

BrokerCheck Report

MISSIONSQUARE INVESTMENT SERVICES

CRD# 23189

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



When communicating online or investing with any professional, make sure you know who you're dealing with. [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:
 - o information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
 - o information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

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

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

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

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

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

• **Thank you for using FINRA BrokerCheck.**



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at brokercheck.finra.org



For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit www.finra.org.



MISSIONSQUARE INVESTMENT SERVICES

CRD# 23189

SEC# 8-40268

Main Office Location

777 NORTH CAPITOL STREET, NE
SUITE 600
WASHINGTON, DC 20002-4240
Regulated by FINRA Philadelphia Office

Mailing Address

777 NORTH CAPITOL STREET, NE
SUITE 600
WASHINGTON, DC 20002-4240

Business Telephone Number

202-962-4600

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 12/31/1998.

Its fiscal year ends in December.

Firm History

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

Firm Operations

This firm is registered with:

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

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

This firm conducts 1 type of business.

This firm is affiliated with financial or investment institutions.

This firm does not have referral or financial arrangements with other brokers or dealers.

Disclosure Events

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

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

The following types of disclosures have been reported:

Type	Count
Regulatory Event	3
Arbitration	2



Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Delaware on 12/31/1998.

Its fiscal year ends in December.

Firm Names and Locations

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

ICMA-RC SERVICES, LLC

Doing business as MISSIONSQUARE INVESTMENT SERVICES

CRD# 23189

SEC# 8-40268

Main Office Location

777 NORTH CAPITOL STREET, NE
SUITE 600
WASHINGTON, DC 20002-4240

Regulated by FINRA Philadelphia Office

Mailing Address

777 NORTH CAPITOL STREET, NE
SUITE 600
WASHINGTON, DC 20002-4240

Business Telephone Number

202-962-4600



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): INTERNATIONAL CITY MANAGEMENT ASSOCIATION RETIREMENT CORPORATION D/B/A MISSIONSQUARE RETIREMENT

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

Position MEMBER/OWNER

Position Start Date 12/1998

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): GANEY, PETER DAVIDSON
2282691

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

Position MANAGER

Position Start Date 02/2025

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): HOGENDORN, SHANNON DANIEL
3221945

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

Position CHIEF OPERATIONS OFFICER

Position Start Date 07/2025

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): HOGENDORN, SHANNON DANIEL
3221945

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

Position PRINCIPAL MANAGER

Position Start Date 09/2025

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): RICHARDS, CLIFF LAWRENCE
2974428

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

Position CHIEF COMPLIANCE OFFICER

Position Start Date 11/2014

Percentage of Ownership Less than 5%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): WHITTY, RICHARD PATRICK

Firm Profile



Direct Owners and Executive Officers (continued)

	1988149
Is this a domestic or foreign entity or an individual?	Individual
Position	TREASURER/FINOP
Position Start Date	02/2017
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

No information reported.



Firm History

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

No information reported.





Firm Operations

Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is currently registered with the SEC, 1 SRO and 51 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	10/14/1988

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

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

A government securities broker or dealer only: No

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

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	03/30/1989



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	05/08/1989
Alaska	Approved	09/18/1995
Arizona	Approved	07/27/1998
Arkansas	Approved	09/04/1998
California	Approved	03/09/1999
Colorado	Approved	08/30/1990
Connecticut	Limited	02/07/1991
Delaware	Approved	07/24/1995
District of Columbia	Approved	10/01/1988
Florida	Approved	08/28/1989
Georgia	Approved	06/22/1989
Hawaii	Approved	02/19/1999
Idaho	Approved	06/10/1998
Illinois	Approved	08/01/1989
Indiana	Approved	08/02/1994
Iowa	Approved	08/13/1991
Kansas	Approved	05/25/1989
Kentucky	Approved	05/19/1998
Louisiana	Approved	07/22/1994
Maine	Approved	05/17/1989
Maryland	Approved	08/16/1989
Massachusetts	Approved	07/14/1989
Michigan	Approved	05/22/1989
Minnesota	Approved	08/02/1989
Mississippi	Approved	07/20/1998
Missouri	Approved	09/17/1998
Montana	Limited	06/09/1998
Nebraska	Approved	02/25/1999
Nevada	Limited	07/28/1995
New Hampshire	Limited	07/21/1998
New Jersey	Approved	06/08/1989
New Mexico	Approved	06/20/1994
New York	Approved	05/31/1989

