

BrokerCheck Report

BOWLING GREEN CAPITAL, LLC

CRD# 20148

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Registration and Withdrawal	2
Firm Profile	3 - 7
Firm History	8
Firm Operations	9 - 15
Disclosure Events	16



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

Please contact FINRA with any concerns.

About BrokerCheck®



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

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

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

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

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

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

- **How current is this information?**

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

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

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

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

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

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



BOWLING GREEN CAPITAL, LLC

CRD# 20148

SEC# 8-38102

Main Office Location

590 MADISON AVENUE
39TH FLOOR
NEW YORK, NY 10022

Mailing Address

590 MADISON AVENUE
NEW YORK, NY 10022

Business Telephone Number

212-644-9888

Report Summary for this Firm

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

Firm Profile

This firm is classified as a limited liability company.
This firm was formed in Delaware on 01/21/1999.
Its fiscal year ends in September.

Firm History

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

Firm Operations

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

Disclosure Events

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

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

The following types of disclosures have been reported:

Type	Count
Bond	1

The number of disclosures from non-registered control affiliates is 79

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: 06/28/2001

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



Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Delaware on 01/21/1999.

Its fiscal year ends in September.

Firm Names and Locations

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

BOWLING GREEN CAPITAL, LLC

Doing business as BOWLING GREEN CAPITAL, LLC

CRD# 20148

SEC# 8-38102

Main Office Location

590 MADISON AVENUE
39TH FLOOR
NEW YORK, NY 10022

Mailing Address

590 MADISON AVENUE
NEW YORK, NY 10022

Business Telephone Number

212-644-9888



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): FORSTMANN-LEFF ASSOCIATES, LLC

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

Position SOLE STOCKHOLDER

Position Start Date 06/1987

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): ADELAAR, RICHARD HARVEY
2060363

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

Position MANAGER, SECRETARY

Position Start Date 07/1990

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): BENNETT, PHILIP ROGER
1367524

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

Position MANAGER

Position Start Date 06/1997

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): MAGGIO, SANTO CHARLES
1435081

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

Position MANAGER

Position Start Date 06/1997

Percentage of Ownership Less than 5%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): YU, DANIEL MAN
1760360

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

Position PRESIDENT, ASS'T SECRETARY, CHIEF FINANCIAL OFFICER, MANAGER

Position Start Date 10/1987

Percentage of Ownership Less than 5%

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

Is this a public reporting company? No



Firm Profile

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

Indirect Owners

Legal Name & CRD# (if any):	FORSTMANN-LEFF INTERNATIONAL ASSOCIATES, LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	FORSTMANN-LEFF ASSOCIATES, LLC
Relationship to Direct Owner	SOLE STOCKHOLDER
Relationship Established	06/1997
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):	REFCO GROUP HOLDINGS, INC.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	REFCO GROUP LTD., LLC
Relationship to Direct Owner	STOCKHOLDER
Relationship Established	06/1985
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):	REFCO GROUP, LTD., 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 FORSTMANN-LEFF INTERNATIONAL ASSOCITES, LLC

Relationship to Direct Owner SOLE STOCKHOLDER

Relationship Established 06/1985

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): BENNETT, PHILIP ROGER

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

Company through which indirect ownership is established REFCO GROUP HOLDINGS, INC.

Relationship to Direct Owner STOCKHOLDER

Relationship Established 12/1985

Percentage of Ownership 50% but less than 75%

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.

This firm was previously:	BOWLING GREEN CAPITAL CORPORATION
Date of Succession:	05/13/1999
Predecessor CRD#:	20148
Predecessor SEC#:	8-38102
Description	SOLEY FOR TAX PURPOSES, ON MAY 13, 1999 BOWLING GREEN CAPITAL CORP. ("BGCC")(SEC # 8-38102), WAS REORGANIZED AS A LLC. TO ACCOMPLISH SUCH REORGANIZATION, BGCC WAS MERGED WITH AND INTO BOWLING GREEN CAPITAL, (NEWCO)LLC, A LLC FORMED ON JANUARY 21, 1999 FOR THE SOLE PURPOSE OF MERGING WITH, AND ASSUMING THE BUSINESS (ALL ASSETS AND LIABILITES) OF, BGCC. BOWLING GREEN CAPITAL, LLC, THE COMPANY, IS THE SURVIVING NAME FROM SUCH MERGER. SUCH REORGANIZATION DID NOT RESULT IN A CHANGE OF OWNERSHIP OR CONTROL.

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 04/21/1988 to 07/27/2001.





Firm Operations

Types of Business

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

This firm currently conducts 4 types of businesses.

Types of Business

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

Mutual fund retailer

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

Other - 10T REGISTRANT WILL ACT AS A PLACEMENT AGENT FOR OFFSHORE PRIVATE PLACEMENTS AND UNDERWRITINGS.

Other Types of Business

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

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

Non-Securities Business Description:

Firm Operations



Clearing Arrangements

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

Introducing Arrangements

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

Name:	BEAR STEARNS SECURITIES CORP.
Business Address:	245 PARK AVENUE NEW YORK, NY 10167
Effective Date:	04/21/1988
Description:	ACCOUNTS ARE CLEARED ON A FULLY DISCLOSED BASIS THROUGH BEAR STEARNS SECURITIES CORP., A WHOLLY OWNED AND GUARANTEED SUBSIDIARY OF BEAR STEARNS & CO. INC. BOTH BEAR STEARNS SECURITIES CORP. AND BEAR STEARNS & CO. ARE LOCATED AT 245 PARK AVENUE, NEW YORK, NEW YORK 10167

Firm Operations

Industry Arrangements



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

Name: BEAR STEARNS SECURITIES CORP.

Business Address: 245 PARK AVENUE
NEW YORK, NY 10167

Effective Date: 04/21/1988

Description: ACCOUNTS ARE CLEARED ON A FULLY DISCLOSED BASIS THROUGH BEAR STEARNS SECURITIES CORP., WHOLLY OWNED AND GUARANTEED SUBSIDIARY OF BEAR STEARNS & CO. INC. BOTH ENTITIES ARE LOCATED AT 245 PARK AVENUE, NEW YORK, NEW YORK 10167.

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

Name: BEAR STEARNS SECURITIES CORP.

Business Address: 245 PARK AVENUE
NEW YORK, NY 10167

Effective Date: 04/21/1988

Description: ACCOUNTS ARE CLEARED ON A FULLY DISCLOSED BASIS THROUGH BEAR STEARNS SECURITIES CORP., A WHOLLY OWNED AND GUARANTEED SUBSIDIARY OF BEAR STEARNS & CO. INC. BOTH ENTITIES ARE LOCATED AT 245 PARK AVENUE, NEW YORK, NEW YORK 10167.

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

Name: BEAR STEARNS SECURITIES CORP.

Business Address: 245 PARK AVENUE
NEW YORK, NY 10167

Effective Date: 04/21/1988

Description: ACCOUNTS ARE CLEARED ON A FULLY DISCLOSED BASIS THROUGH BEAR STEARNS SECURITIES CORP., A WHOLLY OWNED AND GUARANTEED SUBSIDIARY OF BEAR STEARNS & CO. INC. BOTH BEAR STEARNS SECURITIES CORP. AND BEAR STEARNS & CO. ARE LOCATED AT 245 PARK AVENUE, NEW YORK, NEW YORK 10167

Control Persons/Financing

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

Firm Operations

Industry Arrangements (continued)

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.**

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

CRD #:	14094
Business Address:	ONE WORLD FINANCIAL CENTER 200 LIBERTY STREET NEW YORK, NY 10281
Effective Date:	08/23/1982
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	BOWLING GREEN CAPITAL, LLC IS UNDER COMMON CONTROL WITH REFCO SECURITIES, LLC, AND REFCO CAPITAL TRADING ADVISERS, LLC. REFCO SECURITIES, LLC AND REFCO CAPITAL TRADING ADVISERS, LLC HAVE THE SAME ADDRESS AND ARE UNDER COMMON CONTROL OF REFCO GROUP LTD., LLC.

FORSTMANN-LEFF ASSOCIATES, LLC controls the firm.

Business Address:	590 MADISON AVENUE NEW YORK, NY 10022
Effective Date:	06/08/1987
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes

Firm Operations



Organization Affiliates (continued)

Description: THE REGISTRANT'S SOLE SHAREHOLDER IS FORSTMANN-LEFF ASSOCIATES, LLC ("FLALLC") A REGISTERED INVESTMENT ADVISER WITH THE SECURITIES AND EXCHANGE COMMISSION.

FORSTMANN-LEFF INTERNATIONAL ASSOCIATES, LLC is under common control with the firm.

Business Address: ONE WORLD FINANCIAL CENTER
200 LIBERTY STREET
NEW YORK, NY 10281

Effective Date: 04/24/1997

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: No

Description: FORSTMANN-LEFF INTERNATIONAL ASSOCIATES, LLC ("INTERNATIONAL") IS THE SOLE SHAREHOLDER OF FORSTMANN-LEFF ASSOCIATES, LLC. REFCO GROUP LTD., LLC, A PROVIDER OF FINANCIAL SERVICES, IS THE SOLE SHAREHOLDER OF INTERNATIONAL. BOTH ARE LOCATED AT THE ABOVE ADDRESS.

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

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



Disclosure Events

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

	Pending	Final	On Appeal
Bond	N/A	1	N/A



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.**

Civil Bond

This type of disclosure event involves a civil bond for the brokerage firm that has been denied, paid, or revoked by a bonding company.

Disclosure 1 of 1

Reporting Source:	Firm
Policy Holder:	REFCO SECURITIES, INC.
Bonding Company Name:	NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURG, PA.
Disposition:	Payout



Disposition Date: 07/15/1996

Payout Details: ON JULY 15, 1996, REFCO SECURITIES INC'S BONDING COMPANY, NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURG, PA. MADE A PAYMENTT OF \$1,315,000.00 TO REFCO SECURITIES, INC. ON A FIDELITY BOND BECAUSE OF THE CONDUCT OF ONE OF REFCO SECURITIES INC'S FORMER EMPLOYEES.

