OMB Approval
OMB Number:3235
Expires:Month, 2018
Estimated average burden hours per
response:
per amendment:

Application for Registration of Security-based Swap Dealers and Major Securitybased Swap Participants that are Registered or Registering with the Commodity Futures Trading Commission as a Swap Dealer or Major Swap Participant

FORM SBSE-A INSTRUCTIONS

A. GENERAL INSTRUCTIONS

- FORM Form SBSE-A is the Application for Registration as either a Security-based Swap Dealer or Major Security-based Swap Participant (collectively, "SBS Entities") by an entity that is not registered or registering with the Commission as a broker-dealer but is registered or registering with the Commodity Futures Trading Commission ("CFTC") as a swap dealer or major swap participant. These SBS Entities must file this form and a legible copy of the Form 7-R they file with the CFTC (or its designee) to register with the Securities and Exchange Commission. An applicant must also file Schedules A, B, C, D and F, as appropriate. There is no Schedule E. An entity that is registered or registering with the Commission as a broker-dealer and also is registered or registering with the Commodity Futures Trading Commission ("CFTC") as a swap dealer or major swap participant should file Form SBSE-BD to register with the Commission as an SBS Entity.
- 2. **ELECTRONIC FILING** This Form SBSE-A must be filed electronically with the Commission through the EDGAR system, and must utilize the EDGAR Filer Manual (as defined in 17 CFR 232. 11) to file and amend Form SBSE-A electronically to assure the timely acceptance and processing of those filings. Additional documents shall be attached to this electronic application.
- 3. **UPDATING** By law, the *applicant* must promptly update Form SBSE-A information by submitting amendments whenever the information on file becomes inaccurate or incomplete for any reason [17 CFR 240.15Fb2-3]. In addition, the applicant must update any incomplete or inaccurate information contained on Form SBSE-A prior to filing a notice of withdrawal from registration on Form SBSE-W [17 CFR 15Fb3-2(a)].
- 4. **CONTACT EMPLOYEE** The individual listed as the contact employee must be authorized to receive all compliance information, communications, and mailings, and be responsible for disseminating it within the *applicant's* organization.
- 4. FEDERAL INFORMATION LAW AND REQUIREMENTS An agency may not conduct or sponsor, and a *person* is not required to respond to, a collection of information unless it displays a currently valid control number. Sections 15F, 17(a) and 23(a) of the Exchange Act authorize the SEC to collect the information on this form from registrants. See 15 U.S.C. §§780-10, 78q and 78w. Filing of this form is mandatory. The principal purpose of this Form is to permit the Commission to determine whether the *applicant* meets the statutory requirement to engage in the security-based swap business. The Commission maintains a file of the information on this form and will make information collected via the form publicly available. Any member of the public may direct to the Commission any comments concerning the accuracy of the burden estimate on this Form, and any suggestions for reducing this burden. This collection of information has been reviewed by the Office of Management and Budget in accordance with the clearance requirements of 44 U.S.C. §3507. The information contained in this form is part of a system of records subject to the Privacy Act of 1974, as amended. The Securities and Exchange Commission has published in the Federal Register the Privacy Act Systems of Records Notice for these records.

B. FILING INSTRUCTIONS

1. FORMAT

- a. Items 1-19 and the accompanying Schedules and DRP pages must be answered and all fields requiring a response must be completed before the filing will be accepted.
- b. Failure to follow instructions or properly complete the form may result in the application being delayed or rejected.
- c. *Applicant* must complete the execution screen certifying that Form SBSE-A and amendments thereto have been executed properly and that the information contained therein is accurate and complete.
- d. To amend information, the *applicant* must update the appropriate Form SBSE-A screens.
- e. A paper copy, with original signatures, of the initial Form SBSE-A filing and amendments to Disclosure Reporting Pages (DRPs) must be retained by the *applicant* and be made available for inspection upon a regulatory request.
- 2. DISCLOSURE REPORTING PAGE (DRP) Information concerning a *principal* that relates to the occurrence of an event reportable in Schedule D must be provided on the appropriate DRP.

The mailing address for questions and correspondence is:

The Securities and Exchange Commission Washington, DC 20549

EXPLANATION OF TERMS (The following terms are italicized throughout this form.)

1. GENERAL

Terms used in this Form SBSE-A that are defined in the form the CFTC requires that swap dealers and major swap participants use to apply for registration with the CFTC shall have the same meaning as set forth in that form.

APPLICANT - The security-based swap dealer or major security-based swap participant applying on or amending this form.

CONTROL - The power, directly or indirectly, to direct the management or policies of a company, whether through ownership of securities, by contract, or otherwise. Any *person* that (i) is a director, general partner or officer exercising executive responsibility (or having similar status or functions); (ii) directly or indirectly has the right to vote 25% or more of a class of a voting security or has the power to sell or direct the sale of 25% or more of a class of voting securities; or (iii) in the case of a partnership, has the right to receive upon dissolution, or has contributed, 25% or more of the capital, is presumed to *control* that company.

JURISDICTION - A state, the District of Columbia, the Commonwealth of Puerto Rico, the U.S. Virgin Islands, or any subdivision or regulatory body thereof.

SUCCESSOR –The term "successor" is defined to be an unregistered entity that assumes or acquires substantially all of the assets and liabilities, and that continues the business of, a predecessor security-based swap dealer or major security-based swap participants that ceases its security-based swap activities. [See Exchange Act Rule 15b2-5 (17 CFR 240.15Fb2-5)]

UNIQUE IDENTIFICATION CODE or **UIC** – For purposes of Form SBSE-A, the term "unique identification code" or "UIC" means a unique identification code assigned to a person by an internationally recognized standards-setting system that is recognized by the Commission [pursuant to Rule 903(a) of Regulation SBSR (17 CFR 242.903(a))].

3. FOR THE PURPOSE OF SCHEDULE D AND THE CORRESPONDING DISCLOSURE REPORTING PAGES (DRPs)

FOREIGN FINANCIAL REGULATORY AUTHORITY - Includes (1) a foreign securities authority; (2) 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 *financial services industry-related* activities; and (3) a foreign membership organization, a function of which is to regulate the participation of its members in the activities listed above.

FINANCIAL SERVICES INDUSTRY-RELATED – Pertaining to securities, commodities, banking, savings association activities, credit union activities, insurance, or real estate (including, but not limited to, acting as or being associated with a broker-dealer, municipal securities dealer, government securities broker or dealer, issuer, investment company, investment adviser, futures sponsor, bank, security-based swap dealer, major security-based swap participant, savings association, credit union, insurance company, or insurance agency). (This definition is used solely for the purpose of Form SBSE-A.)

INVOLVED - Doing an act or aiding, abetting, counseling, commanding, inducing, conspiring with or failing reasonably to supervise another in doing an act.

ORDER - A written directive issued pursuant to statutory authority and procedures, including orders of denial, suspension, or revocation; does not include special stipulations, undertakings or agreements relating to payments, limitations on activity or other restrictions unless they are included in an *order*.

PROCEEDING - Includes a formal administrative or civil action initiated by a governmental agency, *self-regulatory organization* or a *foreign financial regulatory authority*; a *felony* criminal indictment or information (or equivalent formal charge); or a *misdemeanor* criminal information (or equivalent formal charge). Does not include other civil litigation, investigations, or arrests or similar charges effected in the absence of a formal criminal indictment or information (or equivalent formation (or equivalent formal charge).

