Form BD

OMB APPROVAL

OMB Number: 3235-0012 Expires: August 31, 2016 Estimated average burden hours per response......2.75 per amendment 0.33

Uniform Application for Broker-Dealer Registration

FORM BD INSTRUCTIONS

A. GENERAL INSTRUCTIONS

- 1. Form BD is the Uniform Application for Broker-Dealer Registration. Broker-Dealers must file this form to register with the Securities and Exchange Commission, the self-regulatory organizations, and jurisdictions through the Central Registration Depository ("CRD") system, operated by FINRA.
- 2. **UPDATING** By law, the applicant must promptly update Form BD information by submitting amendments whenever the information on file becomes inaccurate or incomplete for any reason.
- 3. **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. GOVERNMENT SECURITIES ACTIVITIES

- A. Broker-dealers registered or *applicants* applying for registration under Section 15(b) of the Exchange Act that conduct (or intend to conduct) a government securities business in addition to other broker-dealer activities (if any) must file a notice on Form BD by answering "yes" to Item 2B.
- B. Section 15C of the Securities Exchange Act of 1934 requires sole government securities broker-dealers to register with the SEC. To do so, answer "yes" to Item 2C if conducting only a government securities business.
- C. Broker-dealers registered under Section 15(b) of the Exchange Act that cease to conduct a government securities business must file notice when ceasing their activities in government securities. To do so, file an amendment to Form BD and answer "yes" to Item 2D.

NOTE: Broker-dealers registered under Section 15C may register under Section 15(b) by filing an amendment to Form BD and answering "yes" to Items 2A and 2D. By doing so, broker-dealer expressly consents to withdrawal of broker-dealer's registration under 15C of the Exchange Act.

5. **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. Section 15, 15B, 15C, 17(a) and 23(a) of the Exchange Act authorize the Commission to collect the Information on this Form from registrants. See 15 U.S.C. 78o, 78o-4, 78o-5, 78-q and 78w. Filing of this Form is mandatory; however the social security number information, which aids in identifying the *applicant*, is voluntary. The principal purpose of this Form is to permit the Commission to determine whether the *applicant* meets the statutory requirement to engage in the securities business. The Form also is used by *applicants* to register as broker-dealers with certain *self-regulatory organizations* and all of the states. The Commission and the Financial Industry Regulatory Authority, Inc. maintain the files of the information on this Form and will make the information publicly available. Any member of the public may direct to the Commission any comments concerning the accuracy of the burden estimate on application facing page of 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. PAPER FILING INSTRUCTIONS (FIRST TIME APPLICANTS FILING WITH CRD AND WITH SOME JURISDICTIONS)

1. FORMAT

- A. A full paper Form BD is required when the applicant is filing with the CRD for the first time. In addition, some jurisdictions may require a separate paper filing of Form BD. The applicant should contact the appropriate jurisdiction(s) for specific filing requirements.
- B. Attach an Execution Page (Page 1) with original manual signatures to the initial Form BD filing.
- C. Type all information.
- D. Give the name of the broker-dealer and date on each page.
- E. Use only the current version of Form BD and its Schedules or a reproduction of them.
- 2. **DISCLOSURE REPORTING PAGE (DRP)** Information concerning the *applicant or control affiliate* that relates to the occurrence of an event reportable under Item 11 must be provided on the *applicant's* appropriate DRP(BD). If a *control affiliate* is an individual or organization registered through the CRD, such *control affiliate* need only complete Part I of the *applicant's* appropriate DRP(BD). Details of the event must be submitted on the *control affiliate's* appropriate DRP(BD) or DRP(U-4). Attach a copy of the fully completed DRP(BD), or DRP(U-4) previously submitted. If a *control affiliate* is an individual or organization not registered through the CRD, provide complete answers to all of the items on the *applicant's* appropriate DRP(BD).
- 3. **SCHEDULES A, B AND C** File Schedules A and B only with initial applications for registration. Use Schedule C to update Schedules A and B. Individuals not required to file a Form U-4 (individual registration) with the CRD system who are listed on Schedules A, B, or C must attach page 2 of Form U-4. The *applicant* broker-dealer must be listed in Form U-4 Item 20 or 21. Signatures are not required.
- 4. **SCHEDULE D** Schedule D provides additional space for explaining answers to Item 1C(2), and "yes" answers to items 5, 7, 8, 9,10,12, and 13 of Form BD.

C. ELECTRONIC FILING INSTRUCTIONS (APPLICANTS/ REGISTERED BROKER-DEALERS FILING AMENDMENTS WITH CRD)

1. FORMAT

A. Items 1-13 must be answered and all fields requiring a response must be completed before the filing will be accepted.

- B. Applicant must complete the execution screen certifying that Form BD and amendments thereto have been executed properly and that the information contained therein is accurate and complete.
- C. To amend information, applicant must update the appropriate Form BD screens.
- D. A paper copy, with original manual signatures, of the initial Form BD filing and amendments to Disclosure Reporting Pages (DRPs BD) must be retained by the *applicant* and be made available for inspection upon a regulatory request.
- 2. **DISCLOSURE REPORTING PAGE (DRP)** Information concerning the *applicant* or *control affiliate* that relates to the occurrence of an event reportable under Item 11 must be provided on the *applicant's* appropriate DRP(BD). If a *control affiliate* is an individual or organization registered through the CRD, such *control affiliate* need only complete the *control affiliate* name and CRD number of the *applicant's* appropriate DRP(BD). Details for the event must be submitted on the *control affiliate's* appropriate DRP(BD) or DRP(U-4). If a *control affiliate* is an individual or organization <u>not</u> registered through the CRD, provide complete answers to all of the questions and complete all fields requiring a response on the *applicant's* appropriate DRP(BD) screen.
- 3. **DIRECT AND INDIRECT OWNERS** Amend the Direct Owners and Executive Officers screen and the Indirect Owners screen when changes in ownership occur. *Control affiliates* that are individuals who are not required to file a Form U-4 (individual registration) with the CRD must complete page 2 of Form U-4 (i.e., submit/file the information elicited by the Personal Data, Residential History, and Employment and Personal History sections of that Form). The *applicant* broker-dealer must be listed in Form U-4 Item 20 or 21.

The CRD mailing address for questions and correspondence is:

NASAA/FINRA CENTRAL REGISTRATION DEPOSITORY P.O. BOX 9495 GAITHERSBURG, MD 20898-9495

EXPLANATION OF TERMS

(The following terms are italicized throughout this form.)

1. **GENERAL**

APPLICANT – The broker-dealer 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. (This definition is used solely for the purpose of Form BD.)

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

PERSON – An individual, partnership, corporation, trust, or other organization.

SELF-REGULATORY ORGANIZATION – Any national securities or commodities exchange or registered securities association, or registered clearing agency.

2. FOR THE PURPOSE OF ITEM 5 AND SCHEDULE D

SUCCESSOR - An unregistered entity that assumes or acquires substantially all of the assets and liabilities, and that continues the business of, a registered predecessor broker-dealer, who ceases its broker-dealer activities. [See Securities Exchange Act Release No. 31661 (December 28, 1992), 58 FR 7 (January 4, 1993)]

FOR THE PURPOSE OF ITEM 11 AND THE CORRESPONDING DISCLOSURE REPORTING PAGES (DRPs)

CONTROL AFFILIATE – A *person* named in Items 1A, 9 or in Schedules A, B or C as a *control* person or any other individual or organization that directly or indirectly controls, is under common control with, or is controlled by, the *applicant*, including any current employee except one performing only clerical, administrative, support or similar functions, or who, regardless of title, performs no executive duties or has no senior policy making authority.

INVESTMENT OR INVESTMENT-RELATED – Pertaining to securities, commodities, banking, 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, or savings association).

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

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 *investment* or *investment-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.

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 formal charge).

CHARGED - Being accused of a crime in a formal complaint, information, or indictment (or equivalent formal charge).

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*.

FELONY – For *jurisdictions* that do not differentiate between a *felony* and a *misdemeanor*, a *felony* is an offense punishable by a sentence of at least one year imprisonment and/or a fine of at least \$1,000. The term also includes a general court martial.

MISDEMEANOR – For *jurisdictions* that do not differentiate between a *felony* and a *misdemeanor*, a *misdemeanor* is an offense punishable by a sentence of less than one year imprisonment and/or a fine of less than \$1,000. The term also includes a special court martial.

FOUND – Includes adverse final actions, including consent decrees in which the respondent has neither admitted nor denied the findings, but does not include agreements, deficiency letters, examination reports, memoranda of understanding, letters of caution, admonishments, and similar informal resolutions of matters.

MINOR RULE VIOLATION – A violation of a *self-regulatory organization* rule that has been designated as "minor" pursuant to a plan approved by the U.S. Securities and Exchange Commission. A rule violation may be designated as "minor" under a plan if the sanction imposed consists of a fine of \$2,500 or less, and if the sanctioned person does not contest the fine. (Check with the appropriate *self-regulatory organization* to determine if a particular rule violation has been designated as "minor" for these purposes).

ENJOINED – Includes being subject to a mandatory injunction, prohibitory injunction, preliminary injunction, or a temporary restraining order.