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	58	0
Civil Event	2	19	0



Disclosure Event Details

Regulatory - Final

Disclosure 1 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC. (F/K/A RAY E. FRIEDMAN & CO.)
Current Status:	Final
Allegations:	VIOLATIONS OF RULE 928.
Initiated By:	CHICAGO MERCANTILE EXCHANGE
Date Initiated:	07/19/1973
Docket/Case Number:	INFORMATION BEING RESEARCHED
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	07/19/1973
Sanctions Ordered:	Monetary/Fine \$10,000.00
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 2 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC. (F/K/A RAY E. FRIEDMAN & CO.)
Current Status:	Final
Allegations:	VIOLATION OF RULE 475
Initiated By:	CHICAGO BOARD OF TRADE



Date Initiated: 11/06/1975

Docket/Case Number: 5-INV-137

Principal Product Type: Other

Other Product Type(s): NO INFORMATION AVAILABLE.

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

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 11/06/1975

Sanctions Ordered: Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 3 of 58

Reporting Source: Firm

Affiliate: REFCO, INC. (F/K/A RAY E. FRIEDMAN & CO.)

Current Status: Final

Allegations: VIOLATIONS OF RULES 4(A0(5) AND 6(B) OF THE COMMODITY EXCHANGE ACT AND REGULATIONS 1.31,1.35,1.55 AND 166.3.

Initiated By: COMMODITY, FUTURES AND TRADING COMMISSION

Date Initiated: 01/01/1976

Docket/Case Number: CFTC DOCKET NO. 76-16

Principal Product Type: Futures - Commodity

Other Product Type(s):

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

Other Sanction(s)/Relief Sought: CEASE AND DESIST

Resolution: Settled



Resolution Date:	08/07/1990
Sanctions Ordered:	Monetary/Fine \$220,000.00
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 4 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC. (F/K/A RAY E. FRIEDMAN & CO.)
Current Status:	Final
Allegations:	VIOLATIONS OF RULES 914-937
Initiated By:	CHICAGO MERCANTILE EXCHANGE
Date Initiated:	07/07/1976
Docket/Case Number:	INFORMATION BEING RESEARCHED
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	07/07/1976
Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 5 of 58

Reporting Source:	Firm
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Affiliate:	REFCO, INC. (F/K/A RAY E. FRIEDMAN & CO.)
Current Status:	Final
Allegations:	VIOLATIONS OF RULES 432(I), 432(O) AND 1402E.
Initiated By:	CHICAGO MERCANTILE EXCHANGE
Date Initiated:	06/13/1979
Docket/Case Number:	INFORMATION BEING RESEARCHED
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Other
Resolution Date:	03/13/1979
Sanctions Ordered:	Monetary/Fine Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 6 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATIONS OF RULES 853,432(I), 432(O), 2302E, 1502E, 536, 932 AND 933(G).
Initiated By:	CHICAGO MERCANTILE EXCHANGE
Date Initiated:	12/13/1979
Docket/Case Number:	79-BCC-1013/1014/1017/1026
Principal Product Type:	Other



Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHD. SOME DETAILS SUCH AS DATES ARE APPROXIMATE.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	SUSPENSION
Resolution:	Settled
Resolution Date:	12/13/1979
Sanctions Ordered:	Monetary/Fine \$250,000.00 Suspension
Other Sanctions Ordered:	
Sanction Details:	REFCO, INC. WAS FINED \$250,000 AND IN CONNECTION WITH THIS PROCEEDING, THOMAS H. DITTMER'S MEMBERSHIP PRIVLEDGES WERE SUSPENDED FOR A PERIOD OF 6 MONTHS.
Firm Statement	REFCO, INC. WAS FINED \$250,000 AND IN CONNECTION WITH THIS PROCEEDING, THOMAS H. DITTMER'S MEMBERSHIP PRIVLEDGES WERE SUSPENDED FOR A PERIOD OF 6 MONTHS.

Disclosure 7 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC. (F/K/A RAY E. FRIEDMAN & CO.)
Current Status:	Final
Allegations:	VIOLATION OF RULE 431.02
Initiated By:	CHICAGO BOARD OF TRADE
Date Initiated:	08/05/1980
Docket/Case Number:	INFORMATION BEING RESEARCHED
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Resolution:	Other



Resolution Date:	08/05/1980
Sanctions Ordered:	
Other Sanctions Ordered:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 8 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC. (F/K/A RAY E. FRIEDMAN & CO.)
Current Status:	Final
Allegations:	VIOLATION OF RULE 476.01
Initiated By:	CHICAGO BOARD OF TRADE
Date Initiated:	10/22/1980
Docket/Case Number:	INFORMATION BEING RESEARCHED
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	10/22/1980
Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 9 of 58

Reporting Source:	Firm
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Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATIONS OF RULE 3202E
Initiated By:	CHICAGO MERCANTILE EXCHANGE
Date Initiated:	01/01/1981
Docket/Case Number:	INFORMATION BEING RESEARCHED
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	10/26/1981
Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	INFORMATION NOT AVAILABLE AND OR BEING RESEARCHED.
Sanction Details:	INFORMATION NOT AVAILABLE AND OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND OR BEING RESEARCHED.

Disclosure 10 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATIONS OF RULES 1602E AND 1402E
Initiated By:	CHICAGO MERCANTILE EXCHANGE
Date Initiated:	09/14/1981
Docket/Case Number:	INFORMATION BEING REQUESTED
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.



Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	09/14/1981
Sanctions Ordered:	Monetary/Fine \$9,900.00
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 11 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATION OF RULE 1602E
Initiated By:	CHICAGO MERCANTILE EXCHANGE
Date Initiated:	04/27/1982
Docket/Case Number:	INFORMATION BEING RESEARCHED
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	04/27/1982
Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.



Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
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Disclosure 12 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATIONS OF RULES 432(O) AND 545
Initiated By:	CHICAGO MERCANTILE EXCHANGE
Date Initiated:	01/09/1983
Docket/Case Number:	81-BBC-1012 AND 81-BBC-1013
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	01/19/1983
Sanctions Ordered:	Monetary/Fine \$20,000.00
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 13 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATION OF RULE 2302E
Initiated By:	CHICAGO MERCANTILE EXCHANGE
Date Initiated:	02/17/1983



Docket/Case Number:	INFORMATION BEING RESEARCHED
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	02/17/1983
Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 14 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATIONS OF RULE 431 AND 431.02.
Initiated By:	CHICAGO BOARD OF TRADE
Date Initiated:	03/21/1983
Docket/Case Number:	CASE NO. 82-EX-04
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	03/21/1983



Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED

Disclosure 15 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Initiated By:	COMMODITY, FUTURES, AND TRADE COMMISSION
Date Initiated:	01/01/1985
Docket/Case Number:	CFTC DOCKET NO. 85-R98
Principal Product Type:	Futures - Commodity
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	04/25/1991
Sanctions Ordered:	Monetary/Fine \$3,130.15
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 16 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final



Allegations:	VIOLATIONS OF RULE 5.05.
Initiated By:	NEW YORK COTTON EXCHANGE
Date Initiated:	12/03/1985
Docket/Case Number:	INFORMATION BEING RESEARCHED
Principal Product Type:	Futures - Commodity
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	12/03/1985
Sanctions Ordered:	Monetary/Fine \$5,000.00
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 17 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	INFORMATION NOT AVAILABLE AND/OR BEIGN RESEARCHED.
Initiated By:	COMMODITY, FUTURES AND TRADE COMMISSION
Date Initiated:	01/01/1986
Docket/Case Number:	CFTC DOCKET NO. 86-R225
Principal Product Type:	Futures - Commodity
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)


Other Sanction(s)/Relief Sought:

Resolution:	Order
Resolution Date:	01/01/1987
Sanctions Ordered:	Monetary/Fine \$15,675.00
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 18 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATIONS OF RULE 853 AND 433B
Initiated By:	CHICAGO MERCANTILE EXCHANGE
Date Initiated:	01/09/1986
Docket/Case Number:	85-BCC-1011
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	01/09/1986
Sanctions Ordered:	Monetary/Fine \$2,500.00
Other Sanctions Ordered:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO PAY A \$2,500 SETTLEMENT PAYMENT.
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO PAY A \$2,500 SETTLEMENT PAYMENT.
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC.



AGREED TO PAY A \$2,500 SETTLEMENT PAYMENT.

Disclosure 19 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATION OF RULE 13.02(B)
Initiated By:	COFFEE, SUGAR AND COCOA EXCHNAGE, INC.
Date Initiated:	01/01/1987
Docket/Case Number:	INFORMATION BEING RESEARCHED
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	10/01/1987
Sanctions Ordered:	Monetary/Fine \$2,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO PAY A \$2,000 SETTLEMENT PAYMENT.
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO PAY A \$2,000 SETTLEMENT PAYMENT.

Disclosure 20 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATION OF RULE 11.19
Initiated By:	COFFEE, SUGAR AND COCOA EXCHANGE, INC.



Date Initiated: 01/01/1987

Docket/Case Number: INFORMATION BEING RESEARCHED

Principal Product Type: Other

Other Product Type(s): INFORMATION NOT AVAILABLE AND BEING RESEARCHED.

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

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 09/03/1987

Sanctions Ordered: Monetary/Fine \$3,500.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. MADE A SETTLEMENT PAYMENT OF \$3,500.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. MADE A SETTLEMENT PAYMENT OF \$3,500.

Disclosure 21 of 58

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final

Allegations: VIOLATION OF RULE 4.82 AND 4.89.

Initiated By: COMMODITY EXCHANGE, INC.

Date Initiated: 01/01/1987

Docket/Case Number: INFORMATION BEING RESEARCHED

Principal Product Type: Other

Other Product Type(s): INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

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

Other Sanction(s)/Relief Sought:



Resolution:	Other
Resolution Date:	05/18/1987
Sanctions Ordered:	
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS REFCO, INC. PAID A \$2,500 FINE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS REFCO, INC. PAID A \$2,500 FINE.

