

BrokerCheck Report

BLACKROCK FUND DISTRIBUTION COMPANY

CRD# 146183

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Please be aware that fraudsters may link to BrokerCheck from phishing and similar scam websites, trying to steal your personal information or your money. Make sure you know who you're dealing with when investing, and contact FINRA with any concerns.

For more information read our [investor alert](#) on imposters.

About BrokerCheck®



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

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

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

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

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

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

- **How current is this information?**

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

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

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

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

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

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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.](http://www.finra.org)

BLACKROCK FUND DISTRIBUTION COMPANY

CRD# 146183

SEC# 8-67795

Main Office Location400 HOWARD STREET
SAN FRANCISCO, CA 94105-2618**Mailing Address**400 HOWARD STREET
SAN FRANCISCO, CA 94105-2618**Business Telephone Number**

(415) 908-7362

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 California on 11/06/2007.

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? **No**

The number of disclosures from non-registered control affiliates is 5

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: 12/31/2011

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 California on 11/06/2007.

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.

BLACKROCK FUND DISTRIBUTION COMPANY

Doing business as BLACKROCK FUND DISTRIBUTION COMPANY

CRD# 146183

SEC# 8-67795

Main Office Location

400 HOWARD STREET
SAN FRANCISCO, CA 94105-2618

Mailing Address

400 HOWARD STREET
SAN FRANCISCO, CA 94105-2618

Business Telephone Number

(415) 908-7362



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):	BLACKROCK ASSET MANAGEMENT INTERNATIONAL, INC.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	SHAREHOLDER
Position Start Date	07/2007
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):	BLEVINS, JOHN HOWARD 1983887
Is this a domestic or foreign entity or an individual?	Individual
Position	ASSISTANT SECRETARY
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):	CONNOLLY, ROBERT PETER 2024363
Is this a domestic or foreign entity or an individual?	Individual
Position	SECRETARY
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? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): CORLISS, STEPHEN FREDERICK
4721275

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

Position COO

Position Start Date 11/2007

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): FINK, LAURENCE DOUGLAS
830137

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

Position CHAIRMAN/DIRECTOR

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): FROIO, RICHARD FRANCIS SR.

Firm Profile



Direct Owners and Executive Officers (continued)

	2214598
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF COMPLIANCE OFFICER
Position Start Date	11/2007
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):	GREENBERG, PAUL JAY 2460376
Is this a domestic or foreign entity or an individual?	Individual
Position	FINANCIAL AND OPERATIONS PRINCIPAL/CFO
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):	KAPITO, ROBERT STEVEN 728399
Is this a domestic or foreign entity or an individual?	Individual
Position	DIRECTOR
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? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): LATHAM, MICHAEL ARTHUR
4547654

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

Position CHIEF EXECUTIVE OFFICER

Position Start Date 01/2010

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): SLANE, TERRI LYNN
3133346

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

Position ASSISTANT SECRETARY

Position Start Date 11/2007

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): STELLEY, JOHN C.



Firm Profile

Direct Owners and Executive Officers (continued)

Is this a domestic or foreign entity or an individual?	Individual
Position	ASSISTANT SECRETARY
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): WALTCHER, DANIEL R

Is this a domestic or foreign entity or an individual?	Individual
Position	DIRECTOR
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): WALTCHER, DANIEL R

Is this a domestic or foreign entity or an individual?	Individual
Position	ASSISTANT SECRETARY
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

Firm Profile



Direct Owners and Executive Officers (continued)

Company #

Legal Name & CRD# (if any):	WOODARD, SUSAN LAWSON 4225106
Is this a domestic or foreign entity or an individual?	Individual
Position	MSRB PRINCIPAL
Position Start Date	04/2008
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



Firm Profile

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

Indirect Owners

Legal Name & CRD# (if any):	BLACKROCK FINANCIAL MANAGEMENT, INC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	BLACKROCK HOLDCO 4, LLC
Relationship to Direct Owner	SOLE SHAREHOLDER
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?	No

Legal Name & CRD# (if any):	BLACKROCK HOLDCO 2, INC.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	BLACKROCK FINANCIAL MANAGEMENT, INC.
Relationship to Direct Owner	SOLE SHAREHOLDER
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?	No

Legal Name & CRD# (if any):	BLACKROCK HOLDCO 4, 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 BLACKROCK HOLDCO 6, LLC

Relationship to Direct Owner SHAREHOLDER

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? No

Legal Name & CRD# (if any): BLACKROCK HOLDCO 6, LLC

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

Company through which indirect ownership is established DELAWARE HOLDING CO.

