Form BD

OMB Approval

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# 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, *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 employees 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 Securities Exchange Act of 1934 ("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 Exchange Act 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 Section 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. Sections 15, 15B, 15C, 17(a) and 23(a) of the Exchange Act authorize the SEC to collect the information on this form from registrants. See 15 U.S.C. §§780, 780-4, 780-5, 78q 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 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 an 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 1 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 the 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.
- **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

- Sections 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, the *applicant* must update the appropriate Form BD screens.
- d. A paper copy, with original 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) or DRP (U-4). If a control affiliate is an individual or organization not 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 and who are not required to file a Form U4 (individual registration) with 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 U4 Item 20 or 21.

The CRD mailing address for questions and correspondence is:

NASAA/NASD 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, Guam, or any subdivision or regulatory body thereof.

**PERSON** - An individual, partnership, corporation, trust, or other organization.

**SELF-REGULATORY ORGANIZATION (SRO)** - 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** – For the purpose of Section 6 - Successions, an unregistered entity that assumes or acquires substantially all of the assets and liabilities, and that continues the business of, a predecessor broker-dealer that ceases its broker-dealer activities. [See Exchange Act Section 15(b)(2) and the associated SEC broker-dealer successor rules; see also Exchange Act Release No. 31661 (December 28, 1992), 58 FR 7 (January 4, 1993)]

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

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

**CONTROL AFFILIATE** – For the purpose of Sections 4, 9, 10, 12, and 13 and corresponding disclosure reporting pages (DRPs), a person named in Sections 7, 8, 9, or 10 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 of the applicant 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.

**ENJOINED** - Includes being subject to a mandatory injunction, prohibitory injunction, preliminary injunction, or a temporary restraining 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.

**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.

**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.

**INVESTMENT OR INVESTMENT-RELATED** – Pertaining to securities, commodities, banking, savings association activities, credit union activities, insurance, or real estate (including, but not limited to, acting as or being associated with a broker-dealer, municipal securities dealer, government securities broker or dealer, issuer, investment company,

investment adviser, futures sponsor, bank, savings association, credit union, insurance company, or insurance agency). (This definition is used solely for the purpose of Form BD.)

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

**MINOR RULE VIOLATION** - A violation of a *self-regulatory organization* rule that has been designated as "minor" pursuant to a plan approved by the SEC. 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).

**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.

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

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

Page 1 (Execution Page)  Date: SEC File No: 8 Firm CRD No.:  Failure to keep this form current and to file accurate supplementary information on a timely basis, or the accurate books and records or otherwise to comply with the provisions of law applying to the conduct of	
broker-dealer would violate the Federal securities laws and the laws of the jurisdictions and may result in administrative, injunctive or criminal action.	business as a n disciplinary,
INTENTIONAL MISSTATEMENTS OR OMISSIONS OF FACTS MAY CONSTITUTE CRIMINAL VIOLATION  [ ] APPLICATION [ ] AMENDMENT	IS.
Exact name, principal business address, mailing address, if different, and telephone number of the applicant:	
A. Full name of the applicant (If Sole Proprietor, provide Last, First and Middle name):	
B. IRS Empl. Ident. No.:	
C. (1) The business name under which the broker-dealer primarily conducts business, if different from	<u>1 1A.</u>
(2) List on Schedule D, Page 1, Section I any other name by which the firm conducts business and D. If this filing makes a name change on behalf of an <i>applicant</i> , enter the new name and specify whether the change of the chang	
[ ] applicant's name (1A) or [ ] business name (1C):  Please check above.  E. Firm Main Address: (Do not use a P.O. Box)  Number and Street 1:  Number and Street 2:	
City: State: Country: Zip/Postal Country: Country: Country: Zip/Postal Country: Coun	de:
Branch offices or other business locations must be reported on Schedule E.  F. Mailing Address, if different:  Number and Street 1:  Number and Street 2:	
City: State: Country: Zip/Postal Country: Country: Country: Zip/Postal Country: Coun	de:
G. Business Telephone Number:  H. Contact Employee:  Name:  Title:  Telephone Number:	
EXECUTION:	
For the purpose 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 he 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 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 applica 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 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 wit applicant were a resident in said State(s) and had lawfully been served with process in said State(s).	d by law, and the ant arising out of or in a such action or
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 organizatic 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 m to the applicant's contact employee at the main address, or mailing address if different, given in Items 1E and 1F.  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 appl	nail or confirmed telegram
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 cundersigned 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  By:	
Signature Print Name and Title	
Subscribed and sworn to me this day of, by	
Year Notary Public	
My Commission expires County of State of	
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.  DO NOT WRITE BELOW THIS LINE — FOR OFFICIAL USE ONLY	

	FORM BD	Applicant Name:		,			Offic	ial Us	е	Official Use Only		
	Page 2	Date:		Firm CRD No.	.:	_						
2.	Indicate by checking t is registered or registe			nment authority,	organizatio	on, or jurisdict	ion in which	n the app	licant			
2	If the applicant is registered or registering with the SEC, check here and answer Items 2A through 2D below.											
SIO												
OMMIS		t registered or registe hange Act of 1934?	ring as a brok	er-dealer under	Section 15	(b) or Section	15B of the	[]	[]			
SECURITIES & EXCHANGE COMMISSION		Exchange Act of 1934 and also acting or intending to act as a government securities broker or dealer?										
& EXC	C. Is the <i>applicant</i> registered or registering <u>solely</u> as a government securities broker or dealer under Section 15C of the Securities Exchange Act of 1934?							[]	[]			
TIES	D. Is the applican	t ceasing its activities	as a governm	nent securities br	roker-deale	er?		[]	[]			
SECURI	If the applicant answers "Yes" to Items 2A and 2D, the applicant expressly consents to the withdrawal of its registration as a government securities broker or dealer under Section 15C of the Securities Exchange Act of 1934. See "Instructions".											
0	[]FINRA []NYS	SE ARCA [ ] NADAQ	[ ] CBOE BYX	[ ] CBOE EDGX	[ ] GEMX	[ ]EMERALD	[ ]BOX	[ ] MEMX				
SRO	r - r -	SE CHX [ ] C2	[ ] CBOE BZX	[ ]BX	[ ] MRX	[ ] MIAX	[ ] IEX	[ ] OTHE	R			
Securify   Securify						essee s ont Islands iia iington Virginia onsin ning						
4.	If the applica Social Secu	ant is a sole proprietor rity Number:	r, state full res	idence address	and Social	Security Num	nber.					
	(Number and Street) (City) (State/Country) (Zip + 4/Postal Code)											
5.	dealer?	ant at the time of this		_				YES	S NO []			
6.	Does the <i>ap</i> broker or de	plicant hold or mainta	in any funds o	or securities or pr	rovide clea	ring services t	for any othe	er []	[]			
7.	Does the ap	pplicant refer or introdunglete appropriate iter				ıler?		[]	[]			

