

## BrokerCheck Report

### ORD MINNETT INC.

CRD# 10403

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

Please contact FINRA with any concerns.

## About BrokerCheck®



BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.

- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

- **Where did this information come from?**

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
  - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
  - information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

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Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at

[brokercheck.finra.org](http://brokercheck.finra.org)



For additional information about the contents of this report, please refer to the User Guidance or [www.finra.org/brokercheck](http://www.finra.org/brokercheck). It provides a glossary of terms and a list of frequently asked questions, as well as additional resources.

[For more information about FINRA, visit www.finra.org.](http://www.finra.org)



## ORD MINNETT INC.

CRD# 10403

SEC# 8-26889

### Main Office Location

320 PARK AVENUE  
12TH FLOOR  
NEW YORK, NY 10022

### Mailing Address

320 PARK AVENUE  
12TH FLOOR  
NEW YORK, NY 10022

### Business Telephone Number

212-508-3610

## Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

### Firm Profile

This firm is classified as a corporation.

This firm was formed in New York on 08/14/1981.

Its fiscal year ends in September.

### Firm History

Information relating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

### Firm Operations

This brokerage firm is no longer registered with FINRA or a national securities exchange.

### Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm? **Yes**

The following types of disclosures have been reported:

Type	Count
Regulatory Event	1

The number of disclosures from non-registered control affiliates is 4

## Registration Withdrawal Information

This section provides information relating to the date the brokerage firm ceased doing business and the firm's financial obligations to customers or other brokerage firms.



**Date firm ceased business:** 04/09/2001

**Does this brokerage firm owe any money or securities to any customer or brokerage firm?** No



## Firm Profile

This firm is classified as a corporation.

This firm was formed in New York on 08/14/1981.

Its fiscal year ends in September.

## Firm Names and Locations

This section provides the brokerage firm's full legal name, "Doing Business As" name, business and mailing addresses, telephone number, and any alternate name by which the firm conducts business and where such name is used.

### **ORD MINNETT INC.**

**Doing business as ORD MINNETT INC.**

**CRD#** 10403

**SEC#** 8-26889

### **Main Office Location**

320 PARK AVENUE  
12TH FLOOR  
NEW YORK, NY 10022

### **Mailing Address**

320 PARK AVENUE  
12TH FLOOR  
NEW YORK, NY 10022

### **Business Telephone Number**

212-508-3610



## Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

### Direct Owners and Executive Officers

**Legal Name & CRD# (if any):** ORD MINNETT GROUP LIMITED

**Is this a domestic or foreign entity or an individual?** Foreign Entity

**Position** SHAREHOLDER

**Position Start Date** 06/1993

**Percentage of Ownership** 75% or more

**Does this owner direct the management or policies of the firm?** Yes

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** EGAN, BRENDAN

**Is this a domestic or foreign entity or an individual?** Individual

**Position** CHAIRMAN OF THE BOARD

**Position Start Date** 08/1995

**Percentage of Ownership** Less than 5%

**Does this owner direct the management or policies of the firm?** Yes

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** HAYMAN, PETER JAMES  
1725683

**Is this a domestic or foreign entity or an individual?** Individual

**Position** DIRECTOR

**Position Start Date** 06/1993

**Percentage of Ownership** Less than 5%

## Firm Profile



### Direct Owners and Executive Officers (continued)

**Does this owner direct the management or policies of the firm?** Yes

**Is this a public reporting company?** No

**Legal Name & CRD# (if any):** HENDERSON, ANDREW WILLIAM  
1703913

**Is this a domestic or foreign entity or an individual?** Individual

**Position** PRESIDENT, VICE CHAIRMAN, DIRECTOR

**Position Start Date** 01/1996

**Percentage of Ownership** Less than 5%

**Does this owner direct the management or policies of the firm?** Yes

**Is this a public reporting company?** No

**Legal Name & CRD# (if any):** KIMMEL, LARRY ALAN  
269619

**Is this a domestic or foreign entity or an individual?** Individual

**Position** DIRECTOR

**Position Start Date** 03/1997

**Percentage of Ownership** Less than 5%

**Does this owner direct the management or policies of the firm?** Yes

**Is this a public reporting company?** No



## Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.

### Indirect Owners

<b>Legal Name &amp; CRD# (if any):</b>	JARDINE FLEMING ORD MINNETT PTY LIMITED
<b>Is this a domestic or foreign entity or an individual?</b>	Foreign Entity
<b>Company through which indirect ownership is established</b>	ORD MINNETT GROUP LIMITED
<b>Relationship to Direct Owner</b>	SHAREHOLDER
<b>Relationship Established</b>	06/1993
<b>Percentage of Ownership</b>	75% or more
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	THE CHASE MANHATTAN CORPORATION
<b>Is this a domestic or foreign entity or an individual?</b>	Domestic Entity
<b>Company through which indirect ownership is established</b>	ORD MINNETT GROUP LIMITED
<b>Relationship to Direct Owner</b>	STOCKHOLDER
<b>Relationship Established</b>	09/2000
<b>Percentage of Ownership</b>	75% or more
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	Yes

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<b>Legal Name &amp; CRD# (if any):</b>	ROBERT FLEMING HOLDINGS LTD
<b>Is this a domestic or foreign entity or an individual?</b>	Foreign Entity

## Firm Profile



### Indirect Owners (continued)

<b>Company through which indirect ownership is established</b>	JARDINE FLEMING
<b>Relationship to Direct Owner</b>	SHAREHOLDER
<b>Relationship Established</b>	03/1999
<b>Percentage of Ownership</b>	50% but less than 75%
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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## Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

No information reported.



## Firm Operations



### Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

**This firm is no longer registered.**

**The firm's registration was from 03/29/1982 to 05/17/2001.**

## Firm Operations



### Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

**This firm currently conducts 1 type of business.**

### Types of Business

Other - 10T THE REGISTRANT ACTS AS A BROKER OR DEALER IN UNITED STATES SECURITIES. THE REGISTRANT MAY IN THE FUTURE ACT AS A BROKER OR DEALER IN TRANSACTIONS INVOLVING SECURITIES TRADED ON THE AUSTRALIAN STOCK EXCHANGE.

### Other Types of Business

This firm does not effect transactions in commodities, commodity futures, or commodity options.

This firm does not engage in other non-securities business.

Non-Securities Business Description:

## Firm Operations



### Clearing Arrangements

This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

### Introducing Arrangements

This firm does refer or introduce customers to other brokers and dealers.

<b>Name:</b>	PERSHING DIVISION OF DONALDSON, LUFKIN & JENRETTE
<b>Business Address:</b>	ONE PERSHING PLAZA JERSEY CITY, NJ 07399
<b>Effective Date:</b>	01/01/1982
<b>Description:</b>	REGISTRANT HAS ENTERED INTO A FULLY DISCLOSED CLEARING AGREEMENT WITH THE PERSHING DIVISION OF DONALDSON, LUFKIN & JENRETTE SECURITIES CORPORATION.

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## Firm Operations

### Industry Arrangements



#### This firm does have books or records maintained by a third party.

**Name:** PERSHING DIVISION OF DONALDSON, LUFKIN & JENRETTE

**Business Address:** ONE PERSHING PLAZA  
JERSEY CITY, NJ 07399

**Effective Date:** 01/01/1982

**Description:** REGISTRANT HAS ENTERED INTO A FULLY DISCLOSED CLEARING AGREEMENT WITH THE PERSHING DIVISION OF DONALDSON, LUFKIN & JENRETTE SECURITIES CORPORATION.

#### This firm does have accounts, funds, or securities maintained by a third party.

**Name:** PERSHING DIVISION OF DONALDSON, LUFKIN & JENRETTE

**Business Address:** ONE PERSHING PLAZA  
JERSEY CITY, NJ 07399

**Effective Date:** 01/01/1982

**Description:** REGISTRANT HAS ENTERED INTO A FULLY DISCLOSED CLEARING AGREEMENT WITH THE PERSHING DIVISION OF DONALDSON, LUFKIN & JENRETTE SECURITIES CORPORATION.

#### This firm does have customer accounts, funds, or securities maintained by a third party.

**Name:** PERSHING DIVISION OF DONALDSON, LUFKIN & JENRETTE

**Business Address:** ONE PERSHING PLAZA  
JERSEY CITY, NJ 07399

**Effective Date:** 01/01/1982

**Description:** REGISTRANT HAS ENTERED INTO A FULLY DISCLOSED CLEARING AGREEMENT WITH THE PERSHING DIVISION OF DONALDSON, LUFKIN & JENRETTE SECURITIES CORPORATION.

#### Control Persons/Financing

**This firm does not have individuals who control its management or policies through agreement.**

**This firm does not have individuals who wholly or partly finance the firm's business.**



## Firm Operations

### Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

**This firm is, directly or indirectly:**

- in control of
  - controlled by
  - or under common control with
- the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.

**2CUBE.COM LIMITED is under common control with the firm.**

<b>Business Address:</b>	46F, JARDINE HOUSE CENTRAL HONG KONG, HONG KONG 99999
<b>Effective Date:</b>	09/05/2000
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	HONG KONG
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	CONTROL AFFILIATE

**AL-MEEZAN INVESTMENT AND FINANCIAL SERVICES (PRIVATE) LIMITED is under common control with the firm.**

<b>Business Address:</b>	2ND FLOOR, BAHRIA COMPLEX II KARACHI, PAKISTAN 74000
<b>Effective Date:</b>	09/05/2000
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	PAKISTAN
<b>Securities Activities:</b>	No
<b>Investment Advisory Activities:</b>	Yes
<b>Description:</b>	CONTROL AFFILIATE

**AL-MEEZAN MUTUAL FUND LIMITED is under common control with the firm.**

<b>Business Address:</b>	2ND FLOOR BAHRIA COMPLEX II KARACHI, PAKISTAN 74000
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## Firm Operations



### Organization Affiliates (continued)

**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** PAKISTAN  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

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#### **APEX UNIT TRUSTS BERHAD is under common control with the firm.**

**Business Address:** 3RD FLOOR, WISMA APEX 145A-C  
 SELANGOR, MALAYSIA 43000  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** MALAYSIA  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

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#### **AYUDHYA JARDINE FLEMING MASSET MANAGEMENT is under common control with the firm.**

**Business Address:** 8A FLOOR PLOENCHIT TOWER  
 BANGKOK, THAILAND 10330  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** THAILAND  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

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#### **BANCO CHASE MANHATTAN S.A. is under common control with the firm.**

**Business Address:** RUA VERBO DIVINO

## Firm Operations



### Organization Affiliates (continued)

SAO PAULO CEP, BRAZIL 04719-002

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** BRAZIL

**Securities Activities:** Yes

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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**BROWN & COMPANY SECURITIES CORPORATION is under common control with the firm.**

**CRD #:** 1326

**Business Address:** ONE BEACON STREET, 18TH FL  
BOSTON, MA 02108

**Effective Date:** 09/05/2000

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

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**C.T.A. BROKING SERVICES LIMITED is under common control with the firm.**

**Business Address:** LEVEL 6  
AUCKLAND, NEW ZEALAND 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** NEW ZEALAND

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

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**Firm Operations****Organization Affiliates (continued)**

**CHASE & M.D. SASS PARTNERS is under common control with the firm.**

**Business Address:** 1185 AVENUE OF THE AMERICAS  
NEW YORK, NY 10036

**Effective Date:** 09/05/2000

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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**CHASE ALTERNATIVE ASSET MANAGEMENT INC is under common control with the firm.**

**Business Address:** 1211 AVENUE OF THE AMERICAS  
NEW YORK, NY 10036

**Effective Date:** 09/05/2000

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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**CHASE ASSET MANAGEMENT (LONDON) LIMITED is under common control with the firm.**

**Business Address:** VINTNERS PLACE, 3RD FLOOR  
LONDON, ENGLAND EC4V3BJ

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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## Firm Operations



### Organization Affiliates (continued)

#### CHASE ASSET MANAGEMENT INC is under common control with the firm.

**Business Address:** 1211 AVENUE OF THE AMERICAS  
NEW YORK, NY 11036

**Effective Date:** 10/05/2000

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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#### CHASE BANK & TRUST CO (C.I.) LIMITED is under common control with the firm.

**Business Address:** CHASE HOUSE  
GRENVILLE STREET  
ST. HELIER, JERSEY, CHANNEL ISLANDS JE4 8HQ

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** JERSEY CHANNEL ISLANDS

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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#### CHASE DERIVATIVE STRATEGIES INC is under common control with the firm.

