

BrokerCheck Report
BOFA SECURITIES, INC.
 CRD# 283942

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

About BrokerCheck®

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

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

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

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

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

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

- **How current is this information?**

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

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

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

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

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

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



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



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



BOFA SECURITIES, INC.

CRD# 283942

SEC# 8-69787

Main Office Location

ONE BRYANT PARK
NEW YORK, NY 10036
Regulated by FINRA New York Office

Mailing Address

150 N COLLEGE ST
NC1-028-29-04
CHARLOTTE, NC 28255

Business Telephone Number

646-743-2734

This firm is a brokerage firm and an investment adviser firm. For more information about investment adviser firms, visit the SEC's Investment Adviser Public Disclosure website at:

<https://www.adviserinfo.sec.gov>

Report Summary for this Firm

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

Firm Profile

This firm is classified as a corporation.

This firm was formed in Delaware on 09/01/2015.

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
- 26 Self-Regulatory Organizations
- 53 U.S. states and territories

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

This firm conducts 17 types of businesses.

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	69

The number of disclosures from non-registered control affiliates is 181



Firm Profile

This firm is classified as a corporation.

This firm was formed in Delaware on 09/01/2015.

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.

BOFA SECURITIES, INC.

Doing business as BOFA SECURITIES, INC.

CRD# 283942

SEC# 8-69787

Main Office Location

ONE BRYANT PARK
NEW YORK, NY 10036

Regulated by FINRA New York Office

Mailing Address

150 N COLLEGE ST
NC1-028-29-04
CHARLOTTE, NC 28255

Business Telephone Number

646-743-2734



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):	NB HOLDINGS CORPORATION
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	SOLE STOCKHOLDER
Position Start Date	05/2019
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):	BHATIA, KASHYAP P 6110368
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF COMPLIANCE OFFICER / BROKER DEALER
Position Start Date	08/2022
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	CHEPUCAVAGE, LAURA P 4672504
Is this a domestic or foreign entity or an individual?	Individual
Position	DIRECTOR, STATE DESIGNATED PRINCIPAL
Position Start Date	02/2022

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): GADKARI, SARANG RAJAN
2522409

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

Position DIRECTOR

Position Start Date 02/2022

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): MCQUEEN, MATTHEW C
4204052

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

Position DIRECTOR

Position Start Date 05/2024

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): MOONEY, SARA RATHBONE

Firm Profile



Direct Owners and Executive Officers (continued)

	7616382
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF FINANCIAL OFFICER
Position Start Date	09/2025
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	RAE, GLEN ALEXANDER 6300829
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF LEGAL OFFICER
Position Start Date	08/2019
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	SANTANNA, VINCENT C. 5290525
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF OPERATIONS OFFICER & FINOP
Position Start Date	03/2025
Percentage of Ownership	Less than 5%

Firm Profile



Direct Owners and Executive Officers (continued)

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

Is this a public reporting company? No

Legal Name & CRD# (if any): STAGG, JENNIFER C
2597167

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

Position CHIEF COMPLIANCE OFFICER / REGISTERED INVESTMENT ADVISER

Position Start Date 06/2025

Percentage of Ownership Less than 5%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): ZUBERI, SOOFIAN J J
2372292

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

Position DIRECTOR & CHIEF EXECUTIVE OFFICER, STATE DESIGNATED PRINCIPAL

Position Start Date 02/2022

Percentage of Ownership Less than 5%

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

Is this a public reporting company? No

Firm Profile

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



Indirect Owners

Legal Name & CRD# (if any):	BANK OF AMERICA CORPORATION
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	NB HOLDINGS CORPORATION
Relationship to Direct Owner	SOLE SHAREHOLDER
Relationship Established	10/1998
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	Yes

Firm History

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

No information reported.





Firm Operations

Registrations

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

This firm is currently registered with the SEC, 26 SROs and 53 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	01/23/2018

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: Yes

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	01/23/2018
BOX Exchange LLC	Approved	09/06/2018
Cboe BYX Exchange, Inc.	Approved	09/19/2018
Cboe BZX Exchange, Inc.	Approved	09/19/2018
Cboe C2 Exchange, Inc.	Approved	03/20/2019
Cboe EDGA Exchange, Inc.	Approved	09/19/2018
Cboe EDGX Exchange, Inc.	Approved	09/19/2018
Cboe Exchange, Inc.	Approved	02/26/2019
Investors' Exchange LLC	Approved	09/07/2018
Long-Term Stock Exchange, Inc.	Approved	04/21/2020
MEMX LLC	Approved	08/11/2020
MIAX Emerald, LLC	Approved	03/01/2019
MIAX PEARL, LLC	Approved	11/01/2018
MIAX Sapphire	Approved	08/12/2024
Miami International Securities Exchange, LLC	Approved	11/01/2018

NYSE American LLC	Approved	02/15/2018
NYSE Arca, Inc.	Approved	03/06/2018
NYSE National, Inc.	Approved	06/12/2018
NYSE Texas, Inc.	Approved	09/26/2018
Nasdaq BX, Inc.	Approved	10/01/2018
Nasdaq GEMX, LLC	Approved	10/01/2018
Nasdaq ISE, LLC	Approved	10/01/2018
Nasdaq MRX, LLC	Approved	10/01/2018
Nasdaq PHLX LLC	Approved	10/01/2018
Nasdaq Stock Market	Approved	10/01/2018
New York Stock Exchange	Approved	04/20/2018



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	04/26/2018
Alaska	Approved	03/06/2018
Arizona	Approved	03/07/2018
Arkansas	Approved	03/08/2018
California	Approved	03/07/2018
Colorado	Approved	04/03/2018
Connecticut	Approved	03/22/2018
Delaware	Approved	04/05/2018
District of Columbia	Approved	03/19/2018
Florida	Approved	09/06/2018
Georgia	Approved	03/06/2018
Hawaii	Approved	03/09/2018
Idaho	Approved	02/02/2018
Illinois	Approved	06/07/2018
Indiana	Approved	05/04/2018
Iowa	Approved	02/02/2018
Kansas	Approved	04/06/2018
Kentucky	Approved	03/14/2018
Louisiana	Approved	03/26/2018
Maine	Approved	04/11/2018
Maryland	Approved	03/01/2018
Massachusetts	Approved	04/10/2018
Michigan	Approved	02/02/2018
Minnesota	Approved	03/19/2018
Mississippi	Approved	03/07/2018
Missouri	Approved	04/04/2018
Montana	Approved	02/23/2018
Nebraska	Approved	03/23/2018
Nevada	Approved	03/08/2019
New Hampshire	Approved	03/15/2018
New Jersey	Approved	06/08/2018
New Mexico	Approved	03/12/2018
New York	Approved	03/06/2018

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	03/07/2018
North Dakota	Approved	04/20/2018
Ohio	Approved	03/02/2018
Oklahoma	Approved	03/19/2018
Oregon	Approved	04/25/2018
Pennsylvania	Approved	03/19/2018
Puerto Rico	Approved	03/28/2018
Rhode Island	Approved	03/08/2018
South Carolina	Approved	04/03/2018
South Dakota	Approved	03/07/2018
Tennessee	Approved	04/06/2018
Texas	Approved	04/30/2018
Utah	Approved	03/14/2018
Vermont	Approved	04/19/2018
Virgin Islands	Approved	05/08/2018
Virginia	Approved	03/08/2018
Washington	Approved	04/12/2018
West Virginia	Approved	03/23/2018
Wisconsin	Approved	04/09/2018
Wyoming	Approved	04/02/2018



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 17 types of businesses.

Types of Business

Exchange member engaged in exchange commission business other than floor activities

Exchange member engaged in floor activities

Broker or dealer making inter-dealer markets in corporation securities over-the-counter

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

Broker or dealer selling corporate debt securities

Underwriter or selling group participant (corporate securities other than mutual funds)

U S. government securities dealer

U S. government securities broker

Municipal securities dealer

Municipal securities broker

Solicitor of time deposits in a financial institution

Put and call broker or dealer or option writer

Broker or dealer selling securities of non-profit organizations (e.g., churches, hospitals)

Trading securities for own account

Private placements of securities

Broker or dealer selling interests in mortgages or other receivables

Other - WILL ENGAGED IN OTHER SECURITIES BUSINESS, INCLUDING, BUT NOT LIMITED TO, INVESTMENT BANKING, PUBLIC OFFERINGS OF SECURITIES, RESEARCH, SECURITIES LENDING, STOCK LOAN/STOCK BORROWED ACTIVITIES, EXEMPT SECURITIES, REPURCHASE AGREEMENTS, REVERSE REPURCHASE AGREEMENTS, PRIME BROKERAGE SERVICES, COMMERCIAL PAPER, OTHER SHORT TERM INSTRUMENTS, AND CLEARING SERVICES.

Other Types of Business

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

This firm does engage in other non-securities business.

Non-Securities Business Description: WILL ENGAGE IN NONSECURITIES BUSINESS, INCLUDING, BUT NOT LIMITED TO, MERGERS & ACQUISITIONS AND OTHER TRANSACTIONAL ADVISORY SERVICES, CORPORATE FINANCINGS, LOAN SYNDICATIONS AND LOAN TRADING, OVER THE COUNTER DERIVATIVE PRODUCTS,

COMMODITIES, FX AND CREDIT, VENTURE CAPITAL AND MARGIN
LENDING.

Firm Operations



Clearing Arrangements

This firm does 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:	SAP AMERICA INC.
Business Address:	601 108TH AVE NE, SUITE 1000 BELLEVUE, WA 98004
Effective Date:	05/13/2019
Description:	THE FIRM HAS ENTERED INTO AN ARRANGEMENT WITH SAP TO KEEP OR MAINTAIN CERTAIN EXPENSE RECORDS.
Name:	OPERATIONS & COMPLIANCE NETWORK, LLC
Business Address:	151 W. 42ND STREET 10TH FLOOR NEW YORK, NY 10036
Effective Date:	04/04/2022
Description:	THE FIRM HAS ENTERED INTO AN ARRANGEMENT WITH OPERATIONS & COMPLIANCE NETWORK, LLC ("OCN"), AN AFFILIATE OF NASDAQ, TO PREPARE OR MAINTAIN CERTAIN TRANSACTION RECORDS RELATING TO THE FIRM'S NMS STOCK ALTERNATIVE TRADING SYSTEM, INSTINCT X®, AS PART OF SUPPORT SERVICES THAT OCN PROVIDES THE FIRM TO HOST AND OPERATE INSTINCT X®.
Name:	PROOFPOINT, INC.
Business Address:	892 ROSS DRIVE SUNNYVALE, CA 94089
Effective Date:	08/01/2020
Description:	THE FIRM HAS ENTERED INTO AN ARRANGEMENT WITH PROOFPOINT, INC. TO KEEP OR MAINTAIN DOCUMENTATION RELATING TO ELECTRONIC COMMUNICATIONS RECORDS.
Name:	BANK OF AMERICA, NATIONAL ASSOCIATION
Business Address:	100 N. TRYON ST., SUITE 170 CHARLOTTE, NC 28255
Effective Date:	05/13/2019
Description:	BANK OF AMERICA, NATIONAL ASSOCIATION PROVIDES OPERATIONAL FACILITIES AND SUPPORT, DATA PROCESSING AND RECORD-KEEPING FUNCTIONS FOR APPLICANT.

Firm Operations



Industry Arrangements (continued)

Name:	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED
CRD #:	7691
Business Address:	ONE BRYANT PARK NEW YORK, NY 10036
Effective Date:	05/13/2019
Description:	MISCELLANEOUS RECORDS RELATING TO THE INSTITUTIONAL BUSINESS ACTIVITIES OF MLPF&S THAT WERE TRANSITIONED TO BOFA SECURITIES, INC. AS A RESULT OF THE BROKER-DEALER SEPARATION PROJECT IN MAY OF 2019.
Name:	REGED, INC.
Business Address:	2100 GATEWAY CENTER BLVD., SUITE 200 MORRISVILLE, NC 27560
Effective Date:	05/13/2019
Description:	THE FIRM HAS ENTERED INTO AN ARRANGEMENT WITH REGED TO KEEP OR MAINTAIN DOCUMENTATION RELATING TO THE REVIEW AND APPROVAL OF MARKETING AND ADVERTISING COMMUNICATIONS.
Name:	IRON MOUNTAIN INFORMATION MANAGEMENT, INC.
Business Address:	1 FEDERAL STREET BOSTON, MA 02110
Effective Date:	05/13/2019
Description:	THE FIRM HAS ENTERED INTO AN ARRANGEMENT WITH IRON MOUNTAIN TO KEEP OR MAINTAIN CERTAIN HARD COPY RECORDS.
Name:	FTEN
Business Address:	ONE LIBERTY PLAZA 165 BROADWAY, FL 51 NEW YORK, NY 10006
Effective Date:	05/13/2019
Description:	THE FIRM HAS ENTERED INTO AN ARRANGEMENT WITH FTEN TO KEEP OR MAINTAIN CERTAIN SECURITIES TRADING DATA.
Name:	IPREO
Business Address:	ONE PARK AVENUE NEW YORK, NY 10016
Effective Date:	05/13/2019

Firm Operations



Industry Arrangements (continued)

Description:	THE FIRM HAS ENTERED INTO AN ARRANGEMENT WITH IPREO TO KEEP OR MAINTAIN STABILIZATION-RELATED AND SYNDICATE TRANSACTION INFORMATION.
Name:	SMARSH INC.
Business Address:	851 SW 6TH AVE., SUITE 800 PORTLAND, OR 97204
Effective Date:	05/13/2019
Description:	THE FIRM HAS ENTERED INTO AN ARRANGEMENT WITH SMARSH INC. TO KEEP OR MAINTAIN DOCUMENTATION RELATING TO COMMUNICATIONS: ELECTRONIC CORRESPONDENCE BOTH SENT AND RECEIVED; AND ALTERNATIVE TRADING SYSTEM RECORDS: NOTICES PROVIDED TO ATS CUSTOMERS.
Name:	BROADRIDGE FINANCIAL SOLUTIONS, INC.
Business Address:	5 DAKOTA DRIVE, SUITE 300 LAKE SUCCESS, NY 11042
Effective Date:	05/13/2019
Description:	THE FIRM HAS ENTERED INTO AN ARRANGEMENT WITH BROADRIDGE FINANCIAL SOLUTIONS TO KEEP OR MAINTAIN DOCUMENTATION RELATING TO ACCOUNT RECORDS -- CONFIRMS OF PURCHASE AND SALE OF SECURITIES.

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.

BOFA SECURITIES PRIME, INC. is controlled by the firm.

CRD #:	316331
Business Address:	ONE BRYANT PARK NEW YORK, NY 10036
Effective Date:	12/10/2021
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	BOFAS PRIME IS CONTROLLED BY BOFA SECURITIES, INC., ESTABLISHED IN CONNECTION WITH PRIME BROKER-RELATED SERVICES

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

Business Address:	50 COLLYER QUAY #14-01 OUE BAYFRONT SINGAPORE, SINGAPORE 049321
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	SINGAPORE
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT

Firm Operations



Organization Affiliates (continued)

BOFA SECURITIES EUROPE SA is under common control with the firm.

Business Address:	112 AVENUE KLEBER PARIS, FRANCE 75116
Effective Date:	11/12/2018
Foreign Entity:	Yes
Country:	FRANCE
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	WHOLLY/MAJORITY OWNED INDIRECT SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

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

Business Address:	INDONESIA STOCK EXCHANGE BUILDING 18/F JL. JEND. SUDIRMAN KAV. 52-53 JAKARTA, INDONESIA 12190
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	INDONESIA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULIMATE PARENT OF APPLICANT.

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

Business Address:	7 PETROVKA STREET MOSCOW, RUSSIA 107031
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	RUSSIA
Securities Activities:	Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULIMATE PARENT OF APPLICANT.

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

Business Address:	2 KING EDWARD STREET LONDON, UNITED KINGDOM EC1A 1HQ
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	UNITED KINGDOM
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULIMATE PARENT OF APPLICANT.

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

CRD #:	7691
Business Address:	ONE BRYANT PARK NEW YORK, NY 10036
Effective Date:	09/01/2015
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULIMATE PARENT OF APPLICANT.

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

Business Address:	TUCUMAN 1, PISO 4 (1049) BUENOS AIRES, ARGENTINA
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Firm Operations



Organization Affiliates (continued)

Effective Date: 09/01/2015
Foreign Entity: Yes
Country: ARGENTINA
Securities Activities: Yes
Investment Advisory Activities: Yes
Description: SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULIMATE PARENT OF APPLICANT.

BANK OF AMERICA YATIRIM BANK AS is under common control with the firm.

Business Address: KANYON OFIS, KAT: 11 BUYUKDERE CAD
 185 34394 LEVENT
 ISTANBUL, TURKEY
Effective Date: 09/01/2015
Foreign Entity: Yes
Country: TURKEY
Securities Activities: Yes
Investment Advisory Activities: No
Description: SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULIMATE PARENT OF APPLICANT.

MERRILL LYNCH VALUATIONS LLC is under common control with the firm.

Business Address: ONE BRYANT PARK
 NEW YORK, NY 10036
Effective Date: 09/01/2015
Foreign Entity: No
Country:
Securities Activities: Yes
Investment Advisory Activities: No
Description: SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULIMATE PARENT OF APPLICANT.

Firm Operations



Organization Affiliates (continued)

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

Business Address:	138 WEST STREET, SANDOWN SANDTON, SOUTH AFRICA 2196
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	SOUTH AFRICA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULIMATE PARENT OF APPLICANT.

MERRILL LYNCH SECURITIES (THAILAND) LIMITED is under common control with the firm.

Business Address:	20TH FLOOR, UNIT 4, C.R.C. TOWER, ALL SEASONS PL 87/2 WIRELESS RD., LUMPINI SUBDISTRICT, PATUWAN BANGKOK, THAILAND 10330
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	THAILAND
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULIMATE PARENT OF APPLICANT.

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

Business Address:	9F & 17F(PART) 207 TUN HWA SOUTH ROAD, SECTION 2 TAIPEI, TAIWAN
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	TAIWAN
Securities Activities:	Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULIMATE PARENT OF APPLICANT.

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

Business Address: AV. BIGADEIRO FARIA LIMA
3400-16TH FLOOR, ITAIM BIBI
SAO PAULO, BRAZIL 04538-132

Effective Date: 09/01/2015

Foreign Entity: Yes

Country: BRAZIL

Securities Activities: Yes

Investment Advisory Activities: No

Description: SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULIMATE PARENT OF APPLICANT.

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

Business Address: PASEO DE LA REFORMA
115-19 COL. LOMAS DE CHAPUTEPEC
MEXICO CITY, MEXICO C.P. 11000

Effective Date: 09/01/2015

Foreign Entity: Yes

Country: MEXICO

Securities Activities: Yes

Investment Advisory Activities: No

Description: SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULIMATE PARENT OF APPLICANT.

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

Business Address: LEVEL 34, GOVERNOR PHILLIP TOWER
1 FARRER PLACE

Firm Operations



Organization Affiliates (continued)

	SYDNEY, AUSTRALIA NSW 2000
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT

MERRILL LYNCH, KINGDOM OF SAUDI ARABIA COMPANY is under common control with the firm.

Business Address:	KINGDOM TOWER, 20TH FLOOR RIYADH 11623, KINGDOM OF SAUDIA ARABIA
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	SAUDI ARABIA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT

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

Business Address:	NIHONBASHI 1-CHROME MITSUI BLDG. NIHONBASHI CHUO-KU TOKYO, JAPAN 203-8230
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	JAPAN
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF

Firm Operations



Organization Affiliates (continued)

APPLICANT

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

Business Address:	250 VESEY STREET NEW YORK, NY 10281
Effective Date:	09/01/2015
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT

BANK OF AMERICA EUROPE DAC is under common control with the firm.

Business Address:	TWO PARK PLACE HATCH STREET DUBLIN, IRELAND 2
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	IRELAND
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT

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

Business Address:	LEVEL 34, GOVERNOR PHILLIP TOWER 1 FARRER PLACE SYDNEY, AUSTRALIA NSW 2000
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	AUSTRALIA

Firm Operations



Organization Affiliates (continued)

Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT

MERRILL LYNCH INTERNATIONAL is under common control with the firm.

Business Address:	2 KING EDWARD STREET LONDON, UNITED KINGDOM EC1A 1HQ
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	UNITED KINGDOM
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT

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

Business Address:	55/F CHEUNG KONG CENTER 2 QUEEN'S ROAD CENTRAL HONG KONG, HONG KONG
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	HONG KONG
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT

MERRILL LYNCH EQUITY S.A.R.L. is under common control with the firm.

Business Address:	ATRIUM BUSINESS PARK 33 RUE DU PUIITS ROMAIN BERTRANGE, LUXEMBOURG L-8070
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Firm Operations



Organization Affiliates (continued)

Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	LUXEMBOURG
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT

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

Business Address:	LEVEL 34, GOVERNOR PHILLIP TOWER 1 FARRER PLACE SYDNEY, AUSTRALIA NSW 2000
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT

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

Business Address:	APOQUINDO 3500 PISO 9, LAS CONDES SANTIAGO, CHILE
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	CHILE
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF

Firm Operations



Organization Affiliates (continued)

APPLICANT

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

Business Address:	CALLE MARQUES DE VILLAMAGNA 3 TERRE SERRANO, PLANTA 8 MADRID, SPAIN 28001
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	SPAIN
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT

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

Business Address:	BROOKFIELD PLACE 181 BAY STREET, SUITE 400 TORONTO, ONTARIO, CANADA M5J2V8
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	CANADA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT

MERRILL LYNCH BANK AND TRUST COMPANY (CAYMAN) LIMITED is under common control with the firm.

Business Address:	HARBOUR CENTRE, 4TH FLOOR, NORTH CHURCH STREET GEORGE TOWN, P.O. BOX 1164 GT GEORGE TOWN, GRAND CAYMAN KY1-1102
Effective Date:	09/01/2015
Foreign Entity:	Yes

Firm Operations



Organization Affiliates (continued)

Country:	GRAND CAYMAN
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

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

Business Address:	DELLA PAOLERA 265 PISO 11 BUENOS AIRES, ARGENTINA
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	ARGENTINA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

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

Business Address:	50 COLLYER QUAY #14-01 OUE BAYFRONT SINGAPORE, SINGAPORE 049321
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	SINGAPORE
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

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

Firm Operations



Organization Affiliates (continued)

Business Address: LEVEL 34, GOVERNOR PHILLIP TOWER
1 FARRER PLACE
SYDNEY, AUSTRALIA NSW 2000

Effective Date: 09/01/2015

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: Yes

Investment Advisory Activities: No

Description: SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

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

Business Address: LEVEL 34, GOVERNOR PHILLIP TOWER
1 FARRER PLACE
SYDNEY, AUSTRALIA NSW 2000

Effective Date: 09/01/2015

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: Yes

Investment Advisory Activities: No

Description: SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

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

Business Address: 55/F CHEUNG KONG CENTER
2 QUEEN'S ROAD CENTRAL
HONG KONG, HONG KONG

Effective Date: 09/01/2015

Foreign Entity: Yes

Country: HONG KONG

Securities Activities: Yes

Investment Advisory Yes

Firm Operations



Organization Affiliates (continued)

Activities:

Description: SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

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

CRD #: 142558

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

Effective Date: 09/01/2015

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

BOFA SECURITIES INDIA LIMITED is under common control with the firm.

Business Address: ONE BKC, A WING, GROUND FLOOR
G BLOCK, BANDRA KURLA COMPLEX, BANDRA (EAST)
MUMBAI, INDIA 400 051

Effective Date: 09/01/2015

Foreign Entity: Yes

Country: INDIA

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

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

Business Address: 100 NORTH TRYON STREET
SUITE 170
CHARLOTTE, NC 28202

Firm Operations



Organization Affiliates (continued)

Effective Date: 09/01/2015

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

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

Business Address: 50 COLLYER QUAY
#14-01 OUE BAYFRONT
SINGAPORE, SINGAPORE 049321

Effective Date: 09/01/2015

Foreign Entity: Yes

Country: SINGAPORE

Securities Activities: Yes

Investment Advisory Activities: No

Description: SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

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

Business Address: PASEO DE LA REFORMA
115-19 COL. LOMAS DE CHAPUTEPEC
MEXICO CITY, MEXICO C.P. 11000

Effective Date: 09/01/2015

Foreign Entity: Yes

Country: MEXICO

Securities Activities: Yes

Investment Advisory Activities: No

Description: SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF

Firm Operations



Organization Affiliates (continued)

APPLICANT.

BANK OF AMERICA MERRILL LYNCH BANCO MULTIPLE S.A. is under common control with the firm.

Business Address:	AV. BIGADEIRO FARIA LIMA 3400-18TH FLOOR, ITAIM BIBI SAO PAULO, BRAZIL 04538-132
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	BRAZIL
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT.

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

Business Address:	52/F CHEUNG KONG CENTER 2 QUEEN'S ROAD CENTRAL HONG KONG, HONG KONG FOREIGN
Effective Date:	09/01/2015
Foreign Entity:	Yes
Country:	HONG KONG
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	SUBSIDIARY OF BANK OF AMERICA CORPORATION, ULTIMATE PARENT OF APPLICANT

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

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

Firm Operations



Organization Affiliates (continued)

- or foreign bank

BAC NORTH AMERICA HOLDING COMPANY is a Bank Holding Company and controls the firm.

Business Address: 100 NORTH TRYON STREET
CHARLOTTE, NC 28255

Effective Date: 09/01/2015

Description: BAC NORTH AMERICA HOLDING COMPANY IS A BANK HOLDING COMPANY AND IS AN INDIRECT PARENT OF THE APPLICANT

NB HOLDINGS CORPORATION is a Bank Holding Company and controls the firm.

Business Address: 100 NORTH TRYON STREET
CHARLOTTE, NY 28255

Effective Date: 09/01/2015

Description: NB HOLDINGS CORPORATION IS A BANK HOLDING COMPANY AND IS THE PARENT COMPANY OF BAC NORTH AMERICA HOLDING COMPANY, AN INDIRECT PARENT OF THE APPLICANT.

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

Business Address: 100 NORTH TRYON STREET
CHARLOTTE, NC 28255

Effective Date: 09/01/2015

Description: BANK OF AMERICA CORPORATION IS A MULTI-BANK HOLDING COMPANY REGISTERED UNDER THE BANK HOLDING COMPANY ACT OF 1956 WITH ITS PRINCIPAL ASSETS BEING THE STOCK OF THE SUBSIDIARIES. ONE OF ITS WHOLLY-OWNED SUBSIDIARIES IS NB HOLDING CORPORATION, AN INDIRECT PARENT OF THE APPLICANT.



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	69	0



Disclosure Event Details

What you should know about reported disclosure events:

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

Regulatory - Final

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

Disclosure 1 of 69

Reporting Source: Regulator

Current Status: Final

**Allegations:**

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO: (I) ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN POLICIES AND PROCEDURES REASONABLY DESIGNED TO PREVENT TRADE-THROUGHS OF PROTECTED QUOTATIONS IN NMS STOCKS IN CONNECTION WITH TWO SYSTEM ISSUES; (II) TAKE REASONABLE STEPS TO ESTABLISH THAT THE ISOS IT ROUTED OR ATTEMPTED TO ROUTE MET THE REQUIREMENTS SET FORTH IN RULE 600(B)(47); AND (III) CONDUCT REGULAR SURVEILLANCE TO ASCERTAIN THE EFFECTIVENESS OF ITS RULE 611 COMPLIANCE PROGRAM AND TO TAKE PROMPT ACTION TO REMEDY ANY DEFICIENCIES. THE FINDINGS STATED THAT ONE OF THE FIRM'S ELECTRONIC ORDER MANAGEMENT SYSTEMS INGESTED AND PROCESSED MARKET DATA FROM THE NATIONAL EXCHANGES FOR THE TOP EIGHT LEVELS OF QUOTATIONS FOR EACH NMS STOCK DISPLAYED BY EACH EXCHANGE, AS PART OF THE FIRM'S PROCESS OF TAKING MARKET SNAPSHOTS AND ROUTING ISOS TO PROTECTED QUOTATIONS. IF THERE WAS NO PROTECTED QUOTE AMONG THE TOP EIGHT QUOTATIONS (BECAUSE OF A PREVALENCE OF ODD LOTS IN THE DIRECT MARKET DATA FEEDS), THE FIRM'S ELECTRONIC ORDER MANAGEMENT SYSTEM DID NOT ROUTE AN ISO TO THAT EXCHANGE. AS A RESULT, DURING A SAMPLE PERIOD FROM JUNE 2022 THROUGH AUGUST 2022, THE FIRM EXECUTED APPROXIMATELY 42 POTENTIAL TRADE-THROUGHS WITHOUT ROUTING NECESSARY ISOS, INCLUDING SIX POTENTIAL TRADE-THROUGHS TO THE NYSE. THE FIRM DID NOT HAVE WRITTEN POLICIES AND PROCEDURES CONCERNING THE MARKET DATA THE FIRM WOULD REVIEW TO COMPLY WITH REGULATION NMS. FURTHER, THE FIRM DID NOT CONDUCT REGULAR SURVEILLANCE TO DETECT POTENTIAL TRADE-THROUGHS RESULTING FROM ITS LIMITED DATA INGESTION. ADDITIONALLY, FROM AT LEAST JANUARY 2021 THROUGH AUGUST 2022, THE FIRM DID NOT HAVE WRITTEN POLICIES AND PROCEDURES CONCERNING THE REVIEW OF ISO REJECTION MESSAGES FROM NATIONAL SECURITIES EXCHANGES AND THE POTENTIAL RESULTING TRADE-THROUGHS. DURING A SAMPLE PERIOD OF JANUARY 2021 THROUGH APRIL 2021, THE FIRM ROUTED 3,475 ISOS THAT WERE REJECTED BY EXCHANGES, INCLUDING THE NYSE, SOME OF WHICH WERE THE RESULT OF INCORRECT FIX TAG INFORMATION SENT BY CUSTOMERS. BASED ON THE ABOVE, THE FIRM VIOLATED EXCHANGE ACT RULES 611(A)(1), (A)(2) AND (C), AND NYSE RULE 7.31(E)(3). THE FINDINGS ALSO STATED THAT THE FIRM'S SUPERVISORY SYSTEM, INCLUDING ITS WSPS, WERE NOT REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH EXCHANGE ACT RULES 611(A)(1) AND (C), AND NYSE RULE 7.31(E)(3). SPECIFICALLY, FROM AT LEAST JANUARY 2015 THROUGH JULY 2023, THE FIRM'S SUPERVISORY SYSTEM AND WSPS WERE NOT REASONABLY DESIGNED TO DETECT AND REVIEW TRADE-THROUGHS THAT RESULTED FROM ONE OF THE FIRM'S ELECTRONIC ORDER MANAGEMENT SYSTEMS INGESTING AND PROCESSING MARKET



DATA FROM THE NATIONAL EXCHANGES, INCLUDING THE NYSE, FOR THE TOP EIGHT PRICE LEVELS OF QUOTATIONS FOR NMS STOCKS. ADDITIONALLY, FROM AT LEAST JANUARY 2021 THROUGH JULY 2023, THE FIRM'S SUPERVISORY SYSTEM AND WSPS WERE NOT REASONABLY DESIGNED TO REVIEW ISO REJECTION MESSAGES THAT NATIONAL EXCHANGES, INCLUDING THE NYSE, SENT AFTER THE FIRM ROUTED ISOS, AND FOR REVIEWING POTENTIAL RESULTING TRADE-THROUGHS THAT MAY HAVE OCCURRED AS A RESULT OF THOSE REJECTIONS. THUS, DURING THE RELEVANT PERIOD, THE FIRM' SUPERVISORY SYSTEM, INCLUDING ITS WSPS, WAS NOT REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH EXCHANGE ACT RULES 611(A)(1) AND (C) AND NYSE RULE 7.31(E)(3), IN VIOLATION OF NYSE RULES 3110(A) AND (B).

Initiated By: NEW YORK STOCK EXCHANGE

Date Initiated: 10/24/2025

Docket/Case Number: 2021071732706

Principal Product Type: Other

Other Product Type(s): UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/24/2025

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

Sanctions Ordered: Censure
Monetary/Fine \$55,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$450,000, OF WHICH \$55,000 IS PAYABLE TO NYSE. THE REMAINDER OF THE FINE IS TO BE PAID TO BZX, BYX, EDGX, EDGA, AND FINRA.

Reporting Source: Firm



Current Status:	Final
Allegations:	THE NEW YORK STOCK EXCHANGE LLC ("NYSE") ALLEGED THAT, FROM AT LEAST JANUARY 2015 THROUGH JULY 2023, BOFA SECURITIES, INC. ("BOFA SECURITIES") FAILED TO ESTABLISH, MAINTAIN AND ENFORCE WRITTEN POLICIES AND PROCEDURES REASONABLY DESIGNED TO PREVENT TRADE-THROUGHS OF PROTECTED QUOTATIONS IN NATIONAL MARKET SYSTEM STOCKS, IN VIOLATION OF RULE 611(A)(1) UNDER THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT"), DID NOT ESTABLISH THAT THE INTERMARKET SWEEP ORDERS IT ROUTED TO EXCHANGES MET THE REQUIREMENTS IN EXCHANGE ACT RULE 600(B)(47), IN VIOLATION OF NYSE RULE 7.31(E)(3) AND EXCHANGE ACT RULE 611(C), DID NOT REGULARLY CONDUCT SURVEILLANCE TO ASCERTAIN THE EFFECTIVENESS OF ITS RULE 611 COMPLIANCE PROGRAM AND TAKE PROMPT ACTION TO REMEDY ANY DEFICIENCIES, IN VIOLATION OF EXCHANGE ACT RULE 611(A)(2), AND FAILED TO ESTABLISH MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH EXCHANGE ACT RULE 611(A)(1) AND (C) AND NYSE RULE 7.31(E)(3), IN VIOLATION OF NYSE RULE 3110(A) AND (B).
Initiated By:	NEW YORK STOCK EXCHANGE LLC
Date Initiated:	10/27/2025
Docket/Case Number:	NO. 2021071732706
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	10/27/2025
Sanctions Ordered:	Censure Monetary/Fine \$55,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFA SECURITIES CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$55,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFA SECURITIES REACHED WITH THE FINANCIAL INDUSTRY REGULATORY



AUTHORITY, CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC. AND CBOE EDGX EXCHANGE, INC.

Firm Statement

WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFA SECURITIES CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$55,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFA SECURITIES REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC. AND CBOE EDGX EXCHANGE, INC.

Disclosure 2 of 69

Reporting Source:

Regulator

Current Status:

Final

Allegations:

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN POLICIES AND PROCEDURES REASONABLY DESIGNED TO PREVENT TRADE-THROUGHS OF PROTECTED QUOTATIONS IN NATIONAL MARKET SYSTEM (NMS) STOCKS RESULTING FROM SYSTEM ISSUES AND ASSURE THAT ITS INTERMARKET SWEEP ORDERS (ISOS) COMPLIED WITH REGULATION NMS OF THE EXCHANGE ACT. THE FINDINGS STATED THAT THE FIRM HAD SYSTEMIC LATENCY ISSUES THAT PREVENTED IT FROM EXECUTING SIMULTANEOUSLY OFF-EXCHANGE TRADE-THROUGHS THAT IT REPORTED TO FINRA WITH AN OUTBOUND ISO EXCEPTION MODIFIER. INSTEAD, THEY WERE EXECUTED, IN LIMITED CIRCUMSTANCES, ONE SECOND OR MORE AFTER ISOS WERE ROUTED. THE INTERMITTENT DELAYS WERE THE UNINTENDED CONSEQUENCE OF THE FIRM'S PROGRAMMING CHOICES FOR TWO COMPONENTS OF ITS ELECTRONIC ORDER MANAGEMENT SYSTEMS THAT THE FIRM HAD IMPLEMENTED. BECAUSE THESE DELAYS WERE UNINTENTIONAL AND NOT FOR THE PURPOSE OF ALLOWING CUSTOMERS TO OBTAIN THE BENEFIT OF BETTER ISO PRICING, THE OUTBOUND ISO EXCEPTION DID NOT APPLY TO THESE TRADE-THROUGHS. IN ADDITION, ONE OF THE FIRM'S ELECTRONIC ORDER MANAGEMENT SYSTEMS INGESTED AND PROCESSED MARKET DATA FROM THE NATIONAL EXCHANGES FOR THE TOP EIGHT LEVELS OF QUOTATIONS FOR EACH NMS STOCK DISPLAYED BY EACH EXCHANGE, AS PART OF THE FIRM'S PROCESS OF TAKING MARKET SNAPSHOTS AND ROUTING ISOS TO PROTECTED QUOTATIONS. IF THERE WAS NO PROTECTED QUOTE AMONG THE TOP EIGHT QUOTATIONS (BECAUSE OF A PREVALENCE OF ODD LOTS IN THE DIRECT MARKET DATA FEEDS), THE FIRM'S ELECTRONIC ORDER MANAGEMENT SYSTEM DID NOT ROUTE AN ISO TO THAT EXCHANGE. AS A RESULT, THE FIRM EXECUTED POTENTIAL



TRADE-THROUGHS WITHOUT ROUTING NECESSARY ISOS. FURTHER, A FIRM TRADING DESK MANUALLY EXECUTED ORDERS OUTSIDE OF THE NBBO PRICE FOR CUSTOMER FACILITATIONS AND MANUALLY EXECUTED CERTAIN POSITION TRANSFERS OUTSIDE THE NBBO DURING MARKET HOURS, RESULTING IN OFF-EXCHANGE TRADE-THROUGHS OF NMS STOCKS. THE FIRM THEN ALLOWED TRADE-THROUGHS AS A RESULT OF THIS MANUAL ORDER EXECUTION THAT DID NOT QUALIFY FOR A RULE 611(B) EXCEPTION. THE FIRM ALSO ROUTED ISOS WITH INCORRECT FIX TAG INFORMATION FROM THE CUSTOMER REGARDING AN ASSOCIATED CLEARING FIRM, WHICH RESULTED IN EXCHANGES REJECTING ISOS. THIS RESULTED IN THE FIRM EXECUTING TRADE-THROUGHS WITHOUT ROUTING NECESSARY ISOS. MOREOVER, THE FIRM DID NOT CONDUCT REGULAR SURVEILLANCE OF ITS RULE 611 COMPLIANCE PROGRAM TO DETECT THE ABOVE-REFERENCED ISSUES. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WSPS, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH EXCHANGE ACT RULE 611. THE FIRM'S SUPERVISION PROCESS DID NOT INCLUDE A SYSTEM, OR WRITTEN PROCEDURES DESIGNED TO DETECT AND REVIEW POTENTIAL TRADE-THROUGHS REPORTED WITH AN OUTBOUND ISO EXCEPTION MODIFIER WITHOUT SIMULTANEOUSLY-ROUTED ISOS. FURTHER, THE FIRM'S WSPS DID NOT INCLUDE SPECIFIC GUIDANCE FOR SUPERVISORS REGARDING HOW TO REVIEW THE VALIDITY OF EXCHANGE ACT RULE 611 EXCEPTION MODIFIERS APPLIED TO TRADE-THROUGHS. IN ADDITION, THE FIRM'S SUPERVISORY SYSTEM AND WSPS WERE NOT REASONABLY DESIGNED TO DETECT AND REVIEW TRADE-THROUGHS THAT RESULTED FROM THE FIRM'S ELECTRONIC ORDER MANAGEMENT SYSTEM ONLY INGESTING AND PROCESSING MARKET DATA FROM THE NATIONAL EXCHANGES FOR THE TOP EIGHT PRICE LEVELS OF QUOTATIONS FOR NMS STOCKS. THE FIRM'S SUPERVISORY SYSTEM AND WSPS WERE NOT REASONABLY DESIGNED TO DETECT AND REVIEW MANUALLY-EXECUTED TRADE-THROUGHS BY THE FIRM'S TRADING PERSONNEL ON ONE OF ITS TRADING DESKS. FURTHERMORE, THE FIRM'S SUPERVISORY SYSTEM AND WSPS WERE NOT REASONABLY DESIGNED TO DETECT AND REVIEW MANUALLY-EXECUTED TRADE-THROUGHS BY THE FIRM'S TRADING PERSONNEL ON ONE OF ITS TRADING DESKS.

Initiated By: FINRA
Date Initiated: 10/27/2025
Docket/Case Number: [2021071732701](#)
Principal Product Type: No Product
Other Product Type(s):



Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/27/2025

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

Sanctions Ordered: Censure
Monetary/Fine \$155,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$155,000 (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$450,000). THOSE MATTERS WERE BROUGHT BY CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., AND THE NEW YORK STOCK EXCHANGE, LLC.

Reporting Source: Firm

Current Status: Final

Allegations: THE FINANCIAL INDUSTRY REGULATORY AUTHORITY ("FINRA") ALLEGED THAT, FROM AT LEAST SEPTEMBER 2014 THROUGH AT LEAST JULY 2023, BOFA SECURITIES, INC. ("BOFA SECURITIES") FAILED TO ESTABLISH, MAINTAIN AND ENFORCE WRITTEN POLICIES AND PROCEDURES REASONABLY DESIGNED TO PREVENT TRADE-THROUGHS OF PROTECTED QUOTATIONS IN NATIONAL MARKET SYSTEM STOCKS AND DID NOT ENSURE THAT ITS INTERMARKET SWEEP ORDERS COMPLIED WITH REGULATION NMS UNDER THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT"), IN VIOLATION OF EXCHANGE ACT RULE 611(A)(1), (A)(2) AND (C) AND FINRA RULES 6380A(A)(5)(I) AND (J) AND 2010, AND FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH EXCHANGE ACT RULE 611, IN VIOLATION OF FINRA RULES 3110(A) AND (B) AND 2010 AND NASD RULE 3010.

Initiated By: FINANCIAL INDUSTRY REGULATORY AUTHORITY



Date Initiated:	10/27/2025
Docket/Case Number:	NO. 2021071732701
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	10/27/2025
Sanctions Ordered:	Censure Monetary/Fine \$155,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFA SECURITIES CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$155,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFA SECURITIES REACHED WITH CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC. AND THE NEW YORK STOCK EXCHANGE LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFA SECURITIES CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$155,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFA SECURITIES REACHED WITH CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC. AND THE NEW YORK STOCK EXCHANGE LLC.

Disclosure 3 of 69

Reporting Source:	Regulator
Current Status:	Final
Allegations:	BOFA SECURITIES, INC. VIOLATED SEA RULE 611(A)(1) AND (C) AND CBOE EDGA RULES 3.2 AND 11.8(C) IN THAT BOFAS ROUTED ISOS WITH INCORRECT FIX TAG INFORMATION FROM THE CUSTOMER REGARDING AN ASSOCIATED CLEARING FIRM, WHICH RESULTED IN EXCHANGES REJECTING 3,475 ISOS. BOFAS ALSO VIOLATED SEA RULE 611(A)(2) AND CBOE EDGA RULE 5.1 IN THAT THEY DID NOT CONDUCT REGULAR



SURVEILLANCE TO ASCERTAIN THE EFFECTIVENESS OF ITS RULE 611 COMPLIANCE PROGRAM, AND ITS WRITTEN POLICIES AND PROCEDURES WERE NOT REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RULE 611 AND CBOE EDGA RULES 3.2 AND 11.8(C).

Initiated By: CBOE EDGA EXCHANGE, INC.

Date Initiated: 10/14/2025

Docket/Case Number: FILE NO. URE-227-08

Principal Product Type: Equity Listed (Common & Preferred Stock)

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 10/15/2025

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

Sanctions Ordered: Censure
Monetary/Fine \$60,000.00

Other Sanctions Ordered:

Sanction Details: A CENSURE AND A MONETARY FINE IN THE AMOUNT OF \$60,000.

Reporting Source: Firm

Current Status: Final

Allegations: THE CBOE EDGA EXCHANGE, INC. ("EDGA") ALLEGED THAT, FROM AT LEAST JANUARY 2021 THROUGH AT LEAST APRIL 2021, BOFA SECURITIES, INC. ("BOFA SECURITIES") FAILED TO TAKE REASONABLE STEPS TO ESTABLISH THAT THE INTERMARKET SWEEP ORDERS ("ISO") IT ROUTED OR ATTEMPTED TO ROUTE MET THE REQUIREMENTS IN RULE 600(B)(47) UNDER THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND ROUTED ISOS WITH INCORRECT FIX TAG INFORMATION FROM THE CUSTOMER REGARDING AN ASSOCIATED CLEARING FIRM, IN VIOLATION



OF EXCHANGE ACT RULE 611(A)(1) AND (C) AND EDGA RULES 3.2 AND 11.8(C), AND VIOLATED EXCHANGE ACT RULE 611(A)(1) AND (A)(2) AND EDGA RULE 5.1 IN CONNECTION WITH NOT CONDUCTING REGULAR SURVEILLANCE TO ASCERTAIN THE EFFECTIVENESS OF ITS RULE 611 COMPLIANCE PROGRAM AND ITS WRITTEN POLICIES AND PROCEDURES NOT BEING REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RULE 611 AND EDGA RULES 3.2 AND 11.8(C).

Initiated By: CBOE EDGA EXCHANGE, INC.

Date Initiated: 10/15/2025

Docket/Case Number: URE-227-08

Principal Product Type: Equity Listed (Common & Preferred Stock)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 10/15/2025

Sanctions Ordered: Censure
Monetary/Fine \$60,000.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THAT VIOLATIONS WERE COMMITTED, BOFA SECURITIES CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$60,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFA SECURITIES REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, CBOE BZX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC. AND THE NEW YORK STOCK EXCHANGE LLC.

Firm Statement WITHOUT ADMITTING OR DENYING THAT VIOLATIONS WERE COMMITTED, BOFA SECURITIES CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$60,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFA SECURITIES REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, CBOE BZX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC. AND THE NEW YORK STOCK EXCHANGE LLC.



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Reporting Source:	Regulator
Current Status:	Final
Allegations:	BOFA SECURITIES, INC. VIOLATED EXCHANGE ACT RULE 611(A)(1) AND (C) AND CBOE EDGX RULES 3.2 AND 11.8(C) IN THAT THE FIRM ROUTED ISOS WITH INCORRECT FIX TAG INFORMATION FROM THE CUSTOMER REGARDING AN ASSOCIATED CLEARING FIRM, WHICH RESULTED IN EXCHANGES REJECTING 3,475 ISOS. THIS RESULTED IN BOFAS EXECUTING 23 TRADE-THROUGHS, INCLUDING FOUR TO CBOE EDGX, WITHOUT ROUTING NECESSARY ISOS. BOFAS ALSO VIOLATED SEA RULE 611 (A)(2) AND CBOE EDGX RULE 5.1, IN THAT BOFAS DID NOT CONDUCT REGULAR SURVEILLANCE TO ASCERTAIN THE EFFECTIVENESS OF ITS RULE 611 COMPLIANCE PROGRAM AND ITS WRITTEN POLICIES AND PROCEDURES WERE NOT REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RULE 611 AND CBOE EDGX RULES 3.2 AND 11.8(C).
Initiated By:	CBOE EDGX EXCHANGE, INC.
Date Initiated:	10/14/2025
Docket/Case Number:	FILE NO. URE-227-07/STAR NO. 20210717327-04
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	10/15/2025
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$60,000.00
Other Sanctions Ordered:	



Sanction Details: A CENSURE AND A MONETARY FINE IN THE AMOUNT OF \$60,000.

Reporting Source: Firm

Current Status: Final

Allegations: THE CBOE EDGX EXCHANGE, INC. ("EDGX") ALLEGED THAT, FROM AT LEAST JANUARY 2021 THROUGH AT LEAST APRIL 2021, BOFA SECURITIES, INC. ("BOFA SECURITIES") FAILED TO TAKE REASONABLE STEPS TO ESTABLISH THAT THE INTERMARKET SWEEP ORDERS ("ISO") IT ROUTED OR ATTEMPTED TO ROUTE MET THE REQUIREMENTS IN RULE 600(B)(47) UNDER THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND ROUTED ISOS WITH INCORRECT FIX TAG INFORMATION FROM THE CUSTOMER REGARDING AN ASSOCIATED CLEARING FIRM, IN VIOLATION OF EXCHANGE ACT RULE 611(A)(1) AND (C) AND EDGX RULES 3.2 AND 11.8(C), AND VIOLATED EXCHANGE ACT RULE 611(A)(1) AND (A)(2) AND EDGX RULE 5.1 IN CONNECTION WITH NOT CONDUCTING REGULAR SURVEILLANCE TO ASCERTAIN THE EFFECTIVENESS OF ITS RULE 611 COMPLIANCE PROGRAM AND ITS WRITTEN POLICIES AND PROCEDURES NOT BEING REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RULE 611 AND EDGA RULES 3.2 AND 11.8(C).

Initiated By: CBOE EDGX EXCHANGE, INC.

Date Initiated: 10/15/2025

Docket/Case Number: URE-227-07

Principal Product Type: Equity Listed (Common & Preferred Stock)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 10/15/2025

Sanctions Ordered: Censure
Monetary/Fine \$60,000.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THAT VIOLATIONS WERE COMMITTED, BOFA SECURITIES CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$60,000. THE FINE WILL BE PAID IN ACCORDANCE



WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFA SECURITIES REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, CBOE BZX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC. AND THE NEW YORK STOCK EXCHANGE LLC.

Firm Statement

WITHOUT ADMITTING OR DENYING THAT VIOLATIONS WERE COMMITTED, BOFA SECURITIES CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$60,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFA SECURITIES REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, CBOE BZX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC. AND THE NEW YORK STOCK EXCHANGE LLC.

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Reporting Source: Regulator

Current Status: Final

Appealed To and Date Appeal Filed: BOFA SECURITIES, INC. VIOLATED

Allegations: BOFA SECURITIES, INC. VIOLATED SEA RULE 611(A)(1) AND (C); CBOE BYX RULES 3.2 AND 11.9(D) IN THAT THE FIRM ROUTED ISOS WITH INCORRECT FIX TAG INFORMATION FROM THE CUSTOMER REGARDING AN ASSOCIATED CLEARING FIRM, WHICH RESULTED IN EXCHANGES REJECTING 3,475 ISOS. BOFA ALSO VIOLATED SEA RULE 611(A)(2) AND CBOE BYX RULE 5.1 IN THAT THE FIRM DID NOT CONDUCT REGULAR SURVEILLANCE TO ASCERTAIN THE EFFECTIVENESS OF ITS RULE 611 COMPLIANCE PROGRAM AND ITS WRITTEN POLICIES AND PROCEDURES WERE NOT REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RULE 611 AND CBOE BYX RULES 3.2 AND 11.9(D).

Initiated By: CBOE BYX EXCHANGE, INC.

Date Initiated: 10/14/2025

Docket/Case Number: FILE NO. URE-227-06/STAR NO.

Principal Product Type: Equity Listed (Common & Preferred Stock)

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:



Resolution:	Consent
Resolution Date:	10/15/2025
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$60,000.00
Other Sanctions Ordered:	
Sanction Details:	A CENSURE AND A MONETARY FINE IN THE AMOUNT OF \$60,000.
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Reporting Source:	Firm
Current Status:	Final
Allegations:	THE CBOE BYX EXCHANGE, INC. ("BYX") ALLEGED THAT, FROM AT LEAST JANUARY 2021 THROUGH AT LEAST APRIL 2021, BOFA SECURITIES, INC. ("BOFA SECURITIES") FAILED TO TAKE REASONABLE STEPS TO ESTABLISH THAT THE INTERMARKET SWEEP ORDERS ("ISO") IT ROUTED OR ATTEMPTED TO ROUTE MET THE REQUIREMENTS IN RULE 600(B)(47) UNDER THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND ROUTED ISOS WITH INCORRECT FIX TAG INFORMATION FROM THE CUSTOMER REGARDING AN ASSOCIATED CLEARING FIRM, IN VIOLATION OF EXCHANGE ACT RULE 611(A)(1) AND (C) AND BYX RULES 3.2 AND 11.9(D), AND VIOLATED EXCHANGE ACT RULE 611(A)(1) AND (A)(2) AND BYX RULE 5.1 IN CONNECTION WITH NOT CONDUCTING REGULAR SURVEILLANCE TO ASCERTAIN THE EFFECTIVENESS OF ITS RULE 611 COMPLIANCE PROGRAM AND ITS WRITTEN POLICIES AND PROCEDURES NOT BEING REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RULE 611 AND BYX RULES 3.2 AND 11.9(D).
Initiated By:	CBOE BYX EXCHANGE, INC.
Date Initiated:	10/15/2025
Docket/Case Number:	URE-227-06
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure


Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 10/15/2025

Sanctions Ordered: Censure
Monetary/Fine \$60,000.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THAT VIOLATIONS WERE COMMITTED, BOFA SECURITIES CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$60,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFA SECURITIES REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, CBOE BZX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC. AND THE NEW YORK STOCK EXCHANGE LLC.

Firm Statement WITHOUT ADMITTING OR DENYING THAT VIOLATIONS WERE COMMITTED, BOFA SECURITIES CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$60,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFA SECURITIES REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, CBOE BZX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC. AND THE NEW YORK STOCK EXCHANGE LLC.

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Reporting Source: Regulator

Current Status: Final

Allegations: BOFA SECURITIES, INC. VIOLATED CBOE BZX RULES 3.2 AND 11.9(D); EXCHANGE ACT RULE 611(A)(1) IN THAT THE FIRM ROUTED ISOS WITH INCORRECT FIX TAG INFORMATION FROM THE CUSTOMER REGARDING AN ASSOCIATED CLEARING FIRM, WHICH RESULTED IN EXCHANGES REJECTING 3,475 ISOS. BOFA ALSO VIOLATED CBOE BYX RULE 5.1 AND EXCHANGE ACT RULE 611(A)(2) IN THAT THE FIRM DID NOT CONDUCT REGULAR SURVEILLANCE TO ASCERTAIN THE EFFECTIVENESS OF ITS RULE 611 COMPLIANCE PROGRAM AND ITS WRITTEN POLICIES AND PROCEDURES WERE NOT REASONABLY DESIGNED TO ACHIEVE COMPLIANCE.

Initiated By: CBOE BZX EXCHANGE, INC.



Date Initiated: 10/14/2025

Docket/Case Number: FILE NO. URE-227-05/STAR NO. 20210717327-02

Principal Product Type: Equity Listed (Common & Preferred Stock)

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 10/15/2025

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

Sanctions Ordered: Censure
Monetary/Fine \$60,000.00

Other Sanctions Ordered:

Sanction Details: A CENSURE AND A MONETARY FINE IN THE AMOUNT OF \$60,000.

Reporting Source: Firm

Current Status: Final

Allegations: THE CBOE BZX EXCHANGE, INC. ("BZX") ALLEGED THAT, FROM AT LEAST JANUARY 2021 THROUGH AT LEAST APRIL 2021, BOFA SECURITIES, INC. ("BOFA SECURITIES") FAILED TO TAKE REASONABLE STEPS TO ESTABLISH THAT THE INTERMARKET SWEEP ORDERS ("ISO") IT ROUTED OR ATTEMPTED TO ROUTE MET THE REQUIREMENTS IN RULE 600(B)(47) UNDER THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND ROUTED ISOS WITH INCORRECT FIX TAG INFORMATION FROM THE CUSTOMER REGARDING AN ASSOCIATED CLEARING FIRM, IN VIOLATION OF EXCHANGE ACT RULE 611(A)(1) AND (C) AND BZX RULES 3.2 AND 11.9(D), AND VIOLATED EXCHANGE ACT RULE 611(A)(1) AND (A)(2) AND BZX RULE 5.1 IN CONNECTION WITH NOT CONDUCTING REGULAR SURVEILLANCE TO ASCERTAIN THE EFFECTIVENESS OF ITS RULE 611 COMPLIANCE PROGRAM AND ITS WRITTEN POLICIES AND PROCEDURES NOT BEING REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH



	RULE 611 AND BZX RULES 3.2 AND 11.9(D).
Initiated By:	CBOE BZX EXCHANGE, INC.
Date Initiated:	10/15/2025
Docket/Case Number:	URE-227-05
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	10/15/2025
Sanctions Ordered:	Censure Monetary/Fine \$60,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THAT VIOLATIONS WERE COMMITTED, BOFA SECURITIES CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$60,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFA SECURITIES REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, CBOE BYX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC. AND THE NEW YORK STOCK EXCHANGE LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THAT VIOLATIONS WERE COMMITTED, BOFA SECURITIES CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$60,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFA SECURITIES REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, CBOE BYX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC. AND THE NEW YORK STOCK EXCHANGE LLC.

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Reporting Source:	Firm
Current Status:	Final
Allegations:	THE CHICAGO BOARD OF TRADE ("CBOT") ALLEGED THAT, DURING APRIL



2025, BOFA SECURITIES, INC. ("THE FIRM") INACCURATELY REPORTED LONG POSITIONS ELIGIBLE FOR DELIVERY IN THE MAY 2025 SOYBEAN FUTURES CONTRACT, IN VIOLATION OF CBOT RULE 807.

Initiated By:	CHICAGO BOARD OF TRADE
Date Initiated:	07/11/2025
Docket/Case Number:	CBOT-DQA-25-1770
Principal Product Type:	Futures - Commodity
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	SUMMARY FINE
Resolution:	Other
Resolution Date:	07/11/2025
Sanctions Ordered:	Monetary/Fine \$1,500.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE ACTION IS BASED, THE FIRM WAS ORDERED TO PAY A \$1,500 FINE. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE DISCIPLINARY ACTION.
Firm Statement	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE ACTION IS BASED, THE FIRM WAS ORDERED TO PAY A \$1,500 FINE. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE DISCIPLINARY ACTION.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT VIOLATED NYSE ARCA RULES 6.78-O (TRANSACTIONS OFF THE EXCHANGE) AND 11.1(B) (ADHERENCE TO LAW AND GOOD BUSINESS PRACTICE) BY EFFECTING THE OFF EXCHANGE CREATION OF OPTIONS POSITIONS ON BEHALF OF ONE OF THE FIRM'S CUSTOMERS. THE FINDINGS STATED THAT THE CUSTOMER DID NOT HOLD THE OPTIONS POSITIONS THAT IT SOUGHT TO TRANSFER, AND HAD NOT PREVIOUSLY ACQUIRED THEM ON AN



EXCHANGE. INSTEAD, BOFAS FACILITATED THESE IN-KIND EXCHANGES BY CREATING THE OPTIONS POSITIONS OFF EXCHANGE THROUGH AN OCC POSITION ADJUSTMENT, IN CONTRAVENTION OF THE RULES PROHIBITING OFF-EXCHANGE TRANSACTIONS. THE CUSTOMER REQUESTED THAT THE FIRM ENGAGE IN APPROXIMATELY 800 SUCH IN-KIND TRANSFERS OF OPTIONS FOR ETF CREATION UNITS ON THE CUSTOMER'S BEHALF, RESULTING IN APPROXIMATELY 3,000 OFF-EXCHANGE TRANSFERS OF OPTIONS POSITIONS THAT WERE NOT PREVIOUSLY TRADED ON AN EXCHANGE. THE FINDINGS ALSO STATED THAT THE FIRM VIOLATED NYSE ARCA RULE 6.69-O(D) (REPORTING DUTIES) BY FAILING TO NOTIFY NYSE ARCA OF THE OFF-EXCHANGE CREATIONS. THE FINDINGS ALSO INCLUDED THAT THE FIRM VIOLATED NYSE ARCA RULE 11.18(B) AND (C) (SUPERVISION) BY FAILING TO HAVE A SUPERVISORY SYSTEM, INCLUDING WSPS, REASONABLY DESIGNED TO ENSURE COMPLIANCE WITH THE RESTRICTIONS ON OFF-EXCHANGE OPTIONS TRANSACTIONS. THE FIRM FAILED TO IMPLEMENT EITHER WSPS OR A SUPERVISORY REVIEW TO CONFIRM, EITHER ON A PRE- OR POST TRANSACTION BASIS, THAT THE CUSTOMER HELD THE OPTIONS POSITIONS IT WAS TRANSFERRING.

Initiated By: NYSE ARCA, INC.

Date Initiated: 04/28/2025

Docket/Case Number: 2023-11-07-00025

Principal Product Type: Options

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 04/28/2025

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

Sanctions Ordered: Censure
Monetary/Fine \$62,500.00

Other Sanctions Ordered:



Sanction Details: THE FIRM WAS CENSURED AND FINED \$250,000, OF WHICH \$62,500 IS PAYABLE TO NYSE ARCA. THE REMAINDER OF THE FINE SHALL BE PAID TO NYSE AMERICAN, LLC, CBOE EXCHANGE, INC., AND NASDAQ PHLX LLC.

Reporting Source: Firm

Current Status: Final

Allegations: NYSE ARCA, INC. (NYSE ARCA) ALLEGED THAT, FROM MAY 2020 TO DECEMBER 2021, BOFA SECURITIES, INC. (BOFAS) EFFECTED THE OFF-EXCHANGE CREATION OF OPTIONS POSITIONS ON BEHALF OF A BOFAS CUSTOMER, IN VIOLATION OF NYSE ARCA RULES 6.78-O AND 11.1(B), FAILED TO NOTIFY NYSE ARCA OF THE OFF-EXCHANGE CREATIONS, IN VIOLATION OF NYSE ARCA RULE 6.69-O(D), AND FAILED TO HAVE A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ENSURE COMPLIANCE WITH THE RESTRICTIONS ON OFF-EXCHANGE OPTIONS TRANSACTIONS, IN VIOLATION OF NYSE ARCA RULE 11.18(B) AND (C).