	FC	RM BI	Applicant Name:	Officia	l Use	•	Official Use Only				
	F	Page 3	Date: Firm CRD No.:								
8.		Does th	ne <i>applicant</i> have any arrangement with any other <i>person</i> , firm, or organization under	r which:			1				
	A.	any boo	oks or records of the <i>applicant</i> are kept or maintained by such other <i>person</i> , firm or or	ganization?	YES []	ON []	İ				
	В.	account organiza	ts, funds, or securities of the <i>applicant</i> are held or maintained by such other <i>person</i> , fation?	îrm, or		[]	ı				
	C.	account	s, funds, or securities of customers of the <i>applicant</i> are held or maintained by such corganization?	other <i>person</i> ,	[]	[]	ı				
		For purp paragra	ooses of 8B and 8C, do not include a bank or satisfactory control location as defined ph (c) of Rule 15c3-3 under the Securities Exchange Act of 1934 (17 CFR 240.15c3-to any part of Item 8, complete appropriate items on Schedule D, Page 1, Section IV	-3).							
9.		Does ar	ny <i>person</i> not named in Sections 1, 7, 8 or 9, directly or indirectly:				1				
	A.	control t	the management or policies of the applicant through agreement or otherwise?		[]	[]	i				
	B.	Do not a offering course of	or partially finance the business of the applicant?  answer "Yes" to 9B if the person finances the business of the applicant through: 1) a of securities made pursuant to the Securities Act of 1933; 2) credit extended in the c of business by suppliers, banks, and others; or 30 a satisfactory subordination agree in Rule 15c3-1 under the Securities Exchange Act of 1934 (17 CFR 240.15c3-1).	ordinary	[]	[]					
		If "Yes" to any part of Item 9, complete appropriate items on Schedule D, Page 1, Section IV.									
10.	A. Directly or indirectly, does the <i>applicant control</i> , is the <i>applicant controlled</i> by, or is the <i>applicant</i> under common <i>control</i> with, any partnership, corporation, or other organization that is engaged in the securities or investment advisory business?  If "Yes" to item 10A, complete appropriate items on Schedule D, Page 2, Section V.										
44		Directly bank of or foreig If "Yes"	or indirectly, is <i>applicant controlled</i> by any bank holding company, national bank, stathe Federal Reserve System, state non-member bank, savings bank or association, gn bank?  to item 10B, complete appropriate items on Schedule D, Page 3, Section VI.	credit union,	[]	[]					
11.			ropriate DRP for providing details to "yes" answers to the questions in Item 11. Refe of Terms section of Form BD Instructions for explanations of italicized terms.	r to the			İ				
	Α.	In the pa	ast ten years has the <i>applicant</i> or a <i>control affiliate</i> :				1				
Ā		(1)	Been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, for military court to any <i>felony</i> ?	∍ign or	[]	[]	ı				
SURE		(2)	Been charged with a <i>felony</i>		[]	[]	1				
070	B.	In the pa	ast ten years has the <i>applicant</i> or a <i>control affiliate</i> :				i				
CRIMINAL DISCLOS		(1)	Been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, fore military court to a <i>misdemeanor involving</i> : investments or an <i>investment-related</i> bus any fraud, false statements or omissions, wrongful taking of property, bribery, perjur counterfeiting, extortion, or a conspiracy to commit any of these offenses?	iness, or	[]	[]					
S		(2)	Been <i>charged</i> with a <i>misdemeanor</i> specified in 11B(1)?		[]	[]	i				
SURE	C.	Has the ever:	U.S. Securities and Exchange Commission or the Commodity Futures Trading Com	mission			İ				
3708		(1)	Found the applicant or a control affiliate to have made a false statement or omission	1?	[]	[]	i				
REGULATORY ACTION DISCLOSURE		(2)	Found the applicant or a control affiliate to have been involved in a violation of its restatutes?	gulations or	[]	[]	ı				
Y ACTI		(3)	Found the applicant or a control affiliate to have been a cause of an investment-relative having its authorization to do business denied, revoked, or restricted?	ted business	[]	[]	ı				
LATOR		(4)	Entered an <i>order</i> against the <i>applicant</i> or a <i>control affiliate</i> in connection with <i>invest</i> activity?	ment-related	[]	[]	ı				
REGU		(5)	Imposed a civil money penalty on the <i>applicant</i> or a <i>control affiliate</i> , or ordered the <i>a control affiliate</i> to cease and desist from any activity?	applicant or a	[]	[]	Ì				

	FC	ORM	BD	Applicant Name:	Officia	al Us	<b>1</b> 0	Official Jse Only
		Page	e 4	Date: Firm CRD No.:				
	D.		any other f	ederal regulatory agency, state regulatory agency, or foreign financial regu	ılatory			
				the <i>applicant</i> or a <i>control affiliate</i> to have made a false statement or omissunfair, or unethical?	sion or been	YES []	NO []	
				the <i>applicant</i> or a <i>control affiliate</i> to have been involved in a violation of <i>in</i> ulations or statutes?	vestment-	[]	[]	
RE				the <i>applicant</i> or a <i>control affiliate</i> to have been a cause of an <i>investment-i</i> aving its authorization to do business denied, suspended, revoked or restr		[]	[]	
nson				ten years, entered an order against the applicant or a control affiliate in co estment-related activity?	nnection	[]	[]	
REGULATORY ACTION DISCLOSURE			or otherwis	d, suspended, or revoked the <i>applicant's</i> or a <i>control affiliate's</i> registration e, by order, prevented it from associating with an <i>investment-related</i> busin s activities?		[]	[]	
CTI	E.	Has	any self-re	gulatory organization or commodities exchange ever:				
ΥA		(1)	found the a	applicant or a control affiliate to have made a false statement or omission?		[]	[]	
ULATOR		` ,	a violation	applicant or a control affiliate to have been involved in a violation of its rules designated as a "minor rule violation" under a plan approved by the U.S. Singe Commission)?		[]	[]	
REG				applicant or a control affiliate to have been the cause of an investment-rela aving its authorization to do business denied, suspended, revoked or restr		[]	[]	
		(4)	Disciplined barring or s	the <i>applicant</i> or a <i>control affiliate</i> by expelling or suspending it from members suspending its association with other members, or otherwise restricting its	ership, activities?	[]	[]	
	F.	Has cont	or federal	[]	[]			
	G.	ld result in a	[]	[]				
	Н.	(1)	Has any do	omestic or foreign court:				
CLOSURE				past ten years, enjoined the <i>applicant</i> or a <i>control affiliate</i> in connection winnent-related activity?	th any	[]	[]	
				ound that the applicant or a control affiliate was involved in a violation of in a statutes or regulations?	vestment-	[]	[]	
CIVIL JUDICIAL DIS				ismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil nt against the <i>applicant</i> or <i>control affiliat</i> e by a state or foreign financial reg ity?		[]	[]	
CIVIL		(2)		cant or a control affiliate now the subject of any civil proceeding that could er to any part of 11H(1)?	result in a	[]	[]	
JRE	I.			years has the <i>applicant</i> or a <i>control affiliate</i> of the <i>applicant</i> ever been a se iate of a securities firm that:	curities firm			
1507		(1)	Has been t	he subject of a bankruptcy petition?		[]	[]	
FINANCIAL DISCLOSURE			Has had a Protection	trustee appointed or a direct payment procedure initiated under the Securi Act?	ties Investor	[]	[]	
NCIA	J.	Has	a bonding	company ever denied, paid out on, or revoked a bond for the applicant?		[]	[]	
FINA	K.	Doe	s the <i>applic</i>	ant have any unsatisfactory judgments or liens against it?		[]	[]	

	FORM BD	Applicant Name:	Official Use	Official Use Only
	Page 5	Date: Firm CRD No.:		,
12.	any category that	siness engaged in (or to be engaged in, if not yet active) by the <i>applicant</i> . accounts for (or is expected to account for) less than 1% of annual revenue tment advisory business.		
	A. Exchange mer	nber engaged in exchange commission business other than floor activities	[ ] EMC	
	B. Exchange mer	nber engaged in floor activities	[ ]EMF	
	C. Broker or deale	er making inter-dealer markets in corporate securities over-the-counter	[ ] IDM	
	D. Broker or deale	er retailing corporate equity securities over-the-counter	[]BDR	
	E. Broker or deale	er selling corporate debt securities	[ ]BDD	
	F. Underwriter or	selling group participant (corporate securities other than mutual funds)	[ ]USG	
	G. Mutual fund ur	derwriter or sponsor	[ ] MFU	
	H. Mutual fund re	tailer	[]MFR	
	I. 1. U.S. govern	nment securities dealer	[ ]GSD	
	2. U.S. govern	nment securities broker	[ ]GSB	
	J. Municipal secu	rities dealer	[ ]MSD	
	K. Municipal secu	rities broker	[ ] MSB	
	L. Broker or deale	er selling variable life insurance or annuities	[ ]VLA	
	M. Solicitor of time	e deposits in a financial institution	[ ] SSL	
	N. Real estate sy	ndicator	[]RES	
	O. Broker or deale	er selling oil and gas interests	[ ] OGI	
	P. Put and call br	oker or dealer or option writer	[ ] PCB	
	Q Broker or deale	er selling securities of only one issuer or associate issuers (other than mutu	ual funds) []BIA	
	R. Broker or deale	er selling securities of non-profit organizations (e.g., churches, hospitals)	[ ] NPB	
	S. Investment adv	visory services	[ ] IAD	
	T. 1. Broker or d	ealer selling tax shelters or limited partnerships in primary distributions	[ ]TAP	
	2. Broker or d	ealer selling tax shelters or limited partnerships in the secondary market	[ ]TAS	
	U. Non-exchange	member arranging for transactions in listed securities by exchange member	er []NEX	
	V. Trading securi	ties for own account	[ ] TRA	
	W. Private placem	ents of securities	[ ] PLA	
	X. Broker or deale	er selling interests in mortgages or other receivables	[ ] MRI	
	Y. Broker or deale	er involved in a networking, kiosk or similar arrangement with a		
	1. Bank, savir	ngs bank or association, or credit union	[ ]BNA	
	2. Insurance of	company or agency	[ ] INA	
	Z. Other (give deta	ails on Schedule D, Page 1, Section II)	[ ]OTH	
13.	• • •	t effect transactions in commodity futures, commodities or commodity optiors or as a dealer for its own account?	ns as a YES NO	
		t engage in any other non-securities business? De each other business briefly on Schedule D, Page 1, Section II.	[] []	

