

BrokerCheck Report

COMMONWEALTH AUSTRALIA SECURITIES LLC

CRD# 136321

Section Title	Page(s)
Report Summary	1
Firm Profile	2 - 6
Firm History	7
Firm Operations	8 - 14
Disclosure Events	15



When communicating online or investing with any professional, make sure you know who you're dealing with. <u>Imposters</u> might link to sites like BrokerCheck from <u>phishing</u> or similar scam websites, or through <u>social media</u>, 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
 - o 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.

Thank you for using FINRA BrokerCheck.



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



For additional information about the contents of this report, please refer to the User Guidance or 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.

www.finra.org/brokercheck
User Guidance

COMMONWEALTH AUSTRALIA SECURITIES LLC

CRD# 136321

SEC# 8-66998

Main Office Location

599 LEXINGTON AVENUE 30TH FL NEW YORK, NY 10022 Regulated by FINRA New York Office

Mailing Address

599 LEXINGTON AVENUE 30TH FL NEW YORK, NY 10022

Business Telephone Number

212 848-9200

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 limited liability company. This firm was formed in Delaware on 05/10/2005. Its fiscal year ends in June.

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 firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 35 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? **No**

This firm conducts 6 types of businesses.

This firm is affiliated with financial or investment institutions.

This firm has referral or financial arrangements with other brokers or dealers.

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:

2

Type Count

Regulatory Event

The number of disclosures from non-registered control affiliates is 9

This firm is classified as a limited liability company.

This firm was formed in Delaware on 05/10/2005.

Its fiscal year ends in June.

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.

COMMONWEALTH AUSTRALIA SECURITIES LLC

Doing business as COMMONWEALTH AUSTRALIA SECURITIES LLC

CRD# 136321

SEC# 8-66998

Main Office Location

599 LEXINGTON AVENUE 30TH FL NEW YORK, NY 10022

Regulated by FINRA New York Office

Mailing Address

599 LEXINGTON AVENUE 30TH FL NEW YORK, NY 10022

Business Telephone Number

212 848-9200



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): COMMONWEALTH BANK OF AUSTRALIA

Is this a domestic or foreign entity or an individual?

Foreign Entity

Position SOLE MEMBER

Position Start Date 05/2005

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

Legal Name & CRD# (if any):

FELDMAN, RICHARD MARK

2273453

Is this a domestic or foreign entity or an individual?

Individual

PFO Position

Position Start Date 12/2019

Percentage of Ownership Less than 5%

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

No

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

LAWRENCE, LARRY O

4237420

Is this a domestic or foreign entity or an individual?

Individual

CEO **Position**

Position Start Date 10/2024

User Guidance

Direct Owners and Executive Officers (continued)

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of

Yes

the firm?

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

POULTON, JAYSON ALAN

6738733

Is this a domestic or foreign entity or an individual?

Individual

Position

CFO & POO

Position Start Date

01/2023

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of

Yes

the firm?

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

VARALLI MCCLELLAND, ANN LOUISE

1043191

Is this a domestic or foreign entity or an individual?

Individual

Position

PRINCIPAL - FIXED INCOME

Position Start Date

11/2017

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of

Yes

the firm?

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

WALSH, PAUL ROBERT

User Guidance

Direct Owners and Executive Officers (continued)

3189041

Is this a domestic or foreign entity or an individual?

Individual

Position CHIEF COMPLIANCE OFFICER

Position Start Date 12/2018

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):

WINTERS, JENNIFER

2604316

Is this a domestic or foreign entity or an individual?

Individual

Position

ANTI-MONEY LAUNDERING COMPLIANCE OFFICER

Position Start Date

04/2017

Percentage of Ownership

Less than 5%

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

Yes

Is this a public reporting

No

company?

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

FINCA

Indirect Owners

No information reported.

Firm History

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

FINCA

No information reported.





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 currently registered with the SEC, 1 SRO and 35 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	01/12/2006

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: No

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: No

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	01/12/2006





U.S. States & Territories	Status	Date Effective
California	Approved	01/13/2006
Delaware	Approved	11/07/2017
District of Columbia	Approved	12/13/2017
Florida	Approved	03/23/2018
Georgia	Approved	04/13/2018
Hawaii	Approved	01/02/2018
Idaho	Approved	04/12/2018
Illinois	Approved	04/30/2018
Indiana	Approved	12/14/2018
Iowa	Approved	09/25/2017
Kansas	Approved	05/25/2018
Kentucky	Approved	09/25/2017
Louisiana	Approved	09/25/2017
Maryland	Approved	11/02/2017
Michigan	Approved	11/03/2017
Minnesota	Approved	11/29/2017
Mississippi	Approved	09/21/2017
Missouri	Approved	02/23/2018
Nevada	Approved	06/04/2018
New Hampshire	Approved	05/09/2018
New Jersey	Approved	08/07/2018
New Mexico	Approved	05/02/2018
New York	Approved	10/27/2005
North Dakota	Approved	01/11/2019
Ohio	Approved	02/21/2018
Oklahoma	Approved	10/31/2017
Pennsylvania	Approved	01/25/2018
South Carolina	Approved	11/03/2017
South Dakota	Approved	09/28/2017
Tennessee	Approved	12/07/2017
Texas	Approved	08/17/2018
Vermont	Approved	05/31/2017
Virginia	Approved	12/13/2017