Relationship to Direct Owner SOLE SHAREHOLDER

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? No

Legal Name & CRD# (if any): BLACKROCK, INC.

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

Company through which indirect ownership is established BLACKROCK HOLDCO 2, INC.

Relationship to Direct Owner SOLE SHAREHOLDER

Relationship Established 12/2009



Firm Profile

Indirect Owners (continued)

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): DELAWARE HOLDING CO.

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

Company through which indirect ownership is established BLACKROCK ASSET MANAGEMENT INTERNATIONAL, INC

Relationship to Direct Owner SOLE SHAREHOLDER

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? 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 06/13/2008 to 03/05/2012.



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 4 types of businesses.

Types of Business

Mutual fund retailer

Municipal securities broker

Private placements of securities

Other - THE APPLICANTS BROKER-DEALER ACTIVITIES WILL INCLUDE THE OFFER OF ISHARES ETFS AND SELECT MUTUAL FUNDS TO INSTITUTIONAL CLIENTS, BROKER-DEALERS, AND INVESTMENT ADVISERS; THE FACILITATION OF THE ISHARES FAMILY OF ETFS THROUGH SELECT 529 PLAN PLATFORMS; THE OPERATION OF A CALL CENTER TO ANSWER QUESTIONS RELATING TO ISHARES ETFS; INSTITUTIONAL MONEY MARKET MUTUAL FUNDS; AND THE CREATION, REVIEW AND APPROVAL OF MARKETING AND SALES LITERATURE RELATED TO SUCH PRODUCTS.

Other Types of Business

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

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

Non-Securities Business Description:

Firm Operations



Clearing Arrangements

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

Introducing Arrangements

This firm does not refer or introduce customers to other brokers and dealers.

Firm Operations

Industry Arrangements



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

Name: PNC GLOBAL INVESTMENT SERVICING

Business Address: 66 BROADWAY
1ST FLOOR
LYNNFIELD, MA 01940

Effective Date: 11/03/2008

Description: PNC GLOBAL INVESTMENT SERVICING MAINTAINS ELECTRONIC RECORDS OF THE APPLICANT'S ADVERTISING AND SALES LITERATURE, PURSUANT TO NASD RULE 2210 AND SEC RULE 17A-4.

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.

PNC CAPITAL ADVISORS LLC is under common control with the firm.

CRD #:	151829
Business Address:	TWO HOPKINS PLAZA BALTIMORE, MD 21201
Effective Date:	12/01/2009
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	SUBSIDIARY OF COMMON INDIRECT PARENT CORPORATION

BLACKROCK INVESTMENTS, LLC is under common control with the firm.

CRD #:	38642
Business Address:	40 EAST 52ND STREET NEW YORK, NY 10022
Effective Date:	12/01/2009
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF COMMON INDIRECT PARENT CORPORATION, BLACKROCK, INC.

Firm Operations**Organization Affiliates (continued)**

GPC SECURITIES, INC. is under common control with the firm.

CRD #: 14007

Business Address: 1201 PEACHTREE STREET
ATLANTA, GA 30361

Effective Date: 12/01/2009

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: ULTIMATE PARENT COMPANY OF MERRILL LYNCH & CO., INC

FIRST REPUBLIC WEALTH ADVISORS, LLC is under common control with the firm.

CRD #: 132035

Business Address: 111 PINE STREET
SAN FRANCISCO, CA 94111

Effective Date: 12/01/2009

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF MERRILL LYNCH

FIRST REPUBLIC SECURITIES COMPANY, LLC is under common control with the firm.