S	chedule A of FORM BD	Applicant N	lame:						Official Us	se
	EXECUTIVE OFFICERS (Answer for Form BD Item 3)	Date:			Firm C	RD No.:				
1.	Use Schedule A only in new app applicant. Use Schedule B in ne Schedule C. <b>Complete each co</b>	ew applicati								
2.	List below the names of:									
	(a) Each Chief Executive Officer Officer, Director, and individu					s Officer, C	hief	Leg	al Officer, Chief Com	pliance
	(b) In the case of an <i>applicant</i> that is a corporation, each shareholder that directly owns 5% or more of a class of a voting of the <i>applicant</i> , unless the <i>applicant</i> is a public reporting company (a company subject to Sections 12 or 15(d) of the Securities Exchange Act of 1934).  Direct owners include any <i>person</i> that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 5% or more of a class of a voting security of the <i>applicant</i> . 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 right to acquire, within 60 days, through the exercise of any option, warrant or right to purchase the security.									
	(c) In the case of an <i>applicant</i> the the right to receive upon diss									at have
	(d) In the case of a trust that directly owns 5% or more of a class of a voting security of the <i>applicant</i> , or that has the right to receive upon dissolution, or has contributed, 5% or more of the <i>applicant</i> 's capital, the trust and each trustee.									
	(e) In the case of an <i>applicant</i> that is a Limited Liability Company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 5% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.									
3.	Are there any indirect owners or	the applic	ant required to be	repo	rted on	Schedule	B?		[ ] Yes [ ] No	
4.	In the "DE/FE/I" column, enter "I domiciled in a foreign country, o					nter "FE" if	own	er is	s an entity incorporate	ed or
5.	Complete the "Title or Status" co shareholder; and for shareholde									etor, or
6.	Ownership Codes are:  NA - less than 5%  A - 5% but less than 10%		- 10% but less the - 25% but less the			D - 5			ess than 75% ore	
7.	(a) In the "Control Person" colun "No" if the <i>person</i> does not h general partners, and trustee	ave control	. Note that under	this						
	(b) In the "PR" column, enter "PF Exchange Act of 1934.	R" if the ow	ner is a public rep	ortin	g comp	any under s	Secti	ons	12 or 15(d) of the Se	curities
(	FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)    DE/FE/I   Title or Status   Date Title or Status   Control Status Acquired   Code   Person   Code   Person   Code   Person   Code   Person   Code   Person   Code   Code   Person   Code									
		1	<u> </u>				l			

Schedule B of FORM E	$ \mathbf{BD} _A$	pplicant Name:							Official Us	e
INDIRECT OWNERS (Answer for Form BD Item 3)		)ate:			Firm CF	RD No.:				
Use Schedule A only in nev A in new applications to pro column.										
2. With respect to each owner	r listed	on Schedule A, (e	xcept ind	ividu	al own	ers), list bel	ow:			
has the power to sell or For purposes of this Sch grandchild, parent, step law, brother-in-law, or si	(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, <b>all</b> 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	(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 ("LLC"), (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 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.										
In the "DE/FE/I" column, en domiciled in a foreign countries.						nter "FE" if	own	er is	an entity incorporate	ed or
5. Complete the "Status" column owned (if more than one is			trustee, s	hare	holder,	etc., and if	shaı	reho	lder, class of securition	es
6. Ownership Codes are: C - 25% but less than 50%	% D -	- 50% but less th	an 75%	E	- 75	i% or more	F	- (	Other General Partne	ers
7. (a) In the "Control Person" "No" if the <i>person</i> does general partners, and tro	not hav	re control. Note th	at under	this (						
(b) In the "PR" column, ente Securities Exchange Ac			ublic rep	orting	g comp	any under s	Secti	ions	12 or 15(d) of the	
FULL LEGAL NAME (Individuals: Last Name, First Name, Middle	DE/FE/I	Entity in Which Interest is Owned	Status		e Status quired	Ownership Code	Con		CRD No. If None: S.S. No., IRS Tax No. or	Official Use
Name)				ММ	YYYY			PR	Employer ID	Only
				1			l			

Schedule C of FORM AMENDMENTS TO	BD		Applicant Name:								Official Use		
SCHEDULES A & B (Answer for Form BD Item	3)	Date:_					Firm C	RD No.:					
1. This Schedule C is used	to ame	nd Sch mplet	d Schedules A and B of Form BD. Refer to those schedules for specific instructions for <b>nplete each column.</b> File with a completed Execution Page (Page 1).										
<ol> <li>In the Type of Amendme about the same person)</li> </ol>	nt ("Typ	. Of A	.md."	) column,	, indicate	"A" (	additio	n), "D" (dele	etion	), or	"C" (change in inform	nation	
3. Ownership Codes are:  NA - less than 5%  A - 5% but less th	nan 10%				ut less tha			D - 5 E - 7			ess than 75% ore		
4. List below all changes			<b>A</b> : (D	irect Ow	ners an	d Ex	ecutive	Officers)					
FULL LEGAL NAME (Individuals: Last Name, First Name, Midd			E/FE/I		r Status	Date	e Title or s Acquired	Ownership Code	Con Pers	son	CRD No. If None: S.S. No., IRS Tax No. or Employer ID	Official Use Only	
						MM	YYYY			PR			
5. List below all changes	to Sche	dule	B: (Ir	ndirect C	)wners)	ı				1		I	
FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Entity	in Whic	ch Interest is ned	Status	Ac	e Status quired	Ownership Code	Cont	on	CRD No. If None: S.S. No., IRS Tax No. or Employer ID	Official Use Only	
<i>,</i>		+				MM	YYYY			PR			
		_											
		+											
		+											

Schedule D of FORM BD	Applicant Name:			Official Use	Officia Use Only
Page 1	Date:	Firm CRD No	D.:		
Use this Schedule D Page 1 to report previously submitted details. Do not This is an [ ] INITIAL [ ] AMEN	t repeat previously s			r changes/updates to	
Section I Other Business	Names				
(Check if applicable) [ ] Item 1C(2)					
List each of the "other" names and t	the <i>jurisdiction(s)</i> in	which they are used.			
1. Name	Jurisdiction	2. Name		Jurisdiction	
3. Name	Jurisdiction	4. Name		Jurisdiction	
Section II Other Business				<u> </u>	1
(Check one) [ ] Item Applicant must complete a separate			onse in this section	on.	
Briefly describe any other business this sheet for additional comments i	,,,	ther non-securities busine	ss (ITEM 13B).	Use reverse side of	
Section III Successions					
(Check if applicable) [ ] Item 5					
Date of Succession MM DD YYYY / /	Name of Predecessor				
Firm CRD Number	IRS Employer Num	nber (if any)	SEC File Number (if	any)	
Briefly describe details of the succe side of this sheet for additional com		assets or liabilities not ass	umed by the suc	cessor. Use reverse	
Section IV Introducing and	l Clearing Arrange	ments / Control Persons	/ Financings		
Applicant must complete a separate multiple responses to any item. Cor or agreement became effective. Withe change.	mplete the "Effective	1 for each affirmative respondence Date" box with the Month	, Day and Year t	hat the arrangement	
Firm or Organization Name		CRI	Number (if any)		
Business Address (Street, City, State/Country, Zip + 4	Postal Code)		ctive Date	Termination Date MM DD YYYY / /	
Individual Name		CRI	Number (if any)		
Business Address (if applicable) (Street, City, State/Co	ountry, Zip + 4 Postal Code)		ctive Date	Termination Date MM DD YYYY / /	
Briefly describe the nature of refere (ITEM 9A); or the method and amounecessary.					