UNIFORM APPLICATION FOR BROKER-DEALER REGISTRATION FORM BD **OFFICIAL USE** (Execution Page) SEC File No: 8-_____ Firm CRD No.: _____ **WARNING:** 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 a broker-dealer would violate the Federal securities laws and the laws of the jurisdictions and may result in disciplinary, administrative, injunctive or criminal action. INTENTIONAL MISSTATEMENTS OR OMISSIONS OF FACTS MAY CONSTITUTE CRIMINAL VIOLATIONS. **APPLICATION** AMENDMENT Exact name, principal business address, mailing address, if different, and telephone number of applicant: A. Full name of applicant (if sole proprietor, state last, first and middle name): IRS Empl. Ident. No.: (1) Name under which broker-dealer business primarily is conducted, if different from Item 1A. (2) List on Schedule D, Page1, Section I any other name by which the firm conducts business and where it is used. D. If this filing makes a name change on behalf of the applicant, enter the new name and specify whether the name change is of the applicant name (1A) or business name (1C): Please check above. E. Firm main address: (Do not use a P.O. Box) (Number and Street) (State/Country) (Zip+4/Postal Code) Branch offices or other business locations must be reported on Schedule E. Mailing address, if different: G. Business Telephone Number: (Area Code) (Telephone Number) H. Contact Employee: (Name and Title) (Area Code) (Telephone Number) **EXECUTION:** For the purposes of complying with the laws of the State(s) designated in Item 2 relating to either the offer or sale of securities or commodities, the undersigned and applicant hereby certify that the applicant is in compliance with applicable state surety bonding requirements and irrevocably appoint the administrator of each of those State(s) or such other person designated by law, and the successors in such office, attorney for the applicant in said State(s), upon whom may be served any notice, process, or pleading in any action or proceeding against the applicant arising out of or in connection with the offer or sale of securities or commodities, or out of the violation or alleged violation of the laws of those State(s), and the applicant hereby consents that any such action or proceeding against the applicant may be commenced in any court of competent jurisdiction and proper venue within said State(s) by service of process upon said appointee with the same effect as if applicant were a resident in said State(s) and had lawfully been served with process in said State(s). The applicant consents that service of any civil action brought by or notice of any proceeding before the Securities and Exchange Commission or any self-regulatory organization in connection with the applicant's broker-dealer activities, or of any application for a protective decree filed by the Securities Investor Protection Corporation, 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 IF. The undersigned, being first duly sworn, deposes and says 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 exhibits attached hereto, and other information filed herewith, all of which are made a part hereof, 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 Print Name and Title Signature Subscribed and sworn before me this _____ day of _____ Notary Public

This page must always be completed in full with original, manual signature and notarization.

To amend, circle items being amended. Affix notary stamp or seal where applicable.

My Commision expires _____ County of _____

State of _

F	ORM BD	Applicant Name:	OFFICIAL USE OFFICIAL USE							
	PAGE 2	Date: Firm CRD No.:								
2.		cking the appropriate box(es) each governmental authority, organization, or <i>jurisdiction</i> in vigistering as a broker-dealer.	which the applicant is							
>	If applicant is registered or registering with the SEC, check here and answer Items 2A through 2D below.									
SSIG			YES NO							
COMMISSION	A. Is applicant Securities I	registered or registering as a broker-dealer under Section 15(b) or Section 15B of the Exchange Act of 1934?								
B. Is applicant registered or registering as a broker-dealer under Section 15(b) of the Securities Exchange Act of 1934 and also acting or intending to act as a government securities broker or dealer?										
р ЕХСН	C. Is applicant registered or registering solely as a government securities broker or dealer under Section 15C of the Securities Exchange Act of 1934?									
SAND		wer "yes" to Item 2C if applicant answered "yes" to Item 2A or Item 2B.								
SECURITIES	D. Is applicant	ceasing its activities as a government securities broker or dealer?								
CUR	If applicant ansv	vers "yes" to Items 2A and 2D, applicant expressly consents to the withdrawal of its registration								
SE	as a government	securities broker or dealer under Section 15C of the Securities Exchange Act of 1934. See "Instruct	tions."							
RO	AMEY DO	COOF CHY NOY FINDS NOY NIVER BUTY AREA ISE OTHER	ionocify)							
S	AMEX BS	E CBOE CHX NSX FINRA NQX NYSE PHLX ARCA ISE OTHER (specily)							
	Alabama Alaska	Hawaii Michigan North Carolina Idaho Minnesota North Dakota	Texas Utah							
NC	Arizona	Illinois Mississippi Ohio	Vermont							
JURISDICTION	Arkansas	Indiana Missouri Oklahoma	Virgin Islands							
SDI	California Colorado		Virginia Washington							
1R18	Connection	cut Kentucky Nevada Puerto Rico	West Virginia							
7	Delaware	Louisiana New Hampshire Rhode Island	Wisconsin							
	District of Florida	Columbia	Wyoming							
	Georgia	Massachusetts New York Tennessee								
	0 1									
3.		gal status of applicant.								
	Corpo									
		licant's fiscal year ends:								
	C. If other than where partr	a a sole proprietor, indicate date and place <i>applicant</i> obtained its legal status (i.e., state or countr nership agreement was filed, or where <i>applicant</i> entity was formed):	y where incorporated,							
	State/Coun	try of formation: Date of formation:(MM/DD	2000							
	Schedule A must be pro	and, if applicable, Schedule B must be completed as part of all initial applications. Amendmer ovided on Schedule C.								
4.	If applicant is a	sole proprietor, state full residence address and Social Security Number.								
	Social Security	Number:								
	(Nu	imber and Street) (City) (State/Country)	(Zip+4/Postal Code)							
5.		ne time of this filing succeeding to the business of a currently registered broker-dealer?	YES NO							
		evious successions already reported on Form BD								
6.		hold or maintain any funds or securities or provide clearing services for any other broker or de	ealer?							
7.		refer or introduce customers to any other broker or dealer?								
	If "Yes," complete appropriate items on Schedule D, Page 1, Section IV.									

F	OR	M BD	ApplicantName:	OFFICI	AL US	SE	USE
	РΑ	GE 3	Date: Firm CRD No.:				
							1
8.			ant have any arrangement with any other person, firm, or organization under which:		YES	NO	
	A.	•	ks or records of <i>applicant</i> are kept or maintained by such other <i>person</i> , firm or organization?				
	B.		s, funds, or securities of the <i>applicant</i> are held or maintained by such other <i>person</i> , firm, or organ			Ш	
	C.		s, funds, or securities of customers of the <i>applicant</i> are held or maintained by such other <i>person</i> tion?	, firm or 			
	For purposes of 8B and 8C, do not include a bank or satisfactory control location as defined in paragraph (c) of Rule 15c3-3 under the Securities Exchange Act of 1934 (17 CFR 240.15c3-3).						
	if "Yes" to any part of Item 8, complete appropriate items on Schedule D, Page 1, Section IV.						
9.	Doe	es any <i>pe</i>	rson not named in Item 1 or Schedules A, B, or C, directly or indirectly:				
	A.	control t	he management or policies of the applicant through agreement or otherwise?				
	B.	wholly o	r partially finance the business of applicant?				
	mad and of 1	de pursua 1 others; c 1934 (17 C	er "Yes" to 9B if the person finances the business of the applicant through: 1) a public offering of nt to the Securities Act of 1933; 2) credit extended in the ordinary course of business by suppliers or 3) a satisfactory subordination agreement, as defined in Rule 15c3-1 under the Securities Excha FR 240.15c3-1).	s, banks,			
	If "Y	es" to an	y part of Item 9, complete appropriate items on Schedule D, Page 1, Section IV.				
10.	A.	any part	or indirectly, does <i>applicant control</i> , is <i>applicant controlled</i> by, or is <i>applicant</i> under common <i>col</i> nership, corporation, or other organization that is engaged in the securities or investment adviso s?	ry			
		If "Yes" t	o Item 10A, complete appropriate items on Schedule D, Page 2, Section V.				
	B.		or indirectly, is <i>applicant controlled</i> by any bank holding company, national bank, state member tral Reserve System, state non-member bank, savings bank or association, credit union, or foreign				
		If "Yes" to	o Item 10B, complete appropriate items on Schedule D, Page 3, Section VI.				
11.			opriate DRP for providing details to "yes" answers to the questions in Item 11. Refer to the Explan of Form BD Instructions for explanations of italicized terms.	nation of			
	A.	In the pa	st ten years has the applicant or a control affiliate:				
URE		(1) bee to a	n convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign or military on the following felony?	court			
20 Z		(2) bee	n charged with any felony?				
0180	В.	In the pa	ast ten years has the applicant or a control affiliate:				
CKIMINAL DISCLOSO		a mi or o	n convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign or military of isdemeanor involving: investments or an investment-related business, or any fraud, false statement missions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a corommit any of these offenses?	nts spiracy			
		(2) bee	n charged with a misdemeanor specified in 11B(1)?				
품	C.	Has the	U.S. Securities and Exchange Commission or the Commodity Futures Trading Commission ever	:			
L081		(1) four	nd the applicant or a control affiliate to have made a false statement or omission?				
SC		(2) four	nd the applicant or a control affiliate to have been involved in a violation of its regulations or statu	tes?			
NOI D			nd the applicant or a control affiliate to have been a cause of an investment-related business having the applicant or a control affiliate to have been a cause of an investment-related business having the applicant or a control affiliate to have been a cause of an investment-related business having the applicant or a control affiliate to have been a cause of an investment-related business having the applicant or a control affiliate to have been a cause of an investment-related business having the applicant or a control affiliate to have been a cause of an investment-related business having the applicant or a control affiliate to have been a cause of an investment-related business having the applicant of the app				
RY A	(4) entered an order against the applicant or a control affiliate in connection with investment-related activity?						
KEGULAIOKY ACIION DISCLUSUKE		(5) imp	osed a civil money penalty on the applicant or a control affiliate, or ordered the applicant or a control affiliate, or ordered the applicant or a control affiliate.	ntrol			
¥							\bot