CRD #: 105108

Business Address: 111 PINE STREET
SAN FRANCISCO, CA 94111

Effective Date: 12/31/2009

Foreign Entity: No

Country:

Firm Operations**Organization Affiliates (continued)**

Securities Activities: Yes

Investment Advisory Activities: No

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF MERRILL LYNCH & CO., INC

FIRST REPUBLIC INVESTMENT MANAGEMENT, INC. is under common control with the firm.

CRD #: 108559

Business Address: 111 PINE STREET
SAN FRANCISCO, CA 94111

Effective Date: 12/01/2009

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF MERRILL LYNCH & CO., INC.

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

CRD #: 146514

Business Address: 55 EAST 52ND STREET
NEW YORK, NY 10022

Effective Date: 12/01/2009

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: SUBSIDIDARY OF COMMON INDIRECT PARENT CORPORATION

PNC REALTY INVESTORS, INC. is under common control with the firm.

CRD #: 139904

Firm Operations**Organization Affiliates (continued)**

Business Address: TWO HOPKINS PLAZA
SUITE 804
BALTIMORE, MD 21201

Effective Date: 12/01/2009

Foreign Entity: No

Country:

Securities Activities: No

**Investment Advisory
Activities:** Yes

Description: SUBSIDIARY OF COMMON INDIRECT PARENT CORPORATION

BLACKROCK INVESTMENT MANAGEMENT, LLC is under common control with the firm.

CRD #: 108928

Business Address: 800 SCUDDERS MILL ROAD
PLAINSBORO, NJ 08536

Effective Date: 12/01/2009

Foreign Entity: No

Country:

Securities Activities: No

**Investment Advisory
Activities:** Yes

Description: SUBSIDIARY OF COMMON INDIRECT PARENT CORPORATION

HARRIS WILLIAMS & CO. is under common control with the firm.

CRD #: 113930

Business Address: 1001 HAXALL POINT
9TH FLOOR
RICHMOND, VA 23219

Effective Date: 12/31/2009

Foreign Entity: No

Country:

Securities Activities: Yes

Firm Operations**Organization Affiliates (continued)**

Investment Advisory Activities: No

Description: SUBSIDIARY OF COMMON INDIRECT PARENT CORPORATION

BLACKROCK KELSO CAPITAL ADVISORS LLC is under common control with the firm.

CRD #: 135051

Business Address: 40 EAST 52ND STREET
NEW YORK, NY 10022

Effective Date: 12/01/2009

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: SUBSIDIARY OF COMMON DIRECT PARENT CORPORATION

BLACKROCK REALTY ADVISORS INC is under common control with the firm.

CRD #: 109457

Business Address: 300 CAMPUS DRIVE
FLORHAM PARK, NJ 07932

Effective Date: 12/01/2009

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: SUBSIDIARY OF COMMON DIRECT PARENT CORPORATION

PNC INVESTMENTS is under common control with the firm.

CRD #: 129052

Business Address: 620 LIBERTY AVENUE
26TH FLOOR
PITTSBURGH, PA 15222

Firm Operations**Organization Affiliates (continued)**

Effective Date: 12/01/2009
Foreign Entity: No
Country:
Securities Activities: Yes
Investment Advisory Activities: Yes
Description: SUBSIDIARY OF COMMON INDIRECT PARENT CORPORATION

BLACKROCK CAPITAL MANAGEMENT, INC. is under common control with the firm.

CRD #: 108069
Business Address: 100 BELLEVUE PARKWAY
 WILMINGTON, DE 19809
Effective Date: 12/01/2009
Foreign Entity: No
Country:
Securities Activities: No
Investment Advisory Activities: Yes
Description: SUBSIDIARY OF COMMON DIRECT PARENT CORPORATION

BLACKROCK INTERNATIONAL LIMITED is under common control with the firm.