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	04/27/1989
North Dakota	Limited	10/26/1994
Ohio	Approved	02/09/1999
Oklahoma	Approved	06/18/1998
Oregon	Approved	06/13/1989
Pennsylvania	Approved	08/07/1989
Rhode Island	Approved	05/09/1989
South Carolina	Approved	06/11/1998
South Dakota	Approved	09/06/1990
Tennessee	Approved	05/05/1989
Texas	Limited	06/21/1989
Utah	Approved	08/15/1994
Vermont	Approved	08/23/1994
Virginia	Approved	07/30/1992
Washington	Limited	03/13/1996
West Virginia	Approved	06/09/1998
Wisconsin	Approved	09/29/1994
Wyoming	Approved	06/16/1998

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 1 type of business.

Types of Business

Other - WHOLESALE AND MARKETING OF COLLECTIVE INVESTMENT TRUSTS (CITS).

Other Types of Business

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

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

Non-Securities Business Description:

Firm Operations



Clearing Arrangements

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

Introducing Arrangements

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

Firm Operations

Industry Arrangements



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

Name:	GLOBAL RELAY
Business Address:	220 CAMBIE STREET 2ND FLOOR VANCOUVER, CANADA V6B 2M9
Effective Date:	09/12/2020
Description:	ELECTRONIC COMMUNICATIONS

Name:	SMARSH
Business Address:	851 SW 6TH AVENUE PORTLAND, OR 97204
Effective Date:	09/12/2012
Description:	STORAGE OF ELECTRONIC MESSAGES

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

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

Control Persons/Financing

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

This firm does not have individuals who wholly or partly finance the firm's business.



Firm Operations

Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

This firm is, directly or indirectly:

- in control of
 - controlled by
 - or under common control with
- the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.**

VANTAGEPOINT TRANSFER AGENTS, LLC is under common control with the firm.

Business Address:	777 NORTH CAPITOL ST, NE SUITE 600 WASHINGTON, DC 20002
Effective Date:	01/22/1999
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	VANTAGEPOINT TRANSFER AGENTS, LLC IS A WHOLLY-OWNED SUBSIDIARY OF MISSIONSQUARE RETIREMENT (INTERNATIONAL CITY MANAGEMENT ASSOCIATION RETIREMENT CORPORATION).

MISSIONSQUARE INVESTMENTS is under common control with the firm.

CRD #:	109138
Business Address:	777 NORTH CAPITOL ST., NE SUITE 600 WASHINGTON, DC 20002-4240
Effective Date:	12/31/1998
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	MISSIONSQUARE INVESTMENTS IS A WHOLLY-OWNED SUBSIDIARY OF

Firm Operations**Organization Affiliates (continued)**

MISSIONSQUARE RETIREMENT (INTERNATIONAL CITY MANAGEMENT ASSOCIATION RETIREMENT CORPORATION).

MISSIONSQUARE RETIREMENT controls the firm.

CRD #:	108783
Business Address:	777 NORTH CAPITOL ST., NE SUITE 600 WASHINGTON, DC 20002-4240
Effective Date:	12/31/1998
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	MISSIONSQUARE RETIREMENT (INTERNATIONAL CITY MANAGEMENT ASSOCIATION RETIREMENT CORPORATION) IS THE SOLE OWNER OF THE APPLICANT.