Schedule D of FORM BD	Applicant Name:				Official Use
Page 2	Date:	_ Firr	n CRD No.:		
Use this Schedule D Page 3 to reppreviously submitted details. Do not corporations, organizations, institut copies of Schedule D Page 2 if necessity.	ot repeat previous ions and individua	sly submitted informa	tion. Supply d	details for all p	artnerships,
Use the "Effective Date" box to entorecent change in the affiliation.	er the Month, Day	, and Year that the a	ffiliation was e	effective or the	date of the most
This is an [ ] INITIAL	[ ] AMENDED	detail filing for Form	n RD Item 10A		
[ ] 10A. Directly or indirectly, doe with, any partnership, co advisory business?	es applicant contr	ol, is applicant contro	olled by, or is a	applicant unde	
Section V Complete this	section for contr	rol issues relating to	ITEM 10A o	nly.	
The details supplied relate to:					
1. Partnership, Corporation, or Organization N	ame			CRD Number (if ar	ny)
(check only one)	1 controls applicant	[ ] is controlled by applicant	[ ] io undor o	common control with	annliaant
This Partnership, Corporation, or Organization [  Business Address (Street, City, State/Country, Zip +	·	[ ] is controlled by applicant	Effective Date	common control with	Termination Date
Casanoso Acadesa (career, eng, etato escana), 2,p -	m ostar code)		MM DD YYY	Y	MM DD YYYY
Is Partnership, Corporation or Organization a foreign entity"  [ ] Yes [ ] No	ovide country of domicile oration"	Check "Yes" or "No" for activities of this partnership Corporation, or organization	Securitie Activities	es [ ]Yes [ ]No s:	Investment Advisory [ ] Yes [ ] No Activities:
Briefly describe the <i>control</i> relationship. Use reverse	e side of this sheet for add	litional comments if necessary.			1
2. Partnership, Corporation, or Organization N	ame			CRD Number (if ar	ny)
(check only one) This Partnership, Corporation, or Organization [	] controls applicant	[ ] is controlled by applicant	[ ] is under o	common control with	applicant
Business Address (Street, City, State/Country, Zip +	4/Postal Code)		Effective Date  MM DD YYYY	Y	Termination Date  MM DD YYYY  / /
Is Partnership, Corporation or Organization a foreign entity"  [ ] Yes [ ] No	ovide country of domicile oration"	Check "Yes" or "No" for activities of this partnership Corporation, or organization	Securitie Activities	es [ ]Yes [ ]No s:	Investment Advisory [ ] Yes [ ] No Activities:
Briefly describe the <i>control</i> relationship. Use reverse	e side of this sheet for add	litional comments if necessary.			
3. Partnership, Corporation, or Organization N	ame			CRD Number (if ar	ny)
(check only one)  This Partnership, Corporation, or Organization [	] controls applicant	[ ] is controlled by applicant	[ ] is under o	common control with	applicant
Business Address (Street, City, State/Country, Zip +	4/Postal Code)		Effective Date  MM DD YYY	Y	Termination Date  MM DD YYYY  / /
Is Partnership, Corporation or Organization a foreign entity"  [ ] Yes [ ] No	ovide country of domicile oration"	Check "Yes" or "No" for activities of this partnership Corporation, or organization	Securitie Activities	es [ ]Yes [ ]No s:	Investment Advisory [ ]Yes [ ]No Activities:
Briefly describe the control relationship. Use reverse If applicant has more than 3 organi.			schedule D Pa	nge 2s.	

Schedule D of FORM BD	Applicant Name:				Official Use	Use Only
Page 3	Date:		Firm CRD No.:			
Use this Schedule D Page 3 to report previously submitted details. Do not corporations, organizations, institution copies of Schedule D Page 3 if necessary	ot report previously submi ions and individuals nece	itted inforn	nation. Supply de	tails for a	II partnerships,	
Use the "Effective Date" box to enter recent change in the affiliation.	er the Month, Day, and Y	ear that the	e affiliation was ef	fective or	the date of the most	
This is an [ ] INITIAL	[ ] AMENDED det	ail filing fo	r Form BD Item 10	0B		
[ ] 10B. Directly or indirectly, is a bank of the Federal Reserve Systembank?	applicant controlled by ar	y bank ho	lding company, na	ational ba		
Section VI Complete this s	section for control issue	es relating	to ITEM 10B on	ly.		1
Provide the details for each organiz institution in the applicant's chain of	ation or institution that <i>co</i> fownership. The details	ontrols the supplied re	<i>applicant</i> , includir elate to:	ng each c	organization or	
Financial Institution Name		CRD Num	ber (if applicable)			1
Institution Type (i.e., bank holding company, r Federal Reserve System, state non-member union, or foreign bank)			Effective Date	MM DD YY		
			Termination Date	MM DD YY / /		
Business Address (Street, City, State/Country	, Zip + 4/Postal Code		If foreign, country of	domicile or	incorporation	
Briefly describe the control relationship. Use	reverse side of this sheet for add	ditional comm	nents, if necessary.			
2. Financial Institution Name		CRD Num	ber (if applicable)			
Institution Type (i.e., bank holding company, i Federal Reserve System, state non-member union, or foreign bank)			Effective Date	MM DD YY / /	ΥΥ	
			Termination Date	MM DD YY / /	ΥY	
Business Address (Street, City, State/Country	, Zip + 4/Postal Code		If foreign, country of	domicile or	incorporation	
Briefly describe the control relationship. Use	reverse side of this sheet for add	ditional comm	nents, if necessary.			1
Financial Institution Name		CRD Num	ber (if applicable)			
Institution Type (i.e., bank holding company, r Federal Reserve System, state non-member union, or foreign bank)			Effective Date	MM DD YY	YY	
,			Termination Date	MM DD YY	ΥY	
Business Address (Street, City, State/Country	r, Zip + 4/Postal Code		If foreign, country of	domicile or	incorporation	
Briefly describe the control relationship. Use	reverse side of this sheet for ad-	ditional comm	nents, if necessary.			
4. Financial Institution Name		CRD Num	ber (if applicable)			1
Institution Type (i.e., bank holding company, r Federal Reserve System, state non-member union, or foreign bank)			Effective Date	MM DD YY	YY	
· · · ·			Termination Date	MM DD YY / /	ΥΥ	
Business Address (Street, City, State/Country	, Zip + 4/Postal Code		If foreign, country of	domicile or	incorporation	1
Briefly describe the control relationship. Use	reverse side of this sheet for add	ditional comm	nents, if necessary.			1
If applicant has more than 4 organiz	zations/institutions to ren	ort comple	ete additional Sch	edule D r	nane 3s	1

Form BD, Uniform Application for Broker-Dealer Registration (5-23)