CRD #: 106843
Business Address: 40 TORPHICHEN STREET
 EDINBURGH, SCOTLAND EH3 8JB
Effective Date: 12/01/2009
Foreign Entity: Yes
Country: UK
Securities Activities: No
Investment Advisory Activities: Yes
Description: SUBSIDIARY OF COMMON DIRECT PARENT CORPORATION

Firm Operations



Organization Affiliates (continued)

BLACKROCK FINANCIAL MANAGEMENT, INC is under common control with the firm.

CRD #: 107105

Business Address: 40 EAST 52ND STREET
NEW YORK, NY 10022

Effective Date: 12/01/2009

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: SUBSIDIARY OF COMMON DIRECT PARENT CORPORATION

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

CRD #: 106614

Business Address: 100 BELLEVUE PARKWAY
WILMINGTON, DE 19809

Effective Date: 12/01/2009

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: SUBSIDIARY OF COMMON DIRECT PARENT CORPORATION

PNC CAPITAL MARKETS LLC is under common control with the firm.

CRD #: 15647

Business Address: 249 FIFTH AVENUE, 26TH FLOOR
PITTSBURGH, PA 15222

Effective Date: 12/01/2009

Foreign Entity: No

Country:

Firm Operations



Organization Affiliates (continued)

Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF COMMON INDIRECT PARENT CORPORATION

BLACKROCK EXECUTION SERVICES is under common control with the firm.

CRD #:	39438
Business Address:	400 HOWARD STREET SAN FRANCISCO, CA 94105
Effective Date:	10/01/1996
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	APPLICANT AND BLACKROCK EXECUTION SERVICES ARE BOTH WHOLLY-OWNED INDIRECT SUBSIDIARIES OF BLACKROCK, INC.

BLACKROCK FUND ADVISORS is under common control with the firm.

CRD #:	105247
Business Address:	400 HOWARD STREET SAN FRANCISCO, CA 94105
Effective Date:	01/01/1996
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	APPLICANT AND BLACKROCK FUND ADVISORS ARE BOTH WHOLLY OWNED SUBSIDIARIES OF BLACKROCK, INC.

This firm is directly or indirectly, controlled by the following:

- bank holding company

Firm Operations



Organization Affiliates (continued)

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

PNC BANK, N.A. is a National Bank and controls the firm.

Business Address: ONE PNC PLAZA
249 FIFTH AVENUE
PITTSBURGH, PA 15222-2707

Effective Date: 12/01/2009

Description: INDIRECT PARENT CORPORATION

PNC BANCORP, INC. is a Bank Holding Company and controls the firm.

Business Address: ONE PNC PLAZA
249 FIFTH AVENUE
PITTSBURGH, PA 15222-2707

Effective Date: 12/01/2009

Description: INDIRECT PARENT CORPORATION

THE PNC FINANCIAL SERVICES GROUP, INC. is a Bank Holding Company and controls the firm.

Business Address: ONE PNC PLAZA
249 FIFTH AVENUE
PITTSBURGH, PA 15222-2707

Effective Date: 12/01/2009

Description: INDIRECT PARENT CORPROATION



Disclosure Events for Non-Registered Control Affiliates

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

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



Disclosure Event Details

Regulatory - Final

Disclosure 1 of 3

Reporting Source:	Firm
Affiliate:	THE PNC FINANCIAL SERVICES GROUP, INC.
Current Status:	Final
Allegations:	THE COMMISSION ORDER FINDS THAT IN CONNECTION WITH THREE 2001 TRANSACTIONS THAT GAVE RISE TO A FINANCIAL RESTATEMENT ANNOUNCED BY THE PNC FINANCIAL SERVICES GROUP, INC. ("PNC") ON JANUARY 29, 2002, PNC VIOLATED SECTIONS 17(A)(2) & (3) OF THE SECURITIES ACT OF 1933, SECTIONS 13(A) AND 13(B)(2)(A) OF THE SECURITIES ACT OF 1934 AND EXCHANGE ACT RULES 12B-20, 13A-1 AND 13A-13 DUE TO PNC INCORPORATING BY REFERENCE PNC'S FORMS 10-Q FOR THE SECOND AND THIRD QUARTERS OF 2001 INTO CERTAIN REGISTRATION FORMS FILED BY PNC WITH THE COMMISSION IN THE THIRD AND FOURTH QUARTERS OF 2001; AND VIOLATED EXCHANGE ACTION SECTION 10(B) AND RULE 10B-5 AS A RESULT OF A PNC PRESS RELEASE DATED JANUARY 17, 2002.
Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	07/18/2002
Docket/Case Number:	SEC FILE #3-10838
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:	07/18/2002
Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	THE COMMISSION ORDERED THE PNC FINANCIAL SERVICES GROUP, INC. TO CEASE AND DESIST FROM COMMITTING OR CAUSING VIOLATIONS OR FUTURE VIOLATIONS OF SECTIONS 17(A)(2) AND 17(A)(3) OF THE



