

BrokerCheck Report
GPC SECURITIES, INC.
 CRD# 14007

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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:
 - o 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.



GPC SECURITIES, INC.

CRD# 14007

SEC# 8-30108

Main Office Location

600 PEACHTREE ST NE, 2ND FL
GA1-006-02-54
ATLANTA, GA 30308

Mailing Address

101 S TRYON ST
NC1-002-19-44
CHARLOTTE, NC 28255

Business Telephone Number

877-879-7317

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 Georgia on 08/27/1981.
Its fiscal year ends in December.

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 44

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: 11/30/2011

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 Georgia on 08/27/1981.

Its fiscal year ends in December.

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.

GPC SECURITIES, INC.

Doing business as GPC SECURITIES, INC.

CRD# 14007

SEC# 8-30108

Main Office Location

600 PEACHTREE ST NE, 2ND FL

GA1-006-02-54

ATLANTA, GA 30308

Mailing Address

101 S TRYON ST

NC1-002-19-44

CHARLOTTE, NC 28255

Business Telephone Number

877-879-7317



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):	THE PRINCETON RETIREMENT GROUP, INC.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	SOLE SHAREHOLDER
Position Start Date	07/2005
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):	ALEXANDER, MARK DAVID 2202934
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF FINANCIAL OFFICER & TREASURER
Position Start Date	05/2010
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):	COCO, GLORIA JEAN ANGEL 716459
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF EXECUTIVE OFFICER & DIRECTOR
Position Start Date	05/2011

Firm Profile



Direct Owners and Executive Officers (continued)

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): DOWNING, KEVIN RINARD
2939663

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

Position CHIEF COMPLIANCE OFFICER

Position Start Date 07/2004

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): VARCO, DEBORAH ANN
1214688

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

Position CHIEF OPERATIONS OFFICER & DIRECTOR

Position Start Date 11/2011

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

Legal Name & CRD# (if any): BANK OF AMERICA CORPORATION

Is this a domestic or foreign entity or an individual? Domestic Entity

Company through which indirect ownership is established MERRILL LYNCH & CO., INC.

Relationship to Direct Owner SHAREHOLDER

Relationship Established 12/2008

Percentage of Ownership 75% or more

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

Is this a public reporting company? Yes

Legal Name & CRD# (if any): MERRILL LYNCH & CO., INC.

Is this a domestic or foreign entity or an individual? Domestic Entity

Company through which indirect ownership is established THE PRINCETON RETIREMENT GROUP, INC.

Relationship to Direct Owner SHAREHOLDER

Relationship Established 07/2005

Percentage of Ownership 75% or more

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

Is this a public reporting company? Yes

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 01/16/1984 to 01/30/2012.

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 7 types of businesses.

Types of Business

Broker or dealer retailing corporate equity securities over-the-counter
Broker or dealer selling corporate debt securities
Mutual fund retailer
U S. government securities broker
Municipal securities broker
Non-exchange member arranging for transactions in listed securities by exchange member
Private placements of securities

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.

Name:	PENSON FINANCIAL SERVICES, INC.
CRD #:	25866
Business Address:	1700 PACIFIC AVENUE, SUITE 1400 DALLAS, TX 75205
Effective Date:	06/28/2010
Description:	BASED ON OUR ORIGINAL AGREEMENT WITH RIDGE CLEARING & OUTSOURCING, INC. ("RIDGE"), PENSON FINANCIAL SERVICES, INC. ("PENSON") (FORMERLY KNOWN AS RIDGE) HAS AGREED TO CLEAR AND SETTLE TRANSACTIONS ON A FULLY DISCLOSED BASIS FOR ACCOUNTS OF GPC SECURITIES, INC. ("GPC") CUSTOMERS THAT ARE INTRODUCED BY GPC AND ACCEPTED BY PENSON. THE AGREEMENT IDENTIFIES AND SETS FORTH CERTAIN FUNCTIONS AND RESPONSIBILITIES OF BOTH PENSON AND GPC PURSUANT TO NASD RULE 3230.

Firm Operations

Industry Arrangements



This firm does not have books or records maintained by a third party.

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.



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.**

CONVERSUS ASSET MANAGEMENT, LLC is under common control with the firm.

Business Address:	190 SOUTH LASALLE STREET SUITE 1500 CHICATO, IL 60603
Effective Date:	01/01/2009
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	BANK OF AMERICA CORPORATION, APPLICANT'S PARENT COMPANY HOLDS A 50% INDIRECT OWNERSHIP INTEREST IN THIS ENTITY.

BANC OF AMERICA CAPITAL ACCESS FUNDS MANAGEMENT LLC is under common control with the firm.

CRD #:	157801
Business Address:	135 SOUTH LASALLE STREET CHICAGO, IL 60603
Effective Date:	01/01/2009
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	WHOLLY/MAJORITY-OWNED INDIRECT SUBIDIARY OF BANK OF AMERICA CORPORATION, APPLICANT'S PARENT COMPANY.

Firm Operations



Organization Affiliates (continued)

MERRILL LYNCH GLOBAL PRIVATE EQUITY, INC. is under common control with the firm.

CRD #:	157851
Business Address:	2 WORLD FINANCIAL CENTER, 38TH FL. NEW YORK, NY 10281-6138
Effective Date:	08/31/1994
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH (AUSTRALIA) PTY LIMITED is under common control with the firm.

Business Address:	GOVERNOR PHILLIP TOWER, LEVEL 38 SYDNEY, NEW SOUTH WALES, AUSTRALIA 2000
Effective Date:	04/23/1971
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

VENCO, B.V. is under common control with the firm.

Business Address:	PO BOX 309, UGLAND HOUSE, 113 S. CHURCH STREET GEORGETOWN, CAYMAN ISLANDS 00000
Effective Date:	01/01/2009
Foreign Entity:	Yes
Country:	CAYMAN ISLANDS
Securities Activities:	Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: No

Description: VENCO, B.V. IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BANK OF AMERICA CUSTODIAL SERVICES (IRELAND) LIMITED is under common control with the firm.

Business Address: TWO PARK PLACE, HATCH STREET
DUBLIN 2, IRELAND

Effective Date: 01/01/2009

Foreign Entity: Yes

Country: IRELAND

Securities Activities: Yes

Investment Advisory Activities: No

Description: BANK OF AMERICA CUSTODIAL SERVICES (IRELAND) LIMITED IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT COMPANY.

CTC CONSULTING, LLC is under common control with the firm.

CRD #: 147053

Business Address: 4380 SW MACADAM AVE.
SUITE 490
PORTLAND, OR 97239-6407

Effective Date: 01/01/2009

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: BANK OF AMERICA CORPORATION ("BAC"), ULTIMATE PARENT OF APPLICANT, HOLDS AN OWNERSHIP INTEREST IN THIS ENTITY BUT DOES NOT HAVE VOTING RIGHTS OR CONTRACTUAL RIGHTS THAT BAC BELIEVES CONSTITUTE ACTUAL CONTROL OVER CTC AND ITS DAY-TO-DAY ACTIVITIES.

Firm Operations



Organization Affiliates (continued)

BOFA DISTRIBUTORS, INC. is under common control with the firm.

CRD #:	30683
Business Address:	ONE FINANCIAL CENTER BOSTON, MA 02111
Effective Date:	01/01/2009
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	BOFA DISTRIBUTORS, INC., (FORMERLY COLUMBIA FUNDS DISTRIBUTOR, INC.) IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BOFA ADVISORS, LLC is under common control with the firm.

CRD #:	107900
Business Address:	100 FEDERAL STREET BOSTON, MA 02110
Effective Date:	01/01/2009
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	BOFA ADVISORS, LLC (FORMERLY BANC OF AMERICA CAPITAL MANAGEMENT, LLC) IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BOSTON SECURITIES S.A. SOCIEDAD DE BOLSA is under common control with the firm.

Business Address:	FLORIDA 681, 9TH FLOOR OFFICE 72 BUENOS AIRES, ARGENTINA
Effective Date:	01/01/2009

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	Yes
Country:	ARGENTINA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	BOSTON SECURITIES S.A. SOCIEDAD DE BOLSA IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BANK OF AMERICA, NATIONAL ASSOCIATION is under common control with the firm.

Business Address:	101 SOUTH TRYON STREET CHARLOTTE, NC 28255
Effective Date:	01/01/2009
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	BANK OF AMERICA, NATIONAL ASSOCIATION IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BANK OF AMERICA SINGAPORE LIMITED is under common control with the firm.

Business Address:	REPUBLIC PLAZA, TOWER 1, #18-00 , 9 RAFFLES PLACE SINGAPORE, SINGAPORE 048619
Effective Date:	01/01/2009
Foreign Entity:	Yes
Country:	SINGAPORE
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	BANK OF AMERICA SINGAPORE LIMITED IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BANK OF AMERICA MEXICO, S.A., INSTITUCION DE BANCA MULTIPLE is under common control with the

Firm Operations



Organization Affiliates (continued)

firm.

Business Address: PASEO DE LA REFORMA #265
PISO #22 COL. CUAUHTEMOC
MEXICO CITY, MEXICO 06500

Effective Date: 11/01/2010

Foreign Entity: Yes

Country: MEXICO

Securities Activities: Yes

Investment Advisory Activities: No

Description: BANK OF AMERICA MEXICO S.A., INSTITUCION DE BANCA MULTIPLE, GRUPO FINANCIERO BANK OF AMERICA IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BANK OF AMERICA CAPITAL ADVISORS LLC is under common control with the firm.

Business Address: 100 FEDERAL STREET
18TH FLOOR
BOSTON, MA 02110

Effective Date: 01/01/2009

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: BANK OF AMERICA CAPITAL ADVISORS, LLC IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BANC OF AMERICA SPECIALIST, INC. is under common control with the firm.

CRD #: 103971

Business Address: 14 WALL STREET
21ST FLOOR
NEW YORK, NY 10005

Effective Date: 01/01/2009

Foreign Entity: No

Firm Operations



Organization Affiliates (continued)

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: BANC OF AMERICA SPECIALIST, INC. IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BANC OF AMERICA SECURITIES LIMITED is under common control with the firm.

Business Address: 5 CANADA SQUARE
E14-5AQ
LONDON, ENGLAND, UNITED KINGDOM E14-5AQ

Effective Date: 01/01/2009

Foreign Entity: Yes

Country: UNITED KINGDOM

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: BANC OF AMERICA SECURITIES LIMITED IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BANC OF AMERICA SECURITIES ASIA LIMITED is under common control with the firm.

Business Address: 48F, TAIPAI 101 TOWER, NO. 7
WIN YI ROAD, SEC. 5
TAIPAI, TAIWAN 11049

Effective Date: 01/01/2009

Foreign Entity: Yes

Country: CHINA

Securities Activities: Yes

Investment Advisory Activities: No

Description: BANC OF AMERICA ASIA LIMITED IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BANC OF AMERICA SECURITIES (INDIA) PRIVATE LIMITED is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: EXPRESS TOWERS, NARIMAN POINT
MUMBAI 400 021, INDIA

Effective Date: 01/01/2009

Foreign Entity: Yes

Country: INDIA

Securities Activities: Yes

Investment Advisory Activities: No

Description: BANC OF AMERICA SECURITIES (INDIA) PRIVATE LIMITED IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BANC OF AMERICA INVESTMENT ADVISORS, INC. is under common control with the firm.

CRD #: 104713

Business Address: 101 HUDSON STREET, 9TH FLOOR
JERSEY CITY, NJ 07302

Effective Date: 01/01/2009

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: BANC OF AMERICA INVESTMENT ADVISORS, INC.(FORMERLY LIBERTY ASSET MANAGEMENT COMPANY) IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BANC OF AMERICA CAPITAL MANAGEMENT (IRELAND), LIMITED is under common control with the firm.

Business Address: WILLIAM FRY
SOLICITORS OF FITZWILTON HOUSE, WILTON PLACE
DUBLIN 2, IRELAND

Effective Date: 01/01/2009

Foreign Entity: Yes

Country: IRELAND

Securities Activities: No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: BANC OF AMERICA CAPITAL MANAGEMENT (IRELAND), LIMITED IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BACAP ALTERNATIVE ADVISORS, INC. is under common control with the firm.

Business Address: ONE BRYANT PARK, 28TH FLOOR
NEW YORK, NY 10036

Effective Date: 01/01/2009

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: No

Description: BACAP ALTERNATIVE ADVISORS, INC IS A COMMODITY POOL OPERATOR AND IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BA SECURITIES AUSTRALIA LIMITED is under common control with the firm.

Business Address: 19-29 MARTIN PLACE
SYDNEY NEW SOUTH WALES, AUSTRALIA 2000

Effective Date: 01/01/2009

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: Yes

Investment Advisory Activities: No

Description: BA SECURITIES AUSTRALIA LIMITED IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BA AUSTRALIA LIMITED is under common control with the firm.

Business Address: LEVEL 63, MLC CENTER, 19-29 MARTIN PLACE
SYDNEY, AUSTRALIA, AUSTRALIA 00000

Effective Date: 01/01/2009

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	BA AUSTRALIA LIMITED IS A SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH, PIERCE, FENNER & SMITH DE ARGENTINA SOCIEDAD ANONIMA, FINANCIERA, MOBILIARIA Y DE MANDATOS is under common control with the firm.

Business Address:	BOUCHARD 547 BUENOS AIRES, ARGENTINA 1106
Effective Date:	07/15/2005
Foreign Entity:	Yes
Country:	ARGENTINA
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

STERLING STAMOS CAPITAL MANAGEMENT, L.P. is under common control with the firm.

CRD #:	134660
Business Address:	450 PARK AVENUE 29TH FLOOR NEW YORK, NY 10022
Effective Date:	07/01/2007
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	MERRILL LYNCH & CO., INC., APPLICANT'S ULTIMATE PARENT COMPANY,

Firm Operations



Organization Affiliates (continued)

HAS A 50% EQUITY OWNERSHIP IN STERLING STAMOS CAPITAL MANAGEMENT, L.P. MERRILL LYNCH & CO., INC., IS A WHOLLY/MAJORITY OWNED SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH & CO., INC. controls the firm.

Business Address: 4 WORLD FINANCIAL CENTER
NEW YORK, NY 10080

Effective Date: 07/15/2005

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: No

Description: WHOLLY/MAJORITY OWNED SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH INTERNATIONAL INCORPORATED is under common control with the firm.

Business Address: C/O THE CORPORATION TRUST COMPANY
CORPORATION TRUST CENTER, 1209 ORANGE STREET
WILMINGTON, DE 19801

Effective Date: 07/15/2005

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH COMMODITIES (EUROPE) LIMITED is under common control with the firm.

Business Address: MERRILL LYNCH FINANCIAL CENTRE
2 KING EDWARD STREET
LONDON, ENGLAND, UNITED KINGDOM EC1A 1HQ

Effective Date: 07/15/2005

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	Yes
Country:	UNITED KINGDOM
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH VALORES SA SOCIEDAD DE BOLSA is under common control with the firm.

Business Address:	TORRE BOUCHARD, BOUCHARD 547 BUENOS AIRES, ARGENTINA 1106
Effective Date:	01/09/2007
Foreign Entity:	Yes
Country:	ARGENTINA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH MONEY MARKETS INC. is under common control with the firm.

Business Address:	4 WORLD FINANCIAL CENTER NEW YORK, NY 10080
Effective Date:	07/15/2005
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH S.A. CORRETORA DE TITULOS E VALORES MOBILIARIOS is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: AV. BRIGADEIRO FARIA LIMA, 3400, 16TH FLOOR
SAO PAULO - SP; CEP 04538-132, BRAZIL

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: BRAZIL

Securities Activities: Yes

Investment Advisory Activities: No

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH MENKUL DEGERLER AS is under common control with the firm.

Business Address: KANYON OFFICE BLOCK, 11TH FLOOR
BUYUKDEERE ST.
LEVENT, ISTANBUL, TURKEY 34394

Effective Date: 12/07/2006

Foreign Entity: Yes

Country: TURKEY

Securities Activities: Yes

Investment Advisory Activities: No

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH YATIRIM BANK AS is under common control with the firm.

Business Address: KANYON OFFICE BLOCK, 11TH FLOOR
BUYUKDEERE ST.
LEVENT, ISTANBUL, TURKEY 34394

Effective Date: 12/07/2006

Foreign Entity: Yes

Country: TURKEY

Securities Activities: Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities:	No
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

OOO MERRILL LYNCH SECURITIES is under common control with the firm.

Business Address:	ZNAMENKA ST. 7 BLD. 3 MOSCOW, RUSSIA 119019
Effective Date:	01/09/2007
Foreign Entity:	Yes
Country:	RUSSIA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH PORTFOLIO MANAGERS LIMITED is under common control with the firm.

Business Address:	MERRILL LYNCH FINANCIAL CENTRE 2 KING EDWARD STREET LONDON, ENGLAND, UNITED KINGDOM EC1A 1HQ
Effective Date:	07/15/2005
Foreign Entity:	Yes
Country:	UNITED KINGDOM
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH PORTFOLIO MANAGERS (CHANNEL ISLANDS) LIMITED is under common control with the firm.

Business Address:	FORUM HOUSE, GRENVILLE STREET ST. HELIER, JERSEY JE4 8RL
Effective Date:	07/14/2006

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	Yes
Country:	JERSEY
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH ISRAEL LTD. is under common control with the firm.

Business Address:	1 AZRIELI CENER, ROUND TOWER TEL AVIV, ISRAEL 67021
Effective Date:	07/15/2005
Foreign Entity:	Yes
Country:	ISRAEL
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH, PIERCE, FENNER & SMITH SAS is under common control with the firm.

Business Address:	112 AVENUE KLEBER PARIS, FRANCE 75116
Effective Date:	07/15/2005
Foreign Entity:	Yes
Country:	FRANCE
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH (AUSTRALIA) FUTURES LIMITED is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: LEVEL 38, GOVERNOR PHILLIP TOWER, 1 FARRER PLACE
SYDNEY, AUSTRALIA 2000

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: Yes

Investment Advisory Activities: No

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH EQUITIES (AUSTRALIA) LIMITED is under common control with the firm.

Business Address: LEVEL 38, GOVERNOR PHILLIP TOWER, 1 FARRER PLACE
SYDNEY, AUSTRALIA 2000

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: Yes

Investment Advisory Activities: No

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH SINGAPORE COMMODITIES PTE LTD is under common control with the firm.

Business Address: TEMASEK AVE., #29-01 MILLENIA TOWER
SINGAPORE, SINGAPORE 039192

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: SINGAPORE

Securities Activities: Yes

Investment Advisory Activities: No

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA

Firm Operations



Organization Affiliates (continued)

CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH (SINGAPORE) PTE LTD. is under common control with the firm.

Business Address: TEMASEK AVE., #28-01 MILLENIA TOWER
SINGAPORE, SINGAPORE 039192

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: SINGAPORE

Securities Activities: Yes

Investment Advisory Activities: No

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH FUTURES (HONG KONG) LIMITED is under common control with the firm.

Business Address: CITIBANK TOWER, 15TH FLOOR, 3 GARDEN RD.
CENTRAL HONG KONG, HONG KONG

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: HONG KONG

Securities Activities: Yes

Investment Advisory Activities: No

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH SECURITIES (TAIWAN) LTD. is under common control with the firm.

Business Address: 9F, 17F, 18F, 23F, 207, TUN HWA SOUTH ROAD
SECTION 2
TAIPEI, TAIWAN, R.O.C.

Effective Date: 09/01/2008

Foreign Entity: Yes

Country: TAIWAN

Securities Activities: Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities:	No
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH CORREDORES DE BOLSA SPA is under common control with the firm.

Business Address:	AV. APOCQUINDO 3500 PISO 9 SANTIAGO, CHILE
Effective Date:	07/18/2008
Foreign Entity:	Yes
Country:	CHILE
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MANAGED ACCOUNT ADVISORS LLC is under common control with the firm.

CRD #:	142558
Business Address:	101 HUDSON STREET, 7TH FL JERSEY CITY, NJ 07302
Effective Date:	02/27/2007
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH FINANCIAL MARKETS, INC. is under common control with the firm.

CRD #:	131322
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Firm Operations



Organization Affiliates (continued)

Business Address: 4 WORLD FINANCIAL CENTER
NEW YORK, NY 10080

Effective Date: 07/15/2005

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

DSP MERRILL LYNCH LIMITED is under common control with the firm.