**Business Address:** 1211 AVENUE OF THE AMERICAS  
NEW YORK, NY 10017

**Effective Date:** 09/05/2000

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Description:** CONTROL AFFILIATE

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**CHASE FLEMING ASSET MANAGEMENT (UK) LTD. is under common control with the firm.**

**Business Address:** 25 COPTHALL AVENUE  
LONDON, ENGLAND EC2R 7DR

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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**CHASE FUTURES & OPTIONS, INC. is under common control with the firm.**

**Business Address:** 10 SOUTH LA SALLE STREET  
CHICAGO, IL 60603

**Effective Date:** 09/05/2000

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

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**CHASE INVESTMENT (PANAMA) SA is under common control with the firm.**

**Business Address:** EDIFICO PLAZA CHASE  
PANAMA CITY, REPUBLIC OF PANAMA 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** PANAMA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

## Firm Operations



### Organization Affiliates (continued)

**Description:** CONTROL AFFILIATE

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**CHASE FUTURES & OPTIONS, INC. is under common control with the firm.**

**Business Address:** 10 SOUTH LA SALLE STREET  
CHICAGO, IL 60603

**Effective Date:** 09/05/2000

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

**CHASE INVESTMENT (PANAMA) SA is under common control with the firm.**

**Business Address:** EDIFICO PLAZA CHASE  
PANAMA CITY, REPUBLIC OF PANAMA 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** PANAMA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

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**CHASE INVESTMENT SERVICES CORP. is under common control with the firm.**

**CRD #:** 25574

**Business Address:** 55 WATER STREET  
NEW YORK, NY 10041-0199

**Effective Date:** 09/05/2000

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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#### **CHASE MANHATTAN (SEA) LIMITED is under common control with the firm.**

**Business Address:** 150 BEACH ROAD  
SINGAPORE, SINGAPORE 189720

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** SINGAPORE

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

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#### **CHASE MANHATTAN ASIA LIMITED is under common control with the firm.**

**Business Address:** 39F ONE EXCHANGE SQUARE  
CENTRAL HONG KONG, HONG KONG 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** HONG KONG

**Securities Activities:** Yes

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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#### **CHASE MANHATTAN BANK AND TURST COMPANY NATIONAL ASSOCIATION is under common control with the firm.**

**Business Address:** 1800 CENTURY PARK EAST  
LOS ANGELES, CA 90067

**Effective Date:** 09/05/2000

**Foreign Entity:** No

**Country:**

## Firm Operations



### Organization Affiliates (continued)

**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

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#### CHASE MANHATTAN BANK CMB, S.A. is under common control with the firm.

**Business Address:** GRAN VIA 17  
BILBAO, SPAIN  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** SPAIN  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

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#### CHASE MANHATTAN BANK INTERNATIONAL is under common control with the firm.

**Business Address:** 23, 1ST TVERSKAYA  
MOSCOW, RUSSIA 125047  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** RUSSIA  
**Securities Activities:** Yes  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

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#### CHASE MANHATTAN BANK MEXICO, S.A. is under common control with the firm.

**Business Address:** PROL. PASEO DE LA REFORMA 600  
MEXICO CITY, MEXICO 01210  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** MEXICO

## Firm Operations



### Organization Affiliates (continued)

**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

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#### CHASE MANHATTAN BANK VENEZUELA, C.A. is under common control with the firm.

**Business Address:** CENTRO CREMERCA  
 CARACAS, VENEZUELA 99999  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** VENEZUELA  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

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#### CHASE MANHATTAN INTERNATIONAL LIMITED is under common control with the firm.

**Business Address:** 125 LONDON WALL  
 LONDON, ENGLAND EC2Y 5AJ  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** ENGLAND  
**Securities Activities:** Yes  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

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#### CHASE MANHATTAN MENKUL DEGERLER A.S. is under common control with the firm.

**Business Address:** EMIRHAN CADDESI  
 DIKILITAS, ISTANBUL, TURKEY 80700  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Country:** TURKEY  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

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#### CHASE MANHATTAN PRIVATE BANK, NATIONAL ASSOCIATION is under common control with the firm.

**Business Address:** 4915 INDEPENDENCE PARKWAY  
TAMPA, FL 33634  
**Effective Date:** 09/05/2000  
**Foreign Entity:** No  
**Country:**  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

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#### CHASE MANHATTAN S.A. DISTRIBUION DE TITULOS E VALORES MOBILIARIO is under common control with the firm.

**Business Address:** RUA VERBO DIVINO  
SAO PAULO, BRAZIL 04719-002  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** BRAZIL  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

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#### CHASE MANHATTAN TRADING S.A. SOCIEDAD DE BOLSA is under common control with the firm.

**Business Address:** CALLE ARENALES 707  
BUENOS AIRES 1061, ARGENTINA 99999  
**Effective Date:** 09/05/2000

**Firm Operations****Organization Affiliates (continued)**

**Foreign Entity:** Yes  
**Country:** ARGENTINA  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

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**CHASE MANHATTAN TRUST CAYMAN LTD. is under common control with the firm.**

**Business Address:** PO BOX N-3708  
 BAHAMAS FINANCIAL CENTRE  
 NASSAU, BAHAMAS 99999  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** CAYMAN ISLANDS, BWI  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

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**CHASE MANHATTAN TRUST COMPANY (HONG KONG) LTD. is under common control with the firm.**

**Business Address:** 41/F ONE EXCHANGE SQUARE  
 CENTRAL HONG KONG, HONG KONG 99999  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** HONG KONG  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

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**CHASE MANHATTAN TRUST COMPANY, NATIONAL ASSOCIATION is under common control with the firm.**

**Business Address:** UNION TRUST BUILDING  
 PITTSBURGH, PA 15219

## Firm Operations



### Organization Affiliates (continued)

**Effective Date:** 09/05/2000  
**Foreign Entity:** No  
**Country:**  
**Securities Activities:** Yes  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

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**CHASE MANHATTAN VALORES, SOCIEDAD DE VALORES Y BOLSA, S.A. is under common control with the firm.**

**Business Address:** PASEO DE LA CASTELIANA  
MADRID, SPAIN 28046  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** SPAIN  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

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**CHASE SECURITIES AUSTRALIA LIMITED is under common control with the firm.**

**Business Address:** LEVEL 35 AAP CENTRE  
SYDNEY, AUSTRALIA NSW 2000  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** AUSTRALIA  
**Securities Activities:** Yes  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

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**CHASE SECURITIES CANADA INC is under common control with the firm.**

**Business Address:** 1 FIRST CANADIAN PLACE

## Firm Operations



### Organization Affiliates (continued)

TORONTO, CANADA M5X 1A4

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** CANADA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

#### CHASE SECURITIES INC. is under common control with the firm.

**CRD #:** 18718

**Business Address:** 270 PARK AVENUE  
NEW YORK, NY 10017

**Effective Date:** 09/05/2000

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

#### CHASE SECURITIES JAPAN LIMITED is under common control with the firm.

**Business Address:** 5-2-20 AKASAKA  
TOKYO, JAPAN 107-6111

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** CAYMAN ISLAND, BWI

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

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**Firm Operations****Organization Affiliates (continued)****CHASE SECURITIES OF TEXAS, INC. is under common control with the firm.**

**CRD #:** 17116

**Business Address:** 707 TRAVIS  
HOUSTON, TN 77002

**Effective Date:** 09/05/2000

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**CHASE TRUST BANK is under common control with the firm.**

**Business Address:** AKASAKA PARK BUILDING  
TOYKO, JAPAN 107-6113

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** JAPAN

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**CHASE VALORES, C.A. is under common control with the firm.**

**Business Address:** CENTRO FEDERAL AV, VENEZUELA  
CARACAS, VENEZUELA 1010-A

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** VENEZUELA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Firm Operations****Organization Affiliates (continued)**

**Description:** CONTROL AFFILIATE

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**CHASEMELLON FINANCIAL SERVICES L.L.C. is under common control with the firm.**

**CRD #:** 47268

**Business Address:** 85 CHALLENGER ROAD  
RIDGEFIELD PARK, NJ 07660

**Effective Date:** 09/05/2000

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory  
Activities:** No

**Description:** CONTROL AFFILIATE

---

**DESANTIS CAPITAL MANAGEMENT LP is under common control with the firm.**

**Business Address:** ONE BUSH STREET  
SAN FRANCISCO, CA 94104

**Effective Date:** 09/05/2000

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory  
Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**EMERGING MARKETS SELECT MANAGEMENT COMPANY SA is under common control with the firm.**

**Business Address:** EUROPEAN BANK & BUSINESS CENTRE  
SENNINGERBERG, LUXEMBOURG L02633

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** LUXEMBOURG

**Securities Activities:** No

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

#### **EQUIMARK (JERSEY) LIMITED is under common control with the firm.**

**Business Address:** 28 NEW STREET  
ST. HELIER, ISLE OF JERSEY 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** JERSEY

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

#### **EXCHANGE CAPITAL CORPORATION is under common control with the firm.**

**Business Address:** 3RD FLOOR  
CORPORATEBUSINESS CENTRE  
MAKATI METRO MANILA, PHILIPPINES 1200

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** PHILIPPINES

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

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#### **FLEDGELING NOMINEES INTERNATIONAL LIMITED is under common control with the firm.**

**Business Address:** 16 MADAME CANA ROAD  
MUMBAI, INDIA 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** CAYMAN ISLANDS

## Firm Operations



### Organization Affiliates (continued)

<b>Securities Activities:</b>	No
<b>Investment Advisory Activities:</b>	Yes
<b>Description:</b>	CONTROL AFFILIATE

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#### **FLEMING (FCP) FUND SERIES MANAGEMENT COMPANY S.A. is under common control with the firm.**

<b>Business Address:</b>	EUROPEAN BANK & BUSINESS CENTRE SENNINGERBERG, LUXEMBOURG L-2633
<b>Effective Date:</b>	09/05/2000
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	LUXEMBOURG
<b>Securities Activities:</b>	No
<b>Investment Advisory Activities:</b>	Yes
<b>Description:</b>	CONTROL AFFILIATE

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#### **FLEMING (JERSEY) LIMITED is under common control with the firm.**

<b>Business Address:</b>	28 NEW STREET ST. HELIER, ISLE OF JERSEY 99999
<b>Effective Date:</b>	09/05/2000
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	JERSEY
<b>Securities Activities:</b>	No
<b>Investment Advisory Activities:</b>	Yes
<b>Description:</b>	CONTROL AFFILIATE

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#### **FLEMING (JERSEY) TRUSTEES LIMITED is under common control with the firm.**

<b>Business Address:</b>	28 NEW STREET ST. HELIER, ISLE OF JERSEY 99999
<b>Effective Date:</b>	09/05/2000
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	JERSEY

## Firm Operations



### Organization Affiliates (continued)

**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

---

#### **FLEMING AL MANSOUR SECURITIES is under common control with the firm.**

**Business Address:** 9 MOHAMED FAHMY STREET  
CAIRO, EGYPT 99999  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** EGYPT  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

---

#### **FLEMING ASSET MANAGEMENT (CANADA) INC is under common control with the firm.**

**Business Address:** 100 YONGE STREET  
ONTARIO, CANADA M5C 2W1  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** CANADA  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

---

#### **FLEMING ASSET MANAGEMENT SOUTH AFRICA is under common control with the firm.**

**Business Address:** THE JOHANNESBURG STOCK EXCHANGE  
JOHANNESBURG, SOUTH AFRICA 2000  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes

**Firm Operations****Organization Affiliates (continued)**

**Country:** SOUTH AFRICA  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

---

**FLEMING ASSET MANAGEMENT ZIMBABWE (PRIVATE) LIMITED is under common control with the firm.**

**Business Address:** GROUND FLOOR  
 CLUB CHAMBERS  
 HARARE, ZIMBABWE  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** ZIMBABWE  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

---

**FLEMING CIIC ASSET MANAGEMENT is under common control with the firm.**

**Business Address:** 9 MOHAMMED FAHMY STREET  
 CAIRO, EGYPT 99999  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** EGYPT  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

---

**FLEMING CIIC SECURITIES is under common control with the firm.**

**Business Address:** 9 MOHAMED FAHMY STREET  
 CAIRO, EGYPT 99999  
**Effective Date:** 09/05/2000

## Firm Operations



### Organization Affiliates (continued)

**Foreign Entity:** Yes  
**Country:** EGYPT  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

---

**FLEMING EUROPEAN ASSET MANAGEMENT DISTRIBUTION COMPANY, S.A. is under common control with the firm.**

**Business Address:** EUROPEAN BANK & BUSINESS CENTRE  
 SENNINGERBERG, LUXEMBOURG 99999  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** LUXEMBOURG  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

---

**FLEMING FINANCE SA is under common control with the firm.**

**Business Address:** 40 RUE WASHINGTON  
 BP 252 08  
 PARIS, FRANCE 99999  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** FRANCE  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

---

**FLEMING FLAGSHIP ADVISORY CO SA is under common control with the firm.**

**Business Address:** EUROPEAN BANK & BUSINESS CENTRE

## Firm Operations



### Organization Affiliates (continued)

SENNINGERBERG, LUXEMBOURG

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** LUXEMBOURG

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

#### ROBERT FLEMING INC is under common control with the firm.

**Business Address:** 320 PARK AVENUE  
NEW YORK, NY 10022

**Effective Date:** 09/05/2000

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

#### FLEMING FUND MANAGEMENT (LUXEMBOURG) SA is under common control with the firm.

**Business Address:** EUROPEAN BANK & BUSINESS CENTRE  
SENNINGERBERG, LUXEMBOURG

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** LUXEMBOURG

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

#### FLEMING GESTION FRANCE SA is under common control with the firm.

**Firm Operations****Organization Affiliates (continued)**

**Business Address:** 39-41 RUE CAMBON  
PARIS, FRANCE 75001

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** FRANCE

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**FLEMING GRAPHUC ASSET MANAGEMENT SA is under common control with the firm.**