SECURITIES ACT, SECTIONS 10(B), 13(A) AND 13(B)(2)(A) OF THE EXCHANGE ACT, AND EXCHANGE ACT RULES 10B-5, 12B-20, 13A-1 AND 13A-13.

Firm Statement

ON JULY 18, 2002, THE COMMISSION ENTERED AN ORDER INSTITUTING PUBLIC ADMINISTRATIVE PROCEEDINGS PURSUANT TO SECTION 8A OF THE SECURITIES ACT AND SECTION 21C OF THE EXCHANGE ACT OF 1934. MAKING FINDINGS AND IMPOSING CEASE-AND-DESIST ORDER ("ORDER") AGAINST THE PNC FINANCIAL SERVICES GROUP, INC. ("PNC"). THE COMMISSION SIMULTANEOUSLY ACCEPTED PNC'S OFFER OF SETTLEMENT, IN WHICH PNC NEITHER ADMITTED NOR DENIED THE FINDINGS CONTAINED IN THE COMMISSION'S ORDER AND CONSENTED TO THE ISSUANCE OF A CEASE-AND-DESIST ORDER. PNC ALSO ENTERED INTO A RELATED AGREEMENT WITH THE FEDERAL RESERVE BANK OF CLEVELAND AND PNC BANK, N.A., PNC'S PRINCIPAL BANK SUBSIDIARY, HAS ENTERED INTO A RELATED AGREEMENT WITH THE OFFICE OF THE COMPTROLLER OF THE CURRENCY. THESE AGREEMENTS ADDRESS ISSUES INVOLVING RISK MANAGEMENT AND FINANCIAL CONTROLS.

Disclosure 2 of 3

Reporting Source:	Firm
Affiliate:	RIGGS BANK, N.A.
Current Status:	Final
Allegations:	FAILURE BY RIGGS BANK, N.A. TO COMPLY WITH THE BANK SECRECY ACT.
Initiated By:	OFFICE OF THE COMPTROLLER OF THE CURRENCY
Date Initiated:	07/16/2003
Docket/Case Number:	2003-79
Principal Product Type:	Other
Other Product Type(s):	NATIONAL BANK
Principal Sanction(s)/Relief Sought:	Undertaking
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	01/27/2005
Sanctions Ordered:	Monetary/Fine \$25,000,000.00



Other Sanctions Ordered:

Sanction Details:

ON MAY 13, 2005, RIGGS BANK, N.A. ("RIGGS BANK") MERGED INTO A NON-BANK SUBSIDIARY OF PNC. UPON THE MERGER, RIGGS BANK BECAME A CONTROL AFFILIATE OF THE REGISTRANT AS A RESULT OF BEING UNDER THE COMMON CONTROL OF PNC. REGISTRANT HAD NO INVOLVEMENT IN THE CONDUCT COMPLAINED OF IN THE INFORMATION OR ORDERS DESCRIBED BELOW. ONE OF THE ORDERS INCLUDED A \$25 MILLION CIVIL MONEY PENALTY, WHICH WAS PAID ON THE SAME DATE AS SUCH ORDER. THE CIVIL MONEY PENALTY WAS CONCURRENT WITH ANOTHER \$25 MILLION CIVIL PENALTY ASSESSED ON THE SAME DATE BY THE FINANCIAL CRIMES ENFORCEMENT NETWORK, THE DIRECTOR OF WHICH HAS AUTHORITY TO DETERMINE WHETHER A FINANCIAL INSTITUTION HAS VIOLATED THE BANK SECRECY ACT ("BSA") AND WHAT, IF ANY, SANCTION IS APPROPRIATE.