FOR	M	BD	ApplicantName:	OFFICI	AL U	SE
PA	GE	4	Date: Firm CRD No.:			
D.	Has	s any ot	her federal regulatory agency, any state regulatory agency, or foreign financial regulatory auth	ority:	YES	NO
	(1)	ever fo unfair,	ound the applicant or a control affiliate to have made a false statement or omission or been distortion or unethical?	honest,		
	(2)	ever for	ound the applicant or a control affiliate to have been involved in a violation of investment-related tions or statutes?	<i>1</i>		
	(3)		ound the applicant or a control affiliate to have been a cause of an investment-related business horization to do business denied, suspended, revoked, or restricted?			
	(4)	in the investr	past ten years, entered an <i>order</i> against the <i>applicant</i> or a <i>control affiliate</i> in connection with a ment-related activity?	n		
	(5)	ever d	enied, suspended, or revoked the applicant's or a control affiliate's registration or license or of ler, prevented it from associating with an investment-related business or restricted its activities	:herwise, ;?		
E.		•	elf-regulatory organization or commodities exchange ever:			
	(1) (2)		the <i>applicant</i> or a <i>control affiliat</i> e to have made a false statement or omission? the <i>applicant</i> or a <i>control affiliat</i> e to have been <i>involved</i> in a violation of its rules (other than a v			Ш
	(-)	design	nated as a "minor rule violation" under a plan approved by the U.S. Securities and Exchange ission)?			
	(3)	found author	the applicant or a control affiliate to have been the cause of an investment-related business ha ization to do business denied, suspended, revoked, or restricted?	ving its		
	(4)	discipl susper	ined the applicant or a control affiliate by expelling or suspending it from membership, barring nding its association with other members, or otherwise restricting its activities?	j or		
F.	Has bee	s the <i>ap</i> en revok	plicant's or a control affiliate's authorization to act as an attorney, accountant, or federal controled or suspended?	actor ever		
G.	ls th	ne <i>appli</i> wer to a	cant or a control affiliate now the subject of any regulatory proceeding that could result in a "y any part of 11C, D, or E?	es"		
H.	(1)	Has ar	ny domestic or foreign court:			
			the past ten years, enjoined the applicant or a control affiliate in connection with any investme stivity?			
			ver found that the applicant or a control affiliate was involved in a violation of investment-related regulations?			
		(c) ev	rer dismissed, pursuant to a settlement agreement, an investment-related civil action brought a e applicant or control affiliate by a state or foreign financial regulatory authority?	against		
	(2)		applicant or a control affiliate now the subject of any civil proceeding that could result in a "yes part of 11H(1)?			
l.	In t	he past iate of a	ten years has the <i>applicant</i> or a <i>control affiliate</i> of the <i>applicant</i> ever been a securities firm or a securities firm that:	a control		
	(1)	has be	een the subject of a bankruptcy petition?			
	(2)		d a trustee appointed or a direct payment procedure initiated under the Securities Investor Pr			
J.	Has		ding company ever denied, paid out on, or revoked a bond for the applicant?			
K.	Doe	es the a	pplicant have any unsatisfied judgments or liens against it?			

FORM BD	Applicant Name:	OFFICIAL USE	OFFICIAL USE ONLY
PAGE 5	Date: Firm CRD No.:		
category that ac	business engaged in (or to be engaged in, if not yet active) by applicant. Do not check any accounts for (or is expected to account for) less than 1% of annual revenue from the securities dvisory business.		
B. Exchange rC. Broker or dD. Broker or d	nember engaged in exchange commission business other than floor activities	□EMF □IDM □BDR	= R
F. UnderwriterG. Mutual fundH. Mutual fund	r or selling group participant (corporate securities other than mutual funds) d underwriter or sponsord retailer	□USG □MFU □MFR	à J
2. U.S. go J. Municipal s K. Municipal s L. Broker or d	overnment securities dealer	□GSB □MSE □MSE □VLA	3 3
N. Real estateO. Broker or d	syndicatorealer selling oil and gas interests	□RES	3
R. Broker or dS. InvestmentT. 1. Broker	ealer selling securities of only one issuer or associate issuers (other than mutual funds)	□NPB □IAD □TAP	
U. Non-excharV. Trading secW. Private place	or dealer selling tax shelters or limited partnerships in the secondary market	□NEX □TRA □PLA	
 bank, s insurar 	ealer involved in a networking, kiosk or similar arrangement with a: savings bank or association, or credit union nce company or agency details on Schedule D, Page 1, Section II)	□INA	
others B. Does a	applicant effect transactions in commodity futures, commodities or commodity options as a broom as a dealer for its own account?		

Sc	hedule A of FORM BD									OFFICIAL	USE
	DIRECT OWNERS AND	Applica	nt Name:					_			
	(Answer for Form BD Item 3)	Date:		Fir	m CRD i	No.:					
	(Allswel for Form DD Refit 3)										
1.	Use Schedule A only in new applicatio B in new applications to provide infor										
2.	List below the names of:										
	 (a) each Chief Executive Officer, Chie and individuals with similar statu (b) in the case of an applicant that is applicant, unless the applicant is Act of 1934); Direct owners include any person or more of a class of a voting secowned by his/her child, stepchild law, daughter-in-law, brother-in-law, daughter-in-law, brother-in-law, contributed in the case of an applicant that is a upon dissolution, or have contributed, in the case of a trust that directly dissolution, or has contributed, 5 (e) in the case of an applicant that 	s or functi a corporat a public re that owns curity of the , grandchi aw, or sist any option partnersh buted, 5% owns 5% of 5% or more is a Limit	ons; tion, each shareho porting company s, beneficially owns e applicant. For pu ld, parent, steppar er-in-law, sharing n, warrant or right ip, all general parts or more of the par more of a class of e of the applicant's ed Liability Comp	Ider t (a cor s, has irpos ent, g the sa to pu ners a tners f a vo s cap anv (hat dire mpany s the rigles of the randpa ame res rchase nd thos hip's ca ting sec ital, the "LLC").	ctly owns 5 subject to S subject to S ht to vote, or is Schedule rent, spous sidence; or the security elimited an apital; and curity of the trust and e (i) those r	% or mo ections r has the e, a pers e, siblin (ii) that y. d special applica, ach trus nembers	pre con la contra con la contra con la contra contr	of a class or 15(d) of ower to se oeneficial nother-in- she has th artners that or that has at have th	of a voting secur the Securities E Il or direct the sa ly owns any sec law, father-in-law he right to acquir at have the right to the right to rece	rity of the exchange alle of, 5% urities (i) v, son-in-re, within o receive alive upon
3.	dissolution, or have contributed, 5% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.										
4.											
	country, or enter "I" if the owner is an individual.										
5.	Complete the "Title or Status" column and for shareholders, the class of sec						rtner, tr	uste	e, sole pr	oprietor, or shar	reholder;
6.	Ownership codes are: NA - less t A - 5% bu		B - 10% n 10% C - 25%				D - 509 E - 759		ut less that more	an 75%	
7.	(a) In the "Control Person" column, of person does not have control. No trustees would be "control person"	lote that u									
	(b) In the "PR" column, enter "PR" if to of 1934.	the owner	is a public reportin	g cor	npany ι	under Secti	ons 12 c	r 15	(d) of the	Securities Exch	ange Act
	FULL LEGAL NAME	DE/FE/I	Title or Status		Title or Acquired	Ownership	Contro			No. If None: lo., IRS Tax No.	Official Use
(Indi	viduals: Last Name, First Name, Middle Name)	DE/I E/I	Title of Status			Code	1 6130			Employer ID.	Only
				MM	YYYY			PR			