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
Regulatory Event	0	3	0
Arbitration	N/A	2	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:**
 - o A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - o Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
4. **There are different statuses and dispositions for disclosure events:**
 - o A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" event involves allegations that have not been proven or formally adjudicated.
 - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" event has been concluded and its resolution is not subject to change.
 - o A final event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
5. **You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.**

Regulatory - Final

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

Disclosure 1 of 3

Reporting Source: Firm

Current Status: Final



Allegations:	THE STATE SECURITIES DIVISION ALLEGES THE FIRM DID NOT COMPLY WITH PROVISIONS OF THE NEVADA SECURITIES LAW RELATING TO THE LICENSING OF BRANCH OFFICES WITH RESPECT TO TWO PRIVATE RESIDENCES.
Initiated By:	STATE OF NEVADA, SECURITIES DIVISION
Date Initiated:	11/03/2017
Docket/Case Number:	I15-052
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:	Order
Resolution Date:	03/29/2018
Sanctions Ordered:	Monetary/Fine \$50,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	OBTAIN A LICENSE AS A BRANCH OFFICE FOR ANY AND ALL PLACES OF BUSINESS IN THE STATE OF NEVADA FROM WHICH ON OR MORE SALES REPRESENTATIVES TRANSACT BUSINESS IN ACCORDANCE WITH NRS 90.360(2) AND NAC 90.392.
Sanction Details:	IN MARCH 2018, THE FIRM ENTERED INTO AN ADMINISTRATIVE CONSENT ORDER WITH THE NEVADA SECURITIES DIVISION IN WHICH THE FIRM AGREED TO PAY A FINE OF \$50,000.00.
Firm Statement	THE STATE OF NEVADA SECURITIES DIVISION ALLEGED TWO INSTANCES IN WHICH THE FIRM DID NOT REGISTER A PRIVATE RESIDENCE AS A BRANCH OFFICE, AS THAT TERM IS DEFINED UNDER NEVADA STATE LAW. IN MARCH 2018, THE FIRM AGREED TO A NEVADA ADMINISTRATIVE CONSENT ORDER TO PAY A FINE OF \$50,000.00 TO RESOLVE THESE ALLEGATIONS AND REGISTER PRIVATE RESIDENCES AS BRANCH OFFICES.

Disclosure 2 of 3

Reporting Source:	Regulator
Current Status:	Final
Allegations:	UNREGISTERED ACTIVITY.



Initiated By:	FLORIDA
Date Initiated:	08/12/2002
Docket/Case Number:	3506-S-07/02
URL for Regulatory Action:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Stipulation and Consent
Resolution Date:	08/15/2002
Sanctions Ordered:	Monetary/Fine \$5,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	NA
Sanction Details:	NA
Regulator Statement	BRANCH LOCATION OPERATED WITHOUT BENEFIT OF REGISTRATION.
Reporting Source:	Firm
Current Status:	Final
Allegations:	FAILURE TO REGISTER NASD REGISTERED BRANCH LOCATION WITH THE STATE.
Initiated By:	FLORIDA COMPTROLLER OFFICE,BANKING DEPT.,SECURITIES DIVISION
Date Initiated:	05/09/2002
Docket/Case Number:	NO. 3506-S-07/02
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	AMENDMENT TO SUPERVISORY PROCEDURES MANUAL AND \$5,000 FINE.



Resolution:	Consent
Resolution Date:	08/15/2002
Sanctions Ordered:	Monetary/Fine \$5,000.00
Other Sanctions Ordered:	AMENDMENT TO SUPERVISORY PROCEDURES MANUAL
Sanction Details:	FINE OF \$5,000 WAS PAID & RECIEVED BY STATE ON AUGUST 7, 2002 AND WAS PAID COMPLETELY BY APPLICANT.
Firm Statement	ICMA RC SERVICES, LLC ("RC SERVICES"), FAILED TO REGISTER A NASD REGISTERED BRANCH OFFICE WITH THE STATE. RC SERVICES AGREED TO A "STIPULATION AND CONSENT AGREEMENT," PAYMENT OF A FINE AND AMENDMENT OF ITS SUPERVISORY PROCEDURES MANUAL. ON AUGUST 15, 2002, FLORIDA APPROVED THE REGISTRATION OF RC SERVICE'S FLORIDA BRANCH OFFICE.