F	FORM SBSE-A Page 1 (Execution Page)	Swap De Participant	n for Registrat aler and Major that is Regist C as a Swap I Partic	[.] Security-bas ered or Regis Dealer or Maj	sed Swap stering with	Official Use	Official Use Only		
		Date:	Aj	oplicant NFA Numb	oer:				
WARN	VARNING: Failure to keep this form current and to file accurate supplementary information on a timely basis, or the failure to keep accurate books and records or otherwise to comply with the provisions of law applying to the conduct of business as an SBS Entity, would violate the Federal securities laws and the laws of the <i>jurisdictions</i> and may result in disciplinary, administrative, injunctive or criminal action.								
	INTENTIONAL MISSTA	TEMENTS OR O	MISSIONS OF FAC See 18 U.S.C. 1001 a		UTE FEDERAL C	RIMINAL VIOLATIONS.			
	[] APPLICATION [] AMENDMENT								
A.	xact name, principal busing Full name of the <i>applican</i> IRS Empl. Ident. No.:		iling address, if diffe	rent, and telephor	ne number of the	applicant:			
			-						
C.	Applicant's NFA ID #:		Applicant's CIK # ((if any):	Applican	t's UIC # (if any):	1		
D.	Applicant's Main Address Number and Street 1:	:: (Do not use a F	P.O. Box)	Number and S	Street 2:	Zip/Postal Code:			
E.	Mailing Address, if differe Number and Street 1:			Number and S	Street 2:				
F. G	City: Business Telephone Nun Website/URL:			Country:		Zip/Postal Code:			
-	Contact Employee: Name:			Title:					
	Telephone Number:			Email Address	8:				
I.	Chief Compliance Officer Name:	designated by th	ne applicant in acco	rdance with Excha Title:	ange Act Section	15F(k):			
	Telephone Number:			Email Address	:				
EXECUTION: The applicant consents that service of any civil action brought by or notice of any proceeding before the Securities and Exchange Commission in connection with the applicant's security-based swap activities, unless the applicant is a nonresident SBS Entity, may be given by registered or certified mail or confirmed telegram to the applicant's contact employee at the main address, or mailing address if different, given in Items 1E and 1F. If the applicant is a nonresident SBS Entity, it must complete Schedule F to designate a U.S. agent for service of process. The undersigned certifies that he/she has executed this form on behalf of, and with the authority of, said applicant. The undersigned and applicant represent that the information and statements contained herein, including schedules attached hereto, and other information filed herewith are current, true and complete. The undersigned and applicant further represent that to the extent any information previously submitted is not amended such information is currently accurate and complete.									
Date (MM/DD/YYYY) Name of Applicant									
Date (MM/DD/YYYY) Name of Applicant By:							—		
Dy.	Signature			Name and Title of	Person Signing or	n Applicant's behalf			
	Cignature		This page must always		r croon orgining of	וואסויקאיזי אישיויקאיזי	———————————————————————————————————————		
ļ		DO NOT WR	ITE BELOW THIS LI		AL USE ONLY				

F	ORN	I SBSE-A	Applicant Name:		Official	Use	Official Use Only			
	Ρ	age 2		olicant NFA No.:						
2.	А.	The applicant	s registering as a security-based swap	o dealer: [] Yes	[] No					
	В.	Because it: (ch	s registering as a major security-based eck all that apply) ntains a substantial security-based swa		[] No					
		[] has	substantial counterparty exposure	[] is highly leveraged relative	to its capital pos	ition				
3.	A.	 A. Is the <i>applicant</i> a foreign security-based swap dealer that intends to: work with the Commission and its primary regulator to have the Commission determine whether the requirements of its primary regulator's regulatory system are comparable to the Commission's []Yes []No avail itself of a previously granted substituted compliance determination []Yes []No with respect to the requirements of Section 15F of the Exchange Act of 1934 and the rules and regulations thereunder? 								
	В.	B. If " <i>yes</i> " to either of the questions in Item 3.A. above, identify the foreign financial regulatory authority that serves as the <i>applicant's</i> primary regulator and for which the Commission has made, or may make, a substituted compliance determination:								
	C.	C. If the applicant is relying on a previously granted substituted compliance determination, please describe how the applicant satisfies any conditions the Commission may have placed on such substituted compliance determination:								
4.	Does mode		end to compute capital or margin, or p Yes [] No	price customer or proprietary position	ns, using mather	natical				
5.	A.	The <i>applicant</i> [] Swap Dea	s currently registered with the Commo ler [] Major Swap Parti		is a:					
	В.	The <i>applicant</i> [] Swap Dea	s registering with the Commodity Futu ler [] Major Swap Parti							
6.			branch of a non-resident entity? on-resident entity and its location:	[] Yes	[] No					
7.	Briefly	v describe the a	oplicant's business:							
8.			f subject to regulation by a prudential r change Act. If "yes," identify the prude		39) of the	YES NO [] []				
9.		Is the applicar Applicant's IAF	t registered with the Commission as ar D #:	n investment adviser?		[] []				
10.	A.		registered with the Commodity Future er or major swap participant?	es Trading Commission in any capa	acity other than	[] []				
	В.	If "yes," as a:	[] Futures Commission Merchant[] Commodity Pool Operator	[] Introducing Broker] [] Other:						
11.			engage in any other non-securities, fi scribe each other business briefly on a		usiness?	[] []				
12.		Does the appl	cant hold or maintain any funds or sec	urities to collateralize counterparty	transactions?	[] []				

FORM SB			Applicant Name:				Official	Use		Offici Use Only
	Р	age 3	Date:		Applicant NFA No.: _					
13.		Does the appl	<i>icant</i> have any arrar	ngement:				YES	NO	I
	Α.	•	r <i>person</i> , firm, or org audited by such oth	•	•	or records of the app	<i>licant</i> are kept,	[]	[]	l
	В.	Under which such other person, firm or organization executes, trades, custodies, clears or settles on behalf of the applicant (including any SRO in which the applicant is a member)?							[]	l
		If "yes" to any part of Item 11, complete appropriate items on Schedule B, Section II.								ı
14.		Does any person directly or indirectly control the management or policies of the applicant through agreement or otherwise? If "yes," complete appropriate item on Schedule B, Section II.								
15.		Does any person directly or indirectly finance (wholly or partially) the business of the applicant? Do not answer "Yes" to Item 15 if the person finances the business of the applicant through: 1) a public offering of securities made pursuant to the Securities Act of 1933; or 2) credit extended in the ordinary course of business by suppliers, banks, and others. If "yes," complete appropriate item on Schedule B, Section II.							[]	
16.			nt at the time of this tomplete appropriate			a currently register	ed SBS Entity?	[]	[]	l
17.		Is the <i>applicant</i> registered with a foreign financial regulatory authority? If "yes," list all such registrations on Schedule F, Page 1, Section II.					[]	[]		
18.		• •	has principa t all principals who a							l
19.										1

	Schedule A of FORM								Official Use)
	SBSE-A PRINCIPALS THAT ARE	Applicant Name:								
(.	INDIVIDUALS	Date:			Appl	icant NF	A No.:			
`	(Answer for Form SBSE-A Item 18) Use Schedule A to identify all principals of the applicant who are individuals.									
USE										
	Complete the "Title or Status" column by entering board/management titles; status as partner, trustee, sole proprietor, or shareholder; and for shareholders, the class of securities owned (if more than one is issued).									
	Ownership Codes are: NA - less than 5%	P		00/	1	4h a 10 0				
	NA - less than 5% B - 10% but less than 25% D - 50% but less than 75% A - 5% but less than 10% C - 25% but less than 50% E - 75% or more									
	Otatus Assurant konon working house on indude					NFA Identification No., CRD No. and/or IARD No.	Official Use			
	(Individuals: Last Name, First Name, Middle Name)				for a	applicant	ownership interest in	ownership code		Only
			MM	YYYY	MM	YYYY	the applicant			
1.							Y/N			
		For individuals not presently re position - employer, job title, ar				CRD or IAF	RD, describe p	prior investmen	nt-related experience (e.g., for each	prior
2.			ſ		ſ		Y/N			
		For individuals not presently re	gistere	d through	NFA, C	RD or IAF	RD, describe p	prior investmen	nt-related experience (e.g., for each	prior
		position - employer, job title, ar	nd date	s of servic	e):	T	1			n
3.							Y / N			
		For individuals not presently re position - employer, job title, ar				CRD or IAF	RD, describe p	orior investmen	nt-related experience (e.g., for each	prior
		······································			-,-					
4.							Y / N			
		For individuals not presently re position - employer, job title, ar				CRD or IAF	RD, describe p	prior investmen	<i>nt-related</i> experience (e.g., for each	prior
5.							Y/N			
		For individuals not presently re	gistere	d through	NFA, C	RD or IAF	RD, describe p	prior investmen	nt-related experience (e.g., for each	prior
		position - employer, job title, ar	nd date	s of servic	e):					
6.							Y/N			
						CRD or IAF	RD, describe p	prior investmen	nt-related experience (e.g., for each	prior
		position - employer, job title, ar	nd date	s of servic	e):					
7.							Y / N			
		For individuals not presently re position - employer, job title, ar				CRD or IAF	RD, describe p	prior investmen	nt-related experience (e.g., for each	prior
8.							Y/N			
		For individuals not presently re	gistere	d through	NFA, C	RD or IAF		prior investmen	nt-related experience (e.g., for each	prior
		position - employer, job title, ar	nd date	s of servic	e):					
9.							Y / N			
		For individuals not presently re	gistere	d through	NFA, C	RD or IAF	RD, describe p	prior investmen	nt-related experience (e.g., for each	prior
		position - employer, job title, ar	nd date	s of servic	e):	I				I
10.							Y / N			
		For individuals not presently re position - employer, job title, ar				CRD or IAF	RD, describe p	prior investmen	nt-related experience (e.g., for each	prior

