

BrokerCheck Report

CONVERGEX PRIME SERVICES LLC

CRD# 140185

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

Please contact FINRA with any concerns.

About BrokerCheck®

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

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

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

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

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

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

- **How current is this information?**

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

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

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

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

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

• **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.



CONVERGEX PRIME SERVICES LLC

CRD# 140185

SEC# 8-67289

Main Office Location

30000 MILL CREEK AVENUE
SUITE 200
ALPHARETTA, GA 30022

Mailing Address

30000 MILL CREEK AVENUE
SUITE 200
ALPHARETTA, GA 30022

Business Telephone Number

678-405-4200

Report Summary for this Firm

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

Firm Profile

This firm is classified as a limited liability company.
This firm was formed in Georgia on 02/13/2006.
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 15

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: 08/31/2014

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



Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Georgia on 02/13/2006.

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.

CONVERGEX PRIME SERVICES LLC

Doing business as CONVERGEX PRIME SERVICES LLC

CRD# 140185

SEC# 8-67289

Main Office Location

30000 MILL CREEK AVENUE
SUITE 200
ALPHARETTA, GA 30022

Mailing Address

30000 MILL CREEK AVENUE
SUITE 200
ALPHARETTA, GA 30022

Business Telephone Number

678-405-4200



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): CONVERGEX GROUP, LLC

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

Position SOLE MEMBER

Position Start Date 12/2009

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): DEJARNETTE, MICHAEL LEE

2903155

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

Position PRESIDENT AND MANAGER

Position Start Date 12/2009

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): DEJARNETTE, NICHOLAS TODD

4223616

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

Position MD, OFFICER

Position Start Date 12/2009

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? No

Is this a public reporting company? No

Legal Name & CRD# (if any): MCCARTHY, CONOR JOHN
2866668

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

Position EXECUTIVE MANAGING DIRECTOR AND CFO

Position Start Date 06/2014

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): NELSON, DOUGLAS MARC
1979906

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

Position CHIEF EXECUTIVE OFFICER AND MANAGER

Position Start Date 12/2009

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): NOLL, ERIC WILSON

Firm Profile



Direct Owners and Executive Officers (continued)

	2050994
Is this a domestic or foreign entity or an individual?	Individual
Position	MANAGER-NON EMPLOYEE
Position Start Date	01/2014
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No
<hr/>	
Legal Name & CRD# (if any):	RAPPOLD, CHARLES EDWARD II 1095326
Is this a domestic or foreign entity or an individual?	Individual
Position	NON-EMPLOYEE MANAGER
Position Start Date	12/2009
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No
<hr/>	
Legal Name & CRD# (if any):	WOODHAM, PATRICIA BARRETT 2520369
Is this a domestic or foreign entity or an individual?	Individual
Position	FINOP, CCO
Position Start Date	12/2009
Percentage of Ownership	Less than 5%

Firm Profile



Direct Owners and Executive Officers (continued)

Does this owner direct the management or policies of the firm? No

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): CONVERGEX HOLDINGS, LLC

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

Company through which indirect ownership is established CONVERGEX GROUP, LLC

Relationship to Direct Owner SHAREHOLDER, MEMBER

Relationship Established 04/2013

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): THE BANK OF NEW YORK MELLON CORPORATION

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

Company through which indirect ownership is established AGENCY BROKERAGE HOLDING, LLC

Relationship to Direct Owner SHAREHOLDER, MEMBER

Relationship Established 12/2009

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): AGENCY BROKERAGE HOLDING, LLC

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



Firm Profile

Indirect Owners (continued)

Company through which indirect ownership is established CONVERGEX HOLDINGS, LLC

Relationship to Direct Owner SHAREHOLDER, MEMBER

Relationship Established 12/2009

Percentage of Ownership 25% but less than 50%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): GTCR FUND VIII AIV, L.P.

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

Company through which indirect ownership is established CONVERGEX HOLDINGS, LLC

Relationship to Direct Owner SHAREHOLDER, MEMBER

Relationship Established 12/2009

Percentage of Ownership 25% but less than 50%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): GTCR GOLDER RAUNER II, LLC

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

Company through which indirect ownership is established GTCR PARTNERS VIII, L.P.

Relationship to Direct Owner PARTNER

Relationship Established 12/2009

Firm Profile



Indirect Owners (continued)

Percentage of Ownership Other General Partners

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

Is this a public reporting company? No

Legal Name & CRD# (if any): GTCR PARTNERS VIII, L.P.

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

Company through which indirect ownership is established GTCR FUND VIII AIV, L.P.

Relationship to Direct Owner PARTNER

Relationship Established 12/2009

Percentage of Ownership Other General Partners

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

Is this a public reporting company? No

Legal Name & CRD# (if any): HEINEMAN, STEVEN P
5386950

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

Company through which indirect ownership is established CONVERGEX GROUP, LLC

Relationship to Direct Owner DIRECTOR

Relationship Established 04/2013

Percentage of Ownership Other General Partners

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

Firm Profile



Indirect Owners (continued)

Is this a public reporting company? No

Legal Name & CRD# (if any): RAPPOLD, CHARLES EDWARD II
1095326

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

Company through which indirect ownership is established CONVERGEX GROUP, LLC

Relationship to Direct Owner DIRECTOR

Relationship Established 12/2009

Percentage of Ownership Other General Partners

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

Is this a public reporting company? No

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 06/08/2006 to 11/19/2014.



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 5 types of businesses.

Types of Business

Exchange member engaged in exchange commission business other than floor activities

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

Put and call broker or dealer or option writer

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

Other - INTRODUCING BROKER, OPTIONS ON FUTURES, US DOLLAR DENOMINATED FUTURES, FOREIGN CURRENCY DENOMINATED FUTURES.

Other Types of Business

This firm does effect transactions in commodities, commodity futures, or commodity options.

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

Non-Securities Business Description:



Firm Operations

Clearing Arrangements

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

Introducing Arrangements

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

Name: INTERACTIVE BROKERS LLC
CRD #: 36418
Business Address: ONE PICKWICK PLAZA-2ND FL.
 GREENWICH, CT 06830
Effective Date: 12/22/2011
Description: CONVERGEX PRIME SERVICES LLC WILL OPERATE UNDER A FULLY DISCLOSED AGREEMENT WITH INTERACTIVE BROKERS LLC

Name: PERSHING LLC
CRD #: 7560
Business Address: ONE PERSHING PLAZA
 10TH FLOOR
 JERSEY CITY, NJ 07399
Effective Date: 03/01/2011
Description: CONVERGEX PRIME SERVICES LLC WILL OPERATE UNDER A FULLY DISCLOSED AGREEMENT WITH PERSHING LLC.

Name: J.P. MORGAN CLEARING CORP.
CRD #: 28432
Business Address: ONE METROTECH CENTER NORTH
 BROOKLYN, NY 11201
Effective Date: 01/02/2009
Description: CONVERGEX PRIME SERVICES LLC WILL OPERATE UNDER A FULLY DISCLOSED AGREEMENT WITH JP MORGAN CLEARING CORP

Name: GOLDMAN SACHS EXECUTION & CLEARING, L.P.
CRD #: 3466
Business Address: 30 HUDSON STREET
 JERSEY CITY, NJ 07302

Firm Operations



Introducing Arrangements

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

Effective Date: 04/28/2006

Description: CONVERGEX PRIME SERVICES LLC WILL OPERATE UNER A FULLY DISCLOSED AGREEMEN WITH GOLDMAN SACHS EXECUTION & CLEARING, L.P.

Firm Operations

Industry Arrangements



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

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

Name: INTERACTIVE BROKERS LLC
CRD #: 36418
Business Address: ONE PICKWICK PLAZA-2ND FL.
 GREENWICH, CT 06830
Effective Date: 12/22/2011
Description: INTERACTIVE BROKERS MAINTAINS POSSESSION AND CONTROL OF CONVERGEX PRIME SERVICES LLC'S FUNDS AND SECURITIES

Name: PERSHING LLC
CRD #: 7560
Business Address: ONE PERSHING PLAZA
 10TH FLOOR
 JERSEY CITY, NJ 07399
Effective Date: 03/01/2011
Description: PERSHING LLC MAINTAINS POSSESSION AND CONTROL OF CONVERGEX PRIME SERVICES LLC'S FUNDS AND SECURITIES.

Name: J.P. MORGAN CLEARING CORP.
CRD #: 28432
Business Address: ONE METROTECH CENTER NORTH
 BROOKLYN, NY 11201
Effective Date: 01/02/2009
Description: JP MORGAN MAINATINS POSSESSION AND CONTROL OF CONVERGEX PRIME SERVICES LLC'S FUNDS AND SECURITIES.