Initiated By: NYSE ARCA, INC.

Date Initiated: 04/29/2025

Docket/Case Number: 2023-11-07-00025

Principal Product Type: Options

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 04/29/2025

Sanctions Ordered: Censure
Monetary/Fine \$62,500.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$62,500. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFAS REACHED WITH CBOE EXCHANGE, INC., NASDAQ PHLX LLC, AND NYSE AMERICAN LLC.

**Firm Statement**

WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$62,500. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFAS REACHED WITH CBOE EXCHANGE, INC., NASDAQ PHLX LLC, AND NYSE AMERICAN LLC.

Disclosure 9 of 69**Reporting Source:**

Regulator

Current Status:

Final

Allegations:

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT VIOLATED NYSE AMERICAN RULE 16 (BUSINESS CONDUCT) BY EFFECTING THE OFF-EXCHANGE CREATION OF OPTIONS POSITIONS ON BEHALF OF ONE OF THE FIRM'S CUSTOMERS. THE FINDINGS STATED THAT THE FIRM THE CUSTOMER DID NOT HOLD THE OPTIONS POSITIONS THAT IT SOUGHT TO TRANSFER, AND HAD NOT PREVIOUSLY ACQUIRED THEM ON AN EXCHANGE. INSTEAD, BOFAS FACILITATED THESE IN-KIND EXCHANGES BY CREATING THE OPTIONS POSITIONS OFF EXCHANGE THROUGH AN OCC POSITION ADJUSTMENT, IN CONTRAVENTION OF THE RULES PROHIBITING OFF-EXCHANGE TRANSACTIONS. THE CUSTOMER REQUESTED THAT THE FIRM ENGAGE IN APPROXIMATELY 800 SUCH IN-KIND TRANSFERS OF OPTIONS FOR ETF CREATION UNITS ON THE CUSTOMER'S BEHALF, RESULTING IN APPROXIMATELY 3,000 OFF-EXCHANGE TRANSFERS OF OPTIONS POSITIONS THAT WERE NOT PREVIOUSLY TRADED ON AN EXCHANGE. THE FINDINGS ALSO STATED THAT THE FIRM VIOLATED NYSE AMERICAN RULE 957NY(D) (REPORTING DUTIES) BY FAILING TO NOTIFY NYSE AMERICAN OF THE OFF-EXCHANGE CREATIONS. THE FINDINGS ALSO INCLUDED THAT THE FIRM VIOLATED NYSE AMERICAN RULE 320(E) (OFFICES-APPROVAL, SUPERVISION AND CONTROL) BY FAILING TO HAVE A SUPERVISORY SYSTEM, INCLUDING WSPS, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE RESTRICTIONS ON OFF-EXCHANGE OPTIONS TRANSACTIONS. THE FIRM FAILED TO IMPLEMENT EITHER WSPS OR A SUPERVISORY REVIEW TO CONFIRM, EITHER ON A PRE- OR POST TRANSACTION BASIS, THAT THE CUSTOMER HELD THE OPTIONS POSITIONS IT WAS TRANSFERRING.

Initiated By:

NYSE AMERICAN LLC

Date Initiated:

04/28/2025

Docket/Case Number:

2023-11-07-00025

Principal Product Type:

Options

Other Product Type(s):



Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 04/28/2025

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

Sanctions Ordered: Censure
Monetary/Fine \$62,500.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$250,000, OF WHICH \$62,500 IS PAYABLE TO NYSE AMERICAN. THE REMAINING FINE SHALL BE PAID TO NYSE ARCA, INC., CBOE EXCHANGED INC., AND NASDAQ PHLX LLC.

Reporting Source: Firm

Current Status: Final

Allegations: NYSE AMERICAN LLC (NYSE AMERICAN) ALLEGED THAT, FROM MAY 2020 TO DECEMBER 2021, BOFA SECURITIES, INC. (BOFAS) EFFECTED THE OFF-EXCHANGE CREATION OF OPTIONS POSITIONS ON BEHALF OF A BOFAS CUSTOMER, IN VIOLATION OF NYSE AMERICAN RULE 16, FAILED TO NOTIFY NYSE AMERICAN OF THE OFF-EXCHANGE CREATIONS, IN VIOLATION OF NYSE AMERICAN RULE 957NY(D), AND FAILED TO HAVE A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE RESTRICTIONS ON OFF-EXCHANGE OPTIONS TRANSACTIONS, IN VIOLATION OF NYSE AMERICAN RULE 320(E).

Initiated By: NYSE AMERICAN LLC

Date Initiated: 04/29/2025

Docket/Case Number: 2023-11-07-00025

Principal Product Type: Options

Other Product Type(s):



Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	04/29/2025
Sanctions Ordered:	Censure Monetary/Fine \$62,500.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$62,500. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFAS REACHED WITH NYSE ARCA, INC., CBOE EXCHANGE, INC., AND NASDAQ PHLX LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$62,500. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFAS REACHED WITH NYSE ARCA, INC., CBOE EXCHANGE, INC., AND NASDAQ PHLX LLC.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	PHLX ENFORCEMENT (THE "STAFF") REVIEWED BANK OF AMERICA'S PARTICIPATION IN THE OFF-EXCHANGE CREATION AND TRANSFER OF FLEX OPTIONS ("FLEX OPTIONS") POSITIONS FOR CREATION UNITS OF EXCHANGE TRADED FUNDS ("ETFs") BETWEEN MAY 2020 AND DECEMBER 2021 (THE "REVIEW PERIOD"). AS A RESULT OF ITS REVIEW, THE STAFF DETERMINED THAT THROUGHOUT THE REVIEW PERIOD, BANK OF AMERICA REQUESTED THAT ITS CLEARING FIRM, WHICH WAS ALSO AN AUTHORIZED PARTICIPANT ("AP") FOR OPTIONS ETFs, ENGAGE IN THE IN-KIND TRANSFER OF FLEX OPTIONS POSITIONS FOR ETF CREATION UNITS. TO FACILITATE THESE TRANSFERS, THE CLEARING FIRM USED AN OPTIONS CLEARING CORPORATION ("OCC") ADJUSTMENT PROCESS TO CREATE THE FLEX OPTIONS POSITIONS. THEN, THE CLEARING FIRM EXCHANGED THE FLEX OPTIONS POSITIONS AS AP FOR ETF CREATION UNITS ON BEHALF OF BANK OF AMERICA. BANK OF AMERICA DID NOT PROVIDE PHLX WITH WRITTEN NOTICE PRIOR TO THE OFF-EXCHANGE TRANSACTIONS. BECAUSE THE FLEX OPTIONS DID NOT TRADE



ON ANY EXCHANGE BEFORE THE CLEARING FIRM TRANSFERRED THEM IN-KIND FOR ETF CREATION UNITS, BANK OF AMERICA VIOLATED PHLX RULE OPTIONS6, SECTION 7. BANK OF AMERICA'S FAILURE TO PROVIDE PHLX WITH WRITTEN NOTICE OF THE POSITION TRANSFERS ALSO VIOLATED PHLX RULE OPTIONS 6, SECTION 5(D). FINALLY, BANK OF AMERICA FAILED TO ESTABLISH AND MAINTAIN A SYSTEM TO PREVENT AND DETECT, INsofar AS PRACTICABLE, VIOLATIONS OF PHLX RULES IN CONNECTION WITH THE IN-KIND TRANSFERS, VIOLATING PHLX RULE OPTIONS 9, SECTION 1 (FOR CONDUCT PRIOR TO JANUARY 22, 2021), PHLX RULE GENERAL 9, SECTION 1(C) (FOR CONDUCT ON AND AFTER JANUARY 22, 2021) AND PHLX RULE GENERAL 9, SECTION 20(H).

Initiated By: NASDAQ PHLX LLC

Date Initiated: 04/25/2025

Docket/Case Number: 2025.03.0458

Principal Product Type: Options

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 04/25/2025

Sanctions Ordered: Censure
Monetary/Fine \$62,500.00

Other Sanctions Ordered:

Sanction Details: FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A \$250,000 FINE, OF WHICH \$62,500 SHALL BE PAID TO PHLX.

Reporting Source: Firm

Current Status: Final

Allegations: NASDAQ PHLX LLC (PHLX) ALLEGED THAT FROM, MAY 2020 TO DECEMBER 2021, BOFA SECURITIES, INC. (BOFAS) EFFECTED THE OFF-EXCHANGE CREATION OF OPTIONS POSITIONS ON BEHALF OF A BOFAS CUSTOMER, IN VIOLATION OF PHLX RULE OPTIONS 6, SECTIONS 3 AND 7, FAILED TO PROVIDE NOTICE OF THE OFF-EXCHANGE TRANSACTIONS TO PHLX, IN VIOLATION OF PHLX RULE OPTIONS 6, SECTION 5(D), AND FAILED TO



ESTABLISH AND MAINTAIN A SYSTEM TO PREVENT AND DETECT, INsofar AS PRACTICABLE, VIOLATIONS OF PHLX AND OPTIONS CLEARING CORPORATION RULES IN CONNECTION WITH THE OFF-EXCHANGE TRANSACTIONS, IN VIOLATION OF PHLX RULE GENERAL 9, SECTION 1 (FOR CONDUCT PRIOR TO JANUARY 22, 2021), SECTION 1(C) (FOR CONDUCT ON AND AFTER JANUARY 22, 2021) AND SECTION 20(H).

Initiated By: NASDAQ PHLX LLC

Date Initiated: 04/25/2025

Docket/Case Number: 2025.03.0458

Principal Product Type: Options

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 04/25/2025

Sanctions Ordered: Censure
Monetary/Fine \$62,500.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$62,500. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFAS REACHED WITH CBOE EXCHANGE, INC., NYSE ARCA, INC., AND NYSE AMERICAN LLC.

Firm Statement WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$62,500. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFAS REACHED WITH CBOE EXCHANGE, INC., NYSE ARCA, INC., AND NYSE AMERICAN LLC.

Disclosure 11 of 69

Reporting Source: Regulator

Current Status: Final

Allegations: BOFA SECURITIES, INC. VIOLATED CBOE RULES 5.12, 6.9, AND 8.2 AND OCC BY-LAWS ARTICLE VI, SECTION 1, IN THAT THE FIRM IMPROPERLY



CREATED OPTIONS POSITIONS THROUGH OCC ADJUSTMENTS THAT IT THEN TRANSFERRED TO ITS CUSTOMER'S ACCOUNT. FURTHER, DURING THE REVIEW PERIOD, THE FIRM FAILED TO ESTABLISH, MAINTAIN AND ENFORCE WSPS, AND A SYSTEM FOR APPLYING SUCH PROCEDURES, REASONABLY DESIGNED TO PREVENT AND DETECT VIOLATIONS OF OCC BY-LAWS, ARTICLE VI, SECTION 1 WITH REGARDS TO THE USE OF THE OCC ADJUSTMENT PROCESS. SPECIFICALLY, BOFA SECURITIES HAD NO PROCEDURES OR SYSTEM FOR APPLYING SUCH PROCEDURES TO REVIEW THAT ITS CUSTOMERS HAD THE NECESSARY OPTIONS POSITIONS IN THEIR CLEARING ACCOUNTS AT THE TIME IN-KIND TRANSFERS WERE MADE FOR THE PURCHASE OF ETF CREATION UNITS. FURTHER, BOFA SECURITIES HAD NO PROCEDURES OR SYSTEM FOR APPLYING SUCH PROCEDURES DESIGNED TO DETERMINE WHETHER IT HAD EFFECTED THOSE TRANSFERS IN A MANNER CONSISTENT WITH THE OCC ADJUSTMENT PROCESS PURSUANT TO THE LIMITED CIRCUMSTANCES PROVIDED IN OCC BY-LAWS ARTICLE VI, SECTION 1. THESE ACTS DESCRIBED CONSTITUTE VIOLATIONS OF CBOE RULE 8.16 IN THAT THE FIRM DID NOT ESTABLISH, MAINTAIN AND ENFORCE WSPS REASONABLY DESIGNED TO ENABLE IT TO COMPLY WITH THE RULES SET FORTH IN THE LETTER OF CONSENT.

Initiated By:	CBOE EXCHANGE, INC.
Date Initiated:	04/16/2025
Docket/Case Number:	FILE NO. URE-349-01
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	04/25/2025
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$62,500.00

**Other Sanctions Ordered:**

Sanction Details: A CENSURE AND A TOTAL MONETARY FINE IN THE AMOUNT OF \$250,000, OF WHICH \$62,500 IS ALLOCATED TO CBOE.

Reporting Source: Firm

Current Status: Final

Allegations: CBOE EXCHANGE, INC. (CBOE) ALLEGED THAT, FROM MAY 2020 TO DECEMBER 2021, BOFA SECURITIES, INC. (BOFAS) EFFECTED THE OFF-FLOOR CREATION OF OPTIONS POSITIONS ON BEHALF OF A BOFAS CUSTOMER, IN VIOLATION OF CBOE RULES 5.12, 6.9, AND 8.2 AND OPTIONS CLEARING CORPORATION (OCC) BY-LAWS ARTICLE VI, SECTION 1, AND FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN SUPERVISORY PROCEDURES, AND A SYSTEM FOR APPLYING SUCH PROCEDURES, REASONABLY DESIGNED TO PREVENT AND DETECT VIOLATIONS OF CBOE RULES 5.12 AND 6.9 AND OCC BY-LAWS ARTICLE VI, SECTION 1, IN VIOLATION OF CBOE RULE 8.16.

Initiated By: CBOE EXCHANGE, INC.

Date Initiated: 04/25/2025

Docket/Case Number: URE-349-01

Principal Product Type: Options

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 04/25/2025

Sanctions Ordered: Censure
Monetary/Fine \$62,500.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF CBOE RULES WERE COMMITTED, BOFAS CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$62,500. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFAS



REACHED WITH NYSE ARCA, INC., NYSE AMERICAN LLC, AND NASDAQ PHLX LLC.

Firm Statement

WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF CBOE RULES WERE COMMITTED, BOFAS CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$62,500. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFAS REACHED WITH NYSE ARCA, INC., NYSE AMERICAN LLC, AND NASDAQ PHLX LLC.

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Reporting Source: Regulator

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO TIMELY REPORT TRANSACTIONS IN TRACE-ELIGIBLE SECURITIES. THE FINDINGS STATED THAT THE FIRM FAILED TO TIMELY REPORT AGENCY DEBT TRANSACTIONS, TRANSACTIONS IN SECURITIZED PRODUCTS, AND CORPORATE DEBT TRANSACTIONS. THE FINDINGS ALSO STATED THAT THE FIRM INACCURATELY REPORTED TRANSACTIONS IN TRACE-ELIGIBLE SECURITIES WITHOUT THE REQUIRED .B MODIFIER. THE FINDINGS ALSO INCLUDED THAT THE FIRM FAILED TO ESTABLISH AND MAINTAIN A SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE FIRM'S OBLIGATION TO REPORT TRANSACTIONS TIMELY AND ACCURATELY TO TRACE. IN PARTICULAR, THE FIRM'S SYSTEM FOR REVIEWING LATE TRACE REPORTS WAS NOT REASONABLY DESIGNED TO TAKE APPROPRIATE CORRECTIVE ACTION TO PREVENT ADDITIONAL UNTIMELY REPORTS, OR TO IDENTIFY OR ADDRESS INACCURACIES OR MISSING MODIFIERS IN TRACE REPORTS. THE FIRM TOOK A NUMBER OF REMEDIAL MEASURES TO ADDRESS ITS TRACE REPORTING DEFICIENCIES, INCLUDING MIGRATING TO A NEW INTERNAL REPORTING SYSTEM, AND IMPLEMENTING NEW EXCEPTION REPORTS AND MANAGEMENT MEETINGS TO REVIEW THE FIRM'S COMPLIANCE WITH ITS TRACE REPORTING OBLIGATIONS.

Initiated By: FINRA

Date Initiated: 01/02/2025

Docket/Case Number: [2022074855301](#)

Principal Product Type: No Product

Other Product Type(s):



Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 01/02/2025

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

Sanctions Ordered: Censure
Monetary/Fine \$250,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$250,000. FINE PAID IN FULL ON JANUARY 22, 2025.

Reporting Source: Firm

Current Status: Final

Allegations: THE FINANCIAL INDUSTRY REGULATORY AUTHORITY (FINRA) ALLEGED THAT BOFA SECURITIES, INC. (BOFAS) FAILED TO TIMELY REPORT TO THE TRADE REPORTING AND COMPLIANCE ENGINE (TRACE) CERTAIN TRANSACTIONS IN TRACE-ELIGIBLE SECURITIES FROM OCTOBER 2021 THROUGH JUNE 2023, IN VIOLATION OF FINRA RULES 6730(A) AND 2010, REPORTED TO TRACE CERTAIN TRANSACTIONS IN TRACE-ELIGIBLE SECURITIES WITHOUT A REQUIRED MODIFIER FROM FEBRUARY 2018 THROUGH JUNE 2022, IN VIOLATION OF FINRA RULES 6730(A) AND (B) AND 2010, AND FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH ITS TRACE-REPORTING OBLIGATIONS FROM FEBRUARY 2018 THROUGH JUNE 2023, IN VIOLATION OF FINRA RULES 3110(A) AND 2010.

Initiated By: FINANCIAL INDUSTRY REGULATORY AUTHORITY

Date Initiated: 01/02/2025

Docket/Case Number: [2022074855301](#)

Principal Product Type: No Product



Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	01/02/2025
Sanctions Ordered:	Censure Monetary/Fine \$250,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS AGREED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$250,000. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS AGREED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$250,000. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC.

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Reporting Source:	Firm
Current Status:	Final
Allegations:	CBOE EDGX EXCHANGE, INC. (EDGX) ALLEGED THAT BOFA SECURITIES, INC. (BOFAS), FROM SEPTEMBER 2018 TO PRESENT, AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED (MLPFS), FROM DECEMBER 2015 TO JUNE 2019, FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING, IN VIOLATION OF EDGX RULE 5.1.
Initiated By:	CBOE EDGX EXCHANGE, INC.
Date Initiated:	09/03/2024
Docket/Case Number:	NO. 20170550870-07
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure


Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 09/03/2024

Sanctions Ordered: Censure
Monetary/Fine \$333,000.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF EXCHANGE RULES WERE COMMITTED, BOFAS AND MLPFS CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$333,000. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFAS AND MLPFS REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, THE NASDAQ STOCK MARKET LLC, NYSE ARCA, INC., CBOE EDGA EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., AND INVESTORS EXCHANGE LLC.

Firm Statement WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF EXCHANGE RULES WERE COMMITTED, BOFAS AND MLPFS CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$333,000. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFAS AND MLPFS REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, THE NASDAQ STOCK MARKET LLC, NYSE ARCA, INC., CBOE EDGA EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., AND INVESTORS EXCHANGE LLC.

Disclosure 14 of 69

Reporting Source: Firm

Current Status: Final

Allegations: CBOE BYX EXCHANGE, INC. (BYX) ALLEGED THAT BOFA SECURITIES, INC. (BOFAS), FROM SEPTEMBER 2018 TO PRESENT, AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED (MLPFS), FROM DECEMBER 2015 TO PRESENT, FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING, IN VIOLATION OF BYX RULE 5.1.

Initiated By: CBOE BYX EXCHANGE, INC.

Date Initiated: 09/03/2024



Docket/Case Number:	NO. 20170550870-04
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	09/03/2024
Sanctions Ordered:	Censure Monetary/Fine \$333,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF EXCHANGE RULES WERE COMMITTED, BOFAS AND MLPFS CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$333,000. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFAS AND MLPFS REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, THE NASDAQ STOCK MARKET LLC, NYSE ARCA, INC., CBOE EDGA EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., AND INVESTORS EXCHANGE LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF EXCHANGE RULES WERE COMMITTED, BOFAS AND MLPFS CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$333,000. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFAS AND MLPFS REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, THE NASDAQ STOCK MARKET LLC, NYSE ARCA, INC., CBOE EDGA EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., AND INVESTORS EXCHANGE LLC.

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Reporting Source:	Firm
Current Status:	Final
Allegations:	CBOE BZX EXCHANGE, INC. (BZX) ALLEGED THAT BOFA SECURITIES, INC. (BOFAS), FROM SEPTEMBER 2018 TO PRESENT, AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED (MLPFS), FROM DECEMBER



2015 TO PRESENT, FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING, IN VIOLATION OF BZX RULE 5.1.

Initiated By:	CBOE BZX EXCHANGE, INC.
Date Initiated:	09/03/2024
Docket/Case Number:	NO. 2017055087005
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	09/03/2024
Sanctions Ordered:	Censure Monetary/Fine \$333,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF EXCHANGE RULES WERE COMMITTED, BOFAS AND MLPFS CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$333,000. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFAS AND MLPFS REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, THE NASDAQ STOCK MARKET LLC, NYSE ARCA, INC., CBOE EDGA EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., AND INVESTORS EXCHANGE LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF EXCHANGE RULES WERE COMMITTED, BOFAS AND MLPFS CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$333,000. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFAS AND MLPFS REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, THE NASDAQ STOCK MARKET LLC, NYSE ARCA, INC., CBOE EDGA EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., AND INVESTORS EXCHANGE LLC.



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Reporting Source:	Firm
Current Status:	Final
Allegations:	CBOE EDGA EXCHANGE, INC. (EDGA) ALLEGED THAT BOFA SECURITIES, INC. (BOFAS), FROM SEPTEMBER 2018 TO PRESENT, AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED (MLPFS), FROM DECEMBER 2015 TO JUNE 2019, FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING, IN VIOLATION OF EDGA RULE 5.1.
Initiated By:	CBOE EDGA EXCHANGE, INC.
Date Initiated:	09/03/2024
Docket/Case Number:	NO. 20170550870-06
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	09/03/2024
Sanctions Ordered:	Censure Monetary/Fine \$333,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF EXCHANGE RULES WERE COMMITTED, BOFAS AND MLPFS CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$333,000. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFAS AND MLPFS REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, THE NASDAQ STOCK MARKET LLC, NYSE ARCA, INC., CBOE EDGX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., AND INVESTORS EXCHANGE LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF EXCHANGE RULES WERE COMMITTED, BOFAS AND MLPFS CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$333,000. THE



FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT BOFAS AND MLPFS REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, THE NASDAQ STOCK MARKET LLC, NYSE ARCA, INC., CBOE EDGX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., AND INVESTORS EXCHANGE LLC.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	<p>WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM AND ITS AFFILIATE CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT THEY FAILED TO TIMELY FILE AMENDMENTS FOR THEIR REGISTERED REPRESENTATIVES' FORMS U4 TO UPDATE THE REPRESENTATIVES' OBAS AND TO REFLECT CHANGES IN THE REPRESENTATIVES' BUSINESS ADDRESSES. THE FINDINGS STATED THAT THE FIRMS DISCOVERED THAT THEY HAD FAILED TO TIMELY FILE FORM U4 AMENDMENTS AND BEGAN FILING THE LATE AMENDMENTS. THE FINDINGS ALSO STATED THAT THE FIRMS FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE FIRM'S OBLIGATION TO TIMELY FILE FORMS U4 AMENDMENTS. THE FIRMS SHARE COMMON SUPERVISORY SYSTEMS AND PROCEDURES RELATING TO THE FILING OF FORM U4 AMENDMENTS AND DID NOT HAVE ANY SYSTEM IN PLACE TO VERIFY THAT SUCH AMENDMENTS WERE TIMELY FILED. BEFORE THE FIRMS DISCOVERED THEIR FAILURE TO TIMELY FILE FORM U4 AMENDMENTS, THE FIRMS LACKED A SYSTEM TO TRACK WHETHER AMENDMENTS HAD BEEN TIMELY FILED, AND THE FIRMS' INTERNAL QUALITY ASSURANCE/QUALITY CONTROL METRICS DID NOT MEASURE THE TIMELINESS OF FORM U4 AMENDMENTS.</p>
Initiated By:	FINRA
Date Initiated:	09/23/2024
Docket/Case Number:	2023078116101
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	



Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	09/23/2024
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$60,000.00
Other Sanctions Ordered:	
Sanction Details:	THE FIRM WAS CENSURED AND FINED \$60,000. FINE PAID IN FULL ON OCTOBER 22, 2024.
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Reporting Source:	Firm
Current Status:	Final
Allegations:	THE FINANCIAL INDUSTRY REGULATORY AUTHORITY (FINRA) ALLEGED THAT BETWEEN JULY 2022 AND DECEMBER 2022, BOFA SECURITIES, INC. (BOFAS) AND MERRILL LYNCH, PIERCE, FENNER & SMITH (MLPFS) FAILED TO TIMELY FILE AMENDMENTS FOR THEIR REGISTERED REPRESENTATIVES' UNIFORM APPLICATIONS FOR SECURITIES INDUSTRY REGISTRATION (FORMS U4) TO UPDATE THE REPRESENTATIVES' OUTSIDE BUSINESS ACTIVITIES AND TO REFLECT CHANGES IN THE REPRESENTATIVES' BUSINESS ADDRESSES, IN VIOLATION OF ARTICLE V, SECTION 2(C) OF FINRA'S BY-LAWS AND FINRA RULES 1122 AND 2010, AND FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ENSURE THE TIMELY FILING OF FORM U4 AMENDMENTS, IN VIOLATION OF FINRA RULES 3110 AND 2010.
Initiated By:	FINANCIAL INDUSTRY REGULATORY AUTHORITY
Date Initiated:	09/23/2024
Docket/Case Number:	2023078116101
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:	CENSURE
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	09/23/2024
Sanctions Ordered:	Censure Monetary/Fine \$60,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS AGREED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$60,000. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS AGREED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$60,000. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM AND ITS AFFILIATED CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE A SUPERVISORY SYSTEM AND WRITTEN SUPERVISORY PROCEDURES THAT WERE REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING, IN VIOLATION OF NYSE ARCA RULES 11.18(B) AND (C). THE FINDINGS STATED THAT, THE PARAMETERS IN THE FIRM'S AUTOMATED SURVEILLANCE SYSTEM WERE TOO NARROW TO IDENTIFY POTENTIALLY MANIPULATIVE WASH TRADING AND PREARRANGED TRADING. SECOND, THE FIRM DID NOT TAKE REASONABLE STEPS DURING THE RELEVANT PERIOD TO DETERMINE WHETHER THESE PARAMETERS WERE REASONABLE OR WHETHER CHANGES TO THE PARAMETERS OR ADDITIONAL SURVEILLANCES WERE NECESSARY TO REASONABLY SURVEIL FOR WASH TRADES AND POTENTIALLY MANIPULATIVE PREARRANGED TRADING. THE FIRM COULD NOT EXPLAIN WHY IT INITIALLY SELECTED THE PARTICULAR MODULES THAT IT USED OR WHY IT DID NOT SELECT OTHER MODULES THAT WERE AVAILABLE FROM THE VENDOR. ADDITIONALLY, ALTHOUGH THE FIRM'S PROCEDURES INCLUDED A REVIEW PROCESS FOR ONE OF ITS SURVEILLANCE SYSTEMS, THE PROCEDURES PROVIDED INSUFFICIENT GUIDANCE REGARDING HOW



PARAMETER CHANGE DECISIONS SHOULD BE MADE OR DOCUMENTED. THIRD, PRIOR TO JANUARY 2019, MERRILL HAD NO SYSTEM TO DETECT WASH TRADING IN WARRANTS. ALTHOUGH MERRILL'S SURVEILLANCE SYSTEM WAS CAPABLE OF SURVEILLING FOR WASH TRADING IN WARRANTS IN 2016, BECAUSE OF A CODING ERROR, MERRILL DID NOT INCLUDE WARRANTS IN THE SURVEILLANCE MODULES UNTIL JANUARY 2019. FOURTH, FROM OCTOBER 2016 TO JULY 2019, THE FIRM FAILED TO REVIEW ALERTS GENERATED BY THREE OF ITS WASH TRADING AND PREARRANGED TRADING SURVEILLANCE PATTERNS IN EQUITIES AND OPTIONS. THE FIRM DID NOT DISCOVER THE ISSUE UNTIL AUGUST 2020, WHEN RESPONDING TO A REGULATORY INQUIRY, EVEN THOUGH THERE WERE NUMEROUS RED FLAGS, SUCH AS INTERNAL TESTING RESULTS, THAT SHOULD HAVE ALERTED THE FIRM TO THE FACT THAT THESE ALERTS WERE NOT BEING REVIEWED. OVERALL, THE FIRM DID NOT REVIEW APPROXIMATELY 155 ALERTS REPRESENTING APPROXIMATELY 700 POTENTIALLY MANIPULATIVE EQUITY TRADES AND APPROXIMATELY 1,000 ALERTS REPRESENTING APPROXIMATELY 125,000 POTENTIALLY MANIPULATIVE OPTIONS TRADES.

Initiated By: NYSE ARCA, INC.

Date Initiated: 08/19/2024

Docket/Case Number: 2017055087008

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 08/19/2024

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

Sanctions Ordered: Censure
Monetary/Fine \$333,000.00

Other Sanctions Ordered:



Sanction Details:	THE FIRM IS CENSURED AND FINED, JOINTLY AND SEVERALLY, \$333,000. THIS MATTER WAS RESOLVED WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$3 MILLION WITH THE BALANCE TO BE PAID TO: FINRA, THE NASDAQ STOCK MARKET, LLC, CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., AND INVESTORS EXCHANGE, LLC.
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Reporting Source:	Firm
Current Status:	Final
Allegations:	NYSE ARCA, INC. (ARCA) ALLEGED THAT BOFA SECURITIES, INC. (BOFAS), FROM JULY 2019 TO PRESENT, AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED (MLPFS), FROM DECEMBER 2015 TO JULY 2019, FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE A SUPERVISORY SYSTEM AND WRITTEN SUPERVISORY PROCEDURES REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING BY CUSTOMERS OF BOFAS AND MLPFS, IN VIOLATION OF NYSE ARCA RULES 11.18(B) AND (C) (SUPERVISION).
Initiated By:	NYSE ARCA, INC.
Date Initiated:	08/28/2024
Docket/Case Number:	NO. 2017055087008
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	08/28/2024
Sanctions Ordered:	Censure Monetary/Fine \$333,000.00
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS AND MLPFS CONSENTED TO THE IMPOSITION OF A CENSURE, A FINE IN THE AMOUNT OF \$333,000, AND CERTAIN UNDERTAKINGS. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFAS AND MLPFS REACHED WITH THE FINANCIAL



INDUSTRY REGULATORY AUTHORITY, THE NASDAQ STOCK MARKET LLC, CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., AND INVESTORS EXCHANGE LLC.

Firm Statement

WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS AND MLPFS CONSENTED TO THE IMPOSITION OF A CENSURE, A FINE IN THE AMOUNT OF \$333,000, AND CERTAIN UNDERTAKINGS. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFAS AND MLPFS REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, THE NASDAQ STOCK MARKET LLC, CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., AND INVESTORS EXCHANGE LLC.

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Reporting Source: Regulator

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM AND ITS AFFILIATE CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT THEY FAILED TO HAVE A SUPERVISORY SYSTEM REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING BY THEIR CUSTOMERS, IN VIOLATION OF IEX RULES 5.110 AND 3.110. THE FINDINGS STATED THAT THE FIRMS RELIED ON A NUMBER OF THIRD-PARTY AUTOMATED SURVEILLANCES TO SURVEIL FOR POTENTIALLY MANIPULATIVE ACTIVITY, INCLUDING WASH TRADING AND PREARRANGED TRADING. THE PARAMETERS IN THE FIRMS' AUTOMATED SURVEILLANCE SYSTEM WERE TOO NARROW TO IDENTIFY POTENTIALLY MANIPULATIVE WASH TRADING AND PREARRANGED TRADING. SECOND, THE FIRMS DID NOT TAKE REASONABLE STEPS DURING THE RELEVANT PERIOD TO DETERMINE WHETHER THESE PARAMETERS WERE REASONABLE OR WHETHER CHANGES TO THE PARAMETERS OR ADDITIONAL SURVEILLANCES WERE NECESSARY TO REASONABLY SURVEIL FOR WASH TRADES AND POTENTIALLY MANIPULATIVE PREARRANGED TRADING. THE FIRMS COULD NOT EXPLAIN WHY THEY INITIALLY SELECTED THE PARTICULAR MODULES THAT IT USED OR WHY THEY DID NOT SELECT OTHER MODULES THAT WERE AVAILABLE FROM THE VENDOR. ADDITIONALLY, ALTHOUGH THE FIRMS' PROCEDURES INCLUDED A REVIEW PROCESS FOR ONE OF THEIR SURVEILLANCE SYSTEMS, THE PROCEDURES PROVIDED INSUFFICIENT GUIDANCE REGARDING HOW PARAMETER CHANGE DECISIONS SHOULD BE MADE OR DOCUMENTED. THIRD, PRIOR TO JANUARY 2019, THE FIRMS HAD NO SYSTEM TO DETECT WASH TRADING IN WARRANTS. ALTHOUGH THE



FIRMS' SURVEILLANCE SYSTEM WAS CAPABLE OF SURVEILLING FOR WASH TRADING IN WARRANTS IN 2016, BECAUSE OF A CODING ERROR, THEY DID NOT INCLUDE WARRANTS IN THE SURVEILLANCE MODULES UNTIL JANUARY 2019. FOURTH, FROM OCTOBER 2016 TO AUGUST 2020, THE FIRMS FAILED TO REVIEW ALERTS GENERATED BY THREE OF THEIR WASH TRADING AND PREARRANGED TRADING SURVEILLANCE PATTERNS IN EQUITIES AND OPTIONS. THE FIRMS DID NOT DISCOVER THE ISSUE UNTIL AUGUST 2020, WHEN RESPONDING TO A REGULATORY INQUIRY, EVEN THOUGH THERE WERE NUMEROUS RED FLAGS, SUCH AS INTERNAL TESTING RESULTS, THAT SHOULD HAVE ALERTED THE FIRMS TO THE FACT THAT THESE ALERTS WERE NOT BEING REVIEWED. OVERALL, THE FIRMS DID NOT REVIEW APPROXIMATELY 155 ALERTS REPRESENTING APPROXIMATELY 700 POTENTIALLY MANIPULATIVE EQUITY TRADES AND APPROXIMATELY 1,000 ALERTS REPRESENTING APPROXIMATELY 125,000 POTENTIALLY MANIPULATIVE OPTIONS TRADES.

Initiated By:	INVESTORS' EXCHANGE LLC
Date Initiated:	08/28/2024
Docket/Case Number:	2017055087001
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	08/28/2024
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$333,000.00
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	THE FIRMS ARE CENSURED, FINED \$333,000, AND REQUIRED TO CERTIFY THAT THEY HAVE REMEDIATED THE ISSUES IDENTIFIED IN THE AWC AND IMPLEMENTED A REASONABLY DESIGNED SUPERVISORY SYSTEM,



INCLUDING WSPS. THIS MATTER WAS RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$3 MILLION, THE REMAINDER OF WHICH SHALL BE PAID TO THE NASDAQ STOCK MARKET, LLC, NYSE ARCA, INC., CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC. AND FINRA.

Reporting Source:	Firm
Current Status:	Final
Allegations:	THE INVESTORS EXCHANGE LLC (IEX) ALLEGED THAT BOFA SECURITIES, INC. (BOFAS), FROM 2019 TO PRESENT, AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED (MLPFS), FROM AUGUST 2016 THROUGH PRESENT, FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM AND WRITTEN SUPERVISORY PROCEDURES REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING BY CUSTOMERS OF BOFAS AND MLPFS, IN VIOLATION OF IEX RULES 5.110 AND 3.110.
Initiated By:	INVESTORS EXCHANGE LLC
Date Initiated:	08/28/2024
Docket/Case Number:	NO. 2017055087001
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	UNDERTAKING
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	08/28/2024
Sanctions Ordered:	Censure Monetary/Fine \$333,000.00
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS AND MLPFS CONSENTED TO THE IMPOSITION OF A CENSURE, A FINE IN THE AMOUNT OF \$333,000, AND CERTAIN UNDERTAKINGS. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFAS AND MLPFS REACHED WITH NYSE ARCA, INC., CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE BYX



EXCHANGE, INC., CBOE BZX EXCHANGE, INC., AND THE NASDAQ STOCK MARKET LLC, AND THE FINANCIAL INDUSTRY REGULATORY AUTHORITY.

Firm Statement

WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS AND MLPFS CONSENTED TO THE IMPOSITION OF A CENSURE, A FINE IN THE AMOUNT OF \$333,000, AND CERTAIN UNDERTAKINGS. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFAS AND MLPFS REACHED WITH NYSE ARCA, INC., CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., AND THE NASDAQ STOCK MARKET LLC, AND THE FINANCIAL INDUSTRY REGULATORY AUTHORITY.

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Reporting Source:

Regulator

Current Status:

Final

Allegations:

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM AND ITS AFFILIATE CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT THEY FAILED TO HAVE A SUPERVISORY SYSTEM REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING BY THEIR CUSTOMERS, IN VIOLATION OF NASDAQ RULES GENERAL 9, SECTION 20 AND GENERAL 9, SECTION 1(A). THE FINDINGS STATED THAT THE FIRMS RELIED ON A NUMBER OF THIRD-PARTY AUTOMATED SURVEILLANCES TO SURVEIL FOR POTENTIALLY MANIPULATIVE ACTIVITY, INCLUDING WASH TRADING AND PREARRANGED TRADING. FIRST, THE PARAMETERS IN THE FIRMS' AUTOMATED SURVEILLANCE SYSTEM WERE TOO NARROW TO IDENTIFY POTENTIALLY MANIPULATIVE WASH TRADING AND PREARRANGED TRADING. SECOND, THE FIRMS DID NOT TAKE REASONABLE STEPS DURING THE RELEVANT PERIOD TO DETERMINE WHETHER THESE PARAMETERS WERE REASONABLE OR WHETHER CHANGES TO THE PARAMETERS OR ADDITIONAL SURVEILLANCES WERE NECESSARY TO REASONABLY SURVEIL FOR WASH TRADES AND POTENTIALLY MANIPULATIVE PREARRANGED TRADING. THE FIRMS COULD NOT EXPLAIN WHY IT INITIALLY SELECTED THE PARTICULAR MODULES THAT THEY USED OR WHY THEY DID NOT SELECT OTHER MODULES THAT WERE AVAILABLE FROM THE VENDOR. ADDITIONALLY, ALTHOUGH THE FIRMS' PROCEDURES INCLUDED A REVIEW PROCESS FOR ONE OF ITS SURVEILLANCE SYSTEMS, THE PROCEDURES PROVIDED INSUFFICIENT GUIDANCE REGARDING HOW PARAMETER CHANGE DECISIONS SHOULD BE MADE OR DOCUMENTED. THIRD, PRIOR TO JANUARY 2019, THE FIRMS HAD NO SYSTEM TO DETECT WASH TRADING IN WARRANTS. ALTHOUGH THE FIRMS' SURVEILLANCE SYSTEM WAS CAPABLE OF SURVEILLING FOR WASH TRADING IN WARRANTS IN 2016, BECAUSE OF A CODING ERROR,



THEY DID NOT INCLUDE WARRANTS IN THE SURVEILLANCE MODULES UNTIL JANUARY 2019. FOURTH, FROM OCTOBER 2016 TO AUGUST 2020, THE FIRMS FAILED TO REVIEW ALERTS GENERATED BY THREE OF THEIR WASH TRADING AND PREARRANGED TRADING SURVEILLANCE PATTERNS IN EQUITIES AND OPTIONS. THE FIRMS DID NOT DISCOVER THE ISSUE UNTIL AUGUST 2020, WHEN RESPONDING TO A REGULATORY INQUIRY, EVEN THOUGH THERE WERE NUMEROUS RED FLAGS, SUCH AS INTERNAL TESTING RESULTS, THAT SHOULD HAVE ALERTED THE FIRMS TO THE FACT THAT THESE ALERTS WERE NOT BEING REVIEWED. OVERALL, THE FIRMS DID NOT REVIEW APPROXIMATELY 155 ALERTS REPRESENTING APPROXIMATELY 700 POTENTIALLY MANIPULATIVE EQUITY TRADES AND APPROXIMATELY 1,000 ALERTS REPRESENTING APPROXIMATELY 125,000 POTENTIALLY MANIPULATIVE OPTIONS TRADES.

Initiated By:	NASDAQ STOCK MARKET
Date Initiated:	08/28/2024
Docket/Case Number:	2017055087002
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	08/28/2024
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$333,000.00
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	THE FIRMS ARE CENSURED, FINED \$333,000, AND REQUIRED TO CERTIFY THAT THEY HAVE REMEDIATED THE ISSUES IDENTIFIED IN THE AWC AND IMPLEMENTED A REASONABLY DESIGNED SUPERVISORY SYSTEM, INCLUDING WSPS. THIS MATTER WAS RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$3 MILLION, THE REMAINDER OF



WHICH SHALL BE PAID TO THE EXCHANGES AND FINRA.

Reporting Source: Firm

Current Status: Final

Allegations: THE NASDAQ STOCK MARKET LLC (NASDAQ) ALLEGED THAT BOFA SECURITIES, INC. (BOFAS), FROM 2019 TO PRESENT, AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED (MLPFS), FROM DECEMBER 2015 THROUGH PRESENT, FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM AND WRITTEN SUPERVISORY PROCEDURES REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING BY CUSTOMERS OF BOFAS AND MLPFS, IN VIOLATION OF NASDAQ RULES GENERAL 9, SECTION 20(A) AND ITS PREDECESSOR, NASDAQ RULE 3010, AND NASDAQ RULE GENERAL 9, SECTION 1(A) AND ITS PREDECESSOR, NASDAQ RULE 2010A..

Initiated By: THE NASDAQ STOCK MARKET LLC

Date Initiated: 08/28/2024

Docket/Case Number: NO. 2017055087002

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought: UNDERTAKING

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 08/28/2024

Sanctions Ordered: Censure
Monetary/Fine \$333,000.00

Other Sanctions Ordered: UNDERTAKING

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS AND MLPFS CONSENTED TO THE IMPOSITION OF A CENSURE, A FINE IN THE AMOUNT OF \$333,000, AND CERTAIN UNDERTAKINGS. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFAS AND MLPFS REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, NYSE ARCA, INC., CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., AND INVESTORS EXCHANGE LLC.

**Firm Statement**

WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS AND MLPFS CONSENTED TO THE IMPOSITION OF A CENSURE, A FINE IN THE AMOUNT OF \$333,000, AND CERTAIN UNDERTAKINGS. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFAS AND MLPFS REACHED WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, NYSE ARCA, INC., CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., AND INVESTORS EXCHANGE LLC.

Disclosure 21 of 69**Reporting Source:**

Regulator

Current Status:

Final

Allegations:

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM AND ONE OF ITS AFFILIATES CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT THEY FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM AND WSPS REASONABLY DESIGNED TO DETECT POTENTIALLY MANIPULATIVE TRADING. THE FINDINGS STATED THAT THE FIRMS RELIED ON A NUMBER OF THIRD-PARTY AUTOMATED SURVEILLANCES TO SURVEIL FOR POTENTIALLY MANIPULATIVE ACTIVITY, INCLUDING WASH TRADING AND PREARRANGED TRADING. THESE SURVEILLANCES WERE DEFICIENT IN SEVERAL RESPECTS. SPECIFICALLY, THE PARAMETERS IN THE FIRMS' AUTOMATED SURVEILLANCE SYSTEM WERE TOO NARROW TO IDENTIFY POTENTIALLY MANIPULATIVE WASH TRADING AND PREARRANGED TRADING. FURTHER, THE FIRMS DID NOT TAKE REASONABLE STEPS TO DETERMINE WHETHER THE PARAMETERS WERE REASONABLE OR WHETHER CHANGES TO THE PARAMETERS OR ADDITIONAL SURVEILLANCES WERE NECESSARY TO REASONABLY SURVEIL FOR WASH TRADES AND POTENTIALLY MANIPULATIVE PREARRANGED TRADING. IN ADDITION, ALTHOUGH THE FIRMS' PROCEDURES INCLUDED A REVIEW PROCESS FOR ONE OF ITS SURVEILLANCE SYSTEMS, THE PROCEDURES PROVIDED INSUFFICIENT GUIDANCE REGARDING HOW PARAMETER CHANGE DECISIONS SHOULD BE MADE OR DOCUMENTED. AT CERTAIN TIMES, THE AFFILIATE EXCLUDED FROM ITS SURVEILLANCES TRADING IN OTC SECURITIES AND WARRANTS. BETWEEN JULY 2017 AND OCTOBER 2018, THE AFFILIATE FAILED TO HAVE A SURVEILLANCE SYSTEM IN PLACE TO DETECT WASH TRADING, PREARRANGED TRADES, MATCHED TRADES OR SPOOFING AND LAYERING IN OTC SECURITIES BECAUSE IT HAD FAILED TO PURCHASE THE OTC DATA FEED FROM ITS THIRD-PARTY VENDOR. ALTHOUGH THE FIRM'S SURVEILLANCE SYSTEM WAS CAPABLE OF SURVEILLING FOR WASH TRADING IN WARRANTS IN 2016, BECAUSE OF A CODING ERROR, THE FIRM DID NOT INCLUDE WARRANTS IN THE SURVEILLANCE MODULES UNTIL JANUARY 2019. FURTHERMORE, THE FIRMS FAILED TO REVIEW



ALERTS GENERATED BY THREE OF ITS WASH TRADING AND PREARRANGED TRADING SURVEILLANCE PATTERNS IN EQUITIES AND OPTIONS. THE FIRMS DID NOT DISCOVER THE ISSUE UNTIL THEY RESPONDED TO A REGULATORY INQUIRY, EVEN THOUGH THERE WERE NUMEROUS RED FLAGS, SUCH AS INTERNAL TESTING RESULTS, THAT SHOULD HAVE ALERTED THEM TO THE FACT THAT THESE ALERTS WERE NOT BEING REVIEWED.

Initiated By: FINRA

Date Initiated: 08/28/2024

Docket/Case Number: [2017055087003](#)

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 08/28/2024

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

Sanctions Ordered: Censure
Monetary/Fine \$669,000.00

Other Sanctions Ordered: UNDERTAKING

Sanction Details: THE FIRMS WERE CENSURED, FINED A TOTAL OF \$3,000,000, OF WHICH \$669,000 IS PAYABLE TO FINRA, AND REQUIRED TO CERTIFY THAT THEY HAVE REMEDIATED THE ISSUES IDENTIFIED IN THE AWC AND IMPLEMENTED A REASONABLY DESIGNED SUPERVISORY SYSTEM, INCLUDING WSPS. FINE PAID IN FULL ON SEPTEMBER 13, 2024.

Reporting Source: Firm

Current Status: Final

Allegations: THE FINANCIAL INDUSTRY REGULATORY AUTHORITY (FINRA) ALLEGED



THAT BOFA SECURITIES, INC. (BOFAS), FROM 2019 TO PRESENT, AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED (MLPFS), FROM DECEMBER 2015 THROUGH PRESENT, FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM AND WRITTEN SUPERVISORY PROCEDURES REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING BY CUSTOMERS OF BOFAS AND MLPFS, IN VIOLATION OF FINRA RULES 3110(A), 3110(B), AND 2010.

Initiated By:	FINANCIAL INDUSTRY REGULATORY AUTHORITY
Date Initiated:	08/28/2024
Docket/Case Number:	NO. 2017055087003
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	UNDERTAKING
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	08/28/2024
Sanctions Ordered:	Censure Monetary/Fine \$669,000.00
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS AND MLPFS CONSENTED TO THE IMPOSITION OF A CENSURE, A FINE IN THE AMOUNT OF \$669,000, AND CERTAIN UNDERTAKINGS. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFAS AND MLPFS REACHED WITH THE NASDAQ STOCK EXCHANGE LLC, NYSE ARCA, INC., CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., AND INVESTORS EXCHANGE LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, BOFAS AND MLPFS CONSENTED TO THE IMPOSITION OF A CENSURE, A FINE IN THE AMOUNT OF \$669,000, AND CERTAIN UNDERTAKINGS. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT BOFAS AND MLPFS REACHED WITH THE NASDAQ STOCK EXCHANGE LLC, NYSE ARCA, INC., CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., AND INVESTORS EXCHANGE LLC.



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Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>MIAX EMERALD, LLC (EMERALD) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) DID NOT ACCURATELY RECORD TRANSMISSION TIMES FOR CERTAIN MANUAL OPTIONS ORDERS ROUTED TO VARIOUS OPTIONS EXCHANGES, INCLUDING EMERALD, FROM OCTOBER 2019 TO DECEMBER 2022, IN VIOLATION OF EMERALD RULE 800 AND SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND RULE 17A-3 THEREUNDER; AND FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN PROCEDURES, AND A SYSTEM FOR APPLYING SUCH PROCEDURES, TO ASSURE THE ACCURATE RECORDING OF ORDER TRANSMISSION TIMES FROM OCTOBER 2019 TO APRIL 2023, IN VIOLATION OF EMERALD RULE 300.</p>
Initiated By:	MIAX EMERALD, LLC
Date Initiated:	06/27/2024
Docket/Case Number:	NO. 2020067485612
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CENSURE
Resolution:	Consent
Resolution Date:	06/27/2024
Sanctions Ordered:	Censure Monetary/Fine \$193,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	<p>WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$19,300. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ OPTIONS MARKET LLC, NASDAQ GEMX, LLC,</p>



NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL STOCK EXCHANGE, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

Firm Statement

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$19,300. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ OPTIONS MARKET LLC, NASDAQ GEMX, LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL STOCK EXCHANGE, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

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Reporting Source: Firm

Current Status: Final

Allegations: BOX EXCHANGE LLC (BOX) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) DID NOT RECORD ACCURATE TRANSMISSION TIMES FOR CERTAIN MANUAL OPTIONS ORDERS ROUTED TO VARIOUS OPTIONS EXCHANGES, INCLUDING BOX FROM OCTOBER 2019 THROUGH DECEMBER 2022, IN VIOLATION OF BOX RULE 10000 AND SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND RULE 17A-3 THEREUNDER; AND FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN PROCEDURES, AND A SYSTEM FOR APPLYING SUCH PROCEDURES, TO ASSURE THE ACCURATE RECORDING OF ORDER TRANSMISSION TIMES FROM OCTOBER 2019 TO APRIL 2023, IN VIOLATION OF BOX RULE 3010.

Initiated By: BOX EXCHANGE LLC

Date Initiated: 06/27/2024

Docket/Case Number: 2020067485614

Principal Product Type: Options

Other Product Type(s):

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

Other Sanction(s)/Relief Sought: CENSURE

Resolution: Consent



Resolution Date:	06/27/2024
Sanctions Ordered:	Censure Monetary/Fine \$30,400.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$30,400. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ OPTIONS MARKET LLC, NASDAQ GEMX, LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, AND MIAX PEARL, LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$30,400. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ OPTIONS MARKET LLC, NASDAQ GEMX, LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, AND MIAX PEARL, LLC.

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Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>MIAX PEARL, LLC (PEARL) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) DID NOT ACCURATELY RECORD TRANSMISSION TIMES FOR CERTAIN MANUAL OPTIONS ORDERS ROUTED TO VARIOUS OPTIONS EXCHANGES, INCLUDING PEARL FROM OCTOBER 2019 TO DECEMBER 2022, IN VIOLATION OF PEARL RULE 800 AND SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND RULE 17A-3 THEREUNDER; AND FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN PROCEDURES, AND A SYSTEM FOR APPLYING SUCH PROCEDURES, TO ACHIEVE THE ACCURATE RECORDING OF ORDER TRANSMISSION TIMES FROM OCTOBER 2019 TO APRIL 2023, IN VIOLATION OF PEARL RULES 300 AND 2300.</p>
Initiated By:	MIAX PEARL, LLC



Date Initiated:	06/27/2024
Docket/Case Number:	NO. 2020067485611
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CENSURE
Resolution:	Consent
Resolution Date:	06/27/2024
Sanctions Ordered:	Censure Monetary/Fine \$19,150.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$19,150. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ OPTIONS MARKET LLC, NASDAQ GEMX, LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL STOCK EXCHANGE, LLC, MIAX EMERALD, LLC, AND BOX EXCHANGE LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$19,150. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ OPTIONS MARKET LLC, NASDAQ GEMX, LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL STOCK EXCHANGE, LLC, MIAX EMERALD, LLC, AND BOX EXCHANGE LLC.

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Reporting Source:	Firm
Current Status:	Final



Allegations:	MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC (MIAX) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) DID NOT ACCURATELY RECORD TRANSMISSION TIMES FOR CERTAIN MANUAL OPTIONS ORDERS ROUTED TO VARIOUS OPTIONS EXCHANGES, INCLUDING MIAX, FROM OCTOBER 2019 TO DECEMBER 2022, IN VIOLATION OF MIAX RULE 800 AND SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND RULE 17A-3 THEREUNDER; AND FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN PROCEDURES, AND A SYSTEM FOR APPLYING SUCH PROCEDURES, TO ENSURE THE ACCURATE RECORDING OF ORDER TRANSMISSION TIMES FROM OCTOBER 2019 TO APRIL 2023, IN VIOLATION OF MIAX RULE 300.
Initiated By:	MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC
Date Initiated:	06/27/2024
Docket/Case Number:	NO. 2020067485613
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CENSURE
Resolution:	Consent
Resolution Date:	06/27/2024
Sanctions Ordered:	Censure Monetary/Fine \$21,730.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$21,730. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ OPTIONS MARKET LLC, NASDAQ GEMX, LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$21,730. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A



TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ OPTIONS MARKET LLC, NASDAQ GEMX, LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT BETWEEN AUGUST 2019 AND AUGUST 2022, BOFA SECURITIES, INC. ("BOFAS" OR THE "FIRM") VIOLATED NYSE AMERICAN RULE 5190 (NOTIFICATION REQUIREMENTS FOR OFFERING PARTICIPANTS) IN 104 INSTANCES BY SUBMITTING UNTIMELY AND INACCURATE NOTIFICATIONS TO NYSE AMERICAN IN CONNECTION WITH ITS PARTICIPATION IN DISTRIBUTIONS OF SECURITIES SUBJECT TO REGULATION M UNDER THE SECURITIES EXCHANGE ACT OF 1934 (THE "EXCHANGE ACT"). THE FINDINGS STATED THAT BETWEEN AUGUST 2019 AND MARCH 2024, BOFAS ALSO VIOLATED NYSE AMERICAN RULE 3110(A) AND (B) (SUPERVISION) BY FAILING TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES ("WSPS"), REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH NYSE AMERICAN RULE 5190.
Initiated By:	NYSE AMERICAN LLC
Date Initiated:	05/27/2024
Docket/Case Number:	2020066382604
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	05/27/2024



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$52,560.00
Other Sanctions Ordered:	
Sanction Details:	THE FIRM IS CENSURED AND FINED \$52,560 (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$350,000). THOSE MATTERS WERE BROUGHT BY FINRA, THE NEW YORK STOCK EXCHANGE LLC, NYSE ARCA, INC., NYSE NATIONAL, INC., NYSE CHICAGO, INC., AND THE NASDAQ STOCK MARKET LLC.
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Reporting Source:	Firm
Current Status:	Final
Allegations:	NYSE AMERICAN LLC (NYSE AMERICAN) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) SUBMITTED UNTIMELY AND INACCURATE NOTIFICATIONS TO NYSE AMERICAN IN CONNECTION WITH ITS PARTICIPATION IN DISTRIBUTIONS OF CERTAIN SECURITIES SUBJECT TO REGULATION M FROM AUGUST 2019 TO AUGUST 2022, IN VIOLATION OF NYSE AMERICAN RULE 5190; AND FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH NYSE AMERICAN RULE 5190 FROM AUGUST 2019 TO MARCH 2024, IN VIOLATION OF NYSE AMERICAN RULE 3110(A) AND (B).
Initiated By:	NYSE AMERICAN LLC
Date Initiated:	05/27/2024
Docket/Case Number:	NO. 2020066382604
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)



Resolution Date:	05/27/2024
Sanctions Ordered:	Censure Monetary/Fine \$52,560.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$52,560. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH FINRA, THE NEW YORK STOCK EXCHANGE LLC, NYSE ARCA, INC., NYSE NATIONAL, INC., NYSE CHICAGO, INC., AND THE NASDAQ STOCK MARKET LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$52,560. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH FINRA, THE NEW YORK STOCK EXCHANGE LLC, NYSE ARCA, INC., NYSE NATIONAL, INC., NYSE CHICAGO, INC., AND THE NASDAQ STOCK MARKET LLC.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS BETWEEN DECEMBER 2019 AND AUGUST 2022, BOFA SECURITIES, INC. ("BOFAS" OR THE "FIRM") VIOLATED NYSE NATIONAL RULE 11.5190 (NOTIFICATION REQUIREMENTS FOR OFFERING PARTICIPANTS) IN 85 INSTANCES BY SUBMITTING UNTIMELY AND INACCURATE NOTIFICATIONS TO NYSE NATIONAL, INC. IN CONNECTION WITH ITS PARTICIPATION IN DISTRIBUTIONS OF SECURITIES SUBJECT TO REGULATION M UNDER THE SECURITIES EXCHANGE ACT OF 1934 (THE "EXCHANGE ACT"). THE FINDINGS STATED THAT BETWEEN AUGUST 2019 AND MARCH 2024, BOFAS ALSO VIOLATED NYSE NATIONAL RULES 11.5.1 (WRITTEN PROCEDURES) AND 11.3.2 (VIOLATIONS PROHIBITED) BY FAILING TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES ("WSPS"), REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE NYSE NATIONAL RULE 11.5190.
Initiated By:	NYSE NATIONAL, INC.
Date Initiated:	05/27/2024



Docket/Case Number:	2020066382606
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	05/27/2024
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$44,720.00
Other Sanctions Ordered:	
Sanction Details:	THE FIRM WAS CENSURED AND FINED \$44,720 (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$350,000). THOSE MATTERS WERE BROUGHT BY FINRA, THE NEW YORK STOCK EXCHANGE LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., NYSE CHICAGO, INC., AND THE NASDAQ STOCK MARKET LLC.
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Reporting Source:	Firm
Current Status:	Final
Allegations:	NYSE NATIONAL, INC. (NYSE NATIONAL) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) SUBMITTED UNTIMELY AND INACCURATE NOTIFICATIONS TO NYSE NATIONAL IN CONNECTION WITH ITS PARTICIPATION IN DISTRIBUTIONS OF SECURITIES SUBJECT TO REGULATION M FROM DECEMBER 2019 TO AUGUST 2022, IN VIOLATION OF NYSE NATIONAL RULE 11.5190; AND FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH NYSE NATIONAL RULE 11.5190 FROM AUGUST 2019 TO MARCH 2024, IN VIOLATION OF NYSE NATIONAL RULES 11.5.1 AND 11.3.2.
Initiated By:	NYSE NATIONAL, INC.



Date Initiated:	05/27/2024
Docket/Case Number:	NO. 2020066382606
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	05/27/2024
Sanctions Ordered:	Censure Monetary/Fine \$44,720.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$44,720. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH FINRA, THE NEW YORK STOCK EXCHANGE LLC, NYSE ARCA, INC., NYSE AMERICAN LLC, NYSE CHICAGO, INC., AND THE NASDAQ STOCK MARKET LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$44,720. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH FINRA, THE NEW YORK STOCK EXCHANGE LLC, NYSE ARCA, INC., NYSE AMERICAN LLC, NYSE CHICAGO, INC., AND THE NASDAQ STOCK MARKET LLC.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS BETWEEN AUGUST 2019 AND AUGUST 2022, BOFA SECURITIES, INC. ("BOFAS" OR THE "FIRM") VIOLATED NYSE RULE 5190 (NOTIFICATION REQUIREMENTS FOR OFFERING PARTICIPANTS) IN 121 INSTANCES BY SUBMITTING UNTIMELY AND INACCURATE NOTIFICATIONS TO THE NEW YORK STOCK EXCHANGE



("NYSE") IN CONNECTION WITH ITS PARTICIPATION IN DISTRIBUTIONS OF SECURITIES SUBJECT TO REGULATION M UNDER THE SECURITIES EXCHANGE ACT OF 1934 (THE "EXCHANGE ACT"). THE FINDINGS STATED THAT BETWEEN AUGUST 2019 AND MARCH 2024, BOFAS ALSO VIOLATED NYSE RULE 3110(A) AND (B) (SUPERVISION) BY FAILING TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES ("WSPS"), REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE NYSE RULE 5190.

Initiated By: NEW YORK STOCK EXCHANGE

Date Initiated: 05/27/2024

Docket/Case Number: 2020066382603

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 05/27/2024

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

Sanctions Ordered: Censure
Monetary/Fine \$59,560.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$59,560 (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$350,000). THOSE MATTERS WERE BROUGHT BY FINRA, NYSE AMERICAN LLC, NYSE ARCA, INC., NYSE NATIONAL, INC., NYSE CHICAGO, INC., AND THE NASDAQ STOCK MARKET LLC.