Business Address: MAFATLAL CENTRE, 10TH FLOOR
NARIMAN POINT
MUMBAI, INDIA 400021

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: INDIA

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH CHILE S.A. is under common control with the firm.

Business Address: SANCHEZ FONTECILLA 310 10TH FLOOR
LOS CONDES
SANTIAGO, CHILE

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: CHILE

Securities Activities: Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities:	No
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

TMC BONDS L.L.C. is under common control with the firm.

CRD #:	104507
Business Address:	825 THIRD AVENUE, 14TH FLOOR NEW YORK, NY 10022
Effective Date:	07/15/2005
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	TMC BONDS MBRS (MLPF&S/MORGAN STANLEY DEAN WITTER/SALOMON SMITH BARNEY, INC/CHAPDELAINE & CO/LEHMAN BROTHERS/FSA PORTFOLIO MANAGEMENT INC) AGREED TO JOINTLY OWN/OPERATE TMC BONDS' ELECTRONIC FACILITY FOR DIST OF SECURITIES INVENTORY AMONG AND BETWEEN BROKER-DEALERS AND SUCH OTHER PARTICIPANTS AS TMC BONDS MAY DETERMINE FROM TIME TO TIME AND FOSTER GROWTH AND SUCCESS OF SUCH FACILITY IN ACCORDANCE WITH TERMS OF (TMC BONDS) AGREEMENT. MLPF&S IS AN INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION.

MERRILL LYNCH FAR EAST LIMITED is under common control with the firm.

Business Address:	15/F CITIBANK TOWER, 3 GARDEN ROAD CENTRAL HONG KONG, HONG KONG NONE
Effective Date:	07/15/2005
Foreign Entity:	Yes
Country:	HONG KONG
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA

Firm Operations



Organization Affiliates (continued)

CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH CAPITAL MARKETS ESPANA, S.A., S.V. is under common control with the firm.

Business Address: TORRE PICASSO 39-40
PLAZA PABLO RUIZ PICASSO S/N
MADRID, SPAIN 28020

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: SPAIN

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

PT MERRILL LYNCH INDONESIA is under common control with the firm.

Business Address: JAKARTA STOCK EXCHANGE BUILDING; J1
JENDRAL SUDIRMAN KAV 52-53
JAKARTA, INDONESIA 12190

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: INDONESIA

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH SOUTH AFRICA (PROPRIETARY) LIMITED is under common control with the firm.

Business Address: 27 DIAGONAL ST.
JOHANNESBURG, SOUTH AFRICA NONE

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: SOUTH AFRICA

Firm Operations



Organization Affiliates (continued)

Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH (LUXEMBOURG) S.A.R.L. is under common control with the firm.

Business Address:	68/70 BLVD DE LA PETRUSSE GRAND DUCHY, LUXEMBOURG L2320
Effective Date:	07/15/2005
Foreign Entity:	Yes
Country:	LUXEMBOURG
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH MEXICO, S.A. DE C.V., CASA DE BOLSA is under common control with the firm.

Business Address:	PASEO DE LA REFORMA 115, PISO 19 LOMAS DE CHAPULTEPEC MÉXICO, D.F., MEXICO 11000
Effective Date:	07/15/2005
Foreign Entity:	Yes
Country:	MEXICO
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH INTERNATIONAL & CO. C.V. is under common control with the firm.

Business Address:	C/O ALEXANDER & SIMON #2 GAITOWEG CURACAO, CURACAO NONE
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Firm Operations



Organization Affiliates (continued)

Effective Date: 07/15/2005
Foreign Entity: Yes
Country: CURACAO
Securities Activities: Yes
Investment Advisory Activities: No
Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH INTERNATIONAL BANK LIMITED is under common control with the firm.

Business Address: TREASURY BLDG.
 LOWER GRAND CANAL ST.
 DUBLIN 2, IRELAND NONE
Effective Date: 07/15/2005
Foreign Entity: Yes
Country: IRELAND
Securities Activities: Yes
Investment Advisory Activities: No
Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH CAPITAL MARKETS AG is under common control with the firm.

Business Address: STAUFFACHERSTRASSE 5
 ZURICH, SWITZERLAND CH-8004
Effective Date: 07/15/2005
Foreign Entity: Yes
Country: SWITZERLAND
Securities Activities: Yes
Investment Advisory Activities: No
Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA

Firm Operations



Organization Affiliates (continued)

CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH (ASIA PACIFIC) LTD. is under common control with the firm.

Business Address: ST. GEORGE'S BUILDING
2 ICE HOUSE ST.
CENTRAL HONG KONG, CHINA NONE

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: HONG KONG

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH ARGENTINA S.A. is under common control with the firm.

Business Address: BOUCHARD 547 PISO 23
(1106) CAPITAL FEDERAL
BUENOS AIRES, ARGENTINA 11106

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: ARGENTINA

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH ALTERNATIVE INVESTMENTS LLC is under common control with the firm.

CRD #: 105067

Business Address: 4 WORLD FINANCIAL CENTER
250 VESEY STREET, 6TH FLOOR
NEW YORK, NY 10080

Effective Date: 07/15/2005

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

KECALP INC. is under common control with the firm.

CRD #:	109787
Business Address:	225 LIBERTY STREET NEW YORK, NY 10281
Effective Date:	07/15/2005
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH, PIERCE, FENNER & SMITH (MIDDLE EAST) S.A.L. is under common control with the firm.

Business Address:	STARCO BLDG, NORTH BLOC (2ND FL) P O BOX 5316 BEIRUT, LEBANON 11-5316
Effective Date:	07/15/2005
Foreign Entity:	Yes
Country:	LEBANON
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

Firm Operations



Organization Affiliates (continued)

MERRILL LYNCH, PIERCE, FENNER & SMITH LIMITED is under common control with the firm.

Business Address:	25 ROPEMAKER STREET LONDON, ENGLAND EC2Y 9LY
Effective Date:	07/15/2005
Foreign Entity:	Yes
Country:	ENGLAND
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH S.A.M. is under common control with the firm.

Business Address:	LEPRINCE DEGALLES, 3/5 AVE DES CITRONNIERS PB 163 MONTE CARLO, MONACO NONE
Effective Date:	07/15/2005
Foreign Entity:	Yes
Country:	MONACO
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH PROFESSIONAL CLEARING CORP. is under common control with the firm.

CRD #:	16139
Business Address:	101 HUDSON STREET, 7TH FLOOR JERSEY CITY, NJ 07302
Effective Date:	07/15/2005
Foreign Entity:	No
Country:	
Securities Activities:	Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: No

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH JAPAN SECURITIES CO., LTD. is under common control with the firm.

Business Address: NIHONBASHI 1-CHOME BUILDING
1-4-1 NIHONBASHI
CHIYODA-KU, TOKYO, TOKYO 100-0004

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: JAPAN

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH INTERNATIONAL (AUSTRALIA) LTD is under common control with the firm.

Business Address: LEVEL 49 MLC CENTRE, 19-29 MARTIN PLACE
SYDNEY, AUSTRALIA 2000

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: No

Investment Advisory Activities: Yes

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH INTERNATIONAL is under common control with the firm.

Business Address: 25 ROPEMAKER STREET
LONDON, ENGLAND EC2Y 9LY

Effective Date: 07/15/2005

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	Yes
Country:	ENGLAND
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH GOVERNMENT SECURITIES INC. is under common control with the firm.

Business Address:	ONE BRYANT PARK NEW YORK, NY 10036
Effective Date:	07/15/2005
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH ESPANOLA AGENCIA DE VALORES S.A. is under common control with the firm.

Business Address:	PASEO DE LA CASTELLANO 31-7-8 7 PLANTA MADRID, SPAIN 28046
Effective Date:	07/15/2005
Foreign Entity:	Yes
Country:	SPAIN
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH EQUITIES LIMITED is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: 25 ROPEMAKER PLACE
LONDON, ENGLAND EC2Y9LY

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: ENGLAND

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH CAPITAL MARKETS (FRANCE) S.A.S. is under common control with the firm.

Business Address: 112, AVENUE KLEBER
PARIS CEDEX, FRANCE 75761

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: FRANCE

Securities Activities: Yes

Investment Advisory Activities: No

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH CANADA INC. is under common control with the firm.

Business Address: 181 BAY STREET, SUITE 400, BCE PLACE
TORONTO, CANADA M5J2V8

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: CANADA

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA

Firm Operations



Organization Affiliates (continued)

CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH BANK (SUISSE) S.A. is under common control with the firm.

Business Address: 7 RUE MUNIER ROMILLY
GENEVA, SWITZERLAND CH-1211

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: SWITZERLAND

Securities Activities: No

Investment Advisory Activities: Yes

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BERNDALE SECURITIES LTD. is under common control with the firm.

Business Address: 42/120 COLLINS ST.
MELBOURNE, AUSTRALIA 3000

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: No

Investment Advisory Activities: Yes

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BANCO MERRILL LYNCH DE INVESTIMENTOS S.A. is under common control with the firm.

Business Address: AVENIDA PAULISTA 37
SAO PAULO, BRAZIL 01311-902

Effective Date: 07/15/2005

Foreign Entity: Yes

Country: BRAZIL

Securities Activities: Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities:	No
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED is under common control with the firm.

CRD #:	7691
Business Address:	ONE BRYANT PARK NEW YORK, NY 10036
Effective Date:	07/15/2005
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

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

BANK OF AMERICA CORPORATION is a Bank Holding Company and controls the firm.

Business Address:	100 NORTH TRYON STREET CHARLOTTE, NC 28144
Effective Date:	01/01/2009
Description:	BANK OF AMERICA CORPORATION (56-0906609) IS A MULTI-BANK HOLDING COMPANY REGISTERED UNDER THE BANK HOLDING COMPANY ACT OF 1956 WITH ITS PRINCIPAL ASSETS BEING THE STOCK OF THE SUBSIDIARIES. ONE OF ITS WHOLLY-OWNED SUBSIDIARIES IS NB HOLDINGS CORPORATION.

Firm Operations



Organization Affiliates (continued)



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	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:**
 - o 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:**
 - o 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 1

Reporting Source: Regulator

Current Status: Final



Allegations: Not Provided

Initiated By: MASSACHUSETTS SECURITIES DIVISION

Date Initiated: 08/03/1994

Docket/Case Number: R-94-085

URL for Regulatory Action:

Principal Product Type:

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 08/03/1994

Sanctions Ordered: Monetary/Fine \$340.00

Other Sanctions Ordered:

Sanction Details: Not Provided

Regulator Statement

THE MASSACHUSETTS SECURITIES DIVISION ENTERED A
CONSENT ORDER, R-94-085, ON AUGUST 3, 1994 PROVIDING FOR THE
CONDITIONAL REGISTRATION OF INVESCO SERVICES, INC. ("ISI") AS A
BROKER-DEALER. THE ORDER IMPOSES, INTER ALIA, AN ADMINISTRATIVE
FINE OF \$340.00 UPON ISI FOR VIOLATIONS OF SECTION 201 OF THE
ACT, PROVIDES FOR A NOTICE OF RESCISSION TO ALL BROKER-DEALERS
WHO EFFECTED SECURITIES TRANSACTIONS IN THE EBI FUNDS IN MA
THROUGH ISI AT A TIME WHEN ISI MAINTAINED A PLACE OF BUSINESS
IN MA AND WAS NOT DULY REGISTERED AS A BROKER-DEALER IN MA, AND
REQUIRES ISI TO ADOPT WRITTEN SUPERVISORY PROCEDURES TO
PREVENT
FUTURE VIOLATIONS OF THE ACT. CONTACT: 617-727-3548

Reporting Source: Firm

Current Status: Final

Allegations: AMVESCAP SERVICES, INC. (NOW KNOWN AS GPC SECURITIES, INC.)
MAINTAINED A MARKETING SALES OFFICE IN MASSACHUSETTS IN
VIOLATION OF SECTION 201 OF THE MASSACHUSETTS UNIFORM
SECURITIES ACT. (NOT REGISTERING AS A BROKER/DEALER).



Initiated By:	COMMONWEALTH OF MASSACHUSETTS SECURITIES DIVISION
Date Initiated:	07/18/1994
Docket/Case Number:	R-94-085
Principal Product Type:	Other
Other Product Type(s):	NOT APPLICABLE
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	08/04/1994
Sanctions Ordered:	Monetary/Fine \$340.00
Other Sanctions Ordered:	
Sanction Details:	REGISTRATION OF A BROKER/DEALER TO BE APPROVED PENDING CERTAIN OTHER STATED CONDITION.

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	39	0
Civil Event	1	4	0



Disclosure Event Details

Regulatory - Final

Disclosure 1 of 39

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH MEXICO, S.A. DE C.V., CASA DE BOLSA
Current Status:	Final
Allegations:	BANCO DE MEXICO ALLEGED THAT DURING THE PERIOD FROM MARCH 14-29, 2011, MERRILL LYNCH MEXICO S.A. DE C.V., CASA DE BOLSA ("MERRILL LYNCH MEXICO") (1) VIOLATED NUMERAL 5, THIRD PARAGRAPH, OF CIRCULAR 4/2006 WHEN THREE OPTION TRANSACTIONS IN EFFECT AS OF AUGUST 14, 2009 WERE NOT CONFIRMED THROUGH ANY MEANS WITH WRITTEN PROOF OF THE EXECUTION OF THE CORRESPONDING TRANSACTIONS ON THE SAME DAY THEY WERE EXECUTED AND (2) VIOLATED NUMERAL 10.5 OF CIRCULAR 4/2006 WHEN MERRILL LYNCH MEXICO EXECUTED CREDIT DERIVATIVE TRANSACTIONS.
Initiated By:	BANCO DE MEXICO
Date Initiated:	04/29/2011
Docket/Case Number:	RESOLUTION: S34-133-2011
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	10/06/2011
Sanctions Ordered:	Monetary/Fine \$5,937.26
Other Sanctions Ordered:	N/A
Sanction Details:	BANCO DE MEXICO FINED MERRILL LYNCH MEXICO 22,858.00 PESOS (APPROXIMATELY USD\$1,690.11) AND 57,441.00 PESOS (APPROXIMATELY USD\$4,247.15) FOR THE RESPECTIVE VIOLATIONS FOR A TOTAL FINE OF 80,299 PESOS (APPROXIMATELY USD\$5,937.26).
Firm Statement	BANCO DE MEXICO FINED MERRILL LYNCH MEXICO (1) 22,858.00 PESOS (APPROX. USD\$1,690.11) FOR THE VIOLATION OF NUMERAL 5, THIRD



PARAGRAPH, OF CIRCULAR 4/2006 WHEN THREE OPTION TRANSACTIONS IN EFFECT AS OF AUGUST 14, 2009 WERE NOT CONFIRMED THROUGH ANY MEANS WITH WRITTEN PROOF OF THE EXECUTION OF THE CORRESPONDING TRANSACTIONS ON THE SAME DAY THEY WERE EXECUTED AND (2) 57,441.00 PESOS (APPROXIMATELY USD\$4,247.15) FOR THE VIOLATION OF NUMERAL 10.5 OF CIRCULAR 4/2006 WHEN MERRILL LYNCH MEXICO EXECUTED CREDIT DERIVATIVE TRANSACTIONS. MERRILL LYNCH MEXICO PAID SAID FINES ON OCTOBER 25, 2011.

Disclosure 2 of 39

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA MEXICO, S.A., INSTITUCION DE BANCA MULTIPLE
Current Status:	Final
Allegations:	BANCO DE MEXICO ALLEGED THAT DURING THE PERIOD FROM MARCH 14-29, 2011, BANK OF AMERICA MEXICO, S.A., INSTITUCION DE BANCA MULTIPLE ("BANK OF AMERICA MEXICO") VIOLATED NUMERALS 3.1.1 AND 3.2.1 OF CIRCULAR 4/2006 WHEN BANK OF AMERICA MEXICO PERFORMED CREDIT DERIVATIVE TRANSACTIONS AS INTERMEDIARY WITHOUT HAVING THE BANCO DE MEXICO AUTHORIZATION TO PERFORM SUCH TRANSACTIONS.
Initiated By:	BANCO DE MEXICO
Date Initiated:	04/11/2011
Docket/Case Number:	RESOLUTION: S34-128-2011
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	10/06/2011
Sanctions Ordered:	Monetary/Fine \$7,355.56
Other Sanctions Ordered:	N/A
Sanction Details:	BANCO DE MEXICO FINED BANK OF AMERICA MEXICO 99,482.00 PESOS (APPROXIMATELY USD\$7,355.56 FOR THE VIOLATION.

**Firm Statement**

BANCO DE MEXICO FINED BANK OF AMERICA MEXICO 99,482.00 PESOS (APPROXIMATELY USD\$7,355.56) FOR THE VIOLATION OF NUMERALS 3.1.1 AND 3.2.1 OF CIRCULAR 4/2006 WHEN BANK OF AMERICA MEXICO PERFORMED CREDIT DERIVATIVE TRANSACTIONS AS INTERMEDIARY WITHOUT HAVING THE BANCO DE MEXICO AUTHORIZATION TO PERFORM SUCH TRANSACTIONS. BANK OF AMERICA MEXICO PAID SAID FINES ON OCTOBER 25, 2011.

Disclosure 3 of 39

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH (ASIA PACIFIC) LIMITED
Current Status:	Final
Allegations:	THE SFC RAISED CONCERNS THAT MERRILL LYNCH (ASIA PACIFIC) LIMITED (MLAPL) FAILED TO PROPERLY ASSESS THE FINANCIAL SITUATION AND INVESTMENT OBJECTIVES OF OVER 40 OF THE 72 CUSTOMERS WHO INVESTED IN TWO INDEX-LINKED NOTES DURING 2007. THE SFC WAS ALSO CONCERNED THAT KEY PRODUCT INFORMATION WAS ONLY PROVIDED TO CLIENTS AFTER THEY HAD AGREED TO INVEST IN THE INDEX-LINKED NOTES AND THAT MLAPL KEPT INADEQUATE DOCUMENTATION TO EXPLAIN THE RATIONALE BEHIND THE ADVISE THEY HAD GIVEN TO THEIR CUSTOMERS.
Initiated By:	HONG KONG SECURITIES AND FUTURES COMMISSION (SFC)
Date Initiated:	12/09/2010
Docket/Case Number:	500/EN/715
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	REPRIMAND, REPURCHASE PROGRAM AND UNDERTAKINGS
Resolution:	Settled
Resolution Date:	05/12/2011
Sanctions Ordered:	Monetary/Fine \$385,921.00
Other Sanctions Ordered:	REPRIMAND, REPURCHASE PROGRAM AND UNDERTAKINGS
Sanction Details:	THE SFC ISSUED A REPRIMAND TO MLAPL AND FINED IT HKD3 MILLION



(USD385,921). IN ADDITION, MLAPL HAS AGREED TO IMPLEMENT A RESOLUTION SCHEME IN WHICH IT WILL MAKE PAYMENT TO REPURCHASE FROM CUSTOMERS HOLDING THE OUTSTANDING INDEX-LINKED NOTES WITHIN 30 DAYS OF MLAPL RECEIVING VALID ACCEPTANCE FORMS FORM CUSTOMERS AT 100% OF THE PRINCIPAL AMOUNT INVESTMENT. IN ADDITION, MLAPL HAS AGREED TO OFFER TOP UP PAYMENTS TO CUSTOMERS WHO BOUGHT THE INDEX-LINKED NOTES THROUGH MLAPL AND REDEEMED THEM FOR LESS THAN THEIR PRINCIPAL INVESTED. MLAPL WILL IMPLEMENT ENHANCED COMPLAINT-HANDLING PROCEDURES TO REVIEW CLIENT COMPLAINTS REGARDING ITS DISTRIBUTION, SALE, AND PROVISION OF INVESTMENT ADVICE IN RELATION TO UNLISTED STRUCTURED PRODUCTS OTHER THAN THE TWO INDEX-LINKED NOTES THAT ARE THE SUBJECT OF THIS DISCLOSURE. MLAPL WILL ALSO ENGAGE AN INDEPENDENT AUDIT FIRM TO CONDUCT A REVIEW OF ITS INTERNAL DISTRIBUTION SYSTEMS AND CONTROLS.