Name: GOLDMAN SACHS EXECUTION & CLEARING, L.P.
CRD #: 3466
Business Address: 30 HUDSON STREET
 JERSEY CITY, NJ 07302
Effective Date: 04/28/2006
Description: GSEC MAINTAINS POSSESSION AND CONTROL OF CONVERGEX PRIME

Firm Operations



Industry Arrangements (continued)

SERVICES LLC'S FUNDS AND SECURITIES.

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

Name:	INTERACTIVE BROKERS LLC
CRD #:	36418
Business Address:	ONE PICKWICK PLAZA-2ND FL. GREENWICH, CT 06830
Effective Date:	12/22/2011
Description:	CONVERGEX PRIME SERVICES LLC INTRODUCES ACCOUNTS TO INTERACTIVE BROKERS ON A FULLY DISCLOSED BASIS. INTERACTIVE BROKERS MAINTAINS POSSESSION AND CONTROL OF CUSTOMER FUNDS AND SECURITIES.
Name:	PERSHING LLC
CRD #:	7560
Business Address:	ONE PERSHING PLAZA 10TH FLOOR JERSEY CITY, NJ 07399
Effective Date:	03/01/2011
Description:	CONVERGEX PRIME SERVICES LLC INTRODUCES CUSTOMER ACCOUNTS TO PERSHING LLC ON A FULLY DISCLOSED BASIS. PERSHING LLC MAINTAINS POSSESSION AND CONTROL OF CUSTOMER FUNDS AND SECURITIES.
Name:	J.P. MORGAN CLEARING CORP.
CRD #:	28432
Business Address:	ONE METROTECH CENTER NORTH BROOKLYN, NY 11201
Effective Date:	01/02/2009
Description:	CONVERGEX PRIME SERVICES LLC INTRODUCES CUSTOMER ACCOUNTS TO J.P. MORGAN CLEARING CORP. ON A FULLY DISCLOSED BASIS. J.P. MORGAN CLEARING CORP. MAINTAINS POSSESSION AND CONTROL OF CUSTOMER FUNDS AND SECURITIES.
Name:	GOLDMAN SACHS EXECUTION & CLEARING, L.P.
CRD #:	3466
Business Address:	30 HUDSON STREET JERSEY CITY, NJ 07302

Firm Operations



Industry Arrangements (continued)

Effective Date: 04/28/2006

Description: CONVERGEX PRIME SERVICES LLC INTRODUCES ACCOUNTS TO GOLDMAN SACHS EXECUTION & CLEARING ON A FULLY DISCLOSED BASIS. GOLDMAN SACHS EXECUTION & CLEARING MAINTAINS POSSESSION AND CONTROL OF CUSTOMER FUNDS AND SECURITIES.

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.

THE BANK OF NEW YORK CAPITAL MARKETS LIMITED is under common control with the firm.

Business Address:	1 CANADA SQUARE LONDON, UNITED KINGDOM E14 5AL
Effective Date:	01/13/1994
Foreign Entity:	Yes
Country:	UNITED KINGDOM
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

ALCENTRA LIMITED is under common control with the firm.

CRD #:	160617
Business Address:	10 GRESHAM STREET LONDON, UNITED KINGDOM EC2V 7JD
Effective Date:	03/30/2012
Foreign Entity:	Yes
Country:	UNITED KINGDOM
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON

Firm Operations



Organization Affiliates (continued)

OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

HEDGEMARK SECURITIES LLC is under common control with the firm.

CRD #: 164503

Business Address: 780 THIRD AVENUE
SUITE 4400
NEW YORK, NY 10017

Effective Date: 01/02/2013

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

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

Business Address: 780 THIRD AVENUE
SUITE 4400
NEW YORK, NY 10017

Effective Date: 02/01/2011

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

PERSHING SECURITIES SINGAPORE PRIVATE LIMITED is under common control with the firm.

Business Address: 1 MARINA BOULEVARD
#28-00 ONE MARINA BOULEVARD

Firm Operations



Organization Affiliates (continued)

MARINA, SINGAPORE 18989

Effective Date: 06/30/2009

Foreign Entity: Yes

Country: SINGAPORE

Securities Activities: Yes

Investment Advisory Activities: No

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

PERSHING (CHANNEL ISLANDS) LIMITED is under common control with the firm.

Business Address: FLOOR 1
LIBERATION STATION
ST HELIER, JERSEY JE2 3AS

Effective Date: 03/21/2011

Foreign Entity: Yes

Country: JERSEY

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION

PERSHING SECURITIES AUSTRALIA PTY LTD. is under common control with the firm.

Business Address: LEVEL 7
1 CHIFLEY SQUARE
SYDNEY, AUSTRALIA NSW 2000

Effective Date: 12/01/2011

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: Yes

Investment Advisory Yes

Firm Operations



Organization Affiliates (continued)

Activities:

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING EITHER A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

PERSHING SECURITIES CANADA LIMITED is under common control with the firm.

Business Address: 44 CHIP MAN HILL
SUITE 1000
ST JOHN, NEW BRUNSWICK, CANADA

Effective Date: 11/20/2009

Foreign Entity: Yes

Country: CANADA

Securities Activities: Yes

Investment Advisory Activities: No

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION

CONVERGEX EXECUTION SOLUTIONS LLC is under common control with the firm.

CRD #: 35693

Business Address: 1633 BROADWAY
NEW YORK, NY 10019

Effective Date: 09/27/2006

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

PARETO NEW YORK LLC is under common control with the firm.

CRD #: 145995

Firm Operations



Organization Affiliates (continued)

Business Address: 200 PARK AVE
NEW YORK, NY 10166

Effective Date: 03/10/2009

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION

WALTER SCOTT & PARTNERS LIMITED is under common control with the firm.

Business Address: ONE CHARLOTTE SQUARE
SCOTLAND, SCOTLAND

Effective Date: 10/02/2006

Foreign Entity: Yes

Country: SCOTLAND

Securities Activities: No

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

THE BANK OF NEW YORK MELLON, S.A., INSTITUCION DE BANCA MULTIPLE is under common control with the firm.

Business Address: AV. PASEO DE LA REFORMA NO. 115
PISO 23, COL. LOMAS DE CHAPULTEPEC
MEXICO, MEXICO 11000

Effective Date: 08/15/2008

Foreign Entity: Yes

Country: MEXICO

Securities Activities: Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

BNY MELLON SERVICOS FINANCEIROS DISTRIBUIDORA DE TITULOS E VALORES MOBILIARIOS SA is under common control with the firm.

Business Address: AV. PRESIDENTE WILSON 231- 11 ANDAR
RIO DE JANEIRO, BRAZIL 20030-905

Effective Date: 07/01/2007

Foreign Entity: Yes

Country: BRAZIL

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

BNY MELLON ASSET MANAGEMENT HONG KONG LIMITED is under common control with the firm.

Business Address: ALEXANDRA HOUSE, 6TH FLOOR
18 CHARTER ROAD
CENTRAL, HONG KONG

Effective Date: 07/01/2007

Foreign Entity: Yes

Country: HONG KONG

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

BNY MELLON ARX INVESTIMENTOS LTDA is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: AVENIDA BORGES DE MEDEIROS
633-401/402/403/404
RIO DE JANEIRO, BRAZIL 22430-041

Effective Date: 11/14/2008

Foreign Entity: Yes

Country: BRAZIL

Securities Activities: No

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

CONVERGEX LIMITED is under common control with the firm.

Business Address: 16-18 NEW BRIDGE STREET
LONDON, ENGLAND EC4V 6AG

Effective Date: 06/22/2009

Foreign Entity: Yes

Country: ENGLAND

Securities Activities: Yes

Investment Advisory Activities: No

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT SUBSIDIARY OF BNY CONVERGEX GROUP LLC.

NEWTON CAPITAL MANAGEMENT LTD is under common control with the firm.

Business Address: 160 QUEEN VICTORIA STREET
LONDON, ENGLAND

Effective Date: 07/01/2007

Foreign Entity: Yes

Country: UNITED KINGDOM

Securities Activities: No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

BNY MELLON ASSET MANAGEMENT INTERNATIONAL LIMITED is under common control with the firm.

Business Address: 160 QUEEN VICTORIA STREET
LONDON, ENGLAND

Effective Date: 07/01/2007

Foreign Entity: Yes

Country: ENGLAND

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

BNY MELLON ASSET MANAGEMENT AUSTRALIA LIMITED is under common control with the firm.