Canaly C													
1. Use Schedule B only in new applications to provide information on the indirect owners of the applicant. Use Schedule A in new applications to provide information on direct owners. File all amendments on Schedule C. Complete each column. 2. With respect to each owner listed on Schedule A, (except individual owners), list below: (a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation; For purposes of this Schedule, a person beneficially owns any securities (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant or right to purchase the security. (b) in the case of an owner that is a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital; and (c) in the case of an owner that is a Limited Liability Company (*LCC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers. 3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Securities Exchange Act of 1934) is reached, no ownership information further up the chain of ownership need be given. 4. In the "DE/FE/I" column, enter "DE" if the owner is a domestic entity, or enter "FE" if owner is an entity incorporated or domiciled in a foreign country, or enter "i" if the owner is an individual. 5. Complete the "Status" column, enter "Yes" if person has "control"	Sc		I BD	Applicant Name:							OFFICIAL U	SE	
applications to provide information on direct owners. File all amendments on Schedule C. Complete each column . 2. With respect to each owner listed on Schedule A, (except individual owners), list below: (a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation; For purposes of this Schedule, a <i>person</i> beneficially owns any securities (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, bring the same residence; or (ii) that he/she has the <i>right to acquire</i> , within 60 days, through the exercise of any option, warrant or right to purchase the security. (b) in the case of an owner that is a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital; and (c) in the case of an owner that is a Limited Liability Company ("LCC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers. 3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Securities Exchange Act of 1934) is reached, no ownership information further up the chain of ownership need be given. 4. In the "DE/FE/I" column, enter "DE" if the owner is a domestic entity, or enter "FE" if owner is an entity incorporated or domiciled in a foreign country, or enter "I" if the owner is an individual. 5. Complete the "Status" column by entering status as partner, trustee, shareholder, etc., and if shareholder, class of securities owned (if more than one is issued). 6. Ownership codes are: C - 25% but less than 50% D - 50%		(Answer for Form BD Item 3))							_			
(a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation; For purposes of this Schedule, a person beneficially owns any securities (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant or right to purchase the security. (b) in the case of an owner that is a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital; and (c) in the case of an owner that is a trust, the trust and each trustee. (d) in the case of an owner that is a Limited Liability Company ("LCC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers. 3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Securities Exchange Act of 1934) is reached, no ownership information further up the chain of ownership need be given. 4. In the "DE/FE/I" column, enter "DE" if the owner is a domestic entity, or enter "FE" if owner is an entity incorporated or domiciled in a foreign country, or enter "I" if the owner is an individual. 5. Complete the "Status" column by entering status as partner, trustee, shareholder, etc., and if shareholder, class of securities owned (if more than one is issued). 6. Ownership codes are: C - 25% but less than 50% D - 50% but less than 75% E - 75% or more F - Other General Partners 7. (a) In the "Control Person" column, enter "Yes" if pers	1.												in new
to sell or direct the sale of, 25% or more of a class of a voting security of that corporation; For purposes of this Schedule, a <i>person</i> beneficially owns any securities (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, fair-in-law, so-in-law, daughter-in-law, by other-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the <i>right to acquire</i> , within 60 days, through the exercise of any option, warrant or right to purchase the security. (b) in the case of an owner that is a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital; and (c) in the case of an owner that is a trust, the trust and each trustee. (d) in the case of an owner that is a Limited Liability Company ("LCC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers. 3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Securities Exchange Act of 1934) is reached, no ownership information further up the chain of ownership need be given. 4. In the "DE/FE/i" column, enter "DE" if the owner is a domestic entity, or enter "FE" if owner is an entity incorporated or domiciled in a foreign country, or enter "I" if the owner is an individual. 5. Complete the "Status" column by entering status as partner, trustee, shareholder, etc., and if shareholder, class of securities owned (if more than one is issued). 6. Ownership codes are: C - 25% but less than 50% D - 50% but less than 75% E - 75% or more F - Other General Partners 7. (a) In the "Control Person" column, enter "Yes" if person has "control" as defined in the instructions to this form, and enter "No" if the person does not have control. Note tha	2.	With respect to each owner	listed on	Schedule A, (ex	cept individ	ual ov	wners),	list below:					
For purposes of this Schedule, a <i>person</i> beneficially owns any securities (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the <i>right to acquire</i> , within 60 days, through the exercise of any option, warrant or right to purchase the security. (b) in the case of an owner that is a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital; and (c) in the case of an owner that is a trust, the trust and each trustee. (d) in the case of an owner that is a Limited Liability Company ("LCC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers. 3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Securities Exchange Act of 1934) is reached, no ownership information further up the chain of ownership need be given. 4. In the "DE/FE/I" column, enter "DE" if the owner is a domestic entity, or enter "FE" if owner is an entity incorporated or domiciled in a foreign country, or enter "I" if the owner is an individual. 5. Complete the "Status" column by entering status as partner, trustee, shareholder, etc., and if shareholder, class of securities owned (if more than one is issued). 6. Ownership codes are: C - 25% but less than 50% D - 50% but less than 75% E - 75% or more F - Other General Partners 7. (a) In the "Control Person" column, enter "Yes" if person has "control" as defined in the instructions to this form, and enter "No" if the person does not have control. Note that under this definition most executive officers and all 25% owners, general partners, and trust										has	the right	to vote, or has the	power
upon dissolution, or have contributed, 25% or more of the partnership's capital; and (c) in the case of an owner that is a trust, the trust and each trustee. (d) in the case of an owner that is a Limited Liability Company ("LCC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers. 3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Securities Exchange Act of 1934) is reached, no ownership information further up the chain of ownership need be given. 4. In the "DE/FE/I" column, enter "DE" if the owner is a domestic entity, or enter "FE" if owner is an entity incorporated or domiciled in a foreign country, or enter "I" if the owner is an individual. 5. Complete the "Status" column by entering status as partner, trustee, shareholder, etc., and if shareholder, class of securities owned (if more than one is issued). 6. Ownership codes are: C - 25% but less than 50% D - 50% but less than 75% E - 75% or more F - Other General Partners 7. (a) In the "Control Person" column, enter "Yes" if person has "control" as defined in the instructions to this form, and enter "No" if the person does not have control. Note that under this definition most executive officers and all 25% owners, general partners, and trustees would be "control persons". (b) In the "PR" column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934. FULL LEGAL NAME [Individuals: Last Name, First Name, Only Only Only Only Only Only Only Only		stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the <i>right to acquire</i> , within 60 days, through the exercise of any option, warrant											
(d) in the case of an owner that is a Limited Liability Company ("LCC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers. 3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Securities Exchange Act of 1934) is reached, no ownership information further up the chain of ownership need be given. 4. In the "DE/FE/I" column, enter "DE" if the owner is a domestic entity, or enter "FE" if owner is an entity incorporated or domiciled in a foreign country, or enter "I" if the owner is an individual. 5. Complete the "Status" column by entering status as partner, trustee, shareholder, etc., and if shareholder, class of securities owned (if more than one is issued). 6. Ownership codes are: C - 25% but less than 50% D - 50% but less than 75% E - 75% or more F - Other General Partners 7. (a) In the "Control Person" column, enter "Yes" if person has "control" as defined in the instructions to this form, and enter "No" if the person does not have control. Note that under this definition most executive officers and all 25% owners, general partners, and trustees would be "control persons". (b) In the "PR" column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934. FULL LEGAL NAME [Individuals: Last Name, First Name, First Name, First Name, First Name, Only or Employer ID. [Interest is Owned] [Interest i										ıl par	tners tha	t have the right to	receive
or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers. 3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Securities Exchange Act of 1934) is reached, no ownership information further up the chain of ownership need be given. 4. In the "DE/FE/I" column, enter "DE" if the owner is a domestic entity, or enter "FE" if owner is an entity incorporated or domiciled in a foreign country, or enter "I" if the owner is an individual. 5. Complete the "Status" column by entering status as partner, trustee, shareholder, etc., and if shareholder, class of securities owned (if more than one is issued). 6. Ownership codes are: C - 25% but less than 50% D - 50% but less than 75% E - 75% or more F - Other General Partners 7. (a) In the "Control Person" column, enter "Yes" if person has "control" as defined in the instructions to this form, and enter "No" if the person does not have control. Note that under this definition most executive officers and all 25% owners, general partners, and trustees would be "control persons". (b) In the "PR" column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934. FULL LEGAL NAME [Individuals: Last Name, First Name, Fi		(c) in the case of an owner	that is a	trust, the trust ar	nd each trus	tee.							
 12 or 15(d) of the Securities Exchange Act of 1934) is reached, no ownership information further up the chain of ownership need be given. In the "DE/FE/I" column, enter "DE" if the owner is a domestic entity, or enter "FE" if owner is an entity incorporated or domiciled in a foreign country, or enter "I" if the owner is an individual. Complete the "Status" column by entering status as partner, trustee, shareholder, etc., and if shareholder, class of securities owned (if more than one is issued). Ownership codes are: C - 25% but less than 50% D - 50% but less than 75% E - 75% or more F - Other General Partners (a) In the "Control Person" column, enter "Yes" if person has "control" as defined in the instructions to this form, and enter "No" if the person does not have control. Note that under this definition most executive officers and all 25% owners, general partners, and trustees would be "control persons". (b) In the "PR" column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934. 		(d) in the case of an owner to or have contributed, 259	hat is a Li % or mor	imited Liability Co re of the LLC's ca	ompany ("L0 apital, and (i	CC"), i) if m	(i) those nanage	e members d by elected	that hav	e the	e right to , all elect	receive upon disse ed managers.	olution,
 In the "DE/FE/I" column, enter "DE" if the owner is a domestic entity, or enter "FE" if owner is an entity incorporated or domiciled in a foreign country, or enter "I" if the owner is an individual. Complete the "Status" column by entering status as partner, trustee, shareholder, etc., and if shareholder, class of securities owned (if more than one is issued). Ownership codes are: C - 25% but less than 50% D - 50% but less than 75% E - 75% or more F - Other General Partners (a) In the "Control Person" column, enter "Yes" if person has "control" as defined in the instructions to this form, and enter "No" if the person does not have control. Note that under this definition most executive officers and all 25% owners, general partners, and trustees would be "control persons". (b) In the "PR" column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934. 	3.												
 6. Ownership codes are: C - 25% but less than 50% D - 50% but less than 75% E - 75% or more F - Other General Partners 7. (a) In the "Control Person" column, enter "Yes" if person has "control" as defined in the instructions to this form, and enter "No" if the person does not have control. Note that under this definition most executive officers and all 25% owners, general partners, and trustees would be "control persons". (b) In the "PR" column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934. FULL LEGAL NAME [DE/FE/I] Entity in Which Interest is Owned Status [Ownership Person S.S. No., IRS Tax No. Use Only Only Only Only Only Only Only Only	4.	4. In the "DE/FE/I" column, enter "DE" if the owner is a domestic entity, or enter "FE" if owner is an entity incorporated or domiciled in a foreign											
7. (a) In the "Control Person" column, enter "Yes" if person has "control" as defined in the instructions to this form, and enter "No" if the person does not have control. Note that under this definition most executive officers and all 25% owners, general partners, and trustees would be "control persons". (b) In the "PR" column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934. FULL LEGAL NAME DE/FE/I Entity in Which Interest is Owned Status Status Acquired Ownership Person S.S. No., IRS Tax No. Use Only	5.	· · · · · · · · · · · · · · · · · · ·											
person does not have control. Note that under this definition most executive officers and all 25% owners, general partners, and trustees would be "control persons". (b) In the "PR" column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934. Date Control CRD No. If None: Official Status Acquired Ownership Person S.S. No., IRS Tax No. Use Only	6.	Ownership codes are: C -	25% but	t less than 50%	D - 50% b	ut les	s than 7	75% E - 7	75% or r	nore	F - Ot	ther General Partn	ners
FULL LEGAL NAME DE/FE/I Entity in Which Status Acquired Ownership Person S.S. No., IRS Tax No. Use (Individuals: Last Name, First Name, Interest is Owned Status Only	7.	person does not have contrustees would be "control" (b) In the "PR" column, enter	ontrol. N ol persol	ote that under th	is definition	most	t execut	tive officers	and all	25%	owners,	, general partners	, and
Interest is Owned Status			DE/FE/I	Entity in Which				Person S.S.		S.S. N			
	(Interest is Owned	Status	MM		ode		PR	or Em	ployer ID.	Only