Firm Statement

THE SFC ISSUED A REPRIMAND TO MLAPL AND FINED IT HKD3 MILLION (USD385,921). IN ADDITION, MLAPL HAS AGREED TO IMPLEMENT A RESOLUTION SCHEME IN WHICH IT WILL MAKE PAYMENT TO REPURCHASE FROM CUSTOMERS HOLDING THE OUTSTANDING INDEX-LINKED NOTES WITHIN 30 DAYS OF MLAPL RECEIVING VALID ACCEPTANCE FORMS FORM CUSTOMERS AT 100% OF THE PRINCIPAL AMOUNT INVESTMENT. IN ADDITION, MLAPL HAS AGREED TO OFFER TOP UP PAYMENTS TO CUSTOMERS WHO BOUGHT THE INDEX-LINKED NOTES THROUGH MLAPL AND REDEEMED THEM FOR LESS THAN THEIR PRINCIPAL INVESTED. MLAPL WILL IMPLEMENT ENHANCED COMPLAINT-HANDLING PROCEDURES TO REVIEW CLIENT COMPLAINTS REGARDING ITS DISTRIBUTION, SALE, AND PROVISION OF INVESTMENT ADVICE IN RELATION TO UNLISTED STRUCTURED PRODUCTS OTHER THAN THE TWO INDEX-LINKED NOTES THAT ARE THE SUBJECT OF THIS DISCLOSURE. MLAPL WILL ALSO ENGAGE AN INDEPENDENT AUDIT FIRM TO CONDUCT A REVIEW OF ITS INTERNAL DISTRIBUTION SYSTEMS AND CONTROLS. THE SFC ACKNOWLEDGED MLAPL'S FULL COOPERATION TO RESOLVE THE SFC'S CONCERNS AND NOTES THAT MLAPL HAS ALREADY COMMENCED ITS OWN REVIEW OF INTERNAL SYSTEMS AND CONTROLS.

Disclosure 4 of 39

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH (ASIA PACIFIC) LIMITED
Current Status:	Final
Allegations:	THE SFC FOUND THAT DURING THE PERIOD FROM DECEMBER 2007 TO OCTOBER 2008, A MANAGING DIRECTOR OF MERRILL LYNCH (ASIA PACIFIC) LIMITED (MLAPL) AND MERRILL LYNCH FUTURES (HONG KONG)



LIMITED (MLFHKL) HAD MISMARKED A TRADING BOOK IN EXOTICS OPTIONS (BOOK) BY MANIPULATING THE VOLATILITY MARKS IN THE VALUATION MODEL, AND ACCESSED THE COMPUTER SYSTEM WITHOUT AUTHORITY TO ALTER PRICING PARAMETERS ON VARIOUS OCCASIONS. THE MISMARKING ACTIVITIES, WHICH DID NOT APPLY TO OTHER BOOKS, RESULTED IN THE VALUE OF THE BOOK BEING INFLATED BY APPROXIMATELY US\$25 MILLION AND CAUSED THE ACTUAL LOSS IN THE BOOK TO BE WRONGLY REPORTED INTERNALLY. THE SFC FOUND THAT MLAPL AND MLFHKL DID NOT HAVE ADEQUATE INTERNAL CONTROLS PROCEDURES IN PLACE TO MANAGE THE RISKS ASSOCIATED WITH MISMARKING, IN THAT (I) THERE WAS UNCERTAINTY AS TO SUPERVISORY RESPONSIBILITIES OVER THE TRADER AND THE BOOK; (II) THE PRICE VERIFICATION MECHANISM APPLIED TO OTHER TRADING BOOKS WAS NOT APPLIED TO THE BOOK; (III) THERE WERE INADEQUATE CHECKS AND BALANCES OVER THE BOOK TO MITIGATE OPERATION RISKS INCLUDING RISKS ASSOCIATE WITH FRAUD AND DISHONEST ACTIVITIES; (IV) THERE WAS INSUFFICIENT SAFEGUARD OVER INFORMATION SECURITY AND INTEGRITY AS REGARDS THE BOOK; (V) TRADING AND VALUATION POLICIES WERE NOT SUFFICIENTLY IMPLEMENTED OVER THE BOOK; AND (IV) SENIOR MANAGEMENT FAILED TO ADEQUATELY MANAGE THE RISKS ASSOCIATED WITH THE BOOK.

Initiated By:	HONG KONG SECURITIES AND FUTURES COMMISSION (SFC)
Date Initiated:	03/03/2009
Docket/Case Number:	500/3N/703
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	REPRIMAND
Resolution:	Decision
Resolution Date:	05/31/2010
Sanctions Ordered:	Monetary/Fine \$449,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE SFC FINED MLAPL AND MLFHKL HKD\$3,500,000 (USD449,000.00) FOR SYSTEMS AND CONTROLS FAILINGS ASSOCIATED WITH THE MISMARKING ACTIVITIES IN A TRADING BOOK.
Firm Statement	THE SFC FINED MLAPL AND MLFHKL HKD\$3,500,000 (USD 449,000.00) FOR



SYSTEMS AND CONTROLS FAILINGS ASSOCIATED WITH THE MISMARKING ACTIVITIES IN A TRADING BOOK. MLAPL AND MLFHKL ACCEPTED THAT ITS SYSTEMS AND CONTROLS FELL SHORT OF THOSE EXPECTED IN RESPECT OF THE BOOK. THE SFC ACCEPTED THAT MLAPL'S AND MLFHKL'S MISCONDUCT WAS NOT INTENTIONAL AND MLAPL AND MLFHKL HAVE TAKEN REMEDIAL STEPS TO ADDRESS THE COMPLIANCE WEAKNESSES. IN DECIDING ON THE SANCTIONS, THE SFC TOOK INTO ACCOUNT MLAPL'S AND MLFHKL'S COOPERATION IN RESOLVING THE CASE.

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH FUTURES (HONG KONG) LIMITED
Current Status:	Final
Allegations:	THE SFC FOUND THAT DURING THE PERIOD FROM DECEMBER 2007 TO OCTOBER 2008, A MANAGING DIRECTOR OF MERRILL LYNCH (ASIA PACIFIC) LIMITED (MLAPL) AND MERRILL LYNCH FUTURES (HONG KONG) LIMITED (MLFHKL) HAD MISMARKED A TRADING BOOK IN EXOTICS OPTIONS (BOOK) BY MANIPULATING THE VOLATILITY MARKS IN THE VALUATION MODEL, AND ACCESSED THE COMPUTER SYSTEM WITHOUT AUTHORITY TO ALTER PRICING PARAMETERS ON VARIOUS OCCASIONS. THE MISMARKING ACTIVITIES, WHICH DID NOT APPLY TO OTHER BOOKS, RESULTED IN THE VALUE OF THE BOOK BEING INFLATED BY APPROXIMATELY US\$25 MILLION AND CAUSED THE ACTUAL LOSS IN THE BOOK TO BE WRONGLY REPORTED INTERNALLY. THE SFC FOUND THAT MLAPL AND MLFHKL DID NOT HAVE ADEQUATE INTERNAL CONTROLS PROCEDURES IN PLACE TO MANAGE THE RISKS ASSOCIATED WITH MISMARKING, IN THAT (I) THERE WAS UNCERTAINTY AS TO SUPERVISORY RESPONSIBILITIES OVER THE TRADER AND THE BOOK; (II) THE PRICE VERIFICATION MECHANISM APPLIED TO OTHER TRADING BOOKS WAS NOT APPLIED TO THE BOOK; (III) THERE WERE INADEQUATE CHECKS AND BALANCES OVER THE BOOK TO MITIGATE OPERATION RISKS INCLUDING RISKS ASSOCIATE WITH FRAUD AND DISHONEST ACTIVITIES; (IV) THERE WAS INSUFFICIENT SAFEGUARD OVER INFORMATION SECURITY AND INTEGRITY AS REGARDS THE BOOK; (V) TRADING AND VALUATION POLICIES WERE NOT SUFFICIENTLY IMPLEMENTED OVER THE BOOK; AND (IV) SENIOR MANAGEMENT FAILED TO ADEQUATELY MANAGE THE RISKS ASSOCIATED WITH THE BOOK.
Initiated By:	HONG KONG SECURITIES AND FUTURES COMMISSION (SFC)
Date Initiated:	03/03/2009
Docket/Case Number:	500/3N/703



Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	REPRIMAND
Resolution:	Decision
Resolution Date:	05/31/2010
Sanctions Ordered:	Monetary/Fine \$449,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE SFC FINED MLAPL AND MLFHKL HKD\$3,500,000 (USD449,000.00) FOR SYSTEMS AND CONTROLS FAILINGS ASSOCIATED WITH THE MISMARKING ACTIVITIES IN A TRADING BOOK.
Firm Statement	THE SFC FINED MLAPL AND MLFHKL HKD\$3,500,000 (USD 449,000.00) FOR SYSTEMS AND CONTROLS FAILINGS ASSOCIATED WITH THE MISMARKING ACTIVITIES IN A TRADING BOOK. MLAPL AND MLFHKL ACCEPTED THAT ITS SYSTEMS AND CONTROLS FELL SHORT OF THOSE EXPECTED IN RESPECT OF THE BOOK. THE SFC ACCEPTED THAT MLAPL'S AND MLFHKL'S MISCONDUCT WAS NOT INTENTIONAL AND MLAPL AND MLFHKL HAVE TAKEN REMEDIAL STEPS TO ADDRESS THE COMPLIANCE WEAKNESSES. IN DECIDING ON THE SANCTIONS, THE SFC TOOK INTO ACCOUNT MLAPL'S AND MLFHKL'S COOPERATION IN RESOLVING THE CASE.

Disclosure 5 of 39

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	ON APRIL 13, 2011, THE COMPTROLLER OF THE CURRENCY OF THE UNITED STATES OF AMERICA ("OCC") ISSUED A CEASE AND DESIST CONSENT ORDER ("ORDER") AGAINST BANK OF AMERICA, NATIONAL ASSOCIATION ("BANA"). THE ORDER IDENTIFIED CERTAIN DEFICIENCIES AND UNSAFE OR UNSOUND PRACTICES IN RESIDENTIAL MORTGAGE SERVICING AND IN BANA'S INITIATION AND HANDLING OF FORECLOSURE PROCEEDINGS. THE ORDER FINDS THAT IN CONNECTION WITH CERTAIN FORECLOSURES OF LOANS IN IT IS RESIDENTIAL SERVICING PORTFOLIO, BANA; (A) FILED OR CAUSED TO BE FILED IN COURTS EXECUTED AFFIDAVITS MAKING VARIOUS ASSERTIONS THAT WERE NOT BASED ON



THE AFFIANTS' PERSONAL KNOWLEDGE OR REVIEW OF RELEVANT BOOKS AND RECORDS; (B) FILED OR CAUSED TO BE FILED IN COURTS NUMEROUS AFFIDAVITS OR OTHER MORTGAGE-RELATED DOCUMENTS THAT WERE NOT PROPERLY NOTARIZED; (C) LITIGATED FORECLOSURE PROCEEDINGS AND INITIATED NON-JUDICIAL FORECLOSURE PROCEEDINGS WITHOUT ALWAYS ENSURING THAT THE PROMISSORY NOTE OR THE MORTGAGE DOCUMENT WERE PROPERLY ENDORSED OR ASSIGNED AND, IF NECESSARY, IN THE POSSESSION OF THE APPROPRIATE PARTY AT THE APPROPRIATE TIME; (D) FAILED TO DEVOTE SUFFICIENT RESOURCES TO ENSURE PROPER ADMINISTRATION OF ITS FORECLOSURE PROCESSES; (E) FAILED TO DEVOTE TO ITS FORECLOSURE PROCESSES ADEQUATE OVERSIGHT, INTERNAL CONTROLS, POLICIES AND PROCEDURES, COMPLIANCE RISK MANAGEMENT, INTERNAL AUDIT, THIRD PARTY MANAGEMENT AND TRAINING; AND (F) FAILED TO SUFFICIENTLY OVERSEE THIRD-PARTY PROVIDERS HANDING FORECLOSURE-RELATED SERVICES.

Initiated By:	THE COMPTROLLER OF THE CURRENCY OF THE UNITED STATES OF AMERICA
Date Initiated:	04/13/2011
Docket/Case Number:	AA-EC-11-12
Principal Product Type:	Other
Other Product Type(s):	RESIDENTIAL MORTGAGE LOAN SERVICING
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	REMEDIATION ACTIONS
Resolution:	Order
Resolution Date:	04/13/2011
Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	REMEDIATION ACTIONS
Sanction Details:	THE ORDER REQUIRES THAT BANA CEASE AND DESIST AND REQUIRES BANA'S BOARD TO MAINTAIN A COMPLIANCE COMMITTEE THAT IS RESPONSIBLE FOR MONITORING AND COORDINATING BANA'S COMPLIANCE WITH THE ORDER. THE ORDER PROVIDES FOR BANA TO: (A) SUBMIT A COMPREHENSIVE ACTION PLAN THAT INCLUDES A COMPLIANCE PROGRAM, THIRD-PARTY MANAGEMENT POLICIES AND PROCEDURES, CONTROLS AND OVERSIGHT OF BANA'S ACTIVITIES WITH RESPECT TO THE MORTGAGE ELECTRONIC REGISTRATION SYSTEM AND COMPLIANCE



WITH MERSCORP'S MEMBERSHIP RULES, TERMS, AND CONDITIONS; (B) RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT AN INDEPENDENT REVIEW OF RESIDENTIAL FORECLOSURE ACTIONS REGARDING INDIVIDUAL BORROWERS; (C) PLAN FOR OPERATION OF MANAGEMENT INFORMATION SYSTEMS; (D) SUBMIT A PLAN FOR EFFECTIVE COORDINATION OF COMMUNICATIONS WITH BORROWERS RELATED TO LOSS MITIGATION OR LOAN MODIFICATION AND FORECLOSURE ACTIVITIES; (E) CONDUCT AN ASSESSMENT OF BANA'S RISKS IN MORTGAGE SERVICING OPERATIONS; AND (F) SUBMIT PERIODIC WRITTEN PROGRESS REPORTS DETAILING THE FORM AND MANNER OF ALL ACTIONS TAKEN TO SECURE COMPLIANCE WITH THE ORDER.

Firm Statement

BANA SUBMITTED AN OFFER OF SETTLEMENT TO THE OCC. IN THE OFFER OF SETTLEMENT, BANA AGREED TO CONSENT TO THE ENTRY OF THE ORDER, WITHOUT ADMITTING OR DENYING ANY WRONGDOING. THE ORDER WAS ISSUED ON APRIL 13, 2011, AND MADE THE FINDINGS OF VIOLATIONS DESCRIBED ABOVE IN ITEM 7. THE SANCTIONS IMPOSED ARE EXPLAINED ABOVE IN ITEM 12.C.

Disclosure 6 of 39

Reporting Source:

Firm

Affiliate:

BANK OF AMERICA CORPORATION

Current Status:

Final

Allegations:

ON APRIL 13, 2011, THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM ("FEDERAL RESERVE") ISSUED A CEASE AND DESIST CONSENT ORDER ("CONSENT ORDER") AGAINST BANK OF AMERICA CORPORATION ("BAC"). THE CONSENT ORDER MAKES NO FINDING ON ANY ISSUES OF FACT OR LAW OR ANY EXPLICIT ALLEGATION CONCERNING BAC. THE CONSENT ORDER DESCRIBES A CONSENT ORDER THAT THE OFFICE OF THE COMPTROLLER OF THE CURRENCY ("OCC") AND BANK OF AMERICA, N.A. (THE "BANK"), WHICH IS OWNED AND CONTROLLED BY BAC, ENTERED INTO ADDRESSING AREAS OF WEAKNESS IDENTIFIED BY THE OCC IN MORTGAGE LOAN SERVICING, LOSS MITIGATION, FORECLOSURE ACTIVITIES, AND RELATED FUNCTIONS BY THE BANK. THE CONSENT ORDER ALSO STATES THAT THE OCC'S FINDINGS RAISED CONCERNS THAT BAC DID NOT ADEQUATELY ASSESS THE POTENTIAL RISKS ASSOCIATED WITH SUCH ACTIVITIES OF THE BANK. THE CONSENT ORDER DIRECTS THE BOARD OF DIRECTORS OF BAC TO TAKE APPROPRIATE STEPS TO ENSURE THAT THE BANK COMPLIES WITH THE OCC CONSENT ORDER.

Initiated By:

BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM



Date Initiated:	04/13/2011
Docket/Case Number:	11-029-B-HC
Principal Product Type:	Other
Other Product Type(s):	RESIDENTIAL MORTGAGE LOAN SERVICING
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	REMEDATION ACTIONS
Resolution:	Order
Resolution Date:	04/13/2011
Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	REMEDATION ACTIONS
Sanction Details:	THE CONSENT ORDER REQUIRES BAC AND ITS INSTITUTION-AFFILIATED PARTIES TO CEASE AND DESIST AND TAKE SPECIFIED AFFIRMATIVE ACTION, INCLUDING THAT BAC OR ITS BOARD: (1) TAKE STEPS TO ENSURE THE BANK COMPLIES WITH THE OCC ORDER; (2) SUBMIT WRITTEN PLANS TO STRENGTHEN THE BOARD'S OVERSIGHT OF RISK MANAGEMENT, INTERNAL AUDIT, AND COMPLIANCE PROGRAMS CONCERNING CERTAIN MORTGAGE LOAN SERVICING, LOSS MITIGATION, AND FORECLOSURE ACTIVITIES CONDUCTED THROUGH THE BANK; AND (3) PERIODICALLY SUBMIT WRITTEN PROGRESS REPORTS DETAILING THE FORM AND MANNER OF ALL ACTIONS TAKEN TO SECURE COMPLIANCE WITH THE CONSENT ORDER.
Firm Statement	BAC SUBMITTED AN OFFER OF SETTLEMENT TO THE FEDERAL RESERVE. IN THE OFFER OF SETTLEMENT, BAC AGREED TO CONSENT TO THE ENTRY OF THE CONSENT ORDER, WITHOUT THE CONSENT ORDER CONSTITUTING AN ADMISSION BY BAC OR ANY OF ITS SUBSIDIARIES OF ANY ALLEGATION MADE OR IMPLIED BY THE FEDERAL RESERVE IN CONNECTION WITH THE MATTER. THE CONSENT ORDER WAS ISSUED ON APRIL 13, 2011, THE HIGHLIGHTS OF WHICH ARE DESCRIBED ABOVE IN ITEM 7. THE SANCTIONS IMPOSED ARE EXPLAINED ABOVE IN ITEM 12.C.

Disclosure 7 of 39

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA CORPORATION
Current Status:	Final



Allegations:	THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM CONDUCTED A REVIEW CONCERNING VARIOUS TYPES OF ANTI-COMPETITIVE ACTIVITY BY CERTAIN BANK OF AMERICA CORPORATION (THE "BANK") EMPLOYEES IN CONJUNCTION WITH THE SALE OF CERTAIN DERIVATIVE FINANCIAL PRODUCTS TO MUNICIPALITIES AND NON-PROFIT ORGANIZATIONS VARIOUSLY BETWEEN 1998 AND 2003. FOLLOWING THE REVIEW, THE BANK AND THE RESERVE BANK ENTERED INTO A FORMAL WRITTEN AGREEMENT TO ENSURE THAT THE BANK PROACTIVELY AND APPROPRIATELY MANAGES ITS COMPLIANCE RISK RELATED TO CERTAIN COMPETITIVELY BID TRANSACTIONS.
Initiated By:	FEDERAL RESERVE BANK OF RICHMOND (THE "RESERVE BANK")
Date Initiated:	12/06/2010
Docket/Case Number:	10-240-WA/RB-HC
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Undertaking
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	12/06/2010
Sanctions Ordered:	
Other Sanctions Ordered:	UNDERTAKING TO ASSESS COMPLIANCE RISK PROGRAMS.
Sanction Details:	THE BANK HAS ENTERED INTO A WRITTEN AGREEMENT ON DECEMBER 6, 2010, WITH THE RESERVE BANK. UNDER THE TERMS OF THE WRITTEN AGREEMENT, THE BANK HAS AGREED TO SUBMIT A WRITTEN PLAN TO STRENGTHEN BOARD OVERSIGHT OF THE BANK'S COMPLIANCE RISK MANAGEMENT PROGRAM AS IT RELATES TO CERTAIN TYPES OF COMPETITIVELY BID TRANSACTIONS. IN ADDITION, THE BANK AGREED TO SUBMIT A WRITTEN PLAN TO STRENGTHEN THE BANK'S COMPLIANCE RISK MANAGEMENT PROGRAM REGARDING THOSE SAME COMPETITIVELY BID TRANSACTIONS, AND TO PROMPTLY IMPLEMENT THAT PLAN ONCE IT IS APPROVED BY THE RESERVE BANK.
Firm Statement	THE BANK HAS ENTERED INTO A WRITTEN AGREEMENT ON DECEMBER 6, 2010, WITH THE RESERVE BANK. UNDER THE TERMS OF THE WRITTEN AGREEMENT, THE BANK HAS AGREED TO SUBMIT A WRITTEN PLAN TO STRENGTHEN BOARD OVERSIGHT OF THE BANK'S COMPLIANCE RISK MANAGEMENT PROGRAM AS IT RELATES TO CERTAIN TYPES OF



COMPETITIVELY BID TRANSACTIONS. IN ADDITION, THE BANK AGREED TO SUBMIT A WRITTEN PLAN TO STRENGTHEN THE BANK'S COMPLIANCE RISK MANAGEMENT PROGRAM REGARDING THOSE SAME COMPETITIVELY BID TRANSACTIONS, AND TO PROMPTLY IMPLEMENT THAT PLAN ONCE IT IS APPROVED BY THE RESERVE BANK.