Page 3   Delot   Firm CRD No:	Sched	ule E of FORM BD	eference in Rules 69W-600. Applicant Name:							
Senerat: Use this schedulate register or sport branch offices or the business locations of the applicant. Repeat litems 1-12 for each branch office or of their business location is using a mann inconnaction with securities activities on the schedular as necessary if this branch office or or other business location is using a mann inconnaction with securities activities of this schedular as necessary if this branch office or other business location is using a mann inconnaction with securities activities of this schedular as necessary if the schedular as necessary if the schedular as necessary if the schedular as necessary if the schedular as necessary in the schedular as necessary in the schedular as the schedular as necessary in the schedular as the schedular a		Page 3	Date:	Firm CRD No.:						
or or their business location. Each item must be completed unless otherwise noted. Use additional copies of this schedule as necessary, if this branch office or other business location is using a name in connection with securities activities other than the applicant of name, such name must be reported under item 1(2) on Page 1 of this Form.  Rem 1. Specific:  Rem 1. Specific:  Rem 1. Specific:  Rem 1. Specific:  CRD vide business location is closed, and "Amendment" to indicate any other change to previously filed information.  Rem 2. CRD vide assign this branch office or other business location is closed, and "Amendment" to indicate any other change to previously filed information.  Rem 3. CRD vide assign this branch number when the applicant adds a branch office or other business location as discussed in Item 1 above. If know, complete this item for all deletions and amendments.  The Billing Code is an alpha/turneric value consisting of up to elght characters. It is the responsibility of the firm to establish and maintain is consistent to the consistence of th				-						
Item 1. Specify only one box. Check "Add" when a branch office or other business location is opened and the applicants (ling the initial notice).  Total control of the con	General:	or other business location. Ea this branch office or other busin	ch item must be completed unle ness location is using a name in c	ss otherwise noted. Use additional cor connection with securities activities oth	pies of this schedule as necessary. If					
Toleleis* when a branch office or other business location is closed, and "Amendment" to indicate any other change to previously filed information.			A .l.1"l							
known, complete this item for all deletions and aimendments. Item 3.  Item 4.  Complete billing Code is an alpha/mumoric value consisting of up to elight characters. It is the responsibility of the firm to establish and maintain its own unique billing codes. This is not a required field.  Item 4.  Complete this item for all entries. A physical location must be included; post office box designations alone are not sufficient.  Complete this item on a lent the applicant changes the address of an existing branch office or other business location.  Item 6.  Item 7.  Complete this item on all entries. Entries the name of the suspensive system on princises within a bank, savings bank or association, credit union, or other hisancial institution, enter the name of the suspensive provided.  Item 8.  Complete this item of all entries. Envirol the name of the suspensive provided.  Item 9.  Complete this item of all entries. Envirol the name of the suspensive provided.  Item 9.  Complete this item of all entries. Envirol the name of the suspensive provided.  Item 10.  Check "Yes" or "No to denote whether the location is a business location was opened (ADD), closed (DELETE), or the effective date of the change (AMENDMENT).  Item 10. Check "Yes" or "No to denote whether the location is a business location that will operate pursuant to a written agreement or contract (other than an insurance agency agreement) with the main office and any one or more of the following will apply the first than the applicant; (b) has primary responsibility for decisions relating to the employment and remuneration of the segistered representatives to be "independent contractors" for tax purposes; or (0) engages in separate market making and/or underwriting activities.  Item 12. Check hard propriate blowless if the branch of the branch office and any one or more of the following will applicant in changing the address, enter the new address in Item 5.  Item 12. Post the appropriate bowed by a party other than the applicant (b) has primary responsibi	item 1.	"Delete" when a branch office								
titem 3. The Billing Code is an alpha/numeric value consisting 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 field. Complete this litem of ywhen the applicant changes the address of an existing branch office or other business location. If the branch office or other business location must be included; post office box designations alone are not sufficient. Item 5. The properties of the properties within a bank, savings bank or association, credit union, or other huracide institution, enter the name of the institution in the space provided. Complete this litem of all entries. Enter the name of the subjective or registered representative in charge who is physically at this union, or other thancial institution, enter the name of the subjective or registered representative in charge who is physically at this union, or other thancial institution, enter the name of the supervisor or registered representative in charge who is physically at this union, or other thancial institution, enter the name of the supervisor or registered representative in charge who is physically at this the subject of the provision of the supervisor or registered representative in charge who is physically at this or the effective date of the charge (AMENDMENT).  Item 10. Check "Yes" or "No" to denote whether the location will be an Office of Supervisory Jurisdiction (QSJ) as defined in FINRA rules, litem 11. Check "Yes" or "No" to denote whether the location in a business location stream the provision of the supervisor or more of the following will apply: the location (A) assumes liability for its own expensement or contract (other than an insurance agency agreement) with the main office and any one or more of the following will apply: the location (A) assumes liability for its own expensement or contract (other than an insurance agency agreement) with the main office and any one or more of the following will apply: the location (A) assumes liability	Item 2.			branch office or other business locati	on as discussed in Item 1 above. If					
titem 5. Complete this item end, when the applicant changes the address of an existing branch office or other business location, credit union, or other financial institution, enter the name of the institution in the space provided.  The provided the CRD number for the branch office supervisor named in Item 7. Complete this item for all entries. Enter the name of the supervisor or registered representative in charge who is physically at this location.  Item 8. Provide the CRD number for the branch office supervisor named in Item 7. Complete this item for all entries. Provide the date that the branch office or other business location was opened (ADD), closed (DELETE), or the effective date of the change (AMELMEMET).  Item 10. Check "Yes" or "No" to denote whether the location will be an Office of Supervisory Jurisdiction (OSJ) as defined in FINRA rules. Item 11. Check "Yes" or "No" to denote whether the location is a business location that will operate pursuant to a written agreement or contract (other than an insurance agency agreement) with the main office and any one or more of the following will apply: the location (A) assumes liability for its own expenses on has its expenses paid by a party other than the applicant; (B) has primary responsibly of decisions relating to the employment and remuneration of its registered representatives; (C) deems 5% or more of its fold registered representatives; (C) deems 5% or more of its fold registered representatives; (C) deems 5% or more of its fold registered representatives; (C) deems 5% or more of its fold registered representatives; (C) deems 5% or more of its fold registered representatives; (C) deems 5% or more of its fold registered representatives; (C) deems 5% or more of its fold registered representatives; (C) deems 5% or more of its fold registered representatives; (C) deems 5% or more of its fold registered representatives; (C) deems 5% or more of its fold registered representatives; (C) deems 5% or more of its fold registered representatives; (C) deems 5% or	Item 3.			ight characters. It is the responsibility o	of the firm to establish and maintain					
It the thranch office or other business location occupies or shares space on premises within a bank, savings bank or association, credit union, or other financial institution, enter the name of the institution in the space provided.  Complete this item for all entries. Enter the name of the institution in the space provided.  Provide the CRD number for the branch office supervisor or registered representative in charge who is physically at this location.  Provide the CRD number for the branch office supervisor or registered representative in charge who is physically at this location.  Provide the CRD number for the branch office supervisor or registered representative in charge who is physically at this location.  Provide the CRD number for the branch office supervisor or or other business location was opened (ADD), closed (DELETE), or the effective date of the change (AMEXDMENT).  Item 10. Check "Yes" or "No" to denote whether the location will be an Office of Supervisory Jurisdiction (OSJ) as defined in FINRA rules.  Item 11. Check "Yes" or "No" to denote whether the location is a business location that will operate pursuant to a written agreement or contract (other than an insurance) agency agreemently with the main office agreement or or more of the Identity of the provision of the provision of the provision and insurance agency agreemently with the main office agreement or or more of the Identity of the provision of the employment and remuneration of its registered representatives. (C) deems 5% or more of its total registered representatives. (C) deems 5% or more of its total registered representatives. (C) deems 5% or more of its total registered representatives. (C) deems 5% or more of its total registered representatives. (C) deems 5% or more of its total registered representatives. (C) deems 5% or more of its total registered representatives. (C) deems 5% or more of its total registered representatives. (C) deems 5% or more of its total registered representatives. (C) deems 5% or more of its total regi										
union, or other financial institution, enter the name of the institution in the space provided.  Item 7.  Item 8.  Item 8.  Item 9.  The divide the CRD number for the branch office supervisor or register depresentative in charge who is physically at this location.  Item 9.  The divide the CRD number for the branch office supervisor named in Item 7.  Complete this item for all entries. Provide the date that the branch office or other business location was opened (ADD), closed (DELETE), or the effective date of the change (AMENDMENT).  Item 10. Check "Yes" or "No" to denote whether the location is a business location that will operate pursuant to a written agreement or contract (other than an insurance agency agreement) with the main office and any one or more of the following will apply; the location (A) assumes liability for its own expenses or has its separeses paid by a party other than the applicant; (B) has primary responsibly for decisions relating to the employment and remuneration of its registered representatives; (C) deems 5% or more of its total registered representatives to be "independent contractors" for tax purposes, or (D) engages in separate market making paridor undewning activities.  Item 12. Check the appropriate box(es) if the branch or other business location is registering with FINRA or registering or reporting with a jurisdiction.  1. Check only one box: [] Add [] Delete [] Amendment  2. CRD Branch Number []  3. Billing Code []  Fig. Box (if applicable), Suite, Floor []  State/Country, Zip Code + 4/Postal Code [] Amendment  4. Street []  P.D. Box (if applicable), Suite, Floor [] Add [] Delete [] Amendment  2. CRD Branch Number []  5. Street []  P.D. Box (if applicable), Suite, Floor []  Fifective Date (MMDDYYYY)  10. OS [] Yes [] No  11. [] Yes [] No  State/Country, Zip Code + 4/Postal Code []  P.D. Box (if applicable), Suite, Floor []  Fifective Date (MMDDYYYYY)  10. OS [] Yes [] No  State/Country, Zip Code + 4/Postal Code []  P.D. Box (if applicable), Suite, Floor []  Fifective Date (MM										
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Item 12 Check the appropriate box(es) if the branch or other business location is registering with FINRA or registering or reporting with a jurisdiction.   Check only one box:		to the employment and remur	neration of its registered represe	entatives; (C) deems 5% or more of it	s total registered representatives to					
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P.O. Box (if applicable), Suite, Floor   State/Country, Zip Code + 4/Postal Code   10. OSJ [] Yes [] No   11. [] Yes [] No   11. [] Yes [] No   12. FINRA [] Jurisdiction []   12. FINRA [] Jurisdiction []   12. FINRA [] Jurisdiction []   13. FINRA [] Jurisdiction []   14. FINRA [] Jurisdiction []   15. FINRA [] Jurisdiction	S. Dilling	Code								
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Street	If applica	nt is changing the address, ent	ter the new address in Item 5.	11. [ ] Yes [ ] No						
A [ ] B [ ] C [ ] D [ ]				If Yes, indicate each Item 11 subset	that applies					
12. FINRA [ ] Jurisdiction [ ]		or (if any line late). Or its Element		A[] B[] C[] D[	]					
1. Check only one box: [] Add [] Delete [] Amendment  2. CRD Branch Number		, ,		12. FINRA [ ] Jurisdiction [ ]						
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If applicant is changing the address, enter the new address in Item 5.  11. [ ] Yes [ ] No  4	Ctata "	Country Zin Codo : 4/D+-1 C	ado.	10. OSJ [ ] Yes [ ] No						
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			rode	12. FINRA [ ] Jurisdiction [ ]						