U.S. States & Territories	Status	Date Effective
Washington	Approved	04/27/2018
Wisconsin	Approved	12/18/2017

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 6 types of businesses.

Types of Business

Broker or dealer retailing corporate equity securities over-the-counter

Broker or dealer selling corporate debt securities

Put and call broker or dealer or option writer

Non-exchange member arranging for transactions in listed securities by exchange member

Private placements of securities

Broker or dealer selling interests in mortgages or other receivables



FINCA

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.

Name: COMMONWEALTH BANK OF AUSTRALIA

Business Address: 48 MARTIN PLACE

SYDNEY, NSW, AUSTRALIA 1155

Effective Date: 05/10/2005

Description: THE APPLICANT INTRODUCES CUSTOMER ORDERS FOR U.S.

INSTITUTIONAL INVESTORS IN FIXED INCOME AND DEBT SECURITIES TO ITS PARENT COMPANY, COMMONWEALTH BANK OF AUSTRALIA ("CBA"), IN ACCORDANCE WITH RULE 15A-6 UNDER THE SECURITIES EXCHANGE ACT OF 1934 FOR EXECUTION AND SETTLEMENT ON A DELIVERY-VERSUS-PAYMENT BASIS. CBA WILL NOT CARRY ACCOUNTS,

OR HOLD FUNDS OR SECURITIES ON BEHALF OF ANY U.S.

CUSTOMERS.

Name: COMMONWEALTH SECURITIES LIMITED ("CSL")

Business Address: LOCKED BAG 22

AUSTRALIA SQUARE

SYDNEY, AUSTRALIA 1215

Effective Date: 05/10/2005

Description: THE APPLICANT INTRODUCES CUSTOMER ORDERS FOR U.S.

INSTITUTIONAL INVESTORS IN AUSTRALIAN STOCK EXCHANGE AND NEW ZEALAND STOCK EXCANGE ("NZX")LISTED AND TRADED EQUITY AND DERIVATIVE SECURITIES TO ITS AFFILIATE, CSL, IN ACCORDANCE WITH RULE 15A-6 UNDER THE SECURITIES EXCHANGE ACT OF 1934, FOR EXECUTION AND SETTLEMENT ON A DELIVERY-VERSUS-PAYMENT-

BASIS. CSL WILL NOT CARRY ACCOUNTS OR HOLD FUNDS OR

SECURITIES ON BEHALF OF ANY U.S. CUSTOMERS. WITH RESPECT TO

NZX LISTED SECURITIES, CSL WILL, IN TURN, ROUTE SUCH OR

Industry Arrangements



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

Name: BLOOMBERG VAULT LP

Business Address: 731 LEXINGTON AVE

NEW YORK, NY 10022

Effective Date: 04/19/2013

Description: THE FIRM SUBSCRIBES TO BLOOMBERG VAULT FOR ITS MESSAGE

COMPLIANCE SERVICE. BLOOMBERG REPRESENTS THAT FOR SO

LONG AS ITS AGREEMENT WITH THE FIRM IS IN EFFECT, THE BLOOMBERG HOSTED MESSAGE COMPLIANCE SERVICE IS IN COMPLIANCE WITH RULE 17A-4(F)(2) OF THE U.S. SECURITIES

EXCHANGE ACT.

This firm does not have accounts, funds, or securities maintained by a third party.

This firm does not have customer accounts, funds, or securities maintained by a third party.

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.

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.

COMMONWEALTH BANK OF AUSTRALIA controls the firm.

Business Address: COMMONWEALTH BANK PLACE SOUTH, LEVEL1

11 HARBOUR STREET

SYDNEY, NSW, AUSTRALIA 2000

Effective Date: 05/10/2005

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: Yes

Investment Advisory

Activities:

Yes

Description: THE APPLICANT IS A WHOLLY-OWNED SUBSIDIARY OF COMMONWEALTH

BANK OF AUSTRALIA.

ASB BANK LIMITED is under common control with the firm.