Disclosure 22 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	CLAIMANT ALLEGED VIOLATIONS OF THE COMMODITY EXCHANGE ACT BY THE ACCOUNT EXECUTIVE RESPONSIBLE FOR THE ACCOUNT AND LIABILITY ON THE PART OF REFCO, INC. BASED ON FAILURE TO SUPERVISE.
Initiated By:	CFTC REPARATIONS PROCEEDINGS INITIATED BY HAMZA MOHAMED AL-BAHRI
Date Initiated:	12/24/1987
Docket/Case Number:	CFTC DOCKET NO. 88-R95
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Resolution:	Order
Resolution Date:	12/24/1987
Sanctions Ordered:	
Other Sanctions Ordered:	REFCO, INC. WAS ORDERED TO PAY REPARATIONS OF \$818,837.84 PLUS INTEREST TO THE CLAIMANT BASED UPON FINDINGS OF VIOLATIONS OF THE COMMODITY EXCHANGE ACT. REFCO, INC. APPEALED THE DECISION



AND THE CFTC VACATED THE ALJ'S DECISION AND REMANDED THE CASE FOR FUTURE PROCEEDING.

Sanction Details:

REFCO, INC. WAS ORDERED TO PAY REPARATIONS OF \$818,837.84 PLUS INTEREST TO THE CLAIMANT BASED UPON FINDINGS OF VIOLATIONS OF THE COMMODITY EXCHANGE ACT. REFCO, INC. APPEALED THE DECISION AND THE CFTC VACATED THE ALJ'S DECISION AND REMANDED THE CASE FOR FUTURE PROCEEDING.

Firm Statement

REFCO, INC. WAS ORDERED TO PAY REPARATIONS OF \$818,837.84 PLUS INTEREST TO THE CLAIMANT BASED UPON FINDINGS OF VIOLATIONS OF THE COMMODITY EXCHANGE ACT. REFCO, INC. APPEALED THE DECISION AND THE CFTC VACATED THE ALJ'S DECISION AND REMANDED THE CASE FOR FUTURE PROCEEDING.

Disclosure 23 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATION OF RULE 602E
Initiated By:	CHICAGO MERCANTILE EXCHANGE
Date Initiated:	02/09/1988
Docket/Case Number:	INFORMATION BEING RESEARCHED
Principal Product Type:	Options
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	02/09/1988
Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.



Disclosure 24 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATIONS OF SECS. 4G(1) AND 6(B OF THE COMMODITY EXCHANGE ACT AND REGULATION 17/01(B)(6), 17.01(D) AND 166.3.
Initiated By:	COMMODITY FUTURES AND TRADE COMMISSION
Date Initiated:	02/11/1988
Docket/Case Number:	CFTC DOCKET NO. 88-8
Principal Product Type:	Futures - Commodity
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Settled
Resolution Date:	02/11/1988
Sanctions Ordered:	Monetary/Fine \$21,000.00
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 25 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATION OF RULE 15202E
Initiated By:	CHICAGO MERCANTILE EXCHANGE
Date Initiated:	03/04/1988



Docket/Case Number:	INFORMATION BEING RESEARCHED
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	03/04/1988
Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 26 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	THE COMPLAINT ALLEGED THAT CERTAIN ASSOCIATED PESONS AT REFCO, INC. AND PARAGON FUTURES CHURNED CUSTOMER ACCOUNTS AND MISREPRESENTED THAT CORRECTIVE ACTION WOULD BE TAKEN. REFCO, INC. WAS ALLEGED TO BE LIABLE UNDER 2(A0(1) OF THE COMMODITY EXCHANGE ACT, ITS GUARANTEE AGREEMENT WITH PARAGON AND CFTC REGULATION 166.3 ON 02/07/1990 AN ALJ FOUND THAT REFCO, INC. WAS VICARIOUSLY LAIBLE AND IMPOSED A PENALTY OF \$150,000. BOTH SIDE APPELAED.
Initiated By:	COMMODITY FUTURES TRADING COMMISSION
Date Initiated:	06/07/1988
Docket/Case Number:	IN RE PARAGON FUTUTRES, REFCO INC, ET AL
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist


Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 04/21/1992

Sanctions Ordered: Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON APPEAL, THE CFTC REVERSED THE FINDINGS OF CHURNING AND FAILURE TO SUPERVISE AND RESCINDED THE \$150,000 PENALTY. THE CFTC AFFIRMED THE FINDINGS THAT REFCO, INC. WAS LIABLE UNDER RULE 2(A)(1) FOR THE UNAUTHORIZED TRADING OF ONE BROKER, AND IT ORDERED REFCO, INC. TO CEASE AND DESIST FROM FURTHER VIOLATIONS OF RULE 166.2.

Disclosure 27 of 58

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final

Allegations: VIOLATION OF REGULATION 1056.01

Initiated By: CHICAGO BOARD OF TRADE

Date Initiated: 08/05/1988

Docket/Case Number: 87-MSI-53

Principal Product Type: Other

Other Product Type(s): INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

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

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 08/05/1988

Sanctions Ordered: Monetary/Fine \$500.00

Other Sanctions Ordered:



Sanction Details: INFORMATION BEING RESEARCHED.
Firm Statement INFORMATION BEING RESEARCHED.

Disclosure 28 of 58

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final

Allegations: VIOLATION OF RULE 63

Initiated By: NEW YORK COTTON EXCHANGE

Date Initiated: 12/05/1988

Docket/Case Number: INFORMATION BEING RESEARCHED

Principal Product Type: Other

Other Product Type(s): NO INFORMATION AVAILABLE.

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

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 12/05/1988

Sanctions Ordered: Monetary/Fine \$1,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. MADE A \$1,000 SETTLEMENT PAYMENT.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. MADE A \$1,000 SETTLEMENT PAYMENT.

Disclosure 29 of 58

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final



Allegations: VIOLATIONS OF RULE 423

Initiated By: CHICAGO BOARD OF TRADE

Date Initiated: 01/01/1989

Docket/Case Number: 89-EX-219

Principal Product Type: Other

Other Product Type(s): INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

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

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 10/29/1990

Sanctions Ordered: Monetary/Fine \$1,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO A \$1,000 FINE.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO A \$1,000 FINE.

Disclosure 30 of 58

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final

Allegations: CLAIMANT ALLEGED VIOLATIONS OF THE COMMODITY EXCHANGE ACT AT REFCO, INC. AND THE ACCOUNT EXECUTIVE HANDLING HIS ACCOUNT.

Initiated By: CFTC REPARATIONS PROCEEDING INITIATED BY MUSTAFA ZAINY AL-SHAIBI

Date Initiated: 03/20/1989

Docket/Case Number: CFTC DOCKET NO. 89-R-170

Principal Product Type: No Product

Other Product Type(s):



Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Resolution:	Order
Resolution Date:	03/20/1989
Sanctions Ordered:	
Other Sanctions Ordered:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Sanction Details:	REFCO, INC. WAS ORDERED TO PAY REPARATIONS IN THE AMOUNT OF \$92,524.86 PLUS INTEREST. REFCO, INC. APPEALED THE DECISION AND IT WAS VACATED BY THE CFTC AND REMANDED FOR FURTHER PROCEEDINGS.
Firm Statement	REFCO, INC. WAS ORDERED TO PAY REPARATIONS IN THE AMOUNT OF \$92,524.86 PLUS INTEREST. REFCO, INC. APPEALED THE DECISION AND IT WAS VACATED BY THE CFTC AND REMANDED FOR FURTHER PROCEEDINGS.

Disclosure 31 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATION OF RULE 545.02
Initiated By:	CHICAGO BOARD OF TRADE
Date Initiated:	03/24/1989
Docket/Case Number:	INFORMATION BEING RESEARCHED
Principal Product Type:	Other
Other Product Type(s):	NO INFORMATION AVAILABLE
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other



Resolution Date:	03/24/1989
Sanctions Ordered:	Monetary/Fine \$2,000.00
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 32 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATIONS OF RULE 545.02
Initiated By:	CHICAGO BOARD OF TRADE
Date Initiated:	05/16/1989
Docket/Case Number:	INFORMATION BEING RESEARCHED
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	05/16/1989
Sanctions Ordered:	Monetary/Fine \$2,000.00
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 33 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.



Current Status:	Final
Allegations:	VIOLATIONS OF RULES 980.C; 984.C; 32 AND 985.A.2.
Initiated By:	CHICAGO MERCANTILE EXCHANGE
Date Initiated:	10/24/1989
Docket/Case Number:	89-CH8918
Principal Product Type:	Other
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	10/24/1989
Sanctions Ordered:	Monetary/Fine \$50,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO,INC. AGREED TO A \$50,000 FINE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO,INC. AGREED TO A \$50,000 FINE.

Disclosure 34 of 58

Reporting Source:	Firm
Affiliate:	RFCO, INC.
Current Status:	Final
Allegations:	VIOLATION OF RULE 7.28
Initiated By:	NEW YORK COTTON EXCHANGE
Date Initiated:	12/11/1989
Docket/Case Number:	88-109
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVIALABLE AND/OR BEING RESEARCHED.



Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	12/11/1989
Sanctions Ordered:	Monetary/Fine \$5,000.00
Other Sanctions Ordered:	
Sanction Details:	REFCO, INC. AGREED TO A \$5,000 FINE.
Firm Statement	REFCO, INC. AGREED TO A \$5,000 FINE.

Disclosure 35 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATIONS OF RULE 230, 293, 301, 503, AND 504 AND RELATED REGULATIONS.
Initiated By:	CHICAGO BOARD OF TRADE
Date Initiated:	01/01/1990
Docket/Case Number:	90-INV-28
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	09/19/1991
Sanctions Ordered:	Monetary/Fine \$40,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC.



AGREED TO A \$40,000 FINE.

Firm Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC.
AGREED TO A \$40,000 FINE.

Disclosure 36 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATION OF RULE 9.11(B)
Initiated By:	NEW YORK COTTON EXCHANGE
Date Initiated:	01/01/1990
Docket/Case Number:	FC90-043
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVIALABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	01/01/1990
Sanctions Ordered:	Monetary/Fine \$50.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS REFCO, INC. AGREED TO A \$50.00 FINE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS REFCO, INC. AGREED TO A \$50.00 FINE.

Disclosure 37 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final



Allegations: VIOLATION OF RULE 6.21(C)

Initiated By: NEW YORK MERCANTILE EXCHANGE

Date Initiated: 01/01/1990

Docket/Case Number: [90-07](#)

Principal Product Type: Other

Other Product Type(s): INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

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

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 01/01/1990

Sanctions Ordered: Monetary/Fine \$5,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS REFCO, INC. AGREED TO PAY A \$5,000 FINE.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS REFCO, INC. AGREED TO PAY A \$5,000 FINE.