#### **CRIMINAL DISCLOSURE REPORTING PAGE (BD)**

	GENERAL INSTRUCTIONS	
	This Disclosure Reporting Page [DRP (BD)] is an [ ] INITIAL <b>OR</b> [ ] AMENDED response to report details for affirmative responses to <b>Items 11A and 11B</b> of Form BD;	
	Check [√] item(s) being responded to:	
	11A. In the past ten years has the applicant or a control affiliate:	
	[ ] (1) Been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign or military court to any felony?	
	[ ] (2) Been charged with a felony?	
	11B. In the past ten years has the applicant or a control affiliate:	
	[ ] (1) Been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign or military court to a misdemeanor involving: investments or an investment-related business, or any fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	
	[ ] (2) Been charged with a misdemeanor specified in 11B(1)?	
	a separate DRP for each event or <i>proceeding</i> . An event or <i>proceeding</i> may be reported for more than one person or using one DRP. File with a completed Execution Page.	
crimii DRP	ole counts of the same charge arising out of the same event(s) should be reported on the same DRP. Unrelated hal actions, including separate cases arising out of the same event, must be reported on separate DRPs. Use this to report all charges arising out of the same event. One event may result in more than one affirmative answer to the elitems.	
Part I DRP comp	ontrol affiliate is an individual or organization registered through the CRD, such control affiliate need only complete of the applicant's appropriate DRP (BD). Details of the event must be submitted on the control affiliate's appropriate (BD) or DRP (U-4). If a control affiliate is an individual or organization not registered through the CRD, provide lete answers to all the items on the applicant's appropriate DRP (BD). The completion of this DRP does not relieve ontrol affiliate of its obligation to update its CRD records.	
sente	cable court documents (i.e., criminal complaint, information or indictment as well as judgment of conviction or incing documents) must be provided to the CRD if not previously submitted. Documents will not be accepted as	
disclo	osure in lieu of answering the questions on this DRP.	
	5 1	
PAF		
PAF	RTI	
	The person(s) or entity(ies) for whom this DRP (BD) is being filed is (are):	
PAF	The person(s) or entity(ies) for whom this DRP (BD) is being filed is (are):  [ ] The Applicant	
PAF	The person(s) or entity(ies) for whom this DRP (BD) is being filed is (are):  [ ] The Applicant  [ ] Applicant and one or more control affiliate(s)	
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PAF	The person(s) or entity(ies) for whom this DRP (BD) 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	
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PAF	The person(s) or entity(ies) for whom this DRP (BD) 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  Applicant CRD Number	
PAF	The person(s) or entity(ies) for whom this DRP (BD) is being filed is (are):  [ ] The Applicant  [ ] Applicant and one or more control affiliate(s)  [ ] 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  Applicant CRD Number  BD DRP - CONTROL AFFILIATE	
PAF	The person(s) or entity(ies) for whom this DRP (BD) 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  Applicant CRD Number  BD DRP - CONTROL AFFILIATE  CRD NUMBER  This Control Affiliate is [ ] Firm [ ] Individual	
PAF	The person(s) or entity(ies) for whom this DRP (BD) is being filed is (are):  [ ] The Applicant [ ] Applicant and one or more control affiliate(s) [ ] 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  Applicant CRD Number  BD DRP - CONTROL AFFILIATE  CRD NUMBER  This Control Affiliate is [ ] Firm [ ] Individual Registered: [ ] Yes [ ] No	
PAF	The person(s) or entity(ies) for whom this DRP (BD) 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  Applicant CRD Number  BD DRP - CONTROL AFFILIATE  CRD NUMBER  This Control Affiliate is [ ] Firm [ ] Individual	
PAF	The person(s) or entity(ies) for whom this DRP (BD) is being filed is (are):  [ ] The Applicant [ ] Applicant and one or more control affiliate(s) [ ] 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  Applicant CRD Number  BD DRP - CONTROL AFFILIATE  CRD NUMBER  This Control Affiliate is [ ] Firm [ ] Individual Registered: [ ] Yes [ ] No	
PAF	The person(s) or entity(ies) for whom this DRP (BD) is being filed is (are):  [ ] The Applicant [ ] Applicant and one or more control affiliate(s) [ ] 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  Applicant CRD Number  BD DRP - CONTROL AFFILIATE  CRD NUMBER  This Control Affiliate is [ ] Firm [ ] Individual Registered: [ ] Yes [ ] No  NAME (For individuals, Last, First, Middle)  [ ] This DRP should be removed from the BD record because the control affiliate(s) are no longer	