Business Address: ASB BANK CENTRE

135 ALBERT ST

AUCKLAND, NEW ZEALAND

Effective Date: 05/10/2005

Foreign Entity: Yes

Country: NEW ZEALAND

Securities Activities: Yes

Investment Advisory Yes

Activities:

Description: THE APPLCIANT AND ASB BANK LIMITED ARE AFFILIATED BY VIRTUE OF

BEING IN COMMON DIRECT OWNERSHIP BY COMMONWEALTH BANK OF

AUSTRALIA.

User Guidance

Organization Affiliates (continued)

COMMONWEALTH SECUIRITIES LIMITED is under common control with the firm.

Business Address: LOCKED BAG 22

AUSTRALIA SQUARE

SYDNEY, AUSTRALIA 1215

Effective Date: 05/10/2005

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: Yes

Investment Advisory Yes

Activities:

Description: THE APPLICANT AND COMMONWEALTH SECURITIES LIMITED ARE

AFFILIATED BY VIRTUE OF BEING IN COMMON, DIRECT OWNERSHIP BY

COMMONWEALTH BANK OF AUSTRALIA.

This firm is 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

COMMONWEALTH BANK OF AUSTRALIA is a Foreign Bank and controls the firm.

Business Address: COMMONWEALTH BANK PLACE SOUTH, LEVEL 1

11 HARBOUR STREET

SYDNEY, NSW, AUSTRALIA 2000

Effective Date: 05/10/2005

Description: THE APPLICANT IS A WHOLLY OWNED-SUBSIDIARY OF COMMONWEALTH

BANK OF AUSTRALIA.

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.

	Pending	Final	On Appeal
Regulatory Event	0	2	0



Disclosure Event Details

What you should know about reported disclosure events:

- 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:
 - o 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.
 - o 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 2

Reporting Source: Regulator

Current Status: Final



Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED

TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT

INACCURATELY REPORTED TO TRACE TRANSACTIONS IN TRACE-ELIGIBLE

SECURITIES WITHOUT THE REQUIRED "NO REMUNERATION" (NR)

INDICATOR. THE FINDINGS STATED THAT THE FIRM REPORTED THE PRICE AND A COMMISSION OF \$0.00 TO TRACE FOR TRANSACTIONS IN TRACE-ELIGIBLE CORPORATE DEBT SECURITIES AND FOR TRANSACTIONS IN TRACE-ELIGIBLE U.S. TREASURY SECURITIES BUT DID NOT APPEND THE

NR INDICATOR TO THOSE TRANSACTIONS, AS IS REQUIRED FOR

TRANSACTIONS FOR WHICH NO COMMISSION, MARK-UP OR MARK-DOWN

WAS CHARGED.

Initiated By: FINRA

Date Initiated: 11/09/2023

Docket/Case Number: 2022077355301

Principal Product Type: Other

Other Product Type(s): TRACE-ELIGIBLE CORPORATE DEBT SECURITIES; TRACE-ELIGIBLE U.S.

TREASURY SECURITIES

Principal Sanction(s)/Relief

Sought:

Other

Other Sanction(s)/Relief

Sought:

N/A

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 11/09/2023

Does the order constitute a final order based on

final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or No

deceptive conduct?

Sanctions Ordered: Censure

Monetary/Fine \$25,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$25,000. FINE PAID IN FULL ON

NOVEMBER 21, 2023.

.....

Reporting Source: Firm



Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED

TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT

INACCURATELY REPORTED TO TRACE TRANSACTIONS IN TRACE ELIGIBLE

SECURITIES WITHOUT THE REQUIRED "NO-REMUNERATION" (NR)

INDICATOR. THE FINDINGS STATED THAT THE FIRM REPORTED THE PRICE AND A COMMISSION OF \$0.00 TO TRACE FOR TRANSACTIONS IN TRACE-ELIGIBLE CORPORATE DEBT SECURITIES AND FOR TRANSACTIONS IN TRACE-ELIGIBLE U.S. TREASURY SECURITIES BUT DID NOT APPEND THE

NR INDICATOR TO THOSE TRANSACTIONS AS IS REQUIRED FOR

TRANSACTIONS FOR WHICH NO COMMISSION, MARK-UP OR MARK-DOWN

WAS CHARGED.

Initiated By: FINRA

Date Initiated: 11/09/2023

Docket/Case Number: 2022077355301

Principal Product Type: Other

Other Product Type(s): TRACE-ELIGIBLE CORPORATE DEBT SECURITIES; TRACE-ELIGIBLE U.S.

TREASURY SECURITIES.

Principal Sanction(s)/Relief

Sought:

Censure

Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 11/09/2023

Sanctions Ordered: Censure

Monetary/Fine \$25,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$25,000.