Business Address: LEVEL 6, 7 MACQUARIE PLACE
SYDNEY, AUSTRALIA NSW 2000

Effective Date: 07/01/2007

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

BNY MELLON ASSET MANAGEMENT CANADA LIMITED is under common control with the firm.

Business Address: ROYAL TRUST TOWER, DOMINION CENTRE
TORONTO, CANADA

Firm Operations



Organization Affiliates (continued)

Effective Date:	07/01/2007
Foreign Entity:	Yes
Country:	CANADA
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

STANDISH is under common control with the firm.

CRD #:	113972
Business Address:	201 WASHINGTON STREET 29TH FLOOR BOSTON,, MA
Effective Date:	07/01/2007
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

PARETO, PARETO INVESTMENT MANAGEMENT LIMITED is under common control with the firm.

Business Address:	160 QUEEN VICTORIA STREET LONDON, ENGLAND EC4V 4LA
Effective Date:	07/01/2007
Foreign Entity:	Yes
Country:	ENGLAND
Securities Activities:	No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

MELLON HEDGE ADVISORS is under common control with the firm.

CRD #: 133402

Business Address: MELLON FINANCIAL CENTER
201 WASHINGTON STREET
BOSTON,, MA 02108

Effective Date: 07/01/2007

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

BNY MELLON CAPITAL MARKETS, LLC is under common control with the firm.

CRD #: 17454

Business Address: ONE WALL STREET
NEW YORK, NY 10286

Effective Date: 07/01/2007

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

Firm Operations



Organization Affiliates (continued)

MELLON CAPITAL MANAGEMENT CORPORATION is under common control with the firm.

CRD #:	105764
Business Address:	50 FREMONT STREET SAN FRANCISCO, CA 94105
Effective Date:	07/01/2007
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

MBSC SECURITIES CORPORATION is under common control with the firm.

CRD #:	231
Business Address:	200 PARK AVENUE NEW YORK, NY 10166
Effective Date:	07/01/2007
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION

EACM ADVISORS LLC is under common control with the firm.

CRD #:	132057
Business Address:	200 CONNECTICUT AVENUE NORWALK, CT 06854
Effective Date:	07/01/2007

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

THE DREYFUS CORPORATION is under common control with the firm.

CRD #:	105642
Business Address:	200 PARK AVENUE NEW YORK, NY 10166
Effective Date:	07/01/2007
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

THE BOSTON COMPANY ASSET MANAGEMENT LLC is under common control with the firm.

CRD #:	105616
Business Address:	201 WASHINGTON STREET BOSTON, MA 02108
Effective Date:	07/01/2007
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes

Firm Operations



Organization Affiliates (continued)

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

LIQUIDPOINT, LLC is under common control with the firm.

CRD #: 47658

Business Address: 311 S WACKER DRIVE
CHICAGO, IL 60606

Effective Date: 07/02/2007

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

URDANG SECURITIES MANAGEMENT INC is under common control with the firm.

CRD #: 107644

Business Address: 630 W GERMANTOWN PIKE
PLYMOUTH MEETING, PA 19462

Effective Date: 03/02/2006

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

ALCENTRA NY, LLC is under common control with the firm.

CRD #: 128557

Firm Operations



Organization Affiliates (continued)

Business Address: 150 SOUTH RODEO DRIVE
BEVERLY HILLS, CA 90212

Effective Date: 10/06/2003

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

URDANG CAPITAL MANAGEMENT INC is under common control with the firm.

CRD #: 106983

Business Address: 630 W GERMANTOWN PIKE
PLYMOUTH MEETING
PLYMOUTH MEETING, PA 19462

Effective Date: 03/02/2006

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

THE BANK OF NEW YORK MELLON SECURITIES COMPANY JAPAN LIMITED is under common control with the firm.

Business Address: FUKOKU SEIMEI BUILDING 6F 2-2-2
UCHISAIWAI-CHO, CHIYODA-KU
TOKYO, JAPAN

Effective Date: 08/26/2005

Foreign Entity: No

Firm Operations



Organization Affiliates (continued)

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

G-TRADE SERVICES LLC is under common control with the firm.

CRD #: 140314

Business Address: 1633 BROADWAY
NEW YORK,, NY 10019

Effective Date: 10/25/2006

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

PERSHING ADVISOR SOLUTIONS LLC is under common control with the firm.

CRD #: 36671

Business Address: ONE PERSHING PLAZA
JERSEY CITY, NJ

Effective Date: 09/19/2005

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW

Firm Operations



Organization Affiliates (continued)

YORK MELLON CORPORATION.

BNY MELLON CAPITAL MARKETS EMEA LIMITED is under common control with the firm.

Business Address: ONE CANADA SQUARE
LONDON, ENGLAND E14 5AL

Effective Date: 05/07/1999

Foreign Entity: Yes

Country: ENGLAND

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

ACN 003 231 829 LIMITED is under common control with the firm.

Business Address: 2 CHIEFLEY SQUARE
LEVEL 17, THE CHIEFLEY TOWER
SYDNEY, AUSTRALIA

Effective Date: 01/13/1994

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: Yes

Investment Advisory Activities: No

Description: ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

BNY MARKETS LIMITED is under common control with the firm.

Business Address: ONE CANADA SQUARE
LONDON, ENGLAND E14 5AL

Effective Date: 02/22/1996

Foreign Entity: Yes

Firm Operations



Organization Affiliates (continued)

Country:	ENGLAND
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

PERSHING SECURITIES INTERNATIONAL LIMITED is under common control with the firm.

Business Address:	HANOVER BUILDING, 2ND FLOOR WINDMILL LANE DUBLIN 2, IRELAND
Effective Date:	05/01/2003
Foreign Entity:	Yes
Country:	IRELAND
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

PERSHING SECURITIES LIMITED is under common control with the firm.

Business Address:	CAPSTAN HOUSE ONE CLOVE CRESCENT, EAST INDIA DOCK LONDON, UNITED KINGDOM E142BH
Effective Date:	05/01/2003
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

Firm Operations



Organization Affiliates (continued)

PERSHING LIMITED is under common control with the firm.

Business Address:	CAPSTAN HOUSE ONE CLOVE CRESCENT EAST INDIA DOCK LONDON, UNITED KINGDOM E142BH
Effective Date:	05/01/2003
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

PERSHING LLC is under common control with the firm.

CRD #:	7560
Business Address:	ONE PERSHING PLAZA JERSEY CITY, NJ
Effective Date:	05/01/2003
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

IVY ASSET MANAGEMENT LLC is under common control with the firm.

CRD #:	107831
Business Address:	ONE JERICO PLAZA JERICO, NY 11753
Effective Date:	02/02/1994

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

LOCKWOOD ADVISORS INC is under common control with the firm.

CRD #:	106108
Business Address:	10 VALLEY STREAM PARKWAY MALVERN, PA 19355
Effective Date:	10/01/2002
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

WESTMINSTER RESEARCH ASSOCIATES LLC is under common control with the firm.

CRD #:	14508
Business Address:	1633 BROADWAY 48TH NEW YORK, NY 10019
Effective Date:	09/27/2006
Foreign Entity:	No
Country:	
Securities Activities:	Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities:	No
Description:	ENTITY IS UNDER COMMON CONTROL WITH THE APPLICANT BY REASON OF BEING A DIRECT OR INDIRECT SUBSIDIARY OF THE BANK OF NEW YORK MELLON CORPORATION.

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

THE BANK OF NEW YORK MELLON CORPORATION is a Bank Holding Company and controls the firm.

Business Address:	ONE WALL STREET NEW YORK, NY 10286
Effective Date:	05/01/2000
Description:	THIS IS THE HOLDING COMPANY



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

Regulatory - Final

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

Disclosure 1 of 1

Reporting Source: Regulator

Current Status: Final



Allegations: FINRA RULES 2010, 7450, NASD RULE 3010 - CONVERGEX PRIME SERVICES LLC FAILED TO TRANSMIT ALMOST ALL OF ITS REPORTABLE ORDER EVENTS (ROES) TO THE ORDER AUDIT TRAIL SYSTEM (OATS) DURING THE REVIEW PERIOD. THE FIRM'S SUPERVISORY SYSTEM DID NOT PROVIDE FOR SUPERVISION REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS, REGULATIONS AND FINRA RULES CONCERNING OATS REPORTING.

Initiated By: FINRA

Date Initiated: 06/26/2012

Docket/Case Number: [2011027286401](#)

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 06/26/2012

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Sanctions Ordered: Censure
Monetary/Fine \$13,500.00

Other Sanctions Ordered: UNDERTAKING

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED, FINED \$13,500 AND REQUIRED TO REVISE ITS WRITTEN SUPERVISORY PROCEDURES REGARDING OATS REPORTING WITHIN 30 BUSINESS DAYS OF ACCEPTANCE OF THIS AWC BY THE NAC. FINE PAID IN FULL ON JULY 12, 2012.