**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)

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If charge(s) were brought against an organization over which the applicant or control affiliate exercise(d) control: organization name, whether or not the organization was an investment-related business and the applicant's or coaffiliate's 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 and State or Country, Docket/Case number).				
Event Disclosure Detail (Use this for both organizational and individual charges.)					
A.	Date First Charged (MM/DD/YYYY): [ ] Exact [ ] Explanation				
If n	not exact, provide explanation:				
В.	Event Disclosure Detail (include Charge(s)/Charge Description(s), and for each charge provide: <u>1.</u> number of counts, <u>2.</u> felony or misdemeanor, <u>3.</u> plea for each charge, and <u>4.</u> product type if charge is investment-related):				
C.	Did any of the Charge(s) within the Event involve a Felony? [ ] Yes [ ] No  Current status of the Event? [ ] Pending [ ] On Appeal [ ] Final				
E.	Event Status Date (complete unless status is Pending) (MM/DD/YYYY):  [ ] Exact [ ] Explanation				
lf n	oot exact, provide explanation:				
pre	Disposition Disclosure Detail: Include for each charge, <u>A.</u> Disposition Type [e.g., convicted, acquitted, dismissed, pretrial, etc.], <u>B.</u> Date, <u>C.</u> Sentence/Penalty, <u>D.</u> Duration [if sentence-suspension, probation, etc.], <u>E.</u> Start Date of Penalty, <u>F.</u> Penalty/Fine Amount and <u>G.</u> Date Paid.				
Pro	ovide a brief summary of the circumstances leading to the charge(s) as well as the disposition. Include the releva				
dat	tes when the conduct which was the subject of the char(s) occurred. (The information must fit within the space ovided.)				

## **REGULATORY ACTION DISCLOSURE REPORTING PAGE (BD)**

	GENERAL INSTRUC	TIONS
	This Disclosure Reporting Page [DRP (BD)] is an [ ] INITIAL OR [ ] AI	
	to <i>Items 11C, 11D, 11E, 11F, or 11G</i> of Form BD;	
	Check [v] item(s) being responded to:  11C. Has the U.S. Securities and Exchange Commission or the Commodity Futures Trac	ing Commission ever:
	[ ] (1) Found the applicant or a control affiliate to have made a false statement or or	
	<ul> <li>(2) Found the applicant or a control affiliate to have been involved in a violation</li> <li>(3) the applicant or a control affiliate to have been a cause of an investment-relation</li> </ul>	
	restricted? [ ] (4) Entered an order against the applicant or a control affiliate in connection with	investment-related activity?
	[ ] (5) Imposed a civil money penalty on the applicant or a control affiliate, or order	
	11D. Has any other federal regulatory agency, state regulatory agency, or foreign financial (1) [1] (1) Ever found the applicant or a control affiliate to have made a false statemen	
	[ ] (2) Ever found the applicant or a control affiliate to have been involved in a viola	
	[ ] (3) Ever found the applicant or a control affiliate to have been a cause of an invisuspended, revoked or restricted?	estment-related business having its authorization to do business denied,
	[ ] (4) In the past ten years, entered an order against the applicant or a control affil [ ] (5) Ever denied, suspended, or revoked the applicant's or a control affiliate's reinvestment-related business or restricted its activities?	
	11E. Has any self-regulatory organization or commodities exchange ever:	starter 2
	<ul> <li>[ ] (1) found the applicant or a control affiliate to have made a false statement or or</li> <li>[ ] (2) found the applicant or a control affiliate to have been involved in a violation or</li> </ul>	
	approved by the U.S. Securities and exchange Commission)? [ ] (3) found the applicant or a control affiliate to have been the cause of an investr	nent-related business having its authorization to do business denied, suspended,
	revoked or restricted? [ ] (4) Disciplined the applicant or a control affiliate by expelling or suspending it from	m membership, barring or suspending its association with other members, or
	otherwise restricting its activities?  11F. [ ] Has the applicant's or a control affiliate's authorization to act as an attorney, act	ountant, or federal contractor ever been revoked or suspended?
	11G. [ ] Is the applicant or a control affiliate now the subject of any regulatory proceeding	g that could result in a "yes" answer to any part of 11C, D, or E?
	separate DRP for each event or <i>proceeding</i> . An event or <i>proceeding</i> ma File with a completed Execution Page.	be reported for more than one person or entity using one
	vent may result in more than one affirmative answer to Items 11C, 11D, 1 me event. IF an event gives rise to actions by more than one regulator, p	
	t a requirement that documents be provided for each event or proceeding sure in lieu of answering the questions on this DRP.	. Should they be provided, they will not be accepted as
applica control	ntrol affiliate is an individual or organization registered through the CRD, sent's appropriate DRP (BD). Details of the event must be submitted on the laffiliate is an individual or organization not registered through the CRD, priate DRP (BD). The completion of this DRP does not relieve the control	e control affiliate's appropriate DRP (BD) or DRP (U-4). If a provide complete answers to all the items on the applicant's
PAR	RT I	
A.	The <i>person(s)</i> or entity(ies) for whom this DRP is being filed is (a	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 full name First name, Middle name).	of the <i>control affiliate</i> below (for individuals, Last name,
	If the <i>control affiliate</i> is registered with the CRD, provide the CR	O number. If not, indicate "non-registered" by checking
_	the appropriate checkbox.	
	Name of Applicant	Applicant CRD Number
_	BD DRP – CONTROL AFFILIATE	
	CRD NUMBER	This Control Affiliate is [ ] Firm [ ] Individual
	Registered: [ ] Yes [ ] No	
	NAME (For individuals, Last, First, Middle)	
	1 This DDD should be removed from the DD record	possure the control offiliate(a) are no larger associated
	with the BD.	pecause the control affiliate(s) are no longer associated
B.	If the <i>control affiliate</i> is registered through the CRD, has the <i>con</i> DRP to the CRD System for the event? If the answer is "Yes," r	
	[ ] Yes [ ] No	

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

## REGULATORY ACTION DISCLOSURE REPORTING PAGE (BD)

(continuation)

Principal Sanction: (check appr	opriate item)					
[ ] Civil and Administrative Per [ ] Bar [ ] Cease and Desist [ ] Censure [ ] Denial Other Sanctions:	,	[ ] [ ] [ ]	Disgorgement Expulsion Injunction Prohibition Reprimand	[ ] [ ] [ ]	Restitution Revocation Suspensio Undertakir Other	า n
Date Initiated (MM/DD/YYYY)				[ ] Exac	t []	Explanation
If not exact, provide explanation	:					
Docket/Case Number:						
[ ] CD(s) [ ] Commodity Option(s)	appropriate item)  [ ] Derivative(s)  [ ] Direct Investme [ ] Equity - OTC [ ] Equity Listed (0 [ ] Futures - Communication of the comm	Commo nodity icial		erest(s) [ [ Stock) [ [ [	] Money ] Mutual ] No Prod ] Options ] Penny S ] Unit Inv	duct
Other Product Types:	[ ] modiumee				] Outer _	
Describe the allegations related	to this regulatory ac	tion. (	Γhe information	must fit wit	hin the spa	ce provided.):

## REGULATORY ACTION DISCLOSURE REPORTING PAGE (BD)

(continuation)

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

ettled ipulation and Consent
acated
[ ] Explanation
isgorgement/Restitution
ate and capacities affected , by exam/retraining was a cam required and whether gorgement or monetary ate, date paid and if any portion
clude relevant terms,
,