Disclosure 8 of 39

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA CORPORATION
Current Status:	Final
Allegations:	BANK OF AMERICA CORPORATION (THE "BANK") VIOLATED CERTAIN BIDDING REQUIREMENTS SET FORTH IN THE TREASURY REGULATIONS RELATED TO CERTAIN INVESTMENT CONTRACTS, AND ENTERED INTO CERTAIN INVESTMENT AND/OR SWAP CONTRACTS (OR PROVIDED BIDS TO ENTER INTO SUCH CONTRACTS) THAT DID NOT REFLECT THE FAIR MARKET VALUE OF THOSE CONTRACTS.
Initiated By:	INTERNAL REVENUE SERVICE ("IRS")
Date Initiated:	12/08/2010
Docket/Case Number:	NONE
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Restitution
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	12/08/2010
Sanctions Ordered:	Disgorgement/Restitution
Other Sanctions Ordered:	RESTITUTION IN THE AMOUNT OF \$25,000,000
Sanction Details:	ON DECEMBER 8, 2010, THE BANK ENTERED INTO A CLOSING AGREEMENT WITH THE IRS THAT ADDRESSED THE BANK'S VIOLATION OF CERTAIN BIDDING REQUIREMENTS SET FORTH IN THE TREASURY REGULATIONS RELATED TO CERTAIN INVESTMENT CONTRACTS, AND THE BANK'S ENTERING INTO CERTAIN INVESTMENT AND/OR SWAP CONTRACTS (OR PROVIDING BIDS TO ENTER INTO SUCH CONTRACTS) THAT DID NOT



REFLECT THE FAIR MARKET VALUE OF THOSE CONTRACTS. THE BANK AGREED TO PAY THE IRS \$25,000,000 AS RESTITUTION FOR ARBITRAGE REBATE PAYMENTS AND OTHER AMOUNTS THAT WOULD HAVE BEEN PAYABLE TO THE IRS AS A RESULT OF THE CONDUCT AND THE BANK RECEIVED A RELEASE RELATED TO ITS PARTICIPATION IN, BIDS FOR, OR STATEMENTS OR OMISSIONS RELATED TO ANY CONTRACTS THAT THE BANK BID ON FROM 1998 THROUGH 2006.

Firm Statement

ON DECEMBER 8, 2010, THE BANK ENTERED INTO A CLOSING AGREEMENT WITH THE IRS THAT ADDRESSED THE BANK'S VIOLATION OF CERTAIN BIDDING REQUIREMENTS SET FORTH IN THE TREASURY REGULATIONS RELATED TO CERTAIN INVESTMENT CONTRACTS, AND THE BANK'S ENTERING INTO CERTAIN INVESTMENT AND/OR SWAP CONTRACTS (OR PROVIDING BIDS TO ENTER INTO SUCH CONTRACTS) THAT DID NOT REFLECT THE FAIR MARKET VALUE OF THOSE CONTRACTS. THE BANK AGREED TO PAY THE IRS \$25,000,000 AS RESTITUTION FOR ARBITRAGE REBATE PAYMENTS AND OTHER AMOUNTS THAT WOULD HAVE BEEN PAYABLE TO THE IRS AS A RESULT OF THE CONDUCT AND THE BANK RECEIVED A RELEASE RELATED TO ITS PARTICIPATION IN, BIDS FOR, OR STATEMENTS OR OMISSIONS RELATED TO ANY CONTRACTS THAT THE BANK BID ON FROM 1998 THROUGH 2006.

Disclosure 9 of 39

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE COMPTROLLER OF THE CURRENCY (THE "COMPTROLLER") EXAMINED CERTAIN ACTIVITIES RELATED TO THE PARTICIPATION OF CERTAIN BANK OF AMERICA, NATIONAL ASSOCIATION (THE "BANK") EMPLOYEES IN THE SALE OF CERTAIN DERIVATIVE FINANCIAL PRODUCTS TO MUNICIPALITIES AND NON-PROFIT ORGANIZATIONS, AND REVIEWED INFORMATION INDICATING THAT CERTAIN BANK EMPLOYEES ENGAGED IN ILLEGAL BIDDING ACTIVITY RELATED TO THE SALE OF THOSE DERIVATIVE FINANCIAL PRODUCTS VARIOUSLY BETWEEN 1998 AND JANUARY 2004. FOLLOWING THE REVIEW, THE BANK AND THE COMPTROLLER ENTERED INTO A FORMAL WRITTEN AGREEMENT TO ENSURE THAT THE BANK PROACTIVELY AND APPROPRIATELY MANAGES ITS COMPLIANCE RISK RELATED TO VARIOUS COMPETITIVELY BID TRANSACTIONS, INCLUDING THOSE RELATED TO DERIVATIVE FINANCIAL PRODUCTS TO MUNICIPALITIES AND NON-PROFIT ORGANIZATIONS.
Initiated By:	THE OFFICE OF THE COMPTROLLER OF THE CURRENCY



Date Initiated:	12/07/2010
Docket/Case Number:	#2010-239
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Restitution
Other Sanction(s)/Relief Sought:	UNDERTAKING
Resolution:	Settled
Resolution Date:	12/07/2010
Sanctions Ordered:	Disgorgement/Restitution
Other Sanctions Ordered:	PAYMENT OF UNJUST ENRICHMENT IN THE AMOUNT OF \$9,217,218 AND UNDERTAKING
Sanction Details:	THE BANK HAS ENTERED INTO A WRITTEN AGREEMENT ON DECEMBER 7, 2010, WITH THE COMPTROLLER OF THE CURRENCY. UNDER THE TERMS OF THE WRITTEN AGREEMENT, THE BANK AGREED TO INSTITUTE AND/OR CONTINUE CERTAIN POLICIES AND PROCEDURES, INCLUDING COMPLIANCE, TRAINING AND AUDIT PROGRAMS, RELATING TO COMPETITIVELY BID TRANSACTIONS FOR THE SALE OF DERIVATIVE FINANCIAL PRODUCTS TO MUNICIPALITIES AND NON-PROFIT ORGANIZATIONS THAT ARE INTENDED TO INVEST OR RE-INVEST THE PROCEEDS OF BONDS ISSUED BY THESE ORGANIZATIONS OR TO MANAGE OR TRANSFER THE INTEREST RATES OF BONDS ISSUED BY THE ORGANIZATIONS. IN ADDITION, THE BANK AGREED TO DO A FORMAL ASSESSMENT OF ALL BUSINESS LINES THAT ENGAGE IN CERTAIN TYPES OF COMPETITIVELY BID TRANSACTIONS, TO COMPLETE A FORMAL EVALUATION OF THE OPERATIONAL POLICIES AND PROCEDURES APPLICABLE TO SUCH BUSINESSES TO ENSURE THAT ADEQUATE POLICIES AND PROCEDURES EXIST TO ENSURE COMPLIANCE WITH SAFE AND SOUND BANKING PRACTICES, LAW, AND REGULATIONS RELATED TO THE COMPETITIVELY BID TRANSACTIONS, AND TO DEVELOP AN INTERNAL TRAINING PROGRAM TO ENSURE COMPLIANCE WITH ALL LAWS AND REGULATIONS RELATED TO COMPETITIVELY BID TRANSACTIONS. UPON APPROVAL BY THE COMPTROLLER, THE BANK MUST IMMEDIATELY BEGIN TO IMPLEMENT THE POLICIES, PROCEDURES AND PROGRAMS CALLED FOR BY THE AGREEMENT. FINALLY, THE BANK AGREED TO PAY UNJUST ENRICHMENT IN THE AMOUNT OF \$9,217,218 TO CERTAIN COUNTERPARTIES IDENTIFIED BY THE COMPTROLLER.
Firm Statement	THE BANK HAS ENTERED INTO A WRITTEN AGREEMENT ON DECEMBER 7,



2010, WITH THE COMPTROLLER OF THE CURRENCY. UNDER THE TERMS OF THE WRITTEN AGREEMENT, THE BANK AGREED TO INSTITUTE AND/OR CONTINUE CERTAIN POLICIES AND PROCEDURES, INCLUDING COMPLIANCE, TRAINING AND AUDIT PROGRAMS, RELATING TO COMPETITIVELY BID TRANSACTIONS FOR THE SALE OF DERIVATIVE FINANCIAL PRODUCTS TO MUNICIPALITIES AND NON-PROFIT ORGANIZATIONS THAT ARE INTENDED TO INVEST OR RE-INVEST THE PROCEEDS OF BONDS ISSUED BY THESE ORGANIZATIONS OR TO MANAGE OR TRANSFER THE INTEREST RATES OF BONDS ISSUED BY THE ORGANIZATIONS. IN ADDITION, THE BANK AGREED TO DO A FORMAL ASSESSMENT OF ALL BUSINESS LINES THAT ENGAGE IN CERTAIN TYPES OF COMPETITIVELY BID TRANSACTIONS, TO COMPLETE A FORMAL EVALUATION OF THE OPERATIONAL POLICIES AND PROCEDURES APPLICABLE TO SUCH BUSINESSES TO ENSURE THAT ADEQUATE POLICIES AND PROCEDURES EXIST TO ENSURE COMPLIANCE WITH SAFE AND SOUND BANKING PRACTICES, LAW, AND REGULATIONS RELATED TO THE COMPETITIVELY BID TRANSACTIONS, AND TO DEVELOP AN INTERNAL TRAINING PROGRAM TO ENSURE COMPLIANCE WITH ALL LAWS AND REGULATIONS RELATED TO COMPETITIVELY BID TRANSACTIONS. UPON APPROVAL BY THE COMPTROLLER, THE BANK MUST IMMEDIATELY BEGIN TO IMPLEMENT THE POLICIES, PROCEDURES AND PROGRAMS CALLED FOR BY THE AGREEMENT. FINALLY, THE BANK AGREED TO PAY UNJUST ENRICHMENT IN THE AMOUNT OF \$9,217,218 TO CERTAIN COUNTERPARTIES IDENTIFIED BY THE COMPTROLLER.

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Reporting Source:	Firm
Affiliate:	SOUTHMARK PROPERTIES; THE CITIZENS AND SOUTHERN NATIONAL BANK (NKA BANK OF AMERICA, NATIONAL ASSOCIATION)
Current Status:	Final
Allegations:	SEC ALLEGED THAT PUBLIC DISCLOSURE BY THE CITIENS AND SOUTHERN NATIONAL BANK (NKA BANK OF AMERICA, NATIONAL ASSOCIATION) (THE "GEORGIA BANK") CONTAINED UNTURE STATEMENTS OF MATERIAL FACTS OR FAILED TO DISCLOSE MATERIAL FACTS NECESSARY IN ORDER TO MAKE THE STATEMENTS MISLEADING.
Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	12/01/1977
Docket/Case Number:	N/A
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: Consent

Resolution Date: 12/01/1977

Sanctions Ordered: Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: INJUNCTION ACTION - CONSENT AND UNDERTAKING

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATION OF THE COMPLAINT AND IN ORDER TO AVOID LENGTHY LITIGATION, THE GEORGIA BANK ENTERED INTO A CONSENT SETTLEMENT OF THE INJUNCTION ACTION. THIS INCLUDED A CONSENT AND UNDERTAKING TO ESTABLISH AN ACQUISITION COMMITTEE OF THE BOARD OF DIRECTORS TO PERFORM CERTAIN FUNCTIONS RELATING TO ANY FUTURE ACQUISITIONS OF CORRESPONDENT ASSOCIATE BANKS, TO ESTABLISH A SPECIAL REVIEW SUB COMMITTEE OF THE BOARD'S CREDIT COMMITTEE TO REVIEW CERTAIN CREDIT TRANSACTIONS WITH DIRECTORS AND SENIOR OFFICERS, AND TO DISCLOSE INFORMATION ABOUT RELATIONSHIPS WITH CORRESPONDENT ASSOCIATE BANKS AND CERTAIN ACQUISITIONS IN 1975. ON JULY 27, 1984, THE COURT REMOVED THE CONSENT AND UNDERTAKING AND ONLY THE PERMANENT INJUNCTION REMAINS IN EFFECT.

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Reporting Source: Firm

Affiliate: FLEET FINANCIAL GROUP, INC. (PREDECESSOR TO FLEETBOSTON FINANCIAL CORPORATION - NOW KNOWN AS BANK OF AMERICA CORPORATION)

Current Status: Final

Allegations: PRIOR TO ITS AFFILIATION WITH FLEET, SHAWMUT BANK OF BOSTON, N.A., ACCEPTED AN AGREEMENT IN 1983 WITH THE OFFICE OF THE COMPTROLLER OF THE CURRENCY THAT TEMPORARILY AND PARTIALLY RESTRICTED THE EXPANSION OF SHAWNMUT'S TRANSFER AGENT SERVICING OPERATION.

Initiated By: OFFICE OF THE COMPTROLLER OF CURRENCY



Date Initiated:	01/01/1983
Docket/Case Number:	N/A
Principal Product Type:	Other
Other Product Type(s):	TRANSFER AGENT SERVICES
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	AGREEMENT WAS TERMINATED
Resolution:	Other
Resolution Date:	06/30/1984
Sanctions Ordered:	
Other Sanctions Ordered:	N/A
Sanction Details:	PRIOR TO ITS AFFILIATION WITH FLEET, SHAWMUT BANK OF BOSTON, N.A., ACCEPTED AN AGREEMENT IN 1983 WITH THE OFFICE OF THE COMPTROLLER OF THE CURRENCY THAT TEMPORARILY AND PARTIALLY RESTRICTED THE EXPANSION OF SHAWMUT'S TRANSFER AGENT SERVICING OPERATION. THE AGREEMENT WAS TERMINATED, REMOVING RESTRICTION IN 1984. FLEET FINANCIAL GROUP MERGED WITH SHAWMUT NATIONAL CORPORATION IN 1995.
Firm Statement	PRIOR TO ITS AFFILIATION WITH FLEET, SHAWMUT BANK OF BOSTON, N.A., ACCEPTED AN AGREEMENT IN 1983 WITH THE OFFICE OF THE COMPTROLLER OF THE CURRENCY THAT TEMPORARILY AND PARTIALLY RESTRICTED THE EXPANSION OF SHAWMUT'S TRANSFER AGENT SERVICING OPERATION. THE AGREEMENT WAS TERMINATED, REMOVING RESTRICTION IN 1984. FLEET FINANCIAL GROUP MERGED WITH SHAWMUT NATIONAL CORPORATION IN 1995.

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Reporting Source:	Firm
Affiliate:	FLEET FINANCIAL GROUP, INC. (PREDECESSOR TO FLEETBOSTON FINANCIAL CORPORATION-NOW KNOWN AS BANK OF AMERICA CORPORATION)
Current Status:	Final
Allegations:	NORSTAR BANCORP, INC., THE PREDECESSOR OF FLEET FINANCIAL GROUP, VOLUNTARILY BROUGHT TO THE ATTENTION OF THE TREASURY DEPARTMENT NUMEROUS VIOLATIONS OF THE BANK SECRECY ACT FOR FAILURE TO REPORT CURRENCY TRANSACTIONS BETWEEN 1980 AND



1985 BY THREE BANK SUBSIDIARIES.

Initiated By: U.S. DEPARTMENT OF TREASURY

Date Initiated: 01/01/1985

Docket/Case Number: N/A

Principal Product Type: Other

Other Product Type(s): CURRENCY TRANSACTIONS

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

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 12/30/1985

Sanctions Ordered: Monetary/Fine \$269,904.00

Other Sanctions Ordered:

Sanction Details: TREASURY DEPARTMENT ASSESSED AGAINST NORSTAR A CIVIL PENALTY OF \$269,904 IN COMPLETE SETTLEMENT OF NORSTAR'S CIVIL LIABILITY FOR VIOLATIONS BY THREE BANK SUBSIDIARIES.

Disclosure 13 of 39

Reporting Source: Firm

Affiliate: STEIN ROE & FARNHAM INCORPORATED (NKA BOFA ADVISORS, LLC)

Current Status: Final

Allegations: THE SEC ALLEGED THAT STEIN ROE & FARNHAM INCORPORATED (NKA BOFA ADVISORS, LLC) VIOLATED SECTION 203(E)(5) OF THE INVESTMENT ADVISERS ACT ("ACT") WITH A VIEW TO PREVENTING VIOLATIONS OF SECTION 206 OF THE ACT AND SECTION 10(B) OF THE SECURITIES EXCHANGE ACT AND RULE 10B-5 THEREUNDER.

Initiated By: SECURITIES AND EXCHANGE COMMISSION

Date Initiated: 09/25/1986

Docket/Case Number: ADMIN. PROCEEDING FILE NO. 3-6733

Principal Product Type: Other

Other Product Type(s): PRIVATE ACCOUNTS



Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	STEIN ROE & FARNHAM INCORPORATED (NKA BOFA ADVISORS, LLC) WAS REQUIRED TO OBTAIN AN INDEPENDENT CONSULTANT TO MAKE RECOMMENDATIONS CONCERNING THE ADMINISTRATION OF ITS INVESTMENT ADVISER OPERATIONS.
Resolution:	Consent
Resolution Date:	09/25/1986
Sanctions Ordered:	Censure
Other Sanctions Ordered:	
Sanction Details:	STEIN ROE & FARNHAM INCORPORATED (NKA BOFA ADVISORS, LLC) WAS REQUIRED TO OBTAIN AN INDEPENDENT CONSULTANT TO MAKE RECOMMENDATIONS CONCERNING THE ADMINISTRATION OF ITS INVESTMENT ADVISER OPERATIONS.

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA NT & SA
Current Status:	Final
Allegations:	VIOLETION OF BOOKS AND RECORDKEEPING PROVISIONS AS WELL AS OTHER PROVISIONS OF THE U.S. SECURITIES LAWS.
Initiated By:	OFFICE OF THE COMPTROLLER OF CURRENCY
Date Initiated:	07/23/1987
Docket/Case Number:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	07/01/1987



Sanctions Ordered:	Censure
Other Sanctions Ordered:	
Sanction Details:	BOFA WAS SANCTIONED BY THE OCC. PURSUANT TO THE ORDER, BOFA WAS CENSURED, TWO BOFA OFFICERS WERE SUSPENDED FOR SEVERAL DAYS AND BOFA WAS DIRECTED TO ADOPT CERTAIN POLICIES AND PROCEDURES AND TO CREATE A COMPLIANCE REVIEW COMMITTEE. THE ORDER WAS LIFTED IN 1991.
Firm Statement	BOFA WAS SANCTIONED BY THE OCC DUE TO PROBLEMS ASSOCIATED WITH AN ATTEMPTED CONVERSION TO A NEW SECURITIES TRADE PROCESSING & RECORD-KEEPING SYSTEM. THE OCC FOUND THAT DUE TO SYSTEMS PROBLEMS, BOFA VIOLATED BOOKS & RECORD-KEEPING PROVISIONS AS WELL AS OTHER PROVISIONS OF THE U.S. SECURITIES LAWS. THE ORDER WAS LIFTED IN 1991.