Reporting Source: Firm

Current Status: Final



Allegations: FINRA RULES 2010, 7450, NASD RULE 3010 - CONVERGEX PRIME SERVICES LLC FAILED TO TRANSMIT ALMOST ALL OF ITS REPORTABLE ORDER EVENTS (ROES) TO THE ORDER AUDIT TRAIL SYSTEM (OATS) DURING THE REVIEW PERIOD. THE FIRM'S SUPERVISORY SYSTEM DID NOT PROVIDE FOR SUPERVISION REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS, REGULATIONS AND FINRA RULES CONCERNING OATS REPORTING.

Initiated By: FINRA

Date Initiated: 06/26/2012

Docket/Case Number: [2011027286401](#)

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 06/26/2012

Sanctions Ordered: Censure
Monetary/Fine \$13,500.00

Other Sanctions Ordered: UNDERTAKING

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED, FINED \$13,500 AND REQUIRED TO REVISE ITS WRITTEN SUPERVISORY PROCEDURES REGARDING OATS REPORTING WITHIN 30 BUSINESS DAYS OF ACCEPTANCE OF THIS AWC BY THE NAC.

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	1	7	0
Criminal	0	1	0
Civil Event	5	1	0



Disclosure Event Details

Regulatory - Final

Disclosure 1 of 7

Reporting Source:	Firm
Affiliate:	BANK OF NEW YORK MELLON
Current Status:	Final
Allegations:	<p>ON SEPTEMBER 22,2008, BANK OF NEW YORK MELLON ("BNYM")BORROWED FROM THE BOSTON RESERVE BANK UNDER THE ASSET-BACKED COMMERCIAL PAPER MONEY MARKET MUTUAL FUND LIQUIDITY FACILITY (THE "AMLF"), WHICH BORROWING WAS SUPPORTED BY ASSET-BACKED COMMERCIAL PAPER ("ABCP") COLLATERAL BNYM PLEDGED TO THE BOSTON RESERVE BANK. IT WAS ALLEGED THAT DUE TO THE FAILURE IN ITS INTERNAL PROCESSES AT THAT TIME, A PORTION OF THE ABCP COLLATERAL THAT BNYM HAD PLEDGED TO THE BOSTON RESERVE BANK WAS INELIGIBLE UNDER THE TERMS OF THE AMLF. AS A RESULT, BNYM RECEIVED MORE IN THE AMLF LOANS PROCEEDS THAN IT OTHERWISE WOULD HAVE BEEN ADVANCED BASED UPON THE ELIGIBLE ABCP COLLATERAL IT PLEDGED. SUBSEQUENTLY, BNYM TIMELY RE-PAID ALL AMOUNTS BORROWED UNDER THE AMLF.</p>
Initiated By:	BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM (RE: BNYM)
Date Initiated:	12/01/2010
Docket/Case Number:	DOCKET NO. 12-018-CMP-SMB
Principal Product Type:	Money Market Fund(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	ORDER OF ASSESSMENT OF A CIVIL MONETARY PENALTY
Resolution:	Consent
Resolution Date:	04/13/2012
Sanctions Ordered:	Monetary/Fine \$6,000,000.00
Other Sanctions Ordered:	WITHIN 60 DAYS OF THIS ORDER, BNYM SHALL SUBMIT TO THE FEDERAL RESERVE BANK OF NEW YORK ("NEW YORK RESERVE BANK") AN ACCEPTABLE WRITTEN PLAN TO ENHANCE ITS COMMUNICATION AND



ESCALATION POLICIES AND PROCEDURES. THE PLAN SHALL DESCRIBE THE SPECIFIC ACTIONS THAT BNYM WILL TAKE.

Sanction Details:

CEASE AND DESIST AND AN ORDER OF ASSESSMENT OF A CIVIL MONETARY PENALTY ISSUED UPON CONSENT.

Firm Statement

THE BOARD OF GOVERNORS AND BNYM HAVE MUTUALLY AGREED TO ENTER INTO THIS COMBINED ORDER TO CEASE AND DESIST AND ORDER OF ASSESSMENT OF A CIVIL MONETARY PENALTY ISSUED UPON CONSENT (THE "ORDER") IN CONNECTION WITH BNYM'S PARTICIPATION IN THE AMLF PROGRAM BETWEEN SEPTEMBER 2008 AND JANUARY 2009, DURING WHICH TIME BNYM ALLEGEDLY BREACHED CERTAIN REPRESENTATIONS AND WARRANTIES IN ITS LETTER OF AGREEMENT WITH THE BOSTON RESERVE BANK WITH RESPECT TO THE COLLATERAL BNYM PLEDGED TO THE AMLF AND FAILED TO REPORT AND RESOLVE ITS ALLEGED VIOLATIONS OF THE TERMS AND CONDITIONS OF THE AMLF.

Disclosure 2 of 7

Reporting Source:

Firm

Affiliate:

CIBC MELLON TRUST COMPANY

Current Status:

Final

Allegations:

SEC REFERRING TO A RELATED INJUNCTIVE ACTION COMMENCED AND SIMULTANEOUSLY SETTLED, ALLEGED THAT A FINAL JUDGMENT WAS ENTERED BY CONSENT AGAINST CMTC (AN ENTITY THAT IS 50% OWNED BY MELLON CANADA HOLDING COMPANY) IN THE U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA PERMANENTLY ENJOINING CMTC FROM FUTURE VIOLATIONS OF SECURITIES ACT SECTION 5, EXCHANGE ACT SECTION 10(B) AND RULE 10B-5, EXCHANGE ACT SECTION 15(A), EXCHANGE ACT SECTION 17A(C)(1) AND FROM AIDING AND ABETTING FUTURE VIOLATIONS OF EXCHANGE ACT SECTION 10(B) OR RULE 10B-5. THE SEC COMPLAINT CONTAINED ALLEGATIONS THAT CMTC HAD FILED TO REGISTER AS A TRANSFER AGENT WITH SEC, THAT IT HAD ISSUED "LEGEND FREE" STOCK CERTIFICATES OF A COMPANY WHOSE SHARES WERE NOT REGISTERED WITH THE SEC, THAT ONE OF ITS MANAGERS HAD ACCEPTED PAYMENTS OF STOCK FROM THE COMPANY'S OFFICERS TO ISSUE THE CERTIFICATES, AND THAT IT HAD ACTED AS AN UNREGISTERED BROKER OR DEALER IN CONNECTION WITH ITS STOCK PLAN ADMINISTRATION BUSINESS.

Initiated By:

SECURITIES & EXCHANGE COMMISSION

Date Initiated:

03/02/2005



Docket/Case Number:	ADMIN. PROC. NO. 3-11839
Principal Product Type:	Other
Other Product Type(s):	TRANSFER AGENT SERVICES AND STOCK PLAN ADMINISTRATION SERVICES.
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	UNDERTAKING TO ENGAGE AN INDEPENDENT CONSULTANT TO REVIEW ITS TRANSFER AGENT BUSINESS AS IT RELATES TO COMPANIES WITH U.S. REGISTERED SECURITIES, ITS STOCK PLAN ADMINISTRATION BUSINESS AS IT RELATES TO U.S. INVESTORS, AND ITS RELEVANT POLICIES AND PROCEDURES. IN A RELATED SEC CIVIL INJUNCTIVE ACTION, CMTC AGREED TO THE ENTRY OF AN INJUNCTION AND TO PAY A CIVIL MONETARY PENALTY AND DISGORGEMENT.
Resolution:	Settled
Resolution Date:	03/02/2005
Sanctions Ordered:	Censure
Other Sanctions Ordered:	UNDERTAKING TO ENGAGE AN INDEPENDENT CONSULTANT TO REVIEW ITS TRANSFER AGENT BUSINESS AS IT RELATES TO COMPANIES WITH U.S. REGISTERED SECURITIES, ITS STOCK PLAN ADMINISTRATION BUSINESS AS IT RELATES TO U.S. INVESTORS, AND ITS RELEVANT POLICIES AND PROCEDURES. IN A RELATED SEC CIVIL INJUNCTIVE ACTION, CMTC AGREED TO THE ENTRY OF AN INJUNCTION AND TO PAY A CIVIL MONETARY PENALTY AND DISGORGEMENT.
Sanction Details:	CMTC AGREED TO THE ENTRY OF AN SEC ADMINISTRATIVE ORDER CENSURING IT AND TO AN UNDERTAKING TO ENGAGE AN INDEPENDENT CONSULTANT TO REVIEW ITS TRANSFER AGENT BUSINESS AS IT RELATES TO COMPANIES WITH U.S. REGISTERED SECURITIES, ITS STOCK PLAN ADMINISTRATION BUSINESS AS IT RELATES TO U.S. INVESTORS, AND ITS RELEVANT POLICIES AND PROCEDURES. IN THE PREDICATE SEC CIVIL INJUNCTIVE ACTION, CMTC AGREED TO THE ENTRY OF A PERMANENT INJUNCTION AND TO PAY A CIVIL MONETARY PENALTY OF \$5 MILLION AND DISGORGEMENT OF \$889,773 AND PREJUDGMENT INTEREST OF \$140,270. CMTC MADE PAYMENT ON MARCH 4, 2005.
Firm Statement	ON JANUARY 14, 2005 CMTC (AN ENTITY THAT IS 50% OWNED BY MELLON CANADA HOLDING COMPANY) SUBMITTED AN OFFER OF SETTLEMENT TO THE SEC WHICH WAS ACCEPTED ON MARCH 2, 2005. IN THE OFFER, AND SOLELY FOR THE PURPOSE OF THE ADMINISTRATIVE PROCEEDING AND ANY OTHER PROCEEDINGS ARISING OUT OF THE SEC'S INVESTIGATION BROUGHT BY OR ON BEHALF