Schedule B of FORM	Applicant Name:			Official Use	Official Use Only			
SBSE-A Page 1	Date:	Applicant NF						
Use this Schedule B to report deta previously submitted details. Do n	ot repeat previously sub	mitted information.						
This is an [] INITIAL [] AME Section I Other Busines	5	e Form SBSE-A ite	ms checked below:		-			
Item 11: Does applicant engage in any other non-securities, financial services industry-related business?								
UIC (if any), or other Unique Identificati	-	Assigning Regula	-	15111655 !				
	.,	0 0 0						
Briefly describe any other financial services industry-related, non-securities business in which the applicant is engaged:								
	nance Arrangements /	-		Persons / Financings				
(Check one) [] Item 13A [] Item 13B [] Item 14 [] Item 15 Applicant must complete a separate Schedule B Page 1 for each affirmative response in this section including any multiple responses to any item. Complete the "Effective Date" box with the Month, Day and Year that the arrangement or agreement became effective. When reporting a change or termination of an arrangement, enter the effective date of the change.								
Firm or Organization Name			SEC File, CRD, NFA, IARD any)	, UIC, and/or CIK Number (if				
Business Address (Street, City, State/Country, Zip +	4 Postal Code)		Effective Date MM DD YYYY / /	Termination Date MM DD YYYY / /				
Individual Name			CRD, NFA, and/or IARD Nu	imber (if any)				
Business Address (if applicable) (Street, City, State/	Country, Zip + 4 Postal Code)		Effective Date MM DD YYYY / /	Termination Date MM DD YYYY / /				
Briefly describe the nature of the arrangement settlement arrangement (ITEM 13B); the nat side of this sheet for additional comments if n For ITEM 14 ONLY - If the control person is an indiv - employer, job title, and dates of service).	ure of the control or agreement necessary.	t (ITEM 14); or the metho	d and amount of financin	g (ITEM 15). Use reverse	-			
Section III Successions								
Item 16: Is the applicant at the time	e of this filing succeeding	g to the business of	a currently register	ed SBS Entity?	1			
Date of Succession MM DD YYYY / /	Name of Predecessor	- IDC Employee Number //f.e		· · · · · · · · · · · · · · · · · · ·				
SEC File, CRD, NFA, IARD, UIC, and/or CIK Number	er (if any)	IRS Employer Number (if a	iny)					
Briefly describe details of the succession incl comments if necessary.	uding any assets or liabilities r	not assumed by the succe	essor. Use reverse side o	of this sheet for additional				
Section IV Principals Effe	cting or Involved in Ef	fecting SBS Busin	iess					
Item 19: Does any principal not ide and Schedule A involved in effectir be involved in effecting such busin	ng security-based swaps ess on the applicant's be	s on behalf of the ap ehalf?	oplicant, or will such	n principals effect or				
For each Principal identified in Sec	-			evant DRP pages.				
1. Name of Principal		pe of Entity (Corp, Partnershi C, etc.)		D, NFA, IARD, CIK Number, UIC x Identification Number				
Business Address (Street, City, State/Country, Zip + 4/Postal Code)								
,	is involved in effecting	security based swa	aps on behalf of the	e applicant. (check only	$\uparrow \uparrow$			
one) Briefly describe the details of the principal's :								
applicant:			ng soouniy-based swdp i					

S	chedule B of FORM	Applicant Name:			Official Use	L	ficial Jse)nly		
	SBSE-A	Date:	Applicant NFA No.:						
Se	Page 2 ection IV, Continued	Principals Effecting	g or Involved in Effecting S	RS Rusiness		-	l T		
	each Principal identified in Sec		-				+		
2.	Name of Principal		Type of Entity (Corp, Partnership, LLC, etc.)	SEC File No., CRD, NFA, IARD, CIK Number, UIC (if any), and/or Tax Identification Number					
	Business Address (Street, City, State/Count	ntry, Zip + 4/Postal Code)							
	This entity [] <u>effects</u> []	is involved in effec	ting security based swaps o	n behalf of the	e applicant. (check only one)		1		
Briefly describe the details of the principal's activities relating to its effecting or involvement in effecting security-based swap transactions on behalf of the applicant:									
3.	Name of Principal		Type of Entity (Corp, Partnership, LLC, etc.)		D, NFA, IARD, CIK Number, UIC x Identification Number				
	Business Address (Street, City, State/Count	try, Zip + 4/Postal Code)				T			
	This entity [] <u>effects</u> []	is involved in effect	ting security based swaps o	n behalf of the	applicant. (check only one)				
	Briefly describe the details of the principal's activities relating to its effecting or involvement in effecting security-based swap transactions on behalf of the applicant:								
4.	Name of Principal		Type of Entity (Corp, Partnership, LLC, etc.)		D, NFA, IARD, CIK Number, UIC x Identification Number				
	Business Address (Street, City, State/Count	try, Zip + 4/Postal Code)							
	This entity [] effects []	is involved in effec	ting security based swaps o	n behalf of the	applicant. (check only one)				
	fly describe the details of the p p transactions on behalf of the		elating to its effecting or invo	lvement in effe	ecting security-based				
5.	Name of Principal		Type of Entity (Corp, Partnership, LLC, etc.)		D, NFA, IARD, CIK Number, UIC x Identification Number				
	Business Address (Street, City, State/Count	try, Zip + 4/Postal Code)	I						
	This entity [] effects []	is involved in effec	ting security based swaps o	n behalf of the	applicant. (check only one)				
	fly describe the details of the p p transactions on behalf of the		elating to its effecting or invo	lvement in effe	ecting security-based				
6.	Name of Principal		Type of Entity (Corp, Partnership, LLC, etc.)		D, NFA, IARD, CIK Number, UIC x Identification Number				
	Business Address (Street, City, State/Count	try, Zip + 4/Postal Code)	1	1		t	t		
	This entity [] <u>effects</u> []	is involved in effect	ting security based swaps o	n behalf of the	e applicant. (check only one)	t	T		
	This entity [] effects [] is involved in effecting security based swaps on behalf of the applicant. (check only one) Briefly describe the details of the principal's activities relating to its effecting or involvement in effecting security-based swap transactions on behalf of the applicant:								

Schedule C of FORM SBSE-A	<i>Applicant</i> Name:	Official Use
LIST OF 15Fb6-1 ENTITIES	Date: SEC Filer No:	

Each *applicant* shall use Schedule C to identify each person associated with it, as of the date it files an application to register with the Commission, that is not a natural person and that is subject to statutory disqualification (as described in Exchange Act Sections 3(a)(39)(A) through (F)) that the security-based swap dealer or security-based swap participant permits to effect or be involved in effecting security-based swaps on its behalf pursuant to Rule 15Fb6-1.

NAME	Official Use Only
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10.	