Disclosure 15 of 39

Reporting Source:	Firm
Affiliate:	STEIN ROE & FARNHAM INCORPORATED (NKA BOFA ADVISORS, LLC)
Current Status:	Final
Allegations:	THE SEC ALLEGED THAT STEIN ROE & FARNHAM INCORPORATED (NKA BOFA ADVISORS, LLC) VIOLATED SECTION 17(E)(1) OF THE INVESTMENT COMPANY ACT ALLEGING THAT COMPENSATION WAS RECEIVED FOR THE PURCHASE AND SALE OF PROPERTY TO OR FOR THE ACCOUNTS OF SEVERAL INVESTMENT COMPANIES WHICH WERE ADVISED BY STEIN ROE.
Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	01/09/1990
Docket/Case Number:	ADMIN. PROCEEDING FILE NO. 3-7303
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	PRIVATE ADVISORY ACCOUNTS
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	STEIN ROE & FARNHAM INCORPORATED (NKA BOFA ADVISORS, LLC) WAS REQUIRED TO COMPLY WITH AN UNDERTAKING TO ESTABLISH CERTAIN PROCEDURES REGARDING TRANSACTIONS INVOLVING INVESTMENT COMPANY ASSETS.
Resolution:	Consent



Resolution Date: 01/09/1990

Sanctions Ordered: Censure

Other Sanctions Ordered:

Sanction Details: STEIN ROE & FARNHAM INCORPORATED (NKA BOFA ADVISORS, LLC) WAS REQUIRED TO COMPLY WITH AN UNDERTAKING TO ESTABLISH CERTAIN PROCEDURES REGARDING TRANSACTIONS INVOLVING INVESTMENT COMPANY ASSETS.

Disclosure 16 of 39

Reporting Source: Firm

Affiliate: NCNB TEXAS SECURITIES, INC. (FORMERLY FIRST REPUBLIC BANK SECURITIES COMPANY)

Current Status: Final

Allegations: THE ALLEGATION ALLEGES THAT THE CONTROL AFFILIATE FILED THEIR FOCUS PART 1 REPORT FOR THE MONTH OF JULY ONE BUSINESS DAY LATE.

Initiated By: NASD

Date Initiated: 03/30/1990

Docket/Case Number:

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: LETTER OF AWC

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 03/30/1990

Sanctions Ordered: Monetary/Fine \$250.00

Other Sanctions Ordered:

Sanction Details: ENTERED INTO A LETTER OF ACCEPTANCE, WAIVER AND CONSENT WITH THE NASD AND PAID A \$250 FINE.

Firm Statement ENTERED INTO A LETTER OF ACCEPTANCE, WAIVER AND CONSENT WITH THE NASD AND PAID A \$250 FINE.



Disclosure 17 of 39

Reporting Source:	Firm
Affiliate:	FIRST NATIONAL BANK OF BOSTON
Current Status:	Final
Allegations:	THAT FNBB, IN CONNECTION WITH ITS CORPORATE TRUST BUSINESS, HAD VIOLATED CERTAIN RECORDKEEPING AND CUSTOMER RESPONSE PROVISIONS OF THE SEC'S TRANSFER AGENT REGULATIONS.
Initiated By:	OFFICE OF THE COMPTROLLER OF CURRENCY
Date Initiated:	12/31/1990
Docket/Case Number:	AA-SCP-92-110
Principal Product Type:	Other
Other Product Type(s):	TRANSFER AGENT SERVICES
Principal Sanction(s)/Relief Sought:	Undertaking
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	12/30/1990
Sanctions Ordered:	
Other Sanctions Ordered:	N/A
Sanction Details:	THE COMPTROLLER ACCEPTED FNBB'S OFFER OF SETTLEMENT, UNDER WHICH FNBB CONSENTED TO THE COMPTROLLER'S ISSUANCE OF AN ORDER FINDING THAT FNBB HAD WILLFULLY VIOLATED CERTAIN RECORDKEEPING AND CUSTOMER RESPONSE PROVISIONS OF THE SEC'S TRANSFER AGENT REGULATIONS AND IMPOSING REMEDIAL MEASURES DESIGNED TO PREVENT THE RECURRENCE OF THE ALLEGED VIOLATIONS.
Firm Statement	THE COMPTROLLER TERMINATED ITS CONSENT ORDER ON MAY 1, 1992, FOLLOWING AN EXAMINATION IN WHICH IT DETERMINED THAT FNBB HAS SATISFACTORILY COMPLETED THE REQUIRED REMEDIAL ACTIONS.

Disclosure 18 of 39

Reporting Source: Firm



Affiliate: FLEET INVESTMENT ADVISORS, INC. (NKA BOFA ADVISORS, LLC)

Current Status: Final

Allegations: ADMINISTRATIVE PROCEEDING BY PENNSYLVANIA SECURITIES COMMISSION REGARDING APPLICATION FOR REGISTRATION AS INVESTMENT ADVISOR. FIA (NKA BOFA ADVISORS, LLC) FAILED TO RESPOND TO WRITTEN REQUESTS AND A RELATED ORDER TO SUPPLY CERTAIN INFORMATION TO COMPLETE ITS APPLICATION. NO DAMAGES WERE ALLEGED.

Initiated By: PENNSYLVANIA SECURITIES COMMISSION

Date Initiated: 02/01/1991

Docket/Case Number: N/A

Principal Product Type: Other

Other Product Type(s): ADVISORY SERVICES

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: APPLICATION DENIED

Resolution: Decision

Resolution Date: 02/05/1998

Sanctions Ordered: Revocation/Expulsion/Denial

Other Sanctions Ordered:

Sanction Details: APPLICATION DENIED. NO PENALTIES, FINES OR OTHER PAYMENTS WERE ASSESSED.

Disclosure 19 of 39

Reporting Source: Firm

Affiliate: CONTINENTAL BANK, N.A. (NKA BANK OF AMERICA ILLINOIS)

Current Status: Final

Allegations: VIOLATION OF CERTAIN RECORDKEEPING REQUIREMENTS UNDER THE UNITED STATES GOVERNMENT SECURITIES ACT AND COMPTROLLER'S RULES.

Initiated By: COMPTROLLER OF THE CURRENCY

Date Initiated: 01/01/1992

**Docket/Case Number:****Principal Product Type:** No Product**Other Product Type(s):****Principal Sanction(s)/Relief Sought:** Cease and Desist**Other Sanction(s)/Relief Sought:****Resolution:** Settled**Resolution Date:** 01/01/1992**Sanctions Ordered:** Monetary/Fine \$200,000.00
Cease and Desist/Injunction**Other Sanctions Ordered:****Sanction Details:** CEASE AND DESIST ORDER AND \$100,000 FINE TO BANK OF AMERICA NT&SA; CEASE AND DESIST ORDER AND \$100,000 FINE TO CONTINENTAL BANK N.A.

Firm Statement

IN JANUARY 1992, AS PART OF AN INDUSTRY-WIDE RESOLUTION OF AN INVESTIGATION OF CERTAIN MARKET PRACTICES FOR THE UNITED STATES GOVERNMENT SPONSORED ENTERPRISE SECURITIES, THE COMPTROLLER ISSUED CEASE AND DESIST ORDER TO BOFA, CBNA, AND APPROXIMATELY 100 OTHER SECURITIES DEALERS (INCLUDING OTHER BANKS) REQUIRING THESE ENTITIES TO CEASE AND DESIST FROM FURTHER VIOLATIONS OF CERTAIN RECORD-KEEPING REQUIREMENTS UNDER THE UNITED STATES GOVERNMENT SECURITIES ACT AND THE COMPTROLLER'S RULES AND TO PAY CIVIL MONEY PENALTIES. WITHOUT ADMITTING OR DENYING, THE COMPTROLLER'S FINDINGS, BOFA AGREED TO PAY A FINE IN THE AMOUNT OF \$100,000. CBNA, WHICH BECAME A WHOLLY OWNED SUBSIDIARY OF BANKAMERICA CORPORATION IN SEPTEMBER 1994, AGREED TO PAY A FINE IN THE AMOUNT OF \$100,000.

Reporting Source: Firm**Affiliate:** BANK OF AMERICA NT & SA**Current Status:** Final**Allegations:** VIOLATION OF CERTAIN RECORDKEEPING REQUIREMENTS UNDER THE UNITED STATES GOVERNMENT SECURITIES ACT AND COMPTROLLER'S RULES.**Initiated By:** COMPTROLLER OF THE CURRENCY



Date Initiated:	01/01/1992
Docket/Case Number:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	01/01/1992
Sanctions Ordered:	Monetary/Fine \$200,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	CEASE AND DESIST ORDER AND \$100,000 FINE TO BANK OF AMERICA NT&SA; CEASE AND DESIST ORDER AND \$100,000 FINE TO CONTINENTIAL BANK N.A.
Firm Statement	IN JANUARY 1992, AS PART OF AN INDUSTRY-WIDE RESOLUTION OF AN INVESTIGATION OF CERTAIN MARKET PRACTICES FOR THE UNITED STATES GOVERNMENT SPONSORED ENTERPRISE SECURITIES, THE COMPTROLLER ISSUED CEASE AND DESIST ORDER TO BOFA, CBNA, AND APPROXIMATELY 100 OTHER SECURITIES DEALERS (INCLUDING OTHER BANKS) REQUIRING THESE ENTITIES TO CEASE AND DESIST FROM FURTHER VIOLATIONS OF CERTAIN RECORD-KEEPING REQUIREMENTS UNDER THE UNITED STATES GOVERNMENT SECURITIES ACT AND THE COMPTROLLER'S RULES AND TO PAY CIVIL MONEY PENALTIES. WITHOUT ADMITTING OR DENYING, THE COMPTROLLER'S FINDINGS, BOFA AGREED TO PAY A FINE IN THE AMOUNT OF \$100,000. CBNA, WHICH BECAME A WHOLLY OWNED SUBSIDIARY OF BANKAMERICA CORPORATION IN SEPTEMBER 1994, AGREED TO PAY A FINE IN THE AMOUNT OF \$100,000.

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Reporting Source:	Firm
Affiliate:	BANKAMERICA NATIONAL TRUST CO. (FORMERLY SECURITY PACIFIC NATIONAL TRUST CO.)
Current Status:	Final



Allegations:	ALLEGATIONS INVOLVED CERTAIN SECURITIES LENDING ACTIVITIES OF BANKAMERICA NATIONAL TRUST CO. (FORMERLY SECURITY PACIFIC NATIONAL TRUST CO. (SPNT CO.))AND RELATED ACTIVITIES.
Initiated By:	COMPTROLLER OF THE CURRENCY
Date Initiated:	04/01/1992
Docket/Case Number:	
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:	Consent
Resolution Date:	04/01/1992
Sanctions Ordered:	Monetary/Fine \$521,823.00 Cease and Desist/Injunction
Other Sanctions Ordered:	N/A
Sanction Details:	THIS DISCLOSURE CONCERNS SPNT CO. AND RELATED ENTITIES THAT CEASED TO EXIST AFTER THEY WERE MERGED INTO BANKAMERICA CORPORATION.
Firm Statement	THIS DISCLOSURE CONCERNS SPNT CO. AND RELATED ENTITIES THAT CEASED TO EXIST AFTER THEY WERE MERGED INTO BANKAMERICA CORPORATION.

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Reporting Source:	Firm
Affiliate:	BANKAMERICA NATIONAL TRUST CO. (FORMERLY SECURITY PACIFIC NATIONAL TRUST CO.)
Current Status:	Final
Allegations:	ALLEGATIONS INVOLVED CERTAIN SECURITIES LENDING ACTIVITIES OF BANKAMERICA NATIONAL TRUST CO. (FORMERLY SECURITY PACIFIC NATIONAL TRUST CO. (SPNT CO.))AND RELATED ACTIVITIES.
Initiated By:	FEDERAL RESERVE BOARD
Date Initiated:	04/01/1992

**Docket/Case Number:****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:** Consent**Resolution Date:** 04/01/1992**Sanctions Ordered:** Monetary/Fine \$521,823.00
Cease and Desist/Injunction**Other Sanctions Ordered:** N/A**Sanction Details:** THIS DISCLOSURE CONCERNS SPNT CO. AND RELATED ENTITIES THAT CEASED TO EXIST AFTER THEY WERE MERGED INTO BANKAMERICA CORPORATION.**Firm Statement** THIS DISCLOSURE CONCERNS SPNT CO. AND RELATED ENTITIES THAT CEASED TO EXIST AFTER THEY WERE MERGED INTO BANKAMERICA CORPORATION.**Disclosure 22 of 39****Reporting Source:** Firm**Affiliate:** BANKAMERICA NATIONAL TRUST CO. (FORMERLY SECURITY PACIFIC NATIONAL TRUST CO.)**Current Status:** Final**Allegations:** ALLEGATIONS INVOLVED CERTAIN SECURITIES LENDING ACTIVITIES OF BANKAMERICA NATIONAL TRUST CO. (FORMERLY SECURITY PACIFIC NATIONAL TRUST CO. (SPNT CO.))AND RELATED ACTIVITIES.**Initiated By:** IRS**Date Initiated:** 04/01/1992**Docket/Case Number:****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:	Consent
Resolution Date:	04/01/1992
Sanctions Ordered:	Monetary/Fine \$521,823.00 Cease and Desist/Injunction
Other Sanctions Ordered:	N/A
Sanction Details:	THIS DISCLOSURE CONCERNS SPNT CO. AND RELATED ENTITIES THAT CEASED TO EXIST AFTER THEY WERE MERGED INTO BANKAMERICA CORPORATION.
Firm Statement	THIS DISCLOSURE CONCERNS SPNT CO. AND RELATED ENTITIES THAT CEASED TO EXIST AFTER THEY WERE MERGED INTO BANKAMERICA CORPORATION.

Disclosure 23 of 39

Reporting Source:	Firm
Affiliate:	BANK OF BOSTON CORPORATION (N/K/A BANK OF AMERICA CORPORATION)
Current Status:	Final
Allegations:	THAT CERTAIN ASPECTS OF THE MANAGEMENT DISCUSSION AND ANALYSIS PORTION OF BANK OF BOSTON CORPORATION'S 10-Q FOR THE 2ND QUARTER OF 1989 DID NOT COMPLY WITH SECTION 13(A) OF THE SECURITIES EXCHANGE ACT OF 1934 (THE "EXCHANGE ACT").
Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	01/11/1994
Docket/Case Number:	ADMIN. PROCEEDING FILING NO. 3-8270
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	



Resolution:	Order
Resolution Date:	02/26/1996
Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	BANK OF BOSTON CORPORATION WAS ORDERED TO CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 13(A) OF THE EXCHANGE ACT AND RULES 12B-20 AND 13A-13 THEREUNDER.
Sanction Details:	BANK OF BOSTON CORPORATION WAS ORDERED TO CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 13(A) OF THE EXCHANGE ACT AND RULES 12B-20 AND 13A-13 THEREUNDER.
Firm Statement	BANK OF BOSTON CORPORATION WAS ORDERED TO CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 13(A) OF THE EXCHANGE ACT AND RULES 12B-20 AND 13A-13 THEREUNDER.

Disclosure 24 of 39

Reporting Source:	Firm
Affiliate:	BOFA ADVISORS, LLC (FKA COLONIAL MANAGEMENT ASSOCIATES, INC.)
Current Status:	Final
Allegations:	THE SEC ALLEGED THAT COLONIAL MANAGEMENT ASSOCIATES, INC. (NKA BOFA ADVISORS, LLC) VIOLATED SECTIONS 15(C)(3) AND 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 AND RULES 15C3-1, 17A-3(A)(11) AND 17A-11(A)(1) PROMULGATED THEREUNDER BY (1) FAILING TO TIMELY CALCULATE ITS NET CAPITAL ON A MONTHLY BASIS DURING A LIMITED PERIOD OF TIME, (2) FAILING TO MAINTAIN THE REQUIRED RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL DURING A LIMITED PERIOD OF TIME, AND (3) FAILING TO PROVIDE TELEGRAPHIC NOTICE OF ITS NET CAPITAL DEFICIENCY ON THE DATE IT OCCURRED.
Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	06/15/1994
Docket/Case Number:	ADMIN. PROCEEDING FILE NO. 3-8397
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist



Other Sanction(s)/Relief Sought:	COLONIAL MANAGEMENT ASSOCIATES, INC. (NKA COLUMBIA MANAGEMENT ADVISORS, INC.) WAS ORDERED TO PAY A \$50,000 CIVIL PENALTY.
Resolution:	Order
Resolution Date:	06/15/1994
Sanctions Ordered:	Monetary/Fine \$50,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	CIVIL PENALTY WAS PAID BY COLONIAL MANAGEMENT ASSOCIATES, INC. (NKA BOFA ADVISORS, LLC) ON OR ABOUT JUNE 21, 1994.

Disclosure 25 of 39

Reporting Source:	Firm
Affiliate:	SEATTLE FIRST NATIONAL BANK
Current Status:	Final
Allegations:	VIOLATION OF SECTION 17(F)(1) OF THE SECURITIES AND EXCHANGE ACT OF 1934 AND RULE 17(F)(1), PROMULGATED THEREUNDER.
Initiated By:	COMPTROLLER OF THE CURRENCY
Date Initiated:	06/30/1994
Docket/Case Number:	EA-94-4
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	07/05/1994
Sanctions Ordered:	Monetary/Fine \$75,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE MATTERS ASSERTED THEREIN,



SEATTLE-FIRST NATIONAL BANK ("SEAFIRST") A WHOLLY OWNED SUBSIDIARY OF SEAFIRST CORPORATION AND BANKAMERICA CORPORATION ENTERED INTO A JOINT CONSENT CEASE AND DESIST ORDER WITH THE SEC AND THE OCC. THE ORDER FOUND THAT SEAFIRST VIOLATED SECTIONS 17F1 OF THE SECURITIES EXCHANGE ACT OF '34 AND RULE 17F1 PROMULGATED THEREUNDER, PROHIBITED VIOLATIONS IN THE FUTURE, AND REQUIRED SEAFIRST TO PAY A CIVIL MONEY PENALTY OF \$75,000.

Firm Statement

THE MATTER AROSE OUT THEFTS FROM A COURIER SERVICE OF SECURITIES SHIPPED BY SEAFIRST IN DEC '92. THE SEC AND OCC FOUND THAT SEAFIRST FAILED TO CONFIRM RECEIPT OF THE SECURITIES BEING DELIVERED AFTER THEY WERE NOT PAID WITHIN 10 DAYS AND FAILED TO REPORT THE LOSS OF SUCH SECURITIES.

Disclosure 26 of 39

Reporting Source:	Firm
Affiliate:	SEATTLE FIRST NATIONAL BANK
Current Status:	Final
Allegations:	VIOLATION OF SECTION 17(F)(1) OF THE SECURITIES AND EXCHANGE ACT OF 1934 AND RULE 17F1, PROMULGATED THEREUNDER.
Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	07/01/1994
Docket/Case Number:	3-9409
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	07/05/1994
Sanctions Ordered:	Monetary/Fine \$75,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE MATTERS ASSERTED THEREIN,



SEATTLE-FIRST NATIONAL BANK ("SEAFIRST") A WHOLLY OWNED SUBSIDIARY OF SEAFIRST CORPORATION AND BANKAMERICA CORPORATION ENTERED INTO A JOINT CONSENT CEASE AND DESIST ORDER WITH THE SEC AND THE OCC. THE ORDER FOUND THAT SEAFIRST VIOLATED SECTIONS 17F1 OF THE SECURITIES EXCHANGE ACT OF '34 AND RULE 17F1 PROMULGATED THEREUNDER, PROHIBITED VIOLATIONS IN THE FUTURE, AND REQUIRED SEAFIRST TO PAY A CIVIL MONEY PENALTY OF \$75,000.

Firm Statement

THE MATTER AROSE OUT THEFTS FROM A COURIER SERVICE OF SECURITIES SHIPPED BY SEAFIRST IN DEC '92. THE SEC AND OCC FOUND THAT SEAFIRST FAILED TO CONFIRM RECEIPT OF THE SECURITIES BEING DELIVERED AFTER THEY WERE NOT PAID WITHIN 10 DAYS AND FAILED TO REPORT THE LOSS OF SUCH SECURITIES.