Schedule C of FORM BI	D									OFFICIA	L USE	
AMENDMENTS TO	1	Applica	nt Name:						_			
SCHEDULES A & B (Amendments to answers for Form BD Item)	3) [Date:			Firm	CRD	No.:					
(Amenaments to unswers for Form BB from	9											
This Schedule C is used to amend Schedule C. Complete each co								es for s	pec	ific instru	ctions for comp	oleting this
In the Type of Amendment ("Type person).	of Amendment ("Type of Amd.") column, indicate "A" (addition), "D" (deletion), or "C" (change in information about the same											
3. Ownership codes are: NA - less A - 5% b	NA - less than 5% B - 10% but less than 25% D - 50% but less than 75% F - Other General Partners A - 5% but less than 10% C - 25% but less than 50% E - 75% or more											
4. List below all changes to Scheo	dule A:	(DIRE	CT OWNERS	AND	EXE	CUTIV	E OFFICEF	RS)				
FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Type of Amd.	Title or Status		Date Ti Status A	cquired	Control Ownership Code	CRD No. Person		If None: S. S. No., IRS Tax No or Employer ID		Official Use Only
					MM `	7 Y Y Y			PR			
5. List below all changes to Scheo	dule B:	(INDIF	RECT OWNER	RS)								·
FULL LEGAL NAME	DE/FE/I	Type of	Entity in Which	Statu		Status uired	Ownership	Contr Perso			O No. If None: No., IRS Tax No.	Official Use
(Individuals: Last Name, First Name, Middle Name)	<i>DE/TE/T</i>	Amd.	Interest is Owned	Otatu		YYYY	Code	1 6/30	PR	or	Employer ID.	Only

Schedule D of FORM BD				OFFICIAL USE		
Page 1	Applicant Name	:				
	Date:	Firm CRD No.: _				
Use this Schedule D Page 1 to report de submitted details. Do not repeat previous			nformation or changes/upo	dates to previously		
This is an \Box INITIAL \Box AMENDED	detail filing for th	e Form BD items checked be	elow:			
SECTION I Other Business Name	s					
(Check if applicable) \square Item 1C(2) List each of the "other" names and the ju	risdiction(s) in wh	nich they are used.				
1. Name	Jurisdiction	Jurisdiction 2. Name Jurisdiction				
3. Name	Jurisdiction	4. Name		Jurisdiction		
SECTION II Other Business						
(Check one)	☐ Item 13B					
Applicant must complete a separate Sche	edule D Page 1 fo	or each affirmative response i	n this section.			
Briefly describe any other business (ITEM additional comments if necessary.	/I 12Z); or any oth	ner non-securities business (TEM 13B). Use reverse sid	de of this sheet for		
additional comments in necessary.						
SECTION III Successions						
(Check if applicable) Item 5						
Date of Succession MM DD YYYY	Name of Predece	essor				
Firm CRD Number	IRS Employer Ide	entification Number (if any)	SEC File Number (if any)			
Briefly describe details of the succession in	ncluding any asse	ets or liabilities not assumed b	y the successor. Use revers	se side of this sheet		
for additional comments if necessary.						
SECTION IV Introducing and Clear	ing Arrangement	ts / Control Persons / Finan	cings			
(Check one)	em 8A 🔲 It	em 8B	☐ Item 9A ☐ Iter	m 9B		
Applicant must complete a separate Scheoany item. Complete the "Effective Date" be						
reporting a change or termination of an arr			te of the change.			
Firm or Organization Name			CRD Number (if any)			
Business Address (Street, City, State/Country, Zip+4	1 Postal Code)		Effective Date	Termination Date		
			MM DD YYYY / /	MM DD YYYY		
Individual Name (if applicable) (Last, First, Middle)			CRD Number (if any)			
Business Address (if applicable) (Street, City, State/Cod	(State/Country, Zip+4 Postal Code) Effective Date MM DD YYYY MM DD YYYY					
				/ /		
Briefly describe the nature of reference or an and amount of financing (ITEM 9B). Use re				9A); or the method		
and amount of illianding (HEM 95). Use le	voi 30 3140 01 11115 5	shoet for additional Comments	ก กอบองอนาง.			

Schedule D of FORM	I BD						OFFICIAL USE
Page 2	Applicant Nam	ne:					
	Date:	Fir	m CRD No.:	:			
Use this Schedule D Page 2 to re letails. Do not repeat previously s ndividuals necessary to answer o	submitted information. S	upply details for all	partnersh	ips, corpor	ations, org	anizatio	
lse the "Effective Date" box to en the affiliation.	nter the Month, Day, and	d Year that the affil	iation was	effective o	or the date	of the m	ost recent change
his is an 🔲 INITIAL	☐ AMENDED detail	filing for Form BD	Item 10A				
10A. Directly or indirectly, do partnership, corporation	oes <i>applicant</i> control, is n, or other organization						
ECTION V Complete th	is section for contr	ol issues relati	ng to ITE	EM 10A o	nly.		
ne details supplied relate to:							
Partnership, Corporation, or Organizat	ion Name		CRD Numbe	er (if any)			
(check only one)	Non Donated on the second		h	□			
This Partnership, Corporation, or Organiza Business Address <i>(Street, City, State/Cour</i>		☐ is <i>controlled</i>	оу <i>арріісап</i> і	∟ IS U	Effective E	ate	Termination Date MM DD YYYY
	Yes, provide country of domicile incorporation:	Check "Yes" or "No" for activities of this partner corporation, or organiz	ship,	Securities Activities:	Yes No	Investme Advisory Activities:	☐ Yes ☐ No
Briefly describe the <i>control</i> relationship. Us Partnership, Corporation, or Organizat		additional comments if ne	cessary.	er (if anv)			
2				, (,),			
(check only one)							
This Partnership, Corporation, or Organiza Business Address (<i>Street, City, State/Cour</i>		is controlled	by applicant	is u	nder common Effective D		n <i>applicant</i> Termination Date
, ,					MM DD		MM DD YYYY
	Yes, provide country of domicile incorporation:	Check "Yes" or "No" for activities of this partner corporation, or organize	ship,	Securities Activities:	Yes No	Investme Advisory Activities:	☐ Yes ☐ No
Briefly describe the <i>control</i> relationship. Us	se reverse side of this sheet for a	additional comments if ne	cessary.				
Partnership, Corporation, or Organizat	ion Name		CRD Numbe	er (if any)			
(check only one)							
This Partnership, Corporation, or Organiza Business Address (Street, City, State/Cour		is controlled	by <i>applicant</i>	is u	nder common Effective D		n <i>applicant</i> Termination Date
					MM DD	YYYY	MM DD YYYY
	Yes, provide country of domicile incorporation:	Check "Yes" or "No" for activities of this partner corporation, or organize	ship,	Securities Activities:	Yes No	Investme Advisory Activities:	nt Yes No
Briefly describe the <i>control relationship</i> . Us		additional comments if ne	cessary.			Activities:	

