YES	NO _
you are submitting to the SEC? 8. Did you acquire the information being provided to us from any person described in questions E1 through E7?	YES YES	NO _
you are submitting to the SEC? 8. Did you acquire the information being provided to us from any person described in questions E1 through E7?	YES YES	NO _

F. WHISTLEBLOWER'S DECLARATION	
I declare under penalty of perjury under the laws of the United States that the information con my knowledge, information and belief. I fully understand that I may be subject to prosecution submission of information, my other dealings with the SEC, or my dealings with another author willfully make any false, fictitious, or fraudulent statements or representations, or use any false document contains any false, fictitious, or fraudulent statement or entry.	and ineligible for a whistleblower award if, in my ority in connection with a related action, I knowingly and
Print name	
Signature	Date
G. COUNSEL CERTIFICATION	
I certify that I have reviewed this form for completeness and accuracy and that the information best of my knowledge, information and belief. I further certify that I have verified the identity of submitted by viewing the whistleblower's valid, unexpired government issued identification (e. signed copy of this form, with Section F signed by the whistleblower, in my records. I further of waiveable consent to provide the Commission with his or her original signed Form TCR upon to concerns that the whistleblower may have knowingly and willfully made false, fictitious, or frow witing or document knowing that the writing or document contains any false fictitious or fraudo obligated to do so within 7 calendar days of receiving such a request from the Commission.	the whistleblower on whose behalf this form is being g , driver's license, passport) and will retain an original, certify that I have obtained the whistleblower's non-request in the event that the Commission requests it due audulent statements or representations, or used any false
Signature	Date

Privacy Act Statement

This notice is given under the Privacy Act of 1974. This form may be used by anyone wishing to provide the SEC with information concerning a possible violation of the federal securities laws. We are authorized to request information from you by various laws: Sections 19 and 20 of the Securities Act of 1933, Sections 21 and 21F of the Securities Exchange Act of 1934, Section 321 of the Trust Indenture Act of 1939, Section 42 of the Investment Company Act of 1940, Section 209 of the Investment Advisers Act of 1940 and Title 17 of the Code of Federal Regulations, Section 202.5.

Our principal purpose in requesting information is to gather facts in order to determine whether any person has violated, is violating, or is about to violate any provision of the federal securities laws or rules for which we have enforcement authority. Facts developed may, however, constitute violations of other laws or rules. Further, if you are submitting information for the SEC's whistleblower award program pursuant to Section 21F of the Securities Exchange Act of 1934 (Exchange Act), the information provided will be used in connection with our evaluation of your or your client's eligibility and other factors relevant to our determination of whether to pay an award to you or your client.

The information provided may be used by SEC personnel for purposes of investigating possible violations of, or to conduct investigations authorized by, the federal securities law; in proceedings in which the federal securities laws are in issue or the SEC is a party; to coordinate law enforcement activities between the SEC and other federal, state, local or foreign law enforcement agencies, securities self regulatory organizations, and foreign securities authorities; and pursuant to other routine uses as described in SEC-42 "Enforcement Files."

Furnishing the information requested herein is voluntary. However, a decision not provide any of the requested information, or failure to provide complete information, may affect our evaluation of your submission. Further, if you are submitting this information for the SEC whistleblower program and you do not execute the Whistleblower Declaration or, if you are submitting information anonymously, identify the attorney representing you in this matter, you may not be considered for an award.

Questions concerning this form maybe directed to the SEC Office of the Whistleblower, 100 F Street, NE, Washington, DC 20549, Tel. (202) 551-4790, Fax (703) 813-9322.

Submission Procedures

- After manually completing this Form TCR, please send it by mail or delivery to the SEC Office of the Whistleblower, 100 F. Street, NE, Washington, DC 20549, or by facsimile to (703) 813-9322.
- You have the right to submit information anonymously. If you are submitting anonymously and you want to be considered for a whistleblower award, however, you *must* be represented by an attorney in this matter and Section B of this form must be completed. Otherwise, you may, but are not required, to have an attorney. If you are not represented by an attorney in this matter, you may leave Section B blank.
- If you are submitting information for the SEC's whistleblower award program, you must submit your information either using this Form TCR or electronically through the SEC's Electronic Data Collection System, available on the SEC web site at [insert link].