Disclosure 2 of 2

Reporting Source: Regulator

Current Status: Final

Allegations: FINRA RULES 2010 AND 6730: THE FIRM EXECUTED 610 TRADE REPORTING

AND COMPLIANCE ENGINE (TRACE) ELIGIBLE TRADES IN U.S. DOLLAR-DENOMINATED CORPORATE BONDS, IN EACH TRANSACTION ACTING AS



AN AGENT FOR A FOREIGN AFFILIATE THAT WAS DOING BUSINESS WITH INSTITUTIONAL COUNTERPARTIES IN THE UNITED STATES PURSUANT TO SEC RULE 15A-6. ALTHOUGH THE AFFILIATE ISSUED THE TRADE CONFIRMATION TO THE COUNTERPARTY, THE FIRM EXECUTED THE TRADES. IN THE MISTAKEN BELIEF THAT IT DID NOT ACT AS A "PARTY TO THE TRANSACTION" (AS THAT TERM IS DEFINED IN FINRA RULE 6710(C)).

THE FIRM DID NOT REPORT THESE TRADES TO TRACE.

Initiated By: FINRA

Date Initiated: 03/22/2013

Docket/Case Number: 2012030411501

Principal Product Type: Debt - Corporate

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Other

N/A

Nο

or ouriotion(s)/recitor

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 03/22/2013

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or

deceptive conduct?
Sanctions Ordered:

Censure

Monetary/Fine \$10,000.00

Other Sanctions Ordered: UNDERTAKINGS

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDING, THE FIRM CONSENTED

TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS,

THEREFORE IT IS CENSURED, FINED \$10,000, AND REQUIRED TO REPORT

TO TRACE THE CORPORATE BOND TRANSACTIONS THAT ARE

REFERENCED IN THIS AWC WITHIN 30 CALENDAR DAYS OF ACCEPTANCE

OF THIS AWC. FINE PAID IN FULL ON APRIL 4, 2013

Reporting Source: Firm

Current Status: Final



Allegations: DURING THE PERIOD FROM JANUARY 1, 2012 THROUGH SEPTEMBER 30,

2012, THE FIRM FAILED TO REPORT 610 TRANSACTIONS IN U.S. DOLLAR - DENOMINATED CORPORATE BONDS TO FINRA TRACE IN VIOLATION OF

FINRA RULES 6730 AND 2010

Initiated By: FINRA

Date Initiated: 03/22/2013

Docket/Case Number: 20120304115-01

Principal Product Type: Debt - Corporate

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other

Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 03/22/2013

Sanctions Ordered: Censure

Monetary/Fine \$10,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS THE FIRM CONCENTED

TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE, CENTURE AND FINE \$10,000. REQUIRED TO REPORT TO TRACE CORPORATE BOND TRANSACTIONS REFERENCED IN THE AWC

WITHIN 30 CALANDER DAYS OF ACCEPTANCE OF THE AWC.

www.finra.org/brokercheck
User Guidance

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.

	Pending	Final	On Appeal
Regulatory Event	0	3	0
Criminal	0	2	0
Civil Event	0	4	0



Disclosure Event Details

Regulatory - Final

Disclosure 1 of 3

Reporting Source: Firm

Affiliate: COLONIAL MUTUAL LIFE ASSURANCE SOCIETY LIMITED (CMLA)

Current Status: Final

Allegations: ON OCTOBER 10, 2005 APRA ISSUED DIRECTIONS AGAINST CMLA IN

RESPONSE TO UNIT PRICING ISSUES THAT HAD BEEN IDENTIFIED BY CMLA IN RELATION TO ITS UNIT LINKED LIFE INSURANCE PRODUCTS. SOME UNIT PRICES IN UNIT LINKED INVESTMENT OPTIONS WERE WRONG DUE TO THE INCORRECT ALLOCATION OF TAX CREDITS, THE INCORRECT TREATMENT OF TAX ALLOWANCES AND OTHER TAX RELATED PROBLEMS

AND PROCESSING IRREGULARITIES

Initiated By: AUSTRALIAN PRUDENTIAL REGULATORY AUTHORITY (APRA)

Date Initiated: 10/11/2005

Docket/Case Number:

Principal Product Type: Insurance

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Resolution: Order

Resolution Date: 10/11/2005

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: THE APRA DIRECTIONS REQUIRE CMLA TO IMPLEMENT A PLAN TO

ADDRESS DEFICIENCIES IN ITS UNIT PROCESSING PROCESSES AND

ENSURE THAT POLICY HOLDERS ARE FAIRLY COMPENSATED.