Reporting Source: Firm

Current Status: Final



Allegations:	THE NEW YORK STOCK EXCHANGE LLC (NYSE) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) SUBMITTED UNTIMELY AND INACCURATE NOTIFICATIONS TO NYSE IN CONNECTION WITH ITS PARTICIPATION IN DISTRIBUTIONS OF SECURITIES SUBJECT TO REGULATION M FROM AUGUST 2019 TO AUGUST 2022, IN VIOLATION OF NYSE RULE 5190; AND FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH NYSE RULE 5190 FROM AUGUST 2019 TO MARCH 2024, IN VIOLATION OF NYSE RULE 3110(A) AND (B).
Initiated By:	NEW YORK STOCK EXCHANGE LLC
Date Initiated:	05/27/2024
Docket/Case Number:	NO. 2020066382603
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	05/27/2024
Sanctions Ordered:	Censure Monetary/Fine \$59,560.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$59,560. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH FINRA, NYSE AMERICAN LLC, NYSE ARCA, INC., NYSE NATIONAL, INC., NYSE CHICAGO, INC., AND THE NASDAQ STOCK MARKET LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$59,560. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH FINRA, NYSE AMERICAN LLC, NYSE ARCA, INC., NYSE NATIONAL, INC., NYSE CHICAGO, INC., AND THE NASDAQ STOCK MARKET LLC.



Reporting Source: Regulator

Current Status: Final

Allegations: NYSE CHICAGO, INC. ("NYSE CHICAGO" OR THE "EXCHANGE"), PURSUANT TO ARTICLE 12, RULE 1(D) OF THE RULES OF THE EXCHANGE, IN LIEU OF FILING CHARGES, HEREBY ENTERS THIS ORDER AGAINST THE RESPONDENT BOFA SECURITIES, INC. ("RESPONDENT," OR THE "FIRM") INSTITUTING PROCEEDINGS, ACCEPTING AN OFFER OF SETTLEMENT, MAKING FINDINGS, AND IMPOSING SANCTIONS. IN ANTICIPATION OF THE INSTITUTION OF THESE PROCEEDINGS, THE RESPONDENT HAS SUBMITTED AN OFFER OF SETTLEMENT ("OFFER") TO NYSE CHICAGO, WHICH NYSE CHICAGO HAS DETERMINED TO ACCEPT. BETWEEN DECEMBER 2019 AND AUGUST 2022, BOFA SECURITIES VIOLATED NYSE CHICAGO RULE 11.5190 (NOTIFICATION REQUIREMENTS FOR OFFERING PARTICIPANTS) IN 49 INSTANCES BY SUBMITTING UNTIMELY AND INACCURATE NOTIFICATIONS TO NYSE CHICAGO, INC. IN CONNECTION WITH ITS PARTICIPATION IN DISTRIBUTIONS OF SECURITIES SUBJECT TO REGULATION M UNDER THE SECURITIES EXCHANGE ACT OF 1934 (THE "EXCHANGE ACT"). BETWEEN AUGUST 2019 AND MARCH 2024, BOFA SECURITIES ALSO VIOLATED NYSE CHICAGO ART. 6, RULES 5(C) AND 5(A) (SUPERVISION) BY FAILING TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES ("WSPS"), REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE NYSE CHICAGO RULE 11.5190.

Initiated By: NYSE CHICAGO, INC.

Date Initiated: 05/27/2024

Docket/Case Number: 2020066382607

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 05/27/2024



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?

No

Sanctions Ordered:

Censure

Monetary/Fine \$30,160.00

Other Sanctions Ordered:

Sanction Details:

THE FIRM WAS CENSURED AND FINED OF \$30,160 (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$350,000). THOSE MATTERS WERE BROUGHT BY FINRA, THE NEW YORK STOCK EXCHANGE LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., NYSE NATIONAL, INC., AND THE NASDAQ STOCK MARKET LLC.

Reporting Source:

Firm

Current Status:

Final

Allegations:

NYSE CHICAGO, INC. (NYSE CHICAGO) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) SUBMITTED UNTIMELY AND INACCURATE NOTIFICATIONS TO NYSE CHICAGO IN CONNECTION WITH ITS PARTICIPATION IN CERTAIN DISTRIBUTIONS OF SECURITIES SUBJECT TO REGULATION M FROM DECEMBER 2019 TO AUGUST 2022, IN VIOLATION OF NYSE CHICAGO RULE 11.5190; AND FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH NYSE CHICAGO RULE 11.5190 FROM AUGUST 2019 TO MARCH 2024, IN VIOLATION OF NYSE CHICAGO ARTICLE 6 RULES 5(C) AND 5(A).

Initiated By:

NYSE CHICAGO, INC.

Date Initiated:

05/27/2024

Docket/Case Number:

NO. 2020066382607

Principal Product Type:

No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Censure

Other Sanction(s)/Relief Sought:

Resolution:

Order



Resolution Date:	05/27/2024
Sanctions Ordered:	Censure Monetary/Fine \$30,160.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$30,160. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER. THE ORDER WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH FINRA, THE NEW YORK STOCK EXCHANGE LLC, NYSE ARCA, INC., NYSE NATIONAL, INC., NYSE AMERICAN LLC, AND THE NASDAQ STOCK MARKET LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$30,160. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER. THE ORDER WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH FINRA, THE NEW YORK STOCK EXCHANGE LLC, NYSE ARCA, INC., NYSE NATIONAL, INC., NYSE AMERICAN LLC, AND THE NASDAQ STOCK MARKET LLC.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS BETWEEN AUGUST 2019 AND AUGUST 2022, BOFA SECURITIES, INC. ("BOFAS" OR THE "FIRM") VIOLATED NYSE ARCA RULE 9.5190-E (NOTIFICATION REQUIREMENTS FOR OFFERING PARTICIPANTS) IN 127 INSTANCES BY SUBMITTING UNTIMELY AND INACCURATE NOTIFICATIONS TO NYSE ARCA, INC. IN CONNECTION WITH ITS PARTICIPATION IN DISTRIBUTIONS OF SECURITIES SUBJECT TO REGULATION M UNDER THE SECURITIES EXCHANGE ACT OF 1934 (THE "EXCHANGE ACT"). THE FINDINGS STATED THAT BETWEEN AUGUST 2019 AND MARCH 2024, BOFAS ALSO VIOLATED NYSE ARCA RULE 11.18 (SUPERVISION) BY FAILING TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES ("WSPS"), REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE NYSE ARCA RULE 9.5190-E.
Initiated By:	NYSE ARCA, INC.
Date Initiated:	05/27/2024
Docket/Case Number:	2020066382605



Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 05/27/2024

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

Sanctions Ordered: Censure
Monetary/Fine \$62,080.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$62,080 (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$350,000). THOSE MATTERS WERE BROUGHT BY FINRA, THE NEW YORK STOCK EXCHANGE, NYSE AMERICAN LLC, NYSE NATIONAL, INC., NYSE CHICAGO, INC., AND THE NASDAQ STOCK MARKET LLC.

Reporting Source: Firm

Current Status: Final

Allegations: NYSE ARCA, INC. (NYSE ARCA) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) SUBMITTED UNTIMELY AND INACCURATE NOTIFICATIONS TO NYSE ARCA IN CONNECTION WITH ITS DISTRIBUTIONS OF SECURITIES SUBJECT TO REGULATION M FROM AUGUST 2019 TO AUGUST 2022, IN VIOLATION OF NYSE ARCA RULE 9.5190-E; AND FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH NYSE ARCA RULE 9.5190-E FROM AUGUST 2019 TO MARCH 2024, IN VIOLATION OF NYSE ARCA RULE 11.18.

Initiated By: NYSE ARCA, INC

Date Initiated: 05/27/2024

Docket/Case Number: NO. 2020066382605



Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	05/27/2024
Sanctions Ordered:	Censure Monetary/Fine \$62,080.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$62,080. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH FINRA, THE NEW YORK STOCK EXCHANGE LLC, NYSE AMERICAN LLC, NYSE NATIONAL, INC., NYSE CHICAGO, INC., AND THE NASDAQ STOCK MARKET LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$62,080. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH FINRA, THE NEW YORK STOCK EXCHANGE LLC, NYSE AMERICAN LLC, NYSE NATIONAL, INC., NYSE CHICAGO, INC., AND THE NASDAQ STOCK MARKET LLC.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FILED UNTIMELY AND INACCURATE RESTRICTED PERIOD AND TRADING NOTIFICATIONS WITH FINRA. THE FINDINGS STATED THAT THE INACCURATE NOTIFICATIONS EITHER FAILED TO IDENTIFY ALL THE DISTRIBUTION PARTICIPANTS IN THE DISTRIBUTIONS OR FAILED TO PROPERLY IDENTIFY DISTRIBUTION PARTICIPANTS AS FINRA MEMBERS. IN ADDITION, THE FIRM SUBMITTED RESTRICTED PERIOD NOTIFICATIONS WITHOUT VERIFYING THAT THE LIST OF FINAL PARTICIPANTS WAS



CORRECT, AND FAILED TO FILE AMENDED NOTIFICATIONS WHEN DISTRIBUTION PARTICIPANTS JOINED AFTER AN INITIAL RESTRICTED PERIOD NOTIFICATION WAS FILED, INSTEAD, SUPPLYING THE LIST OF FINAL PARTICIPANTS IN THE TRADING NOTIFICATION. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WSPS, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH FINRA RULE 5190 NOTIFICATIONS WITH RESPECT TO THE TIMELINESS AND ACCURACY OF THOSE NOTIFICATIONS. THE FIRM LACKED A REASONABLE SUPERVISORY SYSTEM TO ENSURE THAT RESTRICTED PERIOD NOTIFICATIONS WERE TIMELY FILED FOR CERTAIN DISTRIBUTIONS WITH MARKETING PERIODS SHORTER THAN THE LENGTH OF THE APPLICABLE RESTRICTED PERIODS AND INSTEAD RELIED ON INTERNAL "LAUNCH EMAILS" USED TO INITIATE THE MARKETING OF THE DISTRIBUTION, TO DETERMINE WHEN TO FILE THE RESTRICTED PERIOD NOTIFICATION. IN ADDITION, THE FIRM'S WSPS DID NOT PROVIDE SUFFICIENT GUIDANCE ON WHEN THE NOTIFICATIONS NEEDED TO BE SUBMITTED OR HOW THE NOTIFICATIONS SHOULD HAVE BEEN REVIEWED. THE FIRM LACKED ANY SUPERVISORY SYSTEM TO REVIEW THE ACCURACY OF THE NOTIFICATIONS, INCLUDING ANY SYSTEM FOR REVIEWING WHETHER DISTRIBUTION PARTICIPANTS WERE FINRA MEMBERS. THE FIRM ALSO LACKED REASONABLE SYSTEMS AND PROCEDURES, INCLUDING WSPS, TO VERIFY THAT IT FILED AMENDED RESTRICTED PERIOD NOTIFICATIONS REFLECTING THE ADDITION OF DISTRIBUTION PARTICIPANTS AFTER THE INITIAL RESTRICTED PERIOD NOTIFICATIONS WERE FILED. AS A RESULT, CERTAIN OF THE FIRM'S RESTRICTED PERIOD NOTIFICATIONS DID NOT ACCURATELY REFLECT ALL DISTRIBUTION PARTICIPANTS.

Initiated By: FINRA

Date Initiated: 05/28/2024

Docket/Case Number: [2020066382601](#)

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 05/28/2024



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

Sanctions Ordered: Censure
Monetary/Fine \$90,080.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$90,080. FINE PAID IN FULL ON JUNE 14, 2024.

Reporting Source: Firm

Current Status: Final

Allegations: THE FINANCIAL INDUSTRY REGULATORY AUTHORITY (FINRA) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) FILED UNTIMELY OR INACCURATE NOTIFICATIONS WITH FINRA IN CONNECTION ITS PARTICIPATION IN CERTAIN SECURITY DISTRIBUTIONS SUBJECT TO REGULATION M FROM AUGUST 2019 TO AUGUST 2022, IN VIOLATION OF FINRA RULES 5190 AND 2010; AND FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH FINRA RULE 5190 FROM AUGUST 2019 TO MARCH 2024, IN VIOLATION OF FINRA RULES 3110(A), 3110(B), AND 2010.

Initiated By: FINANCIAL INDUSTRY REGULATORY AUTHORITY

Date Initiated: 05/28/2024

Docket/Case Number: NO. 2020066382601

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 05/28/2024

Sanctions Ordered: Censure
Monetary/Fine \$90,080.00



Other Sanctions Ordered:

Sanction Details:

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$90,080. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH THE NEW YORK STOCK EXCHANGE LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., NYSE NATIONAL, INC., NYSE CHICAGO, INC., AND THE NASDAQ STOCK MARKET LLC.

Firm Statement

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$90,080. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH THE NEW YORK STOCK EXCHANGE LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., NYSE NATIONAL, INC., NYSE CHICAGO, INC., AND THE NASDAQ STOCK MARKET LLC.

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Reporting Source:

Regulator

Current Status:

Final

Allegations:

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT VIOLATED NASDAQ RULE EQUITY 2, SEC. 10(E)(1) BY SUBMITTING UNTIMELY RESTRICTED PERIOD NOTIFICATIONS TO NASDAQ IN CONNECTION WITH ITS PARTICIPATION IN TWO SECURITY DISTRIBUTIONS SUBJECT TO REGULATION M UNDER THE SECURITIES EXCHANGE ACT OF 1934. THE FINDINGS STATED THAT THE FIRM VIOLATED NASDAQ RULE 3010(A) (ON OR BEFORE DECEMBER 6, 2019), AND NASDAQ GENERAL 9, SECTION 20(A) (AFTER DECEMBER 6, 2019) BY FAILING TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES (WSPS), REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH NASDAQ RULE EQUITY 2, SECTION 10(E), SPECIFICALLY WITH RESPECT TO THE TIMELINESS AND ACCURACY OF THE REQUIRED NOTIFICATIONS. THE FIRM LACKED A REASONABLE SUPERVISORY SYSTEM AND WSPS TO REVIEW THE TIMELINESS OF THE RESTRICTED PERIOD AND TRADING NOTIFICATIONS. FIRM SUPERVISORS DID NOT INDEPENDENTLY REVIEW RESTRICTED PERIOD OR TRADING NOTIFICATIONS ON A CONSISTENT BASIS TO VERIFY THAT THEY WERE TIMELY FILED. IN ADDITION, THE FIRM'S WSPS DID NOT REQUIRE THAT THE NOTIFICATIONS BE REVIEWED FOR ACCURACY. THE FIRM LACKED ANY SUPERVISORY SYSTEM TO REVIEW THE ACCURACY OF THESE NOTIFICATIONS, INCLUDING ANY SYSTEM FOR REVIEWING WHETHER THE CRD NUMBERS OF DISTRIBUTION PARTICIPANTS WERE PROPERLY



IDENTIFIED. FINALLY, THE FIRM LACKED A REASONABLE SUPERVISORY SYSTEM AND WSPS TO VERIFY THAT IT FILED AMENDED RESTRICTED PERIOD NOTIFICATIONS REFLECTING THE ADDITION OF DISTRIBUTION PARTICIPANTS AFTER THE INITIAL RESTRICTED PERIOD NOTIFICATIONS WERE FILED.

Initiated By: NASDAQ STOCK MARKET

Date Initiated: 05/28/2024

Docket/Case Number: 2020066382602

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 05/28/2024

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

Sanctions Ordered: Censure
Monetary/Fine \$10,840.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED IN THE AMOUNT OF \$10,840 (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$350,000). THOSE MATTERS WERE BROUGHT BY FINRA, THE NEW YORK STOCK EXCHANGE LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., NYSE NATIONAL, INC., NYSE CHICAGO, INC.

Reporting Source: Firm

Current Status: Final

Allegations: THE NASDAQ STOCK MARKET LLC (NASDAQ) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) SUBMITTED UNTIMELY RESTRICTED PERIOD NOTIFICATIONS TO NASDAQ IN CONNECTION WITH ITS PARTICIPTION IN



TWO SECURITY DISTRIBUTIONS SUBJECT TO REGULATION M FROM DECEMBER 2020 TO JANUARY 2021, IN VIOLATION OF NASDAQ RULE EQUITY 2, SECTION 10(E)(1) AND NASDAQ RULE GENERAL 9, SECTION 1(A); AND FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH NASDAQ RULE EQUITY 2, SECTION 10(E) FROM AUGUST 2019 TO MARCH 2024, IN VIOLATION OF NASDAQ RULES 3010(A) AND 2010A (FOR CONDUCT PRIOR TO DECEMBER 6, 2019) AND NASDAQ GENERAL RULE 9, SECTION 20(A) AND NASDAQ GENERAL RULE 9, SECTION 1(A) (FOR CONDUCT ON OR AFTER DECEMBER 6, 2019).

Initiated By: THE NASDAQ STOCK MARKET LLC

Date Initiated: 05/28/2024

Docket/Case Number: NO. 2020066382602

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 05/28/2024

Sanctions Ordered: Censure
Monetary/Fine \$10,840.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$10,840. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH FINRA, THE NEW YORK STOCK EXCHANGE LLC, NYSE ARCA, INC., NYSE NATIONAL, INC., NYSE CHICAGO, INC., AND NYSE AMERICAN LLC.

Firm Statement WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$10,840. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH FINRA, THE NEW YORK STOCK EXCHANGE LLC, NYSE ARCA, INC., NYSE NATIONAL, INC., NYSE CHICAGO, INC., AND NYSE AMERICAN LLC.



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Reporting Source:	Regulator
Current Status:	Final
Allegations:	BOFA SECURITIES INC. VIOLATED C2 RULES 15.1, 7.1, AND 8.2, AND CBOE RULE 7.1 AND 8.2 BY AND THROUGH C2 CHAPTER 7 AND 8, DURING THEIR RESPECTIVE DATES OF APPLICABILITY, AND SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-3 THEREUNDER, IN THAT THE FIRM FAILED TO MAINTAIN ACCURATE BOOKS AND RECORDS; BOFA ALSO VIOLATED C2 RULE 4.24 AND CBOE RULE 8.16 BY AND THROUGH CHAPTER 5 OF C2'S RULEBOOK, AND C2 RULE 8.16 DURING THEIR RESPECTIVE DATES OF APPLICABILITY IN THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN SUPERVISORY PROCEDURES AND A SUPERVISORY SYSTEM REASONABLY DESIGNED TO COMPLY WITH THE RECORDKEEPING PROVISIONS OF THE FEDERAL SECURITIES LAWS AND C2 RULES THAT REQUIRE FIRMS TO MAKE AND KEEP CURRENT ACCURATE ORDER TRANSMISSION TIMES.
Initiated By:	CBOE C2 EXCHANGE, INC.
Date Initiated:	04/17/2024
Docket/Case Number:	FILE NO. URE-96-02/STAR NO. 20200674856-05
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	04/26/2024
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$15,000.00

**Other Sanctions Ordered:****Sanction Details:** A CENSURE AND A MONETARY FINE IN THE AMOUNT OF \$15,000**Reporting Source:** Firm**Current Status:** Final

Allegations: CBOE C2 EXCHANGE, INC. (C2) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) DID NOT RECORD ACCURATE TRANSMISSION TIMES FOR CERTAIN MANUALLY ROUTED OPTIONS ORDERS EXECUTED ON C2 AND OTHER OPTIONS EXCHANGES FROM OCTOBER 2019 TO DECEMBER 2022, IN VIOLATION OF C2 RULES 15.1, 7.1 AND 8.2, AND CBOE EXCHANGE, INC. (CBOE) RULES 7.1 AND 8.2 BY AND THROUGH C2 CHAPTER 7 AND 8 DURING THEIR RESPECTIVE DATES OF APPLICABILITY, AND SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND RULE 17A-3 THEREUNDER; FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN SUPERVISORY PROCEDURES, AND A SUPERVISORY SYSTEM REASONABLY DESIGNED TO PREVENT AND DETECT VIOLATIONS OF SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-3 THEREUNDER AND C2 RULES FROM OCTOBER 2019 TO APRIL 2023, IN VIOLATION OF C2 RULES 4.24 AND CBOE RULE 8.16 BY AND THROUGH CHAPTER 5 OF C2'S RULEBOOK AND C2 RULE 8.16 DURING THEIR RESPECTIVE DATES OF APPLICABILITY.

Initiated By: CBOE C2 EXCHANGE, INC.**Date Initiated:** 04/26/2024**Docket/Case Number:** FILE NO. URE 96-02/STAR NO. 20200674856-05**Principal Product Type:** Options**Other Product Type(s):****Principal Sanction(s)/Relief Sought:** Censure**Other Sanction(s)/Relief Sought:****Resolution:** Consent**Resolution Date:** 04/26/2024**Sanctions Ordered:** Censure
Monetary/Fine \$15,000.00**Other Sanctions Ordered:**

**Sanction Details:**

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$15,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ GEMX, LLC, NASDAQ OPTIONS MARKET LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

Firm Statement

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$15,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ GEMX, LLC, NASDAQ OPTIONS MARKET LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

Disclosure 34 of 69**Reporting Source:**

Regulator

Current Status:

Final

Allegations:

BOFA SECURITIES, INC. VIOLATED CBOE RULES 15.1, 7.1, 4.2, AND 8.2, DURING THEIR RESPECTIVE DATES OF APPLICABILITY, AND SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-3 THEREUNDER IN THAT THE FIRM FAILED TO MAINTAIN ACCURATE BOOKS AND RECORDS; BOFA ALSO VIOLATED CBOE RULES 4.24 AND 8.16 DURING THEIR RESPECTIVE DATES OF APPLICABILITY AS THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN SUPERVISORY PROCEDURES AND A SUPERVISORY SYSTEM REASONABLY DESIGNED TO COMPLY WITH THE RECORDKEEPING PROVISIONS OF THE FEDERAL SECURITIES LAWS AND CBOE RULES THAT REQUIRE FIRMS TO MAKE AND KEEP CURRENT ACCURATE ORDER TRANSMISSION TIMES.

Initiated By:

CBOE EXCHANGE, INC.

Date Initiated:

04/17/2024

Docket/Case Number:

FILE NO. URE-96-01/STAR NO. 20200674856-03

Principal Product Type:

Options

**Other Product Type(s):**

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

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 04/26/2024

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

Sanctions Ordered: Censure
Monetary/Fine \$350,000.00

Other Sanctions Ordered:

Sanction Details: A CENSURE AND A MONETARY FINE IN THE AMOUNT OF \$350,000

Reporting Source: Firm

Current Status: Final

Allegations: CBOE EXCHANGE, INC. (CBOE) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) ROUTED CERTAIN OPTIONS ORDERS TO CBOE AND OTHER OPTIONS EXCHANGES THAT LACKED ORDER TRANSMISSION TIMES FROM OCTOBER 2012 TO OCTOBER 2019, AND DID NOT RECORD ACCURATE TRANSMISSION TIMES FOR OPTIONS ORDERS MANUALLY ROUTED TO CBOE FLOOR BROKERS OR OTHER THIRD-PARTY BROKERS FOR EXECUTION FROM OCTOBER 2019 TO DECEMBER 2022, IN VIOLATION OF CBOE RULES 15.1, RENUMBERED TO 7.1, AND 4.2, RENUMBERED TO 8.2, AND SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND RULE 17A-3 THEREUNDER; AND FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN SUPERVISORY PROCEDURES, AND A SUPERVISORY SYSTEM REASONABLY DESIGNED TO PREVENT AND DETECT VIOLATIONS OF SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-3 THEREUNDER AND APPLICABLE CBOE RULES FROM OCTOBER 2012 TO APRIL 2023, IN VIOLATION OF CBOE RULE 4.24, RENUMBERED AS 8.16.

Initiated By: CBOE EXCHANGE, INC.



Date Initiated:	04/26/2024
Docket/Case Number:	FILE NO. URE 96-01/STAR NO. 20200674856-03
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	04/26/2024
Sanctions Ordered:	Censure Monetary/Fine \$350,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$350,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ GEMX, LLC, NASDAQ OPTIONS MARKET LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$350,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ GEMX, LLC, NASDAQ OPTIONS MARKET LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

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Reporting Source:	Regulator
Current Status:	Final



Allegations:	BOFA SECURITIES, INC. VIOLATED EDGX RULE 5.1 IN THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN SUPERVISORY PROCEDURES AND A SUPERVISORY SYSTEM REASONABLY DESIGNED TO COMPLY WITH THE RECORDKEEPING PROVISIONS OF THE FEDERAL SECURITIES LAWS AND EDGX RULES THAT REQUIRE FIRMS TO MAKE AND KEEP CURRENT ACCURATE ORDER TRANSMISSION TIMES.
Initiated By:	CBOE EDGX EXCHANGE, INC.
Date Initiated:	04/17/2024
Docket/Case Number:	FILE NO. URE-96-04/STAR NO. 20200674856-06
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	04/26/2024
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$10,000.00
Other Sanctions Ordered:	
Sanction Details:	A CENSURE AND A MONETARY FINE IN THE AMOUNT OF \$10,000.
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Reporting Source:	Firm
Current Status:	Final
Allegations:	CBOE EDGX EXCHANGE, INC. (EDGX) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN SUPERVISORY PROCEDURES, AND A SUPERVISORY SYSTEM TO PREVENT AND DETECT VIOLATIONS OF SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND RULE 17A-3 THEREUNDER AND EDGX RULES RELATED TO CAPTURING TRANSMISSION



TIMES FOR MANUALLY-ROUTED OPTIONS ORDERS FROM OCTOBER 2019 TO APRIL 2023, IN VIOLATION OF EDGX RULE 5.1.

Initiated By:	CBOE EDGX EXCHANGE, INC.
Date Initiated:	04/26/2024
Docket/Case Number:	FILE NO. URE 96-04/STAR NO. 20200674856-06
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	04/26/2024
Sanctions Ordered:	Censure Monetary/Fine \$10,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$10,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., NASDAQ GEMX, LLC, NASDAQ OPTIONS MARKET LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIA X EMERALD, LLC, MIA X PEARL, LLC, AND BOX EXCHANGE LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$10,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., NASDAQ GEMX, LLC, NASDAQ OPTIONS MARKET LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIA X EMERALD, LLC, MIA X PEARL, LLC, AND BOX EXCHANGE LLC.



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Reporting Source: Regulator

Current Status: Final

Allegations: BOFA SECURITIES, INC. VIOLATED BZX RULES 24.1 AND 18.1, AND SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-3 THEREUNDER IN THAT THE FIRM FAILED TO MAINTAIN ACCURATE BOOKS AND RECORDS; VIOLATED BZX RULE 5.1 IN THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN SUPERVISORY PROCEDURES AND A SUPERVISORY SYSTEM REASONABLY DESIGNED TO COMPLY WITH THE RECORDKEEPING PROVISIONS OF THE FEDERAL SECURITIES LAWS AND BZX RULES THAT REQUIRE FIRMS TO MAKE AND KEEP CURRENT ACCURATE ORDER TRANSMISSION TIMES.

Initiated By: CBOE BZX EXCHANGE, INC.

Date Initiated: 04/17/2024

Docket/Case Number: FILE NO. URE-96-03/STAR NO. 20200674856-04

Principal Product Type: Options

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 04/26/2024

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

Sanctions Ordered: Censure
Monetary/Fine \$30,000.00

Other Sanctions Ordered:

Sanction Details: A CENSURE AND A MONETARY FINE IN THE AMOUNT OF \$30,000.

Reporting Source: Firm



Current Status:	Final
Allegations:	CBOE BZX EXCHANGE, INC. (BZX) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) MANUALLY ROUTED CERTAIN OPTIONS ORDERS TO BZX AND OTHER EXCHANGES THAT LACKED ORDER TRANSMISSION TIMES FROM OCTOBER 2012 TO OCTOBER 2019 AND DID NOT ACCURATELY RECORD TRANSMISSION TIMES FOR OPTIONS ORDERS MANUALLY ROUTED TO A FLOOR BROKER OR OTHER-PARTY BROKERS FOR EXECUTION, FROM OCTOBER 2019 TO DECEMBER 2022, IN VIOLATION OF BZX RULES 24.1 AND 18.1 AND SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND RULE 17A-3 THEREUNDER; AND FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN SUPERVISORY PROCEDURES, AND A SUPERVISORY SYSTEM REASONABLY DESIGNED TO COMPLY WITH THE RECORDKEEPING PROVISIONS OF THE FEDERAL SECURITIES LAWS AND APPLICABLE BZX RULES FROM OCTOBER 2012 TO APRIL 2023, IN VIOLATION OF BZX RULE 5.1.
Initiated By:	CBOE BZX EXCHANGE, INC.
Date Initiated:	04/26/2024
Docket/Case Number:	FILE NO. URE 96-03/STAR NO. 20200674856-04
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	04/26/2024
Sanctions Ordered:	Censure Monetary/Fine \$30,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$30,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ GEMX, LLC, NASDAQ OPTIONS MARKET LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND



BOX EXCHANGE LLC.

Firm Statement

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$30,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE LETTER OF CONSENT. THE LETTER OF CONSENT WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ GEMX, LLC, NASDAQ OPTIONS MARKET LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

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Reporting Source: Regulator

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO ACCURATELY RECORD TRANSMISSION TIMES FOR OPTIONS ORDERS MANUALLY ROUTED TO FLOOR BROKERS OR OTHER THIRD-PARTY BROKERS FOR EXECUTION. INSTEAD OF RECORDING THE TIME THAT THE FIRM TRANSMITTED THE ORDER FOR EXECUTION AS THE TRANSMISSION TIME, THE FIRM RECORDED THE TIME THAT THE BROKER TO WHICH AN ORDER WAS ROUTED ACKNOWLEDGED THE ORDER TO THE FIRM. THIS ACKNOWLEDGMENT TIME, HOWEVER, DID NOT ACCURATELY REFLECT THE ACTUAL TRANSMISSION TIME. THE FIRM MAINTAINED AN INACCURATE TRANSMISSION TIME FOR AN ESTIMATED 76,820 MANUALLY-ROUTED OPTIONS ORDERS EXECUTED ON GEMX AND OTHER OPTIONS EXCHANGES. OF THOSE 76,820 ORDERS, APPROXIMATELY .59 PERCENT WERE EXECUTED ON GEMX. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN SUPERVISORY PROCEDURES, AND A SYSTEM FOR APPLYING SUCH PROCEDURES, REASONABLY DESIGNED TO PREVENT AND DETECT VIOLATIONS OF GEMX RULE OPTIONS 6E, SECTION 1, AND EXCHANGE ACT § 17(A) AND RULE 17A-3 THEREUNDER INsofar AS THE FIRM DID NOT IMPLEMENT A SUPERVISORY SYSTEM AND PROCEDURES DESIGNED TO CHECK THE ACCURACY OF ORDER TRANSMISSION TIMES UNTIL MAY 2023.

Initiated By: NASDAQ GEMX, LLC

Date Initiated: 04/29/2024

Docket/Case Number: 2020067485608

Principal Product Type: Options

**Other Product Type(s):****Principal Sanction(s)/Relief Sought:****Other Sanction(s)/Relief Sought:****Resolution:** Acceptance, Waiver & Consent(AWC)**Resolution Date:** 04/29/2024**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?** No**Sanctions Ordered:** Censure
Monetary/Fine \$19,200.00**Other Sanctions Ordered:****Sanction Details:** THE FIRM WAS CENSURED AND FINED \$19,200. THIS MATTER WAS SETTLED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$725,000. THE REMAINDER OF THE FINE WILL BE ALLOCATED TO CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., THE NASDAQ OPTIONS MARKET LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.**Reporting Source:** Firm**Current Status:** Final**Allegations:** NASDAQ GEMX, LLC (GEMX) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) DID NOT ACCURATELY RECORD TRANSMISSION TIMES FOR CERTAIN MANUAL OPTIONS ORDERS ROUTED TO VARIOUS OPTIONS EXCHANGES, INCLUDING GEMX, FROM OCTOBER 2019 TO DECEMBER 2022, IN VIOLATION OF GEMX RULE OPTIONS 6E, SECTION 1 AND SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND RULE 17A-3 THEREUNDER; AND FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN PROCEDURES, AND A SYSTEM FOR APPLYING SUCH PROCEDURES, TO ENSURE THE ACCURATE RECORDING OF ORDER TRANSMISSION TIMES FROM OCTOBER 2019 TO APRIL 2023, IN VIOLATION OF GEMX RULE OPTIONS 9, SECTIONS 1 AND 2.



Initiated By:	NASDAQ GEMX, LLC
Date Initiated:	04/29/2024
Docket/Case Number:	NO. 2020067485608
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	04/29/2024
Sanctions Ordered:	Censure Monetary/Fine \$19,200.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$19,200. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ OPTIONS MARKET LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$19,200. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ OPTIONS MARKET LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

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Reporting Source:	Regulator
Current Status:	Final



Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT DID NOT HAVE A SYSTEM TO RECORD THE TRANSMISSION TIMES OF OPTIONS ORDERS THAT TRADERS MANUALLY ROUTED TO A FLOOR BROKER OR TO A THIRD-PARTY BROKER FOR EXECUTION. THUS, THE FIRM MANUALLY ROUTED AN ESTIMATED 120,960 OPTIONS ORDERS TO NOM AND OTHER OPTIONS EXCHANGES THAT LACKED ORDER TRANSMISSION TIMES. OF THESE 120,960 ORDERS, APPROXIMATELY 1.9 PERCENT WERE EXECUTED ON NOM. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN SUPERVISORY PROCEDURES, AND A SYSTEM FOR APPLYING SUCH PROCEDURES, REASONABLY DESIGNED TO PREVENT AND DETECT VIOLATIONS OF NOM RULE CHAPTER IX, SECTION 1, AND SUBSEQUENTLY OPTIONS 6E, SECTION 1, AND EXCHANGE ACT § 17(A) AND RULE 17A-3 THEREUNDER INsofar AS THE FIRM DID NOT ESTABLISH OR IMPLEMENT SUPERVISORY SYSTEMS OR PROCEDURES DESIGNED TO CHECK THE ACCURACY OF ORDER TRANSMISSION TIMES TO ACHIEVE COMPLIANCE WITH RECORDKEEPING PROVISIONS OF THE FEDERAL SECURITIES LAWS AND NOM RULES UNTIL MAY 2023.
Initiated By:	NASDAQ STOCK MARKET
Date Initiated:	04/29/2024
Docket/Case Number:	2020067485601
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	04/29/2024
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$23,980.00
Other Sanctions Ordered:	

**Sanction Details:**

THE FIRM WAS CENSURED AND FINED \$23,980. THIS MATTER WAS SETTLED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$725,000. THE REMAINDER OF THE FINE SHALL BE ALLOCATED TO CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ PHLX LLC, NASDAQ GEMX, LLC, NASDAQ ISE, LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

Reporting Source:

Firm

Current Status:

Final

Allegations:

NASDAQ OPTIONS MARKET LLC (NOM) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) ROUTED CERTAIN MANUAL OPTIONS ORDERS TO NOM AND OTHER EXCHANGES THAT LACKED ORDER TRANSMISSION TIMES FROM OCTOBER 2012 TO OCTOBER 2019, IN VIOLATION OF NOM RULE CHAPTER IX, SECTION 1 AND SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND RULE 17A-3 THEREUNDER; AND FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN SUPERVISORY PROCEDURES, AND A SYSTEM FOR APPLYING SUCH PROCEDURES, TO ENSURE THE ACCURATE RECORDING OF ORDER TRANSMISSION TIMES FROM OCTOBER 2012 TO APRIL 2023, IN VIOLATION OF NOM RULE CHAPTER III, SECTION 1, AND SUBSEQUENTLY OPTIONS 9, SECTION 2, NOM RULE CHAPTER III, SECTION 2, AND SUBSEQUENTLY OPTIONS 9, SECTION 2(B)(1), NASDAQ RULE 3010, AND SUBSEQUENTLY GENERAL 9, SECTION 20, AND NASDAQ RULES 2110 AND 2010A, AND SUBSEQUENTLY GENERAL 9, SECTION 1(A).

Initiated By:

NASDAQ OPTIONS MARKET LLC

Date Initiated:

04/29/2024

Docket/Case Number:

NO. 2020067485601

Principal Product Type:

Options

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

Censure

Other Sanction(s)/Relief Sought:**Resolution:**

Acceptance, Waiver & Consent(AWC)

Resolution Date:

04/29/2024



Sanctions Ordered: Censure
Monetary/Fine \$23,980.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$23,980. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ PHLX LLC, NASDAQ GEMX, LLC, NASDAQ ISE, LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAx EMERALD, LLC, MIAx PEARL, LLC, AND BOX EXCHANGE LLC.

Firm Statement WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$23,980. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ PHLX LLC, NASDAQ GEMX, LLC, NASDAQ ISE, LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAx EMERALD, LLC, MIAx PEARL, LLC, AND BOX EXCHANGE LLC.

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Reporting Source: Regulator

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT DID NOT HAVE A SYSTEM TO RECORD THE TRANSMISSION TIMES OF OPTIONS ORDERS THAT TRADERS MANUALLY ROUTED TO A FLOOR BROKER OR TO A THIRD-PARTY BROKER FOR EXECUTION. THUS, THE FIRM MANUALLY ROUTED AN ESTIMATED 120,960 OPTIONS ORDERS TO PHLX AND OTHER OPTIONS EXCHANGES THAT LACKED ORDER TRANSMISSION TIMES. OF THESE 120,960 ORDERS, APPROXIMATELY 18.6 PERCENT WERE EXECUTED ON PHLX. THE FIRM FAILED TO ACCURATELY RECORD TRANSMISSION TIMES FOR OPTIONS ORDERS MANUALLY ROUTED TO PHLX FLOOR BROKERS OR OTHER THIRD-PARTY BROKERS FOR EXECUTION. INSTEAD OF RECORDING THE TIME THAT THE FIRM TRANSMITTED THE ORDER FOR EXECUTION AS THE TRANSMISSION TIME, THE FIRM RECORDED THE TIME THAT THE BROKER TO WHICH AN ORDER WAS ROUTED ACKNOWLEDGED THE ORDER TO THE FIRM. THIS ACKNOWLEDGMENT TIME, HOWEVER, DID NOT ACCURATELY REFLECT



THE ACTUAL TRANSMISSION TIME. DURING THAT PERIOD, THE FIRM MAINTAINED AN INACCURATE TRANSMISSION TIME FOR AN ESTIMATED 76,820 MANUALLY-ROUTED OPTIONS ORDERS TO PHLX AND OTHER OPTIONS EXCHANGES. OF THOSE 76,820 ORDERS, APPROXIMATELY 10.4 PERCENT WERE EXECUTED ON PHLX. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN SUPERVISORY PROCEDURES, AND A SYSTEM FOR APPLYING SUCH PROCEDURES, REASONABLY DESIGNED TO PREVENT AND DETECT VIOLATIONS OF PHLX RULE 760, AND SUBSEQUENTLY OPTIONS 6E, SECTION 1, AND EXCHANGE ACT § 17(A) AND RULE 17A-3 THEREUNDER INsofar AS THE FIRM DID NOT ESTABLISH OR IMPLEMENT SUPERVISORY SYSTEMS OR PROCEDURES DESIGNED TO CHECK THE ACCURACY OF ORDER TRANSMISSION TIMES UNTIL MAY 2023.

Initiated By: NASDAQ PHLX LLC

Date Initiated: 04/29/2024

Docket/Case Number: 2020067485602

Principal Product Type: Options

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 04/29/2024

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

Sanctions Ordered: Censure
Monetary/Fine \$100,300.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$100,300. THIS MATTER WAS SETTLED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$725,000. THE REMAINDER OF THE FINE SHALL BE ALLOCATED TO CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., THE NASDAQ OPTIONS MARKET LLC,



NASDAQ GEMX, LLC, NASDAQ ISE, LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

Reporting Source: Firm

Current Status: Final

Allegations: NASDAQ PHLX LLC (PHLX) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) ROUTED CERTAIN MANUAL OPTIONS ORDERS TO PHLX AND OTHER EXCHANGES THAT LACKED ORDER TRANSMISSION TIMES FROM OCTOBER 2012 TO OCTOBER 2019 AND DID NOT RECORD ACCURATE TRANSMISSION TIMES FOR CERTAIN MANUALLY ROUTED OPTIONS ORDERS EXECUTED ON PHLX AND OTHER OPTIONS EXCHANGES FROM OCTOBER 2019 TO DECEMBER 2022, IN VIOLATION OF PHLX RULES 760 AND OPTIONS 6E, SECTION 1 AND SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND RULE 17A-3 THEREUNDER; AND FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN PROCEDURES, AND A SYSTEM FOR APPLYING SUCH PROCEDURES, TO ENSURE THE ACCURATE RECORDING OF ORDER TRANSMISSION TIMES FROM OCTOBER 2012 TO APRIL 2023, IN VIOLATION OF PHLX RULE 748, SUBSEQUENTLY GENERAL 9, SECTION 20, AND PHLX RULE 707, SUBSEQUENTLY OPTIONS 9, SECTION 1 AND GENERAL 9, SECTION 1(C).

Initiated By: NASDAQ PHLX LLC

Date Initiated: 04/29/2024

Docket/Case Number: NO. 2020067485602

Principal Product Type: Options

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 04/29/2024

Sanctions Ordered: Censure
Monetary/Fine \$100,300.00

Other Sanctions Ordered:

**Sanction Details:**

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$100,300. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ OPTIONS MARKET LLC, NASDAQ GEMX, LLC, NASDAQ ISE, LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

Firm Statement

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$100,300. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ OPTIONS MARKET LLC, NASDAQ GEMX, LLC, NASDAQ ISE, LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

Disclosure 40 of 69**Reporting Source:**

Regulator

Current Status:

Final

Allegations:

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO ACCURATELY RECORD TRANSMISSION TIMES FOR OPTIONS ORDERS MANUALLY ROUTED TO FLOOR BROKERS OR THIRD-PARTY BROKERS FOR EXECUTION. INSTEAD OF RECORDING THE TIME THAT THE FIRM TRANSMITTED THE ORDER FOR EXECUTION AS THE TRANSMISSION TIME, THE FIRM RECORDED THE TIME THAT THE BROKER TO WHICH AN ORDER WAS ROUTED ACKNOWLEDGED THE ORDER TO THE FIRM. THIS ACKNOWLEDGMENT TIME, HOWEVER, DID NOT ACCURATELY REFLECT THE ACTUAL TRANSMISSION TIME. THE FIRM MAINTAINED AN INACCURATE TRANSMISSION TIME FOR AN ESTIMATED 76,820 MANUALLY-ROUTED OPTIONS ORDERS EXECUTED ON ISE AND OTHER OPTIONS EXCHANGES. OF THOSE 76,820 ORDERS, APPROXIMATELY FIVE PERCENT WERE EXECUTED ON ISE. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN SUPERVISORY PROCEDURES, AND A SYSTEM FOR APPLYING SUCH PROCEDURES, REASONABLY DESIGNED TO PREVENT AND DETECT VIOLATIONS OF ISE RULE OPTIONS 6E, SECTION 1, AND EXCHANGE ACT § 17(A) AND RULE 17A-3 THEREUNDER INsofar AS THE FIRM DID NOT IMPLEMENT A SUPERVISORY SYSTEM AND PROCEDURES DESIGNED TO CHECK THE



ACCURACY OF ORDER TRANSMISSION TIMES UNTIL MAY 2023.

Initiated By: NASDAQ ISE, LLC

Date Initiated: 04/29/2024

Docket/Case Number: 2020067485607

Principal Product Type: Options

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 04/29/2024

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

Sanctions Ordered: Censure
Monetary/Fine \$29,140.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$29,140. THIS MATTER WAS SETTLED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$725,000. THE REMAINDER OF THE FINE SHALL BE ALLOCATED TO CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., THE NASDAQ OPTIONS MARKET LLC, NASDAQ GEMX, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

Reporting Source: Firm

Current Status: Final

Allegations: NASDAQ ISE, LLC (ISE) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) DID NOT RECORD ACCURATE TRANSMISSION TIMES FOR CERTAIN MANUAL OPTIONS ORDERS ROUTED TO VARIOUS OPTIONS EXCHANGES, INCLUDING ISE, FROM OCTOBER 2019 TO DECEMBER 2022, IN VIOLATION



OF ISE RULE OPTIONS 6E, SECTION 1 AND SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND RULE 17A-3 THEREUNDER; AND FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN PROCEDURES, AND A SYSTEM FOR APPLYING SUCH PROCEDURES, TO ENSURE THE ACCURATE RECORDING OF ORDER TRANSMISSION TIMES FROM OCTOBER 2019 TO APRIL 2023, IN VIOLATION OF ISE RULE OPTION 9, SECTIONS 1 AND 2.

Initiated By:	NASDAQ ISE, LLC
Date Initiated:	04/29/2024
Docket/Case Number:	NO. 2020067485607
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	04/29/2024
Sanctions Ordered:	Censure Monetary/Fine \$29,140.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$29,140. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ OPTIONS MARKET LLC, NASDAQ GEMX, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$29,140. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ OPTIONS MARKET LLC, NASDAQ GEMX, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE,



LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	<p>WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO ACCURATELY RECORD TRANSMISSION TIMES FOR OPTIONS ORDERS MANUALLY ROUTED TO NYSE ARCA FLOOR BROKERS OR OTHER THIRD-PARTY BROKERS FOR EXECUTION. INSTEAD OF RECORDING THE TIME THAT THE FIRM TRANSMITTED THE ORDER FOR EXECUTION AS THE TRANSMISSION TIME, THE FIRM INSTEAD RECORDED THE TIME THAT THE BROKER TO WHICH AN ORDER WAS ROUTED ACKNOWLEDGED THE ORDER TO THE FIRM. THIS ACKNOWLEDGMENT TIME, HOWEVER, DID NOT ACCURATELY REFLECT THE ACTUAL TRANSMISSION TIME. THE FIRM MAINTAINED AN INACCURATE TRANSMISSION TIME FOR AN ESTIMATED 76,820 MANUALLY-ROUTED OPTIONS ORDERS EXECUTED ON NYSE ARCA AND OTHER OPTIONS EXCHANGES. THE FINDINGS ALSO STATED THAT THE FIRM DID NOT HAVE A SYSTEM TO CAPTURE THE ACCURATE TRANSMISSION TIMES. ADDITIONALLY, THE FIRM DID NOT IMPLEMENT A SUPERVISORY SYSTEM AND WRITTEN SUPERVISORY PROCEDURES REASONABLY DESIGNED TO CHECK THE ACCURACY OF ORDER TRANSMISSION TIMES TO ENSURE COMPLIANCE WITH RECORDKEEPING PROVISIONS OF THE FEDERAL SECURITIES LAWS AND NYSE ARCA RULES UNTIL MAY 2023.</p>
Initiated By:	NYSE ARCA, INC.
Date Initiated:	04/29/2024
Docket/Case Number:	2020067485610
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	04/29/2024



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?

No

Sanctions Ordered:

Censure

Monetary/Fine \$28,900.00

Other Sanctions Ordered:

Sanction Details:

THE FIRM WAS CENSURED AND FINED \$28,900. THIS MATTER WAS RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$725,000 BROUGHT BY NYSE AMERICAN LLC, CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ PHLX LLC, THE NASDAQ OPTIONS MARKET LLC, NASDAQ GEMX, LLC, NASDAQ ISE, LLC, MIAMI INTERNATIONAL SECURITIES EXCHANGE, MIAx EMERALD, LLC, MIAx PEARL, LLC, AND BOX EXCHANGE LLC.

Reporting Source:

Firm

Current Status:

Final

Allegations:

NYSE ARCA, INC. (NYSE ARCA) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) DID NOT RECORD ACCURATE TRANSMISSION TIMES FOR OPTIONS ORDERS MANUALLY ROUTED TO NYSE ARCA FLOOR BROKERS OR OTHER THIRD-PARTY BROKERS FOR EXECUTION FROM OCTOBER 2019 TO DECEMBER 2022, IN VIOLATION OF NYSE ARCA RULES 6.68-O AND 11.16 AND SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND RULE 17A-3 THEREUNDER; AND FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH NYSE ARCA RULES AND FEDERAL SECURITIES LAWS RELATED TO RECORDKEEPING FROM OCTOBER 2019 TO APRIL 2023, IN VIOLATION OF NYSE ARCA RULES 11.18(B) AND 11.18(C).

Initiated By:

NYSE ARCA, INC.

Date Initiated:

04/29/2024

Docket/Case Number:

NO. 2020067485610

Principal Product Type:

Options

Other Product Type(s):



Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	04/29/2024
Sanctions Ordered:	Censure Monetary/Fine \$28,900.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$28,900. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ GEMX, LLC, NASDAQ OPTIONS MARKET LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$28,900. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ GEMX, LLC, NASDAQ OPTIONS MARKET LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE AMERICAN LLC, MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO ACCURATELY RECORD TRANSMISSION TIMES FOR OPTIONS ORDERS MANUALLY ROUTED TO NYSE AMERICAN FLOOR BROKERS OR OTHER THIRD-PARTY BROKERS FOR EXECUTION. INSTEAD OF RECORDING THE TIME THAT THE FIRM TRANSMITTED THE ORDER FOR EXECUTION AS THE TRANSMISSION TIME, THE FIRM INSTEAD RECORDED THE TIME THAT THE BROKER TO WHICH AN ORDER WAS ROUTED ACKNOWLEDGED THE



ORDER TO THE FIRM. THIS ACKNOWLEDGMENT TIME, HOWEVER, DID NOT ACCURATELY REFLECT THE ACTUAL TRANSMISSION TIME. THE FIRM MAINTAINED AN INACCURATE TRANSMISSION TIME FOR AN ESTIMATED 76,820 MANUALLY-ROUTED OPTIONS ORDERS EXECUTED ON NYSE AMERICAN AND OTHER OPTIONS EXCHANGES. THE FINDINGS ALSO STATED THAT THE FIRM DID NOT HAVE A SYSTEM TO CAPTURE THE ACCURATE TRANSMISSION TIMES. ADDITIONALLY, THE FIRM DID NOT IMPLEMENT A SUPERVISORY SYSTEM AND WRITTEN SUPERVISORY PROCEDURES REASONABLY DESIGNED TO CHECK THE ACCURACY OF ORDER TRANSMISSION TIMES TO ACHIEVE COMPLIANCE WITH RECORDKEEPING PROVISIONS OF THE FEDERAL SECURITIES LAWS AND NYSE AMERICAN RULES UNTIL MAY 2023.

Initiated By: NYSE AMERICAN LLC

Date Initiated: 04/29/2024

Docket/Case Number: 2020067485609

Principal Product Type: Options

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 04/29/2024

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

Sanctions Ordered: Censure
Monetary/Fine \$27,900.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$27,900. THIS MATTER WAS RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$725,000 BROUGHT BY NYSE ARCA, INC., CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ PHLX LLC, THE NASDAQ OPTIONS MARKET LLC, NASDAQ GEMX, LLC, NASDAQ ISE, LLC, MIAMI INTERNATIONAL SECURITIES



EXCHANGE, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

Reporting Source:	Firm
Current Status:	Final
Allegations:	NYSE AMERICAN LLC (NYSE AMERICAN) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) DID NOT RECORD ACCURATE TRANSMISSION TIMES FOR OPTIONS ORDERS MANUALLY ROUTED TO NYSE AMERICAN FLOOR BROKERS OR OTHER THIRD-PARTY BROKERS FOR EXECUTION FROM OCTOBER 2019 TO DECEMBER 2022, IN VIOLATION OF NYSE AMERICAN RULES 956NY AND 324, AND SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND RULE 17A-3 THEREUNDER; AND FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH NYSE ARCA RULES AND FEDERAL SECURITIES LAWS RELATED TO RECORDKEEPING FROM OCTOBER 2019 TO APRIL 2023, IN VIOLATION OF NYSE AMERICAN RULE 320(E).
Initiated By:	NYSE AMERICAN LLC
Date Initiated:	04/29/2024
Docket/Case Number:	NO. 2020067485609
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	04/29/2024
Sanctions Ordered:	Censure Monetary/Fine \$27,900.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$27,900. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE



BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ GEMX, LLC, NASDAQ OPTIONS MARKET LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

Firm Statement

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$27,900. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH CBOE EXCHANGE, INC., CBOE C2 EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., NASDAQ GEMX, LLC, NASDAQ OPTIONS MARKET LLC, NASDAQ ISE, LLC, NASDAQ PHLX LLC, NYSE ARCA, INC., MIAMI INTERNATIONAL SECURITIES EXCHANGE, LLC, MIAX EMERALD, LLC, MIAX PEARL, LLC, AND BOX EXCHANGE LLC.

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Reporting Source: Regulator

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT, THROUGH A FORMER SUPERVISOR AND A FORMER JUNIOR TRADER ACTING SEPARATELY, ENGAGED IN 717 INSTANCES OF SPOOFING IN U.S. TREASURY SECURITIES. THE FINDINGS STATED THAT THIS TRADING ACTIVITY OCCURRED ON THE SECONDARY MARKET, WHERE INSTITUTIONAL AND OTHER MARKET PARTICIPANTS TRADE U.S. TREASURY SECURITIES THROUGH ELECTRONIC TRADING PLATFORMS. THE SUPERVISOR ENGAGED IN 523 INSTANCES OF SPOOFING, FIRST AS HEAD OF THE FIRM'S U.S. TREASURY DESK AND THEN AS HEAD OF THE FIRM'S AMERICAS LINEAR RATES BUSINESS. IN THE LATTER ROLE, THE SUPERVISOR OVERSAW MULTIPLE DESKS, INCLUDING THE U.S. TREASURY DESK. SEPARATELY, THE JUNIOR TRADER ENGAGED IN 194 INSTANCES OF SPOOFING. AFTER THE FIRM BECAME AWARE OF APPROXIMATELY 20 INSTANCES OF POTENTIAL SPOOFING BY THE JUNIOR TRADER, IT TERMINATED HIM. THE SUPERVISOR WHO ENGAGED IN SPOOFING WAS THE JUNIOR TRADER'S SECOND-LEVEL SUPERVISOR. THE INSTANCES OF SPOOFING ARE COMPRISED OF 525 INSTANCES OF SPOOFING IN A U.S. TREASURY SECURITY TO INDUCE OPPOSITE-SIDE EXECUTIONS IN THE SAME SECURITY, AND 192 INSTANCES OF CROSS-PRODUCT SPOOFING IN A U.S. TREASURY SECURITY TO INDUCE OPPOSITE-SIDE EXECUTIONS IN A CORRELATED U.S. TREASURY FUTURES CONTRACT. THE SPOOFING BY BOTH OF THE TRADERS GENERALLY FOLLOWED THE SAME PATTERN. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM



REASONABLY DESIGNED TO DETECT SPOOFING. THE FIRM DID NOT HAVE A SUPERVISORY SYSTEM TO DETECT SPOOFING IN THE U.S. TREASURY MARKETS UNTIL NOVEMBER 2015. THEREAFTER, UNTIL MID-2019, THE FIRM'S SURVEILLANCE WAS DESIGNED TO DETECT SPOOFING BY TRADING ALGORITHMS, NOT MANUAL SPOOFING BY ITS TRADERS. IN ADDITION, UNTIL AT LEAST DECEMBER 2020, THE FIRM'S SURVEILLANCE DID NOT CAPTURE ORDERS ITS TRADERS ENTERED INTO UP TO EIGHT TRADING SYSTEMS PROVIDED BY EXTERNAL VENUES. THE FIRM ALSO DID NOT SUPERVISE FOR POTENTIAL CROSS-PRODUCT SPOOFING IN THE U.S. TREASURY MARKETS. IN ADDITION TO THE INSTANCES OF SPOOFING BY THE TWO FORMER TRADERS, FINRA'S ANALYSIS OF THE FIRM'S TRADING IDENTIFIED ALMOST 280 ADDITIONAL INSTANCES OF TRADING ACTIVITY IN U.S. TREASURY SECURITIES THAT BORE SOME INDICIA OF POTENTIAL SPOOFING. DUE TO THESE SUPERVISORY DEFICIENCIES, THE FIRM'S SUPERVISORY SYSTEM DID NOT IDENTIFY THESE TRADES AS POTENTIAL INSTANCES OF SPOOFING WARRANTING FURTHER REVIEW. THE FIRM BEGAN REMEDIATING THE SUPERVISORY DEFICIENCIES IN MID-2019 AND COMPLETED REMEDIATION IN OCTOBER 2022. FINE PAID IN FULL ON DECEMBER 10, 2023.

Initiated By: FINRA

Date Initiated: 11/29/2023

Docket/Case Number: [2019063152203](#)

Principal Product Type: Debt - Government

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 11/29/2023

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

Sanctions Ordered: Censure
Monetary/Fine \$24,000,000.00

Other Sanctions Ordered:



Sanction Details: THE FIRM WAS CENSURED AND FINED \$24 MILLION.

Reporting Source: Firm

Current Status: Final

Allegations: THE FINANCIAL INDUSTRY REGULATORY AUTHORITY ALLEGED THAT FROM OCTOBER 2014 THROUGH FEBRUARY 2021, BOFA SECURITIES, INC. ("THE FIRM"), THROUGH TWO FORMER TRADERS, ENGAGED IN SPOOFING IN VIOLATION OF FINRA RULE 2010 AND, FROM AT LEAST OCTOBER 2014 THROUGH SEPTEMBER 2022, FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM REASONABLY DESIGNED TO DETECT SPOOFING, INCLUDING POTENTIAL CROSS-PRODUCT SPOOFING IN THE U.S. TREASURY MARKETS IN VIOLATION OF FINRA RULES 2010 AND 3110 AND NASD RULE 3010.

Initiated By: FINANCIAL INDUSTRY REGULATORY AUTHORITY

Date Initiated: 11/29/2023

Docket/Case Number: [2019063152203](#)

Principal Product Type: Debt - Government

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 11/29/2023

Sanctions Ordered: Censure
Monetary/Fine \$24,000,000.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM AGREED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$24,000,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC.

Firm Statement WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM AGREED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$24,000,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC.



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Reporting Source:	Firm
Current Status:	Final
Allegations:	CME GROUP ALLEGED THAT BETWEEN JANUARY 2023 AND JULY 2023, BOFA SECURITIES, INC. ("THE FIRM") SUBMITTED PROPRIETARY BLOCK TRADES IN FUTURES UNDER AN ACCOUNT DESIGNATED FOR CUSTOMER ORDERS, THUS SUBMITTING INACCURATE FUTURES BLOCK TRADE REPORTS TO THE EXCHANGE, IN VIOLATION OF CBOT AND CME RULES 526 AND 526.F.
Initiated By:	CME GROUP
Date Initiated:	10/26/2023
Docket/Case Number:	CBOT RSRH-23-6945 AND CME-RSRH-23-6945
Principal Product Type:	Other
Other Product Type(s):	BLOCK TRADES IN FUTURES
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	SUMMARY ACTION
Resolution:	Other
Resolution Date:	10/26/2023
Sanctions Ordered:	Monetary/Fine \$4,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE SUMMARY ACTION IS BASED, THE FIRM WAS ORDERED TO PAY A \$4,000 FINE (\$2000 TO CBOT AND \$2000 TO CME).
Firm Statement	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE SUMMARY ACTION IS BASED, THE FIRM WAS ORDERED TO PAY A \$4,000 FINE (\$2000 TO CBOT AND \$2000 TO CME).

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Reporting Source:	Firm
Current Status:	Final



Allegations:	THE CHICAGO BOARD OF TRADE CLEARING HOUSE RISK COMMITTEE ("COMMITTEE") FOUND THAT BOFA SECURITIES, INC. ("THE FIRM") VIOLATED CBOT RULES 930.E.1., 930.E.2., 930.E.3., AND 930.F. THE FIRM NEITHER ADMITTED NOR DENIED THE RULE VIOLATION UPON WHICH THIS PENALTY IS BASED.
Initiated By:	CHICAGO BOARD OF TRADE
Date Initiated:	06/09/2023
Docket/Case Number:	22-CH-2311
Principal Product Type:	Other
Other Product Type(s):	PERFORMANCE BONDS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	06/09/2023
Sanctions Ordered:	Monetary/Fine \$150,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE SUMMARY FINE IS BASED, THE FIRM WAS ORDERED TO PAY A \$150,000 FINE. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE NOTICE OF DISCIPLINARY ACTION.
Firm Statement	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE SUMMARY FINE IS BASED, THE FIRM WAS ORDERED TO PAY A \$150,000 FINE. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE NOTICE OF DISCIPLINARY ACTION.

Disclosure 46 of 69

Reporting Source:	Firm
Current Status:	Final
Allegations:	CME GROUP ALLEGED THAT BOFA SECURITIES, INC. ("THE FIRM") INACCURATELY REPORTED ITS OPEN INTEREST IN A CERTAIN FUTURES CONTRACT ON A SINGLE DAY, IN VIOLATION OF NYMEX RULE 854.
Initiated By:	CME GROUP



Date Initiated:	05/03/2023
Docket/Case Number:	NYMEX-RSRH-23-6903
Principal Product Type:	Futures - Commodity
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	SUMMARY FINE
Resolution:	Other
Resolution Date:	05/03/2023
Sanctions Ordered:	Monetary/Fine \$1,500.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE SUMMARY FINE IS BASED, THE FIRM WAS ORDERED TO PAY A \$1,500 FINE. THE FIRM PAID THE FINE IN ACCORDANCE WITH THE TERMS OF THE SUMMARY FINE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE SUMMARY FINE IS BASED, THE FIRM WAS ORDERED TO PAY A \$1,500 FINE. THE FIRM PAID THE FINE IN ACCORDANCE WITH THE TERMS OF THE SUMMARY FINE.