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Reporting Source:	Firm
Affiliate:	NATIONSBANK, N.A. (NKA BANK OF AMERICA, N.A)
Current Status:	Final
Allegations:	ALLEGED THAT NATIONSBANK, N.A. (NKA BANK OF AMERICA, N.A.) WAS A CAUSE OF NATIONSSECURITIES'(NKA BANC OF AMERICA SECURITIES LLC), A FORMER AFFILIATE BROKER/DEALER, VIOLATION OF SECTION 17(A)(2) & (3) OF THE SECURITIES ACT IN REGARDS TO SUPERVISING REGISTERED REPRESENTATIVES IN ASSOCIATION WITH THE INITIAL PUBLIC OFFERING OF SHARES OF THE NATIONSL GOVERNMENT INCOME TERM TRUST 2003, INC. AND NATIONS FOVERNMENT INCOME TERM TRUST 2004, INC.
Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	05/04/1998
Docket/Case Number:	3-9596
Principal Product Type:	Unit Investment Trust(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Consent



Resolution Date: 05/04/1998

Sanctions Ordered: Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, NATIONSBANK, N.A. (NKA BANK OF AMERICA, N.A.) CONSENTED TO AN ORDER TO CEASE AND DESIST FROM COMMITTING OR CAUSING VIOLATIONS OF SECTION 17 (A)(2) AND (3) OF THE SECURITIES ACT.

Disclosure 28 of 39

Reporting Source: Firm

Affiliate: NATIONSBANK, N.A. (NKA BANK OF AMERICA, N.A.)

Current Status: Final

Allegations: OCC FOUND THAT NATIONSBANK, N.A. (N.K.A. BANK OF AMERICA, N.A.) VIOLATED A CONDITION IN AN OCC APPROVAL LETTER AND THEREBY FAILED TO ADHERE TO AN OCC BANKING CIRCULAR WHICH PROVIDED GUIDANCE TO ALL NATIONAL BANKS CONCERNING THE SALE & MARKETING OF INVESTMENT PRODUCTS ON BANK PREMISES, IN ASSOCIATION WITH THE INITIAL PUBLIC OFFERING OF SHARES OF THE NATIONS GOVERNMENT INCOME TERM TRUST 2003, INC. & NATIONS GOVERNMENT INCOME TERM TRUST 2004, INC.

Initiated By: OFFICE OF THE COMPTROLLER OF THE CURRENCY

Date Initiated: 05/04/1998

Docket/Case Number: N/A

Principal Product Type: Unit Investment Trust(s)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: STIPULATION AND CONSENT ORDER

Resolution: Settled

Resolution Date: 05/04/1998

Sanctions Ordered: Monetary/Fine \$750,000.00

Other Sanctions Ordered:



Sanction Details:	WITHOUT ADMITTING OR DENYING CHARGES, NATIONSBANK, N.A. (NKA BANK OF AMERICA, N.A.) CONSENTED TO PAY A CIVIL MONEY PENALTY OF \$750,000.
Firm Statement	WITHOUT ADMITTING OR DENYING CHARGES, NATIONSBANK, N.A. (NKA BANK OF AMERICA, N.A.) CONSENTED TO PAY A CIVIL MONEY PENALTY OF \$750,000.

Disclosure 29 of 39

Reporting Source:	Firm
Affiliate:	FIRST NATIONAL BANK OF BOSTON
Current Status:	Final
Allegations:	THAT THE FIRST NATIONAL BANK OF BOSTON ("FNBB"),AS A MEMBER OF A SELLING GROUP INVOLVED IN THE DISTRIBUTION OF DEBT SECURITIES FOR CERTAIN GOVERNMENT SPONSORED ENTERPRISES, COMMITTED CERTAIN RECORDKEEPING VIOLATIONS RELATIVE TO CUSTOMER ORDERS FOR GSE SECURITIES.
Initiated By:	THE OFFICE OF THE COMPTROLLER OF THE CURRENCY
Date Initiated:	01/16/1999
Docket/Case Number:	N/A
Principal Product Type:	Debt - Government
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	CIVIL AND ADMINISTRATIVE PENALTY/FINE/UNDERTAKING
Resolution:	Settled
Resolution Date:	01/16/1999
Sanctions Ordered:	Monetary/Fine \$100,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	IMPLEMENT POLICIES AND PROCEDURES TO ENSURE FUTURE COMPLIANCE.
Sanction Details:	THE COMPTROLLER ACCEPTED FNBB'S OFFER OF SETTLEMENT, UNDER WHICH FNBB CONSENTED TO THE ISSUANCE OF AN ORDER FINDING THAT FNBB (1) CEASE AND DESIST FROM VIOLATING THOSE PROVISIONS, (2) IMPLEMENT POLICIES AND PROCEDURES DESIGNED TO ENSURE FUTURE



COMPLIANCE, (3) PAY A CIVIL PENALTY OF \$100,000

Firm Statement

THE SETTLEMENT ENTERED INTO BY FNBB WAS PART OF AN INDUSTRY-WIDE INVESTIGATION OF THE DEBT SECURITIES MARKETS PERTAINING TO GSE'S. PURSUANT TO THE SETTLEMENT, THE COMPTROLLER AND OTHER REGULATORY AGENCIES CONCLUDED THEIR INVESTIGATION AS TO 98 GOVERNMENT SECURITIES BROKER AND DEALERS, INCLUDING FNBB, THAT HAD PARTICIPATED AS SELLING GROUP MEMBERS IN THE PRIMARY DISTRIBUTION OF DEBT SECURITIES FOR THE GSE'S. FNBB HAS INSTITUTED PROCEDURES TO COMPLY WITH THE SETTLEMENT AS WELL AS THE SEPARATE REQUIREMENTS MANDATED BY THE INDIVIDUAL GSE'S. THERE HAS BEEN NO RECURRENCE OF THE ALLEGED VIOLATIONS.

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Reporting Source:	Firm
Affiliate:	CRABBE HUSON GROUP, INC (NKA BOFA ADVISORS, LLC)
Current Status:	Final
Allegations:	THE ONTARIO SECURITIES COMMISSION ALLEGED THAT THE CRABBE HUSON GROUP, INC. (NKA BOFA ADVISORS, LLC) FAILED TO TIMELY FILE CERTAIN REPORTS CONCERNING THE AGGREGATE OWNERSHIP OF ITS CLIENTS IN A CANADIAN COMPANY.
Initiated By:	ONTARIO (CANADA) SECURITIES COMMISSION
Date Initiated:	07/22/1999
Docket/Case Number:	ORDER PURSUANT TO SECTION 127(1)
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	08/10/1999
Sanctions Ordered:	Monetary/Fine \$120,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	THE ONTARIO SECURITIES COMMISSION ALSO ORDERED THAT THE CRABBE HUSON GROUP, INC. (NKA BOFA ADVISORS, LLC) MAKE A



MONETARY CONTRIBUTION IN THE AMOUNT OF CDN \$40,000 TOWARDS THE COST OF THE COMMISSIONS INVESTIGATION OF THIS MATTER.

Sanction Details: TOTAL FUNDS EQUAL TO \$147,080 WAS PAID ON AUGUST 10, 1999 (US \$120,000 PLUS CDN \$40,000)

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Reporting Source: Firm

Affiliate: NB HOLDINGS CORPORATION (F/N/A U.S. TRUST CORPORATION)

Current Status: Final

Allegations: THE FEDERAL RESERVE BOARD AND THE NEW YORK STATE BANKING DEPARTMENT ALLEGED VIOLATIONS AND DEFICIENCIES RELATING TO THE LACK OF INTERNAL CONTROLS AND PROCEDURES AND INADEQUATE COMPLIANCE WITH THE BANK SECRECY ACT, AND THE FAILURE TO MAINTAIN ACCURATE AND COMPLETE BOOKS AND RECORDS IN CONNECTION WITH THE OPERATIONS AND ACTIVITIES OF THE STRATEGIC TRADING GROUP OF UNITED STATES TRUST COMPANY OF NEW YORK (EFFECTIVE 3/31/2006, UNITED STATES TRUST COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.).

Initiated By: FEDERAL RESERVE BOARD

Date Initiated: 07/12/2001

Docket/Case Number: 01-010-B-HC/01-010-CMP-HC

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Cease and Desist

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 07/12/2001

Sanctions Ordered: Monetary/Fine \$5,000,000.00
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON JULY 11, 2001, U.S. TRUST CORPORATION AND UNITED STATES TRUST COMPANY OF NEW YORK (EFFECTIVE 3/31/2006, UNITED STATES TRUST



COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.)PAID TO THE FEDERAL RESERVE BOARD A CIVIL MONEY PENALTY IN THE AMOUNT OF \$5 MILLION AND MADE A \$5 MILLION MONETARY PAYMENT OT THE STATE OF NEW YORK.

Firm Statement

U.S. TRUST CORPORATION AND UNITED STATES TRUST COMPANY OF NEW YORK (EFFECTIVE 3/31/2006, UNITED STATES TRUST COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.), WITHOUT ADMITTING TO ANY ALLEGATIONS, CONSENTED ON JULY 12, 2001, TO THE ISSUANCE OF THE ORDER TO CEASE AND DESIST AND ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY AND MONETARY PAYMENT ISSUED UPON CONSENT IN CONNECTION WITH THE ALLEGED VIOLATIONS AND DEFICIENCIES RELATING TO THE LACK OF INTERNAL CONTROLS AND PROCEDURES AND INADEQUATE COMPLIANCE WITH THE BANK SECRECY ACT, AND RELATING TO THE FAILURE TO MAINTAIN ACCURATE AND COMPLETE BOOKS AND RECORDS IN CONNECTION WITH THE OPERATIONS AND ACTIVITIES OF THE STRATEGIC TRADING GROUP OF UNITED STATES TRUST COMPANY OF NEW YORK (AS OF 4/1/06 UNITED STATES TRUST COMPANY, N.A.).

Reporting Source: Firm

Affiliate: UNITED STATES TRUST COMPANY, N.A. (NKA BANK OF AMERICA, N.A.)

Current Status: Final

Allegations: THE FEDERAL RESERVE BOARD AND THE NEW YORK STATE BANKING DEPARTMENT ALLEGED VIOLATIONS AND DEFICIENCIES RELATING TO THE LACK OF INTERNAL CONTROLS AND PROCEDURES AND INADEQUATE COMPLIANCE WITH THE BANK SECRECY ACT,AND THE FAILURE TO MAINTAIN ACCURATE AND COMPLETE BOOKS AND RECORDS IN CONNECTION WITH THE OPERATIONS AND ACTIVITIES OF THE STRATEGIC TRADING GROUP OF UNITED STATES TRUST COMPANY OF NEW YORK (EFFECTIVE 3/31/2006, UNITED STATES TRUST COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.).

Initiated By: FEDERAL RESERVE BOARD

Date Initiated: 07/12/2001

Docket/Case Number: 01-010-B-HC/01-010-CMP-HC

Principal Product Type: No Product

Other Product Type(s):



Principal Sanction(s)/Relief Sought: Cease and Desist

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 07/12/2001

Sanctions Ordered: Monetary/Fine \$5,000,000.00
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON JULY 11, 2001, U.S. TRUST CORPORATION AND UNITED STATES TRUST COMPANY OF NEW YORK (EFFECTIVE 3/31/2006, UNITED STATES TRUST COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.) PAID TO THE FEDERAL RESERVE BOARD A CIVIL MONEY PENALTY IN THE AMOUNT OF \$5 MILLION AND MADE A \$5 MILLION MONETARY PAYMENT TO THE STATE OF NEW YORK.

Firm Statement U.S. TRUST CORPORATION AND UNITED STATES TRUST COMPANY OF NEW YORK (EFFECTIVE 3/31/2006, UNITED STATES TRUST COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.), WITHOUT ADMITTING TO ANY ALLEGATIONS, CONSENTED ON JULY 12, 2001, TO THE ISSUANCE OF THE ORDER TO CEASE AND DESIST AND ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY AND MONETARY PAYMENT ISSUED UPON CONSENT IN CONNECTION WITH THE ALLEGED VIOLATIONS AND DEFICIENCIES RELATING TO THE LACK OF INTERNAL CONTROLS AND PROCEDURES AND INADEQUATE COMPLIANCE WITH THE BANK SECRECY ACT, AND RELATING TO THE FAILURE TO MAINTAIN ACCURATE AND COMPLETE BOOKS AND RECORDS IN CONNECTION WITH THE OPERATIONS AND ACTIVITIES OF THE STRATEGIC TRADING GROUP OF UNITED STATES TRUST COMPANY OF NEW YORK (AS OF 4/1/06 UNITED STATES TRUST COMPANY, N.A.).

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Reporting Source: Firm

Affiliate: NB HOLDINGS CORPORATION (F/K/A U.S. TRUST CORPORATION)

Current Status: Final

Allegations: THE FEDERAL RESERVE BOARD AND THE NEW YORK STATE BANKING DEPARTMENT ALLEGED VIOLATIONS AND DEFICIENCIES RELATING TO THE LACK OF INTERNAL CONTROLS AND PROCEDURES AND INADEQUATE COMPLIANCE WITH THE BANK SECRECY ACT, AND THE FAILURE TO



MAINTAIN ACCURATE AND COMPLETE BOOKS AND RECORDS IN CONNECTION WITH THE OPERATIONS AND ACTIVITIES OF THE STRATEGIC TRADING GROUP OF UNITED STATES TRUST COMPANY OF NEW YORK (EFFECTIVE 3/31/2006, UNITED STATES TRUST COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.).

Initiated By: NEW YORK STATE BANKING DEPARTMENT

Date Initiated: 07/12/2001

Docket/Case Number: 01-010-B-HC/01-010-CMP-HC

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Cease and Desist

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 07/12/2001

Sanctions Ordered: Monetary/Fine \$5,000,000.00
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON JULY 11, 2001, U.S. TRUST CORPORATION AND UNITED STATES TRUST COMPANY OF NEW YORK (EFFECTIVE 3/31/2006, UNITED STATES TRUST COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.) PAID TO THE FEDERAL RESERVE BOARD A CIVIL MONEY PENALTY IN THE AMOUNT OF \$5 MILLION AND MADE A \$5 MILLION MONETARY PAYMENT TO THE STATE OF NEW YORK.

Firm Statement U.S. TRUST CORPORATION AND UNITED STATES TRUST COMPANY OF NEW YORK (EFFECTIVE 3/31/2006, UNITED STATES TRUST COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.), WITHOUT ADMITTING TO ANY ALLEGATIONS, CONSENTED ON JULY 12, 2001, TO THE ISSUANCE OF THE ORDER TO CEASE AND DESIST AND ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY AND MONETARY PAYMENT ISSUED UPON CONSENT IN CONNECTION WITH THE ALLEGED VIOLATIONS AND DEFICIENCIES RELATING TO THE LACK OF INTERNAL CONTROLS AND PROCEDURES AND INADEQUATE COMPLIANCE WITH THE BANK SECRECY ACT, AND RELATING TO THE FAILURE TO MAINTAIN ACCURATE AND COMPLETE BOOKS AND RECORDS IN CONNECTION WITH THE OPERATIONS AND ACTIVITIES OF THE STRATEGIC



TRADING GROUP OF UNITED STATES TRUST COMPANY OF NEW YORK (AS
OF 4/1/06 UNITED STATES TRUST COMPANY, N.A.).

Reporting Source:	Firm
Affiliate:	UNITED STATES TRUST COMPANY, N.A. (N/K/A BANK OF AMERICA, N.A.)
Current Status:	Final
Allegations:	THE FEDERAL RESERVE BOARD AND THE NEW YORK STATE BANKING DEPARTMENT ALLEGED VIOLATIONS AND DEFICIENCIES RELATING TO THE LACK OF INTERNAL CONTROLS AND PROCEDURES AND INADEQUATE COMPLIANCE WITH THE BANK SECRECY ACT, AND THE FAILURE TO MAINTAIN ACCURATE AND COMPLETE BOOKS AND RECORDS IN CONNECTION WITH THE OPERATIONS AND ACTIVITIES OF THE STRATEGIC TRADING GROUP OF UNITED STATES TRUST COMPANY OF NEW YORK (EFFECTIVE 3/31/2006, UNITED STATES TRUST COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.).
Initiated By:	NEW YORK STATE BANKING DEPARTMENT
Date Initiated:	07/12/2001
Docket/Case Number:	01-010-B-HC/01-010-CMP-HC
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	07/12/2001
Sanctions Ordered:	Monetary/Fine \$5,000,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON JULY 11, 2001, U.S. TRUST CORPORATION AND UNITED STATES TRUST COMPANY OF NEW YORK (EFFECTIVE 3/31/2006, UNITED STATES TRUST COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.) PAID TO THE FEDERAL RESERVE BOARD A CIVIL MONEY PENALTY IN THE AMOUNT OF \$5 MILLION AND



MADE A \$5 MILLION MONETARY PAYMENT OT THE STATE OF NEW YORK.

Firm Statement

U.S. TRUST CORPORATION AND UNITED STATES TRUST COMPANY OF NEW YORK (EFFECTIVE 3/31/2006, UNITED STATES TRUST COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.), WITHOUT ADMITTING TO ANY ALLEGATIONS, CONSENTED ON JULY 12, 2001, TO THE ISSUANCE OF THE ORDER TO CEASE AND DESIST AND ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY AND MONETARY PAYMENT ISSUED UPON CONSENT IN CONNECTION WITH THE ALLEGED VIOLATIONS AND DEFICIENCIES RELATING TO THE LACK OF INTERNAL CONTROLS AND PROCEDURES AND INADEQUATE COMPLIANCE WITH THE BANK SECRECY ACT, AND RELATING TO THE FAILURE TO MAINTAIN ACCURATE AND COMPLETE BOOKS AND RECORDS IN CONNECTION WITH THE OPERATIONS AND ACTIVITIES OF THE STRATEGIC TRADING GROUP OF UNITED STATES TRUST COMPANY OF NEW YORK (AS OF 4/1/06 UNITED STATES TRUST COMPANY, N.A.).

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Reporting Source:	Firm
Affiliate:	BANKAMERICA CORPORATION (NKA BANK OF AMERICA CORPORATION)
Current Status:	Final
Allegations:	THE SECURITIES AND EXCHANGE COMMISSION ("COMMISSION") FOUND THAT IN 1997 AND 1998, BANKAMERICA CORPORATION ("BANKAMERICA"), PREDECESSOR OF THE CORPORATE PARENT OF THE APPLICANT, VIOLATED VARIOUS SECURITIES EXCHANGE ACT ACCOUNTING AND REPORTING PROVISIONS WITH RESPECT TO A BUSINESS ALLIANCE BETWEEN BANKAMERICA AND D.E. SHAW SECURITIES GROUP, L.P. AND RELATED ENTITIES.
Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	07/30/2001
Docket/Case Number:	3-10541
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Decision & Order of Offer of Settlement



Resolution Date:	07/30/2001
Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON JULY 30, 2001, WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, CHARGES OR FINDINGS, THE APPLICANT'S CORPORATE PARENT (BANK OF AMERICA CORPORATION) CONSENTED TO ENTRY OF AN ADMINISTRATIVE ORDER PROVIDING THAT IT CEASE AND DESIST FROM COMMITTING OR CAUSING ANY FUTURE VIOLATIONS OF THE EXCHANGE ACT ACCOUNTING AND REPORTING PROVISIONS CITED IN THE COMMISSION'S ALLEGATIONS.
Firm Statement	ON JULY 30, 2001, WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, CHARGES OR FINDINGS, THE APPLICANT'S CORPORATE PARENT (BANK OF AMERICA CORPORATION) CONSENTED TO ENTRY OF AN ADMINISTRATIVE ORDER PROVIDING THAT IT CEASE AND DESIST FROM COMMITTING OR CAUSING ANY FUTURE VIOLATIONS OF THE EXCHANGE ACT ACCOUNTING AND REPORTING PROVISIONS CITED IN THE COMMISSION'S ALLEGATIONS.