Instructions for Completing Form TCR:

Section A: Information about You

Questions 1-3: Please provide the following information about yourself:

- Last name, first name, and middle initial
- Complete address, including city, state and zip code
- Telephone number and, if available, an alternate number where you can be reached
- Your e-mail address (to facilitate communications, we strongly encourage you to provide your email address),
- Your preferred method of communication; and
- Your occupation

Section B: Information about Your Attorney. Complete this section only if you are represented by an attorney in this matter. You must be represented by an attorney, and this section must be completed, if you are submitting your information anonymously and you want to be considered for the SEC's whistleblower award program.

Questions 1-4: Provide the following information about the attorney representing you in this matter:

- Attorney's name
- Firm name
- Complete address, including city, state and zip code
- Telephone number and fax number, and
- E-mail address

Section C: Tell Us about the Individual and/or Entity You Have a Complaint Against. If your complaint relates to more than two individuals and/or entities, you may attach additional sheets.

Question 1: Choose one of the following that best describes the individual or entity to which your complaint relates:

- For Individuals: accountant, analyst, attorney, auditor, broker, compliance officer, employee, executive officer or director, financial planner, fund manager, investment advisor representative, stock promoter, trustee, unknown, or other (specify).
- Industry Regulatory Authority, insurance company, investment advisor, investment advisor representative, investment company, Individual Retirement Account or 401(k) custodian/administrator, market maker, municipal securities dealers, mutual fund, newsletter company/investment publication company, on-line trading firm, private fund company (including hedge fund, private equity fund, venture capital fund, or real estate fund), private/closely held company, publicly held company, transfer agent/paying agent/registrar, underwriter, unknown, or other (specify).

Questions 2-4: For each subject, provide the following information, if known:

- Full name
- Complete address, including city, state and zip code
- Telephone number,
- E-mail address, and
- Internet address, if applicable

Section D: Tell Us about Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct began.

Question 2: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply. Use additional sheets if necessary.

- Theft/misappropriation (advance fee fraud; lost or stolen securities; hacking of account)
- Misrepresentation/omission (false/misleading marketing/sales literature; inaccurate, misleading or non-disclosure by Broker-Dealer, Investment Adviser and Associated
 Person; false/material misstatements in firm research that were basis of transaction)
- Offering fraud (Ponzi/pyramid scheme; other offering fraud)
- Registration violations (unregistered securities offering)
- Trading (after hours trading; algorithmic trading; front-running; insider trading,
 manipulation of securities/prices; market timing; inaccurate quotes/pricing information;
 program trading; short selling; trading suspensions; volatility)
- Fees/mark-ups/commissions (excessive or unnecessary administrative fees; excessive commissions or sales fees; failure to disclose fees; insufficient notice of change in fees; negotiated fee problems; excessive mark-ups/markdowns; excessive or otherwise improper spreads)
- Corporate disclosure/reporting/other issuer matter (audit; corporate governance; conflicts
 of interest by management; executive compensation; failure to notify shareholders of
 corporate events; false/misleading financial statements, offering documents, press