OF THE SEC OR TO WHICH THE SEC IS A PARTY, CMTC CONSENTED TO FINDINGS THAT CMTC HAD CONSENTED TO THE ENTRY OF A FINAL JUDGMENT IN FEDERAL DISTRICT COURT ON FEBRUARY 24, 2005 RESOLVING SEC ALLEGATIONS THAT CMTC HAD VIOLATED CERTAIN PROVISIONS OF THE FEDERAL SECURITIES LAWS AS SET FORTH IN 7, ABOVE. CMTC AGREED TO THE ENTRY OF AN SEC ADMINISTRATIVE ORDER CENSURING IT AND REQUIRING IT TO ENGAGE AND INDEPENDENT CONSULTANT TO REVIEW ITS RELEVANT PROCEDURES. IN THE PREDICATE SEC CIVIL INJUNCTIVE ACTION, CMTC AGREED TO THE ENTRY OF A PERMANENT INJUNCTION AND TO PAY A CIVIL MONETARY PENALTY AND DISGORGEMENT.

Disclosure 3 of 7

Reporting Source:	Firm
Affiliate:	DREYFUS SERVICE ORGANIZATION
Current Status:	Final
Allegations:	IT WAS ALLEGED THAT DSO BETWEEN JUNE 2002 AND NOVEMBER 2002 "CAUSED, PERMITTED OR WAS OTHERWISE RESPONSIBLE FOR ALLOWING THE EMPLOYEE TO SOLICIT AND WRITE EIGHT NEW JERSEY ANNUITY CONTRACTS WITHOUT THE BENEFIT OF A CURRENT LICENSE."
Initiated By:	STATE OF NEW JERSEY DEPARTMENT OF BANKING AND INSURANCE
Date Initiated:	05/25/2005
Docket/Case Number:	E08-74
Principal Product Type:	Annuity(ies) - Fixed
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	NONE
Resolution:	Order
Resolution Date:	09/08/2008
Sanctions Ordered:	Monetary/Fine \$4,000.00
Other Sanctions Ordered:	NONE.
Sanction Details:	WITHOUT ADMITTING OR DENYING ANY VIOLATION OF THE INSURANCE STATUTES OR REGULATIONS OR ANY WRONGDOING, DSO



CONSENTED TO AN ADMINISTRATIVE SANCTION IN THE AMOUNT OF \$4,000.00 TO FULLY AND COMPLETELY RESOLVE THE MATTER.

Firm Statement

DSO HAD AN EMPLOYEE WITH A NON-RESIDENT NJ INSURANCE LICENSE WHICH HAD EXPIRED AND WAS LATER REINSTATED. THE SALES WERE MADE DURING THE PERIOD WHEN THE EMPLOYEE'S LICENSE WAS INACTIVE, ALTHOUGH DSO HAD REASON TO BELIEVE THE LICENSE WAS, IN FACT, ACTIVE.

Disclosure 4 of 7

Reporting Source: Firm

Affiliate: THE BANK OF NEW YORK MELLON CORPORATION

Current Status: Final

Appealed To and Date Appeal Filed: N/A

Allegations: THIS REGULATORY ACTION RELATES TO THE LATE FILING OF CERTAIN SHAREHOLDING REPORTS. BUNDESANSTALT FÜR FINANZDIENSTLEISTUNGSAUFSICHT (THE "BAFIN"), THE FINANCIAL SUPERVISORY AUTHORITY IN GERMANY, ALLEGED THAT THE BANK OF NEW YORK MELLON CORPORATION ("BNY MELLON") VIOLATED CERTAIN SUPERVISORY DUTIES UNDER THE SECURITIES TRADING ACT (THE "ACT"). UNDER THIS ACT, ANYONE WHOSE SHAREHOLDING IN A GERMAN ISSUER REACHES, EXCEEDS OR FALLS BELOW 3%, 5%, 10%, 15%, 20%, 30%, 50% OR 75% OF THE VOTING RIGHTS SHALL NOTIFY THE ISSUER AND THE BAFIN, WITHOUT UNDUE DELAY, AND WITHIN FOUR TRADING DAYS AT THE LATEST. THE BAFIN ALLEGED THAT: (1) NOTIFICATIONS SENT BY BNY MELLON ON BEHALF OF CERTAIN SUBSIDIARIES TO A GERMAN ISSUER AND THE BAFIN OF THE REDUCTION OF ITS VOTING SHARES IN THE ISSUER BELOW THE 3% THRESHOLD WAS ONE MONTH LATE AND (2) BNY MELLON FAILED TO TAKE THE SUPERVISORY MEASURES REQUIRED UNDER THE ACT TO PREVENT CONTRAVENTION OF THE SHAREHOLDING NOTICE OBLIGATIONS BY ITS SUBSIDIARIES.

Initiated By: BUNDESANSTALT FÜR FINANZDIENSTLEISTUNGSAUFSICHT

Date Initiated: 11/04/2010

Docket/Case Number: GZ: WA 17WP 3120-2010/0111

Principal Product Type: No Product

Other Product Type(s): NONE

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



Other Sanction(s)/Relief Sought:	NONE
Resolution:	Order
Resolution Date:	05/12/2011
Sanctions Ordered:	Monetary/Fine \$33,300.00
Other Sanctions Ordered:	N/A
Sanction Details:	N/A
Firm Statement	ON MAY 12, 2011, THE BAFIN ISSUED AN ADMINISTRATIVE ORDER THAT: (1) DETERMINED THAT BNY MELLON NEGLIGENTLY FAILED TO COMPLY WITH THE SUPERVISORY REQUIREMENTS WITH RESPECT TO ITS SUBSIDIARIES IN ORDER TO ENSURE COMPLIANCE WITH THE NOTIFICATION DEADLINES AND (2) IMPOSED AGAINST BNY MELLON AN ADMINISTRATIVE FINE OF EUR 22,500.00 (APPROX. \$31,725) AND A FEE (FOR PROCEDURAL COSTS) OF EUR 1,125.00 (APPROX. \$1,586). BNY MELLON MADE PAYMENT EFFECTIVE MAY 27, 2011.