Schedule D of					Official Use						
FORM SBSE-A Page 1				Principal Name: Date:	Applicant NFA No.:						
lse f	he	annr	<u>,</u>		to the questions in Schedule D. Ref	er to the					
Expla	ana	tion	of Terms section of Form S	BSE-A Instructions for	explanations of italicized terms.						
	Α.	A. In the past ten years has the <i>principal</i> :									
ш		(1)	Been convicted of or pled court to any <i>felony</i> ?	guilty or nolo contende	re ("no contest") in a domestic, foreig	n or military	YES []	NO []			
SUR		(2)	Been charged with a felon	У			[]	[]			
0 CFO	В.	In th	ne past ten years has the p	rincipal:							
CRIMINAL DISCLOSURE		(1)	court to a misdemeanor in	volving: financial servic wrongful taking of prope	dere ("no contest") in a domestic, fore res <i>industry-related</i> business, or any f erty, bribery, perjury, forgery, counter offenses?	fraud, false	[]	[]			
່ວ		(2)	Been charged with a misd	emeanor specified in B	(1)?		[]	[]			
	C.	Has	the U.S. Securities and Ex	change Commission of	r the Commodity Futures Trading Col	mmission ever:					
z		(1)	Found the principal to have	e made a false stateme	ent or omission?		[]	[]			
CTIO		(2)	Found the principal to have	e been involved in a vic	blation of its regulations or statutes?		[]	[]			
REGULATORY ACTION DISCLOSURE		(3)	Found the principal to have authorization to do busines		ancial services industry-related busin restricted?	ess having its	[]	[]			
		(4)	Entered an order against t	he <i>principal</i> in connecti	on with financial services industry-rel	lated activity?	[]	[]			
		(5)	Imposed a civil money per activity?	nalty on the <i>principal</i> , or	r ordered the <i>principal</i> to cease and d	lesist from any	[]	[]			
	D.	Has	any other federal regulator	ry agency, state regulat	tory agency, or foreign financial regul	atory authority:					
		(1)	Ever found the <i>principal</i> to unethical?	have made a false sta	tement or omission or been dishones	t, unfair, or	[]	[]			
		(2)	Ever found the <i>principal</i> to regulations or statutes?	have been involved in	a violation of financial services indus	try-related	[]	[]			
JRE		(3)	Ever found the <i>principal</i> to having its authorization to	have been a cause of do business denied, su	a financial services industry-related b ispended, revoked or restricted?	ousiness	[]	[]			
CLOSI		(4)	In the past ten years, ente industry-related activity?	red an order against the	e <i>principal</i> in connection with a <i>financ</i>	cial services	[]	[]			
REGULATORY ACTION DISCLOSURE		(5)			l's registration or license or otherwise vices industry-related business or rest		[]	[]			
ACT	E.	Has	any self-regulatory organiz	zation or commodities e	exchange ever:						
RY,		(1)	found the principal to have	e made a false statemer	nt or omission?		[]	[]			
ILATO		(2)			lation of its rules (other than a violatic by the U.S. Securities and exchange		[]	[]			
REGU		(3)	found the principal to have authorization to do busines		nancial services industry-related busi revoked or restricted?	ness having its	[]	[]			
		(4)	Disciplined the <i>principal</i> by association with other mer		ng it from membership, barring or sus tricting its activities?	pending its	[]	[]			
	F.		the <i>principal's</i> authorization bked or suspended?	n to act as an attorney,	accountant, or federal contractor eve	er been	[]	[]			
	G.		ne <i>principal</i> now the subject t of C, D, or E?	of any regulatory proc	eeding that could result in a "yes" and	swer to any	[]	[]			

			e D of BSE-A		Applicant Name:					
	-	age	-	Date:						
ш	H. (1) Has any domestic or foreign civil judicial court:									
DISCLOSURE		(a)	In the past ter industry-relate	•	e principal in connection with any financial serv	vices	YES []	NO []		
		(b)	Ever found the statutes or reg		involved in a violation of financial services indu	ustry-related	[]	[]		
CIVIL JUDICIAL		(c)			ettlement agreement, a <i>financial services indust</i> st the <i>principal</i> by a state or foreign financial reg		[]	[]		
CIVI	(2)		ne <i>principal</i> nov iny part of H(1)		y civil judicial proceeding that could result in a "y	yes" answer	[]	[]		
	the	 In the past ten years has the <i>principal</i> ever been a securities firm or a <i>principal</i> of a securities firm that: 								
FINANCIAL	(1)	(1) Has been the subject of a bankruptcy petition?						[]		
FINANCIAL DISCLOSURE	(2)		s had a trustee estor Protectior		ect payment procedure initiated under the Secur	rities	[]	[]		

	Sc	hedule F of FORM	Applicant Name:		Official Use					
		SBSE-A	Date: Applicant NF	A No.:						
	Sec	tion I Service of Proc	ess and Certification Regarding Acce	ss to Records						
	 Each nonresident security-based swap dealer and non-resident security-based swap participant shall use Schedule F to identify the United States agent for service of process and the certify that it can as a matter of law, and will - (1) provide the Commission with prompt access to its books and records, and (2) submit to onsite inspection and examination by the Commission. 									
1.	Ser	vice of Process:								
	A.	Name of United States perso	n applicant designates and appoints as	agent for service of p	process					
	В.	Address of United States per	son applicant designates and appoints a	as agent for service o	f process					
		The above identified agent for s	ervice of process may be served any proc	ess, pleadings, subpo	enas, or other papers in					
		(a) any investigation or adminis <i>applicant</i> may have information	trative proceeding conducted by the Comn ; and	nission that relates to	the <i>applicant</i> or about which the					
		defendant or respondent, in an any of its territories or possessi agreed that any such suit, actic service of an administrative sub	ction or proceeding brought against the ap appropriate court in any place subject to ons or of the District of Columbia, to enforce n or administrative proceeding may be cor spoena shall be effected by service upon the ken and held in all courts and administrative.	the jurisdiction of any the the Exchange Act. nmenced by the servio ne above-named Ager	state or of the United States or of The <i>applicant</i> has stipulated and ce of process upon, and that t for Service of Process, and that					
2.	Cer	tification regarding access to	ecords:							
	App	licant can as a matter of law, a	and will;							
	(1) provide the Commission w	ith prompt access to its books and recor	ds, and						
	(submit to onsite inspectior	and examination by the Commission.							
	par		n SBSE a copy of the opinion of counsel ange Act Rule 15Fb2-4, as appropriate [
	Sig	nature:								
	Nan	ne and Title:								
	Date									
	Sec	tion II Registration with	Foreign Financial Regulatory Author	rities						
bas	ed s	wap dealer and major security-bas	tion with Foreign Financial Regulator, and swap participant that is registered with a f al regulatory authority with which it is register	oreign financial regulate	ory authority must list on Section II					
1										
· ⊧ 2	nglish	Name of Foreign Financial Regulatory Author	rity F	Foreign Registration No. (if any	English Name of Country:					
-	nglish	Name of Foreign Financial Regulatory Author	rity F	Foreign Registration No. (if any	English Name of Country:					
3 _										
	-	Name of Foreign Financial Regulatory Author		Foreign Registration No. (if any						
lf	If applicant has more than 3 Foreign Financial Regulatory Authorities to report, complete additional Schedule F Page 1s.									

CRIMINAL DISCLOSURE REPORTING PAGE (SBSE-A) **GENERAL INSTRUCTIONS** This Disclosure Reporting Page [DRP (SBSE)] is an [] INITIAL OR [] AMENDED response to report details for affirmative responses to Items A and B of Schedule D of Form SBSE-A; Check $[\sqrt{}]$ item(s) being responded to: A. In the past ten years has the principal: [] (1) Been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign or military court to any felony? [] (2) Been charged with a felony? B. In the past ten years has the principal: [] (1) Been convicted of or pled guilty or or nolo contendere ("no contest") in a domestic. foreign or militarv court to a misdemeanor involving: investments or an investment-related business, or any fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses? [] (2) Been charged with a misdemeanor specified in B(1)? Use a separate DRP for each event or proceeding. An event or proceeding may be reported for more than one person or entity using one DRP. File with a completed Execution Page. Multiple counts of the same charge arising out of the same event(s) should be reported on the same DRP. Unrelated criminal actions, including separate cases arising out of the same event, must be reported on separate DRPs. Use this DRP to report all charges arising out of the same event. One event may result in more than one affirmative answer to the above items. If a principal is an organization registered through the CRD, such principal need only complete Part I of the applicant's appropriate DRP (SBSE-A). Details of the event must be submitted on the principal's appropriate DRP (BD) or DRP (U-4). If a principal is an individual or organization not registered through the CRD, provide complete answers to all the items on the applicant's appropriate DRP (SBSE-A). The completion of this DRP does not relieve the principal of its obligation to update its CRD records. Applicants must attach a copy of each applicable court document (i.e., criminal complaint, information or indictment as well as judgment of conviction or sentencing documents) if not previously submitted through CRD (as they could be in the case of a control affiliate registered through CRD). Documents will not be accepted as disclosure in lieu of answering the questions on this DRP. PARTI If the principal is registered with the CRD, provide the CRD number. If not, indicate "non-registered" by checking the Α. appropriate checkbox. Name of Principal

.

CRD NUMBER

Registered: [] Yes [] No

- [] This DRP should be removed from the SBS Entity's record because the principal is no longer associated with the SBS Entity.
- B. If the *principal* is registered through the CRD, has the *principal* submitted a DRP (with Form U-4) or DRP (BD) to the CRD System for the event?

If the answer is "Yes," no other information on this DRP must be provided: If "No," complete Part II.

[] Yes [] No

Note: The completion of this Form does not relieve the principal of its obligation to update its CRD records.