Disclosure 3 of 3

Reporting Source:	Firm
Current Status:	Final
Appealed To and Date Appeal Filed:	NO APPLICABLE.
Allegations:	THE STATE SECURITIES REGULATOR ALLEGED THAT THE FIRM FAILED TO COMPLY WITH PROVISIONS OF THE NEVADA STATE SECURITIES LAW RELATING TO LICENSING OF BRANCH OFFICES AND SALES REPRESENTATIVES.
Initiated By:	THE STATE OF NEVADA,SECURITIES DIVISION
Date Initiated:	09/05/2000
Docket/Case Number:	NOT APPLICABLE.
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:	ICMA RC SERVICES, LLC (THE FIRM) AGREED, PURSUANT TO A LETTER OF ACCEPTANCE, WAIVER, AND CONSENT ("AWC"), TO COMPLY WITH NEVADA STATE LAW REQUIREMENTS WITH RESPECT TO LICENSING OF BRANCH OFFICES AND SALES REPRESENTATIVES.



Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	10/23/2000
Sanctions Ordered:	Monetary/Fine \$16,000.00
Other Sanctions Ordered:	THE FIRM SIGNED THE AWC, WHICH INCLUDED PAYMENT OF \$16,000 TO THE STATE OF NEVADA SECURITIES DIVISION AND AGREEMENT TO COMPLY WITH ALL NEVADA STATE SECURITIES LAWS RELATING TO LICENSING OF BRANCH OFFICES AND SALES REPRESENTATIVES.
Sanction Details:	AS SOON AS THE FIRM BECAME AWARE OF THE STATE OF NEVADA'S LICENSING CONCERNS (SEVERAL MONTHS BEFORE THE STATE PRESENTED THE AWC TO THE FIRM) THE FIRM VOLUNTARILY TOOK SEVERAL IMMEDIATE ACTIONS, INCLUDING SUBMITTING APPROPRIATE LICENSING APPLICATIONS TO THE NEVADA SECURITIES DIVISION. THE FIRM FULLY COOPERATED WITH THE STATE REGULATORS IN CONNECTION WITH THIS MATTER AND PAID \$16,000 IN FULL ON OCTOBER 23, 2000. NO CURRENT EMPLOYEES OF THE FIRM WERE ALLEGED TO HAVE ACTED IMPROPERLY, NOR DID THE STATE ALLEGE THAT ANY CLIENTS WERE HARMED.
Firm Statement	ALL APPROPRIATE FIRM REPRESENTATIVES AND OFFICES HAVE BEEN PROPERLY LICENSED WITH THE STATE OF NEVADA AND THE FINE RESULTING FROM THIS MATTER HAS BEEN PAID IN FULL TO THE STATE. THE FIRM HAS ALSO VOLUNTARILY UNDERTAKEN A COMPREHENSIVE REVIEW OF ITS POLICIES AND PROCEDURES WITH RESPECT TO STATE REGISTRATION OF THE FIRM'S REPRESENTATIVES AND PLACES OF BUSINESS, AND IS IN THE PROCESS OF ENHANCING ITS WRITTEN SUPERVISORY PROCEDURES AND INTERNAL CONTROLS IN THIS AREA.



Arbitration Award - Award / Judgment

Brokerage firms are not required to report arbitration claims filed against them by customers; however, BrokerCheck provides summary information regarding FINRA arbitration awards involving securities and commodities disputes between public customers and registered securities firms in this section of the report.

The full text of arbitration awards issued by FINRA is available at www.finra.org/awardsonline.

Disclosure 1 of 2

Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-MANIPULATION; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-DIVIDENDS; OTHER-OTHER
Arbitration Forum:	FINRA
Case Initiated:	09/24/2009
Case Number:	09-04950
Disputed Product Type:	OTHER TYPES OF SECURITIES
Sum of All Relief Requested:	\$25,000.00
Disposition:	AWARD AGAINST PARTY
Disposition Date:	02/23/2010
Sum of All Relief Awarded:	\$6,926.50

There may be a non-monetary award associated with this arbitration.
Please select the Case Number above to view more detailed information.

Disclosure 2 of 2

Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT RELATED-OTHER; NO OTHER CONTROVERSY INVOLVED
Arbitration Forum:	NASD
Case Initiated:	06/01/1999
Case Number:	99-01800
Disputed Product Type:	COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE
Sum of All Relief Requested:	\$6,306.00



Disposition: AWARD AGAINST PARTY

Disposition Date: 01/25/2000

Sum of All Relief Awarded: \$5,325.00

There may be a non-monetary award associated with this arbitration.
Please select the Case Number above to view more detailed information.

End of Report



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