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Reporting Source:	Firm
Current Status:	Final
Allegations:	CME GROUP MARKET REGULATION ALLEGED THAT BETWEEN OCTOBER 1, 2022 AND DECEMBER 31, 2022, BOFA SECURITIES, INC. ("THE FIRM") SUBMITTED INCORRECT ACCOUNT NUMBERS AT ORDER ENTRY FOR ORDERS ON THE CME GROUP GLOBEX TRADING SYSTEM, IN VIOLATION OF RULE 536.B.1.
Initiated By:	CME GROUP
Date Initiated:	03/24/2023
Docket/Case Number:	CBOT-DQA-23-1087
Principal Product Type:	No Product



Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	SUMMARY ACTION
Resolution:	Other
Resolution Date:	03/24/2023
Sanctions Ordered:	Monetary/Fine \$2,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE SUMMARY ACTION IS BASED, THE FIRM WAS ORDERED TO PAY A \$2,000 FINE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE SUMMARY ACTION IS BASED, THE FIRM WAS ORDERED TO PAY A \$2,000 FINE.

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Reporting Source:	Firm
Current Status:	Final
Allegations:	THE CHICAGO MERCANTILE EXCHANGE INC. ("CME") CLEARING HOUSE RISK COMMITTEE ("COMMITTEE") FOUND THAT BOFA SECURITIES, INC. ("THE FIRM") VIOLATED CUSTOMER GROSS MARGINING TECHNICAL OVERVIEW REQUIREMENTS AND CME RULE 980.G. THE FIRM NEITHER ADMITTED NOR DENIED THE RULE VIOLATION UPON WHICH THIS PENALTY IS BASED.
Initiated By:	CHICAGO MERCANTILE EXCHANGE INC.
Date Initiated:	12/19/2022
Docket/Case Number:	22-CH-2206
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:	Other
Resolution Date:	12/19/2022
Sanctions Ordered:	Monetary/Fine \$1,000,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE COMMITTEE ORDERED THE FIRM TO PAY A \$1,000,000 FINE. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE DISCIPLINARY NOTICE.
Firm Statement	THE COMMITTEE ORDERED THE FIRM TO PAY A \$1,000,000 FINE. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE DISCIPLINARY NOTICE.

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Reporting Source:	Firm
Current Status:	Final
Allegations:	CME GROUP MARKET REGULATION ALLEGED THAT BOFA SECURITIES, INC. ("THE FIRM") FAILED TO APPROPRIATELY REGISTER CERTAIN OPERATOR IDS ON THE CME GROUP GLOBEX TRADING SYSTEM, IN VIOLATION OF RULE 576.
Initiated By:	CME GROUP
Date Initiated:	12/05/2022
Docket/Case Number:	CME DQA-22-0987
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	SUMMARY FINE
Resolution:	Other
Resolution Date:	12/05/2022
Sanctions Ordered:	Monetary/Fine \$5,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE RULE VIOLATIONS UPON WHICH THE SUMMARY FINE IS BASED, THE FIRM WAS ORDERED TO PAY A \$5,000



FINE.

Firm Statement

WITHOUT ADMITTING OR DENYING THE RULE VIOLATIONS UPON WHICH THE SUMMARY FINE IS BASED, THE FIRM WAS ORDERED TO PAY A \$5,000 FINE.

Disclosure 50 of 69**Reporting Source:** Regulator**Current Status:** Final

Allegations: DURING THE PERIOD OF MARCH 2014 AND MAY 2020, BANK OF AMERICA SECURITIES VIOLATED NASDAQ RULES 4611(A)(6), 3010 AND 2010A (FOR CONDUCT OCCURRING BEFORE DECEMBER 6, 2019) AND NASDAQ RULE GENERAL 9, SECTION 20(A) AND GENERAL 9, SECTION L(A) (FOR CONDUCT ON OR AFTER DECEMBER 6, 2019) FOR FAILING TO INPUT THE CORRECT CAPACITY CODES ON EQUITY ORDERS ENTERED INTO NASDAQ SYSTEMS.

Initiated By: NASDAQ STOCK MARKET**Date Initiated:** 11/23/2022**Docket/Case Number:** 2021.05.318**Principal Product Type:** Equity Listed (Common & Preferred Stock)**Other Product Type(s):****Principal Sanction(s)/Relief Sought:** Civil and Administrative Penalt(ies) /Fine(s)**Other Sanction(s)/Relief Sought:****Resolution:** Acceptance, Waiver & Consent(AWC)**Resolution Date:** 11/23/2022

Sanctions Ordered: Censure
Monetary/Fine \$385,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$385,000.

Reporting Source: Firm**Current Status:** Final



Allegations:	THE NASDAQ STOCK EXCHANGE, LLC (NASDAQ) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) MISMARKED CERTAIN ORDERS ON NASDAQ WITH A "PRINCIPAL" CAPACITY CODE FROM MARCH 2014 TO MAY 2020, IN VIOLATION OF NASDAQ RULES 4611(A)(6), 2010A (FOR CONDUCT BEFORE DECEMBER 6, 2019) AND NASDAQ GENERAL 9 SECTION 1(A) (FOR CONDUCT ON OR AFTER DECEMBER 6, 2019) ; AND DID NOT HAVE A SUPERVISORY SYSTEM OR WRITTEN SUPERVISORY PROCEDURES TO ACHIEVE COMPLIANCE WITH RESPECT TO THE REQUIREMENTS TO ENTER ACCURATE CAPACITY CODES, IN VIOLATION OF NASDAQ RULES 3010 AND 2010A (FOR CONDUCT PRIOR TO DECEMBER 6, 2019) AND NASDAQ RULE GENERAL 9, SECTIONS 20(A) AND 1(A) (FOR CONDUCT ON OR AFTER DECEMBER 6, 2019).
Initiated By:	THE NASDAQ STOCK EXCHANGE, LLC
Date Initiated:	11/29/2022
Docket/Case Number:	NO. 2021.05.318
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	11/29/2022
Sanctions Ordered:	Censure Monetary/Fine \$385,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$385,000 (AWC). THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH NASDAQ, CBOE BZX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., NEW YORK STOCK EXCHANGE LLC, AND NYSE ARCA, INC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$385,000 (AWC). THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH NASDAQ, CBOE BZX EXCHANGE, INC., CBOE BYX



EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., NEW YORK STOCK EXCHANGE LLC, AND NYSE ARCA, INC.

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Reporting Source: Regulator

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT VIOLATED NYSE ARCA RULE 7.33-E. THE FINDINGS STATED THAT THE FIRM USED THREE PLATFORMS FOR CERTAIN BROKER-DEALER AND INSTITUTIONAL CLIENTS TO SEND DIRECTED ORDER FLOW THAT DID NOT CHANGE THE CAPACITY CODES ON ORDERS FROM THOSE CLIENTS FROM "PRINCIPAL" (REFLECTING THE CLIENTS' CAPACITY) TO "AGENCY" (REFLECTING THE FIRM'S CAPACITY) BEFORE THOSE ORDERS REACHED AN EXCHANGE OR OTHER MARKET CENTER. AS A RESULT, THE FIRM INCORRECTLY ENTERED OVER 364 MILLION CLIENT ORDERS INTO THE NYSE ARCA MARKETPLACE MARKED WITH THE "PRINCIPAL" CAPACITY CODE WHEN THEY SHOULD HAVE BEEN MARKED WITH THE "AGENCY" CAPACITY CODE. THE FINDINGS ALSO STATED THAT THE FIRM VIOLATED NYSE ARCA RULES 11.18(B) AND (C). THE FIRM DID NOT HAVE ANY SUPERVISORY SYSTEM OR WRITTEN SUPERVISORY PROCEDURES IN PLACE THAT WERE REASONABLY DESIGNED TO CONFIRM THAT CLIENT ORDERS WERE CODED WITH ACCURATE CAPACITIES AND THUS ENSURE COMPLIANCE WITH NYSE ARCA RULES REQUIRING THAT ORDERS SUBMITTED TO NYSE ARCA ARE MARKED WITH ACCURATE AGENCY OR PRINCIPAL CAPACITY CODES. SPECIFICALLY, THE FIRM HAD NO WRITTEN SUPERVISORY PROCEDURES CONCERNING THE ENTRY OR REVIEW OF CAPACITY CODES. NOR DID THE FIRM HAVE ANY SUPERVISION FOR COMPLIANCE WITH ITS CAPACITY CODE OBLIGATIONS, RESULTING IN THE FIRM'S FAILURE TO CONDUCT ANY REVIEWS OF ITS CAPACITY CODE MARKING.

Initiated By: NYSE ARCA, INC.

Date Initiated: 11/28/2022

Docket/Case Number: 2022-03-17-00039

Principal Product Type: Other

Other Product Type(s): UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief Sought:


Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 11/28/2022

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

Sanctions Ordered: Censure
Monetary/Fine \$400,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED A TOTAL OF \$2.75 MILLION, OF WHICH \$400,000 IS PAYABLE TO NYSE ARCA. THE REMAINDER OF THE FINE IS PAYABLE TO NEW YORK STOCK EXCHANGE LLC, NASDAQ STOCK MARKET LLC, CBOE BZX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., AND CBOE EDGX EXCHANGE, INC.

Reporting Source: Firm

Current Status: Final

Allegations: NYSE ARCA, INC. (ARCA) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) MISMARKED CERTAIN ORDERS ON ARCA WITH A "PRINCIPAL" CAPACITY CODE FROM MARCH 2014 TO MAY 2020, IN VIOLATION OF ARCA RULE 7.33-E; AND DID NOT HAVE ANY WRITTEN SUPERVISORY PROCEDURES OR SUPERVISORY PROCESSES IN PLACE TO ENSURE COMPLIANCE WITH ARCA RULES THAT REQUIRE ORDERS SUBMITTED TO ARCA ARE MARKED WITH ACCURATE AGENCY OR PRINCIPAL CAPACITY CODES, IN VIOLATION OF ARCA RULES 11.18(B) AND (C).

Initiated By: NYSE ARCA, INC.

Date Initiated: 11/17/2022

Docket/Case Number: NO. 2022-03-17-00039

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure



Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 11/17/2022

Sanctions Ordered: Censure
Monetary/Fine \$400,000.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$400,000 (AWC). THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH ARCA, CBOE BZX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., THE NASDAQ STOCK EXCHANGE, LLC, AND NEW YORK STOCK EXCHANGE LLC.

Firm Statement WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$400,000 (AWC). THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH ARCA, CBOE BZX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., THE NASDAQ STOCK EXCHANGE, LLC, AND NEW YORK STOCK EXCHANGE LLC.

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Reporting Source: Regulator

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT VIOLATED NYSE RULE 7.33. THE FINDINGS STATED THAT THE FIRM USED THREE PLATFORMS FOR CERTAIN BROKER-DEALER AND INSTITUTIONAL CLIENTS TO SEND DIRECTED ORDER FLOW THAT DID NOT CHANGE THE CAPACITY CODES ON ORDERS FROM THOSE CLIENTS FROM "PRINCIPAL" (REFLECTING THE CLIENTS' CAPACITY) TO "AGENCY" (REFLECTING THE FIRM'S CAPACITY) BEFORE THOSE ORDERS REACHED AN EXCHANGE OR OTHER MARKET CENTER. AS A RESULT, THE FIRM INCORRECTLY ENTERED OVER 1.2 MILLION CLIENT ORDERS INTO THE NYSE MARKETPLACE MARKED WITH THE "PRINCIPAL" CAPACITY CODE WHEN THEY SHOULD HAVE BEEN MARKED WITH THE "AGENCY" CAPACITY CODE. THE FINDINGS ALSO STATED THAT THE FIRM VIOLATED NYSE RULES 3110(A) AND (B). THE FIRM DID NOT HAVE ANY SUPERVISORY



SYSTEM OR WRITTEN SUPERVISORY PROCEDURES IN PLACE THAT WERE REASONABLY DESIGNED TO CONFIRM THAT CLIENT ORDERS WERE CODED WITH ACCURATE CAPACITIES AND THUS ENSURE COMPLIANCE WITH NYSE RULES REQUIRING THAT ORDERS SUBMITTED TO THE NYSE ARE MARKED WITH ACCURATE AGENCY OR PRINCIPAL CAPACITY CODES. SPECIFICALLY, THE FIRM HAD NO WRITTEN SUPERVISORY PROCEDURES CONCERNING THE ENTRY OR REVIEW OF CAPACITY CODES. NOR DID THE FIRM HAVE ANY SUPERVISION FOR COMPLIANCE WITH ITS CAPACITY CODE OBLIGATIONS, RESULTING IN THE FIRM'S FAILURE TO CONDUCT ANY REVIEWS OF ITS CAPACITY CODE MARKING.

Initiated By: NEW YORK STOCK EXCHANGE

Date Initiated: 11/28/2022

Docket/Case Number: 2022-03-17-00039

Principal Product Type: Other

Other Product Type(s): UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 11/28/2022

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

Sanctions Ordered: Censure
Monetary/Fine \$40,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED A TOTAL OF \$2.75 MILLION, OF WHICH \$40,000 IS PAYABLE TO NYSE LLC. THE REMAINDER OF THE FINE IS PAYABLE TO NYSE ARCA, INC., NASDAQ STOCK MARKET LLC, CBOE BZX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., AND CBOE EDGX EXCHANGE, INC.

Reporting Source: Firm



Current Status:	Final
Allegations:	NEW YORK STOCK EXCHANGE LLC (NYSE) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) MISMARKED CERTAIN ORDERS ON NYSE WITH A "PRINCIPAL" CAPACITY CODE FROM MARCH 2014 TO MAY 2020, IN VIOLATION OF NYSE RULE 7.33; AND DID NOT HAVE A REASONABLY DESIGNED SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES TO COMPLY WITH ITS CAPACITY CODE OBLIGATIONS, IN VIOLATION OF NYSE RULES 3110(A) AND (B).
Initiated By:	NEW YORK STOCK EXCHANGE LLC
Date Initiated:	11/17/2022
Docket/Case Number:	NO. 2022-03-17-00039
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	11/17/2022
Sanctions Ordered:	Censure Monetary/Fine \$40,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$40,000 (AWC). THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH NYSE, CBOE BZX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., THE NASDAQ STOCK EXCHANGE, LLC, AND NYSE ARCA, INC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$40,000 (AWC). THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE AWC. THE AWC WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH NYSE, CBOE BZX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., THE NASDAQ STOCK EXCHANGE, LLC, AND NYSE ARCA, INC.



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Reporting Source:	Regulator
Current Status:	Final
Allegations:	BOFA SECURITIES, INC. VIOLATED EDGX RULES 3.2, 4.1, AND 11.5, AND SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-3 THEREUNDER, IN THAT THE FIRM SUBMITTED ORDERS WITH AN INACCURATE CAPACITY OF EDGX AND FAILED TO MAINTAIN ACCURATE BOOKS AND RECORDS RELATING TO THE CAPACITY OF SUCH ORDERS. BOFA ALSO VIOLATED EDGX RULE 5.1, IN THAT THE FIRM'S SUPERVISORY SYSTEM, INCLUDING ITS WSPS, WAS NOT REASONABLY DESIGNED TO ASSURE COMPLIANCE WITH EDGX RULE 11.5'S CAPACITY REPORTING REQUIREMENTS.
Initiated By:	CBOE EDGX EXCHANGE, INC.
Date Initiated:	11/16/2022
Docket/Case Number:	FILE NO. URE-13-07
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:	Consent
Resolution Date:	11/16/2022
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$1,058,750.00
Other Sanctions Ordered:	
Sanction Details:	A CENSURE AND A FINE OF \$1,925,000 FOR THE CBOE EXCHANGES, OF WHICH \$1,058,750 IS ALLOCATED TO EDGX.

Reporting Source: Firm



Current Status:	Final
Allegations:	CBOE EDGX EXCHANGE, INC. (EDGX) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) MISMARKED CERTAIN ORDERS ON EDGX WITH A "PRINCIPAL" CAPACITY CODE FROM MARCH 2014 TO OCTOBER 2021, RESULTING IN INACCURATE FIRM BOOKS AND RECORDS, IN VIOLATION OF EDGX RULES 3.2, 4.1, AND 11.5 AS WELL AS SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 (EXCHANGE ACT) AND RULE 17A-3 THEREUNDER; AND DID NOT HAVE ANY WRITTEN SUPERVISORY PROCEDURES OR SUPERVISORY PROCESSES IN PLACE TO ENSURE COMPLIANCE WITH EDGX RULES THAT REQUIRE ORDERS SUBMITTED TO EDGX ARE MARKED WITH ACCURATE AGENCY OR PRINCIPAL CAPACITY CODES, IN VIOLATION OF EDGX RULE 5.1.
Initiated By:	CBOE EDGX EXCHANGE, INC.
Date Initiated:	11/17/2022
Docket/Case Number:	FILE NO. URE-13-07
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	11/17/2022
Sanctions Ordered:	Censure Monetary/Fine \$1,058,750.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF EDGX RULES OR THE EXCHANGE ACT HAVE BEEN COMMITTED, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$1,058,750 (DECISION). THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE DECISION. THE DECISION WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH EDGX, CBOE BZX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., THE NASDAQ STOCK MARKET, LLC, NEW YORK STOCK EXCHANGE LLC, AND NYSE ARCA, INC.
Firm Statement	WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF EDGX RULES OR THE EXCHANGE ACT HAVE BEEN COMMITTED, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$1,058,750



(DECISION). THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE DECISION. THE DECISION WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH EDGX, CBOE BZX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., THE NASDAQ STOCK MARKET, LLC, NEW YORK STOCK EXCHANGE LLC, AND NYSE ARCA, INC.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	BOFA SECURITIES, INC. VIOLATED BYX RULES 3.2, 4.1, AND 11.21, AND SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-3 THEREUNDER, IN THAT THE FIRM SUBMITTED ORDERS WITH AN INACCURATE CAPACITY TO BYX AND FAILED TO MAINTAIN ACCURATE BOOKS AND RECORDS RELATING TO THE CAPACITY OF SUCH ORDERS. THE FIRM ALSO VIOLATED BYX RULE 5.1, IN THAT THE FIRM'S SUPERVISORY SYSTEM, INCLUDING ITS WSPS, WAS NOT REASONABLY DESIGNED TO ASSURE COMPLIANCE WITH BYX RULE 11.21'S CAPACITY REPORTING REQUIREMENTS.
Initiated By:	CBOE BYX EXCHANGE, INC.
Date Initiated:	11/16/2022
Docket/Case Number:	FILE NO. URE-13-06
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:	Consent
Resolution Date:	11/16/2022
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$57,750.00

**Other Sanctions Ordered:**

Sanction Details: A CENSURE AND A FINE OF \$1,925,000 FOR THE CBOE EXCHANGES, OF WHICH \$57,750 IS ALLOCATED TO BYX.

Reporting Source: Firm

Current Status: Final

Allegations: CBOE BYX EXCHANGE, INC. (BYX) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) MISMARKED CERTAIN ORDERS ON BYX WITH A "PRINCIPAL" CAPACITY CODE FROM MARCH 2014 TO OCTOBER 2021, RESULTING IN INACCURATE FIRM BOOKS AND RECORDS, IN VIOLATION OF BYX RULES 3.2, 4.1, AND 11.21 AS WELL AS SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 (EXCHANGE ACT) AND RULE 17A-3 THEREUNDER; AND DID NOT HAVE ANY WRITTEN SUPERVISORY PROCEDURES OR SUPERVISORY PROCESSES IN PLACE TO ENSURE COMPLIANCE WITH BYX RULES THAT REQUIRE ORDERS SUBMITTED TO BYX ARE MARKED WITH ACCURATE AGENCY OR PRINCIPAL CAPACITY CODES, IN VIOLATION OF BYX RULE 5.1.

Initiated By: CBOE BYX EXCHANGE, INC.

Date Initiated: 11/17/2022

Docket/Case Number: FILE NO. URE-13-06

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Decision

Resolution Date: 11/17/2022

Sanctions Ordered: Censure
Monetary/Fine \$57,750.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF BYX RULES OR THE EXCHANGE ACT HAVE BEEN COMMITTED, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$57,750 (DECISION). THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF



THE DECISION. THE DECISION WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH BYX, CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., THE NASDAQ STOCK MARKET, LLC, NEW YORK STOCK EXCHANGE LLC, AND NYSE ARCA, INC.

Firm Statement

WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF BYX RULES OR THE EXCHANGE ACT HAVE BEEN COMMITTED, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$57,750 (DECISION). THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE DECISION. THE DECISION WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH BYX, CBOE BZX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., THE NASDAQ STOCK MARKET, LLC, NEW YORK STOCK EXCHANGE LLC, AND NYSE ARCA, INC.

Disclosure 55 of 69

Reporting Source: Regulator

Current Status: Final

Allegations: BOFA SECURITIES, INC. VIOLATED EDGA RULES 3.2, 4.1, AND 11.5, AND SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-3 THEREUNDER, IN THAT THE FIRM SUBMITTED ORDERS WITH AN INACCURATE CAPACITY TO EDGA AND FAILED TO MAINTAIN ACCURATE BOOKS AND RECORDS RELATING TO THE CAPACITY OF SUCH ORDERS. BOFA ALSO VIOLATED EDGA RULE 5.1, IN THAT THE FIRM'S SUPERVISORY SYSTEM, INCLUDING ITS WSPS, WAS NOT REASONABLY DESIGNED TO ASSURE COMPLIANCE WITH EDGA RULE 11.5'S CAPACITY REPORTING REQUIREMENTS.

Initiated By: CBOE EDGA EXCHANGE, INC.

Date Initiated: 11/16/2022

Docket/Case Number: FILE NO. URE-13-08

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: Consent

Resolution Date: 11/16/2022



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?

No

Sanctions Ordered:

Censure
Monetary/Fine \$134,750.00

Other Sanctions Ordered:

Sanction Details:

A CENSURE AND A FINE OF \$1,925,000 FOR THE CBOE EXCHANGES, OF WHICH \$134,750 IS ALLOCATED TO EDGA.

Reporting Source:

Firm

Current Status:

Final

Allegations:

CBOE EDGA EXCHANGE, INC. (EDGA) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) MISMARKED CERTAIN ORDERS ON EDGA WITH A "PRINCIPAL" CAPACITY CODE FROM MARCH 2014 TO OCTOBER 2021, RESULTING IN INACCURATE FIRM BOOKS AND RECORDS, IN VIOLATION OF EDGA RULES 3.2, 4.1, AND 11.5 AS WELL AS SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 (EXCHANGE ACT) AND RULE 17A-3 THEREUNDER; AND DID NOT HAVE ANY WRITTEN SUPERVISORY PROCEDURES OR SUPERVISORY PROCESSES IN PLACE TO ENSURE COMPLIANCE WITH EDGA RULES THAT REQUIRE ORDERS SUBMITTED TO EDGA ARE MARKED WITH ACCURATE AGENCY OR PRINCIPAL CAPACITY CODES, IN VIOLATION OF EDGA RULE 5.1.

Initiated By:

CBOE EDGA EXCHANGE, INC.

Date Initiated:

11/17/2022

Docket/Case Number:

FILE NO. URE-13-08

Principal Product Type:

No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Censure

Other Sanction(s)/Relief Sought:

Resolution:

Decision

Resolution Date:

11/17/2022



Sanctions Ordered:	Censure Monetary/Fine \$134,750.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF EDGA RULES OR THE EXCHANGE ACT HAVE BEEN COMMITTED, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$134,750 (DECISION). THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE DECISION. THE DECISION WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH EDGA, CBOE BZX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., THE NASDAQ STOCK MARKET, LLC, NEW YORK STOCK EXCHANGE LLC, AND NYSE ARCA, INC.
Firm Statement	WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF EDGA RULES OR THE EXCHANGE ACT HAVE BEEN COMMITTED, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$134,750 (DECISION). THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE DECISION. THE DECISION WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH EDGA, CBOE BZX EXCHANGE, INC., CBOE BYX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., THE NASDAQ STOCK MARKET, LLC, NEW YORK STOCK EXCHANGE LLC, AND NYSE ARCA, INC.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	BOFA SECURITIES, INC. VIOLATED BZX RULES 3.2, 4.1, AND 11.21, AND SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-3 THEREUNDER, IN THAT THE FIRM SUBMITTED ORDERS WITH AN INACCURATE CAPACITY TO BZX AND FAILED TO MAINTAIN ACCURATE BOOKS AND RECORDS RELATING TO THE CAPACITY OF SUCH ORDERS. BOFA ALSO VIOLATED BZX RULE 5.1 IN THAT THE FIRM'S SUPERVISORY SYSTEM, INCLUDING ITS WSPS, WAS NOT REASONABLY DESIGNED TO ASSURE COMPLIANCE WITH BZX RULE 11.21'S CAPACITY REPORTING REQUIREMENTS.
Initiated By:	CBOE BZX EXCHANGE, INC.
Date Initiated:	11/09/2022
Docket/Case Number:	FILE NO. URE-13-05
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: Consent

Resolution Date: 11/16/2022

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

Sanctions Ordered: Censure
Monetary/Fine \$673,750.00

Other Sanctions Ordered:
Sanction Details: A CENSURE AND A MONETARY FINE OF \$1,925,000 FOR THE CBOE EXCHANGE, OF WHICH \$673,750 IS ALLOCATED TO BZX.

Reporting Source: Firm

Current Status: Final

Allegations: CBOE BZX EXCHANGE, INC. (BZX) ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) MISMARKED CERTAIN ORDERS ON BZX WITH A "PRINCIPAL" CAPACITY CODE FROM MARCH 2014 TO OCTOBER 2021, RESULTING IN INACCURATE FIRM BOOKS AND RECORDS, IN VIOLATION OF BZX RULES 3.2, 4.1, AND 11.21 AS WELL AS SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 (EXCHANGE ACT) AND RULE 17A-3 THEREUNDER; AND DID NOT HAVE ANY WRITTEN SUPERVISORY PROCEDURES OR SUPERVISORY PROCESSES IN PLACE TO ENSURE COMPLIANCE WITH BZX RULES THAT REQUIRE ORDERS SUBMITTED TO BZX ARE MARKED WITH ACCURATE AGENCY OR PRINCIPAL CAPACITY CODES, IN VIOLATION OF BZX RULE 5.1.

Initiated By: CBOE BZX EXCHANGE, INC.

Date Initiated: 11/17/2022

Docket/Case Number: FILE NO. URE-13-05

Principal Product Type: No Product

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



Other Sanction(s)/Relief Sought:

Resolution: Decision

Resolution Date: 11/17/2022

Sanctions Ordered: Censure
Monetary/Fine \$673,750.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF BZX RULES OR THE EXCHANGE ACT HAVE BEEN COMMITTED, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$673,750 (DECISION). THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE DECISION. THE DECISION WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH BZX, CBOE BYX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., THE NASDAQ STOCK MARKET, LLC, NEW YORK STOCK EXCHANGE LLC, AND NYSE ARCA, INC.

Firm Statement WITHOUT ADMITTING OR DENYING THAT VIOLATIONS OF BZX RULES OR THE EXCHANGE ACT HAVE BEEN COMMITTED, THE FIRM CONSENTED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$673,750 (DECISION). THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE DECISION. THE DECISION WAS PART OF A TOTAL SETTLEMENT THE FIRM REACHED WITH BZX, CBOE BYX EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., THE NASDAQ STOCK MARKET, LLC, NEW YORK STOCK EXCHANGE LLC, AND NYSE ARCA, INC.

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Reporting Source: Regulator

Current Status: Final

Allegations: THE COMMODITY FUTURES TRADING COMMISSION ("COMMISSION") HAS REASON TO BELIEVE THAT FROM AT LEAST 2015 TO THE PRESENT ("RELEVANT PERIOD"), BANK OF AMERICA, N.A., BOFA SECURITIES, INC., AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED (COLLECTIVELY, "BOFA" OR "RESPONDENTS") VIOLATED, AS SET FORTH BELOW, SECTIONS 4G, 4S(F)(1)(C), 4S(G) (1) AND (3), AND 4S(H)(1)(B) OF THE COMMODITY EXCHANGE ACT ("ACT"), 7 U.S.C. §§ 6G, 6S(F)(1)(C), 6S(G)(1), (3), 6S(H)(1)(B), AND COMMISSION REGULATIONS ("REGULATIONS") 1.31, 1.35, 23.201(A), 23.202(A)(1) AND (B)(1), 23.602(A), AND 166.3, 17 C.F.R. §§ 1.31, 1.35, 23.201(A), 23.202(A)(1), (B)(1), 23.602(A), 166.3 (2021). THEREFORE, THE COMMISSION DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE PROCEEDINGS



BE, AND HEREBY ARE, INSTITUTED TO DETERMINE WHETHER RESPONDENTS ENGAGED IN THE VIOLATIONS SET FORTH HEREIN AND TO DETERMINE WHETHER ANY ORDER SHOULD BE ISSUED IMPOSING REMEDIAL SANCTIONS. THE COMMISSION FINDS THAT IT BROUGHT TO BOFA'S ATTENTION THE POTENTIAL USE OF UNAPPROVED COMMUNICATION METHODS BY AT LEAST ONE BOFA TRADER, AND HEAD OF ONE OF BOFA'S TRADING DESKS. NOTWITHSTANDING THE COMMISSION FLAGGING THIS ISSUE TWICE, TRADERS ON THE DESK CONTINUED TO USE UNAPPROVED MESSAGING METHODS TO CONDUCT FIRM BUSINESS FOR SEVERAL MONTHS. FURTHER, THE DESK HEAD ROUTINELY DIRECTED TRADERS ON THE DESK TO DELETE MESSAGES WITH BUSINESS CONTACTS FROM THEIR PERSONAL DEVICES, AND TRADERS ON THE DESK HAD A PRACTICE OF DELETING MESSAGES, INCLUDING BUSINESS-RELATED MESSAGES, FROM THEIR PERSONAL DEVICES. WHEN BOFA WAS AWARE THAT THE COMMISSION WAS INVESTIGATING CERTAIN TRADING ON THE DESK, THE DESK HEAD INSTRUCTED THREE OF HIS SUBORDINATES TO DELETE MESSAGES FROM THEIR PERSONAL DEVICES AND TO COMMUNICATE VIA AN UNAPPROVED MESSAGING APPLICATION WHEN OFF THE DESK, AND TO HAVE SUCH COMMUNICATIONS SET TO AUTO-DELETE. THE DESK HEAD MADE SIMILAR REQUESTS TO TWO THIRD-PARTY BROKERS. AS A RESULT, BOFA SECURITIES INC. AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED FAILED TO KEEP FULL, COMPLETE, AND SYSTEMATIC RECORDS OF ALL TRANSACTIONS RELATING TO ITS BUSINESS OF DEALING IN COMMODITY INTERESTS, IN VIOLATION OF SECTION 4G OF THE ACT AND REGULATION 1.35. MOREOVER, BY FAILING TO KEEP ALL COMMISSION-REQUIRED RECORDS IN SUCH A MANNER AS TO MAKE THEM "READILY ACCESSIBLE," BANK OF AMERICA, N.A., BOFA SECURITIES, INC., AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED VIOLATED REGULATION 1.31. IN ADDITION, BANK OF AMERICA, N.A., BOFA SECURITIES, INC., AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED VIOLATED REGULATION 1.31 BY NOT PROMPTLY PRODUCING SUCH COMMUNICATIONS UPON REQUEST IN CONNECTION WITH THE COMMISSION'S INVESTIGATION. IN ADDITION, BOFA SECURITIES, INC. AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED FAILED TO SUPERVISE THEIR BUSINESS AS A COMMISSION REGISTRANT BY FAILING TO MAINTAIN ADEQUATE SUPERVISORY SYSTEMS TO ENSURE THAT EMPLOYEES COMPLIED WITH COMMISSION RECORDKEEPING REQUIREMENTS AND COMPANY POLICIES AND PROCEDURES THAT PROHIBITED BUSINESS-RELATED COMMUNICATIONS ON UNAPPROVED METHODS OF COMMUNICATION. THE INADEQUACY OF BOFA SECURITIES, INC. AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED'S SUPERVISORY SYSTEMS IS DEMONSTRATED BY THE LONGSTANDING AND REPEATED VIOLATIONS OF BOFA SECURITIES, INC. AND MERRILL LYNCH, PIERCE, FENNER & SMITH



INCORPORATED'S COMMISSION RECORDKEEPING REGULATIONS AND COMPANY POLICIES AND PROCEDURES, INCLUDING BY SUPERVISORY PERSONNEL, AND THE FACT THAT THE SUPERVISORY FAILURES RESULTED IN THE REPEATED FAILURE TO MAINTAIN COMMISSION-REQUIRED RECORDS, TO ENSURE THAT THE REQUIRED RECORDS WERE READILY ACCESSIBLE, AND THAT THE RECORDS COULD BE PROMPTLY PRODUCED UPON REQUEST. BY THIS CONDUCT, BOFA SECURITIES, INC. AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED FAILED TO SUPERVISE DILIGENTLY ITS OFFICERS, EMPLOYEES, AND AGENTS IN VIOLATION OF REGULATION 166.3.

Initiated By:	COMMODITY FUTURES TRADING COMMISSION
Date Initiated:	09/27/2022
Docket/Case Number:	22-38
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	N/A
Resolution:	Order
Resolution Date:	09/27/2022
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Monetary/Fine \$100,000,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	THE FIRM SHALL CEASE AND DESIST FROM VIOLATING SECTION 4G OF THE ACT, 7 U.S.C. § 6G, AND REGULATIONS 1.31, 1.35, AND 166.3, 17 C.F.R. §§ 1.31, 1.35, 166.3 (2021); PAY, JOINTLY AND SEVERALLY, A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$100,000,000, WITHIN FOURTEEN DAYS OF THE DATE OF THE ENTRY OF THIS ORDER, AND COMPLY WITH THE CONDITIONS AND UNDERTAKINGS SET FORTH IN THE OFFER.
Regulator Statement	RESPONDENTS HAVE SUBMITTED AN OFFER OF SETTLEMENT ("OFFER"), WHICH THE COMMISSION HAS DETERMINED TO ACCEPT. THE FIRM FAILED



TO SUPERVISE DILIGENTLY ITS OFFICERS, EMPLOYEES, AND AGENTS IN VIOLATION OF REGULATION 166.3. ACCORDINGLY, IT IS HEREBY ORDERED THAT BOFA SECURITIES INC. AND ITS SUCCESSORS AND ASSIGNS SHALL CEASE AND DESIST FROM VIOLATING SECTION 4G OF THE ACT, 7 U.S.C. § 6G, AND REGULATIONS 1.31, 1.35, AND 166.3, 17 C.F.R. §§ 1.31, 1.35, 166.3 (2021); SHALL PAY, JOINTLY AND SEVERALLY, A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$100,000,000 ("CMP OBLIGATION"), WITHIN FOURTEEN DAYS OF THE DATE OF THE ENTRY OF THIS ORDER; AND RESPONDENT AND ITS SUCCESSORS AND ASSIGNS SHALL COMPLY WITH THE CONDITIONS AND UNDERTAKINGS SET FORTH IN THE OFFER. IF THE CMP OBLIGATION IS NOT PAID IN FULL WITHIN FOURTEEN DAYS OF THE DATE OF ENTRY OF THIS ORDER, THEN POST-JUDGMENT INTEREST SHALL ACCRUE ON THE CMP OBLIGATION BEGINNING ON THE DATE OF ENTRY OF THIS ORDER.

Reporting Source:	Firm
Current Status:	Final
Allegations:	THE COMMODITIES FUTURES TRADING COMMISSION ("CFTC") ENTERED INTO A SETTLEMENT ORDER ("ORDER") WITH BOFAS SECURITIES, INC. ("BOFAS"), MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED ("MLPFS"), AND BANK OF AMERICA, N.A. ("BANA", AND COLLECTIVELY WITH BOFAS AND MLPFS, THE "RESPONDENTS") SETTling AN ADMINISTRATIVE ACTION CONCERNING (A) BANA'S FAILURE TO MAINTAIN REQUIRED RECORDS IN VIOLATION OF SECTIONS 4S(F)(1)(C) AND 4S(G)(1) AND (3) OF THE COMMODITY EXCHANGE ACT ("ACT") AND CFTC REGULATIONS ("REGULATIONS") 23.201(A) AND 23.202(A)(1) AND (B)(1); (B) BOFAS AND MLPFS' FAILURE TO KEEP REQUIRED RECORDS IN VIOLATION OF SECTION 4G OF THE ACT AND REGULATION 1.35; (C) RESPONDENTS' FAILURE TO KEEP RECORDS IN THE REQUIRED MANNER IN VIOLATION OF REGULATION 1.31; (D) BANA'S FAILURE TO SUPERVISE DILIGENTLY IN VIOLATION OF SECTIONS 4S(H)(1)(B) OF THE ACT AND REGULATION 23.602(A); AND (E) BOFAS AND MLPFS' FAILURE TO DILIGENTLY SUPERVISE IN VIOLATION OF REGULATION 166.3.
Initiated By:	COMMODITY FUTURES TRADING COMMISSION
Date Initiated:	09/27/2022
Docket/Case Number:	22-38
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist



Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 09/27/2022

Sanctions Ordered: Monetary/Fine \$100,000,000.00
Cease and Desist/Injunction

Other Sanctions Ordered: UNDERTAKINGS

Sanction Details: THE RESPONDENTS ADMITTED TO THE FACTS IN THE SETTLEMENT ORDER, EXCEPT AS TO SECTIONS II.A.2 AND II.C.2 OF THE ORDER, WHICH FACTS THEY NEITHER ADMITTED NOR DENIED, ACKNOWLEDGED THEIR CONDUCT VIOLATED THE ACT AND REGULATIONS AND AGREED TO THE FOLLOWING SANCTIONS: (A) BANA TO CEASE AND DESIST FROM VIOLATING SECTIONS 4S(F)(1)(C), 4S(G)(1) AND (3), AND 4S(H)(1)(B) OF THE ACT, AND REGULATIONS 1.31, 23.201, 23.202(A)(1) AND (B)(1) AND 23.602(A) AND BOFAS AND MLPFS TO CEASE AND DESIST FROM VIOLATING SECTION 4G OF THE ACT AND REGULATIONS 1.31, 1.35 AND 166.3, (B) TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$100,000,000, AND (C) TO COMPLY WITH CERTAIN CONDITIONS AND UNDERTAKINGS.

Firm Statement THE RESPONDENTS ADMITTED TO THE FACTS IN THE SETTLEMENT ORDER, EXCEPT AS TO SECTIONS II.A.2 AND II.C.2 OF THE ORDER, WHICH FACTS THEY NEITHER ADMITTED NOR DENIED, ACKNOWLEDGED THEIR CONDUCT VIOLATED THE ACT AND REGULATIONS AND AGREED TO THE FOLLOWING SANCTIONS: (A) BANA TO CEASE AND DESIST FROM VIOLATING SECTIONS 4S(F)(1)(C), 4S(G)(1) AND (3), AND 4S(H)(1)(B) OF THE ACT, AND REGULATIONS 1.31, 23.201, 23.202(A)(1) AND (B)(1) AND 23.602(A) AND BOFAS AND MLPFS TO CEASE AND DESIST FROM VIOLATING SECTION 4G OF THE ACT AND REGULATIONS 1.31, 1.35 AND 166.3, (B) TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$100,000,000, AND (C) TO COMPLY WITH CERTAIN CONDITIONS AND UNDERTAKINGS.

Reporting Source: Firm

Current Status: Final

Allegations: THE COMMODITIES FUTURES TRADING COMMISSION ("CFTC") ENTERED INTO A SETTLEMENT ORDER ("ORDER") WITH BOFAS SECURITIES, INC. ("BOFAS"), MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED ("MLPFS"), AND BANK OF AMERICA, N.A. ("BANA", AND COLLECTIVELY WITH BOFAS AND MLPFS, THE "RESPONDENTS") SETTling AN ADMINISTRATIVE ACTION CONCERNING (A) BANA'S FAILURE TO MAINTAIN REQUIRED RECORDS IN VIOLATION OF SECTIONS 4S(F)(1)(C) AND 4S(G)(1) AND (3) OF



THE COMMODITY EXCHANGE ACT ("ACT") AND CFTC REGULATIONS ("REGULATIONS") 23.201(A) AND 23.202(A)(1) AND (B)(1); (B) BOFAS AND MLPFS' FAILURE TO KEEP REQUIRED RECORDS IN VIOLATION OF SECTION 4G OF THE ACT AND REGULATION 1.35; (C) RESPONDENTS' FAILURE TO KEEP RECORDS IN THE REQUIRED MANNER IN VIOLATION OF REGULATION 1.31; (D) BANA'S FAILURE TO SUPERVISE DILIGENTLY IN VIOLATION OF SECTIONS 4S(H)(1)(B) OF THE ACT AND REGULATION 23.602(A); AND (E) BOFAS AND MLPFS' FAILURE TO DILIGENTLY SUPERVISE IN VIOLATION OF REGULATION 166.3.

Initiated By: COMMODITY FUTURES TRADING COMMISSION

Date Initiated: 09/27/2022

Docket/Case Number: 22-38

Principal Product Type: No Product

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 09/27/2022

Sanctions Ordered: Monetary/Fine \$100,000,000.00
Cease and Desist/Injunction

Other Sanctions Ordered: UNDERTAKINGS

Sanction Details: THE RESPONDENTS ADMITTED TO THE FACTS IN THE SETTLEMENT ORDER, EXCEPT AS TO SECTIONS II.A.2 AND II.C.2 OF THE ORDER, WHICH FACTS THEY NEITHER ADMITTED NOR DENIED, ACKNOWLEDGED THEIR CONDUCT VIOLATED THE ACT AND REGULATIONS AND AGREED TO THE FOLLOWING SANCTIONS: (A) BANA TO CEASE AND DESIST FROM VIOLATING SECTIONS 4S(F)(1)(C), 4S(G)(1) AND (3), AND 4S(H)(1)(B) OF THE ACT, AND REGULATIONS 1.31, 23.201, 23.202(A)(1) AND (B)(1) AND 23.602(A) AND BOFAS AND MLPFS TO CEASE AND DESIST FROM VIOLATING SECTION 4G OF THE ACT AND REGULATIONS 1.31, 1.35 AND 166.3, (B) TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$100,000,000, AND (C) TO COMPLY WITH CERTAIN CONDITIONS AND UNDERTAKINGS.

Firm Statement THE RESPONDENTS ADMITTED TO THE FACTS IN THE SETTLEMENT ORDER, EXCEPT AS TO SECTIONS II.A.2 AND II.C.2 OF THE ORDER, WHICH FACTS THEY NEITHER ADMITTED NOR DENIED, ACKNOWLEDGED THEIR CONDUCT VIOLATED THE ACT AND REGULATIONS AND AGREED TO THE



FOLLOWING SANCTIONS: (A) BANA TO CEASE AND DESIST FROM VIOLATING SECTIONS 4S(F)(1)(C), 4S(G)(1) AND (3), AND 4S(H)(1)(B) OF THE ACT, AND REGULATIONS 1.31, 23.201, 23.202(A)(1) AND (B)(1) AND 23.602(A) AND BOFAS AND MLPFS TO CEASE AND DESIST FROM VIOLATING SECTION 4G OF THE ACT AND REGULATIONS 1.31, 1.35 AND 166.3, (B) TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$100,000,000, AND (C) TO COMPLY WITH CERTAIN CONDITIONS AND UNDERTAKINGS.

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Reporting Source:

Regulator

Current Status:

Final

Allegations:

THE SEC DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS BE, AND HEREBY ARE, INSTITUTED PURSUANT TO SECTIONS 15(B) AND 21C OF THE SECURITIES EXCHANGE ACT OF 1934 AGAINST BOFA SECURITIES, INC. ("BOFAS") AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED ("MLPFS") (COLLECTIVELY "RESPONDENTS" OR "BAML"). IN ANTICIPATION OF THE INSTITUTION OF THESE PROCEEDINGS, RESPONDENTS HAVE SUBMITTED AN OFFER OF SETTLEMENT THAT THE COMMISSION HAS DETERMINED TO ACCEPT. RESPONDENTS ADMIT THE FACTS SET FORTH HEREIN, ACKNOWLEDGE THAT THEIR CONDUCT VIOLATED THE FEDERAL SECURITIES LAWS, ADMIT THE COMMISSION'S JURISDICTION OVER THEM AND THE SUBJECT MATTER OF THESE PROCEEDINGS, AND CONSENT TO THE ENTRY OF THIS ORDER INSTITUTING ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS PURSUANT TO SECTIONS 15(B) AND 21C OF THE SECURITIES EXCHANGE ACT OF 1934, MAKING FINDINGS, AND IMPOSING REMEDIAL SANCTIONS AND A CEASE-AND-DESIST ORDER. ON THE BASIS OF THIS ORDER AND RESPONDENTS' OFFER, THE COMMISSION FINDS THAT THESE PROCEEDINGS ARISE OUT OF THE WIDESPREAD AND LONGSTANDING FAILURE OF RESPONDENTS' EMPLOYEES THROUGHOUT THE FIRMS, INCLUDING AT SENIOR LEVELS, TO ADHERE TO CERTAIN OF THESE ESSENTIAL REQUIREMENTS AND THE FIRM'S OWN POLICIES. USING THEIR PERSONAL DEVICES, THESE EMPLOYEES COMMUNICATED BOTH INTERNALLY AND EXTERNALLY BY PERSONAL TEXT MESSAGES OR OTHER TEXT MESSAGING PLATFORMS SUCH AS WHATSAPP ("OFF-CHANNEL COMMUNICATIONS"). FROM AT LEAST JANUARY 2018 TO SEPTEMBER 2021, BAML EMPLOYEES SENT AND RECEIVED OFF-CHANNEL COMMUNICATIONS THAT RELATED TO THE BUSINESS OF THE BROKER-DEALERS OPERATED BY BAML. RESPONDENTS DID NOT MAINTAIN OR PRESERVE THE SUBSTANTIAL MAJORITY OF THESE WRITTEN COMMUNICATIONS. RESPONDENTS' FAILURES WERE FIRM-WIDE, AND INVOLVED EMPLOYEES AT ALL LEVELS OF AUTHORITY. AS A RESULT, RESPONDENTS VIOLATED



SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A4(B)(4) THEREUNDER. BAML'S SUPERVISORS, WHO WERE RESPONSIBLE FOR PREVENTING THIS MISCONDUCT AMONG JUNIOR EMPLOYEES, ROUTINELY COMMUNICATED OFF-CHANNEL USING THEIR PERSONAL DEVICES. IN FACT, DOZENS OF MANAGING DIRECTORS AND SENIOR SUPERVISORS RESPONSIBLE FOR IMPLEMENTING BAML'S POLICIES AND PROCEDURES AND FOR OVERSEEING EMPLOYEES' COMPLIANCE WITH THOSE POLICIES AND PROCEDURES, THEMSELVES FAILED TO COMPLY WITH FIRM POLICIES BY COMMUNICATING USING NON-FIRM APPROVED METHODS ON THEIR PERSONAL DEVICES ABOUT THE FIRM'S BROKER-DEALER BUSINESS. BAML'S WIDESPREAD FAILURE TO IMPLEMENT ITS POLICIES AND PROCEDURES THAT PROHIBIT SUCH COMMUNICATIONS LED TO ITS FAILURE TO REASONABLY SUPERVISE ITS EMPLOYEES WITHIN THE MEANING OF SECTION 15(B)(4)(E) OF THE EXCHANGE ACT. DURING THE TIME PERIOD THAT RESPONDENTS FAILED TO MAINTAIN AND PRESERVE OFF-CHANNEL COMMUNICATIONS ITS EMPLOYEES SENT AND RECEIVED RELATED TO THE BROKER-DEALER'S BUSINESS, BAML RECEIVED AND RESPONDED TO COMMISSION SUBPOENAS FOR DOCUMENTS AND RECORDS REQUESTS IN NUMEROUS COMMISSION INVESTIGATIONS. AS A RESULT, BAML'S RECORDKEEPING FAILURES LIKELY IMPACTED THE COMMISSION'S ABILITY TO CARRY OUT ITS REGULATORY FUNCTIONS AND INVESTIGATE VIOLATIONS OF THE FEDERAL SECURITIES LAWS ACROSS THESE INVESTIGATIONS. COMMISSION STAFF UNCOVERED BAML'S MISCONDUCT AFTER COMMENCING A RISK-BASED INITIATIVE TO INVESTIGATE THE USE OF OFF-CHANNEL AND UNPRESERVED COMMUNICATIONS AT BROKER-DEALERS. BAML HAS INITIATED A REVIEW OF ITS RECORDKEEPING FAILURES AND BEGUN A PROGRAM OF REMEDIATION.

Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	09/27/2022
Docket/Case Number:	3-21166
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	09/27/2022
Does the order constitute a	No



final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?

Sanctions Ordered:

Censure
Monetary/Fine \$125,000,000.00
Cease and Desist/Injunction

Other Sanctions Ordered:

UNDERTAKING

Sanction Details:

BOFAS IS ORDERED TO CEASE AND DESIST; IS CENSURED; SHALL COMPLY WITH THE UNDERTAKINGS ENUMERATED IN THE OFFER; AND SHALL, JOINTLY AND SEVERALLY, PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$125,000,000 TO THE SEC.

Regulator Statement

IN DETERMINING TO ACCEPT THE OFFER, THE COMMISSION CONSIDERED REMEDIAL ACTS PROMPTLY UNDERTAKEN BY BAML AND COOPERATION AFFORDED THE COMMISSION STAFF. PRIOR TO THIS ACTION, BAML BEGAN ENHANCING ITS POLICIES, PROCEDURES, AND TRAINING CONCERNING THE USE OF APPROVED COMMUNICATIONS METHODS, INCLUDING ON PERSONAL DEVICES, AND BEGAN IMPLEMENTING SIGNIFICANT CHANGES TO THE TECHNOLOGY AVAILABLE TO EMPLOYEES. IN VIEW OF THE FOREGOING, THE COMMISSION DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST TO IMPOSE THE SANCTIONS AGREED TO IN RESPONDENTS' OFFER. ACCORDINGLY, PURSUANT TO SECTIONS 15(B) AND 21C OF THE EXCHANGE ACT, IT IS HEREBY ORDERED THAT: RESPONDENTS CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-4 THEREUNDER; RESPONDENTS ARE CENSURED; RESPONDENTS SHALL COMPLY WITH THE UNDERTAKINGS ENUMERATED IN THE OFFER; AND SHALL, JOINTLY AND SEVERALLY, WITHIN 14 DAYS OF THE ENTRY OF THIS ORDER, PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$125,000,000 TO THE SEC.

Reporting Source:

Firm

Current Status:

Final

Allegations:

THE SECURITIES AND EXCHANGE COMMISSION ALLEGED, IN CONNECTION WITH THE BROKER-DEALER OFF-CHANNEL COMMUNICATIONS INITIATIVE, THAT BOFA SECURITIES, INC. AND MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED (COLLECTIVELY, BAML) FAILED TO (1) MAINTAIN AND PRESERVE OFF-CHANNEL COMMUNICATIONS RELATED TO THE BUSINESS OF THE BROKER-DEALERS OPERATED BY BAML, IN WILLFUL VIOLATION OF SECTION 17(A) OF THE SECURITIES



EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND RULE 17A-4(B)(4) THEREUNDER; AND (2) REASONABLY SUPERVISE THEIR EMPLOYEES WITH A VIEW TO PREVENTING OR DETECTING CERTAIN OF THEIR EMPLOYEES' AIDING AND ABETTING VIOLATIONS OF SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-4(B)(4) THEREUNDER, WITHIN THE MEANING OF SECTION 15(B)(4)(E) OF THE EXCHANGE ACT.

Initiated By: SECURITIES AND EXCHANGE COMMISSION

Date Initiated: 09/27/2022

Docket/Case Number: FILE NO. 3-21166

Principal Product Type: No Product

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 09/27/2022

Sanctions Ordered: Censure
Monetary/Fine \$125,000,000.00
Cease and Desist/Injunction

Other Sanctions Ordered: UNDERTAKINGS

Sanction Details: BAML ADMITTED TO THE FACTS IN THE SETTLEMENT ORDER, ACKNOWLEDGED THEIR CONDUCT VIOLATED THE FEDERAL SECURITIES LAWS AND AGREED TO: (A) CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS OR ANY FUTURE VIOLATIONS OF SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-4 THEREUNDER, (B) BE CENSURED, (C) PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$125,000,000, AND (D) COMPLY WITH CERTAIN UNDERTAKINGS RELATED TO RETENTION OF ELECTRONIC COMMUNICATIONS.

Firm Statement BAML ADMITTED TO THE FACTS IN THE SETTLEMENT ORDER, ACKNOWLEDGED THEIR CONDUCT VIOLATED THE FEDERAL SECURITIES LAWS AND AGREED TO: (A) CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS OR ANY FUTURE VIOLATIONS OF SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-4 THEREUNDER, (B) BE CENSURED, (C) PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$125,000,000, AND (D) COMPLY WITH CERTAIN UNDERTAKINGS RELATED TO RETENTION OF ELECTRONIC COMMUNICATIONS.



Disclosure 59 of 69

Reporting Source: Regulator

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT THE FIRM FAILED TO REPORT OVER-THE COUNTER (OTC) OPTIONS POSITIONS TO THE LARGE OPTIONS POSITIONS REPORTING SYSTEM (LOPR). THE FINDINGS STATED THAT THE FIRM FAILED TO REPORT OTC OPTIONS POSITIONS TO THE LOPR, INCLUDING POSITIONS IN NON-U.S. CURRENCIES AND POSITIONS RESULTING FROM CERTAIN TRANSACTIONS BETWEEN AND AMONG THE FIRM'S AFFILIATES, DUE TO SEVERAL LOGIC ERRORS IN ITS INTERNAL REPORTING SYSTEM. AFTER FINRA ALERTED THE FIRM TO POSITIONS THAT IT FAILED TO REPORT TO THE LOPR, THE FIRM ENGAGED A CONSULTANT TO INVESTIGATE THE UNDERLYING CAUSES OF THE LOPR REPORTING ISSUE IDENTIFIED BY FINRA, TO DETERMINE WHETHER THERE WERE ANY SIMILAR ISSUES WITH THE LOPR REPORTING LOGIC REQUIRING REMEDIATION, AND TO DETERMINE THE TOTAL NUMBER OF INSTANCES OF UNREPORTED OTC LOPR POSITIONS FOR THE RELEVANT PERIOD. THE FIRM'S REVIEW OF ITS LOPR LOGIC REVEALED THREE ADDITIONAL TYPES OF TRANSACTIONS AS NOT REPORTED TO THE LOPR THAT IT DISCLOSED TO FINRA. FIRST, THE FIRM'S LOPR REPORTING SYSTEM MISCLASSIFIED THE COUNTERPARTY TO CERTAIN OTC OPTIONS TRANSACTIONS AS A BROKER-DEALER. THE FIRM DID NOT REPORT THOSE POSITIONS BECAUSE TRANSACTIONS WITH BROKER-DEALER COUNTERPARTIES ARE EXCLUDED FROM OTC LOPR REPORTING. HERE, HOWEVER, THE COUNTERPARTY WAS A BANK AND NOT A BROKER-DEALER. SECOND, THE FIRM FAILED TO REPORT OTC OPTIONS POSITIONS TO THE LOPR AS REQUIRED WHERE THE FIRM ACTED AS AN INTERMEDIARY BETWEEN U.S.-BASED CUSTOMERS AND ITS FOREIGN BROKER-DEALER AFFILIATE. THIRD, IN SOME INSTANCES, THE AFFILIATE'S "COUNTRY" FIELD IN THE FIRM'S LOPR REPORTING SYSTEM WAS DIFFERENT THAN THE AFFILIATE'S "COUNTRY OF INCORPORATION" FIELD, WHICH CAUSED THE SYSTEM TO INCORRECTLY DESIGNATE THE COUNTERPARTY AS FOREIGN AND THE OTC OPTION POSITION AS NOT LOPR REPORTABLE. THE FINDINGS ALSO STATED THAT 26 OF THE POSITIONS THAT THE FIRM FAILED TO REPORT TO THE LOPR VIOLATED APPLICABLE OTC POSITION LIMITS. THE POSITIONS WERE OVER THE APPLICABLE LIMIT FROM ONE TO 24 DAYS AND RANGED FROM 20% TO 2,900% OVER THE LIMIT. IN MOST OF THE INSTANCES, THE FIRM WAS OVER THE POSITION LIMIT ON ONE SIDE OF THE MARKET AND A CUSTOMER WAS OVER THE POSITION LIMIT ON THE OTHER SIDE. THE FINDINGS ALSO INCLUDED THAT THE FIRM'S SUPERVISORY SYSTEM WAS



NOT REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH FINRA RULE 2360(B). THE FIRM FAILED TO ESTABLISH A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE FIRM'S LOPR REPORTING OBLIGATIONS. THE FIRM DID NOT HAVE REASONABLY DESIGNED CONTROLS OR METHODS TO DETERMINE WHETHER POSITIONS WERE REPORTED OR NOT. THE FIRM HAD A PERIODIC REVIEW TOOL TO ENSURE THE ACCURACY OF ITS LOPR REPORTING. HOWEVER, THAT TOOL FAILED TO DETECT WHETHER THERE WERE POSITIONS THAT SHOULD HAVE BEEN REPORTED TO THE LOPR BUT WERE NOT. THE FIRM ALSO FAILED TO TEST ITS LOPR REPORTING SYSTEM AND THE PERIODIC REVIEW TOOL TO DETERMINE WHETHER THEY WERE REASONABLY DESIGNED TO ACCURATELY CAPTURE THE POSITIONS THE FIRM WAS REQUIRED TO REPORT. IN ADDITION, THE FIRM'S SUPERVISORY SYSTEM WAS NOT REASONABLY DESIGNED TO IDENTIFY INSTANCES WHERE OTC OPTIONS POSITIONS EXCEEDED APPLICABLE LIMITS. THE FIRM HAD ALERTS TO IDENTIFY POSITION LIMIT BREACHES, INCLUDING AN ALERT THAT TRIGGERED IF A POSITION WAS AT OR ABOVE 75% OF THE APPLICABLE POSITION LIMIT. HOWEVER, THESE ALERTS DID NOT CONSIDER POSITIONS FROM CERTAIN TRANSACTIONS OF FOREIGN AFFILIATES, CAUSING THE POSITIONS TO APPEAR TO BE BELOW THE APPLICABLE LIMIT.

Initiated By:	FINRA
Date Initiated:	09/12/2022
Docket/Case Number:	2018059109401
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	N/A
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	09/12/2022
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure



Monetary/Fine \$5,000,000.00

Other Sanctions Ordered:

UNDERTAKING

Sanction Details:

THE FIRM WAS CENSURED; FINED \$5,000,000; AND REQUIRED TO ESTABLISH, MAINTAIN, AND ENFORCE SUPERVISORY PROCEDURES, INCLUDING WRITTEN PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH FINRA RULE 2360. FINE PAID IN FULL ON SEPTEMBER 30, 2022.

Reporting Source:

Firm

Current Status:

Final

Allegations:

THE FINANCIAL INDUSTRY REGULATORY AUTHORITY ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) FAILED TO REPORT OVER-THE-COUNTER (OTC) OPTIONS POSITIONS TO THE LARGE OPTIONS POSITION REPORTING SYSTEM (LOPR) IN MORE THAN 7.4 MILLION INSTANCES BETWEEN JANUARY 2009 AND OCTOBER 2020, IN VIOLATION OF FINRA RULES 2360(B)(5) AND 2010; VIOLATED APPLICABLE OTC POSITION LIMITS FOR 26 POSITIONS THAT THE FIRM FAILED TO REPORT TO THE LOPR, IN VIOLATION OF FINRA RULES 2360(B)(3) AND 2010; AND FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH FINRA RULE 2360(B) BETWEEN JANUARY 2014 AND OCTOBER 2020, IN VIOLATION OF NASD RULE 3010 AND FINRA RULES 3110 AND 2010.

Initiated By:

FINANCIAL INDUSTRY REGULATORY AUTHORITY

Date Initiated:

09/12/2022

Docket/Case Number:

[2018059109401](#)

Principal Product Type:

Other

Other Product Type(s):

OTC OPTIONS

Principal Sanction(s)/Relief Sought:

Censure

Other Sanction(s)/Relief Sought:

Resolution:

Acceptance, Waiver & Consent(AWC)

Resolution Date:

09/12/2022

Sanctions Ordered:

Censure
Monetary/Fine \$5,000,000.00

Other Sanctions Ordered:

UNDERTAKING AND CERTIFICATION THAT, AS OF OCTOBER 31, 2022, FIRM



HAS ESTABLISHED, MAINTAINS, AND ENFORCES SUPERVISORY PROCEDURES, INCLUDING WRITTEN PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH FINRA RULE 2360.

Sanction Details:

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM AGREED TO THE IMPOSITION OF A CENSURE, A FINE IN THE AMOUNT OF \$5,000,000, AND CERTIFICATION THAT, AS OF OCTOBER 31, 2022, THE FIRM HAS ESTABLISHED, MAINTAINS, AND ENFORCES SUPERVISORY PROCEDURES, INCLUDING WRITTEN PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH FINRA RULE 2360. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER.

Firm Statement

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM AGREED TO THE IMPOSITION OF A CENSURE, A FINE IN THE AMOUNT OF \$5,000,000, AND CERTIFICATION THAT, AS OF OCTOBER 31, 2022, FIRM HAS ESTABLISHED, MAINTAINS, AND ENFORCES SUPERVISORY PROCEDURES, INCLUDING WRITTEN PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH FINRA RULE 2360. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER.