## **CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (BD)**

	GENERAL INSTRUCTIONS				
	This Disclosure Reporting Page [DRP (BD)] is an [ ] INITIAL <i>OR</i> [ ] AMENDED response to report details for affirmative responses to <i>Items 11H</i> of Form BD;				
	Check [√] item(s) being responded to:				
	11H(1) Has any domestic or foreign court:				
	<ul><li>[ ] (a) in the past ten years, enjoined the applicant or a control affiliate in connection with any investment-related activity?</li></ul>				
	[ ] (b) ever found that the applicant or a control affiliate was involved in a violation of investment-related statutes or regulations?				
	[ ] (c) ever dismissed, pursuant to a settlement agreement, an investment-related civil action brought against the applicant or a control affiliate by a state or foreign financial regulatory authority?				
	11H(2) [ ] Is the applicant or a control affiliate now the subject of any civil proceeding that could result in a "yes" answer to any part of 11H?				
	separate DRP for each event or <i>proceeding</i> . An event or <i>proceeding</i> may be reported for more than one person or entity using one File with a completed Execution Page.				
One e Unrela	vent may result in more than one affirmative answer to Items 11H. Use only one DRP to report details related to the same event.  ted civil judicial actions must be reported on separate DRPs.				
	ot a requirement that documents be provided for each event or proceeding. Should they be provided, they will not be accepted as sure in lieu of answering the questions on this DRP.				
applic.	ntrol affiliate is an individual or organization registered through the CRD, such control affiliate need only complete Part I of the ant'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 all affiliate is an individual or organization not registered through the CRD, provide complete answers to all the items on the applicant's priate DRP (BD). The completion of this DRP does not relieve the control affiliate of its obligation to update its CRD records.				
PAF	RT 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 <i>control affiliate</i> is registered with the CRD, provide the CRD number. If not, indicate "non-registered" by checking the appropriate checkbox.				
	Name of Applicant CRD Number				
ı	BD DRP – CONTROL AFFILIATE				
	CRD NUMBER This Control Affiliate is [ ] Firm [ ] Individual				
	Registered: [ ] Yes [ ] No				
	NAME (For individuals, Last, First, Middle)				
	[ ] This DRP should be removed from the BD record because the control affiliate(s) are no longer associated with the BD.				
B. If the <i>control affiliate</i> is registered through the CRD, has the <i>control affiliate</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.					
B.					

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

PA	RT II
1.	Court Action initiated by: (Name of regulator, foreign financial regulatory authority, SRO, commodities exchange, agency, firm, private plaintiff, etc.)
2.	Principal Relief Sought: (check appropriate item)  [ ] Cease and Desist
3.	Filing Date of Court Action (MM/DD/YYYY) [ ] Exact [ ] Explanation
	If not exact, provide explanation:
4.	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
	Other Product Types:
5.	Formal Action was brought in (include name of Federal, State or Foreign Court, Location of Court – City or County <u>and</u> State or Country, Docket/Case Number):
6.	Control Affiliate Employing Firm when activity occurred which led to the civil judicial action (if applicable):
7.	Describe the allegations related to this civil action. (The information must fit within the space provided.):
8.	Current Status? [ ] Pending [ ] On Appeal [ ] Final
9.	If on appeal, action action appealed to (provide name of court): Date Appeal Filed (MM/DD/YYYY):
10.	If pending, date notice/process was served (MM/DD/YYYY) [ ] [ ] Exact [ ] Explanation
	If not exact, provide explanation:

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

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.
How was matter resolved: (check appropriate item)
[ ] Consent [ ] Judgement Rendered [ ] Settled [ ] Opinion [ ] Withdrawn [ ] Other
Resolution Date (MM/DD/YYYY) [ ] Exact [ ] Explanation
If not exact, provide explanation:
Resolution Detail
A. Were any of the following Sanctions Ordered or Relief Granted? (Check all appropriate items):
[ ] Monetary/Fine
b. Other danctions.
C. Sanction Detail: If suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification, by exam/retraining was a condition of the sanction, provide length of time given to re-qualify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against applicant or control affiliate, date paid and if any portion of penalty was waived.
Provide a brief summary of details related to action(s), allegation(s), disposition(s), and/or finding(s) disclosed above. (The information must fit within the space provided.)
·

## **BANKRUPTCY / SIPC DISCLOSURE REPORTING PAGE (BD)**

	GENERAL INSTRUCTIONS
	This Disclosure Reporting Page [DRP (BD)] is an an [ ] INITIAL <i>OR</i> [ ] AMENDED response to report details for affirmative responses to <i>Questions 11I</i> on Form BD;
	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?
	separate DRP for each event or <i>proceeding</i> . An event or <i>proceeding</i> may be reported for more than one person or using one DRP. File with a completed Execution Page.
	ot a requirement that documents be provided for each event or <i>proceeding</i> . Should they be provided, they will not be sted as disclosure in lieu of answering the questions on this DRP.
of the (B) or answe	ontrol affiliate is an individual or organization registered through CRD, such control affiliate need only complete Part I applicant's appropriate DRP (BD). Details of the event must be submitted on the control affiliate's appropriate DRP DRP (U-4). If a control affiliate is an individual or organization not registered through the CRD, provide complete ers to all the items on the applicant's appropriate DRP (BD). The completion of this DRP does not relieve the control te of its obligation to update its CRD records.
PAR	RT I
A.	The person or entity for whom this DRP (BD) is being filed is:
	[ ] 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 full name of the <i>control affiliate</i> below (for individuals, Last name, First name, Middle name).
	If the <i>control affiliate</i> is registered with the CRD, provide the CRD number. If not, indicate "non-registered" by checking the appropriate checkbox.
	Name of Applicant CRD Number
	BD DRP – CONTROL AFFILIATE
	CRD NUMBER  This Control Affiliate is [ ] Firm [ ] Individual
	Registered: [ ] Yes [ ] No
	NAME (For individuals, Last, First, Middle)
	[ ] This DRP should be removed from the BD record because the control affiliate(s) are no longer associated with the BD.
B.	If the <i>control affiliate</i> is registered through the CRD, has the <i>control affiliate</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
PAR	RT II
1.	Action Type: (check appropriate item)
	[ ] Bankruptcy
2.	Action Date (MM/DD/YYYY) [ ] Exact [ ] Explanation
	If not exact, provide explanation:
	(continued)
	(**************************************

# BANKRUPTCY / SIPC DISCLOSURE REPORTING PAGE (BD) (continuation)

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

## **BOND DISCLOSURE REPORTING PAGE (BD)**

GENERAL INSTRUCTIONS					
This Disclosure Reporting Page (DRP BD) is an [ ] INITIAL <i>OR</i> [ ] AMENDED response used to report details for affirmative responses to <i>Item 11J</i> on Form BD;					
Chec	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 than one person or entity using one DRP. File with a completed Execution Page.  It is not a requirement that documents be provided for each event or <i>proceeding</i> . Should they be provided, they will not be accepted as disclosure in lieu of answering the questions on this DRP.					
Name	Name of Applicant:  Applicant CRD Number:				
1.	Firm Name: (Policy Holder)				
2.	Bonding Company Name:				
3.	Disposition Type: (check appropriate item) [ ] Denied				
4.	Disposition Date (MM/DD/YYYY):	[ ] Exact   [ ] Explanation			
	If not exact, provide explanation:				
5.	5. If disposition resulted in Payout, list Payout amount and Date Paid:				
6. Summarize the details of circumstances leading to necessity of the bonding company action: (The information mu within the space provided.)					
	-				
	l				
	<del></del>				

## JUDGMENT / LIEN DISCLOSURE REPORTING PAGE (BD)

GENERAL INSTRUCTIONS			
This Disclosure Reporting Page (DRP BD) is an [ ] INITIAL or [ ] AMENDED response used to report details for affirmative responses to <i>Item 11K</i> on Form BD;			
Check [√] item(s) being responded to:			
□ 11K Does the <i>applicant</i> have any unsatisfied judgements 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 they be provided they will not be accepted as disclosure in lieu of answering the questions on this DRP.			
Nam	ne of <i>Applicant</i> :	Applicant CRD Number:	
1.	Judgment/Lien Amount:		
2.	Judgment/Lien Holder:		
3.	Judgment/Lien Type: (check appropriate item [ ] Civil		
4.	Date Filed (MM/DD/YYYY): [ ] Exact [ ] Explanation		
	If not exact, provide explanation:		
5.	Is Judgment/Lien Outstanding? [ ] Yes [ ] No		
	If No, provide status date (MM/DD/YYYY): [ ] Exact	[ ] Explanation	
	If not exact, provide explanation:		
L	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 State or Country) and Docket/Case Number:		
7.	Provide a brief summary of events leading to the action and any payment schedule details including current status (if applicable). (The information must fit within the space provided.):		