Firm Statement ON OCTOBER 10, 2005 APRA ISSUED DIRECTIONS AGAINST CMLA TO

IMPLEMENT A PLAN TO ADDRESS DEFICIENCIES IN ITS UNIT PROCESSION

PROCESSES IN RELATION TO ITS UNIT LINKED LIFE INSURANCE

PRODUCTS. THE DIRECTIONS ALSO REQUIRE CMLA TO ENSURE THAT

AFFECTED POLICYHOLDERS ARE FAIRLY COMPENSATED.

Other



Disclosure 2 of 3

Reporting Source: Firm

Affiliate: SOVEREIGN ASSURANCE COMPANY LIMITED ("SOVEREIGN")

Current Status: Final

Allegations: IN APRIL 2004, RESTRAINING ORDERS WERE SERVED ON SOVEREIGN AS

SECOND DEFENDANT IN RELATION TO THE DISPOSAL OF VOTING

SECURITIES IN NATIONAL PROPERTY TRUST. THE PROCEEDINGS WERE BROUGHT BY THE NEW ZEALAND SECURITIES COMMISSION IN RELATION

TO ALLEGED BREACHES BY SOVEREIGN OF THE SUBSTANTIAL

SECURITYHOLDER DISCLOSURE REQUIREMENTS OF THE SECURITIES MARKETS ACT OF 1988 AND THE SECURITIES REGULATIONS OF 1997.

Initiated By: NEW ZEALAND SECURITIES COMMISSION

Date Initiated: 04/01/2001

Docket/Case Number:

Principal Product Type: Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Resolution: Settled

Resolution Date: 07/23/2004

Firm Statement THE RESTRAINING ORDERS WERE DISCHARGED BY CONSENT OF ALL

PARTIES ON 7/23/2004 FOLLOWING SETTLEMENT OF THE RELEVANT

ISSUES.

Disclosure 3 of 3

Reporting Source: Firm

Affiliate: COMMONWEALTH BANK OF AUSTRALIA

Current Status: Final

Allegations: IT WAS ALLEGED THAT CBA BREACHED SCH TRIBUNAL BUSINESS RULE

5.9.1 (D), WHICH REQUIRES A LISTED COMPANY TO KEEP CERTAIN



SHAREHOLDER INFORMATION CONFIDENTIAL. DURING A MAILOUT TO SHAREHOLDERS, A PROCESSING ERROR AT CBA'S MAILING HOUSE RESULTED IN CERTAIN ACCOUNT STATEMENTS BEING INCORRECTLY PLACED IN ENVELOPES THAT WERE SENT TO OTHER SHAREHOLDERS.

Initiated By: AUSTRALIAN SECURITIES CLEARING HOUSE TRIBUNAL ("SCH TRIBUNAL")

Date Initiated: 04/01/2001

Docket/Case Number: NOT APPLICABLE

Principal Product Type: Equity Listed (Common & Preferred Stock)

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Censure

Other Sanction(s)/Relief

Sought:

Resolution: Decision

Resolution Date: 04/01/2001

Sanctions Ordered: Censure

Other Sanctions Ordered:

Sanction Details: THE SCH TRIBUNAL CENSURED CBA

Firm Statement IN APRIL 2001, THE SCH TRIBUNAL IMPOSED A CENSURE ON CBA FOR A

BREACH OF CERTAIN ASX RULES, CBA CONDUCTED A MAIL-OUT TO ITS SHAREHOLDERS AND CBA'S MAILING HOUSE INADVERTENTLY SENT PERSONAL INFORMATION ABOUT CERTAIN SHAREHOLDERS TO OTHER

SHAREHOLDERS. CBA NOTIFIED THE SCH TRIBUNAL AND A

CONTRVENTION NOTICE WAS ISSUED AFTER CBA TOOK PROMPT ACTION

TO RECTIFY THE ERROR, INCLUDING FULLY REVIEWING ITS ARRANGEMENTS TO PREVENT A FUTURE RECURRENCE.



Criminal - Final Disposition

Disclosure 1 of 2

Reporting Source: Firm

Affiliate: ASB BANK LIMITED ("ASB")

Current Status: Final

Status Date: 6/1/2021

Charge Details: ASB WAS SERVED WITH 159 CHARGES UNDER THE NEW ZEALAND FAIR

TRADING ACT OF 1986.

Felony: Yes

Court Details: DISTRICT COURT AT AUCKLAND, NEW ZEALAND

Charge Date: 03/22/2005

Disposition Details: ASB ISSUED A WARNING LETTER AND PAID RESTITUTION OF \$7.6 MILLION

(NZD) TO AFFECTED CUSTOMERS.