- releases, proxy materials; failure to file reports; financial fraud; Foreign Corrupt Practices Act violations; going private transactions; mergers and acquisitions; restrictive legends, including 144 issues; reverse stock splits; selective disclosure Regulation FD, 17 CFR 243; shareholder proposals; stock options for employees; stock splits; tender offers)
- Sales and advisory practices (background information on past violations/integrity; breach of fiduciary duty/responsibility (IA); failure to disclose breakpoints; churning/excessive trading; cold calling; conflict of interest; abuse of authority in discretionary trading; failure to respond to investor; guarantee against loss/promise to buy back shares; high pressure sales techniques; instructions by client not followed; investment objectives not followed; margin; poor investment advice; Regulation E (Electronic Transfer Act); Regulation S-P, 17 CFR 248, (privacy issues); solicitation methods (non-cold calling; seminars); suitability; unauthorized transactions)
- Operational (bond call; bond default; difficulty buying/selling securities;
 confirmations/statements; proxy materials/prospectus; delivery of funds/proceeds;
 dividend and interest problems; exchanges/switches of mutual funds with fund family;
 margin (illegal extension of margin credit, Regulation T restrictions, unauthorized margin transactions); online issues (trading system operation); settlement (including T+1 or T=3 concerns); stock certificates; spam; tax reporting problems; titling securities (difficulty titling ownership); trade execution.
- Customer accounts (abandoned or inactive accounts; account administration and processing; identity theft affecting account; IPOs: problems with IPO allocation or eligibility; inaccurate valuation of Net Asset Value; transfer of account)
- Comments/complaints about SEC, Self-Regulatory Organization, and Securities Investor
 Protection Corporation processes & programs (arbitration: bias by arbitrators/forum,
 failure to pay/comply with award, mandatory arbitration requirements, procedural
 problems or delays; SEC: complaints about enforcement actions, complaints about
 rulemaking, failure to act; Self-Regulatory Organization: failure to act; Investor Protection:

inadequacy of laws or rules; SIPC: customer protection, proceedings and Broker-Dealer liquidations;

- Other (analyst complaints; market maker activities; employer/employee disputes; specify other).
- Question 3a: State whether you or your counsel have had any prior communications with the SEC concerning this matter.
- Question 3b: If the answer to question 3a is yes, provide the name of the SEC staff member with whom you or your counsel communicated.
- Question 4a: Indicate whether you or your counsel have provided the information you are providing to the SEC to any other agency or organization.
- Question 4b: If the answer to question 4a is yes, provide details.
- Question 4c: Provide the name and contact information of the point of contact at the other agency or organization, if known.
- Question 5a: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant, or contractor.
- Question 5b: If the answer to question 5a is yes, state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations.
- Question 5c: If the answer to question 5b is yes, provide details.
- Question 5d: Provide the date on which you took the actions described in questions 5a and 5b..
- Question 6a: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the SEC, another regulator, a law enforcement agency, or any other agency or organization; initiated legal action, mediation or arbitration, or initiated any other action.
- Question 6b: If you answered yes to question 6a, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint and contact information for the person or entity, if known, and the

complete case name, case number, and forum of any legal action you have taken. Use additional sheets if necessary.

Question 7a: Choose from the following the option that you believe best describes the type of security or investment at issue, if applicable:

- 1031 exchanges
- 529 plans
- American Depositary Receipts
- · Annuities (equity-indexed annuities, fixed annuities, variable annuities)
- · Asset-backed securities
- · Auction rate securities
- Banking products (including credit cards)
- Certificates of deposit (CDs)
- · Closed-end funds
- Coins and precious metals (gold, silver, etc.)
- Collateralized mortgage obligations (CMOs)
- · Commercial paper
- · Commodities (currency transactions, futures, stock index options)
- · Convertible securities
- Debt (corporate, lower-rated or "junk", municipal)
- Equities (exchange-traded, foreign, Over-the-Counter, unregistered, linked notes)
- Exchange Traded Funds
- · Franchises or business ventures
- · Hedge funds
- Insurance contracts (not annuities)
- Money-market funds
- Mortgage-backed securities (mortgages, reverse mortgages)
- Mutual funds
- Options (commodity options, index options)

- Partnerships
- Preferred shares
- Prime bank securities/high yield programs
- · Promissory notes
- Real estate (real estate investment trusts (REITs))
- Retirement plans (401(k), IRAs)
- Rights and warrants
- Structured note products
- · Subprime issues
- · Treasury securities
- U.S. government agency securities
- Unit investment trusts (UIT)
- · Viaticals and life settlements
- Wrap accounts
- Separately Managed Accounts (SMAs)
- Unknown
- · Other (specify)
- Question 7b: Provide the name of the issuer or security, if applicable.
- Question 7c: Provide the ticker symbol or CUSIP number of the security, if applicable.
- Question 8: State in detail all the facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the federal securities laws. Attach additional sheets if necessary.
- Question 9: Describe all supporting materials in your possession and the availability and location of additional supporting materials not in your possession. Attach additional sheets if necessary.
- Question 10: Describe how you obtained the information that supports your allegation. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if

any information was obtained from a public source, identify the source with as much particularity as possible. Attach additional sheets if necessary.