CRIMINAL DISCLOSURE REPORTING PAGE (SBSE-A)

						•
 ົ	n	n	Uá	stı	\mathbf{n}	nı
 -0	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		uc	711	U	

	rmal Charge(s) were brought in: (include name of Federal, Military, State or Foreign Court, Location of Court County and State or Country, Docket/Case number).
Eve	ent Disclosure Detail (Use this for both organizational and individual charges.)
A.	Date First Charged (MM/DD/YYYY): [] Exact [] Explanation
lf n	ot exact, provide explanation:
В.	Event Disclosure Detail (include Charge(s)/Charge Description(s), and for each charge provide: <u>1</u> . number counts, <u>2</u> . <i>felony</i> or <i>misdemeanor</i> , <u>3</u> . plea for each charge, and <u>4</u> . product type if charge is <i>investment-rela</i> .
С.	Current status of the Event? [] Pending [] On Appeal [] Final
D.	Event Status Date (complete unless status is [] Exact [] Explana Pending) (MM/DD/YYYY):
lf n	ot exact, provide explanation:
pre	sposition Disclosure Detail: Include for each charge, <u>A.</u> Disposition Type [e.g., convicted, acquitted, dismissentrial.], <u>B.</u> Date, <u>C.</u> Sentence/Penalty, <u>D.</u> Duration [if sentence-suspension, probation, etc.], <u>E.</u> Start Date of P Penalty/Fine Amount and <u>G.</u> Date Paid.
 Pro	by b
dat	tes when the conduct which was the subject of the charge(s) occurred. (The information must fit within the spovided.)

REGULATORY ACTION DISCLOSURE REPORTING PAGE (SBSE-A)

GENERAL INSTRUCTIONS
This Disclosure Reporting Page [DRP (SBSE)] is an [] INITIAL OR [] AMENDED response to report details for affirmative
responses to <i>Items C, D, E, F, or G</i> of Schedule D of Form SBSE-A;
Check [√] item(s) being responded to:
C. Has the U.S. Securities and Exchange Commission or the Commodity Futures Trading Commission ever:
[] (1) Found the principal to have made a false statement or omission?
[] (2) Found the principal to have been involved in a violation of its regulations or statutes?
[] (3) the principal to have been a cause of an investment-related business having its authorization to do business denied, revoked, or restricted?
[] (4) Entered an order against the principal in connection with investment-related activity?
[] (5) Imposed a civil money penalty on the principal, or ordered the principal to cease and desist from any activity?
D. Has any other federal regulatory agency, state regulatory agency, or foreign financial regulatory authority:
[] (1) Ever found the principal to have made a false statement or omission or been dishonest, unfair, or unethical?
[] (2) Ever found the principal to have been involved in a violation of investment-related regulations or statutes?
[] (3) Ever found the principal to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked or restricted?
[] (4) In the past ten years, entered an order against the principal in connection with an investment-related activity?
[] (5) Ever denied, suspended, or revoked the principal's registration or license or otherwise, by order, prevented it from associating with an investment-related business or restricted its activities?
E. Has any self-regulatory organization or commodities exchange ever:
[] (1) found the principal to have made a false statement or omission?
[] (2) found the principal to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the U.S. Securities and exchange Commission)?
[] (3) found the principal to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked or restricted?
[] (4) Disciplined the principal by expelling or suspending it from membership, barring or suspending its association with other members, or otherwise restricting its activities?
F. [] Has the principal's authorization to act as an attorney, accountant, or federal contractor ever been revoked or suspended?
G. [] Is the principal now the subject of any regulatory proceeding that could result in a "yes" answer to any part of C, D, or E?
Use a separate DRP for each event or <i>proceeding</i> . An event or <i>proceeding</i> may be reported for more than one person or entity using one DRP. File with a completed Execution Page.
One event may result in more than one affirmative answer to Items C, D, E, F or G. Use only one DRP to report details related to the same event. If an event gives rise to actions by more than one regulator, provide details for each action on a separate DRP.
It is not a requirement that documents be provided for each event or proceeding. Should they be provided, they will not be accepted as disclosure in lieu of answering the questions on this DRP.
If the principal is an organization registered through the CRD, such principal need only complete Part I of the <i>applicant's</i> appropriate DRP (SBSE). Details of the event must be submitted on the <i>principal's</i> appropriate DRP (BD) or DRP (U-4). If a <i>principal</i> is an organization <u>not</u> registered through the CRD, provide complete answers to all the items on the <i>applicant's</i> appropriate DRP (SBSE). The completion of this DRP does not relieve the <i>principal</i> of its obligation to update its CRD records.
PARTI
A little and a single and with the ODD and the ODD and has the start indicate from a single and the

Α. If the *principal* is registered with the CRD, provide the CRD number. If not, indicate "non-registered" by checking the appropriate checkbox.

Name of <i>Principal</i>	Principal's CRD Number
--------------------------	------------------------

Registered: [] Yes [] No

- [] This DRP should be removed from the SBS Entity record because the control affiliate(s) are no longer associated with the SBS Entity.
- Β. If the principal is registered through the CRD, has the principal submitted a DRP (with Form U-4) or DRP (BD) to the CRD System for the event?

If the answer is "Yes," no other information on this DRP must be provided: If "No," complete Part II.

[] Yes [] No

Note: The completion of this Form does not relieve the principal of its obligation to update its CRD records.

REGULATORY ACTION DISCLOSURE REPORTING PAGE (SBSE-A)