Disclosure 38 of 58

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final

Allegations: VIOLATION OF RULE 13.03(B)

Initiated By: COFFEE, SUGAR & COCOA EXCHANGE, INC.

Date Initiated: 01/01/1990

Docket/Case Number: I90-049

Principal Product Type: Other

Other Product Type(s): NO INFORMATION AVAILABLE.

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


Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 01/01/1990

Sanctions Ordered: Monetary/Fine \$500.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO A \$500 FINE.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO A \$500 FINE.

Disclosure 39 of 58

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final

Allegations: VIOLATION OF RULE 9.11(B)

Initiated By: NEW YORK COTTON EXCHANGE

Date Initiated: 01/01/1990

Docket/Case Number: FC-90-049

Principal Product Type: Other

Other Product Type(s): NO INFORMATION AVAILABLE.

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

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 01/01/1990

Sanctions Ordered: Monetary/Fine \$50.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS REFCO, INC. AGREED TO A \$50.00 FINE.



Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS REFCO, INC. AGREED TO A \$50.00 FINE.
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Disclosure 40 of 58

Reporting Source:	Firm
Affiliate:	REFCO INC.
Current Status:	Final
Allegations:	VIOLATION OF RULE 538
Initiated By:	CHICAGO MERCANTILE EXCHANGE
Date Initiated:	09/05/1990
Docket/Case Number:	90-IQ-4043
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Reprimand
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	09/05/1990
Sanctions Ordered:	
Other Sanctions Ordered:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO A WARNING LETTER.
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO A WARNING LETTER.
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO A WARNING LETTER.

Disclosure 41 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final



Allegations:	VIOLATIONS OF RULE 9.01(A)
Initiated By:	NEW YORK COTTON EXCHANGE
Date Initiated:	10/09/1990
Docket/Case Number:	COTTON-90-065
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Settled
Resolution Date:	10/09/1990
Sanctions Ordered:	Monetary/Fine \$5,000.00
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 42 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATIONS OF RULE 9.10(A)
Initiated By:	NEW YORK COTTON EXCHANGE
Date Initiated:	10/29/1990
Docket/Case Number:	COTON-90-070
Principal Product Type:	Other
Other Product Type(s):	INFRMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)


Other Sanction(s)/Relief Sought:

Resolution:	Settled
Resolution Date:	10/29/1990
Sanctions Ordered:	Monetary/Fine \$500.00
Other Sanctions Ordered:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 43 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATIONS OF RULE 63(F)
Initiated By:	CITRUS ASSOCIATES OF THE NEW YORK COTTON EXCHANGE.
Date Initiated:	12/05/1990
Docket/Case Number:	CITRUS-90-031
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	12/05/1990
Sanctions Ordered:	Monetary/Fine \$1,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS REFCO, INC. AGREED TO A \$1,000 FINE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS REFCO, INC. AGREED TO A \$1,000 FINE.

**Disclosure 44 of 58**

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATIONS OF REGULATIONS 465.01 AND 545.02.
Initiated By:	CHICAGO BOARD OF TRADE.
Date Initiated:	12/31/1990
Docket/Case Number:	90-EX-169
Principal Product Type:	Other
Other Product Type(s):	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	12/13/1990
Sanctions Ordered:	Monetary/Fine \$1,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO A \$1,000 FINE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO A \$1,000 FINE.

Disclosure 45 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	THE CME ALLEGED VARIOUS RECORDKEEPING VIOLATIONS.
Initiated By:	CHICAGO MERCANTILE EXCHANGE



Date Initiated: 01/01/1991

Docket/Case Number: CME NO. MS-88-54

Principal Product Type: No Product

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 01/01/1991

Sanctions Ordered: Monetary/Fine \$50,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO PAY A \$50,000 FINE.

Disclosure 46 of 58

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final

Allegations: THE CBOT ALLEGED VIOLATIONS OF CBOT REGUALTIONS 545.02; 432.01 AND 490.05.

Initiated By: CHICAGO BOARD OF TRADE

Date Initiated: 05/06/1991

Docket/Case Number: CBOT NO. 90-EX-209

Principal Product Type: Futures - Commodity

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Settled



Resolution Date:	05/06/1991
Sanctions Ordered:	Monetary/Fine \$2,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO PAY A \$2,000 FINE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO PAY A \$2,000 FINE.

Disclosure 47 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	CLAIMANT ALLEGED MISREPRESENTATIONS OF THE RISKS OF TRADING AND CHURNING HIS ACCOUNTS.
Initiated By:	NFA ARBITRATION INITIATED BY B. WILHELM (CUSTOMER)
Date Initiated:	10/17/1991
Docket/Case Number:	NFA NO. 91-ARB-162
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	INFORMATION NOT AVIALABLE AND/OR BEING RESEARCHED.
Resolution:	Settled
Resolution Date:	10/07/1991
Sanctions Ordered:	
Other Sanctions Ordered:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 48 of 58



Reporting Source:	Firm
Affiliate:	RECO, INC.
Current Status:	Final
Allegations:	CLAIMANT, AN INTRODUCED CUSTOMER OF REFCO, INC., SOUGHT DAMAGES OF \$150,000 FOR ALLEGED NEGLIGENCE, BREACH OF CONTRACT, BREACH OF FIDUCIARY DUTY, ALLEGED VIOLATIONS OF RULE 10(B) OF THE SECURITIES EXCHANGE ACT, ALLEGED VIOLATIONS OF THE "SUITABILITY RULES" OF THE COMMODITIES TRADING INDUSTRY AND UNAUTHORIZED TRADING. REFCO, INC. DENIED LIABILITY AND CHALLENGED THE NFA'S JURISDICTION BECAUSE THE CLAIM WAS FILED MORE THAN 2 YEARS BEFORE THE TRADING.
Initiated By:	NFA ARBITRATION INITIATED BY ALYCE SIMON (CUSTOMER)
Date Initiated:	06/23/1992
Docket/Case Number:	NFA NO. 92-ARB-123
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	06/23/1992
Sanctions Ordered:	
Other Sanctions Ordered:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 49 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	CLAIMANT ALLEGED THAT ITS ACCOUNT AT RECO, INC. WAS CHURNED AND



SOUGHT DAMAGES IN THE AMOUNT OF \$430,387.50 ON 10/12/1992. REFCO, INC. FILED ITS ANSWER DENYING THE SUBSTANTIVE ALLEGATIONS OF THE CLAIM AND RAISED VARIOUS AFFIRMATIVE DEFENSES.

Initiated By: NFA ARBITRATION BY OTTOMAN TRUST ACCOUNT MANAGER

Date Initiated: 08/25/1992

Docket/Case Number: NFA NO. 92-ARB-137

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 08/25/1992

Sanctions Ordered:

Other Sanctions Ordered: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 50 of 58

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final

Allegations: THE COMPLAINT ALLEGED VIOLATIONS OF CME RULE 433.B

Initiated By: CHICAGO MERCANTILE EXCHANGE

Date Initiated: 11/04/1992

Docket/Case Number: CME NO. 92-1088-FP

Principal Product Type: Futures - Commodity

Other Product Type(s):



Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION
Resolution:	Settled
Resolution Date:	11/04/1992
Sanctions Ordered:	Monetary/Fine \$5,000.00
Other Sanctions Ordered:	RESTITUTION TO AFFECTED CUSTOMERS IN THE AMOUNT OF \$9,375.00
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. AGREED TO PAY A FINE OF \$5,000 AND TO RESTITUTION TO AFFECTED CUSTOMERS IN THE AMOUNT OF \$9,375.

Disclosure 51 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	CLAIMANT ALLEGED UNAUTHORIZED TRADING, CHURNING, NON-DISCLOSURE, AND VIOLATION OF FIDUCIARY RESPONSIBILITY.
Initiated By:	CFTC REPARATIONS PROCEEDING INITIATED BY HUSSEIN M. HACKEL
Date Initiated:	04/17/1993
Docket/Case Number:	DOCKET NO. 93-R109
Principal Product Type:	Futures - Commodity
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	10/19/1987
Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED



Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED

Disclosure 52 of 58

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	THE NYMEX ALLEGED THAT REFCO, INC. VIOLATED RULE 6.21(D)
Initiated By:	NEW YORK MERCANTILE EXCHANGE
Date Initiated:	11/26/1993
Docket/Case Number:	NYMEX NO. 93-15
Principal Product Type:	Futures - Commodity
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	11/26/1993
Sanctions Ordered:	Monetary/Fine \$10,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. PAID A \$10,000 FINE.

Disclosure 53 of 58

Reporting Source:	Firm
Affiliate:	REFCO CAPITAL CORP.
Current Status:	Final
Allegations:	THE SEC ALLEGED THAT REFCO CAPITAL CORP. VIOLATED SECTIONS 5(A)AND 5(C) OF THE ECURITIES ACT OF 1933 BY MANAGING CASH MANAGEMENT ACCOUNTS FOR CERTAIN CUSTOMERS.



Initiated By: SECURITIES AND EXCHANGE COMMISSION
Date Initiated: 08/31/1994
Docket/Case Number: SEC NO. 3-8460
Principal Product Type: No Product
Other Product Type(s):
Principal Sanction(s)/Relief Sought: Cease and Desist
Other Sanction(s)/Relief Sought:
Resolution: Settled
Resolution Date: 08/31/1994
Sanctions Ordered: Cease and Desist/Injunction
Other Sanctions Ordered:
Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATION, REFCO CAPITAL CORP. CONSENTED TO THE ENTRY OF A CEASE AND DESIST ORDER.

Disclosure 54 of 58

Reporting Source: Firm
Affiliate: REFCO, INC.
Current Status: Final
Allegations: THE CFTC COMPLAINT CHARGED REFCO, INC. WITH VIOLATION OF CERTAIN FINANCIAL REPORTING, RECORDKEEPING, AND SEGREGATION PROVISIONS OF THE COMMODITY EXCHANGE ACT AND CFTC REFULATIONS IN RESPECT OF CERTAIN REPORTING AND INVESTMENT PRACTICES OF REFCO, INC. DURING 1990 AND 1991.
Initiated By: COMMODITY FUTURES TRADING COMMISSION
Date Initiated: 12/20/1994
Docket/Case Number: CFTC DOCKET NO. 95-2
Principal Product Type: Futures - Commodity
Other Product Type(s):
Principal Sanction(s)/Relief Sought: Cease and Desist


Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 12/20/1994

Sanctions Ordered: Monetary/Fine \$1,250,000.00
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. PAID A \$1,250,000 FINE AND AGREED TO THE ENTRY OF A CEASE AND DESIST ORDER.