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA CORPORATION
Current Status:	Final
Allegations:	BANK OF AMERICA CORPORATION ("BAC") ALLEGEDLY HAD DEFICIENCIES IN CERTAIN INTERNAL ANTI-MONEY LAUNDERING CONTROLS RELATING TO SOUTH AMERICAN MONEY SERVICE BUSINESS CUSTOMERS.
Initiated By:	NEW YORK COUNTY (NEW YORK) DISTRICT ATTORNEY
Date Initiated:	03/01/2004
Docket/Case Number:	L03-005071
Principal Product Type:	Other
Other Product Type(s):	CORRESPONDENT BANK ACCOUNT
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled



Resolution Date:	09/28/2006
Sanctions Ordered:	Monetary/Fine \$6,000,000.00
Other Sanctions Ordered:	PLUS ADDITIONAL \$1.5 MILLION FOR COST OF INVESTIGATION.
Sanction Details:	BAC WILL PAY TOTAL OF \$7.5 MILLION, \$6 MILLION OF WHICH WILL BE PAID TO THE CITY AND STATE OF NEW YORK AND \$1.5 MILLION TO BE PAID TO THE NEW YORK COUNTY (NEW YORK) DISTRICT ATTORNEY FOR THE COST OF THE INVESTIGATION.
Firm Statement	BAC ENTERED INTO A CIVIL SETTLEMENT AGREEMENT WITH THE NEW YORK COUNTY (NEW YORK) DISTRICT ATTORNEY (DA) ON SEPTEMBER 28, 2006. THE AGREEMENT PROVIDES THAT, FROM ABOUT 2002 TO 2004, BAC HAD DEFICIENCIES IN CERTAIN INTERNAL ANTI-MONEY LAUNDERING CONTROLS AND FAILED TO REACT APPROPRIATELY TO THE RISK PRESENTED BY CERTAIN SOUTH AMERICAN MONEY SERVICES BUSINESS CUSTOMERS, WHO MOVED FUNDS ILLEGALLY THROUGH BAC. THE AGREEMENT REQUIRES BAC TO MAKE A TOTAL PAYMENT OF \$7.5 MILLION, TO COOPERATE WITH THE DA IN ONGOING INVESTIGATIONS, AND TO ABIDE BY ANTI-MONEY LAUNDERING CHANGES RECOMMENDED BY BAC'S REGULATORS.

Disclosure 35 of 39

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, N.A.
Current Status:	Final
Allegations:	ALLEGATIONS THAT BANK OF AMERICA, N.A., BY VIRTUE OF REGULATION 9B.07, EXECUTED TRADES INVOLVING PRE-EXECUTION COMMUNICATIONS WHICH WERE NOT ENTERED IN ACCORDANCE WITH PRESCRIBED TIME REQUIRMENTS AND PROCEDURES, IN VIOLATION OF REGULATION 9B.16.
Initiated By:	CHICAGO BOARD OF TRADE, INC.
Date Initiated:	08/25/2004
Docket/Case Number:	2004-INV-12B
Principal Product Type:	Other
Other Product Type(s):	TREASURY OPTIONS
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	FINE



Resolution:	Settled
Resolution Date:	09/27/2004
Sanctions Ordered:	Monetary/Fine \$20,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING ANY VIOLATION OF REGULATION 9B.16, BANK OF AMERICA, N.A. AGREED TO PAY A FINE OF \$20,000.00
Firm Statement	WITHOUT ADMITTING OR DENYING ANY VIOLATION OF REGULATION 9B.16, BANK OF AMERICA, N.A. AGREED TO PAY A FINE OF \$20,000.00

Disclosure 36 of 39

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE OFFICE OF THE COMPTROLLER OF THE CURRENCY CONDUCTED ONGOING EXAMINATIONS OF BANK OF AMERICA, NATIONAL ASSOCIATION (THE "BANK") INVOLVING THE BANK'S CONDUCT IN CONNECTION WITH ALLEGED MARKET TIMING, LATE TRADING AND RELATED MATTERS IN THE BANK'S AFFILIATED NATIONS FUNDS.
Initiated By:	OFFICE OF THE COMPTROLLER OF THE CURRENCY
Date Initiated:	02/09/2005
Docket/Case Number:	AA-EC-04-35
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	SUPERVISORY WRITTEN AGREEMENT
Resolution:	Consent
Resolution Date:	02/09/2005
Sanctions Ordered:	
Other Sanctions Ordered:	NONE
Sanction Details:	THE BANK HAS ENTERED INTO A SUPERVISORY WRITTEN AGREEMENT



DATED FEBRUARY 9, 2005, WITH THE COMPTROLLER OF THE CURRENCY. UNDER THE TERMS OF THE WRITTEN AGREEMENT, THE BANK HAS SUBMITTED AN ACTION PLAN (THE "PLAN") THAT IT SHALL IMPLEMENT AND ADHERE TO UNTIL IT RECEIVES FURTHER WRITTEN NOTICE FROM THE COMPTROLLER. THE PLAN PROVIDES FOR THE DEVELOPMENT OF CORPORATE GOVERNANCE AND INTERNAL CONTROL POLICIES AND PROCEDURES FOR TRANSACTION DOCUMENTATION OF EACH SIGNIFICANT NEW CUSTOMER RELATIONSHIP, NEW OR UNIQUE PRODUCT OR SERVICE, OR ANY SIGNIFICANT CHANGE TO AN EXISTING CUSTOMER RELATIONSHIP, PRODUCT, SERVICE OR BUSINESS PRACTICE RECOMMENDED FOR APPROVAL BY THE WEALTH AND INVESTMENT MANAGEMENT GROUP; POLICIES AND PROCEDURES GOVERNING THE APPROVAL AND RISK MANAGEMENT OF EACH SIGNIFICANT NEW CUSTOMER RELATIONSHIP, NEW OR UNIQUE PRODUCT OR SERVICE, OR ANY SIGNIFICANT CHANGE TO AN EXISTING CUSTOMER RELATIONSHIP, PRODUCT, SERVICE OR BUSINESS PRACTICE RECOMMENDED FOR APPROVAL BY THE WEALTH AND INVESTMENT MANAGEMENT GROUP; AND DEVELOPMENT OF AUDIT PROCEDURES TO PROVIDE COMPREHENSIVE COVERAGE OF ACTIVITY INVOLVING THE WEALTH AND INVESTMENT MANAGEMENT BUSINESS.

Firm Statement

THE BANK HAS ENTERED INTO A SUPERVISORY WRITTEN AGREEMENT DATED FEBRUARY 9, 2005, WITH THE COMPTROLLER OF THE CURRENCY. UNDER THE TERMS OF THE WRITTEN AGREEMENT, THE BANK HAS SUBMITTED AN ACTION PLAN (THE "PLAN") THAT IT SHALL IMPLEMENT AND ADHERE TO UNTIL IT RECEIVES FURTHER WRITTEN NOTICE FROM THE COMPTROLLER. THE PLAN PROVIDES FOR THE DEVELOPMENT OF CORPORATE GOVERNANCE AND INTERNAL CONTROL POLICIES AND PROCEDURES FOR TRANSACTION DOCUMENTATION OF EACH SIGNIFICANT NEW CUSTOMER RELATIONSHIP, NEW OR UNIQUE PRODUCT OR SERVICE, OR ANY SIGNIFICANT CHANGE TO AN EXISTING CUSTOMER RELATIONSHIP, PRODUCT, SERVICE OR BUSINESS PRACTICE RECOMMENDED FOR APPROVAL BY THE WEALTH AND INVESTMENT MANAGEMENT GROUP; POLICIES AND PROCEDURES GOVERNING THE APPROVAL AND RISK MANAGEMENT OF EACH SIGNIFICANT NEW CUSTOMER RELATIONSHIP, NEW OR UNIQUE PRODUCT OR SERVICE, OR ANY SIGNIFICANT CHANGE TO AN EXISTING CUSTOMER RELATIONSHIP, PRODUCT, SERVICE OR BUSINESS PRACTICE RECOMMENDED FOR APPROVAL BY THE WEALTH AND INVESTMENT MANAGEMENT GROUP; AND DEVELOPMENT OF AUDIT PROCEDURES TO PROVIDE COMPREHENSIVE COVERAGE OF ACTIVITY INVOLVING THE WEALTH AND INVESTMENT MANAGEMENT BUSINESS.



Reporting Source:	Firm
Affiliate:	BACAP DISTRIBUTORS, LLC
Current Status:	Final
Allegations:	ON FEBRUARY 9, 2005, NEITHER ADMITTING NOR DENYING THE FINDINGS, BACAP AND BACAP DISTRIBUTORS ENTERED INTO AN ASSURANCE OF DISCONTINUANCE WITH THE OFFICE OF THE NEW YORK ATTORNEY GENERAL TO SETTLE ALLEGATIONS THEY HAD VIOLATED THE MARTIN ACT, EXECUTIVE LAW S.63(12), AND THE GENERAL BUSINESS LAW S.349. THE ASSURANCE OF DISCONTINUANCE FINDS THAT BACAP AND BACAP DISTRIBUTORS, FROM AS EARLY AS JULY 2000 THROUGH JULY 2003, ALLOWED CERTAIN CLIENTS TO ENGAGE IN SHORT-TERM OR EXCESSIVE TRADING WITHOUT DISCLOSURE TO OTHER INVESTORS AND ENTERED INTO AN ARRANGEMENT WITH TWO ENTITIES ALLOWING THEM TO ENGAGE IN FREQUENT SHORT-TERM TRADING. ONE OF THESE ENTITIES WAS EXEMPTED FROM A REDEMPTION FEE ON SHORT-TERM TRADES.
Initiated By:	OFFICE OF THE NEW YORK ATTORNEY GENERAL
Date Initiated:	02/09/2005
Docket/Case Number:	
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	THE NYAG ASSURANCE OF DISCONTINUANCE PROVIDES THAT BANC OF AMERICA CAPITAL MANAGEMENT, LLC ("BACAP") AND BACAP DISTRIBUTORS, LLC ("BACAP DISTRIBUTORS") SHALL CEASE AND DESIST FROM ENGAGING IN ACTS IN VIOLATION OF AND WILL COMPLY WITH THE MARTIN ACT, GENERAL BUSINESS LAW S.349 AND EXECUTIVE LAW S. 63(12); BACAP AND BACAP DISTRIBUTORS SHALL PAY, JOINTLY AND SEVERALLY WITH BANC OF AMERICA SECURITIES, LLC ("BAS"), \$250 MILLION IN DISGORGEMENT AND A CIVIL MONEY PENALTY IN THE AMOUNT OF \$125 MILLION.
Resolution:	Consent
Resolution Date:	02/09/2005
Sanctions Ordered:	Monetary/Fine \$125,000,000.00
Other Sanctions Ordered:	SEE ITEM 13.
Sanction Details:	BACAP, BACAP DISTRIBUTORS AND BAS SHALL PAY, ON A JOINT AND



SEVERAL BASIS, \$250M IN DISGORGEMENT AND A CIVIL MONEY PENALTY OF \$125M. THIS IS THE SAME PAYMENT AS TO BE PAID UNDER THE PARALLEL SEC ORDER DATED FEBRUARY 9, 2005.

Firm Statement

THE NYAG ASSURANCE OF DISCONTINUANCE PROVIDES THAT (1) BACAP DISTRIBUTORS AGREE, WITH AFFILIATE COLUMBIA MANAGEMENT ADVISORS, INC. ("CMA") (N/K/A BOFA ADVISORS, LLC), TO REDUCE MANAGEMENT FEES CHARGED TO CERTAIN NATIONS AND THEN KNOWN AS THE COLUMBIA FUNDS DISTRIBUTED TO RETAIL INVESTORS BY \$32 MILLION PER YEAR THROUGH 2009, FOR A TOTAL OF \$160 MILLION IN FEE REDUCTIONS; (2) BACAP AGREES NOT TO MANAGE OR ADVISE THE NATIONS FUNDS UNLESS THE NATIONS FUNDS IMPLEMENT CERTAIN CHANGES IN CORPORATE GOVERNANCE PRACTICES, INCLUDING HAVING CHAIRMEN BE INDEPENDENT, HAVING 75% OF TRUSTEES MEET INDEPENDENCE STANDARDS, APPOINTING A SENIOR OFFICER WHO MEETS INDEPENDENCE STANDARDS TO, AMONG OTHER THINGS, MONITOR COMPLIANCE WITH APPLICABLE FEDERAL AND STATE SECURITIES LAWS, STATE LAWS RESPECTING CONFLICTS OF INTEREST, FIDUCIARY DUTIES AND CODES OF ETHICS AND COMPLIANCE REQUIREMENTS AND MANAGE THE NEGOTIATION PROCESS FOR MANAGEMENT FEES; (3) BACAP AGREES TO DEVELOP PROCEDURES FOR THE DISCLOSURE OF FEES AND COSTS; AND (4) BACAP AND BACAP DISTRIBUTORS, WITH BAS, AGREE TO PAY, ON A JOINT AND SEVERAL BASIS, \$250 MILLION IN DISGORGEMENT PLUS A CIVIL MONEY PENALTY OF \$125 MILLION.

Reporting Source:

Firm

Affiliate:

BANC OF AMERICA CAPITAL MANAGEMENT, LLC

Current Status:

Final

Allegations:

ON FEBRUARY 9, 2005, NEITHER ADMITTING NOR DENYING THE FINDINGS, BACAP AND BACAP DISTRIBUTORS ENTERED INTO AN ASSURANCE OF DISCONTINUANCE WITH THE OFFICE OF THE NEW YORK ATTORNEY GENERAL TO SETTLE ALLEGATIONS THEY HAD VIOLATED THE MARTIN ACT, EXECUTIVE LAW S.63(12), AND THE GENERAL BUSINESS LAW S.349. THE ASSURANCE OF DISCONTINUANCE FINDS THAT BACAP AND BACAP DISTRIBUTORS, FROM AS EARLY AS JULY 2000 THROUGH JULY 2003, ALLOWED CERTAIN CLIENTS TO ENGAGE IN SHORT-TERM OR EXCESSIVE TRADING WITHOUT DISCLOSURE TO OTHER INVESTORS AND ENTERED INTO AN ARRANGEMENT WITH TWO ENTITIES ALLOWING THEM TO ENGAGE IN FREQUENT SHORT-TERM TRADING. ONE OF THESE ENTITIES WAS EXEMPTED FROM A REDEMPTION FEE ON SHORT-TERM TRADES.

Initiated By:

OFFICE OF THE NEW YORK ATTORNEY GENERAL



Date Initiated:	02/09/2005
Docket/Case Number:	
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	THE NYAG ASSURANCE OF DISCONTINUANCE PROVIDES THAT BANC OF AMERICA CAPITAL MANAGEMENT, LLC ("BACAP") AND BACAP DISTRIBUTORS, LLC ("BACAP DISTRIBUTORS") SHALL CEASE AND DESIST FROM ENGAGING IN ACTS IN VIOLATION OF AND WILL COMPLY WITH THE MARTIN ACT, GENERAL BUSINESS LAW S.349 AND EXECUTIVE LAW S. 63(12); BACAP AND BACAP DISTRIBUTORS SHALL PAY, JOINTLY AND SEVERALLY WITH BANC OF AMERICA SECURITIES, LLC ("BAS"), \$250 MILLION IN DISGORGEMENT AND A CIVIL MONEY PENALTY IN THE AMOUNT OF \$125 MILLION.
Resolution:	Consent
Resolution Date:	02/09/2005
Sanctions Ordered:	Monetary/Fine \$125,000,000.00
Other Sanctions Ordered:	SEE ITEM 13.
Sanction Details:	BACAP, BACAP DISTRIBUTORS AND BAS SHALL PAY, ON A JOINT AND SEVERAL BASIS, \$250M IN DISGORGEMENT AND A CIVIL MONEY PENALTY OF \$125M. THIS IS THE SAME PAYMENT AS TO BE PAID UNDER THE PARALLEL SEC ORDER DATED FEBRUARY 9, 2005.
Firm Statement	THE NYAG ASSURANCE OF DISCONTINUANCE PROVIDES THAT (1) BACAP DISTRIBUTORS AGREE, WITH AFFILIATE COLUMBIA MANAGEMENT ADVISORS, INC. ("CMA") (N/K/A BOFA ADVISORS, LLC), TO REDUCE MANAGEMENT FEES CHARGED TO CERTAIN NATIONS AND THEN KNOWN AS THE COLUMBIA FUNDS DISTRIBUTED TO RETAIL INVESTORS BY \$32 MILLION PER YEAR THROUGH 2009, FOR A TOTAL OF \$160 MILLION IN FEE REDUCTIONS; (2) BACAP AGREES NOT TO MANAGE OR ADVISE THE NATIONS FUNDS UNLESS THE NATIONS FUNDS IMPLEMENT CERTAIN CHANGES IN CORPORATE GOVERNANCE PRACTICES, INCLUDING HAVING CHAIRMEN BE INDEPENDENT, HAVING 75% OF TRUSTEES MEET INDEPENDENCE STANDARDS, APPOINTING A SENIOR OFFICER WHO MEETS INDEPENDENCE STANDARDS TO, AMONG OTHER THINGS, MONITOR COMPLIANCE WITH APPLICABLE FEDERAL AND STATE SECURITIES LAWS, STATE LAWS RESPECTING CONFLICTS OF INTEREST, FIDUCIARY DUTIES AND CODES OF ETHICS AND COMPLIANCE REQUIREMENTS AND MANAGE THE NEGOTIATION PROCESS FOR



MANAGEMENT FEES; (3) BACAP AGREES TO DEVELOP PROCEDURES FOR THE DISCLOSURE OF FEES AND COSTS; AND (4) BACAP AND BACAP DISTRIBUTORS, WITH BAS, AGREE TO PAY, ON A JOINT AND SEVERAL BASIS, \$250 MILLION IN DISGORGEMENT PLUS A CIVIL MONEY PENALTY OF \$125 MILLION.

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA CORPORATION
Current Status:	Final
Allegations:	THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM AND THE RESERVE BANK REVIEWED CERTAIN ACTIVITIES OF BANK OF AMERICA CORPORATION'S WEALTH AND INVESTMENT MANAGEMENT GROUP. THE RESERVE BANK RAISED CONCERNS THAT BANK OF AMERICA CORPORATION (THE "BANK") AND ITS SUBSIDIARIES DID NOT ADEQUATELY ASSESS THE LEGAL AND REPUTATIONAL RISKS POSED BY CERTAIN MUTUAL FUND TRADING ACTIVITIES AND ADDRESS FLAWS IN COMPLIANCE AND RISK MANAGEMENT PERTAINING TO THE ASSET MANAGEMENT LINES OF BUSINESS. FOLLOWING THAT REVIEW, THE BANK AND THE RESERVE BANK EXECUTED A WRITTEN AGREEMENT TO ENSURE THAT THE BANK AND ITS SUBSIDIARIES MAKE PROGRESS IN THEIR EFFORTS TO ADOPT AND IMPLEMENT NUMEROUS CORRECTIVE ACTIONS AND BEST PRACTICE RECOMMENDATIONS.
Initiated By:	FEDERAL RESERVE BANK OF RICHMOND
Date Initiated:	02/09/2005
Docket/Case Number:	
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	WRITTEN AGREEMENT
Resolution:	Consent
Resolution Date:	02/09/2005
Firm Statement	THE BANK AGREED TO CONTINUE TO TAKE STEPS TO ADOPT AND IMPLEMENT CORRECTIVE ACTIONS AND BEST PRACTICE



RECOMMENDATIONS OF THE INDEPENDENT CONSULTANTS AND TO ENHANCE THE ENTERPRISE-WIDE COMPLIANCE PROGRAM TO ENSURE COMPLIANCE WITH ALL APPLICABLE LAWS AND REGULATIONS, INCLUDING BUT NOT LIMITED TO SECURITIES LAWS AND REGULATIONS INCLUDING, AMONG OTHER THINGS, A PROCESS FOR RESOLVING OR ESCALATING COMPLIANCE ISSUES, ONGOING TRAINING ON POLICIES AND PROCEDURES FOR COMPLIANCE WITH LAWS AND REGULATIONS FOR CERTAIN STAFF OF THE BANK AND ITS SUBSIDIARIES, ENSURE PROCESSES FOR AN ENHANCED APPROVAL PROCESS FOR NEW CLIENTS, NEW OR UNIQUE INVESTMENT PRODUCTS, SERVICES OR TRANSACTIONS, AND MATERIAL CHANGES TO EXISTING PRODUCTS OR SERVICES, PROCEDURES TO ENSURE THOROUGH ASSESSMENT OF RISKS, POLICIES AND PROCEDURES TO ENSURE PRODUCTS, SERVICES AND ARRANGEMENTS ARE CONSISTENT WITH BUSINESS EXPERTISE, STRATEGY AND APPROVED RISK PROFILE, PROCEDURES FOR INTERNAL AUDIT, MECHANISMS FOR PERIODIC REVIEWS, MONITORING OF ENTERPRISE-WIDE ADOPTION AND EXECUTION OF NEW POLICIES AND PROCEDURES AND OTHER RECOMMENDATIONS OF THE INDEPENDENT CONSULTANTS, AND SUBMISSION OF PROGRESS REPORTS TO RESERVE BANK.