**Business Address:** AV ALMIRANTE BARROSO  
RIO DE JANEIRO, BRAZIL

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** BRAZIL

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**FLEMING GUTA ASSET MANAGEMENT COMPANY is under common control with the firm.**

**Business Address:** 6TH FLOOR, ROMANOV PER 4  
MOSCOW, RUSSIA 103875

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** RUSSIA

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**FLEMING INTERNATIONAL FUND MARKETING LIMITED is under common control with the firm.**

**Firm Operations****Organization Affiliates (continued)**

**Business Address:** 25 COPTHALL AVENUE  
LONDON, ENGLAND EC2R 7DR

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**FLEMING INVESTISSEMENT SA is under common control with the firm.**

**Business Address:** 39-41 RUE CAMBON  
PARIS, FRANCE

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** FRANCE

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**FLEMING INVESTMENT TRUST SERVICES LIMITED is under common control with the firm.**

**Business Address:** 25 COPTHALL AVENUE  
LONDON, ENGLAND EC2R 7DR

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

## Firm Operations



### Organization Affiliates (continued)

**FLEMING ISLE OF MAN LIMITED is under common control with the firm.**

**Business Address:** 5 MOUNT PLEASANT  
DOUGLAS, ISLE OF MAN 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ISLE OF MAN

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

**FLEMING LIFE LIMITED is under common control with the firm.**

**Business Address:** 25 COPTHALL AVENUE  
LONDON, ENGLAND EC2R 7DR

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**FLEMING MARTIN EDWARDS SECURITIES (PRIVATE) LIMITED is under common control with the firm.**

**Business Address:** ERNST & YOUNG  
HARARE, ZIMBABWE 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ZIMBABWE

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

## Firm Operations



### Organization Affiliates (continued)

**FLEMING MARTIN SECURITIES LIMITED is under common control with the firm.**

**Business Address:** 1016 THE STOCK EXCHANGE  
JOHANNESBURG, SOUTH AFRICA 2001

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** SOUTH AFRICA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

**FLEMING PRIVATE ASSET MANAGEMENT LIMITED is under common control with the firm.**

**Business Address:** 25 COPTHALL AVENUE  
LONDON, ENGLAND EC2R 7DR

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**FLEMING PRIVATE ASSET MANAGEMENT SOUTH AFRICA LIMITED is under common control with the firm.**

**Business Address:** THE JOHANNESBURG STOCK EXCHANGE  
JOHANNESBURG, SOUTH AFRICA 2000

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** SOUTH AFRICA

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

## Firm Operations



### Organization Affiliates (continued)

**FLEMING PRIVATE FUND MANAGEMENT LIMITED is under common control with the firm.**

<b>Business Address:</b>	25 COPTHALL AVENUE LONDON, ENGLAND EC2R 7DR
<b>Effective Date:</b>	09/05/2000
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	ENGLAND
<b>Securities Activities:</b>	No
<b>Investment Advisory Activities:</b>	Yes
<b>Description:</b>	CONTROL AFFILIATE

**FLEMING SELECTION SA is under common control with the firm.**

<b>Business Address:</b>	39-41 RUE CAMBON PARIS, FRANCE 75001
<b>Effective Date:</b>	09/05/2000
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	FRANCE
<b>Securities Activities:</b>	No
<b>Investment Advisory Activities:</b>	Yes
<b>Description:</b>	CONTROL AFFILIATE

**FLEMING UCB ZAO is under common control with the firm.**

<b>Business Address:</b>	6TH FLOOR, ROMANOV PER 4 MOSCOW, RUSSIA 103875
<b>Effective Date:</b>	09/05/2000
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	RUSSIA
<b>Securities Activities:</b>	No
<b>Investment Advisory Activities:</b>	Yes

**Firm Operations****Organization Affiliates (continued)**

**Description:** CONTROL AFFILIATE

---

**FLEMING UNIT TRUST MANAGEMENT COMPANY SA LIMITED is under common control with the firm.**

**Business Address:** THE JOHANNESBURG STOCK EXCHANGE  
JOHANNESBURG, SOUTH AFRICA 2000

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** SOUTH AFRICA

**Securities Activities:** No

**Investment Advisory  
Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**FLEMING UNIT TRUST MANAGEMENT LIMITED is under common control with the firm.**

**Business Address:** 25 COPTHALL AVENUE  
LONDON, ENGLAND EC2R 7DR

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** No

**Investment Advisory  
Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**FLEMING-FONDS MARKETING GMBH is under common control with the firm.**

**Business Address:** IM TRUTZ FRANKFURT  
FRANKFURT, GERMANY 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** GERMANY

**Securities Activities:** No

**Investment Advisory  
Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Description:** CONTROL AFFILIATE

---

**FLEMINGS (FCP) MANAGEMENT LIMITED is under common control with the firm.**

**Business Address:** EUROPEAN BANK & BUSINESS CENTRE  
SENNINGERBERG, LUXEMBOURG L-2633

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** LUXEMBOURG

**Securities Activities:** No

**Investment Advisory  
Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**FLEMINGS GRAPHUS S.A. is under common control with the firm.**

**Business Address:** AVENIDA ALMIRANTE BARROSO  
RIO DE JANIERO, BRAZIL 20031-000

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** BRAZIL

**Securities Activities:** Yes

**Investment Advisory  
Activities:** No

**Description:** CONTROL AFFILIATE

---

**FLEMING NEDERLAND BV is under common control with the firm.**

**Business Address:** ATRIUM BUILDING  
AMSTERDAM, NEDERLAND 1077 ZX

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** NETHERLANDS

**Securities Activities:** No

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**GENERAL BROKERAGE LIMITED is under common control with the firm.**

**Business Address:** 3RD FLOOR  
ROGERS HOUSE  
PORT LOUIS, MAURITIUS 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** MAURITIUS

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

**H&Q VENTURE MANAGEMENT LLC is under common control with the firm.**

**Business Address:** ONE BUSH STREET  
SAN FRANCISCO, CA 94104

**Effective Date:** 09/05/2000

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**HAMBRECHT & QUIST CAPITAL MANAGEMENT INC is under common control with the firm.**

**Business Address:** 50 ROWES WHARF  
BOSTON, MA 02110-3328

**Effective Date:** 09/05/2000

**Foreign Entity:** No

**Country:**

## Firm Operations



### Organization Affiliates (continued)

**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

---

#### **HAMBRECHT & QUIST FUND MANAGEMENT LLC is under common control with the firm.**

**Business Address:** ONE BUST STREET  
SAN FRANCISCO, CA 94104  
**Effective Date:** 09/05/2000  
**Foreign Entity:** No  
**Country:**  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

---

#### **JARDINE FLEMING (CHINA) INVESTMENT SERVICES LIMITED is under common control with the firm.**

**Business Address:** 1 JIAGGUOMENWAL AVENUE  
CHAOYANG DISTRICT  
BEIJING, CHINA 10004  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** HONG KONG  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATES

---

#### **JARDINE FLEMING APEX FUTURES SDN. BHD. is under common control with the firm.**

**Business Address:** 3RD FLOOR, WISMA APEX 145A-C  
SELANGOR DARUL EHSAN, MALAYSIA 99999  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Country:** MALAYSIA  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

---

#### JARDINE FLEMING APEX SECURITIES BERHAD is under common control with the firm.

**Business Address:** 3RD FLOOR, WISMA APEX, 145A-C  
 SELANGOR DARUL EHSAN, MALAYSIA 43000  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** MALAYSIA  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

---

#### JARDINE FLEMING AUSTRALIA MANAGEMENT LIMITED is under common control with the firm.

**Business Address:** 600 BOURKE STREET  
 MELBOURNE, AUSTRALIA VIC 3000  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** AUSTRALIA  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

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#### JARDINE FLEMING BROKING LIMITED is under common control with the firm.

**Business Address:** 46/F JARDINE HOUSE  
 CENTRAL HONG KONG, HONG KONG 99999  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes

**Firm Operations****Organization Affiliates (continued)**

**Country:** HONG KONG  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

---

**JARDINE FLEMING EXCHANGE CAPITAL GROUP INC. is under common control with the firm.**

**Business Address:** 3RD FLOOR  
 CORPORATE BUSINESS CENTRE  
 MAKATI METRO MANILA, PHILIPPINES 1200  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** PHILIPPINES  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

---

**JARDINE FLEMING EXCHANGE CAPITAL SECURITIES INC is under common control with the firm.**

**Business Address:** 2/F, CORPORATE BUSINESS CENTRE  
 METRO MANILA, PHILIPPINES 99999  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** PHILIPPINES  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

---

**JARDINE FLEMING FUTURES (KOREA) LIMITED is under common control with the firm.**

**Business Address:** 12 TH FLOOR, TS CORP  
 BUILDING 7,23  
 SEOUL, KOREA 99999

**Firm Operations****Organization Affiliates (continued)**

**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** KOREA  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

---

**JARDINE FLEMING FUTURES LIMITED is under common control with the firm.**

**Business Address:** 46TH FLOOR, JARDINE HOUSE  
CENTRAL HONG KONG, HONG KONG 99999  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** HONG KONG  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

---

**JARDINE FLEMING HNB SECURITIES (PRIVATE) LIMITED is under common control with the firm.**

**Business Address:** 10-01 EAST TOWER  
WORLD TRADE CENTRE  
COLOMBO, SRI LANKA 99999  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** SRI LANKA  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

---

**JARDINE FLEMING INDIA ASSET MANAGEMENT LTD is under common control with the firm.**

**Business Address:** 16 MADAME CAMA ROAD

## Firm Operations



### Organization Affiliates (continued)

MUMBAI, INDIA 400 021

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** INDIA

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

#### JARDINE FLEMING INDIA BROKING LIMITED is under common control with the firm.

**Business Address:** AMERSHAND MANSION  
MUMBAI, INDIA

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** INDIA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

#### JARDINE FLEMING INDIA SECURITIES LIMITED is under common control with the firm.

**Business Address:** AMERSHAND MANSION  
MUMBAI, INDIA 400001

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** INDIA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

#### JARDINE FLEMING INTERNATIONAL MANAGEMENT INC is under common control with the firm.

**Firm Operations****Organization Affiliates (continued)**

**Business Address:** 1 CONNAUGHT PLACE  
HONG KONG, HONG KONG

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** BRITISH VIRGIN ISLANDS

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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**JARDINE FLEMING INTERNATIONAL MANAGEMENT INC. is under common control with the firm.**

**Business Address:** 16 MADAME CANA ROAD  
MUMBAI, INDIA 400021

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** BRITISH VIRGIN ISLANDS

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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**JARDINE FLEMING INVESTMENT MANAGEMENT (SINGAPORE) LTD is under common control with the firm.**

**Business Address:** 9 RAFFLES ROAD  
SINGAPORE, SINGAPORE 048619

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** SINGAPORE

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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**JARDINE FLEMING INVESTMENT MANAGEMENT INTERNATIONAL LIMITED is under common control with the**

**Firm Operations****Organization Affiliates (continued)**

firm.