Disclosure 5 of 7

Reporting Source:	Firm
Affiliate:	THE BANK OF NEW YORK MELLON
Current Status:	Final
Allegations:	FROM AT LEAST JANUARY 1, 2003 THROUGH JUNE 30,2004. IN CONNECTION WITH CERTAIN AUCTIONS, THE BANK OF NEW YORK ("BNY") ACCEPTED INITIAL OR REVISED BIDS AFTER SUBMISSION DEADLINES AND ALLOWED BROKER-DEALERS TO INTERVENE IN AUCTIONS. IN CERTAIN INSTANCES, THIS CONDUCT ALSO AFFECTED THE RATE PAID ON THE AUCTION RATE SECURITY. AS A RESULT BNY CAUSED VIOLATIONS OF SECTION 17(A)2 OF THE SECURITIES ACT
Initiated By:	SECURITIES AND EXCHANGE COMMISSION("SEC")
Date Initiated:	01/09/2007
Docket/Case Number:	SEC ADMIN, PROCEEDING FILE NO# 3-12526
Principal Product Type:	Debt - Municipal
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	



Other Sanction(s)/Relief Sought:	TO MAKE CERTAIN DISCLOSURE REGARDING ITS MATERIAL AUTION PRACTICES AND PROCEDURES: AND NOT LATER THAN 6 MONTHS AFTER THE DATE OF THE ORDER,HAVE ITS CEO OR GENERAL COUNSEL CERTIFY IN WRITING TO THE STAFF OF THE COMMISSION THAT THE BANK OF NEW YORK HAS IMPLEMENTED PROCEDURES: MONETARY SETTLEMENT IN THE AMOUNT OF \$750,000.
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	01/09/2007
Sanctions Ordered:	Monetary/Fine \$750,000.00
Other Sanctions Ordered:	TO MAKE CERTAIN DISCLOSURE REGARDING ITS MATERIAL AUTION PRACTICES AND PROCEDURES: AND NOT LATER THAN 6 MONTHS AFTER THE DATE OF THE ORDER,HAVE ITS CEO OR GENERAL COUNSEL CERTIFY IN WRITING TO THE STAFF OF THE COMMISSION THAT THE BANK OF NEW YORK HAS IMPLEMENTED PROCEDURES: MONETARY SETTLEMENT IN THE AMOUNT OF \$750,000.
Sanction Details:	CEASE AND DESISIT ORDER AND A SETTLEMENT IN THE AMOUNT OF \$750,000

Disclosure 6 of 7

Reporting Source:	Firm
Affiliate:	THE BANK OF NEW YORK MELLON
Current Status:	Final
Allegations:	ON NOVEMBER 8, 2005, THE BANK OF NEW YORK (THE BANK), AN AFFILIATE OF THE REGISTRANT, ENTERED INTO A NON-PROSECUTION AGREEMENT WITH THE U.S. ATTORNEY'S OFFICE FOR THE EASTERN DISTRICT OF NEW YORK AND SOUTHERN DISTRICT NEW YORK. THE RESPECTIVE EDNY AND SDNY INVESTIGATIONS RELATED TO ACTIONS BY BANK EMPLOYEES THAT FACILITATED A FRAUDULENT SCHEME CONDUCTED BY RW PROFESSIONAL LEASING SERVICES CORP., A FORMER CUSTOMER OF ONE OF THE BANK'S LONG ISLAND BRANCH OFFICES, AND CERTAIN FUNDS TRANSFER ACTIVITIES TO AND FROM RUSSIA FROM 1996-1999. AMONG OTHER THINGS, THE NON-PROSECUTION AGREEMENT OUTLINES A SERIES OF MEASURES, MANY OF WHICH ALREADY ARE COMPLETED AND OTHERS THAT ARE WELL UNDERWY, TO ENHANCE THE BANK'S PROCEDURES FOR MONITORING AND REPORTING SUSPICIOUS ACTIVITY.
Initiated By:	U.S. ATTORNEY'S OFFICES FOR THE EASTERN AND SOUTHERN DISTRICTS OF NEW YORK ("EDNY AND SDNY")



Date Initiated: 11/08/2005

Docket/Case Number:

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: NON-PROSECUTION AGREEMENT; RESTITUTION AND FORFEITURE BY THE BANK OF NEW YORK OF \$38 MILLION

Resolution: Settled

Resolution Date: 11/08/2005

Sanctions Ordered: Disgorgement/Restitution

Other Sanctions Ordered:

Sanction Details: THE BANK HAS AGREED TO PAY RESTITUTUIN AND FORFEITURE TOTALING \$38 MILLION, ALL OF WHICH HAS BEEN PREVIOUSLY RESERVED. THE AGREEMENT, WHICH HAS A TERM OF THREE YEARS, PROVIDES FOR THE BANK TO RETAIN AN INDEPENDENT EXAMINER TO REVIEW THE ENHANCED PROCEDURES AND REPORT TO THE GOVERNMENT ON A PERIODIC BASIS.

Firm Statement SEE QUESTION 12C

Disclosure 7 of 7

Reporting Source: Firm

Affiliate: THE BANK OF NEW YORK MELLON

Current Status: Final

Allegations: FAILED AS A TRANSFER AGENT TO EXERCISE RESONABLE CARE TO ASCERTAIN THE CORRECT ADDRESSES OF LOST SECURITY HOLDERS AND ESCHEATED ASSETS BELONGING TO THOSE SECURITY HOLDERS TO VARIOUS STATES

Initiated By: SECURITIES AND EXCHANGE COMMISSION ("SEC")

Date Initiated: 04/24/2006

Docket/Case Number: SEC FILE NO 3-12269

Principal Product Type: Banking Products (Other than CD(s))


Other Product Type(s):
Principal Sanction(s)/Relief Sought:

Cease and Desist

Other Sanction(s)/Relief Sought:

THE BANK'S AGREEMENT TO OFFER PAYMENT TO CERTAIN SECURITY HOLDERS FOR PROPERTY ESCHEATED ERRRONEOUSLY (WHILE RESERVING THE RIGHT TO PURSUE THEIR CLAIM FOE PAYMENT WITH THE STATE TO WHICH THE PROPERTY IS ESCHEATED); A PENALTY OF \$250,000 AND THE BANK'S RETENTION OF AN INDEPENDENT CONSULTANT TO REVIEW AND EVALUATE CERTAIN OF THE BANK'S POLICIES AND PROCEDURES.

Resolution:

Settled

Resolution Date:

04/24/2006

Sanctions Ordered:

Monetary/Fine \$250,000.00

Other Sanctions Ordered:

THE BANK'S AGREEMENT TO OFFER PAYMENT TO CERTAIN SECURITY HOLDERS FOR PROPERTY ESCHEATED ERRRONEOUSLY (WHILE RESERVING THE RIGHT TO PURSUE THEIR CLAIM FOE PAYMENT WITH THE STATE TO WHICH THE PROPERTY IS ESCHEATED); A PENALTY OF \$250,000 AND THE BANK'S RETENTION OF AN INDEPENDENT CONSULTANT TO REVIEW AND EVALUATE CERTAIN OF THE BANK'S POLICIES AND PROCEDURES.

Sanction Details:

CEASE AND DESIST AND A PENALTY OF \$250,000



Regulatory - Pending

Disclosure 1 of 1

Reporting Source:	Firm
Affiliate:	THE BANK OF NEW YORK MELLON CORPORATION
Current Status:	Pending
Allegations:	THE ADMINISTRATIVE COMPLAINT ALLEGES THAT THE BANK OF NEW YORK MELLON CORPORATION ("BNY MELLON") IMPROPERLY CHARGED AND REPORTED PRICES FOR STANDING INSTRUCTION FOREIGN EXCHANGE ("FX") TRANSACTIONS EXECUTED IN CONNECTION WITH CUSTODY SERVICES PROVIDED BY BNY MELLON. THE REGISTRANT IS NOT A DEFENDANT TO THIS ACTION.
Initiated By:	MASSACHUSETTS SECURITIES DIVISION OF THE OFFICE OF THE SECRETARY OF THE COMMONWEALTH
Date Initiated:	10/26/2011
Docket/Case Number:	2011-0044
Principal Product Type:	Other
Other Product Type(s):	FOREIGN EXCHANGE SERVICES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST, DISGORGEMENT
Firm Statement	ON OCTOBER 26, 2011, THE MASSACHUSETTS SECURITIES DIVISION FILED AN ADMINISTRATIVE COMPLAINT AGAINST BNY MELLON, THE PARENT COMPANY OF THE REGISTRANT. BNY MELLON BELIEVES THAT THE CLAIMS ASSERTED IN THE ACTIONS ARE WITHOUT MERIT, AND REFLECT A FUNDAMENTAL MISUNDERSTANDING OF THE ROLE OF CUSTODIAN BANKS AND THE OPERATION OF INSTITUTIONAL FX MARKETS. BNY MELLON PLANS TO DEFEND ITSELF VIGOROUSLY ON BEHALF OF ITS SHAREHOLDERS.

**Criminal - Final Disposition****Disclosure 1 of 1**

Reporting Source: Firm

Affiliate: CONVERGEX GLOBAL MARKETS LIMITED

Current Status: Final

Status Date: 12/18/2013

Charge Details: THE DEPARTMENT OF JUSTICE ALLEGED CONVERGEX GLOBAL MARKETS LTD. ("CGM") VIOLATED TITLE 18, U.S. CODE SECTIONS 1349 AND 1343 BY MAKING FALSE AND MISLEADING STATEMENTS ABOUT, AND FAILED ADEQUATELY TO DISCLOSE, ITS PRACTICE OF EFFECTING CERTAIN TRANSACTIONS ON A NET BASIS.