Disclosure 60 of 69

Reporting Source:

Regulator

Current Status:

Final

Allegations:

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT PUBLISHED INACCURATE MONTHLY REPORTS OF ORDER EXECUTIONS IT WAS REQUIRED TO PUBLISH PURSUANT TO RULE 605 OF REGULATION NATIONAL MARKET SYSTEM (NMS) OF THE SECURITIES EXCHANGE ACT OF 1934. THE FINDINGS STATED THAT THE FIRM PUBLISHED STATISTICAL INFORMATION CONCERNING ORDER EXECUTIONS FOR ITS BROKER-DEALER AND ALTERNATIVE TRADING SYSTEM (ATS) MARKET CENTERS TOGETHER ON ITS PUBLICLY AVAILABLE MONTHLY REPORTS RATHER THAN IN SEPARATE REPORTS FOR EACH MARKET CENTER, AND CLASSIFIED ITS ATS MARKET CENTER EXECUTIONS AS "AWAY EXECUTED SHARES" IN THAT REPORT. AS A RESULT OF THE COMBINED REPORT, THE FIRM INACCURATELY CATEGORIZED CERTAIN MID-POINT PEG IMMEDIATE OR CANCEL ORDERS IN ORDER TYPE CATEGORIES OTHER THAN THE INSIDE-THE-QUOTE ORDER TYPE CATEGORY, AND CERTAIN IMMEDIATE OR CANCEL ORDERS WITHIN THE MARKET ORDER TYPE CATEGORY RATHER THAN THE MARKETABLE LIMIT ORDER TYPE CATEGORY. THE FIRM LATER IMPLEMENTED A SEPARATE STAND-ALONE REPORT FOR ITS ATS MARKET CENTER THAT PREVENTS THESE TYPES OF ISSUES FROM RECURRING. MOREOVER, VARIOUS TECHNOLOGICAL ISSUES CAUSED THE FIRM TO PUBLISH INACCURATE REPORTS FOR ITS BROKER-DEALER



MARKET CENTER. FIRST, THE FIRM MISCLASSIFIED ORDERS BASED ON INACCURATE ORDER QUANTITIES THAT DID NOT REFLECT A REDUCTION FOR PRIOR EXECUTIONS. SECOND, THE FIRM DID NOT PROPERLY ATTRIBUTE EXECUTIONS TO THE CORRECT CANCELED-AND-REPLACED ORDER, MISCLASSIFIED ORDERS USING INCORRECT QUOTATIONS WITHIN THE SAME SECOND, AND MISCLASSIFIED SOME INSIDE-THE-QUOTE ORDERS AS AT-THE-QUOTE ORDERS. THIRD, THE FIRM EXCLUDED CERTAIN REPORTABLE EXECUTIONS FROM THE BROKER-DEALER MARKET CENTER REPORT. FINALLY, THREE INACCURACIES OCCURRED WITHIN THE FIRM'S NEW, STAND-ALONE ATS MARKET CENTER REPORT. THESE INACCURACIES WERE THE RESULT OF CODING ERRORS THAT CAUSED THE FIRM TO EXCLUDE CERTAIN REPORTABLE, EXECUTED ORDERS FROM THE ATS MARKET CENTER REPORT. IN TOTAL, THE FIRM PUBLISHED 107 INACCURATE MONTHLY REPORTS. THE FINDINGS ALSO STATED THAT THE FIRM'S SUPERVISORY SYSTEM WAS NOT REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RULE 605 OF REGULATION NMS. THE FIRM HAD NO SYSTEM TO CHECK THE ACCURACY OF THE ORDER EXECUTIONS IT REPORTED ON ITS RULE 605 REPORT. ALTHOUGH THE FIRM IMPLEMENTED SURVEILLANCES TO CHECK THE ACCURACY OF PARTICULAR ASPECTS OF ITS RULE 605 REPORTS, IT WAS NOT UNTIL OVER SIX MONTHS LATER THAT THE FIRM IMPLEMENTED A SYSTEM THAT CHECKS FOR A BROADER SET OF INCONSISTENCIES AND POTENTIALLY MISSING INFORMATION.

Initiated By: FINRA

Date Initiated: 07/15/2022

Docket/Case Number: [2019061061701](#)

Principal Product Type: Other

Other Product Type(s): UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 07/15/2022

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



Sanctions Ordered: Censure
Monetary/Fine \$325,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$325,000. FINE PAID IN FULL ON JULY 20, 2022.

Reporting Source: Firm

Current Status: Final

Allegations: THE FINANCIAL INDUSTRY REGULATORY AUTHORITY ALLEGED THAT BOFA SECURITIES, INC. (THE FIRM) PUBLISHED INACCURATE DATA IN CERTAIN MONTHLY REPORTS IT WAS REQUIRED TO PUBLISH PURSUANT TO RULE 605 OF REGULATION NMS BETWEEN JANUARY 2014 AND FEBRUARY 2022, IN VIOLATION OF SEC RULE 605 AND FINRA RULE 2010; AND FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH SEC RULE 605 BETWEEN JANUARY 2014 AND NOVEMBER 2021, IN VIOLATION OF NASD RULE 3010 AND FINRA RULES 3110 AND 2010.

Initiated By: FINANCIAL INDUSTRY REGULATORY AUTHORITY

Date Initiated: 07/15/2022

Docket/Case Number: [2019061061701](#)

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: Acceptance, Waiver & Consent(AWC)

Resolution Date: 07/15/2022

Sanctions Ordered: Censure
Monetary/Fine \$325,000.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM AGREED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$325,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE



TERMS OF THE ORDER.

Firm Statement

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM AGREED TO THE IMPOSITION OF A CENSURE AND A FINE IN THE AMOUNT OF \$325,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER.

Disclosure 61 of 69

Reporting Source: Firm

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE RULE VIOLATIONS UPON WHICH THE PENALTY IS BASED, THE CHICAGO BOARD OF TRADE CLEARING HOUSE RISK COMMITTEE ("COMMITTEE") FOUND THAT BOFA SECURITIES, INC. ("THE FIRM") VIOLATED CBOT RULES 930.E.1., 930.E.2., 930.E.3., 930.F., AND 971.A.

Initiated By: CHICAGO BOARD OF TRADE

Date Initiated: 03/18/2022

Docket/Case Number: 22-CH-2201

Principal Product Type: Other

Other Product Type(s): PERFORMANCE BONDS

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

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 03/18/2022

Sanctions Ordered: Monetary/Fine \$100,000.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THE RULE VIOLATIONS UPON WHICH THE PENALTY IS BASED, THE COMMITTEE ORDERED THE FIRM TO PAY A \$100,000 FINE.

Firm Statement

WITHOUT ADMITTING OR DENYING THE RULE VIOLATIONS UPON WHICH THE PENALTY IS BASED, THE COMMITTEE ORDERED THE FIRM TO PAY A \$100,000 FINE.



Disclosure 62 of 69

Reporting Source:	Regulator
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT VIOLATED NYSE RULE 3110(A) AND (B) (SUPERVISION) BY FAILING TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM AND WRITTEN SUPERVISORY PROCEDURES (WSPS) REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH NYSE RULE 122. THE FINDINGS STATED THAT BECAUSE OF THE SERVICES PROVIDED BY THE FIRM, INCLUDING THE FIRM'S FLOOR BROKER OPERATION, THE FIRM HAD THE SUPERVISORY OBLIGATION TO IMPLEMENT AND MAINTAIN A REASONABLY DESIGNED SUPERVISORY SYSTEM TO DETECT AND PREVENT ROUTING POTENTIALLY COMPETING ORDERS FOR THE SAME PRINCIPAL TO TWO DIFFERENT FLOOR BROKERS. THOUGH THE FIRM, INCLUDING ITS OWN FLOOR BROKERS, WERE COGNIZANT OF NYSE RULE 122, THE FIRM DID NOT MAINTAIN WSPS ADDRESSING NYSE RULE 122 (OR SUPERVISORY REVIEWS SPECIFICALLY RELATED TO COMPLIANCE WITH THE RULE).
Initiated By:	NEW YORK STOCK EXCHANGE
Date Initiated:	07/21/2021
Docket/Case Number:	2019-07-00074
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	08/02/2021
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$25,000.00

**Other Sanctions Ordered:**

Sanction Details: THE FIRM WAS CENSURED AND FINED \$25,000, JOINTLY AND SEVERALLY.

Reporting Source: Firm

Current Status: Final

Allegations: THE NEW YORK STOCK EXCHANGE LLC ("NYSE") ALLEGED THAT MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED (MLPFS) AND BOFA SECURITIES, INC. (BOFAS) (1) ROUTED TWO COMPETING PARENT ORDERS ON BEHALF OF TWO DIFFERENT PORTFOLIOS MANAGED BY THE SAME ADVISOR TO TWO DIFFERENT FLOOR BROKER FIRMS, RESULTING IN EXECUTIONS AT THE SAME TIME AND PRICE OF ORDERS ON BEHALF OF THE SAME CUSTOMERS BY TWO FLOOR BROKERS IN VIOLATION (UNINTENTIONALLY) OF NYSE RULE 122, AND (2) FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM AND WRITTEN SUPERVISORY PROCEDURES REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH NYSE RULE 122 IN VIOLATION OF NYSE RULE 3110(A) AND (B).

Initiated By: NEW YORK STOCK EXCHANGE LLC

Date Initiated: 07/21/2021

Docket/Case Number: NO. 2019-07-00074

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: CENSURE

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 08/02/2021

Sanctions Ordered: Censure
Monetary/Fine \$25,000.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, MLPFS AND BOFAS AGREED TO THE IMPOSITION OF A CENSURE AND FINE IN THE AMOUNT OF \$25,000, ALLOCATED JOINTLY AND SEVERALLY BETWEEN MLPFS AND BOFAS. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC.



Firm Statement WITHOUT ADMITTING OR DENYING THE FINDINGS, MLPFS AND BOFAS AGREED TO THE IMPOSITION OF A CENSURE AND FINE IN THE AMOUNT OF \$25,000, ALLOCATED JOINTLY AND SEVERALLY BETWEEN MLPFS AND BOFAS. THE FINE WAS PAID IN ACCORDANCE WITH THE TERMS OF THE AWC.

Disclosure 63 of 69

Reporting Source: Firm

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, THE CHICAGO BOARD OF TRADE CLEARING HOUSE RISK COMMITTEE ("COMMITTEE") FOUND THAT BOFA SECURITIES, INC. VIOLATED CBOT RULES 930.E.1., 930.E.2., 930.E.3., 930.F., AND 971.A.

Initiated By: CHICAGO BOARD OF TRADE

Date Initiated: 06/11/2021

Docket/Case Number: CBOT 21-CH-2102

Principal Product Type: Other

Other Product Type(s): PERFORMANCE BONDS

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

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 06/11/2021

Sanctions Ordered: Monetary/Fine \$75,000.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, THE COMMITTEE ORDERED THE FIRM TO PAY A \$75,000 FINE.

Firm Statement WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, THE COMMITTEE ORDERED THE FIRM TO PAY A \$75,000 FINE.

Disclosure 64 of 69



Reporting Source:	Firm
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION OR FACTUAL FINDINGS UPON WHICH THE PENALTY IS BASED, A PANEL OF THE CHICAGO BOARD OF TRADE BUSINESS CONDUCT COMMITTEE ("COMMITTEE") FOUND THAT, ON TWO DATES, BOFA SECURITIES, INC. ("THE FIRM") EXECUTED CERTAIN EXCHANGE FOR RELATED POSITION ("EFRP") TRANSACTIONS THAT WERE CONTINGENT UPON THE EXECUTION OF OTHER EFRP TRANSACTIONS AND THAT THE FIRM EXECUTED THESE TRANSACTIONS SIMULTANEOUSLY AND WITHOUT INCURRING MATERIAL RISK, IN VIOLATION OF CBOT RULE 538.C.
Initiated By:	CHICAGO BOARD OF TRADE
Date Initiated:	05/20/2021
Docket/Case Number:	CBOT 20-1343-BC-2
Principal Product Type:	Other
Other Product Type(s):	EXCHANGE FOR RELATED POSITIONS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	05/20/2021
Sanctions Ordered:	Monetary/Fine \$55,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION OR FACTUAL FINDINGS UPON WHICH THE PENALTY IS BASED, THE COMMITTEE ISSUED A NOTICE OF DISCIPLINARY ACTION AND ORDERED THE FIRM TO PAY A \$55,000 FINE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION OR FACTUAL FINDINGS UPON WHICH THE PENALTY IS BASED, THE COMMITTEE ISSUED A NOTICE OF DISCIPLINARY ACTION AND ORDERED THE FIRM TO PAY A \$55,000 FINE.

Disclosure 65 of 69

Reporting Source: Firm



Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, THE CLEARING HOUSE RISK COMMITTEE ("COMMITTEE") FOUND THAT THE FIRM VIOLATED CBOT RULE 971.A.
Initiated By:	CHICAGO BOARD OF TRADE
Date Initiated:	10/16/2020
Docket/Case Number:	20-CH-2012
Principal Product Type:	Other
Other Product Type(s):	GOVERNMENT MONEY MARKET FUNDS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	10/16/2020
Sanctions Ordered:	Monetary/Fine \$75,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, THE COMMITTEE IMPOSED A \$75,000 FINE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, THE COMMITTEE IMPOSED A \$75,000 FINE.

Disclosure 66 of 69

Reporting Source:	Regulator
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT IMPROPERLY CANCELLED MARKET-ON-CLOSE (MOC) AND LIMIT-ON-CLOSE (LOC) ORDERS AFTER THE PRESCRIBED CUT-OFF TIME ON SEPARATE TRADE DATES, WHEN CANCELLATIONS ARE ONLY PERMITTED TO CORRECT LEGITIMATE ERRORS. THE FINDINGS STATED THAT THE FIRM FAILED TO IMPLEMENT ADEQUATE SUPERVISORY SYSTEMS AND CONTROLS REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH NYSE RULE 123C(3) AND NYSE RULE 7.35B(F)(2). THE FIRM EXPERIENCED AN ISSUE WHERE A CUSTOMER, UTILIZING AN EXTERNAL DIRECT MARKET



ACCESS (DMA) TRADING PLATFORM OFFERED BY THE FIRM, ENTERED IMPROPERLY FORMATTED CANCELLATION MESSAGES. THOUGH INADVERTENT, THE ISSUE CAUSED THE MIS-FORMATTED MESSAGES TO BYPASS THE PLATFORM'S BUILT-IN CONTROLS DESIGNED TO PREVENT IMPROPER MOC/LOC/CO CANCELLATIONS AFTER THE PRESCRIBED CUT-OFF TIME. FURTHER, THE FIRM DID NOT APPLY THESE CONTROLS WITHIN THE EXTERNAL DMA TRADING PLATFORM TO ORDERS DIRECTED TO NYSE UTILIZING PILLAR PROTOCOLS. THE FIRM'S SURVEILLANCE ALSO FAILED TO CAPTURE THE IMPROPER MOC/LOC CANCELLATIONS EFFECTED USING THE NYSE PILLAR PROTOCOL DUE TO THE EXCLUSION OF NEW ORDER TAGGING DESIGNATIONS, USED TO IDENTIFY MOC/LOC ORDERS, FROM THE FIRM'S MOC/LOC SURVEILLANCE REPORT LOGIC. HAD THE FIRM'S SURVEILLANCE BEEN ABLE TO CAPTURE THESE CANCELLATIONS, THE FIRM MAY HAVE LEARNED THAT THE BUILT-IN CONTROLS WITHIN THE EXTERNAL DMA TRADING PLATFORM HAD NOT BEEN APPLIED TO SUCH ORDERS SOONER. THE FIRM ALSO DID NOT PERFORM CONSISTENT REVIEWS OF ITS MOC/LOC SUPERVISORY REPORTS COVERING EXTERNAL DMA TRADING PLATFORMS. THE FIRM GENERATED TWO DIFFERENT MOC/LOC SUPERVISORY REPORTS COVERING EXTERNAL DMA TRADING PLATFORMS, WITH ONE INTENDED TO REPLACE THE OTHER. HOWEVER, NEITHER REPORT WAS CONSISTENTLY REVIEWED DUE TO ISSUES IMPACTING THE EFFICACY OF BOTH REPORTS AND INADVERTENT MISCOMMUNICATION CONCERNING THE AVAILABILITY OF THE NEW REPORT. ADDITIONALLY, THE FIRM'S WRITTEN SUPERVISORY PROCEDURES ("WSPS") FAILED TO ADDRESS SHORTENED TRADING DAYS AND REFERENCED AN OUTDATED CUT-OFF TIME ON NYSE.

Initiated By: NEW YORK STOCK EXCHANGE

Date Initiated: 10/26/2020

Docket/Case Number: 2019-05-00077 & 2019-12-00056

Principal Product Type: Other

Other Product Type(s): UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/26/2020



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?

No

Sanctions Ordered:

Censure

Monetary/Fine \$25,000.00

Other Sanctions Ordered:

Sanction Details:

THE FIRM WAS CENSURED AND FINED \$25,000.

Reporting Source:

Firm

Current Status:

Final

Allegations:

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT VIOLATED NYSE RULE 123C(3) AND ITS SUCCESSOR RULE, NYSE RULE 7.35B(F)(2), BY IMPROPERLY CANCELLING CERTAIN MARKET-ON-CLOSE (MOC) AND LIMIT-ON-CLOSE (LOC) ORDERS AFTER THE PRESCRIBED CUT-OFF TIME ON SEPARATE TRADE DATES, WHEN CANCELLATIONS ARE ONLY PERMITTED TO CORRECT LEGITIMATE ERRORS. THE NYSE FOUND THAT THE FIRM ALSO VIOLATED NYSE RULE 3110 BY FAILING TO IMPLEMENT ADEQUATE SUPERVISORY SYSTEMS AND CONTROLS REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH NYSE RULE 123C(3) AND NYSE RULE 7.35B(F)(2).

Initiated By:

NEW YORK STOCK EXCHANGE LLC

Date Initiated:

10/26/2020

Docket/Case Number:

2019-05-00077 & 2019-12-00056

Principal Product Type:

Other

Other Product Type(s):

UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief Sought:

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

CENSURE

Resolution:

Acceptance, Waiver & Consent(AWC)

Resolution Date:

10/26/2020

Sanctions Ordered:

Censure



	Monetary/Fine \$25,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM WAS CENSURED AND FINED \$25,000.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM WAS CENSURED AND FINED \$25,000.

Disclosure 67 of 69

Reporting Source:	Firm
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, THE CLEARING HOUSE RISK COMMITTEE ("COMMITTEE") FOUND THAT THE FIRM VIOLATED CBOT RULE 971.A. AND 971.A.3.
Initiated By:	CHICAGO BOARD OF TRADE
Date Initiated:	08/21/2020
Docket/Case Number:	20-CH-2002
Principal Product Type:	Other
Other Product Type(s):	SWAPS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	08/21/2020
Sanctions Ordered:	Monetary/Fine \$50,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, THE COMMITTEE IMPOSED A \$50,000 FINE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, THE COMMITTEE IMPOSED A \$50,000 FINE.

Disclosure 68 of 69



Reporting Source: Firm

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, THE CLEARING HOUSE RISK COMMITTEE ("COMMITTEE") FOUND THAT THE FIRM VIOLATED CBOT RULE 971.A.1.

Initiated By: CHICAGO BOARD OF TRADE

Date Initiated: 08/21/2020

Docket/Case Number: 20-CH-2003

Principal Product Type: Other

Other Product Type(s): SWAPS

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

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 08/21/2020

Sanctions Ordered: Monetary/Fine \$100,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, THE COMMITTEE IMPOSED A \$100,000 FINE.

Firm Statement WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, THE COMMITTEE IMPOSED A \$100,000 FINE.

Disclosure 69 of 69

Reporting Source: Firm

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, THE CLEARING HOUSE RISK COMMITTEE ("COMMITTEE") FOUND THAT THE FIRM VIOLATED CBOT RULE 971.E.

Initiated By: CHICAGO BOARD OF TRADE

Date Initiated: 06/12/2020

Docket/Case Number: 20-CH-2001



Principal Product Type:	Other
Other Product Type(s):	SWAPS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	06/12/2020
Sanctions Ordered:	Monetary/Fine \$50,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, THE COMMITTEE IMPOSED A \$50,000 FINE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE PENALTY IS BASED, THE COMMITTEE IMPOSED A \$50,000 FINE.

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	170	1
Criminal	0	1	0
Civil Event	0	9	0



Disclosure Event Details

Regulatory - Final

Disclosure 1 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE SHANGHAI BRANCH OF THE CHINA STATE ADMINISTRATION OF FOREIGN EXCHANGE ("SAFE") ISSUED AN ADMINISTRATIVE PENALTY NOTICE AGAINST BANK OF AMERICA, NATIONAL ASSOCIATION ("BANA") FOR CONDUCTING PROFIT REMITTANCE BUSINESS IN VIOLATION OF SAFE REGULATIONS, FAILING TO COMPLY WITH SAFE REGULATIONS IN HANDLING OFFSHORE RESALE TRANSACTIONS, FAILING TO CONDUCT DUE DILIGENCE IN HANDLING BUSINESS UNDER ADVANCE PAYMENT, FAILING TO CONDUCT DUE DILIGENCE IN HANDLING FUND RECEIPTS AND PAYMENTS UNDER GOODS TRADE, ENGAGING IN INTERBANK MARKET TRANSACTIONS IN VIOLATION OF SAFE REGULATIONS, AND FAILING TO SUBMIT STATISTICAL REPORTS AND RELATED MATERIALS IN ACCORDANCE WITH REGULATIONS, IN VIOLATION OF CERTAIN FOREIGN EXCHANGE ADMINISTRATION LAWS.
Initiated By:	SHANGHAI BRANCH OF THE STATE ADMINISTRATION OF FOREIGN EXCHANGE
Date Initiated:	03/21/2025
Docket/Case Number:	SHANGHAI HUI GUAN FA ZI [2025] NO. 4
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:	Decision
Resolution Date:	03/21/2025
Sanctions Ordered:	Monetary/Fine \$380,237.00
Other Sanctions Ordered:	WARNING; CONFISCATION OF ILLEGAL GAINS
Sanction Details:	SAFE IMPOSED A WARNING AND PENALTY IN THE AMOUNT OF RMB



2,757,400 (APPROXIMATELY USD 380,237) ON BANA AND CONFISCATED ALL GAINS RELATED TO THE ALLEGED VIOLATIONS.

Firm Statement

SAFE IMPOSED A WARNING AND PENALTY IN THE AMOUNT OF RMB 2,757,400 (APPROXIMATELY USD 380,237) ON BANA AND CONFISCATED ALL GAINS RELATED TO THE ALLEGED VIOLATIONS.

Disclosure 2 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	BLOOMBERG SEF LLC ("BLOOMBERG SEF") ALLEGED THAT BANK OF AMERICA, NATIONAL ASSOCIATION ("THE FIRM") FAILED TO USE EITHER TICKET NOTIFICATION OR VOICE NOTIFICATION TO PROVIDE NOTICE TO BLOOMBERG SEF'S COMPLIANCE DEPARTMENT OF THE EXECUTION OF AN OFFSETTING TRADE AND/OR CORRECTING TRADE, IN VIOLATION OF BLOOMBERG SEF RULE 516.
Initiated By:	BLOOMBERG SEF LLC
Date Initiated:	09/03/2025
Docket/Case Number:	N/A
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	09/03/2025
Sanctions Ordered:	Monetary/Fine \$5,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH THE NOTICE OF FINE IS BASED, THE FIRM WAS ORDERED TO PAY A \$5,000 FINE. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE NOTICE OF FINE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION UPON WHICH



THE NOTICE OF FINE IS BASED, THE FIRM WAS ORDERED TO PAY A \$5,000 FINE. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE NOTICE OF FINE.

Disclosure 3 of 170

Reporting Source:	Firm
Affiliate:	DSP MERRILL LYNCH LTD.
Current Status:	Final
Allegations:	THE SECURITIES AND EXCHANGE BOARD OF INDIA ("SEBI") ALLEGED DSP MERRILL LYNCH LTD. (DSPML) HAD NOT EXERCISED DUE DILIGENCE WITH REFERENCE TO CERTAIN DISCLOSURES IN OFFER DOCUMENTS; HAD NOT EXERCISED DUE DILIGENCE WITH REFERENCE TO DISCLOSURES PERTAINING TO ALLOCATION OF SHARES TO QIBS; DID NOT MAKE ADEQUATE DISCLOSURES WHILE PROVIDING BIDDING FACILITIES THROUGH ALTERNATE MODES; HAD FAILED TO FULFILL THEIR OBLIGATIONS IN A PROFESSIONAL AND DILIGENT MANNER; HAD FAILED IN THEIR ASSIGNED DUTIES AS POST-ISSUE LEAD MANAGER TO THE PUBLIC ISSUES AND HAD NOT PROPERLY MONITORED THE FLOW OF APPLICATIONS AND OTHER MATTERS PURSUANT TO CLOSURE OF PUBLIC ISSUES IN VIOLATION OF CERTAIN PROVISIONS OF THE SEBI (MERCHANT BANKERS) REGULATIONS, 1992 AND SEBI (DISCLOSURE & INVESTOR PROTECTION) GUIDELINES, 2000 ISSUED UNDER THE SEBI ACT.
Initiated By:	SECURITIES AND EXCHANGE BOARD OF INDIA
Date Initiated:	01/12/2010
Docket/Case Number:	SEBI REGN. NO. INM000002236
Principal Product Type:	Other
Other Product Type(s):	DISCLOSURES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	01/12/2010
Sanctions Ordered:	Monetary/Fine \$67,100.00
Other Sanctions Ordered:	



Sanction Details:	WITHOUT ADMITTING OR DENYING GUILT AS TO THE FINDINGS OF FACT OR CONCLUSIONS OF LAW, DSPML AGREED TO PAY INR 30,50,000 (APPROXIMATELY USD 67,100) TOWARDS THE SETTLEMENT TERMS.
Firm Statement	WITHOUT ADMITTING OR DENYING GUILT AS TO THE FINDINGS OF FACT OR CONCLUSIONS OF LAW, DSPML AGREED TO PAY INR 30,50,000 (APPROXIMATELY USD 67,100) TOWARDS THE SETTLEMENT TERMS.

Disclosure 4 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR AGRICULTURE, FISHERIES AND RURAL DEVELOPMENT (AFRD) FOR THE QUARTERS ENDED 3-31-2023 THROUGH 6-30-2023.
Initiated By:	BANGKO SENTRAL NG PILIPINAS
Date Initiated:	05/07/2025
Docket/Case Number:	REF. NO DSA-2024-06-0183B-DSA-L-BA-FBL
Principal Product Type:	Other
Other Product Type(s):	BANK LOANS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	05/07/2025
Sanctions Ordered:	Monetary/Fine \$15,386.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP852,673. 62(APPROXIMATELY USD15,386) ON BANA. THE PENALTY AMOUNT WAS REDUCED TO ACCOUNT FOR BANA'S PENALTY AMOUNT BEING OVER-



ASSESSED IN CONNECTION WITH A PRIOR LETTER. THE PAYMENT WILL BE MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Firm Statement

THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP852,673.62 (APPROXIMATELY USD15,386) ON BANA. THE PENALTY AMOUNT WAS REDUCED TO ACCOUNT FOR BANA'S PENALTY AMOUNT BEING OVER-ASSESSED IN CONNECTION WITH A PRIOR LETTER. THE PAYMENT WILL BE MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Disclosure 5 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	ON FEBRUARY 26, 2025, THE SECURITIES AND FUTURES COMMISSION OF SOUTH KOREA ("SFC") IMPOSED AN ADMINISTRATIVE PENALTY AND ADMINISTRATIVE FINE ON MERRILL LYNCH INTERNATIONAL ("MLI") FOR PLACING CERTAIN SHORT SELL ORDERS FOR SHARES OF STOCK WHICH MLI DID NOT OWN, IN VIOLATION OF SHORT SALE REGULATIONS UNDER ARTICLE 180(1) OF THE FINANCIAL INVESTMENT SERVICES AND CAPITAL MARKETS ACT OF SOUTH KOREA.
Initiated By:	SECURITIES AND FUTURES COMMISSION OF SOUTH KOREA
Date Initiated:	02/26/2025
Docket/Case Number:	N/A
Principal Product Type:	Other
Other Product Type(s):	SHORT SALES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	02/26/2025
Sanctions Ordered:	Monetary/Fine \$1,508,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	SFC IMPOSED A TOTAL PENALTY, CONSISTING OF AN ADMINISTRATIVE PENALTY AND ADMINISTRATIVE FINE, OF KRW 2,223,200,000 (APPROXIMATELY USD 1,536,000) ON MLI, WHICH WAS REDUCED TO KRW



2,182,400,000 (APPROXIMATELY USD 1,508,000) BECAUSE MLI PAID THE FINE PRIOR TO MARCH 19, 2025.

Firm Statement

SFC IMPOSED A TOTAL PENALTY, CONSISTING OF AN ADMINISTRATIVE PENALTY AND ADMINISTRATIVE FINE, OF KRW 2,223,200,000 (APPROXIMATELY USD 1,536,000) ON MLI, WHICH WAS REDUCED TO KRW 2,182,400,000 (APPROXIMATELY USD 1,508,000) BECAUSE MLI PAID THE FINE PRIOR TO MARCH 19, 2025.

Disclosure 6 of 170

Reporting Source: Firm

Affiliate: BANK OF AMERICA, NATIONAL ASSOCIATION

Current Status: Final

Allegations: THE OFFICE OF THE COMPTROLLER OF THE CURRENCY (OCC) ALLEGED THAT BANK OF AMERICA, NATIONAL ASSOCIATION (THE FIRM) (1) FAILED TO DEVELOP AND PROVIDE FOR THE CONTINUED ADMINISTRATION OF A PROGRAM REASONABLY DESIGNED TO ASSURE AND MONITOR BANK SECRECY ACT (BSA) COMPLIANCE, IN VIOLATION OF 12 C.F.R. § 21.21, (2) HAD A BREAKDOWN IN ITS POLICIES, PROCEDURES, AND PROCESSES TO IDENTIFY, EVALUATE, AND REPORT SUSPICIOUS ACTIVITY, RESULTING IN VIOLATIONS OF THE FIRM'S OBLIGATION TO FILE SUSPICIOUS ACTIVITY REPORTS UNDER 12 C.F.R. § 21.11, (3) FAILED TO MAKE ACCEPTABLE SUBSTANTIAL PROGRESS TOWARDS CORRECTING A DEFICIENCY RELATED TO THE BANK'S CUSTOMER DUE DILIGENCE PROCESSES PREVIOUSLY REPORTED TO THE FIRM BY THE OCC, AND (4) ENGAGED IN UNSAFE OR UNSOUND PRACTICES RELATED TO ITS COMPLIANCE WITH THE BSA AND ALL RELEVANT SANCTIONS LAWS, RULES, AND REGULATIONS, INCLUDING THE RULES AND REGULATIONS OF THE OFFICE OF FOREIGN ASSETS CONTROL AND RELEVANT EXECUTIVE ORDERS, BSA COMPLIANCE PROGRAM, INCLUDING INTERNAL CONTROLS, GOVERNANCE, TRANSACTION MONITORING AND MODELS, SUSPICIOUS ACTIVITY MONITORING, INVESTIGATION, AND REPORTING, DUE DILIGENCE, RISK ASSESSMENTS, BSA OFFICER, STAFFING, INTERNAL AUDIT, AND TRAINING.

Initiated By: OFFICE OF THE COMPTROLLER OF THE CURRENCY

Date Initiated: 12/23/2024

Docket/Case Number: AA-ENF-2024-56

Principal Product Type: No Product

Other Product Type(s):



Principal Sanction(s)/Relief Sought:	Undertaking
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	12/23/2024
Sanctions Ordered:	
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS CONTAINED IN THE CONSENT ORDER, THE FIRM CONSENTED TO COMPLETE CERTAIN UNDERTAKINGS. THE FIRM WILL COMPLETE THE UNDERTAKINGS IN ACCORDANCE WITH THE TERMS OF THE CONSENT ORDER.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS CONTAINED IN THE CONSENT ORDER, THE FIRM CONSENTED TO COMPLETE CERTAIN UNDERTAKINGS. THE FIRM WILL COMPLETE THE UNDERTAKINGS IN ACCORDANCE WITH THE TERMS OF THE CONSENT ORDER.

Disclosure 7 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA YATIRIM BANK A.S.
Current Status:	Final
Allegations:	ON OCTOBER 3, 2024, BANK OF AMERICA YATIRIM BANK A.S. ("BAYB") WAS NOTIFIED THAT THE CAPITAL MARKETS BOARD OF TURKEY ("CMB") ISSUED AN ADMINISTRATIVE FINE TO BAYB, AND 52 OTHER FINANCIAL INSTITUTIONS, FOR VIOLATIONS OF DEPOT REQUIREMENT RULES.
Initiated By:	CAPITAL MARKETS BOARD OF TURKEY
Date Initiated:	10/03/2024
Docket/Case Number:	2024-50
Principal Product Type:	Equity Listed (Common & Preferred Stock)
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:	10/03/2024
Sanctions Ordered:	Monetary/Fine \$56,734.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE CMB ISSUED BAYB AN ADMINISTRATIVE FINE IN THE AMOUNT OF TRY 1,944,578 (APPROXIMATELY USD 56,734) ON OCTOBER 3, 2024. BAYB WILL PAY THE FINE AS DIRECTED.
Firm Statement	THE CMB ISSUED BAYB AN ADMINISTRATIVE FINE IN THE AMOUNT OF TRY 1,944,578 (APPROXIMATELY USD 56,734) ON OCTOBER 3, 2024. BAYB WILL PAY THE FINE AS DIRECTED.

Disclosure 8 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH COMMODITIES, INC.
Current Status:	Final
Allegations:	THE COMMODITY FUTURES TRADING COMMISSION ("CFTC") ENTERED INTO A SETTLEMENT ORDER ("ORDER") WITH MERRILL LYNCH COMMODITIES, INC. ("MLCI") TO SETTLE AN ADMINISTRATIVE ACTION THAT FOUND MLCI (A) HELD POSITIONS IN CERTAIN FIXED PRICE FUTURES CONTRACTS THAT VIOLATED FEDERAL SPOT-MONTH POSITION LIMITS AND DID NOT OTHERWISE MEET THE REQUIREMENTS FOR AN EXEMPTION FROM THE FEDERAL POSITION LIMITS PURSUANT TO CFTC REGULATIONS, IN VIOLATION OF SECTION 4A(B)(2) OF THE COMMODITY EXCHANGE ACT ("CEA") AND CFTC REGULATION 150.2; (B) EXCEEDED THE ICE FUTURES U.S.-SET SPOT-MONTH POSITION LIMIT IN CERTAIN FIXED PRICE FUTURES CONTRACTS AND DID NOT COMPLY WITH THE TERMS OF AN EXEMPTION THAT HAD BEEN GRANTED BY ICE FUTURES U.S., IN VIOLATION OF SECTION 4A(E) OF THE CEA; AND (C) DID NOT ESTABLISH AND ENFORCE WRITTEN POLICIES AND PROCEDURES REASONABLY DESIGNED TO MONITOR FOR AND PREVENT VIOLATIONS OF APPLICABLE FEDERAL, DESIGNATED CONTRACT MARKET, OR SWAP EXECUTION FACILITY POSITION LIMITS AND TO MONITOR FOR AND PREVENT IMPROPER RELIANCE UPON ANY EXEMPTION OR EXCLUSIONS FROM SUCH POSITION LIMITS, AND THEREBY DID NOT DILIGENTLY SUPERVISE ITS EMPLOYEES, IN VIOLATION OF SECTION 4S(H)(1)(B) AND (C) OF THE CEA AND CFTC REGULATIONS 23.601(A) AND 23.602(A).
Initiated By:	COMMODITY FUTURES TRADING COMMISSION
Date Initiated:	09/25/2024



Docket/Case Number:	CFTC DOCKET NO. 24-31
Principal Product Type:	Futures - Commodity
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	09/25/2024
Sanctions Ordered:	Monetary/Fine \$1,500,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	MCLI ADMITTED TO CERTAIN FACTS IN THE SETTLEMENT ORDER, ACKNOWLEDGED ITS CONDUCT VIOLATED CERTAIN PROVISIONS OF THE CEA AND CFTC REGULATIONS AND AGREED TO THE FOLLOWING SANCTIONS: (A) TO CEASE AND DESIST FROM VIOLATING SECTIONS 4A(B)(2) AND (E) AND 4S(H)(1)(B) AND (C) OF THE CEA AND CFTC REGULATIONS 23.601(A), 23.602(A), AND 150.2, (B) TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$1,500,000, AND (C) TO COMPLY WITH CERTAIN CONDITIONS AND UNDERTAKINGS.
Firm Statement	MCLI ADMITTED TO CERTAIN FACTS IN THE SETTLEMENT ORDER, ACKNOWLEDGED ITS CONDUCT VIOLATED CERTAIN PROVISIONS OF THE CEA AND CFTC REGULATIONS AND AGREED TO THE FOLLOWING SANCTIONS: (A) TO CEASE AND DESIST FROM VIOLATING SECTIONS 4A(B)(2) AND (E) AND 4S(H)(1)(B) AND (C) OF THE CEA AND CFTC REGULATIONS 23.601(A), 23.602(A), AND 150.2, (B) TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$1,500,000, AND (C) TO COMPLY WITH CERTAIN CONDITIONS AND UNDERTAKINGS.

Disclosure 9 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH COMMODITIES INC.
Current Status:	Final
Allegations:	ICE FUTURES U.S. ("ICE FUTURES") ALLEGED THAT MERRILL LYNCH COMMODITIES INC. ("MLCI") VIOLATED (1) ICE FUTURES RULES 6.20(B) AND 6.29(D) IN CONNECTION WITH HOLDING POSITIONS IN EXCESS OF THE



APPLICABLE SPOT MONTH POSITIONS LIMITS THAT DID NOT APPEAR TO COMPLY WITH THE TERMS OF AN EXEMPTION GRANTED BY THE EXCHANGE; (2) ICE FUTURES RULE 4.01(A) BY FAILING TO DILIGENTLY SUPERVISE THE ICE FUTURES-RELATED ACTIVITIES OF ITS EMPLOYEES; AND (3) ICE FUTURES RULE 4.01(B) BY FAILING TO ESTABLISH, ADMINISTER, AND ENFORCE SUPERVISORY SYSTEMS, POLICIES AND PROCEDURES REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH ICE FUTURES RULES GOVERNING THE USE OF EXEMPTIONS.

Initiated By:	ICE FUTURES U.S.
Date Initiated:	07/31/2024
Docket/Case Number:	CASE NO. 2023-016
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:	07/31/2024
Sanctions Ordered:	Monetary/Fine \$1,000,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGED RULE VIOLATIONS, MLCI AGREED TO PAY A MONETARY PENALTY OF \$1,000,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE NOTICE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGED RULE VIOLATIONS, MLCI AGREED TO PAY A MONETARY PENALTY OF \$1,000,000. THE FINE WILL BE PAID IN ACCORDANCE WITH THE NOTICE.

Disclosure 10 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	EFFECTIVE JULY 21, 2024, THE KOREAN FINANCIAL SERVICES COMMISSION ("FSC") IMPOSED AN ADMINISTRATIVE FINE ON MERRILL LYNCH INTERNATIONAL ("MLI") IN CONNECTION WITH ALLEGATIONS THAT



MLI VIOLATED NET SHORT POSITION REPORTING AND DISCLOSURE OBLIGATIONS UNDER ARTICLES 180-2, PARAGRAPH 1 AND ARTICLE 180-3, PARAGRAPH 1 OF THE FINANCIAL INVESTMENT SERVICES AND CAPITAL MARKETS ACT (THE "FSCMA").

Initiated By: FINANCIAL SERVICES COMMISSION (KOREA)

Date Initiated: 07/21/2024

Docket/Case Number: N/A

Principal Product Type: Equity Listed (Common & Preferred Stock)

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: 07/21/2024

Sanctions Ordered: Monetary/Fine \$33,308.00

Other Sanctions Ordered:

Sanction Details: FSC IMPOSED AN ADMINISTRATIVE FINE OF KRW 57 MILLION (APPROXIMATELY USD 41,635) ON MLI, WHICH WAS REDUCED TO KRW 45.6 MILLION (APPROXIMATELY USD 33,308) BECAUSE MLI PAID THE FINE PRIOR TO JULY 21, 2024.

Firm Statement FSC IMPOSED AN ADMINISTRATIVE FINE OF KRW 57 MILLION (APPROXIMATELY USD 41,635) ON MLI, WHICH WAS REDUCED TO KRW 45.6 MILLION (APPROXIMATELY USD 33,308) BECAUSE MLI PAID THE FINE PRIOR TO JULY 21, 2024.

Disclosure 11 of 170

Reporting Source: Firm

Affiliate: BANK OF AMERICA MALAYSIA BERHAD

Current Status: Final

Allegations: BANK NEGARA MALAYSIA (BNM) IMPOSED AN ADMINISTRATIVE MONETARY PENALTY ON BANK OF AMERICA MALAYSIA BERHAD (THE FIRM), AS WELL AS THIRTEEN OTHER FINANCIAL INSTITUTIONS, FOR ALLEGED FAILURES TO COMPLY WITH SECTIONS 143(3)(B) AND 143(4) OF THE FINANCIAL SERVICES ACT 2013, SECTIONS 155(3)(B) AND 155(4) OF THE ISLAMIC



FINANCIAL SERVICES ACT 2013, AND CERTAIN BNM POLICY DOCUMENTS
IN CONNECTION WITH LATE, INCOMPLETE AND/OR INACCURATE
SUBMISSIONS OF CERTAIN DATA TO BNM.

Initiated By: BANK NEGARA MALAYSIA

Date Initiated: 05/06/2024

Docket/Case Number: BNM/JPKP/EAD/313/12/2023

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: Other

Resolution Date: 05/06/2024

Sanctions Ordered: Monetary/Fine \$127,116.00

Other Sanctions Ordered:

Sanction Details: BNM IMPOSED AN ADMINISTRATIVE MONETARY PENALTY IN THE AMOUNT OF RM600,000 (APPROXIMATELY USD127,116) ON THE FIRM. THE ADMINISTRATIVE MONETARY PENALTY WAS PAID AS DIRECTED.

Firm Statement BNM IMPOSED AN ADMINISTRATIVE MONETARY PENALTY IN THE AMOUNT OF RM600,000 (APPROXIMATELY USD127,116) ON THE FIRM. THE ADMINISTRATIVE MONETARY PENALTY WAS PAID AS DIRECTED.

Disclosure 12 of 170

Reporting Source: Firm

Affiliate: BOFA SECURITIES EUROPE SA

Current Status: Final

Allegations: ON APRIL 2, 2024, BOFA SECURITIES EUROPE SA ("BOFA") WAS NOTIFIED THAT EUREX DEUTSCHLAND ("EUREX") ISSUED A DECISION ALLEGING THAT BOFA SUBMITTED ORDERS WITH INCORRECT ENTRIES IN CERTAIN FIELDS THAT ARE REQUIRED WHEN USING A TRADING ALGORITHM, DUE TO A TECHNICAL ERROR WITH THE CONFIGURATION OF THE SOFTWARE, IN VIOLATION OF EUREX RULES.

Initiated By: EUREX DEUTSCHLAND



Date Initiated: 04/02/2024

Docket/Case Number: Z 2023/22

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Reprimand

Other Sanction(s)/Relief Sought:

Resolution: Decision

Resolution Date: 04/02/2024

Sanctions Ordered:

Other Sanctions Ordered: REPRIMAND, COSTS OF THE PROCEEDING

Sanction Details: IN CONNECTION WITH THE DECISION, THE EUREX REPRIMANDED BOFASE AND ORDERED BOFASE TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1085).

Firm Statement IN CONNECTION WITH THE DECISION, THE EUREX REPRIMANDED BOFASE AND ORDERED BOFASE TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1085).

Disclosure 13 of 170

Reporting Source: Firm

Affiliate: BANK OF AMERICA, NATIONAL ASSOCIATION

Current Status: Final

Allegations: THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR CERTAIN REPORTING VIOLATIONS BETWEEN MARCH 31, 2022 AND SEPTEMBER 30, 2022.

Initiated By: BANGKO SENTRAL NG PILIPINAS

Date Initiated: 02/05/2024

Docket/Case Number: REF. NO DSA-2023-05-0192G-DSA-L-BA

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:	Other
Resolution Date:	02/05/2024
Sanctions Ordered:	Monetary/Fine \$877.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP49,200.00 (APPROXIMATELY USD877) ON BANA. THE PAYMENT WILL BE MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.
Firm Statement	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP49,200.00 (APPROXIMATELY USD877) ON BANA. THE PAYMENT WILL BE MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Disclosure 14 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR AGRICULTURE, FISHERIES AND RURAL DEVELOPMENT (AFRD) FOR THE QUARTERS ENDED 9-30-2022 THROUGH 12-31-2022.
Initiated By:	BANGKO SENTRAL NG PILIPINAS
Date Initiated:	01/22/2024
Docket/Case Number:	REF. NO DSA-2024-01-0136AA-DSA-L-BA
Principal Product Type:	Other
Other Product Type(s):	BANK LOANS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	



Resolution:	Other
Resolution Date:	01/22/2024
Sanctions Ordered:	Monetary/Fine \$59,030.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP3,309,740.78 (APPROXIMATELY USD59,030) ON BANA. THE PAYMENT WILL BE MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.
Firm Statement	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP3,309,740.78 (APPROXIMATELY USD59,030) ON BANA. THE PAYMENT WILL BE MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Disclosure 15 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH EQUITIES (AUSTRALIA) LIMITED
Current Status:	Final
Allegations:	ON JANUARY 23, 2024, THE AUSTRALIAN SECURITIES EXCHANGE LTD (ASX) PUBLISHED A DISCIPLINARY NOTICE ALLEGING THAT MERRILL LYNCH EQUITIES (AUSTRALIA) LIMITED (MLEAL) DID NOT COMPLY WITH ASX SETTLEMENT OPERATING RULE 6.8A.5(A), (B) AND (C) IN CONNECTION WITH FAILURES TO ACCURATELY REPORT ITS SECURITIES ON LOAN AND SECURITIES BORROWED POSITIONS BY THE PRESCRIBED TIME AND ITS SECURITIES COMMITTED POSITION BY THE PRESCRIBED DATE AND TIME.
Initiated By:	AUSTRALIAN SECURITIES EXCHANGE LTD
Date Initiated:	01/23/2024
Docket/Case Number:	2022003
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:	Other
Resolution Date:	01/23/2024



Sanctions Ordered:	Monetary/Fine \$13,185.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE DISCIPLINARY NOTICE REQUIRED MLEAL TO PAY A FINE IN THE AMOUNT OF AUD 20,000 (APPROXIMATELY USD 13,185). THE FINE WAS PAID AS DIRECTED.
Firm Statement	THE DISCIPLINARY NOTICE REQUIRED MLEAL TO PAY A FINE IN THE AMOUNT OF AUD 20,000 (APPROXIMATELY USD 13,185). THE FINE WAS PAID AS DIRECTED.

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Reporting Source:	Firm
Affiliate:	BOFA SECURITIES EUROPE S.A.
Current Status:	Final
Allegations:	EUREX ALLEGED THAT A BOFA SECURITIES EUROPE S.A. EXCHANGE TRADER HAD VIOLATED NUMBER 2.6 OF THE CONDITIONS FOR TRADING AT EUREX DEUTSCHLAND IN CONNECTION WITH A TRADE REQUEST THAT HAD BEEN ENTERED WITHOUT A SUBSEQUENT CORRESPONDING ORDER.
Initiated By:	EUREX DEUTSCHLAND
Date Initiated:	12/04/2023
Docket/Case Number:	CASE REF A 2023/35
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	12/04/2023
Sanctions Ordered:	Monetary/Fine \$1,100.00
Other Sanctions Ordered:	COSTS OF THE PROCEEDING
Sanction Details:	EUREX IMPOSED A FINE IN THE AMOUNT OF EUR1000 (APPROXIMATELY USD1100) ON BOFA SECURITIES EUROPE S.A. AND TO BEAR THE COSTS OF THE PROCEEDING TOTALING EUR2000 (APPROXIMATELY USD2200).



Firm Statement EUREX IMPOSED A FINE IN THE AMOUNT OF EUR1000 (APPROXIMATELY USD1100) ON BOFA SECURITIES EUROPE S.A. AND TO BEAR THE COSTS OF THE PROCEEDING TOTALING EUR2000 (APPROXIMATELY USD2200).

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Reporting Source: Firm

Affiliate: BANK OF AMERICA, NATIONAL ASSOCIATION

Current Status: Final

Allegations: THE CONSUMER FINANCIAL PROTECTION BUREAU ("CFPB") ALLEGED THAT BANK OF AMERICA, NATIONAL ASSOCIATION (THE FIRM) FAILED TO ACCURATELY COLLECT, RECORD, AND REPORT INFORMATION ON MORTGAGE LOAN APPLICANTS' RACE, ETHNICITY, AND SEX, IN VIOLATION OF SECTION 2803 OF THE HOME MORTGAGE DISCLOSURE ACT ("HMDA"), REGULATION C, 12 C.F.R. §§ 1003.4, 1003.5, AND SECTION 1036(A)(1)(A) OF THE CONSUMER FINANCIAL PROTECTION ACT OF 2010 ("CFPA"), 12 U.S.C. § 5536(A)(1)(A).

Initiated By: CONSUMER FINANCIAL PROTECTION BUREAU

Date Initiated: 11/28/2023

Docket/Case Number: FILE NO. 2023-CFPB-0016

Principal Product Type: No Product

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 11/28/2023

Sanctions Ordered: Monetary/Fine \$12,000,000.00
Cease and Desist/Injunction

Other Sanctions Ordered: UNDERTAKINGS

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS OF FACT OR CONCLUSIONS OF LAW, THE FIRM CONSENTED TO (1) THE ENTRY OF THE CONSENT ORDER, (2) NOT VIOLATE THE HMDA, 12 U.S.C. §§ 2801-2810, AND REGULATION C, 12 C.F.R. PT. 1003, (3) CERTAIN UNDERTAKINGS, AND (4) PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$12,000,000. THE



CIVIL MONETARY PENALTY WAS PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER.

Firm Statement

WITHOUT ADMITTING OR DENYING THE FINDINGS OF FACT OR CONCLUSIONS OF LAW, THE FIRM CONSENTED TO (1) THE ENTRY OF THE CONSENT ORDER, (2) NOT VIOLATE THE HMDA, 12 U.S.C. §§ 2801-2810, AND REGULATION C, 12 C.F.R. PT. 1003, (3) CERTAIN UNDERTAKINGS, AND (4) PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$12,000,000. THE CIVIL MONETARY PENALTY WAS PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER.

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE RESERVE BANK OF INDIA (RBI) ISSUED A SPEAKING ORDER AND IMPOSED A MONETARY PENALTY AGAINST BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR ALLEGEDLY CONTRAVENING INSTRUCTIONS ISSUED TO AD BANKS VIDE A.P. (DIR SERIES) CIRCULAR NO. 23 DATED APRIL 12, 2018 BY FAILING TO UPLOAD CERTAIN INFORMATION RELATED TO TRANSACTIONS UNDERTAKEN UNDER THE LIBERALISED REMITTANCE SCHEME.
Initiated By:	RESERVE BANK OF INDIA
Date Initiated:	11/13/2023
Docket/Case Number:	CO.FED.EPD.NO. 21.53.003/2023-2024
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:	11/30/2023
Sanctions Ordered:	Monetary/Fine \$120.00
Other Sanctions Ordered:	N/A
Sanction Details:	RBI IMPOSED A FINE IN THE AMOUNT OF INR10,000 (APPROXIMATELY



USD120) ON BANA. THE FINE WAS PAID AS DIRECTED.

Firm Statement

RBI IMPOSED A FINE IN THE AMOUNT OF INR10,000 (APPROXIMATELY USD120) ON BANA. THE FINE WAS PAID AS DIRECTED.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	THE COMMODITY FUTURES TRADING COMMISSION ("CFTC") ENTERED INTO A SETTLEMENT ORDER ("ORDER") WITH BANK OF AMERICA, N.A. ("BANA") AND MERRILL LYNCH INTERNATIONAL ("MLI", AND COLLECTIVELY WITH BANA, ("BOFA")). SETTLING AN ADMINISTRATIVE ACTION CONCERNING BOFA'S (A) FAILURE TO ACCURATELY REPORT SWAP DATA IN VIOLATION OF SECTION 2(A)(13)(F) AND (G) OF THE COMMODITY EXCHANGE ACT ("ACT") AND CFTC REGULATIONS ("REGULATIONS") 43.3, 45.3, 45.4, AND 45.14 AND (B) FAILURE TO DILIGENTLY SUPERVISE THE BANA AND MLI SWAP DEALER BUSINESSES IN VIOLATION OF SECTION 4S(H)(1)(B) OF THE ACT AND REGULATION 23.602(A).
Initiated By:	COMMODITY FUTURES TRADING COMMISSION
Date Initiated:	09/29/2023
Docket/Case Number:	CFTC DOCKET NO. 23-58
Principal Product Type:	Other
Other Product Type(s):	SWAP TRANSACTION REPORTING
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST, UNDERTAKING
Resolution:	Order
Resolution Date:	09/29/2023
Sanctions Ordered:	Monetary/Fine \$8,000,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	BOFA ADMITTED TO THE FACTS IN THE SETTLEMENT ORDER, ACKNOWLEDGED THEIR CONDUCT VIOLATED THE ACT AND REGULATIONS AND AGREED TO THE FOLLOWING SANCTIONS: (A) TO CEASE AND DESIST



FROM VIOLATING SECTIONS 2(A)(13)(F) AND (G) AND 4S(H)(1)(B) OF THE ACT, AND REGULATIONS 23.602(A), 43.3, 45.3, 45.4, AND 45.14, (B) TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$8,000,000, AND (C) TO COMPLY WITH CERTAIN CONDITIONS AND UNDERTAKINGS.

Firm Statement

BOFA ADMITTED TO THE FACTS IN THE SETTLEMENT ORDER, ACKNOWLEDGED THEIR CONDUCT VIOLATED THE ACT AND REGULATIONS AND AGREED TO THE FOLLOWING SANCTIONS: (A) TO CEASE AND DESIST FROM VIOLATING SECTIONS 2(A)(13)(F) AND (G) AND 4S(H)(1)(B) OF THE ACT, AND REGULATIONS 23.602(A), 43.3, 45.3, 45.4, AND 45.14, (B) TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$8,000,000, AND (C) TO COMPLY WITH CERTAIN CONDITIONS AND UNDERTAKINGS.

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE COMMODITY FUTURES TRADING COMMISSION ("CFTC") ENTERED INTO A SETTLEMENT ORDER ("ORDER") WITH BANK OF AMERICA, N.A. ("BANA") AND MERRILL LYNCH INTERNATIONAL ("MLI", AND COLLECTIVELY WITH BANA, ("BOFA")). SETTTLING AN ADMINISTRATIVE ACTION CONCERNING BOFA'S (A) FAILURE TO ACCURATELY REPORT SWAP DATA IN VIOLATION OF SECTION 2(A)(13)(F) AND (G) OF THE COMMODITY EXCHANGE ACT ("ACT") AND CFTC REGULATIONS ("REGULATIONS") 43.3, 45.3, 45.4, AND 45.14 AND (B) FAILURE TO DILIGENTLY SUPERVISE THE BANA AND MLI SWAP DEALER BUSINESSES IN VIOLATION OF SECTION 4S(H)(1)(B) OF THE ACT AND REGULATION 23.602(A).
Initiated By:	COMMODITY FUTURES TRADING COMMISSION
Date Initiated:	09/29/2023
Docket/Case Number:	CFTC DOCKET NO. 23-58
Principal Product Type:	Other
Other Product Type(s):	SWAP TRANSACTION REPORTING
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST, UNDERTAKING
Resolution:	Order
Resolution Date:	09/29/2023



Sanctions Ordered:	Monetary/Fine \$8,000,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	BOFA ADMITTED TO THE FACTS IN THE SETTLEMENT ORDER, ACKNOWLEDGED THEIR CONDUCT VIOLATED THE ACT AND REGULATIONS AND AGREED TO THE FOLLOWING SANCTIONS: (A) TO CEASE AND DESIST FROM VIOLATING SECTIONS 2(A)(13)(F) AND (G) AND 4S(H)(1)(B) OF THE ACT, AND REGULATIONS 23.602(A), 43.3, 45.3, 45.4, AND 45.14, (B) TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$8,000,000, AND (C) TO COMPLY WITH CERTAIN CONDITIONS AND UNDERTAKINGS.
Firm Statement	BOFA ADMITTED TO THE FACTS IN THE SETTLEMENT ORDER, ACKNOWLEDGED THEIR CONDUCT VIOLATED THE ACT AND REGULATIONS AND AGREED TO THE FOLLOWING SANCTIONS: (A) TO CEASE AND DESIST FROM VIOLATING SECTIONS 2(A)(13)(F) AND (G) AND 4S(H)(1)(B) OF THE ACT, AND REGULATIONS 23.602(A), 43.3, 45.3, 45.4, AND 45.14, (B) TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$8,000,000, AND (C) TO COMPLY WITH CERTAIN CONDITIONS AND UNDERTAKINGS.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	ON SEPTEMBER 15, 2023, MERRILL LYNCH INTERNATIONAL ("MLI") WAS NOTIFIED THAT THE FRANKFURT STOCK EXCHANGE ("FSE") ISSUED A DECISION ALLEGING THAT MLI FAILED TO CONVERT SHORT CODES USED INTO LONG CODES BY THE END OF THE FOLLOWING TRADING DAY IN VIOLATION OF FSE RULES.
Initiated By:	FRANKFURT STOCK EXCHANGE
Date Initiated:	09/15/2023
Docket/Case Number:	CASE REF. HM 46-2022
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Reprimand
Other Sanction(s)/Relief Sought:	



Resolution:	Decision
Resolution Date:	09/15/2023
Sanctions Ordered:	
Other Sanctions Ordered:	REPRIMAND, COSTS OF THE PROCEEDING
Sanction Details:	IN CONNECTION WITH THE DECISION, THE FSE REPRIMANDED MLI AND ORDERED MLI TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1040).
Firm Statement	IN CONNECTION WITH THE DECISION, THE FSE REPRIMANDED MLI AND ORDERED MLI TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1040).

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE OFFICE OF THE COMPTROLLER OF THE CURRENCY ("OCC") ALLEGED THAT BANK OF AMERICA, NATIONAL ASSOCIATION (THE FIRM) ASSESSED MULTIPLE OVERDRAFT AND INSUFFICIENT FUNDS FEES AGAINST CUSTOMERS FOR A SINGLE TRANSACTION IN VIOLATION OF SECTION 5 OF THE FEDERAL TRADE COMMISSION ACT ("FTC ACT"), 15 U.S.C. § 45(A)(1).
Initiated By:	OFFICE OF THE COMPTROLLER OF THE CURRENCY
Date Initiated:	07/11/2023
Docket/Case Number:	AA-ENF-2023-19
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	07/11/2023
Sanctions Ordered:	Monetary/Fine \$60,000,000.00
Other Sanctions Ordered:	N/A



Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS CONTAINED IN THE ORDER, THE FIRM CONSENTED TO PAY A CIVIL PENALTY IN THE AMOUNT OF \$60 MILLION. THE CIVIL MONETARY PENALTY WAS PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS CONTAINED IN THE ORDER, THE FIRM CONSENTED TO PAY A CIVIL PENALTY IN THE AMOUNT OF \$60 MILLION. THE CIVIL MONETARY PENALTY WAS PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER.

Disclosure 22 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE CONSUMER FINANCIAL PROTECTION BUREAU ("CFPB") ALLEGED THAT BANK OF AMERICA, NATIONAL ASSOCIATION (THE FIRM) (1) WITH RESPECT TO PROMOTIONAL BONUS OFFERS ON REWARDS CREDIT CARDS, CREATED THE DECEPTIVE NET IMPRESSION THAT BONUSES LINKED TO REWARDS CREDIT CARDS WERE AVAILABLE TO ALL CONSUMERS WHEN THOSE BONUSES WERE ONLY AVAILABLE TO CONSUMERS WHO APPLIED ONLINE, AND DENIED BONUSES TO CERTAIN TARGETED CONSUMERS WHO APPLIED IN-PERSON AND OVER THE PHONE; AND (2) WITH RESPECT TO OFFERING CONSUMER CREDIT CARD ACCOUNTS, IN SOME INSTANCES, APPLIED FOR AND OPENED CREDIT CARDS FOR CONSUMERS WITHOUT THEIR CONSENT AND OBTAINED CONSUMER REPORTS FOR THOSE CONSUMERS WITHOUT A PERMISSIBLE PURPOSE. THE CFPB ALLEGES THAT THESE ACTS VIOLATED THE TRUTH IN LENDING ACT, 15 U.S.C. § 1601 ET SEQ., AND ITS IMPLEMENTING REGULATION, REGULATION Z, 12 C.F.R. PART 1026; THE FAIR CREDIT REPORTING ACT (CFPA), 15 U.S.C. § 1681B(F); AND THE CONSUMER FINANCIAL PROTECTION ACT OF 2010, 12 U.S.C. §§ 5531 AND 5536.
Initiated By:	CONSUMER FINANCIAL PROTECTION BUREAU
Date Initiated:	07/11/2023
Docket/Case Number:	FILE NO. 2023-CFPB-0007
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist


Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 07/11/2023

Sanctions Ordered: Monetary/Fine \$30,000,000.00
Disgorgement/Restitution
Cease and Desist/Injunction

Other Sanctions Ordered: UNDERTAKINGS

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS OF FACT OR CONCLUSIONS OF LAW, THE FIRM CONSENTED TO (1) THE ENTRY OF THE ORDER, (2) NOT VIOLATE SECTIONS 1031 AND 1036 OF THE CFPA, 12 USC §§ 5531 AND 5536, (3) IDENTIFY AFFECTED CONSUMERS NOT PREVIOUSLY REMEDIATED TO PAY OR PROVIDE REDRESS, (4) CERTAIN UNDERTAKINGS, AND (5) PAYMENT OF A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$30,000,000. THE CIVIL MONETARY PENALTY WAS PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER.