Disclosure 39 of 39	
Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	FROM SEPTEMBER 1996 TO DECEMBER 2001, MERRILL LYNCH BREACHED SFA RULE 5.49 BY FAILING TO ACCURATELY REPORT THE CAPACITY IN WHICH IT EXECUTED TRANSACTIONS IN NON-UK EUROPEAN EQUITIES WHEN REPORTING TRANSACTIONS TO THE SFA. FROM DECEMBER 2001 UNTIL JANUARY 2006, MERRILL LYNCH BREACHED FSA RULE SUP 17.6.2R BY FAILING TO ACCURATELY REPROT THE CAPACITY IN WHICH IT EXECUTED TRANSACTIONS IN NON-UK EUROPEAN EQUITIES WHEN REPORTING TRANSACTIONS TO THE FSA.
Initiated By:	FINANCIAL SERVICES AUTHORITY
Date Initiated:	08/04/2006
Docket/Case Number:	NO DOCKET NUMBER
Principal Product Type:	Other
Other Product Type(s):	NON-UK EUROPEAN EQUITIES



Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	08/04/2006
Sanctions Ordered:	Monetary/Fine \$150,000.00
Other Sanctions Ordered:	MONETARY FINE WAS 150,000.00 IN BRITISH POUNDS. UNABLE TO ENTER IN PREFORMATTED US DOLLAR SPACE ABOVE.
Sanction Details:	N/A
Firm Statement	SEVERAL MITIGATING FACTORS WERE CONSIDERED BY THE FINANCIAL SERVICES AUTHORITY ("FSA") WHEN IMPOSING THEIR FINE: MERRILL LYNCH REPORTED THIS MATTER TO THE FSA AND HAS COOPERATED FULLY WITH THE FSA IN RESPECT TO THIS MATTER. MERRILL LYNCH HAS TAKEN SUBSTANTIAL STEPS TO IMPROVE ITS SYSTEMS AND CONTROLS TO ENSURE THAT GOING FORWARD TRANSACTION REPORTS ARE ACCURATE. THE FSA HAS STATED THAT MERRILL LYNCH'S FAILURE WAS NOT DELIBERATE OR RECKLESS. FINE TO BE PAID BY MERRILL LYNCH ON OR BEFORE AUGUST 17, 2006.



Civil - Final

Disclosure 1 of 4

Reporting Source:	Firm
Affiliate:	BAC HOME LOANS SERVICING, LP (F/K/A COUNTRYWIDE HOME LOANS SERVICING LP)
Current Status:	Final
Allegations:	THE COMPLAINT ALLEGES THAT FROM JANUARY 1, 2006 THROUGH MAY 31, 2009, HLS FAILED TO DETERMINE CONSISTENTLY AND ACCURATELY THE MILITARY STATUS OF MORTGAGE LOAN BORROWERS IN FORECLOSURE, AND THAT AS A RESULT OF THIS FAILURE, FROM JANUARY 1, 2006 THROUGH MAY 31, 2009, HLS WRONGFULLY FORECLOSED WITHOUT COURT ORDERS ON APPROXIMATELY 160 PROPERTIES OWNED BY SERVICEMEMBERS PROTECTED BY THE SERVICEMEMBERS CIVIL RELIEF ACT (SCRA).
Initiated By:	THE UNITED STATES DEPARTMENT OF JUSTICE
Court Details:	U.S. DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA; LOS ANGELES, CA; CIVIL ACTION NO. 2:11-CF-04534-PA
Date Court Action Filed:	05/26/2011
Principal Product Type:	Other
Other Product Types:	RESIDENTIAL MORTGAGE LOAN SERVICING
Relief Sought:	Money Damages (Private/Civil Complaint)
Other Relief Sought:	INJUNCTION; CERTAIN UNDERTAKINGS (SEE 13B BELOW FOR DETAILS)
Resolution:	Consent
Resolution Date:	05/31/2011
Sanctions Ordered or Relief Granted:	Cease and Desist/Injunction
Other Sanctions:	THE CONSENT ORDER REQUIRES HLS TO DEPOSIT \$20 MILLION INTO A SETTLEMENT FUND WITHIN 10 BUSINESS DAYS. THE SETTLEMENT FUND WILL BE USED TO COMPENSATE PERSONS DETERMINED TO BE VICTIMS OF VIOLATIONS OF SECTION 533(C) OF SCRA BETWEEN JANUARY 1, 2006 AND MAY 31, 2009. HLS ALSO MUST: DEVELOP AND IMPLEMENT SCRA POLICIES AND PROCEDURES TO ENSURE THAT IT DOES NOT FORECLOSE ON PRE-SERVICE MORTGAGES OF SERVICEMEMBERS; DEVELOP AND IMPLEMENT A FORECLOSURE MONITORING PROGRAM; RECEIVE APPROVAL OF ITS SCRA FORECLOSURE POLICIES AND PROCEDURES AND MONITORING PROGRAM BY COUNSEL FOR THE UNITED STATES; PROVIDE,



OR ENSURE THIRD-PARTY VENDORS PROVIDE, SCRA COMPLIANCE TRAINING TO CERTAIN MANAGEMENT OFFICIALS AND EMPLOYEES; COMMENCE A REVIEW OF CERTAIN NONJUDICIAL FORECLOSURES TO DETERMINE COMPLIANCE WITH SECTION 533(C) OF SCRA; AND CONTRACT WITH ONE OR MORE QUALIFIED INDEPENDENT ACCOUNTING FIRMS TO REVIEW A STATISTICALLY VALID SAMPLE OF HLS' HOME MORTGAGE FILES DURING JANUARY 1, 2008 THROUGH DECEMBER 31, 2010, AND PREPARE A WRITTEN REPORT THAT ADDRESSES, AMONG OTHER THINGS, WHETHER, DURING THE PERIOD OF MILITARY SERVICE AND FOR THE STATUTORILY-REQUIRED PERIOD THEREAFTER, HLS LIMITED THE INTEREST RATE TO A MAXIMUM OF 6 PERCENT PER YEAR.

Sanction Details:

UNLESS OTHERWISE STATED IN THE CONSENT ORDER, THE PROVISIONS OF THE CONSENT ORDER MUST BE IMPLEMENTED WITHIN 60 DAYS. THE CONSENT ORDER IS TO BE IN EFFECT FOR FOUR YEARS, WHICH TERM MAY BE EXTENDED FOR GOOD CAUSE SHOWN. HLS DEPOSITED \$20 MILLION INTO THE INTEREST BEARING ACCOUNT ON JUNE 8, 2011. THE CONSENT ORDER ENJOINS HLS, ITS OFFICERS, EMPLOYEES, AGENTS, REPRESENTATIVES, AND AFFILIATED ASSIGNEES, AND AFFILIATED SUCCESSORS IN INTEREST, AND ALL THOSE IN ACTIVE CONCERT OR PARTICIPATION WITH ANY OF THEM, FROM FORECLOSING ON THE PRE-SERVICE MORTGAGES OF SCRA PROTECTED BORROWERS WITHOUT PROVIDING THE PROTECTIONS CONFERRED BY SCRA.

Firm Statement

THE CONSENT ORDER REQUIRES HLS TO DEPOSIT \$20 MILLION INTO A SETTLEMENT FUND WITHIN 10 BUSINESS DAYS. THE SETTLEMENT FUND WILL BE USED TO COMPENSATE PERSONS DETERMINED TO BE VICTIMS OF VIOLATIONS OF SECTION 533(C) OF SCRA BETWEEN JANUARY 1, 2006 AND MAY 31, 2009. HLS ALSO MUST: DEVELOP AND IMPLEMENT SCRA POLICIES AND PROCEDURES TO ENSURE THAT IT DOES NOT FORECLOSE ON PRE-SERVICE MORTGAGES OF SERVICEMEMBERS; DEVELOP AND IMPLEMENT A FORECLOSURE MONITORING PROGRAM; RECEIVE APPROVAL OF ITS SCRA FORECLOSURE POLICIES AND PROCEDURES AND MONITORING PROGRAM BY COUNSEL FOR THE UNITED STATES; PROVIDE, OR ENSURE THIRD-PARTY VENDORS PROVIDE, SCRA COMPLIANCE TRAINING TO CERTAIN MANAGEMENT OFFICIALS AND EMPLOYEES; COMMENCE A REVIEW OF CERTAIN NONJUDICIAL FORECLOSURES TO DETERMINE COMPLIANCE WITH SECTION 533(C) OF SCRA; AND CONTRACT WITH ONE OR MORE QUALIFIED INDEPENDENT ACCOUNTING FIRMS TO REVIEW A STATISTICALLY VALID SAMPLE OF HLS' HOME MORTGAGE FILES DURING JANUARY 1, 2008 THROUGH DECEMBER 31, 2010, AND PREPARE A WRITTEN REPORT THAT ADDRESSES, AMONG OTHER THINGS, WHETHER, DURING THE PERIOD OF MILITARY SERVICE AND FOR THE STATUTORILY-REQUIRED PERIOD THEREAFTER, HLS LIMITED THE INTEREST RATE TO A MAXIMUM OF 6 PERCENT PER YEAR. UNLESS OTHERWISE STATED IN THE CONSENT ORDER, THE PROVISIONS



OF THE CONSENT ORDER MUST BE IMPLEMENTED WITHIN 60 DAYS. THE CONSENT ORDER IS TO BE IN EFFECT FOR FOUR YEARS, WHICH TERM MAY BE EXTENDED FOR GOOD CAUSE SHOWN. HLS DEPOSITED \$20 MILLION INTO THE INTEREST BEARING ACCOUNT ON JUNE 8, 2011. THE CONSENT ORDER ENJOINS HLS, ITS OFFICERS, EMPLOYEES, AGENTS, REPRESENTATIVES, AND AFFILIATED ASSIGNEES, AND AFFILIATED SUCCESSORS IN INTEREST, AND ALL THOSE IN ACTIVE CONCERT OR PARTICIPATION WITH ANY OF THEM, FROM FORECLOSING ON THE PRE-SERVICE MORTGAGES OF SCRA PROTECTED BORROWERS WITHOUT PROVIDING THE PROTECTIONS CONFERRED BY SCRA.

Disclosure 2 of 4

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA CORPORATION
Current Status:	Final
Allegations:	THE SECURITIES AND EXCHANGE COMMISSION ("SEC") ALLEGED THAT BANK OF AMERICA CORPORATION (THE "CORPORATION") VIOLATED THE FEDERAL PROXY RULES BY FAILING TO DISCLOSE INFORMATION CONCERNING MERRILL LYNCH & CO., INC.'S KNOWN AND ESTIMATED LOSSES IN THE FOURTH QUARTER OF 2008 PRIOR TO THE SHAREHOLDER VOTE ON DECEMBER 5, 2008 TO APPROVE THE MERGER BETWEEN THE TWO COMPANIES.
Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Court Details:	U.S. DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK; 10-CV-0215(JSR)
Date Court Action Filed:	01/12/2010
Principal Product Type:	No Product
Other Product Types:	
Relief Sought:	Civil Penalty(ies)/Fine(s)
Other Relief Sought:	INJUNCTION
Resolution:	Consent
Resolution Date:	02/24/2010
Sanctions Ordered or Relief Granted:	Monetary/Fine \$150,000,000.00 Disgorgement/Restitution
Other Sanctions:	THE CORPORATION AGREED, FOR A PERIOD OF THREE YEARS, TO COMPLY WITH AND MAINTAIN CERTAIN REQUIREMENTS RELATED TO THE



CORPORATION'S CORPORATE GOVERNANCE AND DISCLOSURE PRACTICES.

Sanction Details:

N/A

Firm Statement

ON FEBRUARY 24, 2010, A FINAL CONSENT JUDGMENT (THE "FINAL JUDGMENT") WAS ENTERED BY THE COURT. UNDER THE TERMS OF THE FINAL JUDGMENT, THE CORPORATION AGREED TO PAY \$1 IN DISGORGEMENT AND A \$150 MILLION CIVIL PENALTY TO BE DISTRIBUTED TO SHAREHOLDERS AS PART OF THE SEC'S FAIR FUNDS PROGRAM AT A LATER DATE IN ACCORDANCE WITH FURTHER ORDER OF THE COURT. IN ADDITION, AS PART OF THE FINAL JUDGMENT, THE CORPORATION AGREED, FOR A PERIOD OF THREE YEARS, TO COMPLY WITH AND MAINTAIN CERTAIN REQUIREMENTS RELATED TO THE CORPORATION'S CORPORATE GOVERNANCE AND DISCLOSURE PRACTICES.

Disclosure 3 of 4

Reporting Source:

Firm

Affiliate:

BANK OF AMERICA CORPORATION

Current Status:

Final

Allegations:

THE SECURITIES AND EXCHANGE COMMISSION ("SEC") ALLEGED THAT BANK OF AMERICA CORPORATION (THE "CORPORATION") VIOLATED SECTION 14(A) OF THE SECURITIES EXCHANGE ACT OF 1934 (THE "EXCHANGE ACT") AND RULE 14A-9 THEREUNDER BY FAILING TO DISCLOSE IN THE CORPORATION'S JOINT PROXY STATEMENT FILED ON NOVEMBER 3, 2008 THE INCENTIVE COMPENSATION THAT MERRILL LYNCH & CO., INC. COULD, IN ITS DISCRETION, AWARD TO ITS EMPLOYEES PRIOR TO COMPLETION OF ITS MERGER WITH THE CORPORATION.

Initiated By:

SECURITIES AND EXCHANGE COMMISSION

Court Details:

U.S. DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK; 09-CV-6829

Date Court Action Filed:

08/03/2009

Principal Product Type:

No Product

Other Product Types:

Relief Sought:

Civil Penalty(ies)/Fine(s)

Other Relief Sought:

INJUNCTION

Resolution:

Consent

Resolution Date:

02/24/2010



Sanctions Ordered or Relief Granted:	Monetary/Fine \$150,000,000.00 Disgorgement/Restitution
Other Sanctions:	THE CORPORATION AGREED, FOR A PERIOD OF THREE YEARS, TO COMPLY WITH AND MAINTAIN CERTAIN REQUIREMENTS RELATED TO THE CORPORATION'S CORPORATE GOVERNANCE AND DISCLOSURE PRACTICES.
Sanction Details:	N/A
Firm Statement	ON FEBRUARY 24, 2010, A FINAL CONSENT JUDGMENT (THE "FINAL JUDGMENT") WAS ENTERED BY THE COURT. UNDER THE TERMS OF THE FINAL JUDGMENT, THE CORPORATION AGREED TO PAY \$1 IN DISGORGEMENT AND A \$150 MILLION CIVIL PENALTY TO BE DISTRIBUTED TO SHAREHOLDERS AS PART OF THE SEC'S FAIR FUNDS PROGRAM AT A LATER DATE IN ACCORDANCE WITH FURTHER ORDER OF THE COURT. IN ADDITION, AS PART OF THE FINAL JUDGMENT, THE CORPORATION AGREED, FOR A PERIOD OF THREE YEARS, TO COMPLY WITH AND MAINTAIN CERTAIN REQUIREMENTS RELATED TO THE CORPORATION'S CORPORATE GOVERNANCE AND DISCLOSURE PRACTICES.

Disclosure 4 of 4

Reporting Source:	Firm
Affiliate:	FLEET FINANCIAL GROUP (FKA FLEETBOSTON FINANCIAL CORPORATION NKA BANK OF AMERICA CORPORATION)
Current Status:	Final
Allegations:	U.S. DISTRICT COURT FOUND THAT FLEET FINANCIAL GROUP ISSUED DEFICIENT PROXY MATERIALS.
Initiated By:	U.S. DISTRICT COURT (CONNECTICUT)
Court Details:	U.S. DISTRICT COURT
Date Court Action Filed:	01/01/1981
Principal Product Type:	Other
Other Product Types:	BANKING PRODUCT
Relief Sought:	
Other Relief Sought:	
Resolution:	Judgment Rendered
Resolution Date:	06/30/1981



**Sanctions Ordered or Relief
Granted:**

Other Sanctions:

Sanction Details:

Firm Statement

PRIOR TO ITS AFFILIATION WITH FLEET, A U.S. DISTRICT COURT FOUND IN 1981 THAT HARTFORD NATIONAL CORPORATION (HNC) ISSUED DEFICIENT PROXY MATERIALS TO ITS SHAREHOLDERS FOR A MEETING TO APPROVE A MERGER WITH ANOTHER BANK. NEW PROXY MATERIALS WERE ISSUED IN LIGHT OF THE COURT'S DECISION AND HNC'S SHAREHOLDERS REAPPROVED THE MERGER IN 1982.



Civil - Pending

Disclosure 1 of 1

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA CORPORATION
Current Status:	Pending
Allegations:	THE ATTORNEY GENERAL OF THE STATE OF NEW YORK ALLEGES THAT BANK OF AMERICA CORPORATION ("BAC"), ITS FORMER CEO KENNETH D. LEWIS AND ITS FORMER CFO JOSEPH L. PRICE ENGAGED IN ACTS AND PRACTICES IN CONNECTION WITH THE MERGER (THE "MERGER") BETWEEN BAC AND MERRILL LYNCH & CO. INC. ("MERRILL LYNCH") THAT VIOLATED CERTAIN PROVISIONS OF THE NEW YORK GENERAL BUSINESS LAW (THE "MARTIN ACT") AND THE NEW YORK EXECUTIVE LAW.
Initiated By:	ATTORNEY GENERAL OF THE STATE OF NEW YORK
Court Details:	SUPREME COURT OF THE STATE OF NEW YORK, COUNTY OF NEW YORK
Date Court Action Filed:	02/04/2010
Date Notice/Process Served:	02/04/2010
Principal Product Type:	No Product
Other Product Types:	
Relief Sought:	Disgorgement
Other Relief Sought:	INJUNCTION; RESTITUTION
Firm Statement	ON FEBRUARY 4, 2010, THE NEW YORK ATTORNEY GENERAL FILED A CIVIL COMPLAINT IN THE SUPREME COURT OF NEW YORK STATE, ENTITLED PEOPLE OF THE STATE OF NEW YORK V. BANK OF AMERICA, ET AL. THE COMPLAINT NAMES AS DEFENDANTS BAC AND BAC'S FORMER CHIEF EXECUTIVE AND CHIEF FINANCIAL OFFICERS, KENNETH D. LEWIS, AND JOSEPH L. PRICE, AND ALLEGES VIOLATIONS OF SECTIONS 352, 352-C(1)(A), 352-C(1)(C), AND 353 OF THE NEW YORK MARTIN ACT, AND SECTION 63(12) OF THE NEW YORK EXECUTIVE LAW. THE COMPLAINT ATTACKS THE SUFFICIENCY AND ACCURACY OF BAC'S DISCLOSURES AND ITS PRACTICES RELATED TO BAC'S MERGER WITH MERRILL LYNCH, INCLUDING: (I) THE DISCLOSURE OF MERRILL LYNCH'S FINANCIAL CONDITION AND ITS INTERIM AND PROJECTED LOSSES DURING THE FOURTH QUARTER OF 2008, (II) BAC'S CONTACTS WITH FEDERAL GOVERNMENT OFFICIALS REGARDING BAC'S CONSIDERATION OF INVOKING THE MATERIAL ADVERSE EFFECT CLAUSE IN THE MERGER AGREEMENT WITH MERRILL LYNCH AND THE POSSIBILITY OF OBTAINING ADDITIONAL GOVERNMENT ASSISTANCE, (III) THE DISCLOSURE OF THE



PAYMENT AND TIMING OF YEAR-END INCENTIVE COMPENSATION TO MERRILL LYNCH EMPLOYEES, AND (IV) PUBLIC STATEMENTS REGARDING THE DUE DILIGENCE CONDUCTED IN CONNECTION WITH THE MERGER AND POSITIVE STATEMENTS REGARDING THE MERGER. THE COMPLAINT SEEKS AN UNSPECIFIED AMOUNT IN DISGORGEMENT, PENALTIES, RESTITUTION, AND DAMAGES, COSTS AND OTHER EQUITABLE RELIEF.

End of Report



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