RT II			
Regulatory Action initiated	l by:		
[] SEC [] Other	Federal [] State	e []SRO [] Foreign
(Full name of regulator, fo			
Principal Sanction: (chec	k appropriate item)		
[] Civil and Administration	ve Penalty(ies)/Fine(s)	[] Disgorgement	[] Restitution
[] Bar		[] Expulsion	[] Revocation
[] Cease and Desist		[] Injunction	[] Suspension
[] Censure		[] Prohibition	[] Undertaking
[] Denial		[] Reprimand	[] Other
Other Sanctions:			
Date Initiated (MM/DD/YY	YY)		[] Exact [] Explanation
If not exact, provide expla	nation:		┛
· · ·			
Docket/Case Number:			
Docket/Case Number: Principal Employing Firm	when activity occurred v	which led to the regulator	ry action (if applicable):
	-	which led to the regulator	ry action (if applicable):
Principal Employing Firm Principal Product Type: (e	check appropriate item)	-	
Principal Employing Firm Principal Product Type: (c [] Annuity(ies) - Fixed	check appropriate item) [] Debt - Munic	cipal	[] Investment Contract(s)
Principal Employing Firm Principal Product Type: (n [] Annuity(ies) - Fixed [] Annuity(ies) - Variable	check appropriate item) [] Debt - Munic ? [] Derivative(s)	cipal)	[] Investment Contract(s) [] Money Market Fund(s)
Principal Employing Firm Principal Product Type: (d [] Annuity(ies) - Fixed [] Annuity(ies) - Variable [] Banking Products (oth	check appropriate item) [] Debt - Munic e [] Derivative(s) her [] Direct Invest	cipal) tment(s) – DPP & LP Inte	[] Investment Contract(s) [] Money Market Fund(s)
Principal Employing Firm Principal Product Type: (n [] Annuity(ies) - Fixed [] Annuity(ies) - Variable	check appropriate item) [] Debt - Munic [] Derivative(s) her [] Direct Invest [] Equity - OTC	cipal) tment(s) – DPP & LP Inte C	[] Investment Contract(s) [] Money Market Fund(s) erest(s) [] Mutual Fund(s) [] No Product
Principal Employing Firm Principal Product Type: (d [] Annuity(ies) - Fixed [] Annuity(ies) - Variable [] Banking Products (oth than CD(s))	check appropriate item) [] Debt - Munic [] Derivative(s) her [] Direct Invest [] Equity - OTC [] Equity Listed	cipal) tment(s) – DPP & LP Inte C d (Common & Preferred	[] Investment Contract(s) [] Money Market Fund(s) erest(s) [] Mutual Fund(s) [] No Product
Principal Employing Firm Principal Product Type: (c [] Annuity(ies) - Fixed [] Annuity(ies) - Variable [] Banking Products (other than CD(s)) [] CD(s)	check appropriate item) [] Debt - Munic [] Derivative(s) her [] Direct Invest [] Equity - OTC	cipal) tment(s) – DPP & LP Inte C d (Common & Preferred ommodity	[] Investment Contract(s) [] Money Market Fund(s) erest(s) [] Mutual Fund(s) [] No Product Stock) [] Options
Principal Employing Firm Principal Product Type: (d [] Annuity(ies) - Fixed [] Annuity(ies) - Variable [] Banking Products (oth than CD(s)) [] CD(s) [] CD(s) [] Commodity Option(s) [] Debt – Asset Backed [] Debt - Corporate	check appropriate item) [] Debt - Munic [] Derivative(s) her [] Direct Invest [] Equity - OTC [] Equity Listed [] Futures - Co	cipal) tment(s) – DPP & LP Inte C d (Common & Preferred ommodity nancial	[] Investment Contract(s) [] Money Market Fund(s) erest(s) [] Mutual Fund(s) [] No Product Stock) [] Options [] Penny Stock(s)
Principal Employing Firm Principal Product Type: ([] Annuity(ies) - Fixed [] Annuity(ies) - Variable [] Banking Products (oth than CD(s)) [] CD(s) [] Commodity Option(s) [] Debt – Asset Backed	check appropriate item) [] Debt - Munic [] Derivative(s) her [] Direct Invest [] Equity - OTC [] Equity Listed [] Futures - Co [] Futures - Fir	cipal) tment(s) – DPP & LP Inte C d (Common & Preferred ommodity nancial	[] Investment Contract(s) [] Money Market Fund(s) erest(s) [] Mutual Fund(s) [] No Product Stock) [] Options [] Penny Stock(s) [] Unit Investment Trust(s)
Principal Employing Firm Principal Product Type: (d] Annuity(ies) - Fixed] Annuity(ies) - Variable] Banking Products (oth than CD(s))] CD(s)] CD(s)] Commodity Option(s)] Debt – Asset Backed] Debt - Corporate] Debt - Government	check appropriate item) [] Debt - Munic [] Derivative(s) her [] Direct Invest [] Equity - OTC [] Equity Listed [] Futures - Co [] Futures - Fir [] Index Optior	cipal) tment(s) – DPP & LP Inte C d (Common & Preferred ommodity nancial	[] Investment Contract(s) [] Money Market Fund(s) erest(s) [] Mutual Fund(s) [] No Product Stock) [] Options [] Penny Stock(s) [] Unit Investment Trust(s)
Principal Employing Firm Principal Product Type: (d [] Annuity(ies) - Fixed [] Annuity(ies) - Variable [] Banking Products (oth than CD(s)) [] CD(s) [] CD(s) [] Commodity Option(s) [] Debt – Asset Backed [] Debt - Corporate	check appropriate item) [] Debt - Munic [] Derivative(s) her [] Direct Invest [] Equity - OTC [] Equity Listed [] Futures - Co [] Futures - Fir [] Index Optior	cipal) tment(s) – DPP & LP Inte C d (Common & Preferred ommodity nancial	[] Investment Contract(s) [] Money Market Fund(s) erest(s) [] Mutual Fund(s) [] No Product Stock) [] Options [] Penny Stock(s) [] Unit Investment Trust(s)
Principal Employing Firm Principal Product Type: (4 [] Annuity(ies) - Fixed [] Annuity(ies) - Variable [] Banking Products (oth than CD(s)) [] CD(s) [] CD(s) [] Commodity Option(s) [] Debt – Asset Backed [] Debt – Corporate [] Debt - Government Other Product Type:	check appropriate item) [] Debt - Munic [] Derivative(s) her [] Direct Invest [] Equity - OTO [] Equity Listed [] Futures - Co [] Futures - Fir [] Index Option [] Insurance	cipal) tment(s) – DPP & LP Inte C d (Common & Preferred ommodity nancial n(s)	[] Investment Contract(s) [] Money Market Fund(s) erest(s) [] Mutual Fund(s) [] No Product Stock) [] Options [] Penny Stock(s) [] Unit Investment Trust(s) [] Other
Principal Employing Firm Principal Product Type: (4 [] Annuity(ies) - Fixed [] Annuity(ies) - Variable [] Banking Products (oth than CD(s)) [] CD(s) [] CD(s) [] Commodity Option(s) [] Debt – Asset Backed [] Debt – Corporate [] Debt - Government Other Product Type:	check appropriate item) [] Debt - Munic [] Derivative(s) her [] Direct Invest [] Equity - OTO [] Equity Listed [] Futures - Co [] Futures - Fir [] Index Option [] Insurance	cipal) tment(s) – DPP & LP Inte C d (Common & Preferred ommodity nancial n(s)	[] Investment Contract(s) [] Money Market Fund(s) erest(s) [] Mutual Fund(s) [] No Product Stock) [] Options [] Penny Stock(s) [] Unit Investment Trust(s)
Principal Employing Firm Principal Product Type: (4 [] Annuity(ies) - Fixed [] Annuity(ies) - Variable [] Banking Products (oth than CD(s)) [] CD(s) [] CD(s) [] Commodity Option(s) [] Debt – Asset Backed [] Debt – Corporate [] Debt - Government Other Product Type:	check appropriate item) [] Debt - Munic [] Derivative(s) her [] Direct Invest [] Equity - OTC [] Equity Listed [] Futures - Co [] Futures - Fir [] Index Option [] Insurance	cipal) tment(s) – DPP & LP Inte C d (Common & Preferred ommodity nancial n(s)	[] Investment Contract(s) [] Money Market Fund(s) erest(s) [] Mutual Fund(s) [] No Product Stock) [] Options [] Penny Stock(s) [] Unit Investment Trust(s) [] Other
Principal Employing Firm Principal Product Type: (4 [] Annuity(ies) - Fixed [] Annuity(ies) - Variable [] Banking Products (oth than CD(s)) [] CD(s) [] CD(s) [] Commodity Option(s) [] Debt – Asset Backed [] Debt – Corporate [] Debt - Government Other Product Type:	check appropriate item) [] Debt - Munic [] Derivative(s) her [] Direct Invest [] Equity - OTC [] Equity Listed [] Futures - Co [] Futures - Fir [] Index Option [] Insurance	cipal) tment(s) – DPP & LP Inte C d (Common & Preferred ommodity nancial n(s)	[] Investment Contract(s) [] Money Market Fund(s) erest(s) [] Mutual Fund(s) [] No Product Stock) [] Options [] Penny Stock(s) [] Unit Investment Trust(s) [] Other
Principal Employing Firm Principal Product Type: (4 [] Annuity(ies) - Fixed [] Annuity(ies) - Variable [] Banking Products (oth than CD(s)) [] CD(s) [] CD(s) [] Commodity Option(s) [] Debt – Asset Backed [] Debt – Corporate [] Debt - Government Other Product Type:	check appropriate item) [] Debt - Munic [] Derivative(s) her [] Direct Invest [] Equity - OTC [] Equity Listed [] Futures - Co [] Futures - Fir [] Index Option [] Insurance	cipal) tment(s) – DPP & LP Inte C d (Common & Preferred ommodity nancial n(s)	[] Investment Contract(s) [] Money Market Fund(s) erest(s) [] Mutual Fund(s) [] No Product Stock) [] Options [] Penny Stock(s) [] Unit Investment Trust(s) [] Other
Principal Employing Firm Principal Product Type: (4 [] Annuity(ies) - Fixed [] Annuity(ies) - Variable [] Banking Products (oth than CD(s)) [] CD(s) [] CD(s) [] Commodity Option(s) [] Debt – Asset Backed [] Debt – Corporate [] Debt - Government Other Product Type:	check appropriate item) [] Debt - Munic [] Derivative(s) her [] Direct Invest [] Equity - OTC [] Equity Listed [] Futures - Co [] Futures - Fir [] Index Option [] Insurance	cipal) tment(s) – DPP & LP Inte C d (Common & Preferred ommodity nancial n(s)	[] Investment Contract(s) [] Money Market Fund(s) erest(s) [] Mutual Fund(s) [] No Product Stock) [] Options [] Penny Stock(s) [] Unit Investment Trust(s) [] Other
Principal Employing Firm Principal Product Type: (a [] Annuity(ies) - Fixed [] Annuity(ies) - Variable [] Banking Products (oth than CD(s)) [] CD(s) [] CD(s) [] Commodity Option(s) [] Debt – Asset Backed [] Debt – Corporate [] Debt - Government Other Product Type: Describe the allegations re	check appropriate item) [] Debt - Munic [] Derivative(s) her [] Direct Invest [] Equity - OTC [] Equity Listed [] Futures - Co [] Futures - Fir [] Index Optior [] Insurance	cipal) tment(s) – DPP & LP Inte C d (Common & Preferred ommodity hancial h(s) action. (The information	[] Investment Contract(s) [] Money Market Fund(s) erest(s) [] Mutual Fund(s) [] No Product Stock) [] Options [] Penny Stock(s) [] Unit Investment Trust(s) [] Other
Principal Employing Firm Principal Product Type: (a [] Annuity(ies) - Fixed [] Annuity(ies) - Variable [] Banking Products (oth than CD(s)) [] CD(s) [] CD(s) [] Commodity Option(s) [] Debt – Asset Backed [] Debt – Corporate [] Debt - Government Other Product Type: Describe the allegations re	check appropriate item) [] Debt - Munic [] Derivative(s) her [] Direct Invest [] Equity - OTC [] Equity Listed [] Futures - Co [] Futures - Fir [] Index Option [] Insurance	cipal) tment(s) – DPP & LP Inte C d (Common & Preferred ommodity hancial h(s) action. (The information	[] Investment Contract(s) [] Money Market Fund(s) erest(s) [] Mutual Fund(s) [] No Product Stock) [] Options [] Penny Stock(s) [] Unit Investment Trust(s) [] Other

REGULATORY ACTION DISCLOSURE REPORTING PAGE (SBSE-A)

(continuation)

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.