chedule D of FORM BD				OFFICIAL USE		
Page 3	Applicant Name:					
	Date: Firm CF	RD No.:				
etails. Do not repeat previously submitte	etails for Item 10B. Report only new info ed information. Supply details for all part em completely. Use additional copies o	nerships, corp	orations, organization	ons, institutions and		
lse the "Effective Date" box to enter then the affiliation.	Month, Day, and Year that the affiliatio	n was effective	or the date of the r	nost recent change		
his is an 🔲 INITIAL 🔲 A	MENDED detail filing for Form BD Item	10B				
	nt controlled by any bank holding compender bank, savings bank or association			bank of the Federal		
Complete this section	on for control issues relating to ITE	M 10B only.				
Provide the details for each organization pplicant's chain of ownership. The details	n or institution that <i>controls</i> the <i>applic</i> alls supplied relate to:	ant, including	each organization	or institution in the		
Financial Institution Name 1	nancial Institution Name CRD Number (if applicable)					
Institution Type (i.e., bank holding company, national non-member bank, savings associal	ystem, state	Effective Date	MM DD YYYY			
nun-member bank, savings associa	Termination Date	MM DD YYYY				
Business Address (Street, City, State/Country, Zip+4	If foreign, country of	domicile or incorporation				
Financial Institution Name 2 Institution Type (i.e., bank holding company, national	ol bank, state member bank of the Federal Reserve S	CRD Number (if a	pplicable) Effective Date	MM DD YYYY		
Institution Type (i.e., bank holding company, national non-member bank, savings associal		ystem, state	Effective Date Termination Date	MM DD YYYY / / MM DD YYYY		
Business Address (Street, City, State/Country, Zip+4	/Postal Code)		If foreign, country of	/ / domicile or incorporation		
Briefly describe the <i>control</i> relationship. Use reverse	side of this sheet for additional comments if necessar	ry.				
Financial Institution Name		CRD Number (if a	pplicable)			
Institution Type (i.e., bank holding company, national	l bank, state member bank of the Federal Reserve S	ystem, state	Effective Date	MM DD YYYY		
non-member bank, savings associa	tion, credit union, or toreigh bank)		Termination Date	MM DD YYYY		
Business Address (Street, City, State/Country, Zip+4	/Postal Code)		If foreign, country of	domicile or incorporation		
Briefly describe the <i>control</i> relationship. Use reverse	side of this sheet for additional comments if necessa	ry.				
Financial Institution Name		CRD Number (if a	pplicable)			
Institution Type (i.e., bank holding company, national non-member bank, savings associations)	ystem, state	Effective Date	MM DD YYYY			
non-member balik, savings associd	aon, a cuit union, or luicigh bank)		Termination Date	MM DD YYYY		
Business Address (Street, City, State/Country, Zip+4	/Postal Code)		If foreign, country of	domicile or incorporation		
Briefly describe the <i>control</i> relationship. Use reverse	side of this sheet for additional comments if necessar	ry.				
applicant has more than 4 organization	ns/institutions to report, complete addi	tional Schedul	e D page 3s.			

Sc	nedule E of FORM BD			OFFICIAL USE					
		Applicant Name:							
		Date: Firm	CRD No.:						
		INSTRUCTION	S						
Gene			. Repeat Items 1-12 for each branch office or other bu						
		nal copies of this schedule as necessary. If this brar nust be reported under Item 1C(2) on Page 1 of thi	nch office or other business location is using a name in is Form.	connection with securities activities					
Spec Item	 Specify only one box. Check "Add" when a be 	anch office or other business location is opened and the <i>applicant</i> is filing the initial notice, "Delete" when a branch office or other business							
Item	CRD will assign this branch number when the	ate any other change to previously filed information. applicant adds a branch office or other business location as discussed in Item 1 above. If known, complete this item for all deletions and							
Item	 amendments. The Billing Code is an alpha/numeric value confield. 	nsisting of up to eight characters. It is the responsibility of the firm to establish and maintain its own unique billing codes. This is not a required							
Item	4. Complete this item for all entries. A physical	ocation must be included; post office box designat							
Item Item	6. If the branch office or other business location	nanges the address of an existing branch office or occupies or shares space on premises within a bar	other dusiness location. nk, savings bank or association, credit union, or other	financial institution, enter the name					
Item		me of the supervisor or registered representative i	n charge who is physically at this location.						
Item Item			was opened (ADD), closed (DELETE), or the effective	date of the change (AMENDMENT).					
Item Item		cation will be an Office of Supervisory Jurisdiction cation is a business location that will operate pursi	(OSJ) as defined in FINRA rules. uant to a written agreement or contract (other than an	insurance agency agreement) with					
itom	the main office and any one or more of the fo	owing will apply: the location (A) assumes liability	for its own expenses or has its expenses paid by a pa red representatives; (C) deems 5% or more of its to	rty other than the <i>applicant;</i> (B) has					
	"independent contractors" for tax purposes;	r (D) engages in separate market making and/or u	inderwriting activities.	iai registereu representatives to be					
Item	12. Check the appropriate box(es) if the branch o	other business location is registering with FINRA	or registering or reporting with a <i>jurisdiction</i> .						
1.	Check only one box: Add De								
2.	CRD Branch Number	6	nstitution Name (if applicable)						
3.	Billing Code		Supervisor Name						
4.	Street	8	CRD Number of Supervisor						
		Q	·						
	P.O. Box (if applicable), Suite, Floor	10. (Effective Date (MM/DD/YYYY) DSJ						
16	City, State/Country, Zip Code + 4/Postal Code								
<i>If ap_l</i> 5.	plicant is changing the address, enter the new add	ress in Item 5.	Yes No						
J.	Street	_	If Yes, indicate each Item 11 subset that applies:						
	P.O. Box (if applicable), Suite, Floor		A B C D						
	City, State/Country, Zip Code + 4/Postal Code	12.	FINRA Jurisdiction						
1.	Check only one box: Add De	ete Amendment							
2.	CRD Branch Number	6	nstitution Name (if applicable)						
3.	Billing Code	7	Supervisor Name						
4.		Q							
	Street	9	CRD Number of Supervisor						
	P.O. Box (if applicable), Suite, Floor	E	Effective Date (MM/DD/YYYY) DSJ Yes No						
	City, State/Country, Zip Code + 4/Postal Code		103 1110						
<i>If ap_i</i> 5.	plicant is changing the address, enter the new add	ress in Item 5. 11. [Yes No						
J.	Street	F	If Yes, indicate each Item 11 subset that applies:						
	P.O. Box (if applicable), Suite, Floor		_A						
	City, State/Country, Zip Code + 4/Postal Code	12. [FINRA Jurisdiction						

CRIMINAL DISCLOSURE REPORTING PAGE (BD)

GENERAL INSTRUC	TIONS				
This Disclosure Reporting Page (DRP BD) is an \square INITIAL OR \square AMENDE Items 11A and 11B of Form BD;	D response used to report details for affirmative responses to				
	in a domestic, foreign, or military court to any felony? a domestic, foreign or military court to a misdemeanor involving: investments emissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting,				
Use a separate DRP for each event or <i>proceeding</i> . An event or <i>proceeding</i> may be reported for mage.	ore than one <i>person</i> or entity using one DRP. File with a completed Execution				
Multiple counts of the same charge arising out of the same event(s) should be reported on the of the same event, must be reported on separate DRPs. Use this DRP to report all charges arising answer to the above items.					
If a control affiliate is an individual or organization registered through the CRD, such control affiliate need only complete Part I of the applicant's appropriate DRP (BD). Details of the event must be submitted on the control affiliate's appropriate DRP (BD) or DRP (U-4). If a control affiliate is an individual or organization not registered through the CRD, provide complete answers to all the items on the applicant's appropriate DRP (BD). The completion of this DRP does not relieve the control affiliate of its obligation to update its CRD records.					
Applicable court documents (i.e., criminal complaint, information or indictment as well as judgr not previously submitted. Documents will not be accepted as disclosure in lieu of answering the					
PART I					
A. The person(s) or entity(ies) for whom this DRP is being filed is (are): The Applicant Applicant and one or more control affiliate(s) One or more control affiliate(s) If this DRP is being filed for a control affiliate, give the full name of the control affiliate If the control affiliate is registered with the CRD, provide the CRD number. If not, India					
NAME OF APPLICANT	APPLICANT CRD NUMBER				
BD DRP - CONTROL AFFILIATE	·				
CRD NUMBER	This <i>Control Affiliate</i> is ☐ Firm ☐ Individual				
Registered:					
NAME (For individuals, Last, First, Middle)					
☐ This DRP should be removed from the BD record because the <i>control affi</i>	iliate(s) are no longer associated with the BD.				
B. If the control affiliate is registered through the CRD, has the control affiliate subm System for the event? If the answer is "Yes," no other information on this DRP n					
☐ Yes ☐ No					

NOTE: The completion of this Form does <u>not</u> relieve the *control affiliate* of its obligation to update its CRD records.

CRIMINAL DISCLOSURE REPORTING PAGE (BD) (continuation)

PART II			

	whether or not the organization was an <i>investment-related</i> business and the <i>applicant's</i> or <i>control affiliate's</i> position, title or relationship.
	Formal Charge(s) were brought in: (include name of Federal, Military, State or Foreign Court, Location of Court - City or County <u>and</u> State or Country, Docket/Case number).
E	Event Disclosure Detail (Use this for both organizational and individual charges.)
P	A. Date First Charged (MM/DD/YYYY):
	If not exact, provide explanation:
Ē	3. Event Disclosure Detail (include Charge(s)/Charge Description(s), and for each charge provide: <u>1.</u> number of counts, <u>2.</u> felony of misdemeanor, <u>3.</u> plea for each charge, and <u>4.</u> product type if charge is investment-related):
C	C. Did any of the Charge(s) within the Event involve a Felony?
	D. Current status of the Event? Pending On Appeal Final
E	E. Event Status Date (complete unless status is Pending) (MM/DD/YYYY):
	If not exact, provide explanation:
	Disposition Disclosure Detail: Include for each charge, A. Disposition Type [e.g., convicted, acquitted, dismissed, pretrial, etc.], B. Dat C. Sentence/Penalty, D. Duration [if sentence-suspension, probation, etc.], E. Start Date of Penalty, F. Penalty/Fine Amount and G. Date Pai
	Provide a brief summary of circumstances leading to the charge(s) as well as the disposition. Include the relevant dates when the conductivities which was the subject of the charge(s) occurred. (The information must fit within the space provided.)
	Provide a brief summary of circumstances leading to the charge(s) as well as the disposition. Include the relevant dates when the condu which was the subject of the charge(s) occurred. (The information must fit within the space provided.)