**Business Address:** 1 CONNAUGH PLACE  
HONG KONG, HONG KONG 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** BRITISH VIRGIN ISLANDS

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**JARDINE FLEMING INVESTMENT MANAGEMENT LIMITED is under common control with the firm.**

**Business Address:** 110 SOKONG-DONG  
SEOUL, KOREA 100-070

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** HONG KONG

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**JARDINE FLEMING INVESTMENT MANAGEMENT LIMITED is under common control with the firm.**

**Business Address:** 1 CONNAUGHT PLACE  
HONG KONG, HONG KONG 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** HONG KONG

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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## Firm Operations



### Organization Affiliates (continued)

**JARDINE FLEMING INVESTMENT TRSUT AND ADVISORY COMPANY LIMITED is under common control with the firm.**

**Business Address:** YAMATO SEIMEI BUILDING  
TOKYO, JAPAN 100-0011

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** JAPAN

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**JARDINE FLEMING MUTUAL FUND LTD. is under common control with the firm.**

**Business Address:** 16 MADAME CAMA ROAD  
MUMBAI, INDIA 400 021

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** INDIA

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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**JARDINE FLEMING PAKISTAN (PVT) LIMITED is under common control with the firm.**

**Business Address:** 2ND FLOOR, BAHRIA COMPLEX II  
KARACHI, PAKISTAN 74000

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** PAKISTAN

**Securities Activities:** No

**Investment Advisory Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Description:** CONTROL AFFILIATE

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**JARDINE FLEMING PAKISTAN BROKER (PRIVATE) LIMITED is under common control with the firm.**

**Business Address:** 2ND FLOOR, BAHRIA COMPLEX II  
KARACHI, PAKISTAN, PAKISTAN 74000

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** PAKISTAN

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

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**JARDINE FLEMING PRIVATE INVESTMENTS LIMITED is under common control with the firm.**

**Business Address:** 1 CONNAUGHT PLACE  
HONG KONG, HONG KONG 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** HONG KONG

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**JARDINE FLEMING SECURITIES (ASIA) LIMITED is under common control with the firm.**

**Business Address:** YAMATO SEIMEI BUILDING, 1-1-7  
CHIYODA-KU, TOYKO

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** TOYKO

**Securities Activities:** Yes

**Investment Advisory Activities:** No

## Firm Operations



### Organization Affiliates (continued)

**Description:** CONTROL AFFILIATE

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**JARDINE FLEMING SECURITIES LIMITED is under common control with the firm.**

**Business Address:** 34-35, 43-47/F JARDINE HOUSE  
CENTRAL HONG KONG, HONG KONG 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** HONG KONG

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

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**JARDINE FLEMING SINGAPORE SECURITIES PTE LTD is under common control with the firm.**

**Business Address:** 9 RAFFLES PLACE  
SINGAPORE, SINGAPORE 048619

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** SINGAPORE

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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**JARDINE FLEMING TAIWAN INVESTMENT MANAGEMENT LIMITED is under common control with the firm.**

**Business Address:** 17F 67 TUN HWA SOUTH ROAD  
TAIPEI, TAIWAN 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** TAIWAN

**Securities Activities:** No

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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**JARDINE FLEMING TAIWAN SECURITIES LIMITED is under common control with the firm.**

**Business Address:** 17TH FLOOR  
67 TUN HWA SOUTH ROAD  
TAIPEI, TAIWAN 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** TAIWAN

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

**JARDINE FLEMING THANAKOM SECURITIES LIMITED is under common control with the firm.**

**Business Address:** 29TH FLOOR  
SILOM COMPLEX OFFICE BUILDING  
BANGKOK, THAILAND 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** THAILAND

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

**JARDINE FLEMING UNIT TRUST LIMITED is under common control with the firm.**

**Business Address:** 1 CONNAUGHT PLACE  
HONG KONG, HONG KONG 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Country:** HONG KONG  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

---

#### JF CHINA MANAGEMENT LIMITED is under common control with the firm.

**Business Address:** 1 CONNAUGHT PLACE  
HONG KONG, HONG KONG 99999  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** HONG KONG  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

---

#### JFIM (KOREA) LIMITED is under common control with the firm.

**Business Address:** 110 SOKONG-DONG  
CHUNG-KU  
SEOUL, KOREA 100-070  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** HONG KONG  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTOL AFFILIATE

---

#### ORD MINNETT CORPORATE FINANCE LIMITED is under common control with the firm.

**Business Address:** L26, GROSVENOR PLACE  
SYDNEY, AUSTRALIA 99999  
**Effective Date:** 06/05/1987

## Firm Operations



### Organization Affiliates (continued)

**Foreign Entity:** Yes  
**Country:** AUSTRALIA  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

---

#### ORD MINNETT FIXED INTEREST LIMITED is under common control with the firm.

**Business Address:** L14, CITY TOWER  
 WELLINGTON, NEW ZEALAND 99999  
**Effective Date:** 06/28/1994  
**Foreign Entity:** Yes  
**Country:** NEW ZEALAND  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

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#### ORD MINNETT INVESTMENT PLANNING (HONG KONG) LIMITED is under common control with the firm.

**Business Address:** 5/F WING ON CENTRE  
 CENTRAL HONG KONG, HONG KONG 99999  
**Effective Date:** 10/08/1999  
**Foreign Entity:** Yes  
**Country:** HONG KONG  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

---

#### ORD MINNETT INVESTMENT PLANNING PTY LIMITED is under common control with the firm.

**Business Address:** L26, GROSVENOR PLACE  
 SYDNEY, AUSTRALIA  
**Effective Date:** 09/16/1994

## Firm Operations



### Organization Affiliates (continued)

**Foreign Entity:** Yes  
**Country:** AUSTRALIA  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

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#### ORD MINNETT JARDINE FLEMING FUTURES LIMITED is under common control with the firm.

**Business Address:** L26, GROSVENOR PLACE  
 SYDNEY, AUSTRALIA 99999  
**Effective Date:** 12/27/1978  
**Foreign Entity:** Yes  
**Country:** AUSTRALIA  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

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#### ORD MINNETT JARDINE FLEMING FUTURES-NZ-LIMITED is under common control with the firm.

**Business Address:** L14, CITY TOWER  
 WELLINGTON, NEW ZEALND 99999  
**Effective Date:** 05/11/1987  
**Foreign Entity:** Yes  
**Country:** NEW ZEALAND  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

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#### ORD MINNETT LIMITED is under common control with the firm.

**Business Address:** 25 COPTHALL AVENUE  
 LONDON, ENGLAND EC2R 7DD

## Firm Operations



### Organization Affiliates (continued)

**Effective Date:** 03/12/1984  
**Foreign Entity:** Yes  
**Country:** ENGLAND  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

---

#### ORD MINNETT LIMITED is under common control with the firm.

**Business Address:** L26, GROSVENOR PLACE  
 SYDNEY, AUSTRALIA 99999  
**Effective Date:** 03/12/1984  
**Foreign Entity:** Yes  
**Country:** SYDNEY  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATES

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#### ORD MINNETT MANAGEMENT LIMITED is under common control with the firm.

**Business Address:** 225 GEORGE STREET  
 SYDNEY, AUSTRALIA NSW 2000  
**Effective Date:** 09/23/1981  
**Foreign Entity:** Yes  
**Country:** AUSTRALIA  
**Securities Activities:** No  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

---

#### ORD MINNETT SECURITIES LIMITED is under common control with the firm.

**Business Address:** L26, GROSVENOR PLACE  
 SYDNEY, AUSTRALIA 99999

## Firm Operations



### Organization Affiliates (continued)

**Effective Date:** 02/27/1987  
**Foreign Entity:** Yes  
**Country:** AUSTRALIA  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** NTROL AFFILIATE

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#### ORD MINNETT SECURITIES-NZ-LIMITED is under common control with the firm.

**Business Address:** L14, CITY TOWER  
 WELLINGTON, NEW ZEALAND 99999  
**Effective Date:** 09/25/1986  
**Foreign Entity:** Yes  
**Country:** NEW ZEALAND  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

---

#### ORD MINNETT-NZ-LIMITED is under common control with the firm.

**Business Address:** L14, CITY TOWER  
 WELLINGTON, NEW ZEALAND 99999  
**Effective Date:** 09/25/1986  
**Foreign Entity:** Yes  
**Country:** NEW ZEALAND  
**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

---

#### P.T. JARDINE FLEMING NUSANTARA is under common control with the firm.

**Business Address:** 17TH FLOOR WORLD TRADE CENTRE

## Firm Operations



### Organization Affiliates (continued)

JAKARTA, INDONESIA 12920

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** INDONESIA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

#### **PATERSON ORD MINNETT LIMITED is under common control with the firm.**

**Business Address:** L23, EXCHANGE PLAZA  
PERTH, AUSTRALIA

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** AUSTRALIA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

#### **ROBERT FLEMING & CO LIMITED FRANKFURT BRANCH is under common control with the firm.**

**Business Address:** 1M TRUTZ  
FRANKFURT, GERMANY 60322

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** GERMANY

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

#### **ROBERT FLEMING & CO LIMITED is under common control with the firm.**

## Firm Operations



### Organization Affiliates (continued)

**Business Address:** RIO DE LA PLATA #30  
COLONIA CUAHTEMOC, MEXICO DF 06500

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

#### **ROBERT FLEMING & CO LTD. LUXEMBOURG BRANCH is under common control with the firm.**

**Business Address:** 6 ROUTE DE TREVES  
SENNINGBERG, LUXEMBOURG

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** LUXEMBOURG

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

#### **ROBERT FLEMING (BAHRAIN) WLL is under common control with the firm.**

**Business Address:** P.O. BOX 2467, 10TH FLOOR  
MANAMA, BAHRAIN 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** BAHRAIN

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

#### **ROBERT FLEMING (CIS) S.A. is under common control with the firm.**

## Firm Operations



### Organization Affiliates (continued)

**Business Address:** EUROPEAN BANK & BUSINESS CENTRE  
SENNINGERBERG, LUXEMBOURG 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** LUXEMBOURG

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

#### ROBERT FLEMING (FRANCE) SA is under common control with the firm.

**Business Address:** WASHINGTON PLAZA  
40 RUE WASHINGTON  
PARIS, FRANCE

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** FRANCE

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

#### ROBERT FLEMING (JERSEY) LIMITED is under common control with the firm.

**Business Address:** 28 NEW STREET  
ST. HELIER, ISLE OF JERSEY 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** JERSEY

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

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## Firm Operations



### Organization Affiliates (continued)

**ROBERT FLEMING (POLSKA) SA is under common control with the firm.**

<b>Business Address:</b>	ATRIUM BUILDING WARSHAW, AL 00-854
<b>Effective Date:</b>	09/05/2000
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	POLAND
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	CONTROL AFFILIATE

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**ROBERT FLEMING (SWITZERLAND) AG is under common control with the firm.**

<b>Business Address:</b>	1 RUE ETIENNE DUMONT CASE POSTALE 3192 GENEVA, SWITZERLAND
<b>Effective Date:</b>	09/05/2000
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	SWITZERLAND
<b>Securities Activities:</b>	No
<b>Investment Advisory Activities:</b>	Yes
<b>Description:</b>	CONTROL AFFILIATE

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**ROBERT FLEMING HOLDINGS INC. is under common control with the firm.**

<b>Business Address:</b>	25 COPTHALL AVENUE LONDON, ENGLAND EC2R 7DR
<b>Effective Date:</b>	09/05/2000
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	ENGLAND
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No

## Firm Operations



### Organization Affiliates (continued)

**Description:** CONTROL AFFILIATE

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**ROBERT FLEMING INVESTMENT MANAGEMENT (JERSEY) LIMITED is under common control with the firm.**

**Business Address:** 28 NEW STREET  
ST. HELIER, ISLE OF JERSEY 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** JERSEY

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**ROBERT FLEMING MANAGEMENT (JERSEY) LIMITED is under common control with the firm.**

**Business Address:** 28 NEW STREET  
ST. HELIER, ISLE OF JERSEY 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** JERSEY

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**ROBERT FLEMING SIM SPA is under common control with the firm.**

**Business Address:** VIA A MANZONI 12  
MILAN, ITALY 20121

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ITALY

**Securities Activities:** Yes

**Investment Advisory Activities:** No

## Firm Operations



### Organization Affiliates (continued)

**Description:** CONTROL AFFILIATE

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**ROBERT FLEMING SPAIN AV SA is under common control with the firm.**

**Business Address:** PASEO DE LA CASTYELLANA  
MADRID, SPAIN

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** SPAIN

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**SAVE & PROSPER EQUITY PLAN MANAGERS is under common control with the firm.**

**Business Address:** 20 FINSBURY STREET  
LONDON, ENGLAND

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

**SAVE & PROSPER GROUP LIMITED is under common control with the firm.**

**Business Address:** 20 FINSBURY STREET  
LONDON, ENGLAND EC2Y 9AQ

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

#### **SAVE & PROSPER INSURANCE LIMITED is under common control with the firm.**

**Business Address:** 20 FINSBURY STREET  
LONDON, ENGLAND EC2Y 9AQ

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

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#### **SAVE & PROSPER PENSIONS LIMITED is under common control with the firm.**

**Business Address:** 20 FINSBURY STREET  
LONDON, ENGLAND

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

---

#### **SAVE & PROSPER SECURITIES LIMITED is under common control with the firm.**

**Business Address:** 20 FINSBURY STREET  
LONDON, ENGLAND

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** CONTROL AFFILIATE

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**SIM CO. GE F SPA is under common control with the firm.**

**Business Address:** VIA NAPO TORRIANI 31  
MILAN, ITALY

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ITALY

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**STOCKBROKERS BOTSWANA LIMITED is under common control with the firm.**

**Business Address:** 1ST FLOOR, DEBSWANA HOUSE  
GABORONE, BOTSWANA 99999

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** BOTSWANA

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** CONTROL AFFILIATE

---

**T. ROWE PRICE FLEMING ASSET MANAGEMENT LIMITED is under common control with the firm.**

**Business Address:** 20 FINSBURY STREET  
LONDON, ENGLAND EC2Y 9AQ

**Effective Date:** 09/05/2000

**Foreign Entity:** Yes

**Country:** ENGLAND

## Firm Operations



### Organization Affiliates (continued)

**Securities Activities:** Yes  
**Investment Advisory Activities:** No  
**Description:** CONTROL AFFILIATE

---

#### THE CHASE MANHATTAN BANK is under common control with the firm.

**Business Address:** 270 PARK AVENUE  
 NEW YORK, NY 10017  
**Effective Date:** 09/05/2000  
**Foreign Entity:** No  
**Country:**  
**Securities Activities:** Yes  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

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#### THE CHASE MANHATTAN PRIVATE BANK (SWITZERLAND) is under common control with the firm.