10.	Ho	w was matter resolved: (check a	ppropriate iten	n)					
	[]	Acceptance, Waiver & Consent Decision & Order of Offer of Se Decision	ttlement [] Consent] Dismissed] Order	[] Settled[] Stipulation and Consent[] Vacated				
¹ 11.	Re	solution Date (MM/DD/YYYY)			[] Exact [] Explanation				
	lf n	ot exact, provide explanation:							
12.	Α.	Were any of the following Sanctions Ordered? (Check all appropriate items):							
		[] Monetary/Fine [Amount \$ [-	Expulsion/Denial []Cease and Desi	[] Disgorgement/Restitution st/Injunction [] Bar [] Suspension				
	В.	Other Sanctions Ordered:							
	C.	(General Securities Principal, F condition of the sanction, provid condition has been satisfied. If	inancial Opera de length of tim disposition res	ations Principal, etc.). If ne given to re-qualify/retr sulted in a fine, penalty,	cluding start date and capacities affected requalification, by exam/retraining was a rain, type of exam required and whether restitution, disgorgement or monetary date paid and if any portion of penalty was				
13.		wide a brief summary of details r	elated to the a	ction status and (or) disr	position and include relevant terms,				
10.		nditions and dates. (The informa							

	CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (SBSE-A)
	GENERAL INSTRUCTIONS
	This Disclosure Reporting Page [DRP (SBSE-A)] is an [] INITIAL OR [] AMENDED response to report details for affirmative responses to Item H of Schedule D of Form SBSE-A;
	Check $[v]$ item(s) being responded to:
	H(1) Has any domestic or foreign civil judicial court:
	[] (a) in the past ten years, enjoined the principal in connection with any investment-related activity?
	 (b) ever found that the principal was involved in a violation of investment-related statutes or regulations?
	 (c) ever dismissed, pursuant to a settlement agreement, an investment-related civil judicial action brought against the principal by a state or foreign financial regulatory authority?
	H(2) [] Is the principal now the subject of any civil judicial proceeding that could result in a "yes" answer to any part of H?
	separate DRP for each event or <i>proceeding</i> . An event or <i>proceeding</i> may be reported for more than one person or entity using one File with a completed Execution Page.
	vent may result in more than one affirmative answer to Item H. Use only one DRP to report details related to the same event. ated civil judicial actions must be reported on separate DRPs.
	ot a requirement that documents be provided for each event or proceeding. Should they be provided, they will not be accepted as sure in lieu of answering the questions on this DRP.
approj organi	<i>incipal</i> is an individual or organization registered through the CRD, such <i>principal</i> need only complete Part I of the <i>applicant's</i> oriate DRP (SBSE-A). Details of the event must be submitted on the <i>principal's</i> appropriate DRP (BD) or DRP (U-4). If a <i>principal</i> is an zation <u>not</u> registered through the CRD, provide complete answers to all the items on the <i>applicant's</i> appropriate DRP (SBSE-A). The etion of this DRP does not relieve the <i>principal</i> of its obligation to update its CRD records.
PAF	
Α.	If the <i>principal</i> is registered with the CRD, provide the CRD number. If not, indicate "non-registered" by checking the appropriate checkbox.
	Name of Principal
	CRD NUMBER

Registered: [] Yes [] No

- [] This DRP should be removed from the SBS Entity's record because the principal is no longer associated with the SBS Entity.
- B. If the *principal* is registered through the CRD, has the *principal* submitted a DRP (with Form U-4) or DRP (BD) to the CRD System for the event?

If the answer is "Yes," no other information on this DRP must be provided: If "No," complete Part II.

[] Yes [] No

Note: The completion of this Form does not relieve the principal of its obligation to update its CRD records.

CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (SBSE-A)

1	(continuation)
PA	
1.	Court Action initiated by: (Name of regulator, foreign financial regulatory authority, SRO, commodities exchange, agency, firm, private plaintiff, etc.)
2.	Principal Relief Sought: (check appropriate item)
	[] Cease and Desist [] Disgorgement [] Money Damages (Private/Civil Complaint) [] Restraining Order [] Civil Penalty(ies)/Fine(s) [] Injunction [] Restitution [] Other Other Relief Sought: [] Other [] Other
а З.	Filing Date of Court Action (MM/DD/YYYY)
	If not exact, provide explanation:
4.	Principal Product Type: (check appropriate item)
	[] Annuity(ies) - Fixed [] Debt - Municipal [] Investment Contract(s) [] Annuity(ies) - Variable [] Derivative(s) [] Money Market Fund(s) [] Banking Products (other than CD(s)) [] Direct Investment(s) - DPP & LP Interest(s) [] Mutual Fund(s) [] CD(s) [] Equity - OTC [] No Product [] Commodity Option(s) [] Futures - Commodity [] Options [] Debt - Asset Backed [] Futures - Financial [] Unit Investment Trust(s) [] Debt - Corporate [] Index Option(s) [] Insurance
5.	Other Product Type: Formal Action was brought in (include name of Federal, State or Foreign Court, Location of Court – City or County and State or Country, Docket/Case Number):
6.	Control Affiliate Employing Firm when activity occurred which led to the civil judicial action (if applicable):
7.	Describe the allegations related to this civil action. (The information must fit within the space provided.):
8.	Current Status? [] Pending [] On Appeal [] Final
9.	If on appeal, action appealed to (provide name of court): Date Appeal Filed (MM/DD/YYYY):
10.	If pending, date notice/process was served (MM/DD/YYYY) [] [] Exact [] Explanation
	If not exact, provide explanation:

CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (SBSE-A) (continuation)