Disclosure 55 of 58

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final

Allegations: THE CFTC COMPLAINT CHARGED REFCO, INC. WITH VIOLATION OF CERTAIN SEGREGATION PROVISIONS OF THE COMMODITY EXCHANGE ACT AND CFTC REGULATIONS WITH RESPECT TO THE AMOUNTS OF CERTAIN FOREIGN COMMODITY POOLS.

Initiated By: COMMODITY FUTURES TRADING COMMISSION

Date Initiated: 01/23/1996

Docket/Case Number: CFTC DOCKET 96-2

Principal Product Type: Futures - Commodity

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 01/23/1996

Sanctions Ordered: Monetary/Fine \$925,000.00

Other Sanctions Ordered: REFCO, INC. ALSO AGREES TO IMPLEMENT CERTAIN SUPERVISORY



PROCEDURES

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO, INC. PAID A FINE OF \$925,000 AND AGREED TO IMPLEMENT CERTAIN SUPERVISORY PROCEDURES.

Disclosure 56 of 58

Reporting Source: Firm

Affiliate: REFCO, INC. (F/K/A RAY E. FRIEDMAN & CO.)

Current Status: Final

Allegations: VIOLATION OF RULE 2502E

Initiated By: CHICAGO MERCHANTILE EXCHANGE

Date Initiated: 01/01/1999

Docket/Case Number: INFORMATION BEING RESEARCHED

Principal Product Type: Other

Other Product Type(s): INFORMATION NOT AVAILABLE AND/OR BEING REASEARCHED.

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

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 01/01/1999

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED

Disclosure 57 of 58

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final

Allegations: VIOLATIONS OF RULE 6.21(C) AND REGULATION 9.11



Initiated By: NEW YORK MERCHANTILE EXCHANGE

Date Initiated: 01/01/1999

Docket/Case Number: INFORMATIONN BEING RESEARCHED

Principal Product Type: Other

Other Product Type(s): INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED

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

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 01/01/1999

Sanctions Ordered: Monetary/Fine \$5,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO,INC. AGREED TO A \$5,000.00 FINE.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, REFCO,INC. AGREED TO A \$5,000.00 FINE.

Disclosure 58 of 58

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final

Allegations: REFCO, INC. ALLEGEDLY FAILED TO COMPLY WITH CFTC REGULATIONS AND CBOT RULES REGARDING ORDER TAKING AND RECORD KEEPING INCLUDING THE APPROPRIATIONS OF ACCOUNT IDENTIFICATIONS ON CUSTOMER ORDERS. REFCO, INC. ALSO ALLEGEDLY FAILED TO ADMINISTER PROPER SUPERVISORY SYSTEMS TO OVERSEE THE PROCESS OF ORDER TAKING AND RECORD KEEPING IN CONNECTION WITH ORDER HANDLING.

Initiated By: COMMODITY FUTURES TRADING ASSOCIATION

Date Initiated: 05/24/1999

Docket/Case Number: CFTC DOCKET NO. 99-12



Principal Product Type: Futures - Commodity

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 05/24/1999

Sanctions Ordered: Monetary/Fine \$6,000,000.00

Other Sanctions Ordered: WITHOUT ADMITTING OR DENYING THE ALLEGAATIONS REFCO,INC. PAID A \$6 MILLION CIVIL MONETARY PENALTY FOR ORDER HANDLING AND RECORD KEEPING VIOLATIONS AND AGREED TO CONDUT A REVIEW OF ITS COMPLIANCE POLICIES AND PROCEDURES. REFCO,INC. ALSO PAID A \$1 MILLION FINE TO THE CBOT AND \$1 MILLION TO FUND AN INDUSTRY WIDE STUDY OF ISSUES ASSOCIATED WITH FUTURES ORDER TRANSMISSION AND ENTRY PROCEDURES.

Sanction Details: REFCO,INC. PAID A \$6 MILLION CIVIL MONETARY PENALTY, A \$1 MILLION PENALTY TO THE CBOT AND \$1 MILLION TO FUND AND INDUSTRY WIDE STUDY OF ISSUES ASSOCIATED WITH FUTURES ORDER TRANSMISSION AND ENTRY PROCEDURES.



Civil - Final

Disclosure 1 of 19

Reporting Source:	Firm
Affiliate:	REFCO, INC. (F/KA/ RAY E. FRIEDMAN & CO.)
Current Status:	Final
Allegations:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Initiated By:	MERRILL KARLEN
Court Details:	USDC/CENT. DIV. SD CIV. NO. 77-3012.
Date Court Action Filed:	01/01/1977
Principal Product Type:	Other
Other Product Types:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Relief Sought:	Other
Other Relief Sought:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Resolution:	Other
Resolution Date:	01/01/1997
Sanctions Ordered or Relief Granted:	
Other Sanctions:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 2 of 19

Reporting Source:	Firm
Affiliate:	REFCO, INC. (F/K/A/ RAY E. FRIEDMAN & CO.)
Current Status:	Final
Allegations:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Initiated By:	ROSEMARIE KARLEN, TRUSTEE FOR THE KARLAN BOYS; AND GIRLS TRUST.
Court Details:	USDC/CENT. DIV SD CIV. NO. 77-3013.
Date Court Action Filed:	01/01/1977



Principal Product Type:	Other
Other Product Types:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Relief Sought:	Other
Other Relief Sought:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Resolution:	Other
Resolution Date:	01/01/1997
Sanctions Ordered or Relief Granted:	
Other Sanctions:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 3 of 19

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	PLAINTIFF SUED REFCO, INC. AND ACLI INTERNATIONAL COMMODITY SERVICES AND EDWIN L. STRELING, FORMER BOKERS FOR REFCO, INC. AND ANOTHER FCM ALLEDGING CHURNING AND FRAUD.
Initiated By:	KENNETH OWEN HORNBAKER
Court Details:	USDC/SDNY 85-CIV-6103
Date Court Action Filed:	01/01/1985
Principal Product Type:	Other
Other Product Types:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Relief Sought:	Civil Penalty(ies)/Fine(s)
Other Relief Sought:	
Resolution:	Settled
Resolution Date:	09/11/1997
Sanctions Ordered or Relief Granted:	Monetary/Fine \$950,000.00

**Other Sanctions:****Sanction Details:** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Firm Statement** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Disclosure 4 of 19****Reporting Source:** Firm**Affiliate:** REFCO, INC.**Current Status:** Final**Allegations:** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Initiated By:** RESOLUTION TRUST CORPORATION (COMMONWEALTH FEDERAL SAVINGS)**Court Details:** USDC/ND FLORIDA DOCKET NO. 89-6572.**Date Court Action Filed:** 01/01/1989**Principal Product Type:** Other**Other Product Types:** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Relief Sought:** Other**Other Relief Sought:** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Resolution:** Settled**Resolution Date:** 01/01/1989**Sanctions Ordered or Relief Granted:****Other Sanctions:** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Sanction Details:** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Firm Statement** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Disclosure 5 of 19****Reporting Source:** Firm**Affiliate:** REFCO, INC.**Current Status:** Final**Allegations:** PLAINTIFF ALLEGED FRAUD, BAD FAITH, CONVERSION AND CONSPIRACY



ARISING OUT OF THE ALLEGED CONVERSION BY AN EMPLOYEE OF AN INTRODUCING BROKER OF REFCO, INC. OF \$5,000 OF THE PLAINTIFF'S FUNDS.

Initiated By: LLEWELLYN L. KELLER (CUSTOMER)

Court Details: DISTRICT COURT OF OKLAHOMA COUNTY, OKLAHOMA DOCKET NO. CJ-89-5207.

Date Court Action Filed: 06/06/1989

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Other

Other Relief Sought: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED

Resolution: Other

Resolution Date: 06/06/1989

Sanctions Ordered or Relief Granted:

Other Sanctions: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 6 of 19

Reporting Source: Firm

Affiliate: REFCO CAPITAL CORP.

Current Status: Final

Allegations: VIOLATIONS OF FEDERAL AND STATE SECURITIES LAW, RICO, NEGLIGENCE, FRAUD, AND CONVERSION ALL STEMMING FROM DEFALCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.

Initiated By: CITY OF LOMA LINDA

Court Details: CV-93-0056-RJK CONSOLIDATED UNDER CASE NO. CV-92-7284-RJK USDC/CENTRAL DIST. OF CA.

Date Court Action Filed: 01/13/1992

Principal Product Type: Futures - Commodity

**Other Product Types:****Relief Sought:** Money Damages (Private/Civil Complaint)**Other Relief Sought:****Resolution:** Settled**Resolution Date:** 12/09/1997**Sanctions Ordered or Relief Granted:** Monetary/Fine \$1,050,000.00**Other Sanctions:****Sanction Details:** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Firm Statement** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Disclosure 7 of 19****Reporting Source:** Firm**Affiliate:** REFCO, INC.**Current Status:** Final**Allegations:** COMPLAINT ALLEGES VIOLATIONS OF RULE 10B-5 UNDER THE SECURITIES AND EXCHANGE ACT, RICO, AND CALIFORNIA CORPORATIONS CODE SECS. 25400 AND 25401, AS WELL AS COMMON LAW FRAUD, BREACH OF FIDUCIARY DUTY AND NEGLIGENCE.**Initiated By:** CITY OF ORANGE (CUSTOMER)**Court Details:** USDC/CENT. DIST CA CASE NO. 92-2141**Date Court Action Filed:** 04/08/1992**Principal Product Type:** Other**Other Product Types:** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED**Relief Sought:** Money Damages (Private/Civil Complaint)**Other Relief Sought:****Resolution:** Other**Resolution Date:** 04/08/1992**Sanctions Ordered or Relief Granted:****Other Sanctions:** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.



Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Reporting Source: Firm

Affiliate: REFCO CAPITAL CORP.