Felony: Yes

Court Details: UNITED STATES DISTRICT COURT OF NEW JERSEY, CASE 2:13-CR-00811

Charge Date: 12/18/2013

Disposition Details: FINE OF \$13,200,000; RESTITUTION OF \$12,789,973.

Firm Statement THE DEPARTMENT OF JUSTICE ALLEGED CONVERGEX GLOBAL MARKETS LTD. ("CGM") VIOLATED TITLE 18, U.S. CODE SECTIONS 1349 AND 1343 BY MAKING FALSE AND MISLEADING STATEMENTS ABOUT, AND FAILED ADEQUATELY TO DISCLOSE, ITS PRACTICE OF EFFECTING CERTAIN TRANSACTIONS ON A NET BASIS.

Reporting Source: Firm

Affiliate: CONVERGEX GROUP, LLC

Current Status: Final

Status Date: 12/18/2013

Charge Details: THE DEPARTMENT OF JUSTICE ALLEGED CONVERGEX GLOBAL MARKETS LTD. ("CGM") VIOLATED TITLE 18, U.S. CODE SECTIONS 1349 AND 1343 BY MAKING FALSE AND MISLEADING STATEMENTS ABOUT, AND FAILED ADEQUATELY TO DISCLOSE, ITS PRACTICE OF EFFECTING CERTAIN TRANSACTIONS ON A NET BASIS.

Felony: Yes

Court Details: UNITED STATES DISTRICT COURT OF NEW JERSEY, CASE 2:13-CR-00811

Charge Date: 12/18/2013



Disposition Details:

FINE OF \$13,200,000; RESTITUTION OF \$12,789,973.

Firm Statement

THE DEPARTMENT OF JUSTICE ALLEGED CONVERGEX GLOBAL MARKETS LTD. ("CGM") VIOLATED TITLE 18, U.S. CODE SECTIONS 1349 AND 1343 BY MAKING FALSE AND MISLEADING STATEMENTS ABOUT, AND FAILED ADEQUATELY TO DISCLOSE, ITS PRACTICE OF EFFECTING CERTAIN TRANSACTIONS ON A NET BASIS.



Civil - Final

Disclosure 1 of 1

Reporting Source:	Firm
Affiliate:	CIBC MELLON TRUST COMPANY
Current Status:	Final
Allegations:	SEC ALLEGED VIOLATIONS OF SECURITIES ACT SECTION 5, EXCHANGE ACT SECTION 10(B) AND RULE 10B-5, EXCHANGE ACT SECTION 15(A), EXCHANGE ACT SECTION 17A(C)(1), AND FROM AIDING AND ABETTING VIOLATIONS OF EXCHANGE ACT SECTION 10(B) AND RULE 10B-5. SEC ALLEGED THAT CMTC (AN ENTITY THAT IS 50% OWNED BY MELLON CANADA HOLDING COMPANY) HAD FAILED TO REGISTER AS A TRANSFER AGENT WITH THE SEC, THAT IT HAD ISSUED "LEGEND FREE" STOCK CERTIFICATES OF A COMPANY WHOSE SHARES WERE NOT REGISTERED WITH THE SEC, THAT ONE OF ITS MANAGERS HAD ACCEPTED PAYMENTS OF STOCK FROM THE COMPANY'S OFFICERS TO ISSUE THE CERTIFICATES, AND THAT IT HAD ACTED AS AN UNREGISTERED BROKER OR DEALER IN CONNECTION WITH ITS STOCK PLAN ADMINISTRATION BUSINESS.
Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION ("SEC")
Court Details:	U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA; WASHINGTON, D.C.; DOCKET NO. 1:05CV00333(PLF)
Date Court Action Filed:	02/24/2005
Principal Product Type:	Other
Other Product Types:	TRANSFER AGENT SERVICES AND STOCK PLAN ADMINISTRATION SERVICES.
Relief Sought:	Injunction
Other Relief Sought:	CIVIL MONETARY PENALTY; DISGORGEMENT. IN A RELATED SEC ADMINISTRATIVE PROCEEDING, CMTC AGREED TO AN ORDER CENSURING THE FIRM AND AN UNDERTAKING TO ENGAGE AN INDEPENDENT CONSULTANT TO REVIEW ITS RELEVANT BUSINESSES AND PROCEDURES.
Resolution:	Consent
Resolution Date:	02/24/2005
Sanctions Ordered or Relief Granted:	Monetary/Fine \$5,000,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions:	IN A RELATED SEC ADMINISTRATIVE PROCEEDING, CMTC AGREED TO AN



ORDER CENSURING THE FIRM AND AN UNDERTAKING TO ENGAGE AN INDEPENDENT CONSULTANT TO REVIEW ITS RELEVANT BUSINESSES AND PROCEDURES.

Sanction Details:

CMTC WAS PERMANENTLY ENJOINED FROM PRESCRIBED VIOLATIONS OF SECURITIES ACT SECTION 5, EXCHANGE ACT SECTION 10(B) AND RULE 10B-5, EXCHANGE ACT SECTION 15(A), EXCHANGE ACT SECTION 17A(C)(1), AND FROM AIDING AND ABETTING FUTURE VIOLATIONS OF EXCHANGE ACT SECTION 10(B) OR RULE 10B-5. CMTC AGREED TO PAY A CIVIL MONETARY PENALTY OF \$5 MILLION AND DISGORGEMENT OF \$889,773 AND PREJUDGMENT INTEREST OF \$140,270. PAYMENT WAS MADE ON MARCH 4, 2005.

Firm Statement

ON JANUARY 14, 2005, CMTC (AN ENTITY THAT IS 50 PERCENT OWNED BY MELLON CANADA HOLDING COMPANY) SUBMITTED A CONSENT TO ENTRY OF JUDGMENT (THE "CONSENT") WHICH WAS PRESENTED BY THE SEC IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA (THE "COURT") ON FEBRUARY 16, 2005. IN THE CONSENT, AND SOLELY FOR THE PURPOSE OF INJUNCTIVE ACTION AND ANY OTHER PROCEEDINGS ARISING OUT OF THE SEC'S INVESTIGATION BROUGHT BY OR ON BEHALF OF THE SEC, OR TO WHICH THE SEC IS A PARTY, CMTC CONSENTED TO THE ENTRY OF FINAL JUDGMENT AS TO DEFENDANT CMTC (THE "FINAL JUDGMENT") WITHOUT ADMITTING OR DENYING THE MATTERS SET FORTH THEREIN (OTHER THAN THOSE RELATING TO THE JURISDICTION OF THE COURT AND THE SUBJECT MATTER OF THE ACTION). THE FINAL JUDGMENT RESOLVED THE ALLEGATIONS SET FORTH IN A COMPLAINT FILED BY THE SEC, DESCRIBED IN ITEM 7 ABOVE. THE COURT ENTERED THE FINAL JUDGMENT ON FEBRUARY 24, 2005. IN ADDITION TO THE PAYMENT OF A CIVIL MONETARY PENALTY AND DISGORGEMENT, CMTC CONSENTED TO THE ENTRY OF AN SEC ADMINISTRATIVE ORDER BASED ON THE FINAL JUDGMENT THAT CENSURED IT AND TO AN UNDERTAKING TO ENGAGE AN INDEPENDENT CONSULTANT TO REVIEW ITS RELEVANT BUSINESSES AND PROCEDURES.



Civil - Pending

Disclosure 1 of 5

Reporting Source:	Firm
Affiliate:	THE BANK OF NEW YORK MELLON CORPORATION
Current Status:	Pending
Allegations:	THE LAWSUIT ALLEGES THAT THE BANK OF NEW YORK MELLON CORPORATION ("BNY MELLON") IMPROPERLY CHARGED AND REPORTED PRICES FOR STANDING INSTRUCTION FOREIGN EXCHANGE ("FX") TRANSACTIONS EXECUTED IN CONNECTION WITH CUSTODY SERVICES PROVIDED BY BNY MELLON. THE REGISTRANT IS NOT A DEFENDANT TO THIS ACTION.
Initiated By:	ATTORNEY GENERAL FOR THE STATE OF FLORIDA
Court Details:	CIRCUIT COURT OF SECOND JUDICIAL CIRCUIT AND IN FOR LEON COUNTY, FLORIDA; 2009 CA 4140
Date Court Action Filed:	08/11/2011
Date Notice/Process Served:	08/11/2011
Principal Product Type:	Other
Other Product Types:	FOREIGN EXCHANGE SERVICES
Relief Sought:	Civil Penalty(ies)/Fine(s)
Other Relief Sought:	MONEY DAMAGES (PRIVATE/CIVIL COMPLAINT)
Firm Statement	ON AUGUST 11, 2011, THE FLORIDA ATTORNEY GENERAL'S OFFICE FILED A COMPLAINT IN INTERVENTION IN A QUI TAM ACTION FILED AGAINST BNY MELLON, THE PARENT COMPANY OF THE REGISTRANT. BNY MELLON BELIEVES THAT THE CLAIMS ASSERTED IN THE ACTIONS ARE WITHOUT MERIT, AND REFLECT A FUNDAMENTAL MISUNDERSTANDING OF THE ROLE OF CUSTODIAN BANKS AND THE OPERATION OF INSTITUTIONAL FX MARKETS. BNY MELLON PLANS TO DEFEND ITSELF VIGOROUSLY ON BEHALF OF ITS SHAREHOLDERS.