Firm Statement WITHOUT ADMITTING OR DENYING THE FINDINGS OF FACT OR CONCLUSIONS OF LAW, THE FIRM CONSENTED TO (1) THE ENTRY OF THE ORDER, (2) NOT VIOLATE SECTIONS 1031 AND 1036 OF THE CFPA, 12 USC §§ 5531 AND 5536, (3) IDENTIFY AFFECTED CONSUMERS NOT PREVIOUSLY REMEDIATED TO PAY OR PROVIDE REDRESS, (4) CERTAIN UNDERTAKINGS, AND (5) PAYMENT OF A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$30,000,000. THE CIVIL MONETARY PENALTY WAS PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER.

Disclosure 23 of 170

Reporting Source: Firm

Affiliate: BANK OF AMERICA, NATIONAL ASSOCIATION

Current Status: Final

Allegations: THE CONSUMER FINANCIAL PROTECTION BUREAU (CFPB) ALLEGED THAT BANK OF AMERICA, NATIONAL ASSOCIATION (THE FIRM) COMMITTED UNFAIR ACTS AND PRACTICES WHEN IT CHARGED CONSUMERS REPEAT NON-SUFFICIENT FUNDS (NSF) FEES ON TRANSACTIONS RESUBMITTED TO THE FIRM FOR PAYMENT AFTER THEY WERE INITIALLY DECLINED (REPRESENTMENT FEES) IN VIOLATION OF SECTIONS 1031 AND 1036 OF THE CONSUMER FINANCIAL PROTECTION ACT OF 2010 (CFPA), 12 U.S.C. §§ 5531(A) AND (C)(1), 5536(A)(1)(B).

Initiated By: CONSUMER FINANCIAL PROTECTION BUREAU



Date Initiated:	07/11/2023
Docket/Case Number:	FILE NO. 2023-CFPB-0006
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	07/11/2023
Sanctions Ordered:	Monetary/Fine \$60,000,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS OF FACT OR CONCLUSIONS OF LAW, THE FIRM CONSENTED TO (1) THE ENTRY OF THE ORDER, (2) NOT VIOLATE SECTIONS 1031 AND 1036 OF THE CFPA, 12 U.S.C. §§ 5531 AND 5536 AND NOT ASSESS RE-PRESENTMENT NSF FEES, (3) COMPLY WITH CERTAIN UNDERTAKINGS, (4) PAY REDRESS TO AFFECTED CUSTOMERS, AND (5) PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$60 MILLION. THE CIVIL MONETARY PENALTY WAS PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS OF FACT OR CONCLUSIONS OF LAW, THE FIRM CONSENTED TO (1) THE ENTRY OF THE ORDER, (2) NOT VIOLATE SECTIONS 1031 AND 1036 OF THE CFPA, 12 U.S.C. §§ 5531 AND 5536 AND NOT ASSESS RE-PRESENTMENT NSF FEES, (3) COMPLY WITH CERTAIN UNDERTAKINGS, (4) PAY REDRESS TO AFFECTED CUSTOMERS, AND (5) PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$60 MILLION. THE CIVIL MONETARY PENALTY WAS PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER.

Disclosure 24 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE CONSUMER FINANCIAL PROTECTION BUREAU (CFPB) ALLEGED THAT



BANK OF AMERICA, NATIONAL ASSOCIATION (THE FIRM) COMMITTED UNFAIR ACTS AND PRACTICES WHEN IT CHARGED CONSUMERS REPEAT NON-SUFFICIENT FUNDS (NSF) FEES ON TRANSACTIONS RESUBMITTED TO THE FIRM FOR PAYMENT AFTER THEY WERE INITIALLY DECLINED (RE-PRESENTMENT FEES) IN VIOLATION OF SECTIONS 1031 AND 1036 OF THE CONSUMER FINANCIAL PROTECTION ACT OF 2010 (CFPA), 12 U.S.C. §§ 5531(A) AND (C)(1), 5536(A)(1)(B).

Initiated By:	CONSUMER FINANCIAL PROTECTION BUREAU
Date Initiated:	07/11/2023
Docket/Case Number:	FILE NO. 2023-CFPB-0006
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	07/11/2023
Sanctions Ordered:	Monetary/Fine \$60,000,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS OF FACT OR CONCLUSIONS OF LAW, THE FIRM CONSENTED TO (1) THE ENTRY OF THE ORDER, (2) NOT VIOLATE SECTIONS 1031 AND 1036 OF THE CFPA, 12 U.S.C. §§ 5531 AND 5536 AND NOT ASSESS RE-PRESENTMENT NSF FEES, (3) COMPLY WITH CERTAIN UNDERTAKINGS, (4) PAY REDRESS TO AFFECTED CUSTOMERS, AND (5) PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$60 MILLION. THE CIVIL MONETARY PENALTY WAS PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS OF FACT OR CONCLUSIONS OF LAW, THE FIRM CONSENTED TO (1) THE ENTRY OF THE ORDER, (2) NOT VIOLATE SECTIONS 1031 AND 1036 OF THE CFPA, 12 U.S.C. §§ 5531 AND 5536 AND NOT ASSESS RE-PRESENTMENT NSF FEES, (3) COMPLY WITH CERTAIN UNDERTAKINGS, (4) PAY REDRESS TO AFFECTED CUSTOMERS, AND (5) PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$60 MILLION. THE CIVIL MONETARY PENALTY WAS PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER.



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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	ON JULY 4, 2023, MERRILL LYNCH INTERNATIONAL ("MLI") WAS NOTIFIED THAT THE FRANKFURT STOCK EXCHANGE ("FSE") ISSUED A DECISION ALLEGING THAT MLI FAILED TO DULY UPLOAD CERTAIN TRADING ALGORITHMS USED AS PART OF ITS PARTICIPATION IN EXCHANGE TRADING PRIOR TO DEPLOYING THEM, IN VIOLATION OF FSE RULES.
Initiated By:	FRANKFURT STOCK EXCHANGE
Date Initiated:	07/04/2023
Docket/Case Number:	CASE REF. H 30-2022
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Reprimand
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	07/04/2023
Sanctions Ordered:	
Other Sanctions Ordered:	REPRIMAND, COSTS OF THE PROCEEDING
Sanction Details:	IN CONNECTION WITH THE DECISION, THE FSE REPRIMANDED MLI AND ORDERED MLI TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1097).
Firm Statement	IN CONNECTION WITH THE DECISION, THE FSE REPRIMANDED MLI AND ORDERED MLI TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1097).

Disclosure 26 of 170

Reporting Source: Firm



Affiliate:	BOFA SECURITIES EUROPE SA
Current Status:	Final
Allegations:	ON JULY 4, 2023, BOFA SECURITIES EUROPE SA ("BOFASE") WAS NOTIFIED THAT THE FRANKFURT STOCK EXCHANGE ("FSE") ISSUED A DECISION ALLEGING THAT BOFASE FAILED TO DULY UPLOAD CERTAIN TRADING ALGORITHMS USED AS PART OF ITS PARTICIPATION IN EXCHANGE TRADING PRIOR TO DEPLOYING THEM, IN VIOLATION OF FSE RULES.
Initiated By:	FRANKFURT STOCK EXCHANGE
Date Initiated:	07/04/2023
Docket/Case Number:	CASE REF. H 27-2022
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Reprimand
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	07/04/2023
Sanctions Ordered:	
Other Sanctions Ordered:	REPRIMAND, COSTS OF THE PROCEEDING
Sanction Details:	IN CONNECTION WITH THE DECISION, THE FSE REPRIMANDED BOFASE AND ORDERED BOFASE TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1097).
Firm Statement	IN CONNECTION WITH THE DECISION, THE FSE REPRIMANDED BOFASE AND ORDERED BOFASE TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1097).

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA YATIRIM BANK A.S.
Current Status:	Final
Allegations:	ON JUNE 8, 2023, BANK OF AMERICA YATIRIM BANK A.S. ("BAYB") WAS NOTIFIED THAT THE CAPITAL MARKETS BOARD OF TURKEY ("CMB")



ISSUED AN ADMINISTRATIVE FINE TO BAYB, AND EIGHTEEN OTHER FINANCIAL INSTITUTIONS, FOR VIOLATIONS OF GROSS SETTLEMENT RULES.

Initiated By: CAPITAL MARKETS BOARD OF TURKEY

Date Initiated: 06/08/2023

Docket/Case Number:

Principal Product Type: Equity Listed (Common & Preferred Stock)

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: 06/08/2023

Sanctions Ordered: Monetary/Fine \$8,040.00

Other Sanctions Ordered: N/A

Sanction Details: THE CMB ISSUED BAYB AN ADMINISTRATIVE FINE IN THE AMOUNT OF TRY 209,349 (APPROXIMATELY USD 8,040) ON JUNE 8, 2023. BAYB WILL PAY THE FINE AS DIRECTED.

Firm Statement THE CMB ISSUED BAYB AN ADMINISTRATIVE FINE IN THE AMOUNT OF TRY 209,349 (APPROXIMATELY USD 8,040) ON JUNE 8, 2023. BAYB WILL PAY THE FINE AS DIRECTED.

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Reporting Source: Firm

Affiliate: BOFA SECURITIES INDIA LIMITED

Current Status: Final

Allegations: THE NATIONAL STOCK EXCHANGE OF INDIA LTD. (NSE) APPROVED THE IMPOSITION OF AN ADMINISTRATIVE FINE ON BOFA SECURITIES INDIA LIMITED (BOFASI) FOR APPOINTING A DIRECTOR WITHOUT PRE-APPROVAL FROM NSE OR THE SECURITIES AND EXCHANGE BOARD OF INDIA, IN BREACH OF CIRCULARS SEBI/MIRSD/CIR.NO.03/2010 AND CIR/MIRSD/2/2011.

Initiated By: NATIONAL STOCK EXCHANGE OF INDIA LTD.



Date Initiated: 05/26/2023
Docket/Case Number: NSE/WRO-MEM/2022/3283
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: Other
Resolution Date: 05/26/2023
Sanctions Ordered: Monetary/Fine \$609.00
Other Sanctions Ordered:
Sanction Details: NSE IMPOSED A FINE IN THE AMOUNT OF INR50,000(APPROXIMATELY USD609) ON BOFASI. THE FINE WAS PAID AS DIRECTED.
Firm Statement NSE IMPOSED A FINE IN THE AMOUNT OF INR50,000(APPROXIMATELY USD609) ON BOFASI. THE FINE WAS PAID AS DIRECTED.

Disclosure 29 of 170

Reporting Source: Firm
Affiliate: BOFA SECURITIES EUROPE, SA
Current Status: Final
Allegations: ON MARCH 23, 2023, BOFA SECURITIES EUROPE, SA ("BOFA SE") WAS NOTIFIED THAT EUREX DEUTSCHLAND ("EUREX") ISSUED A DECISION ALLEGING THAT BOFA SE SUBMITTED INCORRECT INTEREST RATES IN EXCHANGE FOR SWAPS TRADES DUE TO A TECHNICAL ERROR IN A THIRD-PARTY VENDOR'S SOFTWARE, IN VIOLATION OF EUREX RULES.
Initiated By: EUREX DEUTSCHLAND
Date Initiated: 03/23/2023
Docket/Case Number: A 2022/41
Principal Product Type: Other
Other Product Type(s): EXCHANGE FOR SWAPS TRANSACTIONS



Principal Sanction(s)/Relief Sought:	Reprimand
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	03/23/2023
Sanctions Ordered:	
Other Sanctions Ordered:	REPRIMAND, COSTS OF THE PROCEEDING
Sanction Details:	IN CONNECTION WITH THE DECISION, THE EUREX REPRIMANDED BOFASE AND ORDERED BOFASE TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 2000 (APPROXIMATELY USD 2170).
Firm Statement	IN CONNECTION WITH THE DECISION, THE EUREX REPRIMANDED BOFASE AND ORDERED BOFASE TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 2000 (APPROXIMATELY USD 2170).

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR AGRARIAN REFORM CREDIT/OTHER AGRICULTURAL CREDIT (AGRI-AGRA) FOR THE QUARTERS ENDED 3-31-2022 THROUGH 6-30-2022.
Initiated By:	BANGKO SENTRAL NG PILIPINAS
Date Initiated:	03/16/2023
Docket/Case Number:	REF. NO DSA-2023-01-0230F_DSA-L-BA; DTS NO. DSA-2023-01-0230
Principal Product Type:	Other
Other Product Type(s):	BANK LOANS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	



Resolution:	Other
Resolution Date:	03/16/2023
Sanctions Ordered:	Monetary/Fine \$121,723.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP6,701,462.54 (APPROXIMATELY USD121,723) ON BANA. THE PAYMENT WILL BE MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.
Firm Statement	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP6,701,462.54 (APPROXIMATELY USD121,723) ON BANA. THE PAYMENT WILL BE MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Disclosure 31 of 170

Reporting Source:	Firm
Affiliate:	BOFA SECURITIES EUROPE S.A., LTD.
Current Status:	Final
Allegations:	ON FEBRUARY 1, 2023, BOFA SECURITIES EUROPE S.A., LTD. ("BOFA SE") WAS NOTIFIED THAT EUREX DEUTSCHLAND ("EUREX") ISSUED A DECISION ALLEGING THAT BOFA SE FAILED TO CONVERT SHORT CODES USED INTO LONG CODES BY THE END OF THE FOLLOWING TRADING DAY IN VIOLATION OF EUREX RULES.
Initiated By:	EUREX DEUTSCHLAND
Date Initiated:	02/01/2023
Docket/Case Number:	M 2022/12
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Reprimand
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	02/01/2023
Sanctions Ordered:	



Other Sanctions Ordered:	REPRIMAND, COSTS OF THE PROCEEDING
Sanction Details:	IN CONNECTION WITH THE DECISION, THE EUREX REPRIMANDED BOFASE AND ORDERED BOFASE TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1065).
Firm Statement	IN CONNECTION WITH THE DECISION, THE EUREX REPRIMANDED BOFASE AND ORDERED BOFASE TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1065).

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA CORPORATION
Current Status:	Final
Allegations:	COMMISSIONE NAZIONALE PER LE SOCIETA E LA BORSA (CONSOB) ISSUED A DECISION IMPOSING AN ADMINISTRATIVE FINE ON BANK OF AMERICA CORPORATION (BAC) FOR IN CONNECTION WITH THE LATE COMMUNICATION TO THE PUBLIC OF INSIDE INFORMATION CONCERNING THE DECISION TO EXERCISE THE CALL OF A BOND ISSUED BY BAC BECAUSE THE PRESS RELEASE WAS ISSUED TOO CLOSE IN TIME TO THE DATE OF THE EARLY REDEMPTION IN VIOLATION OF ARTICLE 17, PARAGRAPH 1 OF THE COUNCIL OF 16 APRIL 2014 ON MARKET ABUSE.
Initiated By:	COMMISSIONE NAZIONALE PER LE SOCIETA E LA BORSA (CONSOB)
Date Initiated:	10/05/2022
Docket/Case Number:	DECISION NO. 22460
Principal Product Type:	Debt - Corporate
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:	10/05/2022
Sanctions Ordered:	Monetary/Fine \$14,582.00
Other Sanctions Ordered:	N/A
Sanction Details:	CONSOB IMPOSED A PENALTY IN THE AMOUNT OF EUR15,000



(APPROXIMATELY USD14,582) ON BAC. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE DECISION.

Firm Statement

CONSOB IMPOSED A PENALTY IN THE AMOUNT OF EUR15,000 (APPROXIMATELY USD14,582) ON BAC. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE DECISION.

Disclosure 33 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA CORPORATION
Current Status:	Final
Allegations:	THE BUNDESANSTALT FUR FINANZDIENSTLEISTUNGSAUFSICHT (BAFIN) APPROVED THE IMPOSITION OF AN ADMINISTRATIVE FINE ON BANK OF AMERICA CORPORATION FOR FAILURE TO TAKE THE SUPERVISORY AND ORGANISATIONAL MEASURES THAT WOULD HAVE BEEN REQUIRED IN ORDER TO ENSURE THE CORRECT AND COMPLETE SUBMISSION OF VOTING RIGHTS NOTIFICATIONS WITHIN THE PRESCRIBED PERIOD, IN BREACH OF SECTION 130(1) OF THE GERMAN ACT ON BREACHES OF ADMINISTRATIVE REGULATIONS IN CONJUNCTION WITH SECTIONS 33 (1) SENTENCE 1, SECTION 38(1) SENTENCE 1 AND 39 (1) OF THE GERMAN SECURITIES TRADING ACT.
Initiated By:	BUNDESANSTALT FUR FINANZDIENSTLEISTUNGSAUFSICHT (BAFIN)
Date Initiated:	08/22/2022
Docket/Case Number:	WA 15-WP 3121-2020/0001; WA 15-WP 3121-2020/0002; WA 15=WP 3121-2020/0003; WA 15-WP 3120-2020/0012
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:	Other
Resolution Date:	08/22/2022
Sanctions Ordered:	Monetary/Fine \$5,071,950.00
Other Sanctions Ordered:	COSTS OF THE PROCEEDING
Sanction Details:	BAFIN IMPOSED A PENALTY IN THE AMOUNT OF EUR5,100,000



(APPROXIMATELY USD5,071,950) ON BAC AND COSTS OF THE PROCEEDING IN THE AMOUNT OF EUR7,500 (APPROXIMATELY USD 7,479). THE PAYMENTS WERE MADE IN ACCORDANCE WITH THE TERMS OF THE ORDER.

Firm Statement

BAFIN IMPOSED A PENALTY IN THE AMOUNT OF EUR5,100,000 (APPROXIMATELY USD5,071,950) ON BAC AND COSTS OF THE PROCEEDING IN THE AMOUNT OF EUR7,500 (APPROXIMATELY USD 7,479). THE PAYMENTS WERE MADE IN ACCORDANCE WITH THE TERMS OF THE ORDER.

Disclosure 34 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR AGRARIAN REFORM CREDIT/OTHER AGRICULTURAL CREDIT (AGRI-AGRA) FOR THE QUARTERS ENDED 3-31-2021 THROUGH 12-31-2021.
Initiated By:	BANGKO SENTRAL NG PILIPINAS
Date Initiated:	08/16/2022
Docket/Case Number:	REF. NO DSA-202207-0124_CMD-L-KB-BA; DTS NO. DSA-2022-07-0126
Principal Product Type:	Other
Other Product Type(s):	BANK LOANS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	08/16/2022
Sanctions Ordered:	Monetary/Fine \$223,827.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP12,588,039.11 (APPROXIMATELY USD223,827) ON BANA. THE PAYMENT WAS MADE IN



ACCORDANCE WITH THE TERMS OF THE LETTER.

Firm Statement

THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP12,588,039.11 (APPROXIMATELY USD223,827) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Disclosure 35 of 170

Reporting Source: Firm

Affiliate: BANK OF AMERICA, NATIONAL ASSOCIATION

Current Status: Final

Allegations: THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR AGRARIAN REFORM CREDIT/OTHER AGRICULTURAL CREDIT (AGRI-AGRA) FOR THE QUARTERS ENDED 3-31-2020 THROUGH 12-31-2020.

Initiated By: BANGKO SENTRAL NG PILIPINAS

Date Initiated: 05/17/2022

Docket/Case Number: REF. NO DSA-202207-0027_CMD-L-KB-BA

Principal Product Type: Other

Other Product Type(s): BANK LOANS

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

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 05/17/2022

Sanctions Ordered: Monetary/Fine \$244,002.00

Other Sanctions Ordered: N/A

Sanction Details: THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP12,785,711.62 (APPROXIMATELY USD244,002) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Firm Statement

THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP12,785,711.62 (APPROXIMATELY USD244,002) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.



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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE OFFICE OF THE COMPTROLLER OF THE CURRENCY ("OCC") ALLEGED THAT BANK OF AMERICA, NATIONAL ASSOCIATION (THE FIRM) (1) IN CONNECTION WITH THE FIRM'S ADMINISTRATION OF PREPAID CARDS FOR UNEMPLOYMENT BENEFITS, ENGAGED IN (I) UNSAFE OR UNSOUND PRACTICE(S), INCLUDING DEFICIENCIES IN ITS RISK MANAGEMENT, OPERATIONAL PROCESSES AND CONTROLS, INTERNAL AUDIT, AND INVESTIGATION AND RESOLUTION OF CONSUMER CLAIMS OF UNAUTHORIZED TRANSACTIONS; AND (II) UNFAIR AND DECEPTIVE PRACTICES IN VIOLATION(S) OF SECTION 5 OF THE FEDERAL TRADE COMMISSION ACT ("FTC ACT"), 15 U.S.C. § 45(A)(1); AND (2) ENGAGED IN UNSAFE OR UNSOUND PRACTICES RELATED TO DEFICIENCIES IN ITS ENTERPRISE-WIDE COMPLAINTS RISK MANAGEMENT FRAMEWORK.
Initiated By:	OFFICE OF THE COMPTROLLER OF THE CURRENCY
Date Initiated:	07/14/2022
Docket/Case Number:	AA_ENF-2022-22
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	07/14/2022
Sanctions Ordered:	Monetary/Fine \$125,000,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS CONTAINED IN THE ORDER, THE FIRM CONSENTED TO A CIVIL MONETARY PENALTY OF \$125,000,000.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS CONTAINED IN THE ORDER, THE FIRM CONSENTED TO A CIVIL MONETARY PENALTY OF

\$125,000,000.

Disclosure 37 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	<p>THE CONSUMER FINANCIAL PROTECTION BUREAU ("CFPB") ALLEGED THAT BANK OF AMERICA, NATIONAL ASSOCIATION (THE FIRM) (1) ENGAGED IN UNFAIR ACTS OR PRACTICES BY DETERMINING NO ERROR HAD OCCURRED AND FREEZING CARDHOLDER ACCOUNTS BASED SOLELY ON THE RESULTS OF ITS AUTOMATED FRAUD FILTER, IN VIOLATION OF SECTIONS 1031 AND 1036 OF THE CONSUMER FINANCIAL PROTECTION ACT OF 2010 (CFPA), 12 U.S.C. §§ 5531(A) AND (C), 5536(A)(1)(B); (2) FAILED TO CONDUCT REASONABLE INVESTIGATIONS OF UNEMPLOYMENT INSURANCE BENEFIT PREPAID DEBIT CARDHOLDERS' NOTICES OF ERROR, IN VIOLATION OF SECTIONS 908 AND 909 OF THE ELECTRONIC FUND TRANSFER ACT (EFTA), 15 U.S.C. §§ 1693F AND 1693G, AND SECTION 1005.11 OF REGULATION E; (3) ENGAGED IN ABUSIVE ACTS OR PRACTICES BY RETROACTIVELY APPLYING ITS AUTOMATED FRAUD FILTER TO REVERSE PERMANENT CREDITS FOR UNEMPLOYMENT INSURANCE BENEFIT PREPAID DEBIT CARDHOLDERS WHOSE NOTICES OF ERROR IT HAD PREVIOUSLY INVESTIGATED AND PAID, IN VIOLATION OF SECTIONS 1031 AND 1036 OF THE CFPA, 12 U.S.C. §§ 5531(A) AND (D)(2)(B), 5536(A)(1)(B); (4) ENGAGED IN UNFAIR ACTS OR PRACTICES BY IMPEDING UNEMPLOYMENT INSURANCE BENEFIT PREPAID DEBIT CARDHOLDERS' EFFORTS TO FILE NOTICES OF ERROR AND SEEK LIABILITY PROTECTION FROM UNAUTHORIZED EFTS, IN VIOLATION OF SECTIONS 1031 AND 1036 OF THE CFPA, 12 U.S.C. §§ 5531(A) AND (C), 5536(A)(1)(B); AND (5) FAILED TO TIMELY INVESTIGATE AND RESOLVE UNEMPLOYMENT INSURANCE BENEFIT PREPAID DEBIT CARDHOLDERS' NOTICES OF ERROR CONCERNING ALLEGED UNAUTHORIZED EFTS, IN VIOLATION OF EFTA, 15 U.S.C. § 1693F(A), (C), AND SECTION 1005.11(C)(2)-(3) OF REGULATION E.</p>
Initiated By:	CONSUMER FINANCIAL PROTECTION BUREAU
Date Initiated:	07/14/2022
Docket/Case Number:	FILE NO. 2022-CFPB-0004
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)


Other Sanction(s)/Relief Sought:
Resolution: Consent

Resolution Date: 07/14/2022

Sanctions Ordered: Monetary/Fine \$100,000,000.00
 Disgorgement/Restitution
 Cease and Desist/Injunction

Other Sanctions Ordered: UNDERTAKINGS

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS OF FAT OF CONCLUSIONS OF LAW CONTAINED WITHIN THE ORDER, THE FIRM CONSENTED TO (A) CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF THE PROVISIONS DETAILED ABOVE, (B) CERTAIN UNDERTAKINGS, (C) PAYMENT OF REDRESS TO AFFECTED CUSTOMERS, AND (D) PAYMENT OF A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$100 MILLION.

Firm Statement WITHOUT ADMITTING OR DENYING THE FINDINGS OF FAT OF CONCLUSIONS OF LAW CONTAINED WITHIN THE ORDER, THE FIRM CONSENTED TO (A) CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF THE PROVISIONS DETAILED ABOVE, (B) CERTAIN UNDERTAKINGS, (C) PAYMENT OF REDRESS TO AFFECTED CUSTOMERS, AND (D) PAYMENT OF A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$100 MILLION.

Disclosure 38 of 170
Reporting Source: Firm

Affiliate: MERRILL LYNCH INTERNATIONAL

Current Status: Final

Allegations: ON JUNE 13, 2022, MERRILL LYNCH INTERNATIONAL ("MLI") WAS NOTIFIED THAT THE FRANKFURT STOCK EXCHANGE ("FSE") ISSUED A DECISION ALLEGING THAT MLI FAILED TO CONVERT SHORT CODES USED INTO LONG CODES BY THE END OF THE FOLLOWING TRADING DAY IN VIOLATION OF FSE RULES.

Initiated By: FRANKFURT STOCK EXCHANGE

Date Initiated: 06/13/2022

Docket/Case Number: CASE REF. H 59-2021

Principal Product Type: No Product

**Other Product Type(s):**

Principal Sanction(s)/Relief Sought: Reprimand

Other Sanction(s)/Relief Sought:

Resolution: Decision

Resolution Date: 06/13/2022

Sanctions Ordered:

Other Sanctions Ordered: REPRIMAND, COSTS OF THE PROCEEDING

Sanction Details: IN CONNECTION WITH THE DECISION, THE FSE REPRIMANDED MLI AND ORDERED MLI TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1040).

Firm Statement IN CONNECTION WITH THE DECISION, THE FSE REPRIMANDED MLI AND ORDERED MLI TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1040).

Disclosure 39 of 170

Reporting Source: Firm

Affiliate: MERRILL LYNCH COMMODITIES INC.

Current Status: Final

Allegations: ICE FUTURES EUROPE ("ICE EUROPE") ALLEGED THAT MERRILL LYNCH COMMODITIES INC. ("MLCI") FAILED TO SUBMIT ITS ANNUAL MEMBER RETURN IN A TIMELY FASHION IN BREACH OF ICE EUROPE RULE B.5.1(C).

Initiated By: ICE FUTURES EUROPE

Date Initiated: 05/19/2022

Docket/Case Number: CIRCULAR 22/075

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:	Other
Resolution Date:	05/19/2022
Sanctions Ordered:	Monetary/Fine \$6,250.00
Other Sanctions Ordered:	N/A
Sanction Details:	MLCI WAS ISSUED A SUMMARY FINE OF GBP 5,000 (APPROXIMATELY USD 6,250). THE FINE WILL BE PAID IN ACCORDANCE WITH THE NOTICE.
Firm Statement	MLCI WAS ISSUED A SUMMARY FINE OF GBP 5,000 (APPROXIMATELY USD 6,250). THE FINE WILL BE PAID IN ACCORDANCE WITH THE NOTICE.

Disclosure 40 of 170

Reporting Source:	Firm
Affiliate:	BOFA SECURITIES EUROPE SA
Current Status:	Final
Allegations:	ON MAY 27, 2022, BOFA SECURITIES EUROPE SA ("BOFA SE") RECEIVED NOTICE THAT THE FRANKFURT STOCK EXCHANGE ("FSE") ISSUED A DECISION ALLEGING THAT BOFA SE FAILED TO DULY CONVERT SHORT CODES USED INTO LONG CODES IN VIOLATION OF FSE RULES.
Initiated By:	FRANKFURT STOCK EXCHANGE
Date Initiated:	05/27/2022
Docket/Case Number:	CASE REF. H 54-2021
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Reprimand
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	05/27/2022
Sanctions Ordered:	
Other Sanctions Ordered:	REPRIMAND, COSTS OF THE PROCEEDING
Sanction Details:	IN CONNECTION WITH THE DECISION, THE FSE REPRIMANDED BOFA SE AND ORDERED BOFA SE TO PAY THE COSTS OF THE PROCEEDING, WHICH



TOTALED EUR 1000 (APPROXIMATELY USD 1070).

Firm Statement

IN CONNECTION WITH THE DECISION, THE FSE REPRIMANDED BOFASE AND ORDERED BOFASE TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1070).

Disclosure 41 of 170

Reporting Source: Firm

Affiliate: BANK OF AMERICA, NATIONAL ASSOCIATION

Current Status: Final

Allegations: THE CONSUMER FINANCIAL PROTECTION BUREAU ("CFPB") ALLEGED THAT BANK OF AMERICA, NATIONAL ASSOCIATION (THE FIRM) (1) ENGAGED IN UNFAIR ACTS AND PRACTICES BY RESPONDING TO AND PROCESSING GARNISHMENT NOTICES AGAINST OUT-OF-STATE BANK ACCOUNTS IN VIOLATION OF CERTAIN GARNISHMENT-ISSUING STATES' PROHIBITIONS AGAINST OUT-OF-STATE GARNISHMENT; (2) ENGAGED IN UNFAIR ACTS AND PRACTICES BY FAILING TO APPLY THE APPROPRIATE STATE EXEMPTIONS TO CERTAIN CONSUMERS' DEPOSIT ACCOUNTS AFTER RECEIVING GARNISHMENT NOTICES; (3) ENGAGED IN DECEPTIVE ACTS AND PRACTICES BY MISREPRESENTING TO CONSUMERS, BY IMPLICATION, THE APPLICABLE STATE EXEMPTION RIGHTS FOR GARNISHMENT BY APPLYING THE ISSUING STATE'S EXEMPTIONS INSTEAD OF THE EXEMPTIONS OF THE CONSUMER'S STATE OF RESIDENCE, WHERE THE STATES OF ISSUANCE AND RESIDENCE DIFFER; (4) ENGAGED IN UNFAIR ACTS AND PRACTICES BY USING A DEPOSIT AGREEMENT THAT REQUIRED CONSUMERS TO DIRECT THE FIRM NOT TO CONTEST LEGAL PROCESS AND WAIVE THE FIRM'S LIABILITY FOR ITS UNLAWFUL GARNISHMENT CONDUCT; AND (5) ENGAGED IN DECEPTIVE ACTS AND PRACTICES BY SUGGESTING CONSUMERS COULD NOT BRING LEGAL CLAIMS MISREPRESENTING CONSUMERS' LEGAL RIGHTS AGAINST THE FIRM REGARDING GARNISHMENT PROCEEDINGS. THE CFPB ALLEGES THAT THESE ACTS VIOLATED SECTIONS 1031(A) AND 1036(A)(1)(B) OF THE CONSUMER FINANCIAL PROTECTION ACT OF 2010 ("CFPA"), 12 USC §§ 5531(A) AND (C)(1) AND 5536(A)(1)(B).

Initiated By: CONSUMER FINANCIAL PROTECTION BUREAU

Date Initiated: 05/04/2022

Docket/Case Number: FILE NO. 2022-CFPB-0002

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:	CEASE AND DESIST, RESTITUTION, UNDERTAKING
Resolution:	Consent
Resolution Date:	05/04/2022
Sanctions Ordered:	Monetary/Fine \$10,000,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO (1) THE ENTRY OF THE ORDER, (2) NOT VIOLATE SECTIONS 1031(A) AND 1036(A)(1)(B) OF THE CFPA, 12 USC §§ 5531(A) AND (C)(1) AND 5536(A)(1)(B), (3) REFUND ALL GARNISHMENT-RELATED FEES PAID BY THE AFFECTED CONSUMERS TOTALING NO LESS THAN \$592,000 AND CANCEL ANY UNPAID GARNISHMENT RELATED FEES, (4) CERTAIN UNDERTAKINGS, AND (5) PAYMENT OF A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$10,000,000. THE CIVIL MONETARY PENALTY WAS PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO (1) THE ENTRY OF THE ORDER, (2) NOT VIOLATE SECTIONS 1031(A) AND 1036(A)(1)(B) OF THE CFPA, 12 USC §§ 5531(A) AND (C)(1) AND 5536(A)(1)(B), (3) REFUND ALL GARNISHMENT-RELATED FEES PAID BY THE AFFECTED CONSUMERS TOTALING NO LESS THAN \$592,000 AND CANCEL ANY UNPAID GARNISHMENT RELATED FEES, (4) CERTAIN UNDERTAKINGS, AND (5) PAYMENT OF A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$10,000,000. THE CIVIL MONETARY PENALTY WAS PAID IN ACCORDANCE WITH THE TERMS OF THE ORDER.

Disclosure 42 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR AGRARIAN REFORM CREDIT/OTHER AGRICULTURAL CREDIT (AGRI-AGRA) FOR THE QUARTERS ENDED 6-30-2014 THROUGH 6-



30-2015.

Initiated By: BANGKO SENTRAL NG PILIPINAS

Date Initiated: 08/18/2017

Docket/Case Number: UNKNOWN

Principal Product Type: Other

Other Product Type(s): BANK LOANS

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

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 08/18/2017

Sanctions Ordered: Monetary/Fine \$144,049.00

Other Sanctions Ordered: N/A

Sanction Details: THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP7,385,295 (APPROXIMATELY USD144,049) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Firm Statement THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP7,385,295 (APPROXIMATELY USD144,049) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Disclosure 43 of 170

Reporting Source: Firm

Affiliate: BANK OF AMERICA, NATIONAL ASSOCIATION

Current Status: Final

Allegations: THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR AGRARIAN REFORM CREDIT/OTHER AGRICULTURAL CREDIT (AGRI-AGRA) FOR THE QUARTERS ENDED 3-31-2019 THROUGH 12-31-2019.

Initiated By: BANGKO SENTRAL NG PILIPINAS

Date Initiated: 10/05/2021



Docket/Case Number:	REF. NO DSA-202109-0411 RODI-L-KB-BA; DTS NO. DSA-202101-0011
Principal Product Type:	Other
Other Product Type(s):	BANK LOANS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	10/05/2021
Sanctions Ordered:	Monetary/Fine \$172,925.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP8,747,166.22 (APPROXIMATELY USD172,925) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.
Firm Statement	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP8,747,166.22 (APPROXIMATELY USD172,925) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Disclosure 44 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR AGRARIAN REFORM CREDIT/OTHER AGRICULTURAL CREDIT (AGRI-AGRA) FOR THE QUARTERS ENDED 9-30-2015 THROUGH 12-31-2016.
Initiated By:	BANGKO SENTRAL NG PILIPINAS
Date Initiated:	08/20/2017
Docket/Case Number:	UNKNOWN
Principal Product Type:	Other
Other Product Type(s):	BANK LOANS



Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	08/20/2017
Sanctions Ordered:	Monetary/Fine \$100,527.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP5,105,759. 72(APPROXIMATELY USD100,527) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.
Firm Statement	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP5,105,759. 72(APPROXIMATELY USD100,527) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Disclosure 45 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR AGRARIAN REFORM CREDIT/OTHER AGRICULTURAL CREDIT (AGRI-AGRA) FOR THE QUARTERS ENDED 3-31-2018 THROUGH 12-31-2018.
Initiated By:	BANGKO SENTRAL NG PILIPINAS
Date Initiated:	01/25/2021
Docket/Case Number:	REF. NO DSA-202101-0004_ROD1-L-K-BA; DTS NO. DSA-202101-0009
Principal Product Type:	Other
Other Product Type(s):	BANK LOANS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	



Resolution:	Other
Resolution Date:	01/25/2021
Sanctions Ordered:	Monetary/Fine \$127,795.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP6,145,640 (APPROXIMATELY USD127,795) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.
Firm Statement	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP6,145,640 (APPROXIMATELY USD127,795) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Disclosure 46 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR AGRARIAN REFORM CREDIT/OTHER AGRICULTURAL CREDIT (AGRI-AGRA) FOR THE QUARTERS ENDED 3-31-2018 THROUGH 12-31-2018.
Initiated By:	BANGKO SENTRAL NG PILIPINAS
Date Initiated:	03/14/2019
Docket/Case Number:	REF. NO SDC-201902-0003-DRD1-L-KB-BA; DTS NO. DSA-201902-0461
Principal Product Type:	Other
Other Product Type(s):	BANK LOANS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	03/14/2019
Sanctions Ordered:	Monetary/Fine \$115,286.00



Other Sanctions Ordered:	N/A
Sanction Details:	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP6,145,640 (APPROXIMATELY USD115,286) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.
Firm Statement	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP6,145,640 (APPROXIMATELY USD115,286) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Disclosure 47 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR AGRARIAN REFORM CREDIT/OTHER AGRICULTURAL CREDIT (AGRI-AGRA) FOR THE QUARTERS ENDED 3-31-2017 THROUGH 12-31-2017.
Initiated By:	BANGKO SENTRAL NG PILIPINAS
Date Initiated:	05/10/2018
Docket/Case Number:	REF. NO. SDC-201805-201806_002D_DRD1-L-KB-BA; DTS NO. DSA-201805-0225
Principal Product Type:	Other
Other Product Type(s):	BANK LOANS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	05/10/2018
Sanctions Ordered:	Monetary/Fine \$81,462.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP4,222,649.20 (APPROXIMATELY USD81,462) ON BANA. THE PAYMENT WAS MADE IN



ACCORDANCE WITH THE TERMS OF THE LETTER.

Firm Statement

THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP4,222,649.20 (APPROXIMATELY USD81,462) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Disclosure 48 of 170

Reporting Source: Firm

Affiliate: BANK OF AMERICA, NATIONAL ASSOCIATION

Current Status: Final

Allegations: THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR MICRO-, SMALL-, AND MEDIUM-SIZED ENTERPRISES (MSMES) FOR THE PERIOD ENDED 6-30-2017.

Initiated By: BANGKO SENTRAL NG PILIPINAS

Date Initiated: 09/22/2017

Docket/Case Number: REF. NO SDC-2DJ709-33C5_DRD1-L-KB-BA; DTS NO. SDC-201709-0590

Principal Product Type: Other

Other Product Type(s): BANK LOANS

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

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 09/22/2017

Sanctions Ordered: Monetary/Fine \$9,902.00

Other Sanctions Ordered: N/A

Sanction Details: THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP500,000 (APPROXIMATELY USD9,902) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Firm Statement

THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP500,000 (APPROXIMATELY USD9,902) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.



Disclosure 49 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR MICRO-, SMALL-, AND MEDIUM-SIZED ENTERPRISES (MSMES) FOR THE PERIOD ENDED 6-16-2018.
Initiated By:	BANGKO SENTRAL NG PILIPINAS
Date Initiated:	11/05/2019
Docket/Case Number:	REF. NO DSA-201910-0052_RUD1-L-KB-BA; DTS NO. CSA-201910-1001
Principal Product Type:	Other
Other Product Type(s):	BANK LOANS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	11/05/2019
Sanctions Ordered:	Monetary/Fine \$9,946.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP500,000 (APPROXIMATELY USD9,946) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.
Firm Statement	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP500,000 (APPROXIMATELY USD9,946) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Disclosure 50 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION



Current Status:	Final
Allegations:	THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR MICRO-, SMALL-, AND MEDIUM-SIZED ENTERPRISES (MSMES) FOR THE PERIOD ENDED 12-31-2017.
Initiated By:	BANGKO SENTRAL NG PILIPINAS
Date Initiated:	01/29/2018
Docket/Case Number:	REF. NO. SDC-201801-0006_DRD1-L-XB-BA
Principal Product Type:	Other
Other Product Type(s):	BANK LOANS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	01/29/2018
Sanctions Ordered:	Monetary/Fine \$9,768.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP500,000 (APPROXIMATELY USD9,768) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.
Firm Statement	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP500,000 (APPROXIMATELY USD9,768) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Disclosure 51 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR MICRO-, SMALL-, AND MEDIUM-SIZED ENTERPRISES



(MSMES) FOR THE PERIOD ENDED 9-30-2017.

Initiated By: BANGKO SENTRAL NG PILIPINAS

Date Initiated: 02/02/2018

Docket/Case Number: REF. NO. SDC-201901-0013_DRD1-L-KB-BA; DTS NO. SDC-201801-1100

Principal Product Type: Other

Other Product Type(s): BANK LOANS

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

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 02/02/2018

Sanctions Ordered: Monetary/Fine \$9,702.00

Other Sanctions Ordered: N/A

Sanction Details: THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP500,000 (APPROXIMATELY USD9,702) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Firm Statement THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP500,000 (APPROXIMATELY USD9,702) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Disclosure 52 of 170

Reporting Source: Firm

Affiliate: BANK OF AMERICA, NATIONAL ASSOCIATION

Current Status: Final

Allegations: THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR MICRO-, SMALL-, AND MEDIUM-SIZED ENTERPRISES (MSMES) FOR THE PERIOD ENDED 3-31-2018.

Initiated By: BANGKO SENTRAL NG PILIPINAS

Date Initiated: 05/02/2018

Docket/Case Number: REF. NO. SDC-201804-0017_DRD1-L-KB-BA; DTS NO. SDC-201804-1381



Principal Product Type:	Other
Other Product Type(s):	BANK LOANS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	05/02/2018
Sanctions Ordered:	Monetary/Fine \$9,666.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP500,000 (APPROXIMATELY USD9,666) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.
Firm Statement	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP500,000 (APPROXIMATELY USD9,666) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Disclosure 53 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR NON-COMPLIANCE WITH THE MANDATORY CREDIT ALLOCATION FOR MICRO-, SMALL-, AND MEDIUM-SIZED ENTERPRISES (MSMES) FOR THE PERIOD ENDED 3-31-2017.
Initiated By:	BANGKO SENTRAL NG PILIPINAS
Date Initiated:	05/09/2017
Docket/Case Number:	REF. NO DRDI-KB-2017-05-066; DTS NO. SDC-201705-0231
Principal Product Type:	Other
Other Product Type(s):	BANK LOANS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)


Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 05/09/2017

Sanctions Ordered: Monetary/Fine \$10,011.00

Other Sanctions Ordered: N/A

Sanction Details: THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP500,000 (APPROXIMATELY USD10,011) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Firm Statement THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP500,000 (APPROXIMATELY USD10,011) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

Disclosure 54 of 170

Reporting Source: Firm

Affiliate: BOFA SECURITIES EUROPE SA

Current Status: Final

Allegations: ON DECEMBER 14, 2021, BOFA SECURITIES EUROPE SA ("BOFASE") WAS NOTIFIED THAT THE FRANKFURT STOCK EXCHANGE ("FSE") ISSUED A DECISION ALLEGING THAT BOFASE FAILED TO PROPERLY UPLOAD CERTAIN TRADING ALGORITHMS PRIOR TO THEIR USE IN VIOLATION OF FSE RULES.

Initiated By: FRANKFURT STOCK EXCHANGE

Date Initiated: 12/14/2021

Docket/Case Number: CASE REF. H 38-2021

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Reprimand

Other Sanction(s)/Relief Sought: COSTS OF PROCEEDING

Resolution: Decision

Resolution Date: 12/14/2021

**Sanctions Ordered:**

Other Sanctions Ordered: REPRIMAND, COSTS OF THE PROCEEDING

Sanction Details: IN CONNECTION WITH THE DECISION, THE FSE REPRIMANDED BOFASE AND ORDERED BOFASE TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1131).

Firm Statement IN CONNECTION WITH THE DECISION, THE FSE REPRIMANDED BOFASE AND ORDERED BOFASE TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1131).

Disclosure 55 of 170

Reporting Source: Firm

Affiliate: BANK OF AMERICA YATIRIM BANK A.S.

Current Status: Final

Allegations: ON DECEMBER 14, 2021, BANK OF AMERICA YATIRIM BANK A.S. ("BAYB") WAS NOTIFIED THAT THE CAPITAL MARKETS BOARD OF TURKEY ("CMB") ISSUED A DECISION ALLEGING THAT BAYB ENGAGED IN UNLAWFUL SHORT SELLING IN VIOLATION OF ARTICLE 24 OF THE COMMUNIQUE SERIAL: V, NO. 65 ON MARGIN PURCHASE SHORT SALE BORROWING AND LENDING OF CAPITAL MARKET INSTRUMENTS AND ARTICLES 4 AND 5 OF THE COMMUNIQUE SERIAL V NO. 68 ON PRINCIPLES REGARDING THE INTERNAL AUDITING SYSTEMS OF BROKERAGE HOUSES

Initiated By: CAPITAL MARKETS BOARD OF TURKEY

Date Initiated: 12/14/2021

Docket/Case Number: DECISION NO. 64

Principal Product Type: Equity Listed (Common & Preferred Stock)

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Decision

Resolution Date: 12/14/2021

Sanctions Ordered: Monetary/Fine \$172,000.00

Other Sanctions Ordered: N/A



Sanction Details:	IN CONNECTION WITH THE DECISION, THE CMB ORDERED BAYB TO PAY A FINE IN THE AMOUNT OF TRY 2,347,876 (APPROXIMATELY USD 172,000). IF BAYB PAYS THE FINE WITHIN TWO MONTHS, THE FINE IS REDUCED BY 25 PERCENT.
Firm Statement	IN CONNECTION WITH THE DECISION, THE CMB ORDERED BAYB TO PAY A FINE IN THE AMOUNT OF TRY 2,347,876 (APPROXIMATELY USD 172,000). IF BAYB PAYS THE FINE WITHIN TWO MONTHS, THE FINE IS REDUCED BY 25 PERCENT.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	ON DECEMBER 9, 2021, MERRILL LYNCH INTERNATIONAL ("MLI") WAS NOTIFIED THAT THE FRANKFURT STOCK EXCHANGE ("FSE") ISSUED A DECISION ALLEGING THAT MLI FAILED TO PROPERLY UPLOAD CERTAIN TRADING ALGORITHMS PRIOR TO THEIR USE IN VIOLATION OF FSE RULES.
Initiated By:	FRANKFURT STOCK EXCHANGE
Date Initiated:	12/09/2021
Docket/Case Number:	CASE REF. H 40-2021
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Reprimand
Other Sanction(s)/Relief Sought:	COSTS OF PROCEEDING
Resolution:	Decision
Resolution Date:	12/09/2021
Sanctions Ordered:	
Other Sanctions Ordered:	REPRIMAND, COSTS OF THE PROCEEDING
Sanction Details:	IN CONNECTION WITH THE DECISION, THE FSE REPRIMANDED MLI AND ORDERED MLI TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1131).
Firm Statement	IN CONNECTION WITH THE DECISION, THE FSE REPRIMANDED MLI AND



ORDERED MLI TO PAY THE COSTS OF THE PROCEEDING, WHICH TOTALED EUR 1000 (APPROXIMATELY USD 1131).

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	A PANEL OF THE CHICAGO BOARD OF TRADE BUSINESS CONDUCT COMMITTEE ("BCC") ALLEGED THAT BANK OF AMERICA, NATIONAL ASSOCIATION (THE "FIRM") (1) EXECUTED AN EXCHANGE FOR RELATED RISK ("EFR") TRANSACTION THAT CONSISTED OF THE SIMULTANEOUS EXECUTION OF FUTURES POSITIONS WITHOUT THE EXCHANGE OF CORRESPONDING OTC SWAPS, THEREBY CONSTITUTING A NON-BONA FIDE EFR; AND (2) AS PART OF THE SAME LARGE, COUNTERPARTY-PROPOSED TRANSACTION, EXECUTED BUY AND SELL ORDERS FOR THE SAME ACCOUNT AND KNEW OR REASONABLY SHOULD HAVE KNOWN THAT THE ORDERS WOULD MATCH AND AVOID ANY MARKET RISK. THE BCC FOUND THAT THE FIRM VIOLATED CBOT RULES 538.C AND 534.
Initiated By:	CHICAGO BOARD OF TRADE
Date Initiated:	10/28/2021
Docket/Case Number:	CBOT 21-1460-BC
Principal Product Type:	Futures - Financial
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:	10/28/2021
Sanctions Ordered:	Monetary/Fine \$30,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION OR FACTUAL FINDINGS UPON WHICH THE PENALTY IS BASED, THE BCC ORDERED THE FIRM TO PAY A \$30,000 FINE.
Firm Statement	WITHOUT ADMITTING OR DENYING THE RULE VIOLATION OR FACTUAL



FINDINGS UPON WHICH THE PENALTY IS BASED, THE BCC ORDERED THE FIRM TO PAY A \$30,000 FINE.

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Reporting Source:	Firm
Affiliate:	BOFA SECURITIES EUROPE S.A.
Current Status:	Final
Allegations:	EUREX ALLEGED THAT AN EXCHANGE TRADER HAD VIOLATED NUMBER 2.6 OF THE CONDITIONS FOR TRADING AT EUREX DEUTSCHLAND IN CONNECTION WITH THREE TRADE REQUESTS THAT HAD BEEN ENTERED WITHOUT SUBSEQUENT CORRESPONDING ORDERS.
Initiated By:	EUREX DEUTSCHLAND
Date Initiated:	08/17/2021
Docket/Case Number:	CASE REF 2021/27
Principal Product Type:	Futures - Financial
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	08/17/2021
Sanctions Ordered:	Monetary/Fine \$2,362.00
Other Sanctions Ordered:	COSTS OF THE PROCEEDING
Sanction Details:	EUREX IMPOSED A FINE IN THE AMOUNT OF EUR2000 (APPROXIMATELY USD2362) ON BOFA SECURITIES EUROPE S.A. AND TO BEAR THE COSTS OF THE PROCEEDING TOTALING EUR2000 (APPROXIMATELY USD2362).
Firm Statement	EUREX IMPOSED A FINE IN THE AMOUNT OF EUR2000 (APPROXIMATELY USD2362) ON BOFA SECURITIES EUROPE S.A. AND TO BEAR THE COSTS OF THE PROCEEDING TOTALING EUR2000 (APPROXIMATELY USD2362).

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Reporting Source:	Firm
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Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) FOR VIOLATION OF SECTION 4.1 OF THE MANUAL OF REGULATIONS ON FOREIGN EXCHANGE TRANSACTIONS, AS AMENDED, EFFECTIVE AT THE TIME OF THE FX TRANSACTIONS, AND PURSUANT TO THEN APPENDIX 67 OF THE MANUAL OF REGULATIONS FOR BANKS.
Initiated By:	BANGKO SENTRAL NG PILIPINAS
Date Initiated:	08/06/2021
Docket/Case Number:	FILE/REF. NO PVSDMG-2021-AG5226LT
Principal Product Type:	Other
Other Product Type(s):	FX TRANSACTIONS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	08/21/2021
Sanctions Ordered:	Monetary/Fine \$200.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP10,000 (APPROXIMATELY USD200) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.
Firm Statement	THE BSP IMPOSED A PENALTY IN THE AMOUNT OF PHP10,000 (APPROXIMATELY USD200) ON BANA. THE PAYMENT WAS MADE IN ACCORDANCE WITH THE TERMS OF THE LETTER.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH MARKETS SINGAPORE PTE LIMITED ("MLMS")
Current Status:	Final
Allegations:	HE SECURITIES AND EXCHANGE BOARD OF INDIA ("SEBI") ALLEGED



MERRILL LYNCH MARKETS SINGAPORE PTE LIMITED (MLMS)
INCORRECTLY REPORTED OFFSHORE DERIVATIVE INSTRUMENTS IN
MONTHLY REPORTS FILED WITH SEBI, IN VIOLATION OF REGULATION 21
OF THE SEBI (FOREIGN PORTFOLIO INVESTORS) REGULATIONS, 2019 (FPI
REGULATIONS), AND GUIDELINES DATED NOVEMBER 5, 2019 ISSUED BY
SEBI UNDER THE FPI REGULATIONS.

Initiated By: SECURITIES AND EXCHANGE BOARD OF INDIA

Date Initiated: 07/26/2021

Docket/Case Number: SETTLEMENT APPLICATION NO. 4253 OF 2020

Principal Product Type: Other

Other Product Type(s): OFFSHORE DERIVATIVE INSTRUMENTS

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

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 07/26/2021

Sanctions Ordered: Monetary/Fine \$34,088.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS OF FACT AND CONCLUSIONS OF LAW, MLMS AGREED TO PAY INR 25,35,000 (APPROXIMATELY USD 34,088) TOWARDS THE SETTLEMENT TERMS. MLMS MADE THE PAYMENT IN FULL ON JUNE 25, 2021.

Firm Statement WITHOUT ADMITTING OR DENYING THE FINDINGS OF FACT AND CONCLUSIONS OF LAW, MLMS AGREED TO PAY INR 25,35,000 (APPROXIMATELY USD 34,088) TOWARDS THE SETTLEMENT TERMS. MLMS MADE THE PAYMENT IN FULL ON JUNE 25, 2021.

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Reporting Source: Firm

Affiliate: MERRILL LYNCH INTERNATIONAL

Current Status: Final

Allegations: ON APRIL 22, 2021, MERRILL LYNCH INTERNATIONAL ("MLI") WAS NOTIFIED THAT THE CAPITAL MARKETS BOARD OF TURKEY ("CMB") ISSUED A DECISION ALLEGING THAT MLI ENGAGED IN UNLAWFUL SHORT SELLING IN



VIOLATION OF ARTICLES 24 AND 28 OF THE COMMUNIQUE SERIAL: V, NO. 65 ON "MARGIN PURCHASE SHORT SALE BORROWING AND LENDING OF CAPITAL MARKET INSTRUMENTS."

Initiated By:	CAPITAL MARKETS BOARD OF TURKEY
Date Initiated:	04/22/2021
Docket/Case Number:	DECISION NO. 17/555
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	04/22/2021
Sanctions Ordered:	Monetary/Fine \$780,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	IN CONNECTION WITH THE DECISION, THE CMB ORDERED MLI TO PAY A FINE IN THE AMOUNT OF TRY 6,321,045 (APPROXIMATELY USD 780,000). IF MLI PAYS THE FINE WITHIN TWO MONTHS, THE FINE IS REDUCED BY 25 PERCENT.
Firm Statement	IN CONNECTION WITH THE DECISION, THE CMB ORDERED MLI TO PAY A FINE IN THE AMOUNT OF TRY 6,321,045 (APPROXIMATELY USD 780,000). IF MLI PAYS THE FINE WITHIN TWO MONTHS, THE FINE IS REDUCED BY 25 PERCENT.

Disclosure 62 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	ON APRIL 19, 2021, MERRILL LYNCH INTERNATIONAL ("MLI") WAS NOTIFIED THAT THE BOARD OF DIRECTORS OF THE HELLENIC CAPITAL MARKET COMMISSION ISSUED A DECISION ALLEGING THAT MLI VIOLATED ARTICLE 12 § 1(B) OF REGULATION (EU) NO 236/2012 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL ON SHORT SELLING AND CERTAIN ASPECTS OF CREDIT DEFAULT SWAPS, AS SPECIFIED IN THE PREAMBLE



(RECITAL 8) IN CONJUNCTION WITH ARTICLE 5 § 1(E) OF COMMISSION IMPLEMENTING REGULATION (EU) NO 827/2012, IN CONNECTION WITH CERTAIN SHORT SALES.

Initiated By:	HELLENIC CAPITAL MARKET COMMISSION
Date Initiated:	04/19/2021
Docket/Case Number:	DECISION NO. 6/897/20.11.2020
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	04/19/2021
Sanctions Ordered:	Monetary/Fine \$289,309.00
Other Sanctions Ordered:	N/A
Sanction Details:	IN CONNECTION WITH THE DECISION, THE HCMC ORDERED MLI TO PAY A FINE IN THE AMOUNT OF EUR 238,436.00 (APPROXIMATELY USD 289,309.00). IF MLI ACCEPTS THE DECISION AND PAYS THE FINE WITHIN TWO MONTHS, THE FINE IS REDUCED BY 20 PERCENT.
Firm Statement	IN CONNECTION WITH THE DECISION, THE HCMC ORDERED MLI TO PAY A FINE IN THE AMOUNT OF EUR 238,436.00 (APPROXIMATELY USD 289,309.00). IF MLI ACCEPTS THE DECISION AND PAYS THE FINE WITHIN TWO MONTHS, THE FINE IS REDUCED BY 20 PERCENT.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH COMMODITIES INC.
Current Status:	Final
Allegations:	THE NEW YORK MERCANTILE EXCHANGE ("NYMEX") ALLEGED THAT THE FIRM EXECUTED MULTIPLE NON-BONA FIDE EXCHANGE FOR RELATED POSITION ("EFRP") TRANSACTIONS IN CERTAIN FUTURES CONTRACTS IN VIOLATION OF NYMEX RULE 538.C. NYMEX FOUND THAT THE EFRP TRANSACTIONS WERE NON-BONA FIDE AS THEY WERE CONTINGENT UPON EACH OTHER AND WERE EXECUTED IN A MANNER DESIGNED TO



AVOID ANY MATERIAL MARKET RISK ASSOCIATED WITH THE EFRPS' RELATED POSITION COMPONENTS.

Initiated By: NEW YORK MERCANTILE EXCHANGE

Date Initiated: 10/23/2020

Docket/Case Number: NYMEX 19-1161-BC-4

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: Decision

Resolution Date: 10/23/2020

Sanctions Ordered: Monetary/Fine \$50,000.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THE RULE VIOLATIONS UPON WHICH THE PENALTY WAS BASED, THE FIRM AGREED TO PAY A FINE IN THE AMOUNT OF \$50,000.

Firm Statement WITHOUT ADMITTING OR DENYING THE RULE VIOLATIONS UPON WHICH THE PENALTY WAS BASED, THE FIRM AGREED TO PAY A FINE IN THE AMOUNT OF \$50,000.

Disclosure 64 of 170

Reporting Source: Firm

Affiliate: BOFA SECURITIES EUROPE SA

Current Status: Final

Allegations: THE FIRM PERMITTED A CLIENT TO ENTER A CROSS TRADE USING AN ORDER ROUTING SYSTEM PROVIDED BY THE FIRM ON ONE OCCASION IN VIOLATION OF NUMBER 2.6 OF THE CONDITIONS FOR TRADING AT EUREX DEUTSCHLAND.

Initiated By: EUREX DEUTSCHLAND

Date Initiated: 01/28/2020

Docket/Case Number: 2019/32



Principal Product Type:	Futures - Financial
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Reprimand
Other Sanction(s)/Relief Sought:	COSTS OF THE PROCEEDING
Resolution:	Decision
Resolution Date:	01/28/2020
Sanctions Ordered:	
Other Sanctions Ordered:	REPRIMAND, COSTS OF THE PROCEEDING
Sanction Details:	THE FIRM WAS ISSUED A REPRIMAND AND WAS REQUIRED TO BEAR THE COST OF THE PROCEEDING IN THE AMOUNT OF 500 EURO (APPROXIMATELY USD549).
Firm Statement	THE FIRM WAS ISSUED A REPRIMAND AND WAS REQUIRED TO BEAR THE COST OF THE PROCEEDING IN THE AMOUNT OF 500 EURO (APPROXIMATELY USD549).