REGULATORY ACTION DISCLOSURE REPORTING PAGE (BD)

GE	ENERAL INSTRUCTIONS	
,	INITIAL OR AMENDED response used to report details for	r affirmative
responses to <i>Items 11C, 11D, 11E, 11F or 11G</i> of Form B	3D;	
Check ☑ item(s) being responded to: 11C. Has the U.S. Securities and Exchange Commission or the Commodity Futures Trading Commiss	ssion ever:	
(1) found the applicant or a control affiliate to have made a false statement or omiss (2) found the applicant or a control affiliate to have been involved in a violation of its	ssion?	
(3) found the applicant or a control affiliate to have been a cause of an investment-r	t-related business having its authorization to do business denied, suspended, revoked, or restricted?	
 (4) entered an order against the applicant or a control affiliate in connection with inv (5) imposed a civil money penalty on the applicant or a control affiliate, or ordered the 	the applicant or a control affiliate to cease and desist from any activity?	
 Has any other federal regulatory agency, any state regulatory agency, or foreign financial regulatory (1) ever found the applicant or a control affiliate to have made a false statement or control affiliate. 		
 (2) ever found the applicant or a control affiliate to have been involved in a violation (3) ever found the applicant or a control affiliate to have been a cause of an investm. 	n of <i>investment-related</i> regulations or statutes? Iment-related business having its authorization to do business denied, suspended, revoked, or restricted?	
(4) in the past ten years, entered an <i>order</i> against the <i>applicant</i> or a <i>control affiliate</i>		activitios?
11E. Has any self-regulatory organization or commodities exchange ever:		ictivities:
	ssion? Is rules (other than a violation designated as a <i>"minor rule violation"</i> under a plan approved by the U.S. Securities and Exc	hange Commission)?
	nnt-related business having its authorization to do business denied, suspended, revoked, or restricted? membership, barring or suspending its association with other members, or otherwise restricting its activities?	
11F. Has the <i>applicant's</i> or a <i>control affiliate</i> is authorization to act as an attorney, accountant, 11G. Is the <i>applicant</i> or a <i>control affiliate</i> now the subject of any regulatory <i>proceeding</i> that co		
	ay be reported for more than one <i>person</i> or entity using one DRP. File with a completed Exec	ution Page.
	11E, 11F or 11G. Use only one DRP to report details related to the same event. If an event give	-
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 <i>proceeding</i> DRP.	ing. Should they be provided, they will not be accepted as disclosure in lieu of answering the control of the c	questions on this
If a control affiliate is an individual or organization registered through the CRD,	o, such control affiliate need only complete Part I of the applicant's appropriate DRP (BD). Del	tails of the event
	 If a control affiliate is an individual or organization not registered through the CRD, provide co is DRP does not relieve the control affiliate of its obligation to update its CRD records. 	mplete answers
	3	
PART I		
A. The person(s) or entity(ies) for whom this DRP is being	filed is (are):	
☐ The Applicant		
☐ Applicant and one or more control affiliate(s)		
One or more control affiliate(s)		
If this DRP is being filed for a <i>control affiliate</i> , give the fu Middle name).	ull name of the control affiliate below (for individuals, Last name, First	t name,
•	e the CRD number. If not, indicate "non-registered" by checking the	appropriate
NAME OF APPLICANT	APPLICANT CRD NUMBER	
Will Grant Eloant	7117 Elos III7 ellos III ellos El	
BD DRP - CONTROL AFFILIATE		
CRD NUMBER	This <i>Control Affiliat</i> e is □ Firm □ Individual	
CITE NOWIELI	This Control Allillate is	
Registered:		
NAME (For individuals, Last, First, Middle)		
☐ This DRP should be removed from the BD reco	ord because the control affiliate(s) are no longer associated with the l	BD.
B. If the <i>control affiliate</i> is registered through the CRD, has System for the event? If the answer; "Yes," no other info	s the <i>control affiliate</i> submitted a DRP (with Form U-4) or BD DRP to to to to the control on this DRP must be provided.	he CRD
☐ Yes ☐ No	·	
NOTE: The completion of this form does not relieve the	e control affiliate of its obligation to update its CRD records.	

REGULATORY ACTION DISCLOSURE REPORTING PAGE (BD)

(continuation)

P	ART II
1.	Regulatory Action initiated by: SEC Other Federal State SRO Foreign (Full name of regulator, foreign financial regulatory authority, federal, state or SRO)
2.	Principal Sanction: (check appropriate item)
	Civil and Administrative Penalty(ies)/Fine(s) Bar Expulsion Cease and Desist Injunction Censure Denial Restitution Revocation Suspension Undertaking Other
	Other Sanctions:
3.	Date Initiated (MM/DD/YYYY): Exact Explanation
J.	
	If not exact, provide explanation:
4.	Docket/Case Number:
5.	Control Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
.	Employing tim when delivity eccurred which led to the regulatory delicit (ii applicable).
6.	Principal Product Type: (check appropriate item)
	□ Annuity(ies) - Fixed □ Derivative(s) □ Investment Contract(s) □ Annuity(ies) - Variable □ Direct Investment(s) - DPP & LP Interest(s) □ Money Market Fund(s) □ CD(s) □ Equity - OTC □ Mutual Fund(s) □ Commodity Option(s) □ Equity Listed (Common & Preferred Stock) □ No Product □ Debt - Asset Backed □ Futures - Commodity □ Options □ Debt - Corporate □ Futures - Financial □ Penny Stock(s) □ Debt - Government □ Index Option(s) □ Unit Investment Trust(s) □ Debt - Municipal □ Insurance □ Other
7.	Describe the allegations related to this regulatory action. (The information must fit within the space provided.):
8.	Current Status?
9.	If on appeal, regulatory action appealed to: (SEC, SRO, Federal or State Court) and Date Appeal Filed:
	(continued)

REGULATORY ACTION DISCLOSURE REPORTING PAGE (BD)

(continuation)

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only. 10. How was matter resolved: (check appropriate item) Settled Acceptance, Waiver & Consent (AWC) Decision & Order of Offer of Settlement Consent Dismissed Stipulation and Consent Decision Order ∇acated 11. Resolution Date (MM/DD/YYYY): Exact Explanation If not exact, provide explanation: 12. A. Were any of the following Sanctions Ordered? (Check all appropriate items): Monetary/Fine ☐ Revocation/Expulsion/Denial ☐ Disgorgement/Restitution ☐ Cease and Desist/Injunction ☐ Bar Amount: \$ Censure Suspension B. Other Sanctions Ordered: 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 requalify/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 applicant or control affiliate, date paid and if any portion of penalty was waived: 13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates. (The information must fit within the space provided.)

CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (BD)

							GEN	IERAL II	NSTRUC	TIONS		
			ure Re Form			BD) is an 🗆] INITIAL	OR 🗆	AMEND	ED respo	onse used to report details fo	r affirmative responses to
(Check	$\overline{\mathbf{V}}$	item(s) be	eing responded t	o:						
		H(1)	,		domestic or fore							
		(.)	☐ (a	a) o) c)	in the past ten ye ever <i>found</i> that th	ears, <i>enjoine</i> e <i>applicant</i> o pursuant to	or a <i>conti</i> a settlen	<i>rol affiliate</i> nent agre	e was <i>inv</i> eement, a	olved in a an <i>inv</i> esti	e in connection with any inve a violation of investment-relate ment-related civil action brou thority?	ed statutes or regulations?
	11	H(2)		th f 11		ontrol affilia	te now th	he subjec	ct of any	civil <i>proc</i>	ceeding that could result in a	"yes" answer to any part
	Jse a se Executio			r ea	ch event or <i>proceea</i>	<i>ing</i> . An event o	or <i>proceed</i>	<i>ling</i> may b∈	e reported	or more th	nan one <i>person</i> or entity using one	DRP. File with a completed
					ore than one affirmat ate DRPs.	ive answer to I	Item 11H.	Use only o	one DRP to	report deta	ails related to the same event. Uni	elated civil judicial actions
			rement on this D		documents be provid	led for each ev	vent or <i>pro</i>	oceeding. S	Should they	be provid	led, they will not be accepted as di	sclosure in lieu of answering
[t	Details o hrough	of the e the CF	event mu RD, prov	st b de d	e submitted on the $\it a$	ontrol affiliate's	's appropria	ate DRP (B	BD) or DRF	(U-4). If a	ed only complete Part I of the <i>appl</i> a <i>control affiliate</i> is an individual or The completion of this DRP does no	organization not registered
	PART											
			(s) or e	ntit	y(ies) for whom t	his DRP is b	eina file	d is (are)):			
		The A	pplica cant ar	nt d o	ne or more conti		-	,				
f th					, ,	te. aive the f	ull name	of the co	ontrol affi	iate belo	w (for individuals, Last name	. First name. Middle name).
			•			•					'non-registered'' by checking	•
			PPLICAN		9	, , , , , , , , ,					APPLICANT CRD NUMBER	,,
L	BD [DRP -	CONT	RO	L AFFILIATE							
		CRD	NUMBER	!						This Con	ntrol Affiliate is 🔲 Firm 🔲 I	ndividual
	i	L Registe	ered:		☐ Yes ☐	No					_	
		NAM	IE (For in	divid	uals, Last, First, Middle	()						
		Т	his DRF	sh	ould be removed fi	om the BD re	ecord bec	ause the	control af	iliate(s) aı	re no longer associated with the	e BD.
В.					is registered thre t? If the answer is						ed a DRP (with Form U-4) or st be provided.	BD DRP to the CRD
	NOT	E: Th	e com	olet	ion of this Form	does <u>not</u> reli	ieve the	control a	effiliate of	its obliga	ation to update its CRD reco	rds.
F	PARTI	I										
1.	Cour	t Actio	on initia	ted	by: (Name of reg	ulator, <i>foreigr</i>	n financia	al regulato	ory author	ity, SRO,	commodities exchange, agen	cy, firm, private plaintiff, etc.)
		_										

CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (BD) (continuation)

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:					
3.	Filing Date of Court Action (MM/DD/YYYY):					
	If not exact, provide explanation:					
4.	Principal Product Type: (check appropriate item)					
	Annuity(ies) - Fixed					
	Other Product Types:					
5.	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?					
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):					
	If not exact, provide explanation:					

CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (BD)

(continuation)

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only. 11. How was matter resolved: (check appropriate item) □ Consent Judgment Rendered Settled Other Dismissed Opinion Withdrawn ☐ Exact 12. Resolution Date (MM/DD/YYYY): Explanation If not exact, provide explanation: 13. Resolution Detail: A. Were any of the following Sanctions Ordered or Relief Granted? (Check appropriate items): ☐ Revocation/Expulsion/Denial ☐ Disgorgement/Restitution Monetary/Fine Amount \$ Censure ☐ Cease and Desist/injunction Bar Suspension Other Sanctions: 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 requalify/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 applicant or control affiliate, date paid and if any portion of penalty was waived: 14. Provide a brief summary of circumstances related to action(s), allegation(s), disposition(s) and/or finding(s) disclosed above. (The information must fit within the space provided.):

BANKRUPTCY / SIPC DISCLOSURE REPORTING PAGE (BD)

	GENERAL INSTRUCTIONS					
	This Disclosure Reporting Page (DRP BD) is an \square INITIAL OR \square AMENDED response used to report details for affirmative responses to tem 111 of Form BD;					
C	Check ☑ item(s) being responded to:					
	11I In the past ten years has the applicant or a control affiliate of the applicant 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?					
	Jse a separate DRP for each event or <i>proceeding</i> . An event or <i>proceeding</i> may be reported for more than one <i>person</i> or entity using one DRP. File with a completed Execution Page.					
	t is not a requirement that documents be provided for each event or <i>proceeding</i> . Should they be provided, they will not be accepted as disclosure in lieu of answering the questions on this DRP.					
a is	If a control affiliate is an individual or organization registered through the CRD, such control affiliate need only complete Part I of the applicant's appropriate DRP (BD). Details of the event must be submitted on the control affiliate's appropriate DRP (BD) or DRP (U-4). If a control affiliate is an individual or organization not registered through the CRD, provide complete answers to all the items on the applicant's appropriate DRP (BD). The completion of this DRP does not relieve the control affiliate of its obligation to update its CRD records.					
-	PART I					
A.	The person(s) or entity(ies) for whom this DRP is being filed is (are): The Applicant Applicant and one or more control affiliate(s) One or more control affiliate(s)					
	If this DRP is being filed for a control affiliate, give the full name of the control affiliate below (for individuals, Last name, First name, Middle name).					
	If the control affiliate is registered with the CRD, provide the CRD number. If not, indicate "non-registered" by checking the appropriate checkbox.					
	NAME OF APPLICANT CRD NUMBER APPLICANT CRD NUMBER					
	BD DRP - CONTROL AFFILIATE					
	CRD NUMBER This Control Affiliate is ☐ Firm ☐ Individual					
	Registered: Yes No					
	NAME (For individuals, Last, First, Middle)					
В.	This DRP should be removed from the BD record because the <i>control affilliate(s)</i> are no longer associated with the BD. If the <i>control affilliate</i> is registered through the CRD, has the <i>control affilliate</i> submitted a DRP (with Form U-4) or BD DRP to the CRD System for the event? If the answer is "Yes," no other information on this DRP must be provided.					
	☐ Yes ☐ No NOTE: The completion of this Form does <u>not</u> relieve the <i>control affiliate</i> of its obligation to update its CRD records.					
Р	PART II					
1.	Action Type: (check appropriate item) Bankruptcy Declaration Receivership Other					
2.	Compromise ☐ Liquidated ☐ Other ☐ Exact ☐ Explanation					
	If not exact, provide explanation:					

BANKRUPTCY / SIPC DISCLOSURE REPORTING PAGE (BD)

(continuation)

1	
Court ac	Organization <i>investment-related</i> ?
Lactior	currently pending?
If not pe	nding, provide Disposition Type: (check appropriate item)
	ct Payment Procedure
Disposit	ion Date (MM/DD/YYYY):
If not e	xact, provide explanation:
Provide	a brief summary of events leading to the action and if not discharged, explain. (The information must fit within the space provide
	trustee was appointed or a direct payment procedure was begun, enter the amount paid or agreed to be paid by you; or the n
of the tru	ustee:
3	· On · · · · O
	y Open?
Date Dir	ect Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY):
Date Dir	' ' <u> </u>
Oate Dir	ect Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): Exact Explanation
If not e	ect Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): □ Exact □ Explanation xact, provide explanation:
If not e	ect Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): Exact Explanation
If not e	ect Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): Exact Explanation
If not e	ect Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): Exact Explanation
If not e	ect Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): Exact Explanation
If not e	ect Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): Exact Explanation
If not e	ect Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): Exact Explanation
Oate Dir	ect Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): Exact Explanation
If not e	ect Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): □ Exact □ Explanation xact, provide explanation: details to any status/disposition. Include details as to creditors, terms, conditions, amounts due and settlement sched

BOND DISCLOSURE REPORTING PAGE (BD)

GENERAL INSTRUCTIONS					
This Disclosure Reporting Page (DRP BD) is an \square INITIAL OR \square AMENDED response used to report details for affirmative responses to <i>Item 11J</i> of Form BD;					
Check ☑ item(s) being responded to: 11J □ Has a bonding company ever denied, paid out on, or revoked a bond for the applicant?					
Use a separate DRP for each event or <i>proceeding</i> . An event or <i>proceeding</i> may be reported for more File with a completed Execution Page.	ore than one <i>person</i> or entity using one DRP.				
It is not a requirement that documents be provided for each event or <i>proceeding</i> . Should they disclosure in lieu of answering the questions on this DRP.	be provided, they will not be accepted as				
NAME OF APPLICANT	APPLICANT CRD NUMBER				
Firm Name: (Policy Holder)					
2. Bonding Company Name:					
 3. Disposition Type: (check appropriate item) Denied Payout Revoked 4. Disposition Date (MM/DD/YYYY): Exact Explanation 	on				
If not exact, provide explanation:					
5. If disposition resulted in Payout, list Payout Amount and Date Paid:					
 Summarize the details of circumstances leading to the necessity of the bonding company acti provided.) 	ion: (The information must fit within the space				

JUDGMENT / LIEN DISCLOSURE REPORTING PAGE (BD)

GENERAL INSTRUCTIONS					
This Disclosure Reporting Page (DRP BD) is an ☐ INITIAL OR ☐ AMENDED response unitem 11K of Form BD;	sed to report details for affirmative responses to				
Check ☑ item(s) being responded to:					
	11K Does the <i>applicant</i> have any unsatisfied judgments or liens against it?				
Use a separate DRP for each event or <i>proceeding</i> . An event or <i>proceeding</i> may be reported for more than one <i>person</i> or entity using one DRP. File with a completed Execution Page.					
It is not a requirement that documents be provided for each event or <i>proceeding</i> . Should disclosure in lieu of answering the questions on this DRP.	they be provided, they will not be accepted as				
NAME OF APPLICANT	APPLICANT CRD NUMBER				
Judgment/Lien Amount:					
2. Judgment/Lien Holder:					
3. Judgment/Lien Type: (check appropriate item)					
☐ Civil ☐ Default ☐ Tax					
4. Date Filed (MM/DD/YYYY):					
If not exact, provide explanation:	If not exact, provide explanation:				
5. Is Judgment/Lien outstanding? ☐ Yes ☐ No					
If No, provide status date (MM/DD/YYYY):	Explanation				
If not exact, provide explanation:					
If No, how was matter resolved? (check appropriate item)					
☐ Discharged ☐ Released ☐ Removed ☐ Satisfied					
6. Court (Name of Federal, State or Foreign Court), Location of Court (City or County and S	State or Country) and Docket/Case Number:				
7. Provide a brief summary of events leading to the action and any payment schedule deta information must fit within the space provided.):	ils including current status (if applicable). (The				