**Business Address:** 63 RUE DE RHONE  
 GENEVA, SWITZERLAND  
**Effective Date:** 09/05/2000  
**Foreign Entity:** Yes  
**Country:** SWITZERLAND  
**Securities Activities:** Yes  
**Investment Advisory Activities:** Yes  
**Description:** CONTROL AFFILIATE

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#### ORD MINNETT GROUP LIMITED controls the firm.

**Business Address:** 225 GEORGE STREET  
 LEVEL 26  
 SYDNEY, AUSTRALIA NSW2000  
**Effective Date:** 06/01/1993  
**Foreign Entity:** Yes

## Firm Operations



### Organization Affiliates (continued)

<b>Country:</b>	AUSTRALIA
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	RESISTRANT IS WHOLLY OWNED BY ORD MINNETT GROUP LIMITED (THE PARENT) OF SYDNEY, AUSTRALIA, WHICH IS ULTIMATELY OWNED BY JARDINE FLEMING ORD MINNETT PTY LIMITED. THE PRINCIPAL BUSINESS ACTIVITY IS ACTING AS A BROKER OF AUSTRALIAN AND NEW ZEALAND SECURITIES.THE COMPANY ALSO INTRODUCES U.S. EQUITY TRANSACTIONS TO A CLEARING BROKER ON A FULLY DISCLOSED BASIS.

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**This firm is not directly or indirectly, controlled by the following:**

- bank holding company
- national bank
- state member bank of the Federal Reserve System
- state non-member bank
- savings bank or association
- credit union
- or foreign bank



## Disclosure Events

All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	<b>Pending</b>	<b>Final</b>	<b>On Appeal</b>
Regulatory Event	0	1	0

## Disclosure Event Details

### What you should know about reported disclosure events:

1. **BrokerCheck provides details for any disclosure event that was reported in CRD. It also includes summary information regarding FINRA arbitration awards in cases where the brokerage firm was named as a respondent.**
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
  - A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
3. **Disclosure events in BrokerCheck reports come from different sources:**
  - Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
4. **There are different statuses and dispositions for disclosure events:**
  - A disclosure event may have a status of *pending*, *on appeal*, or *final*.
    - A "pending" event involves allegations that have not been proven or formally adjudicated.
    - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
    - A "final" event has been concluded and its resolution is not subject to change.
  - A final event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
    - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
    - A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
    - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
5. **You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.**

### Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

#### Disclosure 1 of 1

**Reporting Source:** Firm  
**Current Status:** Final



**Allegations:** IN AUGUST 1996 FIM, FITM, AND S&P ALL INVESTMENT ADVISORY AFFILIATES OF ORD, WERE EACH FINED 100,000 (ENGLISH POUNDS) BY IMRO FOR BREACHES OF CERTAIN SEC AND INV. BOARD (SIB) PRINCIPLES AND IMRO RULES RELATING TO THE FAILURE OF FIM, FITM, AND S&P TO SUPERVISE AN INVESTMENT MANAGEMENT DELEGATE, HONG KONG BASED JARDINE FLEMING INVESTMENT MANAGEMENT LIMITED (JFIM), IN RESPECT TO ENSURING ADEQUATE DEALING AND COMPLIANCE SYSTEMS AND PROCEDURES, FAILING TO TAKE ACTION WHEN THEY LEARNED OF WEAKNESSES, FAILING TO DISCLOSE THAT CERTAIN COMMISSIONS DISCLOSED TO CUSTOMERS WERE RETAINED BY AN ASSOCIATED BROKER AND FAILING TO INFORM IMRO THAT INVESTMENT BUSINESS HAD BEEN DELEGATED TO A FIRM WHICH HAD DEALING AND COMPLIANCE PROCEDURES WHICH DID NOT MEET IMRO'S STANDARDS, AS A RESULT OF THE SAME INVESTIGATION, HONG KONG BASED JARDINE FLEMING ASSET MANAGEMENT LIMITED (JFAM), WAS ALSO FINED 400,000 (ENGLISH POUNDS) BY IMRO FOR SIMILAR BREACHES OF SIB PRINCIPLES AND IMRO RULES, PARTICULARLY IN RELATION TO THE FAILURE OF JFAM TO SUPERVISE AN INVESTMENT MANAGEMENT DELEGATE, JFIM. IN ADDITION, JFAM ACCEPTED THE TERMINATION OF ITS AUTHORIZATION WITH IMRO. IN A RELATED INVESTIGATION, JFIM, AN INVESTMENT ADVISORY OF ORD, WAS PUBLICLY REPRIMANDED BY THE HONG KONG SECURITIES AND FUTURES COMMISSION (SFC) FOR BREACHES OF THE CODE OF CONDUCT FOR PERSONS REGISTERED WITH THE SFC. THE BREACHES RELATED TO JFIM'S INADEQUATE AND INEFFECTIVE INTERNAL CONTROLS AND COMPLIANCE MONITORING. JFIM ALSO AGREED WITH THE SEC WITHOUT ADMITTING LIABILITY, TO MAKE VOLUNTARY PAYMENTS TOTALING APPROXIMATELY US \$19.1 MILLION TO COMPENSATE THREE CLIENTS WHICH WERE CONSIDERED BY THE SFC TO HAVE BEEN DISADVANTAGED BY THE LATE ALLOCATION OF DEALS BY ONE FUND MANAGER OF JFIM AFTER CHANGES IN THE PRICE OF THE INSTRUMENTS TRADED HAD OCCURRED. THE SFC REVOKED, FOR MISCONDUCT, THE REGISTRATION OF THE RESPONSIBLE FUND MANAGER AT JFIM AS AN INVESTMENT ADVISER, SECURITIES DEALER AND COMMODITIES TRADING ADVISOR

**Initiated By:** IMRO (UK), HONG KONG SECURITIES & FUTURES COMMISSIONS ("SFC")

**Date Initiated:** 08/01/1996

**Docket/Case Number:**

**Principal Product Type:** Other

**Other Product Type(s):** FOREIGN EXCHANGE LISTED EQUITY SECURITY

**Principal Sanction(s)/Relief Sought:**



**Other Sanction(s)/Relief Sought:**

**Resolution:** Settled  
**Resolution Date:** 08/01/1996  
**Sanctions Ordered:** Monetary/Fine \$780,250.31  
**Other Sanctions Ordered:**

**Sanction Details:** FLEMING INVESTMENT MANAGEMENT LIMITED, FLEMING INVESTMENT TRUST MANAGEMENT LIMITED AND SAVE & PROSPER SECURITIES LIMITED, ALL INVESTMENT ADVISORY AFFILIATES OF ORD WERE EACH FINED 100,000 (BRITISH POUNDS) AND JARDINE FLEMING ASSET MANAGEMENT LIMITED, AN INVESTMENT ADVISORY AFFILIATE OF ORD WAS FINED 400,000 (BRITISH POUNDS)

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** IN AUGUST 1996 FIM, FITM, AND S&P ALL INVESTMENT ADVISORY AFFILIATES OF ORD, WERE EACH FINED 100,000 (ENGLISH POUNDS) BY IMRO FOR BREACHES OF CERTAIN SEC AND INV. BOARD (SIB) PRINCIPLES AND IMRO RULES RELATING TO THE FAILURE OF FIM, FITM, AND S&P TO SUPERVISE AN INVESTMENT MANAGEMENT DELEGATE, HONG KONG BASED JARDINE FLEMING INVESTMENT MANAGEMENT LIMITED (JFIM), IN RESPECT TO ENSURING ADEQUATE DEALING AND COMPLIANCE SYSTEMS AND PROCEDURES, FAILING TO TAKE ACTION WHEN THEY LEARNED OF WEAKNESSES, FAILING TO DISCLOSE THAT CERTAIN COMMISSIONS DISCLOSED TO CUSTOMERS WERE RETAINED BY AN ASSOCIATED BROKER AND FAILING TO INFORM IMRO THAT INVESTMENT BUSINESS HAD BEEN DELEGATED TO A FIRM WHICH HAD DEALING AND COMPLIANCE PROCEDURES WHICH DID NOT MEET IMRO'S STANDARD'S, AS A RESULT OF THE SAME INVESTIGATION, HONG KONG BASED JARDINE FLEMING ASSET MANAGEMENT LIMITED (JFAM), WAS ALSO FINED 400,000 (ENGLISH POUNDS) BY IMRO FOR SIMILAR BREACHES OF SIB PRINCIPLES AND IMRO RULES, PARTICULARLY IN RELATION TO THE FAILURE OF JFAM TO SUPERVISE AN INVESTMENT MANAGEMENT DELEGATE, JFIM. IN ADDITION, JFAM ACCEPTED THE TERMINATION OF ITS AUTHORIZATION WITH IMRO. IN A RELATED INVESTIGATION, JFIM, AN INVESTMENT ADVISORY OF ORD, WAS PUBLICLY REPRIMANDED BY THE HONG KONG SECURITIES AND FUTURES COMMISSION (SFC) FOR BREACHES OF THE CODE OF CONDUCT FOR PERSONS REGISTERED WITH THE SFC. THE BREACHES RELATED TO JFIM'S INADEQUATE AND INEFFECTIVE INTERNAL CONTROLS AND COMPLIANCE MONITORING. JFIM ALSO AGREED WITH THE SEC WITHOUT



ADMITTING LIABILITY, TO MAKE VOLUNTARY PAYMENTS TOTALING APPROXIMATELY US \$19.1 MILLION TO COMPENSATE THREE CLIENTS WHICH WERE CONSIDERED BY THE SFC TO HAVE BEEN DISADVANTAGED BY THE LATE ALLOCATION OF DEALS BY ONE FUND MANAGER OF JFIM AFTER CHANGES IN THE PRICE OF THE INSTRUMENTS TRADED HAD OCCURRED. THE SFC REVOKED, FOR MISCONDUCT, THE REGISTRATION OF THE RESPONSIBLE FUND MANAGER AT JFIM AS AN INVESTMENT ADVISER, SECURITIES DEALER AND COMMODITIES TRADING ADVISOR

**Initiated By:** IMRO (UK), HONG KONG SECURITIES & FUTURES COMMISSIONS ("SFC")

**Date Initiated:** 08/01/1996

**Docket/Case Number:**

**Principal Product Type:** Other

**Other Product Type(s):** FOREIGN EXCHANGE LISTED EQUITY SECURITY

**Principal Sanction(s)/Relief Sought:**

**Other Sanction(s)/Relief Sought:**

**Resolution:** Settled

**Resolution Date:** 08/01/1996

**Sanctions Ordered:** Monetary/Fine \$780,250.31

**Other Sanctions Ordered:**

**Sanction Details:** FLEMING INVESTMENT MANAGEMENT LIMITED, FLEMING INVESTMENT TRUST MANAGEMENT LIMITED AND SAVE & PROSPER SECURITIES LIMITED, ALL INVESTMENT ADVISORY AFFILIATES OF ORD WERE EACH FINED 100,000 (BRITISH POUNDS) AND JARDINE FLEMING ASSET MANAGEMENT LIMITED, AN INVESTMENT ADVISORY AFFILIATE OF ORD WAS FINED 400,000 (BRITISH POUNDS)

**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** IN AUGUST 1996 FIM, FITM, AND S&P ALL INVESTMENT ADVISORY AFFILIATES OF ORD, WERE EACH FINED 100,000 (ENGLISH POUNDS) BY IMRO FOR BREACHES OF CERTAIN SEC AND INV. BOARD (SIB) PRINCIPLES AND IMRO RULES RELATING TO THE FAILURE OF FIM, FITM, AND S&P TO SUPERVISE AN INVESTMENT MANAGEMENT DELEGATE, HONG KONG BASED JARDINE FLEMING INVESTMENT MANAGEMENT LIMITED (JFIM), IN