Firm Statement

THE OFFICE OF THE COMPTROLLER OF THE CURRENCY ("COMPTROLLER") AND RIGGS BANK ENTERED INTO FOUR CONSENT ORDERS (ONE DATED 7/16/03, TWO DATED 5/13/04 AND ONE DATED 1/27/05) RELATING TO RIGGS BANK'S FAILURE TO COMPLY WITH THE BSA. RIGGS BANK'S VIOLATIONS OF THE BSA COMPLIANCE PROGRAM REQUIREMENTS INCLUDED FAILING TO CORRECT DEFICIENCIES IN (I) ITS INTERNAL CONTROLS, (II) ITS INDEPENDENT BSA COMPLIANCE TESTING SYSTEM, (III) THE OVERSIGHT OF ITS BSA COMPLIANCE PERSONNEL, (IV) ITS BSA TRAINING PROGRAM AND (V) ITS RISK MANAGEMENT PROCEDURES AND FAILING TO FILE ACCURATE OR TIMELY SUSPICIOUS ACTIVITY REPORTS IN TRANSACTIONS INVOLVING SAUDI ARABIAN AND EQUATORIAL GUINEAN OFFICIALS. RELIEF INCLUDED REQUIREMENTS TO ESTABLISH STANDARD POLICIES AND PROCEDURES, LIMITATIONS ON DIVIDENDS, AND REQUIREMENTS FOR CAPITAL AND LIQUIDITY PLANNING.

Disclosure 3 of 3

Reporting Source:

Firm

Affiliate:

RIGGS NATIONAL CORPORATION

Current Status:

Final

Allegations:

REGISTRANT IS A CONTROL AFFILIATE OF THE PNC FINANCIAL SERVICES GROUP, INC. ("PNC"). ON MAY 13, 2005, RIGGS NATIONAL MERGED INTO PNC. UPON THE MERGER, RIGGS NATIONAL BECAME A CONTROL AFFILIATE OF THE REGISTRANT AS A RESULT OF BEING UNDER THE COMMON CONTROL OF PNC. REGISTRANT HAD NO INVOLVEMENT IN THE CONDUCT COMPLAINED OF IN THE ORDERS DESCRIBED BELOW. ON MAY 14, 2004, A CEASE AND DESIST ORDER OF THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM ("BOARD") ALLEGED THAT RIGGS



NATIONAL CORPORATION ("RIGGS NATIONAL") WAS DEFICIENT IN ITS COMPLIANCE WITH FEDERAL LAWS, RULES AND REGULATIONS RELATING TO ANTI-MONEY LAUNDERING POLICIES AND PROCEDURES. ON JANUARY 26, 2005, THE BOARD ISSUED A SECOND CEASE AND DESIST ORDER RELATING TO THE SAME MATTERS.

Initiated By: BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM

Date Initiated: 05/14/2004

Docket/Case Number: 05-003-B-HC

Principal Product Type: Other

Other Product Type(s): BANK HOLDING COMPANY

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

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 01/26/2005

Firm Statement REGISTRANT IS A CONTROL AFFILIATE OF PNC. ON MAY 13, 2005 RIGGS NATIONAL MERGED INTO PNC. UPON THE MERGER, RIGGS NATIONAL BECAME A CONTROL AFFILIATE OF THE REGISTRANT AS A RESULT OF BEING UNDER COMMON CONTROL OF PNC. REGISTRANT HAD NO INVOLVEMENT IN THE CONDUCT COMPLAINED OF IN THE ORDERS DESCRIBED ABOVE.