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	THE CBOE FUTURES EXCHANGE ALLEGED THAT ON SIX TRADE DATES THE FIRM RECEIVED SIMULTANEOUS BUY AND SELL ORDERS IN THE SAME VX FUTURES CONTRACT EXPIRATION AT THE IDENTICAL PRICE TO BE GIVEN UP TO THE SAME CUSTOMER ACCOUNT, FAILED TO INQUIRE AS TO THE BENEFICIAL OWNERSHIP OF THE ORDERS, AND ACCOMMODATED THE EXECUTION OF MATCHING ORDERS IN VIOLATION OF CFE RULE 616.
Initiated By:	CBOE FUTURES EXCHANGE, LLC
Date Initiated:	01/16/2020
Docket/Case Number:	FILE NO. CFE 19-0006
Principal Product Type:	Futures - Financial
Other Product Type(s):	



Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	01/16/2020
Sanctions Ordered:	Monetary/Fine \$25,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THAT A VIOLATION OF EXCHANGE RULES HAD BEEN COMMITTED, THE FIRM AGREED TO PAY A FINE IN THE AMOUNT OF \$25,000.
Firm Statement	WITHOUT ADMITTING OR DENYING THAT A VIOLATION OF EXCHANGE RULES HAD BEEN COMMITTED, THE FIRM AGREED TO PAY A FINE IN THE AMOUNT OF \$25,000.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	ICE FUTURES US ALLEGED THAT THE FIRM MAY HAVE VIOLATED ICE FUTURES US RULE 4.07(C) BY MISREPORTING THE CORRECT EXECUTION TIME OF BLOCK TRADES AND SUBMITTING BLOCK TRADES BEYOND THE 15-MINUTE REPORTING WINDOW, ICE FUTURES US RULE 4.07(A)(II)(A) BY FAILING TO EXPLICITLY STATE THAT AN ORDER MAY BE EXECUTED BY MEANS OF A BLOCK TRADE, AND RULE 4.01(A) BY FAILING TO SUPERVISE THE EXCHANGE-RELATED ACTIVITIES OF ITS EMPLOYEES.
Initiated By:	ICE FUTURES US
Date Initiated:	11/15/2019
Docket/Case Number:	2018-033
Principal Product Type:	Futures - Financial
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:	11/15/2019
Sanctions Ordered:	Monetary/Fine \$200,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGED RULE VIOLATIONS, THE FIRM AGREED TO PAY A MONETARY PENALTY IN THE AMOUNT OF \$200,000.
Firm Statement	ICE FUTURES US NOTED THAT MLI TOOK REMEDIAL ACTIONS TO PREVENT THE REOCCURRENCE OF THE AFOREMENTIONED ACTIVITY AND COOPERATED WITH THE EXCHANGE'S MARKET REGULATION STAFF.

Disclosure 67 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH COMMODITIES, INC.
Current Status:	Final
Allegations:	ON NUMEROUS OCCASIONS FROM AT LEAST 2008 TO 2014, MERRILL LYNCH COMMODITIES, INC. ("MLCI"), BY AND THROUGH CERTAIN OF ITS TRADERS, PLACED ORDERS TO BUY OR SELL PRECIOUS METALS FUTURES CONTRACTS TRADED ON THE COMMODITY EXCHANGE, INC. WITH THE INTENT TO CANCEL THE ORDERS BEFORE EXECUTION IN VIOLATION OF SECTION 9(A)(2) OF THE COMMODITY EXCHANGE ACT (THE "ACT"), 7 U.S.C. § 13(A)(2) (2012) AND, FOR CONDUCT OCCURRING ON OR AFTER AUGUST 15, 2011, SECTIONS 4C(A)(5)(C), 6(C)(1), 6(C)(3) OF THE ACT, 7 U.S.C. §§ 6C(A)(5)(C), 9(1), 9(3) (2012), AND REGULATIONS 180.1 AND 180.2, 17 C.F.R. §§ 180.1, 180.2 (2019).
Initiated By:	U.S. COMMODITY FUTURES TRADING COMMISSION
Date Initiated:	06/25/2019
Docket/Case Number:	CFTC DOCKET NO. 19-07
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; DISGORGEMENT; RESTITUTION; UNDERTAKING
Resolution:	Order
Resolution Date:	06/25/2019
Sanctions Ordered:	Monetary/Fine \$11,500,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	N/A
Sanction Details:	(I) TO CEASE AND DESIST FROM VIOLATING SECTIONS 4C(A)(5), 6(C)(1), 6(C)(3), AND 9(A)(2) OF THE CEA AND REGULATIONS 180.1 AND 180.2 THEREUNDER; (II) PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$11,500,000; (III) PAY DISGORGEMENT IN THE AMOUNT OF \$11,100,000 (WHICH SHALL BE OFFSET, UP TO THE FULL AMOUNT, BY THE AMOUNT OF ANY PAYMENT MADE PURSUANT TO THE DOJ NON-PROSECUTION AGREEMENT ("NPA") FOR A SEPARATE BUT RELATED INVESTIGATION OF PRECIOUS METALS TRADING ACTIVITY); (IV) PAY RESTITUTION IN THE AMOUNT OF \$2,364,585 (WHICH SHALL BE OFFSET, UP TO THE FULL AMOUNT, BY THE AMOUNT OF ANY PAYMENT MADE PURSUANT TO THE NPA); AND (V) COMPLY WITH CERTAIN CONDITIONS AND UNDERTAKINGS SET FORTH IN THE CFTC ORDER. THE CIVIL MONETARY PENALTY WAS PAID ON JULY 1, 2019.
Firm Statement	ON JUNE 25, 2019, THE COMMODITY FUTURES TRADING COMMISSION ("CFTC") ISSUED AN ORDER (THE "CFTC ORDER") FINDING THAT, ON NUMEROUS OCCASIONS FROM AT LEAST 2008 TO 2014, MERRILL LYNCH COMMODITIES, INC. ("MLCI"), BY AND THROUGH CERTAIN OF ITS TRADERS, PLACED ORDERS TO BUY OR SELL PRECIOUS METALS FUTURES CONTRACTS TRADED ON THE COMMODITY EXCHANGE, INC. WITH THE INTENT TO CANCEL THE ORDERS BEFORE EXECUTION IN VIOLATION OF SECTION 9(A)(2) OF THE COMMODITY EXCHANGE ACT (THE "ACT"), 7 U.S.C. § 13(A)(2) (2012) AND, FOR CONDUCT OCCURRING ON OR AFTER AUGUST 15, 2011, SECTIONS 4C(A)(5)(C), 6(C)(1), 6(C)(3) OF THE ACT, 7 U.S.C. §§ 6C(A)(5)(C), 9(1), 9(3) (2012), AND REGULATIONS 180.1 AND 180.2, 17 C.F.R. §§ 180.1, 180.2 (2019). WITHOUT ADMITTING OR DENYING THE FINDINGS OR CONCLUSIONS IN THE CFTC ORDER, EXCEPT TO THE EXTENT ADMITTED IN A PARALLEL NON-PROSECUTION AGREEMENT ("NPA") WITH THE UNITED STATES DEPARTMENT OF JUSTICE, CRIMINAL DIVISION, FRAUD SECTION ("FRAUD SECTION"), MLCI CONSENTED TO THE IMPOSITION OF THE FOLLOWING: (I) TO CEASE AND DESIST FROM VIOLATING SECTIONS 4C(A)(5), 6(C)(1), 6(C)(3), AND 9(A)(2) OF THE ACT AND REGULATIONS 180.1 AND 180.2 THEREUNDER; (II) PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$11,500,000; (III) PAY DISGORGEMENT IN THE AMOUNT OF \$11,100,000 (WHICH SHALL BE OFFSET, UP TO THE FULL



AMOUNT, BY THE AMOUNT OF ANY PAYMENT MADE PURSUANT TO THE NPA); (IV) PAY RESTITUTION IN THE AMOUNT OF \$2,364,585 (WHICH SHALL BE OFFSET, UP TO THE FULL AMOUNT, BY THE AMOUNT OF ANY PAYMENT MADE PURSUANT TO THE NPA); AND (V) COMPLY WITH CERTAIN CONDITIONS AND UNDERTAKINGS SET FORTH IN THE CFTC ORDER. ON JUNE 25, 2019, MLCI ALSO ENTERED INTO AN NPA WITH THE FRAUD SECTION TO RESOLVE THE FRAUD SECTION'S SEPARATE, BUT RELATED INVESTIGATION OF PRECIOUS METALS TRADING ACTIVITY UNDER WHICH MLCI (I) ACCEPTED RESPONSIBILITY FOR THE ACTS OF ITS AGENTS AS SET FORTH IN THE NPA'S STATEMENT OF FACTS; (II) STIPULATED THAT THE FACTS DESCRIBED THEREIN ARE TRUE AND ACCURATE; AND (III) ACKNOWLEDGED THAT THE FACTS DESCRIBED THEREIN CONSTITUTE A VIOLATION OF 18 U.S.C. § 1348. UNDER THE NPA, MLCI FURTHER AGREED TO (I) PAY \$25,000,000 TO THE UNITED STATES, WHICH INCLUDES A CRIMINAL FINE, FORFEITURE, AND RESTITUTION; (II) CONTINUE TO IMPLEMENT A COMPLIANCE AND ETHICS PROGRAM DESIGNED TO PREVENT AND DETECT VIOLATIONS OF FEDERAL WIRE AND SECURITIES AND COMMODITIES FRAUD LAWS AND ANTI-SPOOFING PROVISION OF THE ACT; AND (III) UNDERTAKE CERTAIN OBLIGATIONS, GENERALLY FOR A THREE-YEAR TERM, CONCERNING COOPERATION, DISCLOSURE, AND REPORTING AS SET FORTH IN THE NPA. MLCI'S INDIRECT PARENT COMPANY, BANK OF AMERICA CORPORATION, ALSO AGREED TO UNDERTAKE CERTAIN OBLIGATIONS UNDER THE NPA.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH COMMODITIES, INC.
Current Status:	Final
Allegations:	THE NEW YORK MERCANTILE EXCHANGE ("NYMEX") ALLEGED THAT THE FIRM HELD A FUTURES POSITION WHICH WAS OVER THE FIRM'S APPROVED HEDGE EXEMPTION NATURAL GAS POSITION LIMIT IN VIOLATION OF NYMEX RULE 562.
Initiated By:	NEW YORK MERCANTILE EXCHANGE
Date Initiated:	04/22/2019
Docket/Case Number:	NYMEX 18-1025-BC
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: Decision

Resolution Date: 04/22/2019

Sanctions Ordered: Monetary/Fine \$75,000.00

Other Sanctions Ordered: N/A

Sanction Details: WITHOUT ADMITTING OR DENYING THE RULE VIOLATIONS UPON WHICH THE PENALTY WAS BASED, THE FIRM AGREED TO PAY A FINE IN THE AMOUNT OF \$75,000.

Firm Statement WITHOUT ADMITTING OR DENYING THE RULE VIOLATIONS UPON WHICH THE PENALTY WAS BASED, THE FIRM AGREED TO PAY A FINE IN THE AMOUNT OF \$75,000.

Disclosure 69 of 170
Reporting Source: Firm

Affiliate: BANK OF AMERICA, NATIONAL ASSOCIATION

Current Status: Final

Allegations: THE BANGKO SENTRAL NG PILIPINAS (BSP) APPROVED THE IMPOSITION OF A MONETARY PENALTY ON THE FIRM FOR NON-COMPLIANCE WITH THE 100.0 PERCENT EXPANDED/FOREIGN CURRENCY DEPOSIT UNIT (E/FCDU) ASSET COVER REQUIREMENT.

Initiated By: BANGKO SENTRAL NG PILIPINAS

Date Initiated: 04/11/2019

Docket/Case Number: NONE

Principal Product Type: Other

Other Product Type(s): FOREIGN EXCHANGE TRANSACTIONS

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

Other Sanction(s)/Relief Sought:
Resolution: Other

Resolution Date: 04/26/2019



Sanctions Ordered:	Monetary/Fine \$19,473.80
Other Sanctions Ordered:	THE MONETARY BOARD IMPOSED A PENALTY IN THE AMOUNT OF PHP1,011,442.07 (USD19,473.80) ON THE FIRM.
Sanction Details:	THE MONETARY BOARD IMPOSED A PENALTY IN THE AMOUNT OF PHP1,011,442 (USD19,473.80) ON THE FIRM. PURSUANT TO THE BSP'S RULES, THE FIRM'S DEMAND DEPOSIT ACCOUNT WITH THE BSP SHALL BE AUTOMATICALLY DEBITED THE ABOVE REFERENCED AMOUNT UPON THE LAPSE OF FIFTEEN CALENDAR DAYS FROM RECEIPT OF THE FINAL BILLING LETTER. THEREFORE, THE AMOUNT MAY BE DEBITED NO EARLIER THAN APRIL 26, 2019.
Firm Statement	THE MONETARY BOARD IMPOSED A PENALTY IN THE AMOUNT OF PHP1,011,442 (USD19,473.80) ON THE FIRM. PURSUANT TO THE BSP'S RULES, THE FIRM'S DEMAND DEPOSIT ACCOUNT WITH THE BSP SHALL BE AUTOMATICALLY DEBITED THE ABOVE REFERENCED AMOUNT UPON THE LAPSE OF FIFTEEN CALENDAR DAYS FROM RECEIPT OF THE FINAL BILLING LETTER. THEREFORE, THE AMOUNT MAY BE DEBITED NO EARLIER THAN APRIL 26, 2019.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH FAR EAST LIMITED
Current Status:	Final
Allegations:	THE SFC ALLEGED THAT THE FIRM FAILED TO DISCHARGE ITS DUTIES AS A SPONSOR IN RELATION TO A COMPANY'S LISTING APPLICATION FOR THE STOCK EXCHANGE OF HONG KONG LIMITED AND IN PARTICULAR FAILED TO (A) CONDUCT ADEQUATE AND REASONABLE DUE DILIGENCE INQUIRIES IN RELATION TO THE COMPANY'S LISTING APPLICATION AND USE ALL REASONABLE EFFORTS TO ENSURE THAT THE INFORMATION AND REPRESENTATIONS PROVIDED IN THE PROSPECTUS WERE TRUE, ACCURATE AND NOT MISLEADING; (B) PERFORM ADEQUATE AND REASONABLE DUE DILIGENCE INQUIRIES IN RELATION TO THE COMPANY'S CUSTOMERS; AND (C) COMPLY WITH ALL REGULATORY REQUIREMENTS APPLICABLE TO THE CONDUCT OF A SPONSOR.
Initiated By:	SECURITIES AND FUTURES COMMISSION - HONG KONG (SFC)
Date Initiated:	03/14/2019
Docket/Case Number:	N/A
Principal Product Type:	Equity Listed (Common & Preferred Stock)



Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	REPRIMAND
Resolution:	Other
Resolution Date:	03/14/2019
Sanctions Ordered:	Monetary/Fine \$16,333,440.00
Other Sanctions Ordered:	REPRIMAND
Sanction Details:	THE SFC REPRIMANDED THE FIRM AND FINED IT HK\$128 MILLION, WHICH IS APPROXIMATELY USD16,333,440.
Firm Statement	THE SFC REPRIMANDED THE FIRM AND FINED IT HK\$128 MILLION, WHICH IS APPROXIMATELY USD16,333,440.

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE RESERVE BANK OF INDIA ("RBI") ALLEGED THAT THE FIRM'S RECONCILIATION OF LOGS GENERATED FROM SWIFT WAS NOT SUFFICIENT AND VIOLATED THE DIRECTION OF THE RBI.
Initiated By:	RESERVE BANK OF INDIA ("RBI")
Date Initiated:	02/25/2019
Docket/Case Number:	EFD.CO.SO/590/02.03.044/2018-19
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:	02/25/2019



Sanctions Ordered:	Monetary/Fine \$144,952.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE RBI ORDERED THE FIRM TO PAY A MONETARY PENALTY IN THE AMOUNT OF INR10,000,000, WHICH IS APPROXIMATELY USD \$144,952.00.
Firm Statement	THE RBI ORDERED THE FIRM TO PAY A MONETARY PENALTY IN THE AMOUNT OF INR10,000,000, WHICH IS APPROXIMATELY USD \$144,952.00.

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE U.S. COMMODITY FUTURES TRADING COMMISSION (CFTC) ALLEGED THAT, ON OCCASION FROM JANUARY 2007 THROUGH DECEMBER 2012, THE FIRM, BY AND THROUGH CERTAIN OF ITS TRADERS, ATTEMPTED TO MANIPULATE THE U.S. DOLLAR INTERNATIONAL SWAPS AND DERIVATIVES ASSOCIATION FIX (USD ISDAFIX), A BENCHMARK RELATED TO INTEREST-RATE PRODUCTS, TO BENEFIT THE FIRM'S DERIVATIVES POSITIONS IN VIOLATION OF SECTION 9(A)(2) OF THE COMMODITY EXCHANGE ACT (CEA); SECTION 6(C) AND 6(D) OF THE CEA, FOR CONDUCT OCCURRING PRIOR TO AUGUST 15, 2011; AND SECTION 6(C)(1), 6(C)(1)(A), 6(C)(3) AND 6(D) OF THE CEA, AND REGULATIONS 180.1(A) AND 180.2, FOR CONDUCT OCCURRING ON OR AFTER AUGUST 15, 2011.
Initiated By:	U.S. COMMODITY FUTURES TRADING COMMISSION
Date Initiated:	09/19/2018
Docket/Case Number:	CFTC DOCKET NO. 18-34
Principal Product Type:	Other
Other Product Type(s):	U.S. DOLLAR INTERNATIONAL SWAPS AND DERIVATIVES ASSOCIATION FIX
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST; UNDERTAING
Resolution:	Order
Resolution Date:	09/19/2018
Sanctions Ordered:	Monetary/Fine \$30,000,000.00



Cease and Desist/Injunction

Other Sanctions Ordered:

UNDERTAKINGS

Sanction Details:

WITHOUT ADMITTING OR DENYING THE FINDINGS OR CONCLUSIONS IN THE ORDER, THE FIRM CONSENTED TO THE IMPOSITION OF THE FOLLOWING SANCTIONS: (1) TO CEASE AND DESIST FROM VIOLATING SECTIONS 6(C)(1), 6(C)(1)(A), 6(C)(3), 6(D), AND 9(A)(2) OF THE CEA AND REGULATIONS 180.1(A) AND 180.2 THEREUNDER, (2) TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$30,000,000, AND (3) TO COMPLY WITH CERTAIN UNDERTAKINGS.

Firm Statement

WITHOUT ADMITTING OR DENYING THE FINDINGS OR CONCLUSIONS IN THE ORDER, THE FIRM CONSENTED TO THE IMPOSITION OF THE FOLLOWING SANCTIONS: (1) TO CEASE AND DESIST FROM VIOLATING SECTIONS 6(C)(1), 6(C)(1)(A), 6(C)(3), 6(D), AND 9(A)(2) OF THE CEA AND REGULATIONS 180.1(A) AND 180.2, (2) TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$30,000,000, WHICH THE FIRM PAID ON SEPTEMBER 24, 2018, AND (3) CONTINUE TO UNDERTAKE CERTAIN REMEDIATION EFFORTS, INCLUDING PROVIDING A REPORT TO THE CFTC WITHIN 120 DAYS OF THE ORDER ADDRESSING REMEDIATION EFFORTS BOTH PRIOR TO AND SINCE ENTRY OF THE ORDER, AND PROVIDING AN ADDITIONAL REPORT TO THE CFTC, NO LATER THAN 365 DAYS FROM ENTRY OF THE ORDER, EXPLAINING HOW THE FIRM HAS COMPLIED WITH THE UNDERTAKINGS SET FORTH IN THE ORDER.

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Reporting Source:

Firm

Affiliate:

BANK OF AMERICA CORPORATION

Current Status:

Final

Allegations:

THE BAFIN ALLEGED THAT NECESSARY AND REASONABLE SUPERVISORY AND ORGANIZATIONAL MEASURES WHICH COULD HAVE ENSURED THE CORRECT AND COMPLETE SUBMISSION OF VOTING RIGHTS NOTIFICATIONS WITHIN THE TIME STIPULATED WERE NOT TAKEN ON TIME OR TO THE ADEQUATE EXTENT BY THE COMPANY CONCERNED, WHICH LED TO VIOLATIONS OF VOTING RIGHTS NOTIFICATION REQUIREMENTS.

Initiated By:

BUNDESANSTALT FUR FINANZDIENSTLEISTUNGSAUFSICHT (BAFIN)

Date Initiated:

04/23/2018

Docket/Case Number:

N/A

Principal Product Type:

No Product



Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	FEE FOR COSTS OF PROCEEDING
Resolution:	Other
Resolution Date:	05/14/2018
Sanctions Ordered:	Monetary/Fine \$1,635,872.00
Other Sanctions Ordered:	THE BAFIN IMPOSED A FINE ON THE FIRM IN THE AMOUNT OF EUR 1,340,000/USD 1,635,872 AND A FEE FOR COSTS OF THE PROCEEDING IN THE AMOUNT OF EUR 7,500/USD 9,156.
Sanction Details:	THE BAFIN IMPOSED A FINE ON THE FIRM IN THE AMOUNT OF EUR 1,340,000/USD 1,635,872 AND A FEE FOR COSTS OF THE PROCEEDING IN THE AMOUNT OF EUR 7,500/USD 9,156. THE EFFECTIVE DATE OF THE NOTICE IS TWO WEEKS AFTER THE DELIVERY OF THE NOTICE - DURING WHICH TIME THE FIRM CAN APPEAL THE NOTICE. THE FIRM DID NOT APPEAL THE NOTICE AND THE NOTICE BECAME EFFECTIVE ON MAY 14, 2018.
Firm Statement	THE BAFIN IMPOSED A FINE ON THE FIRM IN THE AMOUNT OF EUR 1,340,000/USD 1,635,872 AND A FEE FOR COSTS OF THE PROCEEDING IN THE AMOUNT OF EUR 7,500/USD 9,156. THE EFFECTIVE DATE OF THE NOTICE IS TWO WEEKS AFTER THE DELIVERY OF THE NOTICE - DURING WHICH TIME THE FIRM CAN APPEAL THE NOTICE. THE FIRM DID NOT APPEAL THE NOTICE AND THE NOTICE BECAME EFFECTIVE ON MAY 14, 2018.

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE SECURITIES AND EXCHANGE COMMISSION OF THE PHILIPPINES ("PHILIPPINES SEC") ALLEGED THAT THE FIRM DID NOT MEET CERTAIN REPORTING REQUIREMENTS IN THE PHILIPPINES REGARDING ITS REGIONAL AREA HEADQUARTERS ("RHQ"), WHICH HAD NOT ENGAGED IN ANY OPERATIONS IN THE PHILIPPINES FOR DECADES AND DID NOT PLAN TO ENGAGE IN ANY OPERATIONS IN THE PHILIPPINES IN THE FUTURE.
Initiated By:	SECURITIES AND EXCHANGE COMMISSION OF THE REPUBLIC OF THE



	PHILIPPINES
Date Initiated:	11/28/2017
Docket/Case Number:	N/A
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Suspension
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	11/28/2017
Sanctions Ordered:	Suspension
Other Sanctions Ordered:	N/A
Sanction Details:	THE PHILIPPINES SEC SUSPENDED THE FIRM'S RHQ LICENSE TO TRANSACT BUSINESS IN THE PHILIPPINES.
Firm Statement	AN RHQ IS A SPECIAL TYPE OF "BRANCH" WHOSE AUTHORIZED ACTIVITIES ARE LIMITED TO ACTING AS AN ADMINISTRATIVE BRANCH OF A MULTINATIONAL COMPANY ENGAGED IN INTERNATIONAL TRADE AND PRINCIPALLY SERVES AS A SUPERVISION, COMMUNICATIONS AND COORDINATION CENTER FOR ITS SUBSIDIARIES, BRANCHES OR AFFILIATES IN THE ASIA-PACIFIC REGION AND OTHER FOREIGN MARKETS. THE FIRM'S RHQ HAD BEEN DORMANT FOR DECADES AND DID NOT ENGAGE IN ANY SECURITIES ACTIVITIES. AS A MEANS TO DEREGISTER THE RHQ, THE FIRM REQUESTED THAT THE PHILIPPINES SEC SUSPEND ITS LICENSE AND THE PHILIPPINES SEC GRANTED THE FIRM'S REQUEST.

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE OFFICE OF ANTIBOYCOTT COMPLIANCE, BUREAU OF INDUSTRY AND SECURITY, U.S. DEPARTMENT OF COMMERCE ("BIS") ALLEGED, AS SET FORTH IN A PROPOSED CHARGING LETTER, THAT BANK OF AMERICA N.A. ("BOFA"), ON THIRTEEN OCCASIONS, VIOLATED THE EXPORT ADMINISTRATION REGULATIONS (CURRENTLY CODIFIED AT 15 C.F.R. 730-



774 (2017) ("REGULATIONS"), WHICH ARE ISSUED UNDER THE AUTHORITY OF THE EXPORT ADMINISTRATION ACT OF 1979, AS AMENDED. THE ALLEGATIONS WERE RESOLVED PURSUANT TO A SETTLEMENT AGREEMENT BETWEEN BIS AND BOFA. UNDER THE SETTLEMENT AGREEMENT, BIS ENTERED AN ORDER IMPOSING A CIVIL PENALTY, BUT DID NOT INITIATE ANY ADMINISTRATIVE OR JUDICIAL PROCEEDING OR MAKE A REFERRAL TO THE DEPARTMENT OF JUSTICE FOR CRIMINAL PROCEEDINGS AGAINST BOFA WITH RESPECT TO SECTION 8 OF THE EXPORT ADMINISTRATION ACT OR PART 760 OF THE REGULATIONS. NO FINDINGS OF VIOLATIONS WERE MADE.

Initiated By: OFFICE OF ANTIBOYCOTT COMPLIANCE, BUREAU OF INDUSTRY AND SECURITY, U.S. DEPARTMENT OF COMMERCE

Date Initiated: 11/13/2017

Docket/Case Number: CASE NO. 16-03

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: 11/13/2017

Sanctions Ordered: Monetary/Fine \$44,625.00

Other Sanctions Ordered: N/A

Sanction Details: PURSUANT TO THE SETTLEMENT AGREEMENT BETWEEN BOFA AND BIS, BIS ISSUED AN ORDER IMPOSING A CIVIL MONEY PENALTY OF \$44,625 ON BOFA. NO FINDINGS OF VIOLATIONS WERE MADE AND NO OTHER SANCTIONS WERE IMPOSED ON BOFA.

Firm Statement BOFA ENTERED INTO A SETTLEMENT AGREEMENT WITH BIS. THE SETTLEMENT AGREEMENT RESOLVED ALLEGATIONS BY THE BIS THAT BOFA, ON THIRTEEN OCCASIONS, VIOLATED THE EXPORT ADMINISTRATION REGULATIONS (CURRENTLY CODIFIED AT 15 C.F.R. 730-774 (2017) ("REGULATIONS"), WHICH ARE ISSUED UNDER THE AUTHORITY OF THE EXPORT ADMINISTRATION ACT OF 1979, AS AMENDED. UNDER THE SETTLEMENT AGREEMENT, BIS ENTERED AN ORDER IMPOSING A CIVIL PENALTY, BUT DID NOT INITIATE ANY ADMINISTRATIVE OR JUDICIAL PROCEEDING OR MAKE A REFERRAL TO THE DEPARTMENT OF JUSTICE FOR CRIMINAL PROCEEDINGS AGAINST BOFA WITH RESPECT TO SECTION



8 OF THE EXPORT ADMINISTRATION ACT OR PART 760 OF THE REGULATIONS. NO FINDINGS OF VIOLATIONS WERE MADE.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	THE FINANCIAL CONDUCT AUTHORITY (FCA) IMPOSED A FINANCIAL PENALTY ON THE FIRM FOR BREACHES OF PRINCIPLE 3 (MANAGEMENT AND CONTROL) OF THE FCA'S PRINCIPLES FOR BUSINESSES AND ARTICLE 9 OF THE EUROPEAN MARKETS INFRASTRUCTURE REGULATION (EMIR) IN CONNECTION WITH THE REPORTING OF EXCHANGE TRADED DERIVATIVES.
Initiated By:	FINANCIAL CONDUCT AUTHORITY
Date Initiated:	10/18/2017
Docket/Case Number:	NONE
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	10/23/2017
Sanctions Ordered:	Monetary/Fine \$45,525,500.00
Other Sanctions Ordered:	THE FCA IMPOSED A FINANCIAL PENALTY ON THE FIRM IN THE AMOUNT OF GBP34,524,000 (APPROX. USD45,525,500).
Sanction Details:	THE FCA IMPOSED A FINANCIAL PENALTY IN THE AMOUNT OF GBP34,524,000 (APPROX. USD45,525,500) ON THE FIRM.
Firm Statement	THE FCA IMPOSED A FINANCIAL PENALTY IN THE AMOUNT OF GBP34,524,000 (APPROX. USD45,525,500) ON THE FIRM.

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE BANGKO SENTRAL NG PILIPINAS (BS") APPROVED THE IMPOSITION OF A MONETARY PENALTY ON THE FIRM FOR THE FOLLOWING VIOLATIONS OF THE MANUAL OF REGULATIONS ON FOREIGN EXCHANGE TRANSACTIONS: DEFICIENCY IN E/FOREIGN CURRENCY DEPOSIT UNIT (FCDU) ASSET COVER REQUIREMENT, FALSE/ERRONEOUS CERTIFICATION OF COMPLIANCE WITH E/FCDU COVER AND BREACH ON THE CAP ON ALLOWABLE LENDING OF FCDU FUNDS TO REGULAR BANKING UNITS.
Initiated By:	BANGKO SENTRAL NG PILIPINAS
Date Initiated:	09/26/2017
Docket/Case Number:	NONE
Principal Product Type:	Other
Other Product Type(s):	FOREIGN EXCHANGE TRANSACTIONS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	10/12/2017
Sanctions Ordered:	Monetary/Fine \$1,306,930.00
Other Sanctions Ordered:	THE MONETARY BOARD IMPOSED A PENALTY IN THE AMOUNT OF PHP67,303,484.29 (APPROX. USD1,306,930) ON THE FIRM.
Sanction Details:	THE MONETARY BOARD IMPOSED A PENALTY IN THE AMOUNT OF PHP67,303,484.29 (APPROX. USD1,306,930) ON THE FIRM. PURSUANT TO THE BSP'S RULES, THE FIRM'S DEMAND DEPOSIT ACCOUNT WITH THE BSP SHALL BE AUTOMATICALLY DEBITED THE ABOVE REFERENCED AMOUNT UPON THE LAPSE OF FIFTEEN CALENDAR DAYS FROM RECEIPT OF THE FINAL BILLING LETTER. THEREFORE, THE AMOUNT MAY BE DEBITED NO EARLIER THAN OCTOBER 12, 2017.
Firm Statement	THE MONETARY BOARD IMPOSED A PENALTY IN THE AMOUNT OF PHP67,303,484.29 (APPROX. USD1,306,930) ON THE FIRM. PURSUANT TO THE BSP'S RULES, THE FIRM'S DEMAND DEPOSIT ACCOUNT WITH THE BSP SHALL BE AUTOMATICALLY DEBITED THE ABOVE REFERENCED AMOUNT UPON THE LAPSE OF FIFTEEN CALENDAR DAYS FROM RECEIPT OF THE



FINAL BILLING LETTER. THEREFORE, THE AMOUNT MAY BE DEBITED NO EARLIER THAN OCTOBER 12, 2017.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH (AUSTRALIA) FUTURES LIMITED
Current Status:	Final
Allegations:	DURING THE PERIOD BETWEEN OCTOBER 22, 2010 AND JUNE 20, 2016, MERRILL LYNCH (AUSTRALIA) FUTURES LIMITED ("MLAF") PROVIDED ACCESS TO THE ASX 24 MARKET USING SEVEN (7) PATHWAYS. IN 2016, AS THE RESULT OF AN AD HOC REVIEW OF MARKET LIMITS THAT APPLIED AT THE DOWNSTREAM LEVEL, MLAF IDENTIFIED FOUR (4) PATHWAYS THAT HAD INAPPROPRIATE LIMITS FOR MLAF AND ITS CLIENTS. THEREFORE, DURING THE RELEVANT PERIOD, ASIC HAS REASONABLE GROUNDS TO BELIEVE THAT MLAF CONTRAVENED RULE 2.2.1(1)(A) BY REASON OF FAILING TO SET AND DOCUMENT APPROPRIATE VOLUME LIMITS FOR EACH CLIENT ACCOUNT AND CONTRAVENED RULE 2.2.1(1)(B) BY REASON OF FAILING TO SET AND DOCUMENT APPROPRIATE MAXIMUM PRICE CHANGE LIMITS.
Initiated By:	AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION ("ASIC")
Date Initiated:	08/14/2017
Docket/Case Number:	MDP 6028/17
Principal Product Type:	Futures - Financial
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	08/14/2017
Sanctions Ordered:	Monetary/Fine \$47,355.50
Other Sanctions Ordered:	
Sanction Details:	PENALTY OF AUD\$60,000 (USD\$47,355.50).
Firm Statement	ASIC TOOK INTO ACCOUNT THE FOLLOWING MITIGATING FACTORS: MLAF



IDENTIFIED THE ISSUES FROM THEIR OWN REVIEW, SELF-REPORTED TO ASIC, PROMPTLY TOOK STEPS TO REMEDY THE BREACH ONCE MLAF BECAME AWARE OF IT, AND COOPERATED WITH ASIC FOLLOWING THE REPORT. THERE WAS NO APPARENT CLIENT OR MARKET IMPACT.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH COMMODITIES, INC.
Current Status:	Final
Allegations:	THE NEW YORK MERCANTILE EXCHANGE (NYMEX) ALLEGED THAT MERRILL LYNCH COMMODITIES, INC. ("MLCI") REACHED AN OPEN JANUARY 2017 CRUDE OIL FUTURES CONTRACT FUTURES POSITION OF 4,562 LONG CONTRACTS, WHICH WAS 1,562 CONTRACTS (52.06%) OVER THE STANDARD 3,000 CONTRACT POSITION LIMIT, IN VIOLATION OF NYMEX RULE 562, AND THAT MLCI REALIZED A PROFIT OF \$11,560.20 BY REDUCING ITS EXCESS POSITIONS.
Initiated By:	NEW YORK MERCANTILE EXCHANGE
Date Initiated:	06/14/2017
Docket/Case Number:	NYMEX 16-0597-BC
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:	DISGORGEMENT
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	06/16/2017
Sanctions Ordered:	Monetary/Fine \$25,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	DISGORGEMENT OF \$11,560.20
Sanction Details:	PURSUANT TO AN OFFER OF SETTLEMENT IN WHICH MLCI NEITHER ADMITTED NOR DENIED THE RULE VIOLATION UPON WHICH THE PENALTY WAS BASED, MLCI CONSENTED TO THE IMPOSITION OF THE FOLLOWING SANCTIONS: (1) A FINE IN THE AMOUNT OF \$25,000, AND (2) DISGORGEMENT OF PROFITS IN THE AMOUNT OF \$11,560.20.

**Firm Statement**

PURSUANT TO AN OFFER OF SETTLEMENT IN WHICH MLCI NEITHER ADMITTED NOR DENIED THE RULE VIOLATION UPON WHICH THE PENALTY WAS BASED, MLCI CONSENTED TO THE IMPOSITION OF THE FOLLOWING SANCTIONS: (1) A FINE IN THE AMOUNT OF \$25,000, AND (2) DISGORGEMENT OF PROFITS IN THE AMOUNT OF \$11,560.20.

Disclosure 80 of 170**Reporting Source:**

Firm

Affiliate:

MERRILL LYNCH COMMODITIES, INC.

Current Status:

Final

Allegations:

THE CHICAGO BOARD OF TRADE (CBOT) ALLEGED THAT MERRILL LYNCH COMMODITIES, INC. ("MLCI") HELD A FUTURES POSITION OF 660 SHORT MARCH 2017 SOYBEAN CONTRACTS WHICH WAS 60 CONTRACTS (10%) OVER THE SPOT MONTH LIMIT, IN VIOLATION OF CBOT RULE 562, AND THAT MLCI REALIZED A PROFIT OF \$124.20 FROM THE LIQUIDATION OF ITS EXCESS POSITION.

Initiated By:

CHICAGO BOARD OF TRADE

Date Initiated:

06/06/2017

Docket/Case Number:

CBOT-17-0661-BC

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:

DISGORGEMENT

Resolution:

Decision & Order of Offer of Settlement

Resolution Date:

06/08/2017

Sanctions Ordered:

Monetary/Fine \$35,000.00
Disgorgement/Restitution

Other Sanctions Ordered:

DISGORGEMENT OF \$124.20

Sanction Details:

PURSUANT TO AN OFFER OF SETTLEMENT IN WHICH MLCI NEITHER ADMITTED NOR DENIED THE RULE VIOLATIONS UPON WHICH THE PENALTY WAS BASED, MLCI CONSENTED TO THE IMPOSITION OF THE FOLLOWING SANCTIONS: (1) A FINE IN THE AMOUNT OF \$35,000, AND (2) DISGORGEMENT OF PROFITS IN THE AMOUNT OF \$124.20.

**Firm Statement**

PURSUANT TO AN OFFER OF SETTLEMENT IN WHICH MLCI NEITHER ADMITTED NOR DENIED THE RULE VIOLATIONS UPON WHICH THE PENALTY WAS BASED, MLCI CONSENTED TO THE IMPOSITION OF THE FOLLOWING SANCTIONS: (1) A FINE IN THE AMOUNT OF \$35,000, AND (2) DISGORGEMENT OF PROFITS IN THE AMOUNT OF \$124.20.

Disclosure 81 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	ICE FUTURES US, INC. ("IFUS") CONCLUDED THAT MERRILL LYNCH INTERNATIONAL ("MLI") MAY HAVE VIOLATED RULE 4.07(C) BY FAILING TO REPORT CERTAIN BLOCK AT INDEX CLOSE ("BIC") TRADES IN A TIMELY MANNER.
Initiated By:	ICE FUTURES US, INC.
Date Initiated:	04/04/2007
Docket/Case Number:	CASE NO. 2016-088
Principal Product Type:	Futures - Financial
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:	04/04/2007
Sanctions Ordered:	Monetary/Fine \$5,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	MLI WAS ISSUED A SUMMARY FINE IN THE AMOUNT OF \$5,000 PURSUANT TO IFUS DISCIPLINARY RULE 21.02.
Firm Statement	MLI WAS ISSUED A SUMMARY FINE IN THE AMOUNT OF \$5,000 PURSUANT TO IFUS DISCIPLINARY RULE 21.02.

Disclosure 82 of 170



Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	THE RESERVE BANK OF INDIA (RBI") CAME TO THE CONCLUSION THAT THERE WERE LAPSES ON THE PART OF BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) IN REPORTING OF THE NETTING OFF TRANSACTIONS ON GROSS BASIS IN R RETURNS, WHICH VIOLATED THE INSTRUCTION ISSUED BY THE RBI. THIS RESULTED IN THE TRANSACTIONS NOT BEING DETECTED/SCRUTINIZED FOR MORE THAN THREE YEARS (I.E., FROM 2012 TO 2015).
Initiated By:	RESERVE BANK OF INDIA ("RBI")
Date Initiated:	07/25/2016
Docket/Case Number:	FE.CO.EPD/5871/21.33.006/2016-17
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:	12/08/2016
Sanctions Ordered:	Monetary/Fine \$150.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE RESERVE BANK OF INDIA ORDERED BANK OF AMERICA, NATIONAL ASSOCIATION TO PAY MONETARY PENALTY IN THE AMOUNT OF 10,000 RUPEES, WHICH IS APPROXIMATELY USD150.
Firm Statement	THE RESERVE BANK OF INDIA ORDERED BANK OF AMERICA, NATIONAL ASSOCIATION TO PAY MONETARY PENALTY IN THE AMOUNT OF 10,000 RUPEES, WHICH IS APPROXIMATELY USD150.

Disclosure 83 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH (ASIA PACIFIC) LIMITED



Current Status:	Final
Allegations:	THIS DISCIPLINARY ACTION WAS TAKEN ACCORDING TO AN AGREEMENT PURSUANT TO SECTION 201 OF THE SECURITIES AND FUTURES ORDINANCE DATED MARCH 23, 2017 IN RELATION TO MERRILL LYNCH FAR EAST LIMITED'S AND MERRILL LYNCH (ASIA PACIFIC) LIMITED'S INTERNAL CONTROL FAILURES RELATED TO ITS REPORTING OF LARGE OPEN POSITIONS, ELECTRONIC TRADING SYSTEMS, DISTRIBUTION OF RESEARCH REPORTS INVOLVING FUTURES CONTRACTS, AND DISCLOSURE OF MARKET MAKING ACTIVITIES IN RESEARCH REPORTS.
Initiated By:	HONG KONG SECURITIES AND FUTURES COMMISSION
Date Initiated:	03/23/2017
Docket/Case Number:	NONE
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:	REPRIMAND; UNDERTAKING
Resolution:	Decision
Resolution Date:	03/23/2017
Sanctions Ordered:	Monetary/Fine \$1,931,134.00
Other Sanctions Ordered:	REPRIMAND AND UNDERTAKING
Sanction Details:	THE SECURITIES AND FUTURES COMMISSION HAS PUBLICLY REPRIMANDED AND FINED MERRILL LYNCH FAR EAST LIMITED AND MERRILL LYNCH (ASIA PACIFIC) LIMITED A TOTAL OF HKD15 MILLION (APPROXIMATELY USD1,931,134) PURSUANT TO SECTION 194 OF THE SECURITIES AND FUTURES ORDINANCE. IN ADDITION, MERRILL LYNCH FAR EAST LIMITED'S BOARD OF DIRECTORS HAVE UNDERTAKEN THAT THE PROBLEMS UNVEILED IN THE REVIEW FINDINGS CONCERNING THE COMPLIANCE WITH REQUIREMENTS FOR LOP REPORTING WILL BE RECTIFIED WITHIN 12 MONTHS AND WILL NOT REOCCUR AFTER 12 MONTHS
Firm Statement	IN REACHING THIS RESOLUTION, THE SECURITIES AND FUTURES COMMISSION (SFC) TOOK INTO ACCOUNT THAT MERRILL LYNCH FAR EAST LIMITED AND MERRILL LYNCH (ASIA PACIFIC) LIMITED SELF-REPORTED TO THE SFC THE UNLICENSED ACTIVITY AND NON-DISCLOSURE OF MARKET MAKING ACTIVITIES IN ITS RESEARCH REPORTS; INVOLVED THEIR SENIOR



MANAGEMENT IN THE LIAISON WITH THE SFC; TOO THE INITIATIVE TO BRING THIS MATTER TO AN EARLY CONCLUSION BY FULLY AND FRANKLY DISCUSSION THE REGULATORY CONCERNS WITH THE SFC; UNDERTOOK A CREDIBLE REVIEW WITH THE SEFC TO ADDRESS THE REGULATORY CONCERNS AND IDENTIFY THE DEFICIENCIES IN ITS INTERNAL CONTROLS; AND COOPERATED WITH THE DISCIPLINARY ACTION BY RESOLVING THE SFC'S REGULATORY CONCERNS. THE SFC ALSO TOOK INTO CONSIDERATION MERRILL LYNCH FAR EAST LIMITED'S BOARD OF DIRECTORS HAVE UNDERTAKEN THAT THE PROBLEMS UNVEILED IN THE REVIEW FINDINGS CONCERNING THE COMPLIANCE WITH REQUIREMENTS FOR LOP REPORTING WILL BE RECTIFIED WITHIN 12 MONTHS AND WILL NOT REOCCUR AFTER 12 MONTHS.

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH FAR EAST LIMITED
Current Status:	Final
Allegations:	THIS DISCIPLINARY ACTION WAS TAKEN ACCORDING TO AN AGREEMENT PURSUANT TO SECTION 201 OF THE SECURITIES AND FUTURES ORDINANCE DATED MARCH 23, 2017 IN RELATION TO MERRILL LYNCH FAR EAST LIMITED'S AND MERRILL LYNCH (ASIA PACIFIC) LIMITED'S INTERNAL CONTROL FAILURES RELATED TO ITS REPORTING OF LARGE OPEN POSITIONS, ELECTRONIC TRADING SYSTEMS, DISTRIBUTION OF RESEARCH REPORTS INVOLVING FUTURES CONTRACTS, AND DISCLOSURE OF MARKET MAKING ACTIVITIES IN RESEARCH REPORTS.
Initiated By:	HONG KONG SECURITIES AND FUTURES COMMISSION
Date Initiated:	03/23/2017
Docket/Case Number:	NONE
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:	REPRIMAND; UNDERTAKING
Resolution:	Decision
Resolution Date:	03/23/2017
Sanctions Ordered:	Monetary/Fine \$1,931,134.00



Other Sanctions Ordered:	REPRIMAND AND UNDERTAKING
Sanction Details:	THE SECURITIES AND FUTURES COMMISSION HAS PUBLICLY REPRIMANDED AND FINED MERRILL LYNCH FAR EAST LIMITED AND MERRILL LYNCH (ASIA PACIFIC) LIMITED A TOTAL OF HKD15 MILLION (APPROXIMATELY USD1,931,134) PURSUANT TO SECTION 194 OF THE SECURITIES AND FUTURES ORDINANCE. IN ADDITION, MERRILL LYNCH FAR EAST LIMITED'S BOARD OF DIRECTORS HAVE UNDERTAKEN THAT THE PROBLEMS UNVEILED IN THE REVIEW FINDINGS CONCERNING THE COMPLIANCE WITH REQUIREMENTS FOR LOP REPORTING WILL BE RECTIFIED WITHIN 12 MONTHS AND WILL NOT REOCCUR AFTER 12 MONTHS
Firm Statement	IN REACHING THIS RESOLUTION, THE SECURITIES AND FUTURES COMMISSION (SFC) TOOK INTO ACCOUNT THAT MERRILL LYNCH FAR EAST LIMITED AND MERRILL LYNCH (ASIA PACIFIC) LIMITED SELF-REPORTED TO THE SFC THE UNLICENSED ACTIVITY AND NON-DISCLOSURE OF MARKET MAKING ACTIVITIES IN ITS RESEARCH REPORTS; INVOLVED THEIR SENIOR MANAGEMENT IN THE LIAISON WITH THE SFC; TOOK THE INITIATIVE TO BRING THIS MATTER TO AN EARLY CONCLUSION BY FULLY AND FRANKLY DISCUSSING THE REGULATORY CONCERNS WITH THE SFC; UNDERTOOK A CREDIBLE REVIEW WITH THE SEFC TO ADDRESS THE REGULATORY CONCERNS AND IDENTIFY THE DEFICIENCIES IN ITS INTERNAL CONTROLS; AND COOPERATED WITH THE DISCIPLINARY ACTION BY RESOLVING THE SFC'S REGULATORY CONCERNS. THE SFC ALSO TOOK INTO CONSIDERATION MERRILL LYNCH FAR EAST LIMITED'S BOARD OF DIRECTORS HAVE UNDERTAKEN THAT THE PROBLEMS UNVEILED IN THE REVIEW FINDINGS CONCERNING THE COMPLIANCE WITH REQUIREMENTS FOR LOP REPORTING WILL BE RECTIFIED WITHIN 12 MONTHS AND WILL NOT REOCCUR AFTER 12 MONTHS.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	DUE TO A BOOKING ERROR ON A BLOCK OF KOREA EXCHANGE (KRX) LISTED ORDINARY SHARES MERRILL LYNCH INTERNATIONAL (MLI) WAS ENTITLED TO RECEIVE, A POSITION WAS DOUBLE BOOKED AND MLI SOLD MORE SHARES THAN IT HAD IN INVENTORY. THIS RESULTED IN MLI SELLING SHORT IN THE MARKET WITHOUT SUFFICIENT INVENTORY TO MEET SETTLEMENT OBLIGATIONS IN VIOLATION OF KRX LOCAL SHORT SALE REGULATIONS. AHEAD OF THE SETTLEMENT, MLI ARRANGED A BORROW TO ALLOW THE TRADE SETTLEMENT. THE KRX REPORTED THE



MATTER TO THE FINANCIAL SUPERVISORY SERVICE.

Initiated By: FINANCIAL SUPERVISORY SERVICE (SOUTH KOREA)

Date Initiated: 07/23/2015

Docket/Case Number:

Principal Product Type: Equity Listed (Common & Preferred Stock)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: CAUTION

Resolution: Other

Resolution Date: 11/10/2016

Sanctions Ordered:

Other Sanctions Ordered: MLI WAS ISSUED A CAUTION.

Sanction Details: MLI WAS ISSUED A CAUTION.

Firm Statement MLI WAS ISSUED A CAUTION.

Disclosure 85 of 170

Reporting Source: Firm

Affiliate: MERRILL LYNCH INTERNATIONAL

Current Status: Final

Allegations: THE SECURITIES AND FUTURES COMMISSION OF HONG KONG ("SFC") ALLEGED THAT BANK OF AMERICA, NATIONAL ASSOCIATION AND MERRILL LYNCH INTERNATIONAL (COLLECTIVELY, THE "RESPONDENTS") FAILED TO DISCLOSE DEALINGS IN RELEVANT SECURITIES IN TWO TRANSACTIONS IN 2015 AS REQUIRED BY THE HONG KONG CODE ON TAKEOVERS AND MERGERS.

Initiated By: SECURITIES AND FUTURES COMMISSION OF HONG KONG

Date Initiated: 06/29/2016

Docket/Case Number: N/A

Principal Product Type: Other



Other Product Type(s): EQUITY SWAPS

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 06/29/2016

Sanctions Ordered: Censure

Other Sanctions Ordered:

Sanction Details: THE SFC PUBLICLY CENSURED THE RESPONDENTS.

Firm Statement THE SFC PUBLICLY CENSURED THE RESPONDENTS.

Reporting Source: Firm

Affiliate: BANK OF AMERICA, NATIONAL ASSOCIATION

Current Status: Final

Allegations: THE SECURITIES AND FUTURES COMMISSION OF HONG KONG ("SFC") ALLEGED THAT BANK OF AMERICA, NATIONAL ASSOCIATION AND MERRILL LYNCH INTERNATIONAL (COLLECTIVELY, THE "RESPONDENTS") FAILED TO DISCLOSE DEALINGS IN RELEVANT SECURITIES IN TWO TRANSACTIONS IN 2015 AS REQUIRED BY THE HONG KONG CODE ON TAKEOVERS AND MERGERS.

Initiated By: SECURITIES AND FUTURES COMMISSION OF HONG KONG

Date Initiated: 06/29/2016

Docket/Case Number: N/A

Principal Product Type: Other

Other Product Type(s): EQUITY SWAPS

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 06/29/2016



Sanctions Ordered:	Censure
Other Sanctions Ordered:	
Sanction Details:	THE SFC PUBLICLY CENSURED THE RESPONDENTS.
Firm Statement	THE SFC PUBLICLY CENSURED THE RESPONDENTS.

Disclosure 86 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, N.A. (SINGAPORE BRANCH)
Current Status:	Final
Allegations:	ON FEBRUARY 15, 2016, BANK OF AMERICA, N.A./SINGAPORE BRANCH EXCEEDED THE PRESCRIBED NON-RESIDENT BAHT ACCOUNT (NRBAS) BALANCE LIMIT AS PRESCRIBED IN BANK OF THAILAND ("BOT") CIRCULAR NO. BOT.ECD.(02) C. 371/2551 RE: SEEING COOPERATION FOR COMPLIANCE WITH MEASURES TO PREVENT THAI BAHT SPECULATION.
Initiated By:	BANK OF THAILAND
Date Initiated:	02/15/2016
Docket/Case Number:	NONE
Principal Product Type:	Other
Other Product Type(s):	NON-RESIDENT BAHT ACCOUNT (NRBAS) BALANCES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	UNDERTAKING
Resolution:	Other
Resolution Date:	03/09/2016
Sanctions Ordered:	
Other Sanctions Ordered:	BANK OF AMERICA, N.A./SINGAPORE BRANCH WAS ASSESSED A PRESCRIBED PENALTY OF APPROXIMATELY US\$8,918.58. IN ADDITION, BOT REITERATED TO THE LOCAL BANK OF AMERICA BRANCH IN THAILAND (BANK OF AMERICA, N.A./BANGKOK BRANCH) ITS NEED TO HAVE STRICT MONITORING OF THAI BAHT LIMITS AND INFORM CLIENTS OF THIS REGULATION.
Sanction Details:	BANK OF AMERICA, N.A./SINGAPORE BRANCH WAS ASSESSED A



PREScribed PENALTY OF APPROXIMATELY US\$8,918.58. IN ADDITION, BOT REITERATED TO THE LOCAL BANK OF AMERICA BRANCH IN THAILAND (BANK OF AMERICA, N.A./BANGKOK BRANCH) ITS NEED TO HAVE STRICT MONITORING OF THAI BAHT LIMITS AND INFORM CLIENTS OF THIS REGULATION.

Firm Statement

BANK OF AMERICA, N.A./SINGAPORE BRANCH WAS ASSESSED A PRESCRIBED PENALTY OF APPROXIMATELY US\$8,918.58. IN ADDITION, BOT REITERATED TO THE LOCAL BANK OF AMERICA BRANCH IN THAILAND (BANK OF AMERICA, N.A./BANGKOK BRANCH) ITS NEED TO HAVE STRICT MONITORING OF THAI BAHT LIMITS AND INFORM CLIENTS OF THIS REGULATION.

Disclosure 87 of 170

Reporting Source:	Firm
Affiliate:	THE CITIZENS AND SOUTHERN NATIONAL BANK (N/K/A BANK OF AMERICA, N.A.)
Current Status:	Final
Allegations:	SEC ALLEGED THAT PUBLIC DISCLOSURE BY THE CITIENS AND SOUTHERN NATIONAL BANK (NKA BANK OF AMERICA, NATIONAL ASSOCIATION) (THE "GEORGIA BANK") CONTAINED UNTURE STATEMENTS OF MATERIAL FACTS OR FAILED TO DISCLOSE MATERIAL FACTS NECESSARY IN ORDER TO MAKE THE STATEMENTS MISLEADING
Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	12/01/1977
Docket/Case Number:	N/A
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	12/01/1977
Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	



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

Disclosure 88 of 170

Reporting Source:	Firm
Affiliate:	SEATTLE FIRST NATIONAL BANK
Current Status:	Final
Allegations:	VIOLETION OF SECTION 17(F)(1) OF THE SECURITIES AND EXCHANGE ACT OF 1934 AND RULE 17F1, PROMULGATED THEREUNDER.
Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	07/01/1994
Docket/Case Number:	3-9409
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	07/05/1994
Sanctions Ordered:	Monetary/Fine \$75,000.00 Cease and Desist/Injunction

**Other Sanctions Ordered:****Sanction Details:**

WITHOUT ADMITTING OR DENYING THE MATTERS ASSERTED THEREIN, SEATTLE-FIRST NATIONAL BANK ("SEAFIRST") A WHOLLY OWNED SUBSIDIARY OF SEAFIRST CORPORATION AND BANKAMERICA CORPORATION ENTERED INTO A JOINT CONSENT CEASE AND DESIST ORDER WITH THE SEC AND THE OCC. THE ORDER FOUND THAT SEAFIRST VIOLATED SECTIONS 17F1 OF THE SECURITIES EXCHANGE ACT OF '34 AND RULE 17F1 PROMULGATED THEREUNDER, PROHIBITED VIOLATIONS IN THE FUTURE, AND REQUIRED SEAFIRST FO PAY A CIVIL MONEY PENALTY OF \$75,000.

Firm Statement

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

Disclosure 89 of 170**Reporting Source:**

Firm

Affiliate:

SEATTLE FIRST NATIONAL BANK

Current Status:

Final

Allegations:

VIOLATION OF SECTION 17(F)(1) OF THE SECURITIES AND EXCHANGE ACT OF 1934 AND RULE 17F1, PROMULGATED THEREUNDER.

Initiated By:

COMPTROLLER OF THE CURRENCY

Date Initiated:

06/30/1994

Docket/Case Number:

EA-94-4

Principal Product Type:

No Product

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

Cease and Desist

Other Sanction(s)/Relief Sought:**Resolution:**

Consent

Resolution Date:

07/05/1994

Sanctions Ordered:

Monetary/Fine \$75,000.00
Cease and Desist/Injunction

**Other Sanctions Ordered:****Sanction Details:**

WITHOUT ADMITTING OR DENYING THE MATTERS ASSERTED THEREIN, SEATTLE-FIRST NATIONAL BANK ("SEAFIRST") A WHOLLY OWNED SUBSIDIARY OF SEAFIRST CORPORATION AND BANKAMERICA CORPORATION ENTERED INTO A JOINT CONSENT CEASE AND DESIST ORDER WITH THE SEC AND THE OCC. THE ORDER FOUND THAT SEAFIRST VIOLATED SECTIONS 17F1 OF THE SECURITIES EXCHANGE ACT OF '34 AND RULE 17F1 PROMULGATED THEREUNDER, PROHIBITED VIOLATIONS IN THE FUTURE, AND REQUIRED SEAFIRST TO PAY A CIVIL MONEY PENALTY OF \$75,000.

Firm Statement

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

Disclosure 90 of 170**Reporting Source:**

Firm

Affiliate:

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

Current Status:

Final

Allegations:

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

Initiated By:

NEW YORK STATE BANKING DEPARTMENT

Date Initiated:

07/12/2001

Docket/Case Number:

01-010-B-HC/01-010-CMP-HC

Principal Product Type:

No Product

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

Cease and Desist


Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 07/12/2001

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

Other Sanctions Ordered:

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

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

Reporting Source: Firm

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

Current Status: Final

Allegations: THE FEDERAL RESERVE BOARD AND THE NEW YORK STATE BANKING DEPARTMENT ALLEGED VIOLATIONS AND DEFICIENCIES RELATING TO THE LACK OF INTERNAL CONTROLS AND PROCEDURES AND INADEQUATE COMPLIANCE WITH THE BANK SECRECY ACT, AND THE FAILURE TO MAINTAIN ACCURATE AND COMPLETE BOOKS AND RECORDS IN CONNECTION WITH THE OPERATIONS AND ACTIVITIES OF THE STRATEGIC TRADING GROUP OF UNITED STATES TRUST COMPANY OF NEW YORK



(EFFECTIVE 3/31/2006, UNITED STATES TRUST COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.)

Initiated By:	NEW YORK STATE BANKING DEPARTMENT
Date Initiated:	07/12/2001
Docket/Case Number:	01-010-B-HC/01-010-CMP-HC
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	07/12/2001
Sanctions Ordered:	Monetary/Fine \$5,000,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON JULY 11,2001, U.S. TRUST CORPORATION AND UNITED STATES TRUST COMPANY OF NEW YORK (EFFECTIVE 3/31/2006, UNITED STATES TRUST COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.) PAID TO THE FEDERAL RESERVE BOARD A CIVIL MONEY PENALTY IN THE AMOUNT OF \$5 MILLION AND MADE A \$5 MILLION MONETARY PAYMENT TO THE STATE OF NEW YORK.
Firm Statement	U.S. TRUST CORPORATION AND UNITED STATES TRUST COMPANY OF NEW YORK (EFFECTIVE 3/31/2006, UNITED STATES TRUST COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.), WITHOUT ADMITTING TO ANY ALLEGATIONS, CONSENTED ON JULY 12, 2001, TO THE ISSUANCE OF THE ORDER TO CEASE AND DESIST AND ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY AND MONETARY PAYMENT ISSUED UPON CONSENT IN CONNECTION WITH THE ALLEGED VIOLATIONS AND DEFICIENCIES RELATING TO THE LACK OF INTERNAL CONTROLS AND PROCEDURES AND INADEQUATE COMPLIANCE WITH THE BANK SECRECY ACT, AND RELATING TO THE FAILURE TO MAINTAIN ACCURATE AND COMPLETE BOOKS AND RECORDS IN CONNECTION WITH THE OPERATIONS AND ACTIVITIES OF THE STRATEGIC TRADING GROUP OF UNITED STATES TRUST COMPANY OF NEW YORK (AS OF 4/1/06 UNITED STATES TRUST COMPANY, N.A.)



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

**Firm Statement**

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

Reporting Source:

Firm

Affiliate:

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

Current Status:

Final

Allegations:

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

Initiated By:

FEDERAL RESERVE BOARD

Date Initiated:

07/12/2001

Docket/Case Number:

01-010-B-HC/01-010-CMP-HC

Principal Product Type:

No Product

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

Cease and Desist

Other Sanction(s)/Relief Sought:



Resolution:	Order
Resolution Date:	07/12/2001
Sanctions Ordered:	Monetary/Fine \$5,000,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON JULY 11,2001, U.S. TRUST CORPORATION AND UNITED STATES TRUST COMPANY OF NEW YORK (EFFECTIVE 3/31/2006, UNITED STATES TRUST COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.) PAID TO THE FEDERAL RESERVE BOARD A CIVIL MONEY PENALTY IN THE AMOUNT OF \$5 MILLION AND MADE A \$5 MILLION MONETARY PAYMENT TO THE STATE OF NEW YORK.
Firm Statement	U.S. TRUST CORPORATION AND UNITED STATES TRUST COMPANY OF NEW YORK (EFFECTIVE 3/31/2006, UNITED STATES TRUST COMPANY OF NEW YORK ENGAGED IN A CHARTER CONVERSION INTO UNITED STATES TRUST COMPANY, N.A.), WITHOUT ADMITTING TO ANY ALLEGATIONS, CONSENTED ON JULY 12, 2001, TO THE ISSUANCE OF THE ORDER TO CEASE AND DESIST AND ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY AND MONETARY PAYMENT ISSUED UPON CONSENT IN CONNECTION WITH THE ALLEGED VIOLATIONS AND DEFICIENCIES RELATING TO THE LACK OF INTERNAL CONTROLS AND PROCEDURES AND INADEQUATE COMPLIANCE WITH THE BANK SECRECY ACT, AND RELATING TO THE FAILURE TO MAINTAIN ACCURATE AND COMPLETE BOOKS AND RECORDS IN CONNECTION WITH THE OPERATIONS AND ACTIVITIES OF THE STRATEGIC TRADING GROUP OF UNITED STATES TRUST COMPANY OF NEW YORK (AS OF 4/1/06 UNITED STATES TRUST COMPANY, N.A.)