RESPECT TO ENSURING ADEQUATE DEALING AND COMPLIANCE SYSTEMS AND PROCEDURES, FAILING TO TAKE ACTION WHEN THEY LEARNED OF WEAKNESSES, FAILING TO DISCLOSE THAT CERTAIN COMMISSIONS DISCLOSED TO CUSTOMERS WERE RETAINED BY AN ASSOCIATED BROKER AND FAILING TO INFORM IMRO THAT INVESTMENT BUSINESS HAD BEEN DELEGATED TO A FIRM WHICH HAD DEALING AND COMPLIANCE PROCEDURES WHICH DID NOT MEET IMRO'S STANDARD'S, AS A RESULT OF THE SAME INVESTIGATION, HONG KONG BASED JARDINE FLEMING ASSET MANAGEMENT LIMITED (JFAM), WAS ALSO FINED 400,000 (ENGLISH POUNDS) BY IMRO FOR SIMILAR BREACHES OF SIB PRINCIPLES AND IMRO RULES, PARTICULARLY IN RELATION TO THE FAILURE OF JFAM TO SUPERVISE AN INVESTMENT MANAGEMENT DELEGATE, JFIM. IN ADDITION, JFAM ACCEPTED THE TERMINATION OF ITS AUTHORIZATION WITH IMRO. IN A RELATED INVESTIGATION, JFIM, AN INVESTMENT ADVISORY OF ORD, WAS PUBLICLY REPRIMANDED BY THE HONG KONG SECURITIES AND FUTURES COMMISSION(SFC) FOR BREACHES OF THE CODE OF CONDUCT FOR PERSONS REGISTERED WITH THE SFC. THE BREACHES RELATED TO JFIM'S INADEQUATE AND INEFFECTIVE INTERNAL CONTROLS AND COMPLIANCE MONITORING. JFIM ALSO AGREED WITH THE SEC WITHOUT ADMITTING LIABILITY, TO MAKE VOLUNTARY PAYMENTS TOTALING APPROXIMATELY US \$19.1 MILLION TO COMPENSATE THREE CLIENTS WHICH WERE CONSIDERED BY THE SFC TO HAVE BEEN DISADVANTAGED BY THE LATE ALLOCATION OF DEALS BY ONE FUND MANAGER OF JFIM AFTER CHANGES IN THE PRICE OF THE INSTRUMENTS TRADED HAD OCCURRED. THE SFC REVOKED, FOR MISCONDUCT, THE REGISTRATION OF THE RESPONSIBLE FUND MANAGER AT JFIM AS AN INVESTMENT ADVISER, SECURITIES DEALER AND COMMODITIES TRADING ADVISOR

**Initiated By:** IMRO (UK), HONG KONG SECURITIES & FUTURES COMMISSIONS ("SFC")

**Date Initiated:** 08/01/1996

**Docket/Case Number:**

**Principal Product Type:** Other

**Other Product Type(s):** FOREIGN EXCHANGE LISTED EQUITY SECURITY

**Principal Sanction(s)/Relief Sought:**

**Other Sanction(s)/Relief Sought:**

**Resolution:** Settled

**Resolution Date:** 08/01/1996

**Sanctions Ordered:** Monetary/Fine \$780,250.31



## Other Sanctions Ordered:

### Sanction Details:

FLEMING INVESTMENT MANAGEMENT LIMITED, FLEMING INVESTMENT TRUST MANAGEMENT LIMITED AND SAVE & PROSPER SECURITIES LIMITED, ALL INVESTMENT ADVISORY AFFILIATES OF ORD WERE EACH FINED 100,000 (BRITISH POUNDS) AND JARDINE FLEMING ASSET MANAGEMENT LIMITED, AN INVESTMENT ADVISORY AFFILIATE OF ORD WAS FINED 400,000 (BRITISH POUNDS)

### Reporting Source:

Firm

### Current Status:

Final

### Allegations:

IN AUGUST 1996 FIM, FITM, AND S&P ALL INVESTMENT ADVISORY AFFILIATES OF ORD, WERE EACH FINED 100,000 (ENGLISH POUNDS) BY IMRO FOR BREACHES OF CERTAIN SEC AND INV. BOARD (SIB) PRINCIPLES AND IMRO RULES RELATING TO THE FAILURE OF FIM, FITM, AND S&P TO SUPERVISE AN INVESTMENT MANAGEMENT DELEGATE, HONG KONG BASED JARDINE FLEMING INVESTMENT MANAGEMENT LIMITED (JFIM), IN RESPECT TO ENSURING ADEQUATE DEALING AND COMPLIANCE SYSTEMS AND PROCEDURES, FAILING TO TAKE ACTION WHEN THEY LEARNED OF WEAKNESSES, FAILING TO DISCLOSE THAT CERTAIN COMMISSIONS DISCLOSED TO CUSTOMERS WERE RETAINED BY AN ASSOCIATED BROKER AND FAILING TO INFORM IMRO THAT INVESTMENT BUSINESS HAD BEEN DELEGATED TO A FIRM WHICH HAD DEALING AND COMPLIANCE PROCEDURES WHICH DID NOT MEET IMRO'S STANDARDS, AS A RESULT OF THE SAME INVESTIGATION, HONG KONG BASED JARDINE FLEMING ASSET MANAGEMENT LIMITED (JFAM), WAS ALSO FINED 400,000 (ENGLISH POUNDS) BY IMRO FOR SIMILAR BREACHES OF SIB PRINCIPLES AND IMRO RULES, PARTICULARLY IN RELATION TO THE FAILURE OF JFAM TO SUPERVISE AN INVESTMENT MANAGEMENT DELEGATE, JFIM. IN ADDITION, JFAM ACCEPTED THE TERMINATION OF ITS AUTHORIZATION WITH IMRO. IN A RELATED INVESTIGATION, JFIM, AN INVESTMENT ADVISORY OF ORD, WAS PUBLICLY REPRIMANDED BY THE HONG KONG SECURITIES AND FUTURES COMMISSION (SFC) FOR BREACHES OF THE CODE OF CONDUCT FOR PERSONS REGISTERED WITH THE SFC. THE BREACHES RELATED TO JFIM'S INADEQUATE AND INEFFECTIVE INTERNAL CONTROLS AND COMPLIANCE MONITORING. JFIM ALSO AGREED WITH THE SEC WITHOUT ADMITTING LIABILITY, TO MAKE VOLUNTARY PAYMENTS TOTALING APPROXIMATELY US \$19.1 MILLION TO COMPENSATE THREE CLIENTS WHICH WERE CONSIDERED BY THE SFC TO HAVE BEEN DISADVANTAGED BY THE LATE ALLOCATION OF DEALS BY ONE FUND MANAGER OF JFIM AFTER CHANGES IN THE PRICE OF THE INSTRUMENTS TRADED HAD OCCURRED. THE SFC REVOKED, FOR MISCONDUCT, THE REGISTRATION OF THE RESPONSIBLE FUND MANAGER AT JFIM AS AN INVESTMENT



ADVISER, SECURITIES DEALER AND COMMODITIES TRADING ADVISOR  
 IMRO (UK), HONG KONG SECURITIES & FUTURES COMMISSIONS ("SFC")

**Initiated By:****Date Initiated:**

08/01/1996

**Docket/Case Number:****Principal Product Type:**

Other

**Other Product Type(s):**

FOREIGN EXCHANGE LISTED EQUITY SECURITY

**Principal Sanction(s)/Relief Sought:****Other Sanction(s)/Relief Sought:****Resolution:**

Settled

**Resolution Date:**

08/01/1996

**Sanctions Ordered:**

Monetary/Fine \$780,250.31

**Other Sanctions Ordered:****Sanction Details:**

FLEMING INVESTMENT MANAGEMENT LIMITED, FLEMING INVESTMENT TRUST MANAGEMENT LIMITED AND SAVE & PROSPER SECURITIES LIMITED, ALL INVESTMENT ADVISORY AFFILIATES OF ORD WERE EACH FINED 100,000 (BRITISH POUNDS) AND JARDINE FLEMING ASSET MANAGEMENT LIMITED, AN INVESTMENT ADVISORY AFFILIATE OF ORD WAS FINED 400,000 (BRITISH POUNDS)

**Reporting Source:**

Firm

**Current Status:**

Final

**Allegations:**

IN AUGUST 1996 FIM, FITM, AND S&P ALL INVESTMENT ADVISORY AFFILIATES OF ORD, WERE EACH FINED 100,000 (ENGLISH POUNDS) BY IMRO FOR BREACHES OF CERTAIN SEC AND INV. BOARD (SIB) PRINCIPLES AND IMRO RULES RELATING TO THE FAILURE OF FIM, FITM, AND S&P TO SUPERVISE AN INVESTMENT MANAGEMENT DELEGATE, HONG KONG BASED JARDINE FLEMING INVESTMENT MANAGEMENT LIMITED (JFIM), IN RESPECT TO ENSURING ADEQUATE DEALING AND COMPLIANCE SYSTEMS AND PROCEDURES, FAILING TO TAKE ACTION WHEN THEY LEARNED OF WEAKNESSES, FAILING TO DISCLOSE THAT CERTAIN COMMISSIONS DISCLOSED TO CUSTOMERS WERE RETAINED BY AN ASSOCIATED BROKER AND FAILING TO INFORM IMRO THAT INVESTMENT BUSINESS HAD BEEN DELEGATED TO A FIRM WHICH HAD DEALING AND COMPLIANCE PROCEDURES WHICH DID NOT MEET IMRO'S STANDARD'S, AS A RESULT



OF THE SAME INVESTIGATION, HONG KONG BASED JARDINE FLEMING ASSET MANAGEMENT LIMITED (JFAM), WAS ALSO FINED 400,000 (ENGLISH POUNDS) BY IMRO FOR SIMILAR BREACHES OF SIB PRINCIPLES AND IMRO RULES, PARTICULARLY IN RELATION TO THE FAILURE OF JFAM TO SUPERVISE AN INVESTMENT MANAGEMENT DELEGATE, JFIM. IN ADDITION, JFAM ACCEPTED THE TERMINATION OF ITS AUTHORIZATION WITH IMRO. IN A RELATED INVESTIGATION, JFIM, AN INVESTMENT ADVISORY OF ORD, WAS PUBLICLY REPRIMANDED BY THE HONG KONG SECURITIES AND FUTURES COMMISSION(SFC) FOR BREACHES OF THE CODE OF CONDUCT FOR PERSONS REGISTERED WITH THE SFC. THE BREACHES RELATED TO JFIM'S INADEQUATE AND INEFFECTIVE INTERNAL CONTROLS AND COMPLIANCE MONITORING. JFIM ALSO AGREED WITH THE SEC WITHOUT ADMITTING LIABILITY, TO MAKE VOLUNTARY PAYMENTS TOTALING APPROXIMATELY US \$19.1 MILLION TO COMPENSATE THREE CLIENTS WHICH WERE CONSIDERED BY THE SFC TO HAVE BEEN DISADVANTAGED BY THE LATE ALLOCATION OF DEALS BY ONE FUND MANAGER OF JFIM AFTER CHANGES IN THE PRICE OF THE INSTRUMENTS TRADED HAD OCCURRED. THE SFC REVOKED, FOR MISCONDUCT, THE REGISTRATION OF THE RESPONSIBLE FUND MANAGER AT JFIM AS AN INVESTMENT ADVISER, SECURITIES DEALER AND COMMODITIES TRADING ADVISOR

**Initiated By:** IMRO (UK), HONG KONG SECURITIES & FUTURES COMMISSIONS ("SFC")

**Date Initiated:** 08/01/1996

**Docket/Case Number:**

**Principal Product Type:** Other

**Other Product Type(s):** FOREIGN EXCHANGE LISTED EQUITY SECURITY

**Principal Sanction(s)/Relief Sought:**

**Other Sanction(s)/Relief Sought:**

**Resolution:** Settled

**Resolution Date:** 08/01/1996

**Sanctions Ordered:** Monetary/Fine \$780,250.31

**Other Sanctions Ordered:**

**Sanction Details:** FLEMING INVESTMENT MANAGEMENT LIMITED, FLEMING INVESTMENT TRUST MANAGEMENT LIMITED AND SAVE & PROSPER SECURITIES LIMITED, ALL INVESTMENT ADVISORY AFFILIATES OF ORD WERE EACH FINED 100,000 (BRITISH POUNDS) AND JARDINE FLEMING ASSET MANAGEMENT LIMITED, AN INVESTMENT ADVISORY AFFILIATE OF ORD



WAS FINED 400,000 (BRITISH POUNDS)



## Disclosure Events for Non-Registered Control Affiliates

All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	<b>Pending</b>	<b>Final</b>	<b>On Appeal</b>
Regulatory Event	0	4	0

## Disclosure Event Details

### Regulatory - Final

#### Disclosure 1 of 4

<b>Reporting Source:</b>	Firm
<b>Affiliate:</b>	THE PORTFOLIO GROUP, INC.
<b>Current Status:</b>	Final
<b>Allegations:</b>	UPON ATTEMPT TO FILE INITIAL REGISTRATION WITH MARYLAND, IT WAS DETERMINED THAT THE PORTFOLIO GROUP, INC. SHOULD HAVE PREVIOUSLY REGISTERED AND THIS WAS IN VIOLATION OF MARYLAND REGISTRATION REQUIREMENTS.
<b>Initiated By:</b>	MARYLAND SECURITIES COMMISSIONER
<b>Date Initiated:</b>	02/01/1993
<b>Docket/Case Number:</b>	1A93-0825
<b>Principal Product Type:</b>	No Product
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Civil and Administrative Penalt(ies) /Fine(s)
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Consent
<b>Resolution Date:</b>	07/01/1993
<b>Sanctions Ordered:</b>	Monetary/Fine \$1,500.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, THE PORTFOLIO GROUP, INC. CONSENTED TO: (1) COMPLY WITH MARYLAND SECURITIES LAW; AND (2) PAY COSTS OF \$1500.00 REGISTRATION BECAME EFFECTIVE AT THE TIME OF THE ORDER.