Current Status: Final

Allegations: COMPLAINT ALLEGES VIOLATIONS OF RULE 10B-5 UNDER THE SECURITIES AND EXCHANGE ACT, RICO, AND CALIFORNIA CORPORATIONS CODE SECS. 25400 AND 25401, AS WELL AS COMMON LAW FRAUD, BREACH OF FIDUCIARY DUTY AND NEGLIGENCE.

Initiated By: CITY OF ORANGE (CUSTOMER)

Court Details: USDC/CENT. DIST CA CASE NO. 92-2141

Date Court Action Filed: 04/08/1992

Principal Product Type: Other

Other Product Types: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Resolution: Other

Resolution Date: 04/08/1992

Sanctions Ordered or Relief Granted:

Other Sanctions: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 8 of 19

Reporting Source: Firm

Affiliate: REFCO GROUP, LTD.

Current Status: Final

Allegations: VIOLATION OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD AND CONVERSION, ALL STEMMING FROM



DRFALACATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.

Initiated By: FRANCIS M. LOUSTALET & BD OF COUNTY COMM OF WED COUNTY COLORADO.

Court Details: USDC/CENTRAL DIST. OF CA. DOCKET NO. 92-762-RJK

Date Court Action Filed: 10/09/1992

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Resolution: Settled

Resolution Date: 08/24/1998

Sanctions Ordered or Relief Granted: Monetary/Fine \$900,000.00

Other Sanctions:

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final

Allegations: VIOLATION OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD AND CONVERSION, ALL STEMMING FROM DRFALACATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.

Initiated By: FRANCIS M. LOUSTALET & BD OF COUNTY COMM OF WED COUNTY COLORADO.

Court Details: USDC/CENTRAL DIST. OF CA. DOCKET NO. 92-762-RJK

Date Court Action Filed: 10/09/1992

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)

**Other Relief Sought:****Resolution:** Settled**Resolution Date:** 08/24/1998**Sanctions Ordered or Relief Granted:** Monetary/Fine \$900,000.00**Other Sanctions:****Sanction Details:** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Firm Statement** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Disclosure 9 of 19****Reporting Source:** Firm**Affiliate:** REFCO, INC.**Current Status:** Final**Allegations:** PLAINTIFFS, A CLASS OF INVESTORS IN SEVEN GERMAN COMMODITY POOLS, SEEK ACTUAL DAMAGES OF \$35 MILLION AS A RESULT OF CHURNING, UNAUTHORIZED TRADING AND MISAPPROPRIATION OF POOL ASSETS, UNDER RULE 4D AND 4B OF THE COMMODITY EXCHANGE ACT, RICO, THE ILLINOIS CUSTOMER FRAUD ACT, COMMON LAW FRAUD, BREACH OF FIDUCIARY DUTY AND CONVERSION.**Initiated By:** FRIETSCH (CUSTOMER)**Court Details:** USDC/ND ILLINOIS DOCKET NO. 92 C 6844**Date Court Action Filed:** 10/13/1992**Principal Product Type:** Futures - Commodity**Other Product Types:****Relief Sought:** Money Damages (Private/Civil Complaint)**Other Relief Sought:****Resolution:** Dismissed**Resolution Date:** 09/06/1994**Sanctions Ordered or Relief Granted:****Other Sanctions:**

**Sanction Details:****Disclosure 10 of 19**

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	PLAINTIFF CLAIMED THAT THE LIQUIDATION OF ITS ACCOUNT BY REFCO, INC. WAS IMPROPER UNDER THE COMMODITY EXCHANGE ACT, THE ILLINOIS FRAUD AND DECEPTIVE PRACTICES ACT AND AMOUNTED TO A BREACH OF REFCO, INC.'S CONTRACTUAL AND FIDUCIARY DUTIES AND CONSTITUTED NEGLIGENCE, MISREPRESENTATION AND COMMON LAW FRAUD.
Initiated By:	INTER-ASSET-FINANZ A.G. (CUSTOMER)
Court Details:	USDC/ND ILLINOIS DOCKET NO. 92 C 7833
Date Court Action Filed:	11/30/1992
Principal Product Type:	Futures - Commodity
Other Product Types:	
Relief Sought:	Money Damages (Private/Civil Complaint)
Other Relief Sought:	
Resolution:	Settled
Resolution Date:	11/30/1992
Sanctions Ordered or Relief Granted:	
Other Sanctions:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 11 of 19

Reporting Source:	Firm
Affiliate:	REFCO GROUP LTD.
Current Status:	Final



Allegations: VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD AND CONVERSION, ALL STEMMING FROM DEFALCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.

Initiated By: CITY OF LAQUINTA

Court Details: USDC/CENTRAL DISTRICT OF CA. CV-92-7626-RJK CONSOLIDATED UNDER CASE NO. CV-92-7284-RGK.

Date Court Action Filed: 12/09/1992

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Resolution: Settled

Resolution Date: 07/13/1998

Sanctions Ordered or Relief Granted: Monetary/Fine \$937,500.00

Other Sanctions:

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final

Allegations: VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD AND CONVERSION, ALL STEMMING FROM DEFALCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.

Initiated By: CITY OF LAQUINTA

Court Details: USDC/CENTRAL DISTRICT OF CA. CV-92-7626-RJK CONSOLIDATED UNDER CASE NO. CV-92-7284-RGK.

Date Court Action Filed: 12/09/1992

Principal Product Type: Futures - Commodity

**Other Product Types:****Relief Sought:** Money Damages (Private/Civil Complaint)**Other Relief Sought:****Resolution:** Settled**Resolution Date:** 07/13/1998**Sanctions Ordered or Relief Granted:** Monetary/Fine \$937,500.00**Other Sanctions:****Sanction Details:** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Firm Statement** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Reporting Source:** Firm**Affiliate:** REFCO CAPITAL CORP.**Current Status:** Final**Allegations:** VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD AND CONVERSION, ALL STEMMING FROM DEFALCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.**Initiated By:** CITY OF LAQUINTA**Court Details:** USDC/CENTRAL DISTRICT OF CA. CV-92-7626-RJK CONSOLIDATED UNDER CASE NO. CV-92-7284-RGK.**Date Court Action Filed:** 12/09/1992**Principal Product Type:** Futures - Commodity**Other Product Types:****Relief Sought:** Money Damages (Private/Civil Complaint)**Other Relief Sought:****Resolution:** Settled**Resolution Date:** 07/13/1998**Sanctions Ordered or Relief Granted:** Monetary/Fine \$937,500.00**Other Sanctions:**



Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 12 of 19

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD AND CONVERSION, ALL STEMMING FROM DEFALCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.
Initiated By:	CITY OF INDIO (CUSTOMER)
Court Details:	USDC/CENT. DIST. CA. CV-92-7632-RJK CONSOLIDATED UNDER CASE NO. CV-92-7284-RJK.
Date Court Action Filed:	12/09/1992
Principal Product Type:	Other
Other Product Types:	NO INFORMATION AVAILABLE.
Relief Sought:	Civil Penalty(ies)/Fine(s)
Other Relief Sought:	
Resolution:	Settled
Resolution Date:	10/15/1997
Sanctions Ordered or Relief Granted:	Monetary/Fine \$395,791.00
Other Sanctions:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Reporting Source:	Firm
Affiliate:	REFCO REGULATED COS. INC.
Current Status:	Final
Allegations:	VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO,



NEGLIGENCE, FRAUD AND CONVERSION, ALL STEMMING FROM
DEFALCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S.
WYMER.

Initiated By: CITY OF INDIO (CUSTOMER)

Court Details: USDC/CENT. DIST. CA. CV-92-7632-RJK CONSOLIDATED UNDER CASE NO.
CV-92-7284-RJK.

Date Court Action Filed: 12/09/1992

Principal Product Type: Other

Other Product Types: NO INFORMATION AVAILABLE.

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

Other Relief Sought:

Resolution: Settled

Resolution Date: 10/15/1997

**Sanctions Ordered or Relief
Granted:** Monetary/Fine \$395,791.00

Other Sanctions:

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Reporting Source: Firm

Affiliate: REFCO GROUP LTD.

Current Status: Final

Allegations: VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO,
NEGLIGENCE, FRAUD AND CONVERSION, ALL STEMMING FROM
DEFALCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S.
WYMER.

Initiated By: CITY OF INDIO (CUSTOMER)

Court Details: USDC/CENT. DIST. CA. CV-92-7632-RJK CONSOLIDATED UNDER CASE NO.
CV-92-7284-RJK.

Date Court Action Filed: 12/09/1992

Principal Product Type: Other

Other Product Types: NO INFORMATION AVAILABLE.



Relief Sought:	Civil Penalty(ies)/Fine(s)
Other Relief Sought:	
Resolution:	Settled
Resolution Date:	10/15/1997
Sanctions Ordered or Relief Granted:	Monetary/Fine \$395,791.00
Other Sanctions:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 13 of 19

Reporting Source:	Firm
Affiliate:	REFCO CAPITAL CORP.
Current Status:	Final
Allegations:	VIOLETIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD, AND CONVERSION, ALL STEMMING FROM THE DEFALCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.
Initiated By:	CITY OF SANGER REDEVELOPMENT AGENCY
Court Details:	USDC/CENTRAL DISTRICT OF CA. CASE NO. CV-92-7284-RJK
Date Court Action Filed:	12/19/1992
Principal Product Type:	Futures - Commodity
Other Product Types:	
Relief Sought:	Money Damages (Private/Civil Complaint)
Other Relief Sought:	
Resolution:	Settled
Resolution Date:	12/04/1997
Sanctions Ordered or Relief Granted:	Monetary/Fine \$1,400,000.00
Other Sanctions:	
Sanction Details:	INFORMATION IS NOT AVAILABLE AND/OR BEING RESEARCHED.



Firm Statement INFORMATION IS NOT AVAILABLE AND/OR BEING RESEARCHED.

Reporting Source: Firm

Affiliate: REFCO GROUP, LTD.

Current Status: Final

Allegations: VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD, AND CONVERSION, ALL STEMMING FROM THE DEFALCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.