Disclosure 2 of 5

Reporting Source:	Firm
Affiliate:	THE BANK OF NEW YORK MELLON CORPORATION
Current Status:	Pending
Allegations:	THE LAWSUIT ALLEGES THAT THE BANK OF NEW YORK MELLON



CORPORATION ("BNY MELLON") IMPROPERLY CHARGED AND REPORTED PRICES FOR STANDING INSTRUCTION FOREIGN EXCHANGE ("FX") TRANSACTIONS EXECUTED IN CONNECTION WITH CUSTODY SERVICES PROVIDED BY BNY MELLON. THE REGISTRANT IS NOT A DEFENDANT TO THIS ACTION.

Initiated By: ATTORNEY GENERAL OF THE COMMONWEALTH OF VIRGINIA

Court Details: CIRCUIT COURT FOR COUNTY OF FAIRFAX, VIRGINIA; CL-2009-15377

Date Court Action Filed: 08/11/2011

Date Notice/Process Served: 08/11/2011

Principal Product Type: Other

Other Product Types: FOREIGN EXCHANGE SERVICES

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

Other Relief Sought: MONEY DAMAGES (PRIVATE/CIVIL COMPLAINT)

Firm Statement ON AUGUST 11, 2011, THE VIRGINIA ATTORNEY GENERAL'S OFFICE FILED A COMPLAINT IN INTERVENTION IN A QUI TAM ACTION FILED AGAINST BNY MELLON, THE PARENT COMPANY OF THE REGISTRANT. BNY MELLON BELIEVES THAT THE CLAIMS ASSERTED IN THE ACTIONS ARE WITHOUT MERIT, AND REFLECT A FUNDAMENTAL MISUNDERSTANDING OF THE ROLE OF CUSTODIAN BANKS AND THE OPERATION OF INSTITUTIONAL FX MARKETS. BNY MELLON PLANS TO DEFEND ITSELF VIGOROUSLY ON BEHALF OF ITS SHAREHOLDERS.

Disclosure 3 of 5

Reporting Source: Firm

Affiliate: THE BANK OF NEW YORK MELLON CORPORATION

Current Status: Pending

Allegations: THE LAWSUIT ALLEGES THAT THE BANK OF NEW YORK MELLON CORPORATION ("BNY MELLON") IMPROPERLY CHARGED AND REPORTED PRICES FOR STANDING INSTRUCTION FOREIGN EXCHANGE ("FX") TRANSACTIONS EXECUTED IN CONNECTION WITH CUSTODY SERVICES PROVIDED BY BNY MELLON. THE REGISTRANT IS NOT A DEFENDANT TO THIS ACTION.

Initiated By: ATTORNEY GENERAL OF THE STATE OF NEW YORK

Court Details: SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK; INDEX NO: 09/114735



Date Court Action Filed: 10/04/2011

Date Notice/Process Served: 10/04/2011

Principal Product Type: Other

Other Product Types: FOREIGN EXCHANGE SERVICES

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

Other Relief Sought: DISGORGEMENT, INJUNCTION, MONEY DAMAGES (PRIVATE/CIVIL COMPLAINT), RESTITUTION, RESTRAINING ORDER

Firm Statement ON OCTOBER 4, 2011, THE NEW YORK ATTORNEY GENERAL'S OFFICE FILED A COMPLAINT AGAINST BNY MELLON, THE PARENT COMPANY OF THE REGISTRANT. THIS COMPLAINT SUPERSEDES A QUI TAM COMPLAINT FILED BY A PRIVATE RELATOR. BNY MELLON BELIEVES THAT THE CLAIMS ASSERTED IN THE ACTIONS ARE WITHOUT MERIT, AND REFLECT A FUNDAMENTAL MISUNDERSTANDING OF THE ROLE OF CUSTODIAN BANKS AND THE OPERATION OF INSTITUTIONAL FX MARKETS. BNY MELLON PLANS TO DEFEND ITSELF VIGOROUSLY ON BEHALF OF ITS SHAREHOLDERS.

Disclosure 4 of 5

Reporting Source: Firm

Affiliate: THE BANK OF NEW YORK MELLON CORPORATION

Current Status: Pending

Allegations: THE LAWSUIT ALLEGES THAT THE BANK OF NEW YORK MELLON CORPORATION ("BNY MELLON") IMPROPERLY CHARGED AND REPORTED PRICES FOR STANDING INSTRUCTION FOREIGN EXCHANGE ("FX") TRANSACTIONS EXECUTED IN CONNECTION WITH CUSTODY SERVICES PROVIDED BY BNY MELLON. THE REGISTRANT IS NOT A DEFENDANT TO THIS ACTION.

Initiated By: UNITED STATES ATTORNEY FOR THE SOUTHERN DISTRICT OF NEW YORK

Court Details: U.S. DISTRICT COURT, SOUTHERN DISTRICT OF NEW YORK; 11-06969

Date Court Action Filed: 10/04/2011

Date Notice/Process Served: 10/04/2011

Principal Product Type: Other

Other Product Types: FOREIGN EXCHANGE SERVICES

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



Other Relief Sought:	INJUNCTION
Firm Statement	ON OCTOBER 4, 2011, THE U.S. ATTORNEY'S OFFICE FOR THE SOUTHERN DISTRICT OF NEW YORK FILED A COMPLAINT IN INTERVENTION IN A QUI TAM ACTION FILED AGAINST BNY MELLON, THE PARENT COMPANY OF THE REGISTRANT. BNY MELLON BELIEVES THAT THE CLAIMS ASSERTED IN THE ACTIONS ARE WITHOUT MERIT, AND REFLECT A FUNDAMENTAL MISUNDERSTANDING OF THE ROLE OF CUSTODIAN BANKS AND THE OPERATION OF INSTITUTIONAL FX MARKETS. BNY MELLON PLANS TO DEFEND ITSELF VIGOROUSLY ON BEHALF OF ITS SHAREHOLDERS.

Disclosure 5 of 5

Reporting Source:	Firm
Affiliate:	THE BANK OF NEW YORK MELLON CORPORATION
Current Status:	Pending
Allegations:	THE LAWSUIT ALLEGES THAT THE BANK OF NEW YORK MELLON CORPORATION ("BNY MELLON") IMPROPERLY CHARGED AND REPORTED PRICES FOR STANDING INSTRUCTION FOREIGN EXCHANGE ("FX") TRANSACTIONS EXECUTED IN CONNECTION WITH CUSTODY SERVICES PROVIDED BY BNY MELLON. THE REGISTRANT IS NOT A DEFENDANT TO THIS ACTION.
Initiated By:	POLITICAL SUBDIVISIONS OF STATE OF CALIFORNIA
Court Details:	SUPERIOR COURT OF STATE OF CALIFORNIA, COUNTY OF ALAMEDA; RG09480749
Date Court Action Filed:	10/14/2011
Date Notice/Process Served:	10/14/2011
Principal Product Type:	Other
Other Product Types:	FOREIGN EXCHANGE SERVICES
Relief Sought:	Cease and Desist
Other Relief Sought:	CIVIL PENALTY(IES)/FINE(S), MONEY DAMAGES (PRIVATE/CIVIL COMPLAINT)
Firm Statement	ON OCTOBER 14, 2011, FOUR CALIFORNIA PENSION PLANS INTERVENED IN A QUI TAM ACTION FILED AGAINST BNY MELLON, THE PARENT COMPANY OF THE REGISTRANT. BNY MELLON BELIEVES THAT THE CLAIMS ASSERTED IN THE ACTIONS ARE WITHOUT MERIT, AND REFLECT A FUNDAMENTAL MISUNDERSTANDING OF THE ROLE OF CUSTODIAN BANKS AND THE OPERATION OF INSTITUTIONAL FX MARKETS. BNY MELLON PLANS TO DEFEND ITSELF VIGOROUSLY ON BEHALF OF ITS



SHAREHOLDERS.

End of Report



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