#### Disclosure 2 of 4

<b>Reporting Source:</b>	Firm
<b>Affiliate:</b>	THE CHASE MANHATTAN BANK, N.A.
<b>Current Status:</b>	Final



<b>Allegations:</b>	CMB IN ITS FUNCTION AS TRANSFER AGENT FROM 1982AND 1989 FAILED TO PROPERLY VERIFY WHETHER TWO OUTSIDE VENDORS HAD PROPERLY DESTROYED CANCELLED REGISTERED CORPORATE BOND CERTIFICATES DELIVERED TO THEM BY CMB.
<b>Initiated By:</b>	OFFICE OF THE COMPTROLLER OF CURRENCY AND THE SEC
<b>Date Initiated:</b>	08/01/1994
<b>Docket/Case Number:</b>	N/A
<b>Principal Product Type:</b>	No Product
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Civil and Administrative Penalt(ies) /Fine(s)
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Settled
<b>Resolution Date:</b>	09/30/1994
<b>Sanctions Ordered:</b>	Monetary/Fine \$1,000,000.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	CMB PAID A CIVIL PENALTY OF \$100,000, AGREED TO CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATION OF 17A OF THE EXCHANGE ACT AND RULE 17AD-12 THEREUNDER AND TO ADOPT AND MAINTAIN POLICIES AND PROCEDURES TO PREVENT REOCCURANCE OF THE CONDUCT. WITHOUT ADMITTING OR DENYING THE MATTER SET FORTH IN THE PROCEEDING, CMB SUBMITTED AN OFFER OF SETTLEMENT AND CONSENTED TO THE ENTRY OF A JOINT ORDER AND FINDING THAT ITS PRACTICES, POLICIES AND PRODCURES WITH REGARD TO THE CANCELLATION AND DESTRUCTION OF CERTIFICATES WERE INADEQUATE, IN VIOLATION OF SECTION 17A OF THE EXCHANGE ACT AND RULE 17AD-12 THEREUNDER.

#### Disclosure 3 of 4

<b>Reporting Source:</b>	Firm
<b>Affiliate:</b>	FLEMING INVESTMENT TRUST MANAGEMENT LIMITED
<b>Current Status:</b>	Final
<b>Allegations:</b>	IN AUGUST 1996 FIM, FITM AND S&P ALL INVESTMENT ADVISORY

AFFILIATES OF ROBERT FLEMING INC, WERE EACH FINED 100,000 (ENGLISH POUNDS) BY IMRO FOR BREACHES OF CERTAIN SEC AND INV. BOARD (SIB) PRINCIPALES AND IMRO RULES RELATING TO THE FAILURE OF FIM, FITM AND S&P TO SUPERVISE AN INVESMTNEMENT MANAGEMENT DELEGATE, HONG KONG BASED JARDINE FLEMING INVESTMENT MANAGEMENT LIMITED (JFIM), IN RESPECT TO ENSURING ADEQUATE DEALING AND COMPLIANCE SYSTEMS AND PROCEDURES, FAILING TO TAKE ACTION WHEN THEY LEARNED OF WEAKNESSES, FAILING TO DISCLOSE THAT CERTAIN COMMISSIONS DISCLOSED TO CUSTOMERS WERE RETAINED BY AN ASSOCIATED BROKER AND FAILING TO INFORM IMRO THAT INVESTMENT BUSINESS HAD BEEN DELEGATED TO A FIRM WHICH HAD DEALING AND COMPLIANCE PROCEDURES WHICH DID NOT MEET IMRO'S STANDARDS. AS A RESULT OF THE SAME INVESTIGATION, HONG KONG BASED JARDINE FLEMING ASSET MANAGEMENT LIMITED (JFAM), WAS ALSO FINED 400,000 (ENGLISH POUNDS) BY IMRO FOR SIM BREACHES OF SIB PRINCIPLES AND IMRO RULES, PARTICULARLY IN RELATION TO THE FAILURE OF JFAM TO SUPERVISE AND INVESTMENT MANAGEMENT DELEGATE, JFIM. IN ADDITION, JFAM ACCEPTED THE TERMINATION OF ITS AUTHORIZATION WITH IMRO, IN A RELATED INVESTIGATION, JFIM, AN INVESTMENT ADVISORY AFFILIATE OF RFI, WAS PUBLICLY REPRIMANDED BY THE HONG KONG SECURITIES AND FUTURES COMMISSION (SFC) FOR BREACHES OF THE CODE OF CONDUCT FOR PERSONS REGISTERED WITH THE SFC. THE BREACHES RELATED TO JFIM'S INADEQUATE AND INEFFECTIVE INTERNAL CONTROLS AND COMPLIANCE MONITORING. JFIM ALSO AGREED WITH THE SFC, WITHOUT ADMITTING LIABILITY TO MAKE VOLUNTARY PAYMENTS TOTALING APPROIMATELY US \$19.1 MILLION TO COMPENSATE THREE CLIENTS WHICH WERE CONSIDERED BY THE SFC TO HAVE BEEN DISADVANTAGED BY THE LATE ALLOCATION OF DEALS BY ONE FUND MANAGER OF JFIM AFTER CHANGES IN THE PRICE OF THE INSTRUMENTS TRADED HAD OCCURRED. THE SFC REVOKED, FOR MISCONDUCT, THE REGISTRATION OF THE RESPONSIBLE FUND MANAGER AT JFIM AS AN INVESTMENT ADVISER, SECURITIES DEALER AND COMMODITES TRADING

**Initiated By:** IMRO (UK), HONG KONG SECURITIES & FUTURES COMMISSIONS ("SFC")

**Date Initiated:** 08/01/1996

**Docket/Case Number:**

**Principal Product Type:** Other

**Other Product Type(s):** FOREIGN EXCHANGE LISTED EQUITY SECURITY

**Principal Sanction(s)/Relief Sought:**



**Other Sanction(s)/Relief Sought:**

**Resolution:** Settled  
**Resolution Date:** 08/01/1996  
**Sanctions Ordered:** Monetary/Fine \$780,250.31

**Other Sanctions Ordered:**

**Sanction Details:** FLEMING INVESTMENT MANAGEMENT LIMITED, FLEMING INVESTMENT TRUST MANAGEMENT LIMITED AND SAVE & PROSPER SECURITIES LIMITED, ALL INVESTMENT ADVISORY AFFILIATES OF ROBERT FLEMING INC WERE EACH FINED 100,000 (BRITISH POUNDS) AND JARDINE FLEMING ASSET MANAGEMENT LIMITED, AN INVESTMENT ADVISORY AFFILIATE OF ROBERT FLEMING INC WAS FINED 400,000 (BRITISH POUNDS).

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**Reporting Source:** Firm  
**Affiliate:** JARDINE FLEMING INVESTMENT MANAGEMENT LIMITED  
**Current Status:** Final

**Allegations:** IN AUGUST 1996 FIM, FITM AND S&P ALL INVESTMENT ADVISORY AFFILIATES OF ROBERT FLEMING INC, WERE EACH FINED 100,000 (ENGLISH POUNDS) BY IMRO FOR BREACHES OF CERTAIN SEC AND INV. BOARD (SIB) PRINCIPALES AND IMRO RULES RELATING TO THE FAILURE OF FIM, FITM AND S&P TO SUPERVISE AN INVESTMENT MANAGEMENT DELEGATE, HONG KONG BASED JARDINE FLEMING INVESTMENT MANAGEMENT LIMITED (JFIM), IN RESPECT TO ENSURING ADEQUATE DEALING AND COMPLIANCE SYSTEMS AND PROCEDURES, FAILING TO TAKE ACTION WHEN THEY LEARNED OF WEAKNESSES, FAILING TO DISCLOSE THAT CERTAIN COMMISSIONS DISCLOSED TO CUSTOMERS WERE RETAINED BY AN ASSOCIATED BROKER AND FAILING TO INFORM IMRO THAT INVESTMENT BUSINESS HAD BEEN DELEGATED TO A FIRM WHICH HAD DEALING AND COMPLIANCE PROCEDURES WHICH DID NOT MEET IMRO'S STANDARDS. AS A RESULT OF THE SAME INVESTIGATION, HONG KONG BASED JARDINE FLEMING ASSET MANAGEMENT LIMITED (JFAM), WAS ALSO FINED 400,000 (ENGLISH POUNDS) BY IMRO FOR SIM BREACHES OF SIB PRINCIPLES AND IMRO RULES, PARTICULARLY IN RELATION TO THE FAILURE OF JFAM TO SUPERVISE AND INVESTMENT MANAGEMENT DELEGATE, JFIM. IN ADDITION, JFAM ACCEPTED THE TERMINATION OF ITS AUTHORIZATION WITH IMRO, IN A RELATED INVESTIGATION, JFIM, AN INVESTMENT ADVISORY AFFILIATE OF RFI, WAS PUBLICLY REPRIMANDED BY THE HONG KONG SECURITIES AND FUTURES COMMISSION (SFC) FOR BREACHES OF THE CODE OF CONDUCT FOR



PERSONS REGISTERED WITH THE SFC. THE BREACHES RELATED TO JFIM'S INADEQUATE AND INEFFECTIVE INTERNAL CONTROLS AND COMPLIANCE MONITORING. JFIM ALSO AGREED WITH THE SFC, WITHOUT ADMITTING LIABILITY TO MAKE VOLUNTARY PAYMENTS TOTALING APPROXIMATELY US \$19.1 MILLION TO COMPENSATE THREE CLIENTS WHICH WERE CONSIDERED BY THE SFC TO HAVE BEEN DISADVANTAGED BY THE LATE ALLOCATION OF DEALS BY ONE FUND MANAGER OF JFIM AFTER CHANGES IN THE PRICE OF THE INSTRUMENTS TRADED HAD OCCURRED. THE SFC REVOKED, FOR MISCONDUCT, THE REGISTRATION OF THE RESPONSIBLE FUND MANAGER AT JFIM AS AN INVESTMENT ADVISER, SECURITIES DEALER AND COMMODITIES TRADING

**Initiated By:** IMRO (UK), HONG KONG SECURITIES & FUTURES COMMISSIONS ("SFC")

**Date Initiated:** 08/01/1996

**Docket/Case Number:**

**Principal Product Type:** Other

**Other Product Type(s):** FOREIGN EXCHANGE LISTED EQUITY SECURITY

**Principal Sanction(s)/Relief Sought:**

**Other Sanction(s)/Relief Sought:**

**Resolution:** Settled

**Resolution Date:** 08/01/1996

**Sanctions Ordered:** Monetary/Fine \$780,250.31

**Other Sanctions Ordered:**

**Sanction Details:** FLEMING INVESTMENT MANAGEMENT LIMITED, FLEMING INVESTMENT TRUST MANAGEMENT LIMITED AND SAVE & PROSPER SECURITIES LIMITED, ALL INVESTMENT ADVISORY AFFILIATES OF ROBERT FLEMING INC WERE EACH FINED 100,000 (BRITISH POUNDS) AND JARDINE FLEMING ASSET MANAGEMENT LIMITED, AN INVESTMENT ADVISORY AFFILIATE OF ROBERT FLEMING INC WAS FINED 400,000 (BRITISH POUNDS).

**Reporting Source:** Firm

**Affiliate:** JARDINE FLEMING ASSET MANAGEMENT LIMITED

**Current Status:** Final

**Allegations:** IN AUGUST 1996 FIM, FITM AND S&P ALL INVESTMENT ADVISORY



AFFILIATES OF ROBERT FLEMING INC, WERE EACH FINED 100,000 (ENGLISH POUNDS) BY IMRO FOR BREACHES OF CERTAIN SEC AND INV. BOARD (SIB) PRINCIPALES AND IMRO RULES RELATING TO THE FAILURE OF FIM, FITM AND S&P TO SUPERVISE AN INVESMTNEMENT MANAGEMENT DELEGATE, HONG KONG BASED JARDINE FLEMING INVESTMENT MANAGEMENT LIMITED (JFIM), IN RESPECT TO ENSURING ADEQUATE DEALING AND COMPLIANCE SYSTEMS AND PROCEDURES, FAILING TO TAKE ACTION WHEN THEY LEARNED OF WEAKNESSES, FAILING TO DISCLOSE THAT CERTAIN COMMISSIONS DISCLOSED TO CUSTOMERS WERE RETAINED BY AN ASSOCIATED BROKER AND FAILING TO INFORM IMRO THAT INVESTMENT BUSINESS HAD BEEN DELEGATED TO A FIRM WHICH HAD DEALING AND COMPLIANCE PROCEDURES WHICH DID NOT MEET IMRO'S STANDARDS. AS A RESULT OF THE SAME INVESTIGATION, HONG KONG BASED JARDINE FLEMING ASSET MANAGEMENT LIMITED (JFAM), WAS ALSO FINED 400,000 (ENGLISH POUNDS) BY IMRO FOR SIM BREACHES OF SIB PRINCIPLES AND IMRO RULES, PARTICULARLY IN RELATION TO THE FAILURE OF JFAM TO SUPERVISE AND INVESTMENT MANAGEMENT DELEGATE, JFIM. IN ADDITION, JFAM ACCEPTED THE TERMINATION OF ITS AUTHORIZATION WITH IMRO, IN A RELATED INVESTIGATION, JFIM, AN INVESTMENT ADVISORY AFFILIATE OF RFI, WAS PUBLICLY REPRIMANDED BY THE HONG KONG SECURITIES AND FUTURES COMMISSION (SFC) FOR BREACHES OF THE CODE OF CONDUCT FOR PERSONS REGISTERED WITH THE SFC. THE BREACHES RELATED TO JFIM'S INADEQUATE AND INEFFECTIVE INTERNAL CONTROLS AND COMPLIANCE MONITORING. JFIM ALSO AGREED WITH THE SFC, WITHOUT ADMITTING LIABILITY TO MAKE VOLUNTARY PAYMENTS TOTALING APPROIMATELY US \$19.1 MILLION TO COMPENSATE THREE CLIENTS WHICH WERE CONSIDERED BY THE SFC TO HAVE BEEN DISADVANTAGED BY THE LATE ALLOCATION OF DEALS BY ONE FUND MANAGER OF JFIM AFTER CHANGES IN THE PRICE OF THE INSTRUMENTS TRADED HAD OCCURRED. THE SFC REVOKED, FOR MISCONDUCT, THE REGISTRATION OF THE RESPONSIBLE FUND MANAGER AT JFIM AS AN INVESTMENT ADVISER, SECURITIES DEALER AND COMMODITES TRADING