Initiated By: CITY OF SANGER REDEVELOPMENT AGENCY

Court Details: USDC/CENTRAL DISTRICT OF CA. CASE NO. CV-92-7284-RJK

Date Court Action Filed: 12/19/1992

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Resolution: Settled

Resolution Date: 12/04/1997

Sanctions Ordered or Relief Granted: Monetary/Fine \$1,400,000.00

Other Sanctions:

Sanction Details: INFORMATION IS NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION IS NOT AVAILABLE AND/OR BEING RESEARCHED.

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final

Allegations: VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD, AND CONVERSION, ALL STEMMING FROM THE DEFALCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.



Initiated By:	CITY OF SANGER REDEVELOPMENT AGENCY
Court Details:	USDC/CENTRAL DISTRICT OF CA. CASE NO. CV-92-7284-RJK
Date Court Action Filed:	12/19/1992
Principal Product Type:	Futures - Commodity
Other Product Types:	
Relief Sought:	Money Damages (Private/Civil Complaint)
Other Relief Sought:	
Resolution:	Settled
Resolution Date:	12/04/1997
Sanctions Ordered or Relief Granted:	Monetary/Fine \$1,400,000.00
Other Sanctions:	
Sanction Details:	INFORMATION IS NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION IS NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 14 of 19

Reporting Source:	Firm
Affiliate:	REFCO CAPITAL CORP.
Current Status:	Final
Allegations:	VIOLETIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD, AND CONVERSION ALL STEMING FROM DEFALCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.
Initiated By:	CITY OF PALM DESERT.
Court Details:	USDC/CENTRAL DISTRICT OF CA. CASE NO. 92-CV-7631-RGK
Date Court Action Filed:	12/30/1992
Principal Product Type:	Futures - Commodity
Other Product Types:	
Relief Sought:	Money Damages (Private/Civil Complaint)
Other Relief Sought:	
Resolution:	Settled



Resolution Date: 09/25/1998

Sanctions Ordered or Relief Granted: Monetary/Fine \$5,991,168.92

Other Sanctions:

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final

Allegations: VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD, AND CONVERSION ALL STEMING FROM DEFALCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.

Initiated By: CITY OF PALM DESERT.

Court Details: USDC/CENTRAL DISTRICT OF CA. CASE NO. 92-CV-7631-RGK

Date Court Action Filed: 12/30/1992

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Resolution: Settled

Resolution Date: 09/25/1998

Sanctions Ordered or Relief Granted: Monetary/Fine \$5,991,168.92

Other Sanctions:

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Reporting Source: Firm



Affiliate:	REFCO GROUP, LTD.
Current Status:	Final
Allegations:	VIOALTIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD, AND CONVERSION ALL STEMING FROM DEFALCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.
Initiated By:	CITY OF PALM DESERT.
Court Details:	USDC/CENTRAL DISTRICT OF CA. CASE NO. 92-CV-7631-RGK
Date Court Action Filed:	12/30/1992
Principal Product Type:	Futures - Commodity
Other Product Types:	
Relief Sought:	Money Damages (Private/Civil Complaint)
Other Relief Sought:	
Resolution:	Settled
Resolution Date:	09/25/1998
Sanctions Ordered or Relief Granted:	Monetary/Fine \$5,991,168.92
Other Sanctions:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 15 of 19

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOALTIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD AND CONVERSION, ALL STEMMING FROM DEFALACATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.
Initiated By:	PALM DESERT REDEVELOPMENT AGENCY
Court Details:	USDC/CENTRAL DISTRICT OF CA CASE NO. CV-93-0057-RJK CONSOLIDATED UNDER CASE NO. CV-92-7284-RJK.



Date Court Action Filed: 01/06/1993

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Resolution: Settled

Resolution Date: 09/25/1998

Sanctions Ordered or Relief Granted: Monetary/Fine \$5,100,000.00

Other Sanctions:

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Reporting Source: Firm

Affiliate: REFCO GROUP, LTD.

Current Status: Final

Allegations: VIOALTIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD AND CONVERSION, ALL STEMMING FROM DEFALACATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.

Initiated By: PALM DESERT REDEVELOPMENT AGENCY

Court Details: USDC/CENTRAL DISTRICT OF CA CASE NO. CV-93-0057-RJK
CONSOLIDATED UNDER CASE NO. CV-92-7284-RJK.

Date Court Action Filed: 01/06/1993

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Resolution: Settled

Resolution Date: 09/25/1998



Sanctions Ordered or Relief Granted: Monetary/Fine \$5,100,000.00

Other Sanctions:

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Reporting Source: Firm

Affiliate: REFCO CAPITAL CORP.

Current Status: Final

Allegations: VIOALTIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD AND CONVERSION, ALL STEMMING FROM DEFALACATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.

Initiated By: PALM DESERT REDEVELOPMENT AGENCY

Court Details: USDC/CENTRAL DISTRICT OF CA CASE NO. CV-93-0057-RJK
CONSOLIDATED UNDER CASE NO. CV-92-7284-RJK.

Date Court Action Filed: 01/06/1993

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Resolution: Settled

Resolution Date: 09/25/1998

Sanctions Ordered or Relief Granted: Monetary/Fine \$5,100,000.00

Other Sanctions:

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Reporting Source: Firm

Affiliate: REFCO REGULATED COS.



Current Status:	Final
Allegations:	VIOALTIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD AND CONVERSION, ALL STEMMING FROM DEFALACATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.
Initiated By:	PALM DESERT REDEVELOPMENT AGENCY
Court Details:	USDC/CENTRAL DISCTICT OF CA CASE NO. CV-93-0057-RJK CONSOLIDATED UNDER CASE NO. CV-92-7284-RJK.
Date Court Action Filed:	01/06/1993
Principal Product Type:	Futures - Commodity
Other Product Types:	
Relief Sought:	Money Damages (Private/Civil Complaint)
Other Relief Sought:	
Resolution:	Settled
Resolution Date:	09/25/1998
Sanctions Ordered or Relief Granted:	Monetary/Fine \$5,100,000.00
Other Sanctions:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 16 of 19

Reporting Source:	Firm
Affiliate:	REFCO GROUP, LTD.
Current Status:	Final
Allegations:	VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRUAD, AND CONVERSION, ALL STEMMING FROM DEFELLCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.
Initiated By:	CONCHELLA VALLY JOINT POWERS INSURANCE AUTHORITY
Court Details:	USDC/CENTRAL DISTRICT OF CA CASE NO. CV 92-76300RJK CONSOLIDATED UNDER CASE NO. CV-7284-RJK



Date Court Action Filed: 01/15/1993

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Resolution: Settled

Resolution Date: 09/15/1997

Sanctions Ordered or Relief Granted: Monetary/Fine \$2,500,000.00

Other Sanctions:

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Final

Allegations: VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRUAD, AND CONVERSION, ALL STEMMING FROM DEFELLICATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.

Initiated By: CONCHELLA VALLY JOINT POWERS INSURANCE AUTHORITY

Court Details: USDC/CENTRAL DISTRICT OF CA CASE NO. CV 92-76300RJK
CONSOLIDATED UNDER CASE NO. CV-7284-RJK

Date Court Action Filed: 01/15/1993

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Resolution: Settled

Resolution Date: 09/15/1997



Sanctions Ordered or Relief Granted:	Monetary/Fine \$2,500,000.00
Other Sanctions:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Reporting Source:	Firm
Affiliate:	REFCO CAPITAL CORP.
Current Status:	Final
Allegations:	VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRUAD, AND CONVERSION, ALL STEMMING FROM DEFELLCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.
Initiated By:	CONCHELLA VALLY JOINT POWERS INSURANCE AUTHORITY
Court Details:	USDC/CENTRAL DISTRICT OF CA CASE NO. CV 92-76300RJK CONSOLIDATED UNDER CASE NO. CV-7284-RJK
Date Court Action Filed:	01/15/1993
Principal Product Type:	Futures - Commodity
Other Product Types:	
Relief Sought:	Money Damages (Private/Civil Complaint)
Other Relief Sought:	
Resolution:	Settled
Resolution Date:	09/15/1997
Sanctions Ordered or Relief Granted:	Monetary/Fine \$2,500,000.00
Other Sanctions:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 17 of 19

Reporting Source:	Firm
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Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Initiated By:	CITY OF ORANGE (CUSTOMER)
Court Details:	CASE NO. 701396 SUP CT. ORANGE CO., CA
Date Court Action Filed:	02/23/1993
Principal Product Type:	Other
Other Product Types:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED
Relief Sought:	Civil Penalty(ies)/Fine(s)
Other Relief Sought:	
Resolution:	Settled
Resolution Date:	08/07/1995
Sanctions Ordered or Relief Granted:	Monetary/Fine \$4,253,000.00
Other Sanctions:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Reporting Source:	Firm
Affiliate:	REFCO CAPITAL CORP.
Current Status:	Final
Allegations:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Initiated By:	CITY OF ORANGE (CUSTOMER)
Court Details:	CASE NO. 701396 SUP CT. ORANGE CO., CA
Date Court Action Filed:	02/23/1993
Principal Product Type:	Other
Other Product Types:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED
Relief Sought:	Civil Penalty(ies)/Fine(s)
Other Relief Sought:	



Resolution:	Settled
Resolution Date:	08/07/1995
Sanctions Ordered or Relief Granted:	Monetary/Fine \$4,253,000.00
Other Sanctions:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 18 of 19

Reporting Source:	Firm
Affiliate:	REFCO, INC.
Current Status:	Final
Allegations:	VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD AND CONVERSION ALL STEMING FROM THE DELICATIONS OF CONVICTED INVESTMENT ADVISER S. WYMER.
Initiated By:	CITY F TORRANCE
Court Details:	USDC/CENTRAL DISCRICT OF CA CASE NO. CV-92-7294-RJK CONSOLIDATED UNDER CASE NO. CV-92-7284-RJK.
Date Court Action Filed:	04/30/1993
Principal Product Type:	Futures - Commodity
Other Product Types:	
Relief Sought:	Money Damages (Private/Civil Complaint)
Other Relief Sought:	
Resolution:	Settled
Resolution Date:	03/22/1996
Sanctions Ordered or Relief Granted:	Monetary/Fine \$161,800.00
Other Sanctions:	
Sanction Details:	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.
Firm Statement	INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.



Reporting Source: Firm

Affiliate: REFCO CAPITAL CORP.