Firm Statement ON JUNE 1, 2021, THE COMMERCE COMMISSION OF NEW ZEALAND

ISSUED A WARNING LETTER TO ASB BANK LIMITED (ASB) RESOLVING THE INVESTIGATION OF ASB'S SELF-REPORTED ERROR IN ITS CALCULATION OF EARLY REPAYMENT ADJUSTMENT (ERA) FEES. THE WARNING LETTER WAS ISSUED BASED UPON THE FOLLOWING FACTORS: ASB'S PROACTIVE

CONDUCT IN SELF-REPORTING THE ERROR AND SUBSEQUENT COOPERATION WITH THE COMMISSION'S INVESTIGATION. ASB'S

REMEDIATION PROGRAM AND THE FACT THAT IT HAS BEEN EXTERNALLY

REVIEWED BY AN INDEPENDENT THIRD PARTY (KMPG) AND ASB'S

DECISION TO REFUND APPROXIMATELY \$7.6 MILLION NZD IN ERRONEOUS

CHARGES TO CUSTOMERS OF ASB. THE SELF-REPORTED ERROR

OCCURRED WHEN THE BANK'S STANDARD OPERATING PROCEDURE WAS NOT CONSISTENTLY FOLLOWED FOR CUSTOMERS MAKING CHANGES TO THE RELEVANT REPAYMENT DATE, AMOUNT AND FREQUENCY OF THEIR EXISTING LOAN AGREEMENTS EITHER IN BRANCH OR OVER THE PHONE.

THIS MATTER IS CLOSED.

Disclosure 2 of 2

Reporting Source: Firm

Affiliate: ASB BANK LIMITED ("ASB")

Current Status: Final

Status Date: 11/8/2000



Charge Details:

Felony: Yes

Court Details: DISTRICT COURT OF AUCKLAND, NEW ZEALAND

Charge Date: 08/16/2000

Disposition Details: ASB WAS CONVICTED AND FINED APPROXIMATELY NZD \$6,700.

Firm Statement ON 8/16/2000, A SUMMONS WAS ISSUED TO ASB ALLEGING THAT ASB

VIOLATED SECTION 11 OF THE NEW ZEALAND FAIR TRADING ACT FOR MISLEADING ADVERTISING IN RELATION TO A HOME LOAN PRODUCT. THE DISTRICT COURT AT AUCKLAND CONVICTED ASB ON 11/8/200 AND ASB WAS FINED APPROXIMATELY NZD \$6,700. THE NEW ZEALAND COMMERCE

COMMISSION INITIATED THE COURT ACTION.



Civil - Final

Disclosure 1 of 4

Reporting Source: Firm

Affiliate: COMMONWEALTH BANK OF AUSTRALIA

Current Status: Final

ASIC IS ALLEGING UNCONSCIONABLE CONDUCT AND MARKET

MANIPULATION IN RELATION TO THE COMMONWEALTH BANK OF AUSTRALIA'S ("CBA) INVOLVEMENT IN SETTING THE BANK BILL SWAP REFERENCE RATE ("BBSW") BETWEEN JANUARY 31, 2012 AND OCTOBER

2012.

Initiated By: AUSTRALIAN SECURITIES & INVESTMENTS COMMISSION ("ASIC")

Court Details: FEDERAL COURT OF AUSTRALIA, VICTORIAN REGISTRY, VID65/2018

Date Court Action Filed: 01/30/2018

Principal Product Type: Other

Other Product Types: DERIVATIVES AND WHOLESALE LOANS PRICED AGAINST BANK BILLS

SWAP RATE

Relief Sought: Other

Other Relief Sought: DECLARATIONS OF CONTRAVENTIONS OF CERTAIN SECTIONS OF THE

CORPORATIONS ACT, 2001 (CTH) AND ASIC ACT, 2001 (CTH) 2. ORDERS

FOR TRAINING PROGRAMS TO ADDRESS NON-COMPLIANCE

Resolution: Settled

Resolution Date: 06/21/2018

Sanctions Ordered or Relief

Granted:

Monetary/Fine \$20,000,000.00

Other Sanctions:

Sanction Details: ON 21 JUNE 2018, THE FEDERAL COURT APPROVED AN AGREEMENT

BETWEEN CBA AND ASIC TO RESOLVE PROCEEDINGS CONCERNING ALLEGED MARKET MANIPULATION AND UNCONSCIONABLE CONDUCT IN RESPECT OF THE BANK BILL MARKET. CBA PAID A CIVIL PENALTY OF \$5 MILLION AND A COMMUNITY BENEFIT PAYMENT OF \$15 MILLION TO FINANCIAL LITERACY AUSTRALIA. IT ALSO AGREED TO PAY ASIC'S COSTS OF THE INVESTIGATION AND LEGAL COSTS. THE GROUP PROVIDED FOR

THESE COSTS IN AN EARLIER PERIOD.