Criminal - Final Disposition

Disclosure 1 of 2

Reporting Source:	Firm
Affiliate:	RIGGS BANK, N.A.
Current Status:	Final
Status Date:	1/27/2005
Charge Details:	THE INFORMATION ALLEGED THAT RIGGS BANK DID KNOWINGLY AND WILLFULLY (I) FAIL TO REPORT SUSPICIOUS TRANSACTIONS, (II) FAIL TO REPORT SUSPICIOUS TRANSACTIONS IN A TIMELY MANNER AND (III) FAIL TO REPORT SUSPICIOUS TRANSACTIONS IN AN ACCURATE MANNER, RELEVANT TO POSSIBLE VIOLATIONS OF LAW OR REGULATIONS, AS REQUIRED BY THE SECRETARY OF THE TREASURY, IN VIOLATION OF THE BANK SECRECY ACT.
Felony:	Yes
Court Details:	REGISTRANT IS A CONTROL AFFILIATE OF THE PNC FINANCIAL SERVICES GROUP, INC. (PNC). ON 5/13/05 RIGGS BANK, N.A. MERGED INTO A NON-BANK SUBSIDIARY OF PNC. UPON THE MERGER RIGGS BANK BECAME A CONTROL AFFILIATE OF THE REGISTRANT AS A RESULT OF BEING UNDER THE COMMON CONTROL OF PNC. REGISTRANT HAD NO INVOLVEMENT IN THE CONDUCT COMPLAINED OF IN THE INFORMATION OR ORDERS DESCRIBED BELOW. ON 1/26/05 THE U.S. ATTORNEY'S OFFICE FOR THE DISTRICT OF COLUMBIA FILED AN INFORMATION IN THE U.S. DISTRICT COURT FOR DC.
Charge Date:	01/26/2005
Disposition Details:	ON JANUARY 27, 2005, RIGGS BANK PLED GUILTY TO A SINGLE FELONY COUNT OF FAILING TO FILE TIMELY OR ACCURATE SUSPICIOUS ACTIVITY REPORTS. RIGGS BANK AGREED TO PAY A \$16 MILLION FINE, WHICH IT PAID ON MARCH 29, 2005, AND AGREED TO A FIVE-YEAR PERIOD OF CORPORATE PROBATION. THE PROBATION PERIOD TERMINATED ON MAY 13, 2005 UPON THE ACQUISITION OF RIGGS BANK BY A NON-BANK SUBSIDIARY OF REGISTRANT'S AFFILIATE.

Disclosure 2 of 2

Reporting Source:	Firm
Affiliate:	PNC ICLC CORP.
Current Status:	Final



Status Date: 6/23/2004

Charge Details: PNC ICLC CORP. WAS CHARGED WITH A CONSPIRACY TO VIOLATE SECURITIES LAWS, A VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 371, AND ENTERED INTO A DEFERRED PROSECUTION AGREEMENT WITH THE DEPARTMENT OF JUSTICE. EFFECTIVE 06/23/2004, THE CRIMINAL COMPLAINT FILED AGAINST PNC ICLC CORP. ON JUNE 2, 2003 HAS BEEN DISMISSED WITH PREJUDICE.

Felony: Yes

Court Details: UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA - CASE NO. 03 187M

Charge Date: 06/02/2003

Disposition Details: AS PART OF THE DEFERRED PROSECUTION AGREEMENT, THE GOVERNMENT AGREED TO DEFER PROSECUTION ON THE CRIMINAL COMPLAINT FOR TWELVE MONTHS AND WILL SEEK TO DISMISS THE COMPLAINT IF PNC ICLC CORP. AND PNC FULLY COMPLY WITH THE OBLIGATIONS SET FORTH IN THE AGREEMENT. PNC ICLC CORP. HAS AGREED TO PAY THE \$90 MILLION FINE TO ESTABLISH A FUND FOR VICTIM RESTITUTION WHICH SHALL BE FUNDED BY JULY 1, 2003 AND TO PAY A \$25 MILLION FINE TO THE U.S. TREASURY BY JUNE 12, 2003. EFFECTIVE 6/23/2004, THE CRIMINAL COMPLAINT FILED AGAINST PNC ICLC CORP. ON JUNE 2, 2003 HAS BEEN DISMISSED WITH PREJUDICE.

End of Report



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