Current Status: Final

Allegations: VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD AND CONVERSION ALL STEMING FROM THE DELICATIONS OF CONVICTED INVESTMENT ADVISER S. WYMER.

Initiated By: CITY F TORRANCE

Court Details: USDC/CENTRAL DISCRICT OF CA CASE NO. CV-92-7294-RJK
CONSOLIDATED UNDER CASE NO. CV-92-7284-RJK.

Date Court Action Filed: 04/30/1993

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Resolution: Settled

Resolution Date: 03/22/1996

Sanctions Ordered or Relief Granted: Monetary/Fine \$161,800.00

Other Sanctions:

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Reporting Source: Firm

Affiliate: REFCO GROUP, LTD.

Current Status: Final

Allegations: VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD AND CONVERSION ALL STEMING FROM THE DELICATIONS OF CONVICTED INVESTMENT ADVISER S. WYMER.

Initiated By: CITY F TORRANCE

Court Details: USDC/CENTRAL DISCRICT OF CA CASE NO. CV-92-7294-RJK
CONSOLIDATED UNDER CASE NO. CV-92-7284-RJK.



Date Court Action Filed: 04/30/1993

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Resolution: Settled

Resolution Date: 03/22/1996

Sanctions Ordered or Relief Granted: Monetary/Fine \$161,800.00

Other Sanctions:

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Disclosure 19 of 19

Reporting Source: Firm

Affiliate: REFCO CAPITAL CORP.

Current Status: Final

Allegations: VIOLATIONS OF COLORADO STATE, RICO, COLORADO STATE SECURITIES FRAUD, CIVIL CONSPIRACY, FRAUD CONVERSION, NEGLIGENCE AND BREACH OF FIDUCIARY DUTY.

Initiated By: HERMAN MEINDERS; EDWARD L. NORTHWAY; AMERICAN FLORAL SEVICES

Court Details: 94-CIV-979 DIVISION 9, DISTRICT CO., JEFFERSON CO, COLORADO

Date Court Action Filed: 06/22/1994

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Resolution: Settled

Resolution Date: 12/22/1997

Sanctions Ordered or Relief Granted: Monetary/Fine \$205,000.00

**Other Sanctions:****Sanction Details:** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Firm Statement** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Reporting Source:**

Firm

Affiliate:

REFCO, INC.

Current Status:

Final

Allegations:

VIOLATIONS OF COLORADO STATE, RICO, COLORADO STATE SECURITIES
FRAUD, CIVIL CONSPIRACY, FRAUD CONVERSION, NEGLIGENCE AND
BREACH OF FIDUCIARY DUTY.

Initiated By:

HERMAN MEINDERS; EDWARD L. NORTHWAY; AMERICAN FLORAL SEVICES

Court Details:

94-CIV-979 DIVISION 9, DISTRICT CO., JEFFERSON CO, COLORADO

Date Court Action Filed:

06/22/1994

Principal Product Type:

Futures - Commodity

Other Product Types:**Relief Sought:**

Money Damages (Private/Civil Complaint)

Other Relief Sought:**Resolution:**

Settled

Resolution Date:

12/22/1997

**Sanctions Ordered or Relief
Granted:**

Monetary/Fine \$205,000.00

Other Sanctions:**Sanction Details:** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Firm Statement** INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.**Reporting Source:**

Firm

Affiliate:

REFCO GROUP, LTD.

Current Status:

Final

Allegations:

VIOLATIONS OF COLORADO STATE, RICO, COLORADO STATE SECURITIES
FRAUD, CIVIL CONSPIRACY, FRAUD CONVERSION, NEGLIGENCE AND



BREACH OF FIDUCIARY DUTY.

Initiated By: HERMAN MEINDERS; EDWARD L. NORTHWAY; AMERICAN FLORAL SEVICES

Court Details: 94-CIV-979 DIVISION 9, DISTRICT CO., JEFFERSON CO, COLORADO

Date Court Action Filed: 06/22/1994

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Resolution: Settled

Resolution Date: 12/22/1997

Sanctions Ordered or Relief Granted: Monetary/Fine \$205,000.00

Other Sanctions:

Sanction Details: INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.

Firm Statement INFORMATION NOT AVAILABLE AND/OR BEING RESEARCHED.



Civil - Pending

Disclosure 1 of 2

Reporting Source: Firm

Affiliate: REFCO CAPITAL CORP.

Current Status: Pending

Allegations: VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD, AND CONVERSION, ALL STEMMING FROM DEFALCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.

Initiated By: CITY OF BIG BEAR LAKE

Court Details: USDC/CENTRAL DISTRICT OF CA. CASE NO. CV-92-7633-RJK CONSOLIDATED UNDER CASE NO. CV-92-7284-RJK.

Date Court Action Filed: 12/30/1992

Date Notice/Process Served: 01/01/1992

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Firm Statement REFCO, INC. FAILED A MOTION TO DISMISS PARTS OF THE COMPLAINT, WHICH WAS GRANTED. THE PLAINTIFF AMENDE HIS COMPLAINT IN 1996 BUT HAS NOT ACTIVELY TAKEDN STEPS TO PROSECUTE THE CASE.

Reporting Source: Firm

Affiliate: REFCO REGULATED COS.

Current Status: Pending

Allegations: VIOLATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD, AND CONVERSION, ALL STEMMING FROM DEFALCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.

Initiated By: CITY OF BIG BEAR LAKE

Court Details: USDC/CENTRAL DISTRICT OF CA. CASE NO. CV-92-7633-RJK CONSOLIDATED UNDER CASE NO. CV-92-7284-RJK.



Date Court Action Filed: 12/30/1992
Date Notice/Process Served: 01/01/1992
Principal Product Type: Futures - Commodity
Other Product Types:
Relief Sought: Money Damages (Private/Civil Complaint)
Other Relief Sought:
Firm Statement REFCO, INC. FAILED A MOTION TO DISMISS PARTS OF THE COMPLAINT, WHICH WAS GRANTED. THE PLAINTIFF AMENDE HIS COMPLAINT IN 1996 BUT HAS NOT ACTIVELY TAKEDN STEPS TO PROSECUTE THE CASE.

Reporting Source: Firm
Affiliate: REFCO, INC.
Current Status: Pending
Allegations: VILATIONS OF FEDERAL AND STATE SECURITIES LAWS, RICO, NEGLIGENCE, FRAUD, AND CONVERSION, ALL STEMMING FROM DEFALCATIONS COMMITTED BY CONVICTED INVESTMENT ADVISER S. WYMER.
Initiated By: CITY OF BIG BEAR LAKE
Court Details: USDC/CENTRAL DISTRICT OF CA. CASE NO. CV-92-7633-RJK CONSOLIDATED UNDER CASE NO. CV-92-7284-RJK.
Date Court Action Filed: 12/30/1992
Date Notice/Process Served: 01/01/1992
Principal Product Type: Futures - Commodity
Other Product Types:
Relief Sought: Money Damages (Private/Civil Complaint)
Other Relief Sought:
Firm Statement REFCO, INC. FAILED A MOTION TO DISMISS PARTS OF THE COMPLAINT, WHICH WAS GRANTED. THE PLAINTIFF AMENDE HIS COMPLAINT IN 1996 BUT HAS NOT ACTIVELY TAKEDN STEPS TO PROSECUTE THE CASE.

Disclosure 2 of 2

Reporting Source: Firm



Affiliate: REFCO CAPITAL CORP.

Current Status: Pending

Allegations: VIOLATIONS OF COLORADO ORGANIZED CRIMES CONRTROL ACT, CIVIL CONSPIRACY, COLORADO STATE SECURITIES FRUAD, NEGLIGENCE, FALSE REPRESENTATION, FRAUDELENT CONCEALMENT, BREACH OF FIDUCIARY DUTY, CONVERSION, BREACH OF CONTRACT, INDEMNIFICATION AS WELL AS AIDING AND ABETTING SECURITIES FRAUD.

Initiated By: JEFFERSON BANK AND TRUST

Court Details: CASE NO. 93-B-85

Date Court Action Filed: 02/23/1993

Date Notice/Process Served: 01/01/1983

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Firm Statement ACTION IS PROCEEDING TO TRIAL.

Reporting Source: Firm

Affiliate: REFCO, INC.

Current Status: Pending

Allegations: VIOLATIONS OF COLORADO ORGANIZED CRIMES CONRTROL ACT, CIVIL CONSPIRACY, COLORADO STATE SECURITIES FRUAD, NEGLIGENCE, FALSE REPRESENTATION, FRAUDELENT CONCEALMENT, BREACH OF FIDUCIARY DUTY, CONVERSION, BREACH OF CONTRACT, INDEMNIFICATION AS WELL AS AIDING AND ABETTING SECURITIES FRAUD.

Initiated By: JEFFERSON BANK AND TRUST

Court Details: CASE NO. 93-B-85

Date Court Action Filed: 02/23/1993

Date Notice/Process Served: 01/01/1983

Principal Product Type: Futures - Commodity

Other Product Types:

Relief Sought: Money Damages (Private/Civil Complaint)



Other Relief Sought:

Firm Statement	ACTION IS PROCEEDING TO TRIAL.
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Reporting Source:	Firm
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Affiliate:	REFCO GROUP LTD.
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Current Status:	Pending
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Allegations:	VIOLETIONS OF COLORADO ORGANIZED CRIMES CONRTROL ACT, CIVIL CONSPIRACY, COLORADO STATE SECURITIES FRUAD, NEGLIGENCE, FALSE REPRESENTATION, FRAUDELENT CONCEALMENT, BREACH OF FIDUCIARY DUTY, CONVERSION, BREACH OF CONTRACT, INDEMNIFICATION AS WELL AS AIDING AND ABETTING SECURITIES FRAUD.
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Initiated By:	JEFFERSON BANK AND TRUST
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Court Details:	CASE NO. 93-B-85
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Date Court Action Filed:	02/23/1993
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Date Notice/Process Served:	01/01/1983
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Principal Product Type:	Futures - Commodity
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Other Product Types:	
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Relief Sought:	Money Damages (Private/Civil Complaint)
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Other Relief Sought:	
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Firm Statement	ACTION IS PROCEEDING TO TRIAL.
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End of Report



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