AS PART OF THE SETTLEMENT CBA ALSO ENTERED INTO AN EU WITH ASIC UNDER WHICH CBA UNDERTOOK TO ENGAGE AN INDEPENDENT EXPERT TO ASSESS CHANGES IT HAS MADE (AND WILL MAKE) TO ITS POLICIES,



PROCEDURES, CONTROLS SYSTEMS, TRAINING, GUIDANCE AND

FRAMEWORK FOR THE MONITORING AND SUPERVISION OF EMPLOYEES AND TRADING IN PRIME BANK BILLS AND CBA'S BBSW-REFERENCED PRODUCT BUSINESSES. CBA HAS DEVELOPED AND IMPLEMENTED AN ENHANCED CONTROL FRAMEWORK AS PART OF THIS PROGRAM OF WORK, CBA CONTINUES TO IMPLEMENT THE TERMS OF THE EU.

Firm Statement ALLEGED THAT CBA TRADED WITH THE INTENTION OF AFFECTING THE

LEVEL AT WHICH BBSW WAS SET

SO AS TO MAXIMIZE ITS PROFITS OR MINIMIZE ITS LOSSES TO THE

DETRIMENT OF THOSE HOLDING

OPPOSITE POSITIONS TO CBA'S. ALLEGED IT WAS UNCONSCIONABLE FOR CBA TO TRADE IN THIS WAY. AND TO ENTER INTO PRODUCTS PRICED OFF

THE BBSW WITHOUT DISCLOSING ITS TRADING PRACTICES TO ITS CUSTOMERS AND COUNTERPARTIES. ALLEGED THAT CBA'S TRADING CREATED AN ARTIFICIAL PRICE AND A FALSE APPEARANCE WITH RESPECT

TO THE MARKET FOR SOME OF THESE PRODUCTS.

Disclosure 2 of 4

Reporting Source: Firm

Affiliate: COMMONWEALTH BANK OF AUSTRALIA LIMITED

Current Status: Final

Allegations: ALLEGED NON-COMPLIANCE WITH THE ANTI-MONEY LAUNDERING

COUNTER-TERRORISM FINANCING ACT 2006, INCLUDING THE ALLEGED: -FAILURE TO COMPLY WITH ITS AML PROGRAM UNDER SECTION 82 OF

THAT ACT:

-DELAY IN FILING THRESHOLD TRANSACTION REPORTS WITHIN THE

PRESCRIBED TIME FRAME UNDER SECTION 43 OF THAT ACT;

-DELAY OR FAILURE IN FILING SUSPICIOUS MATTER REPORTS UNDER

SECTION 41 OF THAT ACT; AND

-FAILURE TO UNDERTAKE ONGOING CUSTOMER DUE DILIGENCE UNDER

SECTION 36 OF THAT ACT.

Initiated By: CHIEF EXECUTIVE OFFICER OF THE AUSTRALIAN TRANSACTION REPORTS

AND ANALYSIS CENTRE

Court Details: FEDERAL COURT OF AUSTRALIA

Date Court Action Filed: 08/03/2017

Date Notice/Process Served: 08/03/2017

Principal Product Type: No Product

Other Product Types:



Relief Sought: Civil Penalty(ies)/Fine(s)

Other Relief Sought:

Resolution: Settled

Resolution Date: 06/20/2018

Sanctions Ordered or Relief

Granted:

Monetary/Fine \$535,500,000.00

Other Sanctions: REGULATOR LEGAL COSTS \$1,900,000

Sanction Details: CBA HAS ENTERED INTO AN AGREEMENT WITH AUSTRAC, THE

AUSTRALIAN GOVERNMENT'S FINANCIAL INTELLIGENCE AGENCY, TO RESOLVE THE CIVIL PROCEEDINGS COMMENCED BY AUSTRAC IN THE FEDERAL COURT OF AUSTRALIA ON 3 AUGUST 2017. FOLLOWING COURT ORDERED MEDIATION BETWEEN CBA AND AUSTRAC, CBA WILL PAY A CIVIL PENALTY OF \$535,500,000 (AU\$700 MILLION) TOGETHER WITH AUSTRAC'S

LEGAL COSTS OF \$1,900,000

(AU\$2.5 MILLION). CBA HAS ADMITTED FURTHER CONTRAVENTIONS OF AUSTRALIA'S ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM (AML/CTF) ACT, BEYOND THOSE ALREADY ADMITTED, INCLUDING

CONTRAVENTIONS IN RISK PROCEDURES, REPORTING, MONITORING AND

CUSTOMER DUE-DILIGENCE. AUSTRAC'S CIVIL PROCEEDINGS ARE

OTHERWISE DISMISSED.