Question 11: You may use this space to identify any documents or other information in your submission that you believe could reasonably be expected to reveal your identity.

Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 12: Provide any additional information you think may be relevant.

Section E: Eligibility Requirements

Question 1: State whether you are currently, or were at the time you acquired the original information that you are submitting to the SEC, a member, officer, or employee of the Department of Justice; the Securities and Exchange Commission; the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the Office of Thrift Supervision; the Public Company Accounting Oversight Board; any law enforcement organization; or any national securities exchange, registered securities association, registered clearing agency, the Municipal Securities Rulemaking Board

Question 2: State whether you are, or were you at the time you acquired the original information you are submitting to the SEC, a member, officer or employee of a foreign government, any political subdivision, department, agency, or instrumentality of a foreign government, or any other foreign financial regulatory authority as that term is defined in Section 3(a)(52) of the Securities Exchange Act of 1934.

• Section 3(a)(52) of the Exchange Act (15 U.S.C. §78c(a)(52)) currently defines "foreign financial regulatory authority" as "any (A) foreign securities authority, (B) other governmental body or foreign equivalent of a self-regulatory organization empowered by a foreign government to administer or enforce its laws relating to the regulation of fiduciaries, trusts, commercial lending, insurance, trading in contracts of sale of a commodity for future delivery, or other instruments traded

on or subject to the rules of a contract market, board of trade, or foreign equivalent, or other financial activities, or (C) membership organization a function of which is to regulate participation of its members in activities listed above."

- Question 3: State whether you acquired the information you are providing to the SEC through the performance of an engagement required under the securities laws by an independent public accountant.
- Question 4: State whether you are providing the information pursuant to a cooperation agreement with the SEC or with any other agency or organization.
- Question 5: State whether you are a spouse, parent, child or sibling of a member or employee of the SEC, or whether you reside in the same household as a member or employee of the SEC.
- Question 6: State whether you acquired the information you are providing to the SEC from any individual described in Question 1 through 5 of this Section.
- Question 7: If you answered "yes" to questions 1 though 6, please provide details.
- Question 8a: State whether you are providing the information you are submitting to the SEC before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of your submission in connection with: (i) an investigation, inspection or examination by the SEC, the Public Company Accounting Oversight Board, or any self-regulatory organization; or (ii) an investigation by Congress, or any other authority of the federal government, or a state Attorney General or securities regulatory authority?
- Question 8b: If you answered "no" to questions 8a, please provide details. Use additional sheets if necessary.
- Question 9a: State whether you are the subject or target of a criminal investigation or have been convicted of a criminal violation in connection with the information you are submitting to the SEC.
- Question 9b: If you answered "yes" to question 9a, please provide details, including the name of the agency or organization that conducted the investigation or initiated the action against you, the name and telephone number of your point of contact at the agency or

organization, if available and the investigation/case name and number, if applicable. Use additional sheets, if necessary.

SECTION F: Whistleblower's Declaration.

You must sign this Declaration if you are submitting this information pursuant to the SEC whistleblower program and wish to be considered for an award. If you are submitting your information anonymously, you must still sign this Declaration, and you must provide your attorney with the original of this signed form.

If you are <u>not</u> submitting your information pursuant to the SEC whistleblower program, you do not need to sign this Declaration.

SECTION G: COUNSEL CERTIFICATION

If you are submitting this information pursuant to the SEC whistleblower program and are doing so anonymously, your attorney <u>must</u> sign the Counsel Certification section.

If you are represented in this matter but you are <u>not</u> submitting your information pursuant to the SEC whistleblower program, your attorney does not need to sign the Counsel Certification Section.