How was matter resolved: (check appropriate item) [] Consent [] Judgement Rendered [] Settled [] Dismissed [] Opinion [] Withdrawn [] Other Resolution Date (MM/DD/YYYY) [] Exact [] Explanation If not exact, provide explanation: Resolution Detail A. A. Were any of the following Sanctions Ordered or Relief Granted? (Check all appropriate items): [] Monetary/Fine [] Censure [] Monetary/Fine [] Censure [] Cease and Desist/Injunction [] Bar [] Suspensi B. Other Sanctions: [] C. Sanction Detail f Suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification, by exam/retraining was a condition of the sanction, provide length of time given to re-qualify/terain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disporgement or monetary compensation, provide total amount, portion resulted against principal, date paid and if any portion of penalty was waived. Provide a brief summary of details related to action(\$), allegation(\$), disposition(\$), and/or finding(\$) disclosed above (The information must fit within the space provided.)	nal oi	r On Appea	l, complete all	items below.	For Pending Act	ions, complete Item 14 only.
Image: Second	How	w was matter	resolved: (check	appropriate iten	ו)	
If not exact, provide explanation: Resolution Detail A. Were any of the following Sanctions Ordered or Relief Granted? (Check all appropriate items): [] Monetary/Fine [] Revocation/Expulsion/Denial [] Disgorgement/Restitution Amount \$ [] Censure [] Cease and Desist/Injunction [] Bar [] Suspensi B. Other Sanctions: C. Sanction Detail: If suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification, by exam/retraining was a condition of the sanction, provide length of time given to re-qualify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against prinicpal, date paid and if any portion of penalty was waived.						[] Other
Resolution Detail A. Were any of the following Sanctions Ordered or Relief Granted? (Check all appropriate items): [] Monetary/Fine [] Revocation/Expulsion/Denial [] Disgorgement/Restitution Amount \$ [] Censure [] Cease and Desist/Injunction [] Bar [] Suspensi B. Other Sanctions: [] Censure [] Cease and Desist/Injunction [] Bar [] Suspensi C. Sanction Detail: If suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification, by exam/retraining was a condition of the sanction, provide length of time given to re-qualify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against prinicpal, date paid and if any portion of penalty was waived.	Res	solution Date	(MM/DD/YYYY)			[] Exact [] Explanation
 A. Were any of the following Sanctions Ordered or Relief Granted? (Check all appropriate items): [] Monetary/Fine [] Revocation/Expulsion/Denial [] Disgorgement/Restitution Amount \$ [] Censure [] Cease and Desist/Injunction [] Bar [] Suspensi B. Other Sanctions: C. Sanction Detail: If suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification, by exam/retraining was a condition of the sanction, provide length of time given to re-qualify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against principal, date paid and if any portion of penalty was waived. 	lf no	ot exact, provi	ide explanation:			
[] Monetary/Fine [] Revocation/Expulsion/Denial [] Disgorgement/Restitution Amount \$ [] Censure [] Cease and Desist/Injunction [] Bar [] Suspensi B. Other Sanctions: C. Sanction Detail: If suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification, by exam/retraining was a condition of the sanction, provide length of time given to re-qualify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against prinicpal, date paid and if any portion of penalty was waived. Provide a brief summary of details related to action(s), allegation(s), disposition(s), and/or finding(s) disclosed above	Res	solution Detail				
Amount \$ [] Censure [] Cease and Desist/Injunction [] Bar [] Suspensition B. Other Sanctions: C. Sanction Detail: If suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification, by exam/retraining was a condition of the sanction, provide length of time given to re-qualify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against prinicpal, date paid and if any portion of penalty was waived. Provide a brief summary of details related to action(s), allegation(s), disposition(s), and/or finding(s) disclosed above	Α.	Were any of	the following Sar	nctions Ordered	or Relief Granted? (Check all appropriate items):
C. Sanction Detail: If suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification, by exam/retraining was a condition of the sanction, provide length of time given to re-qualify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against principal, date paid and if any portion of penalty was waived.	D	Amount	\$[-	-	
(General Securities Principal, Financial Operations Principal, etc.). If requalification, by exam/retraining was a condition of the sanction, provide length of time given to re-qualify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against prinicpal, date paid and if any portion of penalty was waived.	Б.	Other Sancti	0115.			
		(General Sec condition of t condition has compensation	curities Principal, the sanction, prov s been satisfied.	Financial Opera /ide length of tim If disposition res	tions Principal, etc.). the given to re-qualify/ sulted in a fine, penal	If requalification, by exam/retraining was a /retrain, type of exam required and whether lty, restitution, disgorgement or monetary
		warvea.				
(The information must fit within the space provided.)	Prov	vide a brief su	ummary of details	related to action	n(s), allegation(s), dis	sposition(s), and/or finding(s) disclosed abov
	(The	e information	must fit within the	e space provideo	l.)	

BANKRUPTCY / SIPC DISCLOSURE REPORTING PAGE (SBSE-A) GENERAL INSTRUCTIONS

This Disclosure Reporting Page [DRP (SBSE-A)] is an an [] INITIAL **OR**[] AMENDED response to report details for affirmative responses to **Questions I** on Schedule D of Form SBSE-A;

Check $\llbracket v \rrbracket$ item(s) being responded to:

I In the past ten years has the *principal* ever been a securities firm or a *control affiliate* of a securities firm that:

- [] (1) has been the subject of a bankruptcy petition?
- [] (2) has had a trustee appointed or a direct payment procedure initiated under the Securities Investor Protection Act?

Use a separate DRP for each event or *proceeding*. An event or *proceeding* may be reported for more than one person or entity using one DRP. File with a completed Execution Page.

It is not a requirement that documents be provided for each event or *proceeding*. Should they be provided, they will not be accepted as disclosure in lieu of answering the questions on this DRP.

If a *principal* is an individual or organization registered through CRD, such *principal* need only complete Part I of the *applicant's* appropriate DRP (SBSE-A). Details of the event must be submitted on the *principal's* appropriate DRP (BD) or DRP (U-4). If a *principal* is an organization not registered through the CRD, provide complete answers to all the items on the *applicant's* appropriate DRP (SBSE-a). The completion of this DRP does <u>not</u> relieve the *principal* of its obligation to update its CRD records.

PART I

A. If the *principal* is registered with the CRD, provide the CRD number. If not, indicate "non-registered" by checking the appropriate checkbox.

Name of <i>Principal</i>
CRD NUMBER
Registered: [] Yes [] No
[] This DRP should be removed from the SBS Entity's record because the principal is no longer associated with the SBS Entity.

B. If the *principal* is registered through the CRD, has the *principal* submitted a DRP (with Form U-4) or DRP (BD) to the CRD System for the event?

If the answer is "Yes," no other information on this DRP must be provided: If "No," complete Part II.

[] Yes [] No

Note: The completion of this Form does not relieve the principal of its obligation to update its CRD records.

_____ [] Exact

[] Explanation

If not exact, provide explanation:

BANKRUPTCY / SIPC DISCLOSURE REPORTING PAGE (SBSE-A) (continuation)

٦

If the financial action relates to an organization over which the *applicant* or the *control affiliate* exercise(d) *control*, enter organization name and the applicant's or control affiliate's position, title or relationship: 3.

Country), Docket/Case Number and Bankruptcy Chapter Number (if Federal Bankruptcy Filing):		
Country), Docket/Čase Number and Bankruptcy Chapter Number (if Federal Bankruptcy Filing): Is action currently pending? [] Yes [] No If not pending, provide Disposition Type: (check appropriate item) [] Direct Payment Procedure [] Dismissed [] Satisfied/Released [] Discharged [] Dissolved [] SIPA Trustee Appointed [] Other Disposition Date (MM/DD/YYYY): [] Explanation If not exact, provide explanation:		Was the Organization investment-related? [] Yes [] No
If not pending, provide Disposition Type: (check appropriate item) [] Direct Payment Procedure [] Dismissed [] Satisfied/Released [] Discharged [] Dissolved [] SIPA Trustee Appointed [] Other Disposition Date (MM/DD/YYYY): [] Exact [] Explanation If not exact, provide explanation: Provide a brief summary of events leading to the action and if not discharged, explain. (The information must fit within the space provided.):	-	Court action brought in (Name of Federal, State or Foreign Court), Location of Court (City or County <u>and</u> State or Country), Docket/Case Number and Bankruptcy Chapter Number (if Federal Bankruptcy Filing):
If not pending, provide Disposition Type: (check appropriate item) [] Direct Payment Procedure [] Dismissed [] Satisfied/Released [] Discharged [] Dissolved [] SIPA Trustee Appointed [] Other Disposition Date (MM/DD/YYYY): [] Exact [] Explanation If not exact, provide explanation: Provide a brief summary of events leading to the action and if not discharged, explain. (The information must fit within the space provided.):	_	
[] Direct Payment Procedure [] Dismissed [] Satisfied/Released [] Discharged [] Dissolved [] SIPA Trustee Appointed [] Other Disposition Date (MM/DD/YYYY): [] Exact [] Explanation If not exact, provide explanation:		Is action currently pending? [] Yes [] No
If not exact, provide explanation:		[] Direct Payment Procedure [] Dismissed [] Satisfied/Released
If not exact, provide explanation:		Disposition Date (MM/DD/YYYY): [] Exact [] Explanation
within the space provided.):		
paid by you; or the name of the trustee: Currently open? [] Yes [] No Date Direct Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): [] Exact [] Explana If not exact, provide explanation:		
paid by you; or the name of the trustee: Currently open? [] Yes [] No Date Direct Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): [] Exact [] Explana If not exact, provide explanation:		
paid by you; or the name of the trustee: Currently open? [] Yes [] No Date Direct Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): [] Exact [] Explana If not exact, provide explanation:		
paid by you; or the name of the trustee: Currently open? [] Yes [] No Date Direct Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): [] Exact [] Explana If not exact, provide explanation:		
paid by you; or the name of the trustee: Currently open? [] Yes [] No Date Direct Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): [] Exact [] Explana If not exact, provide explanation:		
Date Direct Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): [] Exact [] Explana If not exact, provide explanation: Provide details of any status/disposition. Include details of creditors, terms, conditions, amounts due and settlem		If a SIPA trustee was appointed or a direct payment procedure was begun, enter the amount paid or agreed to be paid by you; or the name of the trustee:
Date Direct Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): [] Exact [] Explana If not exact, provide explanation: Provide details of any status/disposition. Include details of creditors, terms, conditions, amounts due and settlem		
If not exact, provide explanation:		
Provide details of any status/disposition. Include details of creditors, terms, conditions, amounts due and settlen		
schedule (if applicable). (The information must fit within the space provided.)		
		schedule (if applicable). (The information must fit within the space provided.)
	1	