Firm Statement THE PROCEEDINGS BROUGHT BY AUSTRAC PRIMARILY RELATED TO

DEPOSITS MADE THROUGH THE COMMONWEALTH BANK OF AUSTRALIA'S INTELLIGENT DEPOSIT MACHINES ("IDMS") AND THE REPORTING OF POTENTIALLY SUSPICIOUS ACTIVITY THROUGH USING THESE IDMS BETWEEN 2012 AND 2015. BETWEEN 2012 AND 2015 A CODING ERROR MEANT THAT SOME OF THE REPORTS RELATING TO CASH DEPOSITS PROCESSED THROUGH OUT IDMS WERE NOT GENERATED AND SENT TO

AUSTRAC.

Disclosure 3 of 4

Reporting Source: Firm

Affiliate: SOVEREIGN ASSURANCE COMPANY LIMITED ("SOVEREIGN")

Current Status: Final

Allegations: RESTRAINING ORDERS WERE SERVED ON SOVEREIGN IN CONNECTON

WITH ALLEGATIONS THAT SOVEREIGN BREACHED SUBSTANTIAL SECURITYHOLDER DISCLOSURE REQUIREMENTS UNDER THE

SECURITIES MARKET ACT OF 1988 AND THE SECURITIES (SUBSTANTIAL

SECURITY HOLDER) REGULATIONS ACT OF 1997.



Initiated By: NEW ZEALAND SECURITIES COMMISSION.

Court Details: HIGH COURT AT WELLINGTON, NEW ZEALAND

Date Court Action Filed: 04/01/2001

Principal Product Type:

Other Product Types:

Relief Sought: Restraining Order

Other Relief Sought:

Resolution: Settled

Resolution Date: 07/23/2004

Sanctions Ordered or Relief

Granted:

Other Sanctions:

Sanction Details:

Firm Statement RESTRAINING ORDERS WERE SERVED ON SOVEREIGN AS SECOND

DEFENDANT IN RELATION TO THE DISPOSAL OF VOTING SECURITIES IN NATIONAL PROPERTY TRUST IN RELATION TO ALLEGED BREACHES BY SOVEREIGN OF THE SUBSTANTIAL SECURITYHOLDER DISCLOSURE REQUIREMENTS OF THE SECURITIES MARKETS ACT OF 1988 AND THE SECURITIES REGULATIONS OF 1997. THE HIGH COURT OF WELLINGTON COMMENCED PROCEEDINGS, HOWEVER, THE ITERIM ORDERS WERE DISCHARGED BY CONSENT OF ALL PARTIES FOLLOWING SETTLEMENT OF

THE RELEVANT ISSUES.

Disclosure 4 of 4

Reporting Source: Firm

Affiliate: COMMONWEALTH BANK OF AUSTRALIA ("CBA")

Current Status: Final

Allegations: THE ACCC ALLEGED THAT CERTAIN ADVERTISEMENTS PUBLISHED BY CBA

WERE MISLEADING AND BREACHED SECTIONS 52& 53 OF AUSTRALIA'S

TRADE PRACTICES ACT.

Initiated By: AUSTRALIAN COMPETITION AND CONSUMER COMMISSION ("ACCC")

Court Details: FEDERAL COURT OF AUSTRALIA

Date Court Action Filed: 09/25/2002



Principa	l Prod	luct T	ype:
----------	--------	--------	------

Other Product Types:

Relief Sought:

Other Relief Sought:

Resolution: Judgment Rendered

Resolution Date: 10/17/2003

Sanctions Ordered or Relief

Granted:

Other Sanctions: THE FEDERAL COURT OF AUSTRALIA REFUSED INJUNCTIVE RELIEF AND

ORDERED DECLARATORY RELIEF AND CORRECTIVE ADVERTISING.

Sanction Details:

Firm Statement ON 9/25/2002, THE ACCC COMMENCED AN ACTION IN THE FEDERAL COURT

OF AUSTRALIA AGAINST CBA ALLEGING THAT CERTAIN TELEVISION AND INBRANCH ADVERTISEMENTS RELATING TO HOME LOANS PUBLISHED BY

CBA WERE MISLEADING AND BREACHED SECTIONS 52 AND 53 OF AUSTRALIA'S TRADE PRACTICES ACT. THE FEDERAL COURT OF

AUSTRALIA FOUND THAT CBA HAD INFRINGED THE TRADE PRACTICES

ACT, GAVE DECLARATORY RELIEF AND ORDERED CORRECTIVE

ADVERTISING.

End of Report



This page is intentionally left blank.