**Initiated By:** IMRO (UK), HONG KONG SECURITIES & FUTURES COMMISSIONS ("SFC")

**Date Initiated:** 08/01/1996

**Docket/Case Number:**

**Principal Product Type:** Other

**Other Product Type(s):** FOREIGN EXCHANGE LISTED EQUITY SECURITY

**Principal Sanction(s)/Relief Sought:**



**Other Sanction(s)/Relief Sought:**

**Resolution:** Settled  
**Resolution Date:** 08/01/1996  
**Sanctions Ordered:** Monetary/Fine \$780,250.31  
**Other Sanctions Ordered:**

**Sanction Details:** FLEMING INVESTMENT MANAGEMENT LIMITED, FLEMING INVESTMENT TRUST MANAGEMENT LIMITED AND SAVE & PROSPER SECURITIES LIMITED, ALL INVESTMENT ADVISORY AFFILIATES OF ROBERT FLEMING INC WERE EACH FINED 100,000 (BRITISH POUNDS) AND JARDINE FLEMING ASSET MANAGEMENT LIMITED, AN INVESTMENT ADVISORY AFFILIATE OF ROBERT FLEMING INC WAS FINED 400,000 (BRITISH POUNDS).

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**Reporting Source:** Firm  
**Affiliate:** FLEMING INVESTMENT MANAGEMENT LIMITED  
**Current Status:** Final

**Allegations:** IN AUGUST 1996 FIM, FITM AND S&P ALL INVESTMENT ADVISORY AFFILIATES OF ROBERT FLEMING INC, WERE EACH FINED 100,000 (ENGLISH POUNDS) BY IMRO FOR BREACHES OF CERTAIN SEC AND INV. BOARD (SIB) PRINCIPALES AND IMRO RULES RELATING TO THE FAILURE OF FIM, FITM AND S&P TO SUPERVISE AN INVESTMENT MANAGEMENT DELEGATE, HONG KONG BASED JARDINE FLEMING INVESTMENT MANAGEMENT LIMITED (JFIM), IN RESPECT TO ENSURING ADEQUATE DEALING AND COMPLIANCE SYSTEMS AND PROCEDURES, FAILING TO TAKE ACTION WHEN THEY LEARNED OF WEAKNESSES, FAILING TO DISCLOSE THAT CERTAIN COMMISSIONS DISCLOSED TO CUSTOMERS WERE RETAINED BY AN ASSOCIATED BROKER AND FAILING TO INFORM IMRO THAT INVESTMENT BUSINESS HAD BEEN DELEGATED TO A FIRM WHICH HAD DEALING AND COMPLIANCE PROCEDURES WHICH DID NOT MEET IMRO'S STANDARDS. AS A RESULT OF THE SAME INVESTIGATION, HONG KONG BASED JARDINE FLEMING ASSET MANAGEMENT LIMITED (JFAM), WAS ALSO FINED 400,000 (ENGLISH POUNDS) BY IMRO FOR SIM BREACHES OF SIB PRINCIPLES AND IMRO RULES, PARTICULARLY IN RELATION TO THE FAILURE OF JFAM TO SUPERVISE AND INVESTMENT MANAGEMENT DELEGATE, JFIM. IN ADDITION, JFAM ACCEPTED THE TERMINATION OF ITS AUTHORIZATION WITH IMRO, IN A RELATED INVESTIGATION, JFIM, AN INVESTMENT ADVISORY AFFILIATE OF RFI, WAS PUBLICLY REPRIMANDED BY THE HONG KONG SECURITIES AND FUTURES COMMISSION (SFC) FOR BREACHES OF THE CODE OF CONDUCT FOR



PERSONS REGISTERED WITH THE SFC. THE BREACHES RELATED TO JFIM'S INADEQUATE AND INEFFECTIVE INTERNAL CONTROLS AND COMPLIANCE MONITORING. JFIM ALSO AGREED WITH THE SFC, WITHOUT ADMITTING LIABILITY TO MAKE VOLUNTARY PAYMENTS TOTALING APPROXIMATELY US \$19.1 MILLION TO COMPENSATE THREE CLIENTS WHICH WERE CONSIDERED BY THE SFC TO HAVE BEEN DISADVANTAGED BY THE LATE ALLOCATION OF DEALS BY ONE FUND MANAGER OF JFIM AFTER CHANGES IN THE PRICE OF THE INSTRUMENTS TRADED HAD OCCURRED. THE SFC REVOKED, FOR MISCONDUCT, THE REGISTRATION OF THE RESPONSIBLE FUND MANAGER AT JFIM AS AN INVESTMENT ADVISER, SECURITIES DEALER AND COMMODITIES TRADING

**Initiated By:** IMRO (UK), HONG KONG SECURITIES & FUTURES COMMISSIONS ("SFC")

**Date Initiated:** 08/01/1996

**Docket/Case Number:**

**Principal Product Type:** Other

**Other Product Type(s):** FOREIGN EXCHANGE LISTED EQUITY SECURITY

**Principal Sanction(s)/Relief Sought:**

**Other Sanction(s)/Relief Sought:**

**Resolution:** Settled

**Resolution Date:** 08/01/1996

**Sanctions Ordered:** Monetary/Fine \$780,250.31

**Other Sanctions Ordered:**

**Sanction Details:** FLEMING INVESTMENT MANAGEMENT LIMITED, FLEMING INVESTMENT TRUST MANAGEMENT LIMITED AND SAVE & PROSPER SECURITIES LIMITED, ALL INVESTMENT ADVISORY AFFILIATES OF ROBERT FLEMING INC WERE EACH FINED 100,000 (BRITISH POUNDS) AND JARDINE FLEMING ASSET MANAGEMENT LIMITED, AN INVESTMENT ADVISORY AFFILIATE OF ROBERT FLEMING INC WAS FINED 400,000 (BRITISH POUNDS).

**Reporting Source:** Firm

**Affiliate:** SAVE & PROSPER SECURITIES LIMITED

**Current Status:** Final

**Allegations:** IN AUGUST 1996 FIM, FITM AND S&P ALL INVESTMENT ADVISORY



AFFILIATES OF ROBERT FLEMING INC, WERE EACH FINED 100,000 (ENGLISH POUNDS) BY IMRO FOR BREACHES OF CERTAIN SEC AND INV. BOARD (SIB) PRINCIPALES AND IMRO RULES RELATING TO THE FAILURE OF FIM, FITM AND S&P TO SUPERVISE AN INVESMTNEMENT MANAGEMENT DELEGATE, HONG KONG BASED JARDINE FLEMING INVESTMENT MANAGEMENT LIMITED (JFIM), IN RESPECT TO ENSURING ADEQUATE DEALING AND COMPLIANCE SYSTEMS AND PROCEDURES, FAILING TO TAKE ACTION WHEN THEY LEARNED OF WEAKNESSES, FAILING TO DISCLOSE THAT CERTAIN COMMISSIONS DISCLOSED TO CUSTOMERS WERE RETAINED BY AN ASSOCIATED BROKER AND FAILING TO INFORM IMRO THAT INVESTMENT BUSINESS HAD BEEN DELEGATED TO A FIRM WHICH HAD DEALING AND COMPLIANCE PROCEDURES WHICH DID NOT MEET IMRO'S STANDARDS. AS A RESULT OF THE SAME INVESTIGATION, HONG KONG BASED JARDINE FLEMING ASSET MANAGEMENT LIMITED (JFAM), WAS ALSO FINED 400,000 (ENGLISH POUNDS) BY IMRO FOR SIM BREACHES OF SIB PRINCIPLES AND IMRO RULES, PARTICULARLY IN RELATION TO THE FAILURE OF JFAM TO SUPERVISE AND INVESTMENT MANAGEMENT DELEGATE, JFIM. IN ADDITION, JFAM ACCEPTED THE TERMINATION OF ITS AUTHORIZATION WITH IMRO, IN A RELATED INVESTIGATION, JFIM, AN INVESTMENT ADVISORY AFFILIATE OF RFI, WAS PUBLICLY REPRIMANDED BY THE HONG KONG SECURITIES AND FUTURES COMMISSION (SFC) FOR BREACHES OF THE CODE OF CONDUCT FOR PERSONS REGISTERED WITH THE SFC. THE BREACHES RELATED TO JFIM'S INADEQUATE AND INEFFECTIVE INTERNAL CONTROLS AND COMPLIANCE MONITORING. JFIM ALSO AGREED WITH THE SFC, WITHOUT ADMITTING LIABILITY TO MAKE VOLUNTARY PAYMENTS TOTALING APPROIMATELY US \$19.1 MILLION TO COMPENSATE THREE CLIENTS WHICH WERE CONSIDERED BY THE SFC TO HAVE BEEN DISADVANTAGED BY THE LATE ALLOCATION OF DEALS BY ONE FUND MANAGER OF JFIM AFTER CHANGES IN THE PRICE OF THE INSTRUMENTS TRADED HAD OCCURRED. THE SFC REVOKED, FOR MISCONDUCT, THE REGISTRATION OF THE RESPONSIBLE FUND MANAGER AT JFIM AS AN INVESTMENT ADVISER, SECURITIES DEALER AND COMMODITES TRADING

**Initiated By:** IMRO (UK), HONG KONG SECURITIES & FUTURES COMMISSIONS ("SFC")

**Date Initiated:** 08/01/1996

**Docket/Case Number:**

**Principal Product Type:** Other

**Other Product Type(s):** FOREIGN EXCHANGE LISTED EQUITY SECURITY

**Principal Sanction(s)/Relief Sought:**

**Other Sanction(s)/Relief Sought:**

**Resolution:** Settled  
**Resolution Date:** 08/01/1996  
**Sanctions Ordered:** Monetary/Fine \$780,250.31  
**Other Sanctions Ordered:**

**Sanction Details:** FLEMING INVESTMENT MANAGEMENT LIMITED, FLEMING INVESTMENT TRUST MANAGEMENT LIMITED AND SAVE & PROSPER SECURITIES LIMITED, ALL INVESTMENT ADVISORY AFFILIATES OF ROBERT FLEMING INC WERE EACH FINED 100,000 (BRITISH POUNDS) AND JARDINE FLEMING ASSET MANAGEMENT LIMITED, AN INVESTMENT ADVISORY AFFILIATE OF ROBERT FLEMING INC WAS FINED 400,000 (BRITISH POUNDS).

**Disclosure 4 of 4**

**Reporting Source:** Firm

**Affiliate:** CHASE MANHATTAN INTERNATIONAL LIMITED

**Current Status:** Final

**Allegations:** (I) IT WAS ALLEGED THAT DURING THE PERIOD JAN. 30/31 TO MAR. 1997 (THE "RELEVANT PERIOD") CMI HAD FAILED TO PERFORM ADEQUATE DAILY POSITION AND MARGIN RECONCILIATIONS CONTRARY TO RULE 3.30.1 (II) IF THIS ALLEGATION WAS ACCEPTED THEN A VIOLATION OF RULE 2.2.6 WOULD NECESSARILY HAVE BEEN COMMITTED.

**Initiated By:** LONDON INTERNATIONAL FINANCIAL FUTURES AND OPTIONS EXCHANGE

**Date Initiated:** 03/01/1997

**Docket/Case Number:** SETTLEMENT CIRCULAR NO. S98/3

**Principal Product Type:** No Product

**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:** Civil and Administrative Penalt(ies) /Fine(s)

**Other Sanction(s)/Relief Sought:**

**Resolution:** Settled  
**Resolution Date:** 03/05/1998



**Sanctions Ordered:** Monetary/Fine \$60,000.00

**Other Sanctions Ordered:**

**Sanction Details:** THE AMOUNT OF THE MONETARY FINE CATEGORY IS 60,000 POUNDS.

## End of Report



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