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Reporting Source:	Firm
Affiliate:	NATIONSBANK, N.A. (NKA BANK OF AMERICA, N.A.)
Current Status:	Final
Allegations:	ALLEGED THAT NATIONSBANK, N.A. (NKA BANK OF AMERICA, N.A.) WAS A CAUSE OF NATIONSSECURITIES' (NKA BANC OF AMERICA SECURITIES LLC), A FORMER AFFILIATE BROKER/DEALER, VIOLATION OF SECTION 17(A)(2) & (3) OF THE SECURITIES ACT IN REGARDS TO SUPERVISING REGISTERED REPRESENTATIVES IN ASSOCIATION WITH THE INITIAL PUBLIC OFFERING OF SHARES OF THE NATIONSL GOVERNMENT INCOME TERM TRUST 2003, INC. AND NATIONS FOVERNMENT INCOME TERM TRUST 2004, INC.
Initiated By:	SECURITIES AND EXCHANGE COMMISSION



Date Initiated: 05/04/1998

Docket/Case Number: 3-9596

Principal Product Type: Unit Investment Trust(s)

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 05/04/1998

Sanctions Ordered: Cease and Desist/Injunction

Other Sanctions Ordered:

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

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Reporting Source: Firm

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

Current Status: Final

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

Initiated By: OFFICE OF THE COMPTROLLER OF THE CURRENCY

Date Initiated: 05/04/1998

Docket/Case Number: N/A

Principal Product Type: Unit Investment Trust(s)



Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	STIPULATION AND CONSENT ORDER
Resolution:	Settled
Resolution Date:	05/04/1998
Sanctions Ordered:	Monetary/Fine \$750,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING CHARGES, NATIONSBANK, N.A. (NKA BANK OF AMERICA, N.A.) CONSENTED TO PAY A CIVIL MONEY PENALTY OF \$750,000.
Firm Statement	WITHOUT ADMITTING OR DENYING CHARGES, NATIONSBANK, N.A. (NKA BANK OF AMERICA, N.A.) CONSENTED TO PAY A CIVIL MONEY PENALTY OF \$750,000.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH (SINGAPORE) PTE. LTD.
Current Status:	Final
Allegations:	ON SEPTEMBER 8, 2014, MERRILL LYNCH (SINGAPORE) PTE. WAS LATE IN REPORTING TWO MARRIED TRADES TO THE SGX WHICH WAS NOT IN COMPLIANCE WITH SGX-ST RULE 8.7.5 WHICH REQUIRES MARRIED TRADES TO BE REPORTED IN THE FIRST 20 MINUTES OF THE OPENING ROUTINE ON THE FOLLOWING MARKET DAY.
Initiated By:	SINGAPORE EXCHANGE ("SGX")
Date Initiated:	12/09/2014
Docket/Case Number:	SUR/ENF/2014/10/14
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)


Other Sanction(s)/Relief Sought:

Resolution:	Decision
Resolution Date:	12/12/2014
Sanctions Ordered:	Monetary/Fine \$5,330.68
Other Sanctions Ordered:	N/A
Sanction Details:	THE SGX FINED MERRILL LYNCH (SINGAPORE) PTE. LTD. SGD\$7,000 (APPROXIMATELY USD\$5,330.68). MERRILL LYNCH (SINGAPORE) PTE. LTD. PAID THE FINE ON DECEMBER 12, 20014 AND THE SGX ACKNOWLEDGE RECEIPT OF THE PAYMENT ON DECEMBER 16, 2014.
Firm Statement	THE LATE REPORTING OCCURRED WHEN A SYSTEM UPGRADE FAILED TO RECOGNIZE THE COMMAND TO SEND NOTICE OF THE MARRIED TRADES SGX. THIS FAILURE WILL BE INCORPORATED INTO TESTING PROTOCOLS FOR FUTURE UPGRADES. MERRILL LYNCH (SINGAPORE) PTE. LTD. SELF-REPORTED THE MATTER TO THE SGX AS SOON AS IT WAS DISCOVERED.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL BANK LIMITED
Current Status:	Final
Allegations:	THE SFA HAS DECIDED TO INSTITUTE DISCIPLINARY PROCEEDINGS AGAINST MLIB ON THE GROUNDS THAT MLIB VIOLATED CERTAIN FSA PRINCIPLES ARISING FROM A MISAPPROPRIATION BY A FORMER MLIB EMPLOYEE.
Initiated By:	SECURITIES AND FUTURES AUTHORITY LIMITED ("SFA")
Date Initiated:	05/23/2001
Docket/Case Number:	N/A
Principal Product Type:	Other
Other Product Type(s):	TREASURY BONDS - FLOATING RATE NOTES, ZERO COUPON NOTES AND CASH.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	



Resolution:	Other
Resolution Date:	05/23/2001
Firm Statement	MLIB IMMEDIATELY TOOK THE APPROPRIATE STEPS TO COMPENSATE THE CUSTOMER, TOOK OTHER CORRECTIVE ACTION AND HAS COOPERATED FULLY WITH THE SFA.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL BANK LIMITED
Current Status:	Final
Allegations:	IT WAS ALLEGED THE MLIB FAILED TO ACT WITH DUE SKILL, CARE AND DILIGENCE AND FAILED TO ARRANGE PROPER PROTECTION FOR A CLIENT'S ASSETS IN INSTRUCTING THE TRANSFERS OF NINE SECURITIES, IN BREACH OF PRINCIPLES 2 AND 7 OF SFA'S STATEMENTS OF PRINCIPLE.
Initiated By:	THE SECURITIES AND FUTURES AUTHORITY LIMITED ("SFA")
Date Initiated:	04/03/2002
Docket/Case Number:	UNKNOWN
Principal Product Type:	Debt - Government
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	REPRIMAND
Resolution:	Settled
Resolution Date:	04/03/2002
Sanctions Ordered:	Censure Monetary/Fine \$177,500.00
Other Sanctions Ordered:	
Sanction Details:	MLIB ENTERED INTO A SETTLEMENT WITH THE SFA WAS REPRIMANDED, FINED \$177,500 AND HAS AGREED TO PAY A CONTRIBUTION OF \$56,800 TOWARDS SFA'S COSTS.
Firm Statement	MLIB ENTERED INTO A SETTLEMENT WITH THE SFA WAS REPRIMANDED, FINED \$177,500 AND HAS AGREED TO PAY A CONTRIBUTION OF \$56,800



TOWARDS SFA'S COSTS.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL BANK LIMITED
Current Status:	Final
Allegations:	MERRILL LYNCH INTERNATIONAL BANK LIMITED ("MLIB") BREACHED SECTION 99B(3) OF THE SECURITIES AND FUTURES ACT ("SFA") BETWEEN NOVEMBER 26, 2010 AND AUGUST 31, 2011 WHEN MLIB PERMITTED 90 OF ITS REPRESENTATIVES TO CARRY OUT THE REGULATED ACTIVITY OF FUND MANAGEMENT BEFORE THE REGULATED ACTIVITY WAS DULY REFLECTED AGAINST THEIR NAMES IN THE PUBLIC REGISTER.
Initiated By:	MONETARY AUTHORITY OF SINGAPORE ("MAS")
Date Initiated:	03/09/2011
Docket/Case Number:	CMI FA 04/2003 PT 17/ST
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:	Decision & Order of Offer of Settlement
Resolution Date:	12/19/2011
Sanctions Ordered:	Monetary/Fine \$20,722.36
Other Sanctions Ordered:	MLIB'S AGREEMENT THAT THE OFFENCE BE DEALT WITH UNDER SECTION 336 OF THE SFA READ WITH REGULATION 2 OF THE SECURITIES AND FUTURES (COMPOSITION OF OFFENCES) REGULATIONS ("SFR"), AND MLIB'S ACCEPTANCE OF THE OFFER OF COMPOSITION MADE BY MAS. MLIB AGREED TO THE OFFENCE BEING DEALT WITH UNDER SECTION 336 OF THE SFA READ WITH REGULATION 2 OF THE SFR AND ACCEPTED THE OFFER OF COMPOSITION FROM MAS ON DECEMBER 19, 2011.
Sanction Details:	MLIB AGREED TO THE OFFENCE BEING DEALT WITH UNDER SECTION 336 OF THE SFA READ WITH REGULATION 2 OF THE SFR AND ACCEPTED THE OFFER OF COMPOSITION FROM MAS ON DECEMBER 19, 2011. IN ADDITION, MLIB PAID THE FINE OF SGD\$27,000 (APPROXIMATELY



USD\$20,722.36) ON DECEMBER 19, 2011.

Firm Statement

MLIB AGREED TO THE OFFENCE BEING DEALT WITH UNDER SECTION 336 OF THE SFA READ WITH REGULATION 2 OF THE SFR AND ACCEPTED THE OFFER OF COMPOSITION FROM MAS ON DECEMBER 19, 2011. IN ADDITION, MLIB PAID THE FINE OF SGD\$27,000 (APPROXIMATELY USD\$20,722.36) ON DECEMBER 19, 2011.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL BANK LIMITED
Current Status:	Final
Allegations:	THERE WERE TWO SEPARATE INCIDENTS IN WHICH TRADERS FAILED TO APPROPRIATELY VALUE THEIR POSITIONS AND WHICH OCCURRED IN THE LONDON BRANCH OF MERRILL LYNCH INTERNATIONAL BANK LIMITED ("MLIB"). THE FIRST INCIDENT OCCURRED BETWEEN DECEMBER 2008 AND FEBRUARY 2009, RESULTING IN LOSSES TO MLIB OF \$456 MILLION. THE SECOND OCCURRED BETWEEN MAY AND AUGUST 2009, RESULTING IN LOSSES OF \$5.3 MILLION. FULL DETAILS OF THE SECOND INCIDENT WERE NOTIFIED TO THE FINANCIAL REGULATOR DURING THE COURSE OF THE EXAMINATION INTO THE FIRST INCIDENT. BREACHES OF REGULATORY REQUIREMENTS COMMENT TO BOTH INCIDENTS WERE A FAILURE TO HAVE IN PLACE A WELL DEFINED AND TRANSPARENT LINE OF SUPERVISORY RESPONSIBILITY; A FAILURE TO SUPERVISE THE TRADER'S ACTIVITY AND AN INADEQUATE MONTH END INDEPENDENT PRICE VERIFICATION PROCESS. IN RELATION TO THE FIRST INCIDENT, IT WAS ALSO FOUND THAT THERE WAS A FAILURE TO MANAGE EFFECTIVELY MARKET RISK LIMITS IN RESPECT OF THE TRADER'S ACTIVITIES.
Initiated By:	FINANCIAL REGULATOR (RIALTOIR AIRGAEDAIS) IN IRELAND
Date Initiated:	10/22/2009
Docket/Case Number:	NONE
Principal Product Type:	Other
Other Product Type(s):	DEBT-GOVERNMENT, FORWARD RATE AGREEMENTS, OVERNIGHT INDEX SWAPS, OPTIONS, FX SPOT/FORWARDS AND OPTIONS, CROSS CURRENCY SWAPS, AND INTEREST RATES SWAPS.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	OTHER: REPRIMAND



Resolution:	Settled
Resolution Date:	10/22/2009
Sanctions Ordered:	Monetary/Fine \$4,131,600.00
Other Sanctions Ordered:	THE FINANCIAL REGULATOR REPRIMANDED MLIB AND REQUIRED MLIB TO PAY A MONETARY PENALTY IN THE SUM 2,750,000 EUROS (APPROXIMATELY \$4,131,600.00 IN US DOLLARS).
Sanction Details:	THE FINANCIAL REGULATOR REPRIMANDED MLIB AND REQUIRED MLIB TO PAY A MONETARY PENALTY IN THE SUM 2,750,000 EUROS (APPROXIMATELY \$4,131,600.00 IN US DOLLARS).
Firm Statement	THE FINANCIAL REGULATOR REPRIMANDED MLIB AND REQUIRED MLIB TO PAY A MONETARY PENALTY IN THE SUM 2,750,000 EUROS (APPROXIMATELY \$4,131,600.00 IN US DOLLARS). MLIB PROMPTLY NOTIFIED THE FINANCIAL REGULATOR IN RESPECT OF EACH INCIDENT, COMMISSIONED FULL INVESTIGATIONS AND SUBSEQUENTLY SUBMITTED DETAILED REPORTS OF EACH INVESTIGATION TO THE FINANCIAL REGULATOR. MLIB FULLY CO-OPERATED WITH THE FINANCIAL REGULATOR AND HAS BEEN OPEN AND TRANSPARENT THROUGHOUT THE EXAMINATION. MLIB CONFIRMS THAT IT HAS TAKEN COMPLETE REMEDIAL ACTION TO FULLY RECTIFY THE BREACHES.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	GEMINI COMMUNICATIONS LTD (GCL") HAD ISSUED EURO 15 MILLION AT 6% FOREIGN CURRENCY CONVERTIBLE BONDS ("FCCBS") TO MERRILL LYNCH INTERNATIONAL ("MLI") ON JULY 17, 2007 WITH A MATURITY DATE OF JULY 18, 2012. MLI HAD THE RIGHT CONVERT THE FCCBS INTO 19,746,885 EQUITY SHARES OF GCL (REPRESENTING 15.59% OF THE TOTAL SHARE CAPITAL OF GCL) AT A CONVERSION PRICE SPECIFIED FROM TIME TO TIME DURING THE CONVERSION PERIOD (I.E., BETWEEN AUGUST 1, 2007 AND JUNE 18, 2012). FURTHER, AS PER THE TERMS OF THE FCCBS THE CONVERSION OPTION OF MLI REVIVES IF (A)AN EVENT OF DEFAULT OCCURS; OR (B) FCCBS ARE NOT REDEEMED ON THE MATURITY DATE. ON 26TH OCTOBER 26, 2012, MLI FILED A DISCLOSURE UNDER THE TERMS OF REGULATION 29(2) OF THE SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVER) REGULATIONS, 2011 ("TAKEOVER REGULATIONS") READ WITH REGULATION 28(2) OF THE TAKEOVER REGULATIONS IN RELATION TO CESSATION OF THE RIGHT TO CONVERT



THE FCCBS. THEREAFTER, ON NOVEMBER 12, 2012, MLI MADE A DISCLOSURE UNDER REGULATIONS 29(1) OF THE TAKEOVER REGULATIONS WITH RESPECT TO REVIVAL OF THE RIGHT TO CONVERT THE FCCBS INTO EQUITY SHARES OF GCL DUE TO DEFAULT OF PAYMENT OF GCL UPON MATURITY OF THE FCCBS. SEBI ISSUED A SHOW CAUSE NOTICE ON APRIL 5, 2013 IN WHICH IT ALLEGED THAT MLI HAS NOT MADE THE DISCLOSURES IN RELATION TO CESSATION AND REVIVAL OF THE CONVERSION RIGHT IN ACCORDANCE WITH REGULATION 29(1), (2) READ WITH REGULATION 29(3) AND 28(2) OF THE TAKEOVER REGULATIONS. SPECIFICALLY, SEBI HAS ALLEGED THAT (A) THE DISCLOSURE IN RELATION TO CESSATION OF THE RIGHT TO CONVERT THE FCCBS WAS REQUIRED TO BE DISCLOSED BY JUNE 20, 2012; HOWEVER THE NECESSARY DISCLOSURE WAS MADE BY MLI ON OCTOBER 26, 2012, AFTER DELAY OF MORE THAN 4 MONTHS; AND (II) THE DISCLOSURE IN RELATION TO REVIVAL OF THE CONVERSION RIGHT WAS REQUIRED TO BE MADE BY JULY 20, 2012; HOWEVER, THE NECESSARY DISCLOSURE WAS MADE BY MLI ON NOVEMBER 12, 2012, AFTER A DELAY OF 3 MONTHS AND 22 DAYS.

Initiated By:	SECURITIES AND EXCHANGE BOARD OF INDIA ("SEBI")
Date Initiated:	06/06/2014
Docket/Case Number:	EFD / DRA-1 / OW / 16186 / 2014
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:	06/06/2014
Sanctions Ordered:	Monetary/Fine \$68,170.94
Other Sanctions Ordered:	N/A
Sanction Details:	SEBI HAS AGREED IN PRINCIPAL TO ACCEPT THE TERMS OF THE CONSENT PROPOSED BY MLI. SEBI HAS AGREED TO A SETTLEMENT AMOUNT OF INR40,34,185(USD68,170.94).
Firm Statement	SEBI HAS AGREED IN PRINCIPAL TO ACCEPT THE TERMS OF THE CONSENT PROPOSED BY MLI. SEBI HAS AGREED TO A SETTLEMENT AMOUNT OF INR40,34,185(USD68,170.94).



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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	DURING 2011 AND 2012, ISE IDENTIFIED 131 IRISH GOVERNMENT BOND TRADES THAT MERRILL LYNCH INTERNATIONAL ("MLI") FAILED TO REPORT TO ISE CONSTITUTING A BREACH OF ISE RULES 2.52(B) AND 4.7.2.
Initiated By:	IRISH STOCK EXCHANGE ("ISE")
Date Initiated:	03/26/2013
Docket/Case Number:	NONE
Principal Product Type:	Debt - Government
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:	08/30/2013
Sanctions Ordered:	Monetary/Fine \$13,196.25
Other Sanctions Ordered:	A FINE OF 10,000 EUROS (APPROXIMATELY US\$13,196.25) WAS IMPOSED ON MLI.
Sanction Details:	A FINE OF 10,000 EUROS (APPROXIMATELY US\$13,196.25) WAS IMPOSED ON MLI.
Firm Statement	A FINE OF 10,000 EUROS (APPROXIMATELY US\$13,196.25) WAS IMPOSED ON MLI. MLI IDENTIFIED AND SELF-REPORTED THESE ERRORS TO ISE AND TOOK IMMEDIATE STEPS TO ENSURE THAT THE RELEVANT BOOKS WERE CORRECTLY INCLUDED IN MLI'S DAILY REPORTING GOING FORWARD. MLI ALSO CHANGED ITS DATA GATHERING PROCESS TO PREVENT SUCH OMISSIONS OCCURRING AGAIN IN THE FUTURE AND IS IN THE PROCESS OF ESTABLISHING AN ADDITIONAL LAYER OF OVERSIGHT/GOVERNANCE TO THE ISE REPORTING PROCESS.

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Reporting Source:	Firm
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Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	FAILURE BY MERRILL LYNCH INTERNATIONAL ("MLI") TO REPORT 129 VALID IRISH GOVERNMENT BOND TRADES TO ISE BETWEEN AUGUST 12, 2013 AND SEPTEMBER 5, 2013 CONSTITUTING A BREACH OF ISE RULES 2.52(B) AND 4.7.2.
Initiated By:	IRISH STOCK EXCHANGE ("ISE")
Date Initiated:	09/16/2013
Docket/Case Number:	NONE
Principal Product Type:	Debt - Government
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:	01/15/2014
Sanctions Ordered:	Monetary/Fine \$20,405.65
Other Sanctions Ordered:	A FINE OF 15,000 EUROS (APPROXIMATELY US\$20,405.65) WAS IMPOSED ON MLI.
Sanction Details:	A FINE OF 15,000 EUROS (APPROXIMATELY US\$20,405.65) WAS IMPOSED ON MLI.
Firm Statement	A FINE OF 15,000 EUROS (APPROXIMATELY US\$20,405.65) WAS IMPOSED ON MLI. THE ISE HAS TAKEN INTO ACCOUNT THAT MLI HAS COOPERATED FULLY WITH THE ISE AT ALL STAGES OF THE INVESTIGATION, HAS TAKEN ACTION TO ADDRESS THE IDENTIFIED ERRORS AND HAS ALSO TAKEN THE NECESSARY ADDITIONAL ACTIONS TO ENSURE THE CORRECT AND ACCURATE REPORTING OF ITS TRADES IN IRISH GOVERNMENT BONDS TO THE ISE GOING FORWARD.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final



Allegations:	ON THREE INSTANCES BETWEEN MAY AND AUGUST 2011, MERRILL LYNCH INTERNATIONAL ("MLI") FILED TO ACCURATELY COMPLETE ITS CLOSE OUT PROCEDURE BY THE 10A.M. CUT-OFF TIME AS REQUIRED BY THE EXCHANGE, WHICH CONTRIBUTED TO THE EXCHANGE PUBLISHING OVERSTATED OPEN INTEREST FIGURES. AN INVESTIGATION WAS LAUNCHED REQUESTING THE MLI REPORT BACK TO THE EXCHANGE ON THE REASONS BEHIND THESE FAILURES AND THE STEPS TAKEN TO PREVENT A RECURRENCE. MLI NOTED THAT PROCEDURAL FAILURES WERE THE CAUSE OF THE INCIDENTS.
Initiated By:	ICE FUTURES EUROPE (THE "EXCHANGE")
Date Initiated:	09/28/2011
Docket/Case Number:	NONE
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:	Other
Resolution Date:	09/28/2011
Sanctions Ordered:	Monetary/Fine \$31,295.84
Other Sanctions Ordered:	A FINANCIAL PENALTY OF £20,000 (APPROXIMATELY US\$31,295.84) WAS IMPOSED ON MLI.
Sanction Details:	A FINANCIAL PENALTY OF £20,000 (APPROXIMATELY US\$31,295.84) WAS IMPOSED ON MLI.
Firm Statement	A FINANCIAL PENALTY OF £20,000 (APPROXIMATELY US\$31,295.84) WAS IMPOSED ON MLI.

Disclosure 103 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final
Allegations:	FROM SEPTEMBER 1996 TO DECEMBER 2001, MERRILL LYNCH BREACHED SFA RULE 5.49 BY FAILING TO ACCURATELY REPORT THE CAPACITY IN



WHICH IT EXECUTED TRANSACTIONS IN NON-UK EUROPEAN EQUITIES WHEN REPORTING TRANSACTIONS TO THE SFA. FROM DECEMBER 2001 UNTIL JANUARY 2006, MERRILL LYNCH BREACHED FSA RULE SUP 17.6.2R BY FAILING TO ACCURATELY REPORT THE CAPACITY IN WHICH IT EXECUTED TRANSACTIONS IN NON-UK EUROPEAN EQUITIES WHEN REPORTING TRANSACTIONS TO THE FSA.

Initiated By: FINANCIAL SERVICES AUTHORITY

Date Initiated: 08/04/2006

Docket/Case Number: NO DOCKET NUMBER

Principal Product Type: Other

Other Product Type(s): NON-UK EUROPEAN EQUITIES

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

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 08/04/2006

Sanctions Ordered: Monetary/Fine \$150,000.00

Other Sanctions Ordered: MONETARY FINE WAS 150,000.00 IN BRITISH POUNDS. UNABLE TO ENTER IN PREFORMATTED US DOLLAR SPACE ABOVE.

Sanction Details: N/A

Firm Statement SEVERAL MITIGATING FACTORS WERE CONSIDERED BY THE FINANCIAL SERVICES AUTHORITY ("FSA") WHEN IMPOSING THEIR FINE: MERRILL LYNCH REPORTED THIS MATTER TO THE FSA AND HAS COOPERATED FULLY WITH THE FSA IN RESPECT TO THIS MATTER. MERRILL LYNCH HAS TAKEN SUBSTANTIAL STEPS TO IMPROVE ITS SYSTEMS AND CONTROLS TO ENSURE THAT GOING FORWARD TRANSACTION REPORTS ARE ACCURATE. THE FSA HAS STATED THAT MERRILL LYNCH'S FAILURE WAS NOT DELIBERATE OR RECKLESS. FINE TO BE PAID BY MERRILL LYNCH ON OR BEFORE AUGUST 17, 2006.

Disclosure 104 of 170

Reporting Source: Firm

Affiliate: MERRILL LYNCH INTERNATIONAL

Current Status: Final



Allegations:	THE FINANCIAL CONDUCT AUTHORITY ("FCA") TOOK ACTION BECAUSE MERRILL LYNCH INTERNATIONAL ("MLI") CONTRAVENED SUP 17.1.4R AND SUP 17.4.1 EU BY FAILING TO REPORT OR TO ACCURATELY REPORT CERTAIN TRANSACTIONS BETWEEN NOVEMBER 2007 AND NOVEMBER 2014.
Initiated By:	FINANCIAL CONDUCT AUTHORITY (FCA)
Date Initiated:	04/15/2015
Docket/Case Number:	FCA REF. NO. WS00235
Principal Product Type:	Other
Other Product Type(s):	UNSPECIFIED SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	04/22/2015
Sanctions Ordered:	Monetary/Fine \$19,989,553.67
Other Sanctions Ordered:	N/A
Sanction Details:	MLI AGREED TO SETTLE THIS MATTER WITH THE FCA IN THE EARLY STAGES AND THE FCA IMPOSED A FINANCIAL PENALTY OF GBP13,285,900 (USD 19,989,553.67).
Firm Statement	MLI AGREED ON APRIL 15, 2015 TO SETTLE THE MATTER FOR PAYMENT OF GBP13,285,900 (USD 19,989,553.67). THE FINAL NOTICE WAS PUBLISHED ON THE FCA'S WEBSITE ON APRIL 22, 2015. THE SETTLEMENT PAYMENT WAS MADE ON APRIL 23, 2015. IN DETERMINING THE FINE IMPOSED, THE FCA TOOK INTO ACCOUNT THE RESOURCE DEVOTED BY MLI TO ENSURING ACCURATE TRANSACTION REPORTING AND REMEDIATING THE CAUSES OF THE FAILINGS, INCLUDING ENGAGING A PROFESSIONAL SERVICES FIRM TO REVIEW INTERNAL SYSTEMS AND PROCESSES.

Disclosure 105 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL
Current Status:	Final



Allegations:	CONSOB INVESTIGATED EVENTS OCCURRING BETWEEN APRIL 20, 2005 AND SEPTEMBER 20, 2005 REGARDING AN EQUITY SWAP AGREEMENT WHICH RESULTED IN MERRILL LYNCH INTERNATIONAL BECOMING THE LEGAL OWNER OF MORE THAN 5 PERCENT HOLDING IN AN ITALIAN COMPANY WHICH WAS DEEMED UNDER ITALIAN LAW TO BE A SIGNIFICANT HOLDING FOR THE PURPOSES OF FULFILLING NOTIFICATION OBLIGATIONS PURSUANT TO THE FOLLOWING ITALIAN LEGISLATION: ARTICLES 120 OF LEGISLATIVE DECREE NO 58/98 AND 119 OF REGULATION NO. 11971/99 AND WAS ACCORDINGLY TO BE NOTIFIED IN ACCORDANCE WITH THE MANNER AND TERMS PROVIDED UNDER ARTICLE 121 OF SAID REGULATION.
Initiated By:	ITALIAN COMMISSIONE NAXIONALE PER LE SOCIETA E LA BORSA ("CONSOB")
Date Initiated:	01/10/2008
Docket/Case Number:	NONE
Principal Product Type:	
Other Product Type(s):	EQUITY SWAP AGREEMENT
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	01/10/2008
Sanctions Ordered:	Monetary/Fine \$369,950.00
Other Sanctions Ordered:	MERRILL LYNCH INTERNATIONAL WAS ORDERED TO PAY AN ADMINISTRATIVE FINE IN THE AMOUNT OF 250,000.00 EUROS (APPROXIMATELY USD\$369,950.00).
Sanction Details:	MERRILL LYNCH INTERNATIONAL WAS ORDERED TO PAY AN ADMINISTRATIVE FINE IN THE AMOUNT OF 250,000.00 EUROS (APPROXIMATELY USD\$369,950.00).
Firm Statement	MERRILL LYNCH INTERNATIONAL WAS ORDERED TO PAY AN ADMINISTRATIVE FINE IN THE AMOUNT OF 250,000.00 EUROS (APPROXIMATELY USD\$369,950.00).

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Reporting Source: Firm



Affiliate:	MERRILL LYNCH INTERNATIONAL (NKA BOFAML INVESTMENTS)
Current Status:	Final
Allegations:	CONTRARY TO LSE RULE 4.64(E) MLI MISTAKENLY SUBMITTED AN ORDER TO THE ORDER BOOK WITH AN ERRONEOUS PRICE IN BREACH OF ITS OBLIGATION TO HAVE ALL TIME SUFFICIENT ORDER MANAGEMENT SYSTEMS, PROCEDURES AND CONTROLS TO PREVENT THE ENTRY OF SUCH ERRONEOUS ORDERS.
Initiated By:	LONDON STOCK EXCHANGE PLC ("LSE")
Date Initiated:	10/19/2000
Docket/Case Number:	N/A
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	FINE
Resolution:	Decision
Resolution Date:	10/19/2000
Sanctions Ordered:	Monetary/Fine \$14,240.00
Other Sanctions Ordered:	
Sanction Details:	FINE WAS 10,000 POUNDS (UK)(APPROXIMATELY \$14,240 US)
Firm Statement	CONTRARY TO LSE RULE 4.64(E) MLI MISTAKENLY SUBMITTED AN ORDER TO THE ORDER BOOK WITH AN ERRONEOUS PRICE IN BREACH OF ITS OBLIGATION TO HAVE ALL TIME SUFFICIENT ORDER MANAGEMENT SYSTEMS, PROCEDURES AND CONTROLS TO PREVENT THE ENTRY OF SUCH ERRONEOUS ORDERS.

Disclosure 107 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL (NKA BOFAML INVESTMENTS)
Current Status:	Final
Allegations:	MERRILL LYNCH INTERNATIONAL BREACHED LONDON STOCK EXCHANGE RULE 2.11 (CONDITIONAL TRADES).



Initiated By: LONDON STOCK EXCHANGE
Date Initiated: 04/30/1997
Docket/Case Number: UNKNOWN
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: Decision
Resolution Date: 04/30/1997
Sanctions Ordered: Monetary/Fine \$10,000.00
Other Sanctions Ordered:
Sanction Details: MERRILL LYNCH INTERNATIONAL FINED \$10,000(UK)

Disclosure 108 of 170

Reporting Source: Firm
Affiliate: MERRILL LYNCH EQUITIES (AUSTRALIA) LIMITED
Current Status: Final
Allegations: MERRILL LYNCH EQUITIES (AUSTRALIA) LIMITED ("MLE(A)L") CONTRAVENED ASIC MARKET INTEGRITY RULES 5.6.1 AND 5.9.1 AND THEREBY CONTRAVENED SUBSECTION 798H(1) OF THE ACT IN THAT THE MLE(A)L FAILED TO HAVE IN PLACE AN APPROPRIATE AUTOMATED PRICE FILTER FOR ONE CLIENT ACCOUNT, WHICH INTERFERED WITH EFFICIENCY AND INTEGRITY OF THE MARKET; AND MLE(A)L'S MISCONDUCT RESULTED IN A MARKET NOT BEING BOTH FAIR AND ORDERLY.
Initiated By: AUSTRALIAN SECURITIES & INVESTMENTS COMMISSION ("ASIC")
Date Initiated: 08/07/2014
Docket/Case Number: MDP REF NO. 20034/13; ASIC REF NO. 23929/12
Principal Product Type: Equity Listed (Common & Preferred Stock)
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:	08/07/2014
Sanctions Ordered:	Monetary/Fine \$89,108.95
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING TO QUILT OR LIABILITY IN RELATION TO THE ALLEGED CONTRAVENTION, MLE(A)L AGREED TO PAY A PENALTY OF AUD\$96,000.00 (APPROXIMATELY USD\$89,108.95). MLE(A)L COOPERATED WITH ASIC THROUGHOUT ITS INVESTIGATION.
Firm Statement	WITHOUT ADMITTING TO QUILT OR LIABILITY IN RELATION TO THE ALLEGED CONTRAVENTION, MLE(A)L AGREED TO PAY A PENALTY OF AUD\$96,000.00 (APPROXIMATELY USD\$89,108.95). MLE(A)L COOPERATED WITH ASIC THROUGHOUT ITS INVESTIGATION.

Disclosure 109 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH EQUITIES (AUSTRALIA) LIMITED
Current Status:	Final
Allegations:	MERRILL LYNCH EQUITIES (AUSTRALIA) LIMITED IS ALLEGED TO HAVE CONTRAVENED SECTION 798HH(1) OF THE CORPORATIONS ACT 2001 BY REASON OF CONTRAVENING RULE 5.9.1 OF THE ASIC MARKET INTEGRITY RULES 2010 BY FAILING TO PREVENT THE ENTRY IN THE ASX TRADING PLATFORM OF AN ERRONEOUS ORDER (A MISTAKE IN ENTERING THE PRICE FOR AN ORDER) WHICH RESULTING IN A MARKET FOR RIO TINTO LIMITED ORDINARY SHARES NOT BEING BOTH FAIR AND ORDERLY.
Initiated By:	AUSTRALIAN SECURITIES & INVESTMENTS COMMISSION ("ASIC")
Date Initiated:	06/10/2014
Docket/Case Number:	MDP07/14
Principal Product Type:	Equity Listed (Common & Preferred Stock)
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:	06/10/2014
Sanctions Ordered:	Monetary/Fine \$60,885.02
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING TO QUILT OR LIABILITY IN RELATION TO THE ALLEGED CONTRAVENTION, MERRILL LYNCH EQUITIES (AUSTRALIA) LIMITED AGREED TO PAY PENALTY OF AUD\$65,000.00 (APPROXIMATELY USD\$60,885.02). MERRILL LYNCH EQUITIES (AUSTRALIA) LIMITED COOPERATED WITH ASIC THROUGHOUT ITS INVESTIGATION AND TOOK REMEDIAL MEASURES TO PREVENT RECURRENCE OF THE BREACH.
Firm Statement	ALLEGED CONTRAVENTION, MERRILL LYNCH EQUITIES (AUSTRALIA) LIMITED AGREED TO PAY PENALTY OF AUD\$65,000.00 (APPROXIMATELY USD\$60,885.02). MERRILL LYNCH EQUITIES (AUSTRALIA) LIMITED COOPERATED WITH ASIC THROUGHOUT ITS INVESTIGATION AND TOOK REMEDIAL MEASURES TO PREVENT RECURRENCE OF THE BREACH.

Disclosure 110 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH COMMODITIES, INC.
Current Status:	Final
Allegations:	THE NYMEX (THE "EXCHANGE") ALLEGED THAT MERRILL LYNCH COMMODITIES, INC. ("MLCI") VIOLATED NYMEX RULE 432.2 WHEN, ON TRADE DATE APRIL 29, 2013, A TRADER EMPLOYED BY MLCI FAILED TO MONITOR THE OPERATION OF A CRUDE OIL AUTO-SPREADER UTILIZED BY MLCI, MINIMIZING THE AUTO-SPREADER APPLICATION AND FAILING TO MONITOR THE ORDER MODIFICATION ACTIVITY. THIS RESULTED IN THE AUTO SPREADER STREAMING PRICE MODIFICATIONS AND DISCLOSING PRICES TO THE MARKET THAT WERE NOT VIABLE, REQUIRING THE EXCHANGE TO INITIATE A PORT CLOSURE ON APRIL 29, 2013. MLCI FAILED TO DILIGENTLY SUPERVISE ITS TRADER IN A MANNER SUFFICIENT TO ENSURE THAT THE AUTO-SPREADER WAS ADEQUATELY MONITORED AND MAINTAINED.
Initiated By:	NYMEX BUSINESS CONDUCT COMMITTEE ("BCC COMMITTEE")



Date Initiated:	09/17/2014
Docket/Case Number:	NYMEX 13-9546-BC
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:	09/19/2014
Sanctions Ordered:	Monetary/Fine \$60,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	PURSUANT TO AN OFFER OF SETTLEMENT, MLCI PRESENTED AT A HEARING ON SEPTEMBER 17, 2014, IN WHICH MLCI NEITHER ADMITTED OR DENIED THE RULE VIOLATION, AND THE BCC COMMITTEE ORDER MLCI TO PAY A FINE OF \$60,000.
Firm Statement	PURSUANT TO AN OFFER OF SETTLEMENT, MLCI PRESENTED AT A HEARING ON SEPTEMBER 17, 2014, IN WHICH MLCI NEITHER ADMITTED OR DENIED THE RULE VIOLATION, AND THE BCC COMMITTEE ORDER MLCI TO PAY A FINE OF \$60,000.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH COMMODITIES, INC.
Current Status:	Final
Allegations:	THE NYMEX (THE EXCHANGE") FOUND THAT ON TRADE DATE DECEMBER 10, 2013, MERRILL LYNCH COMMODITIES, INC. ("MLCI") ENTERED INTO AN EFRP TRANSACTION THAT DID NOT CONTAIN ADEQUATE DOCUMENTATION OF THE RELATED SWAP TRANSACTION, AND THEREFORE WAS NOT A BONA FILED EFRP. AS A RESULT, MLCI VIOLATED EXCHANGE LEGACY RULE 538.H.
Initiated By:	NYMEX BUSINESS CONDUCT COMMITTEE ("BCC COMMITTEE")
Date Initiated:	04/15/2015
Docket/Case Number:	NYMEX 14-9800-BC



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:	04/17/2015
Sanctions Ordered:	Monetary/Fine \$7,500.00
Other Sanctions Ordered:	
Sanction Details:	PURSUANT TO AN OFFER OF SETTLEMENT, MLCI PRESENTED AT A HEARING ON APRIL 15, 2015, IN WHICH MLCI NEITHER ADMITTED OR DENIED THE RULE VIOLATION, AND THE BCC COMMITTEE ORDERED MLCI TO PAY A FINE OF \$7,500. THE DECISION BECAME FINAL ON APRIL 15, 2015 AND BECAME EFFECTIVE ON APRIL 17, 2015.
Firm Statement	PURSUANT TO AN OFFER OF SETTLEMENT, MLCI PRESENTED AT A HEARING ON APRIL 15, 2015, IN WHICH MLCI NEITHER ADMITTED OR DENIED THE RULE VIOLATION, AND THE BCC COMMITTEE ORDERED MLCI TO PAY A FINE OF \$7,500. THE DECISION BECAME FINAL ON APRIL 15, 2015 AND BECAME EFFECTIVE ON APRIL 17, 2015.

Disclosure 112 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH COMMODITIES, INC.
Current Status:	Final
Allegations:	A SUBCOMMITTEE OF THE ICE FUTURES U.S.'S BUSINESS CONDUCT COMMITTEE DETERMINED THAT MERRILL LYNCH COMMODITIES, INC. ("MLCI") MAY HAVE VIOLATED EXCHANGE RULE 6.20(B) IN FOUR (4) INSTANCES BY EXCEEDING THE SPOT MONTH SPECULATIVE POSITION LIMIT IN THE ICE HENRY LD1 FIXED PRICE FUTURE CONTRACT ON JUNE 24 AND 26, 2013, AND JANUARY 29, 2014, AND BY EXCEEDING THE SPOT MONTH SPECULATIVE POSITION LIMIT IN THE ICE TRANSCO ZONE 6 (NON NY) SWING FUTURE ON MARCH 28, 2014; AND EXCHANGE RULE 4.01 IN ONE (1) INSTANCE BY FAILING TO SUPERVISE THE ACTIVITIES OF THE FIRM'S EMPLOYEES IN ALLOWING THE REPEAT VIOLATIONS OF RULE 6.20(B).



Initiated By:	ICE FUTURES U.S., INC. BUSINESS CONDUCT COMMITTEE
Date Initiated:	09/26/2014
Docket/Case Number:	2013-00194
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 DISGORGEMENT
Resolution:	Settled
Resolution Date:	09/26/2014
Sanctions Ordered:	Monetary/Fine \$80,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	DISGORGEMENT OF \$9,972.50
Sanction Details:	IN ACCORDANCE WITH THE TERMS OF SETTLEMENT, IN WHICH MLCI NEITHER ADMITTED NOR DENIED THE RULE VIOLATIONS, MLCI PAID A MONETARY PENALTY OF \$89,972.50, WHICH INCLUDES DISGORGEMENT OF PROFITS IN THE AMOUNT OF \$9,972.50, AND AGREED TO CEASE AND DESIST FROM FUTURE VIOLATIONS OF RULES 6.20(B) AND 4.01.
Firm Statement	IN ACCORDANCE WITH THE TERMS OF SETTLEMENT, IN WHICH MLCI NEITHER ADMITTED NOR DENIED THE RULE VIOLATIONS, MLCI PAID A MONETARY PENALTY OF \$89,972.50, WHICH INCLUDES DISGORGEMENT OF PROFITS IN THE AMOUNT OF \$9,972.50, AND AGREED TO CEASE AND DESIST FROM FUTURE VIOLATIONS OF RULES 6.20(B) AND 4.01.

Disclosure 113 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH COMMODITIES, INC.
Current Status:	Final
Allegations:	THE CFTC ALLEGED THAT MERRILL LYNCH COMMODITIES, INC. ("MLCI") VIOLATED SECTION 4A(B)2 OF THE COMMODITY EXCHANGE ACT, AS AMENDED, AND CFTC REGULATION 150.2, 17 C.F.R. § 150.02 (2011) WHEN MLCI HELD NET SHORT FUTURES EQUIVALENT POSITIONS IN COTTON NO. 2 FUTURES CONTRACTS IN EXCESS OF SPECULATIVE POSITION LIMITS SET BY THE CFTC AS A RESULT OF ITS TRADING ON THE



INTERCONTINENTALEXCHANGE U.S. OVER FOUR CONSECUTIVE DAYS
FROM JANUARY 31, 2011 THROUGH FEBRUARY 3, 2011.

Initiated By:	COMMODITY FUTURES TRADING COMMISSION ("CFTC")
Date Initiated:	03/29/2011
Docket/Case Number:	12-05
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:	Order
Resolution Date:	12/07/2011
Sanctions Ordered:	Monetary/Fine \$350,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	WITHOUT ADMITTING OR DENYING ANY OF THE FINDINGS OR CONCLUSIONS IN THE ORDER, MLCI CONSENTED TO THE ENTRY OF THE ORDER, SHALL EASE AND DESIST FROM VIOLATING SECTION 4A(B)(2) OF THE COMMODITY EXCHANGE ACT, AS AMENDED, AND CFTC REGULATION 150.2, 17 C.F.R. § 150.02 (2011), AND PAID A CIVIL MONETARY PAYMENT OF \$350,000.00.
Firm Statement	WITHOUT ADMITTING OR DENYING ANY OF THE FINDINGS OR CONCLUSIONS IN THE ORDER, MLCI CONSENTED TO THE ENTRY OF THE ORDER, SHALL EASE AND DESIST FROM VIOLATING SECTION 4A(B)(2) OF THE COMMODITY EXCHANGE ACT, AS AMENDED, AND CFTC REGULATION 150.2, 17 C.F.R. § 150.02 (2011), AND PAID A CIVIL MONETARY PAYMENT OF \$350,000.00.

Disclosure 114 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH COMMODITIES (EUROPE) LIMITED
Current Status:	Final
Allegations:	A PANEL OF THE NYMEX BUSINESS CONDUCT COMMITTEE (THE "PANEL") FOUND THAT MERRILL LYNCH COMMODITIES (EUROPE) LIMITED ("MLCE") IS SUBJECT TO THE JURISDICTION OF THE EXCHANGE BECAUSE IT IS AN



AFFILIATE OF A NYMEX MEMBER AND THAT ON CERTAIN DATES IN APRIL 2012, A TRADER EMPLOYED BY MLCE ENTERED INTO A SERIES OF BUY AND SELL ORDERS IN VARIOUS CRUDE OPTIONS AND FUTURES CONTRACTS BETWEEN ACCOUNTS WITH THE SAME BENEFICIAL OWNER. THE PANEL ALSO FOUND THAT MLCE FAILED TO DILIGENTLY SUPERVISED ITS TRADER IN THE CONDUCT OF HIS BUSINESS WITH THE EXCHANGE. THE PANEL FOUND THAT AS A RESULT OF THE FOREGOING, MLCE VIOLATED EXCHANGE RULES 432.W AND 534.

Initiated By:	NEW YORK MERCANTILE EXCHANGE ("NYMEX")
Date Initiated:	02/05/2014
Docket/Case Number:	NYMEX 13-9457-BC
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:	02/07/2014
Sanctions Ordered:	Monetary/Fine \$15,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	PURSUANT TO AN OFFER OF SETTLEMENT THAT MLCE PRESENTED AT A HEARING ON 2/5/2014, IN WHICH MLCE NEITHER ADMITTING OR DENIED THE RULE VIOLATIONS UPON WHICH THE PENALTY IS BASED, THE PANEL ORDERED MLCE TO PAY A FINE TO THE EXCHANGE IN THE AMOUNT OF \$15,000.00.
Firm Statement	PURSUANT TO AN OFFER OF SETTLEMENT THAT MLCE PRESENTED AT A HEARING ON 2/5/2014, IN WHICH MLCE NEITHER ADMITTING OR DENIED THE RULE VIOLATIONS UPON WHICH THE PENALTY IS BASED, THE PANEL ORDERED MLCE TO PAY A FINE TO THE EXCHANGE IN THE AMOUNT OF \$15,000.00.

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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH COMMODITIES (EUROPE) LIMITED



Current Status:	Final
Allegations:	ON JUNE 15, 2013, THE EXCHANGE ALLEGED THAT MERRILL LYNCH COMMODITIES (EUROPE) LIMITED ("MLCE") ON TWO OCCASIONS OFFERED SELL ORDERS ON THE EXCHANGE WHICH LOWERED THE BEST ASKING PRICE OF AN EXCHANGE PRODUCT. WHILE OFFERING THE SELL ORDERS MLCE ALLEGEDLY BOUGHT LARGER QUANTITIES IN THE OVER-THE-COUNTER MARKET AND PAID THE SAME PRICE AS THE PRICE OF ITS SELL ORDERS. THE EXCHANGE FOUND THAT THE SELL ORDERS MOST LIKELY WERE OFFERED WITH INTENT TO IMPROPERLY INFLUENCE THE TRADING OF OTHER MARKET PARTICIPANTS. THE EXCHANGE THEREFORE DETERMINED THAT MLCE VIOLATED THE PROHIBITION AGAINST MARKET MANIPULATION SET OUT IN THE MARKET CONDUCT RULES, SECTION 5.1. THE EXCHANGE FURTHER DEEMED IT TO BE MITIGATING THAT THE POTENTIAL BENEFIT FROM THE MANIPULATIVE ACTIVITY WAS LIMITED.
Initiated By:	NASDAQ OMX COMMODITIES OSIO ASA (THE "EXCHANGE")
Date Initiated:	05/23/2013
Docket/Case Number:	NONE
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:	Other
Resolution Date:	07/04/2013
Sanctions Ordered:	Monetary/Fine \$57,329.02
Other Sanctions Ordered:	A FINANCIAL PENALTY OF NOK 350.000 (APPROXIMATELY US\$57,329.02) WAS IMPOSED ON MLCE.
Sanction Details:	A FINANCIAL PENALTY OF NOK 350.000 (APPROXIMATELY US\$57,329.02) WAS IMPOSED ON MLCE.
Firm Statement	A FINANCIAL PENALTY OF NOK 350.000 (APPROXIMATELY US\$57,329.02) WAS IMPOSED ON MLCE.

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Reporting Source: Firm



Affiliate:	MERRILL LYNCH COMMODITIES (EUROPE) LIMITED
Current Status:	Final
Allegations:	A PANEL OF THE COMEX BUSINESS CONDUCT COMMITTEE (THE "PANEL") FOUND THAT MERRILL LYNCH COMMODITIES (EUROPE) LIMITED ("MLCE") IS SUBJECT TO THE JURISDICTION OF THE EXCHANGE BECAUSE IT IS AN AFFILIATE OF A COMEX MEMBER AND THAT ON CERTAIN DATES IN APRIL 2012, A TRADER EMPLOYED BY MLCE ENTERED INTO A SERIES OF BUY AND SELL ORDERS IN VARIOUS GOLD OPTIONS AND COPPER FUTURES CONTRACTS BETWEEN ACCOUNTS WITH THE SAME BENEFICIAL OWNER. THE PANEL ALSO FOUND THAT MLCE FAILED TO DILIGENTLY SUPERVISE ITS TRADER IN THE CONDUCT OF HIS BUSINESS WITH THE EXCHANGE. THE PANEL FOUND THAT AS A RESULT OF THE FOREGOING, MLCE VIOLATED EXCHANGE RULES 432.W AND 534.
Initiated By:	COMMODITY EXCHANGE ("COMEX")
Date Initiated:	02/05/2014
Docket/Case Number:	COMEX 12-9058-BC
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:	02/07/2014
Sanctions Ordered:	Monetary/Fine \$15,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	PURSUANT TO AN OFFER TO SETTLEMENT THAT MLCE PRESENTED AT A HEARING ON 2/5/2014, IN WHICH MLCE NEITHER ADMITTED OR DENIED THE RULE VIOLATIONS UPON WHICH THE PENALTY IS BASED, THE PANEL ORDERED MLCE TO PAY A FINE TO THE EXCHANGE IN THE AMOUNT OF \$15,000.00.
Firm Statement	PURSUANT TO AN OFFER TO SETTLEMENT THAT MLCE PRESENTED AT A HEARING ON 2/5/2014, IN WHICH MLCE NEITHER ADMITTED OR DENIED THE RULE VIOLATIONS UPON WHICH THE PENALTY IS BASED, THE PANEL ORDERED MLCE TO PAY A FINE TO THE EXCHANGE IN THE AMOUNT OF \$15,000.00.



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Reporting Source:	Firm
Affiliate:	MERRILL LYNCH (ASIA PACIFIC) LIMITED ("MLAP")
Current Status:	Final
Allegations:	SFC CONDUCTED AN INVESTIGATION OF FORMER MLAP STAFF MEMBERS RELATING TO UNAUTHORIZED AND IMPROPER TRADING OF ML WARRANTS THROUGH NOMINEE ACCOUNTS MAINTAINED BY THEM AT THIRD PARTY UNRELATED BROKERS IN HONG KONG.
Initiated By:	SECURITIES & FUTURES COMMISSION OF HONG KONG ("SFC")
Date Initiated:	03/31/2000
Docket/Case Number:	N/A
Principal Product Type:	Other
Other Product Type(s):	DERIVATIVE WARRANTS LISTED ON THE STOCK EXCHANGE OF HONG KONG, LTD. ("SHK") AND ISSUED BY MERRILL LYNCH INTERNATIONAL & CO. C.V. ("MLICO") ("ML WARRANTS")
Principal Sanction(s)/Relief Sought:	Reprimand
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	03/31/2000
Firm Statement	SFC ISSUED A PRESS RELEASE ANNOUNCING A SEVERE REPRIMAND OF MLAP AND MERRILL LYNCH FAR EAST LIMITED FOR THEIR FAILURE TO ADEQUATELY SUPERVISE THE TRADING BY FORMER MLAP EMPLOYEES OF ML WARRANTS.

Disclosure 118 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH YATIRIM BANK A.S.
Current Status:	Final
Allegations:	INCONSISTENCY IN THE ACCOUNTING OF MERRILL LYNCH YATIRIM BANK A.S.'S FX SWAP (FX ROLL) TRANSACTIONS ACCORDING TO THE BRSA'S



BANKING LAW NO: 5411 ARTICLE 39 AND REGULATION ON LOCAL CHART OF ACCOUNTS ARTICLE 9. BRSA INFORMED MERRILL LYNCH YAIRIM BANK A.S. (MLYB) THAT THERE WAS AN INCONSISTENCY BETWEEN THE LOCAL CHART OF ACCOUNTS (COA) DESCRIPTIONS VERSUS MLYB'S FX SWAPS (FX ROLL) TRANSACTION BOOKINGS FOR THE SHORT LEG OF THESE TRADES WHICH DID NOT HAVE SAME DAY MATURITY WITH THE TRADE DATE. THE CONCERN WAS RELATED WITH THE ACCOUNT UNDER WHICH THE SHORT LEG OF THE FX SWAP (FX ROLL) TRANSACTIONS WHICH HAD MATURITIES LONGER THAN TRADE DATE (T) WERE BEING BOOKED. THOUGH MLYB HAD BEEN BOOKING THESE TRADES UNDER "DERIVATIVES" MAIN ACCOUNT, BRSA STATED THAT ONLY THE LONG LEG NEEDS TO BE BOOKED UNDER "DERIVATIVES" MAIN ACCOUNT AND THE SHORT LEG NEEDS TO BE BOOKED UNDER "OTHER LIABILITIES" ACCOUNT WITHIN THE OFF BALANCE SHEET.

Initiated By:	BANKING REGULATION AND SUPERVISION AGENCY (BRSA)
Date Initiated:	05/20/2014
Docket/Case Number:	NONE
Principal Product Type:	Other
Other Product Type(s):	FX SWAP (FX ROLL)
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	05/20/2014
Sanctions Ordered:	Monetary/Fine \$8,450.00
Other Sanctions Ordered:	N/A
Sanction Details:	MERRILL LYNCH YATIRIM BANK, A.S. WAS FINED TRY18,589 (APPROXIMATELY USD\$8,450) BY BRSA.
Firm Statement	MERRILL LYNCH YATIRIM BANK, A.S. WAS FINED TRY18,589 (APPROXIMATELY USD\$8,450) BY BRSA.

Disclosure 119 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH PRIVATE (AUSTRALIA) PTY LIMITED



Current Status:	Final
Allegations:	MERRILL LYNCH AUSTRALIA WAS FINED FOR BREACHING VARIOUS ASX BUSINESS RULES RELATING TO THE BOOKING AND SUPERVISION OF CERTAIN CLIENT TRANSACTIONS IN A STOCK LISTED ON THE ASX.
Initiated By:	AUSTRALIAN STOCK EXCHANGE LIMITED A.C.N. ("ASX")
Date Initiated:	08/22/2000
Docket/Case Number:	INSPECTION REPORT # 1999116
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	FINE
Resolution:	Decision
Resolution Date:	08/22/2000
Sanctions Ordered:	Monetary/Fine \$18,000.00
Other Sanctions Ordered:	
Sanction Details:	FINE WAS \$18,000 (AUSTRALIA) APPROXIMATELY \$9,400 (US)

Disclosure 120 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH MEXICO, S.A. DE C.V., CASA DE BOLSA
Current Status:	Final
Allegations:	THE CNBV ALLEGED THAT DURING THE FOURTH QUARTER OF 2008, MERRILL LYNCH MEXICO, S.A. DE C.V., CASA DE BOLSA PARTICIPATED IN TRADING ACTIVITY INVOLVING MEXICAN GOVERNMENT BONDS THAT RAN CONTRARY TO PROVISIONS UNDER ARTICLE 370 OF THE MEXICAN SECURITIES LAW.
Initiated By:	COMISION NACIONAL BANCARIA Y DE VALORES (CNBV)
Date Initiated:	11/01/2013
Docket/Case Number:	EXP.: 211.115.11 (1185) "2011"/196/4
Principal Product Type:	Debt - Government

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

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:**Resolution:**

Decision

Resolution Date:

11/01/2013

Sanctions Ordered:

Monetary/Fine \$1,772,000.00

Other Sanctions Ordered:

N/A

Sanction Details:

THE CNBV FINED MERRILL LYNCH MEXICO, S.A. DE C.V., CASA DE BOLSA, 23,428,845.00 PESOS (APPROXIMATELY USD(1,772,000) FOR THE VIOLATION.

Firm Statement

THE CNBV FINED MERRILL LYNCH MEXICO, S.A. DE C.V., CASA DE BOLSA 23,428,845.00 PESOS (APPROXIMATELY USD\$ 1,772,000) FOR PARTICIPATING IN TRADING ACTIVITY INVOLVING MEXICAN GOVERNMENT BONDS, IN THE FOURTH QUARTER OF 2008, THAT RAN CONTRARY TO PROVISIONS UNDER ARTICLE 370 OF THE MEXICAN SECURITIES LAW. BANK OF AMERICA MEXICO S.A., INSTITUCION DE BANCA MULTIPLE AND MERRILL LYNCH MEXICO, S.A. DE C.V., CASA DE BOLSA PAID SAID FINES ON NOVEMBER 1, 2013.

Disclosure 121 of 170**Reporting Source:**

Firm

Affiliate:

MERRILL LYNCH MEXICO, S.A. DE C.V., CASA DE BOLSA

Current Status:

Final

Allegations:

BANCO DE MEXICO ALLEGED THAT DURING THE PERIOD FROM MARCH 14-29, 2011, MERRILL LYNCH MEXICO S.A. DE C.V., CASA DE BOLSA ("MERRILL LYNCH MEXICO") (1) VIOLATED NUMERAL 5, THIRD PARAGRAPH, OF CIRCULAR 4/2006 WHEN THREE OPTION TRANSACTIONS IN EFFECT AS OF AUGUST 14, 2009 WERE NOT CONFIRMED THROUGH ANY MEANS WITH WRITTEN PROOF OF THE EXECUTION OF THE CORRESPONDING TRANSACTIONS ON THE SAME DAY THEY WERE EXECUTED AND (2)VIOLATED NUMERAL 10.5 OF CIRCULAR 4/2006 WHEN MERRILL LYNCH MEXICO EXECUTED CREDIT DERIVATIVE TRANSACTIONS.

Initiated By:

BANCO DE MEXICO

Date Initiated:

04/29/2011



Docket/Case Number:	RESOLUTION: S34-133-2011
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	10/06/2011
Sanctions Ordered:	Monetary/Fine \$5,937.26
Other Sanctions Ordered:	N/A
Sanction Details:	BANCO DE MEXICO FINED MERRILL LYNCH MEXICO 22,858.00 PESOS (APPROXIMATELY USD\$1,690.11) 57,441.00 PESOS (APPROXIMATELY USD\$4,247.15) FOR THE RESPECTIVE VIOLATIONS FOR A TOTAL FINE OF 80,299 PESOS (APPROXIMATELY USD\$5,937.26).
Firm Statement	BANCO DE MEXICO FINED MERRILL LYNCH MEXICO (1)22,858.00 PESOS (APPROX. USD\$1,690.11) FOR THE VIOLATION OF NUMERAL 5, THIRD PARAGRAPH. OF CIRCULAR 4/2006 WHEN THREE OPTION TRANSACTIONS IN EFFECT AS OF AUGUST 14, 2009 WERE NOT CONFIRMED THROUGH ANY MEANS WITH WRITTEN PROOF OF THE EXECUTION OF THE CORRESPONDING TRANSACTIONS ON THE SAME DAY THEY WERE EXECUTED AND (2)55,441.0 PESOS (APPROXIMATELY USD\$4,247.15) FOR THE VIOLATION OF NUMERAL 10.5 OF CIRCULAR 4/2006 WHEN MERRILL LYNCH MEXICO EXECUTED CREDIT DERIVATIVE TRANSACTIONS, MERRILL LYNCH MEXICO PAID SAID FINES ON OCTOBER 25, 2011.

Disclosure 122 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH MEXICO, S.A. DE C.V., CASA DE BOLSA ("ML MEXICO)
Current Status:	Final
Allegations:	FOLLOWING AN EXAMINATION BY CNBV OF ML MEXICO OPERATIONS, THE CNBV IDENTIFIED CERTAIN VIOLATION RELATING TO ML MEXICO'S STOCK LENDING BUSINESS.
Initiated By:	COMICION NACIONAL BANCARIA Y DE VALORES
Date Initiated:	08/30/2000



Docket/Case Number: UNKNOWN

Principal Product Type: Options

Other Product Type(s): SECURITIES LENDING OPERATIONS

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: FINE

Resolution: Decision

Resolution Date: 08/30/2000

Sanctions Ordered: Monetary/Fine \$19,862.81

Other Sanctions Ordered:

Sanction Details: FINE WAS 185,320 MEXICAN PESOS, APPROXIMATELY 19,862.81 U.S. DOLLARS

Disclosure 123 of 170

Reporting Source: Firm

Affiliate: MERRILL LYNCH LIFE AGENCY INC.

Current Status: Final

Allegations: MERRILL LYNCH LIFE AGENCY'S VIOLATIONS OF THE LICENSING PROVISION OF THE SOUTH CAROLINA INSURANCE CODE.

Initiated By: SOUTH CAROLINA DEPARTMENT OF INSURANCE

Date Initiated: 02/13/1985

Docket/Case Number: UNKNOWN

Principal Product Type: Insurance

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Undertaking

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 12/13/1985



Sanctions Ordered: Monetary/Fine \$58,000.00

Other Sanctions Ordered:

Sanction Details:

Firm Statement MERRILL LYNCH LIFE AGENCY, WITHOUT ADMITTING ANY OF THE VIOLATIONS, CONSENTED TO AN ADMINISTRATIVE ASSESSMENT, AGREED THAT NONE OF ITS AGENTS WOULD ACT WITHOUT BEING LICENSED AND THAT IT WOULD MAINTAIN AN AGENCY LICENSE AT ALL TIMES IN WHICH IT TRANSACTS THE BUSINESS OF AN INSURANCE AGENT.

Disclosure 124 of 170

Reporting Source: Firm

Affiliate: MERRILL LYNCH LIFE AGENCY INC.

Current Status: Final

Allegations: MERRILL LYNCH LIFE AGENCY AND CERTAIN OF ITS AGENTS WERE NOT PROPERLY LICENSED IN CONNECTION WITH THE SALE OF CERTAIN ANNUITY CONTRACTS.

Initiated By: NORTH CAROLINA COMMISSIONER OF INSURANCE

Date Initiated: 12/07/1984

Docket/Case Number: UNKNOWN

Principal Product Type: Annuity(ies) - Fixed

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 12/07/1984

Sanctions Ordered: Monetary/Fine \$15,000.00
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: MERRILL LYNCH LIFE AGENCY AGREED TO SETTLE WITHOUT ADMITTING OF DENYING ANY OF THE VIOLATIONS.



Disclosure 125 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH LIFE AGENCY INC.
Current Status:	Final
Allegations:	SOLICITING, NEGOTIATING AND EFFECTING COVERAGES OF INSURANCE BY ONE OF ITS FORMER EMPLOYEES PRIOR TO HIS BEING LICENSED.
Initiated By:	NEW JERSEY DEPARTMENT OF INSURANCE
Date Initiated:	06/26/1990
Docket/Case Number:	CONSENT ORDER #90-19
Principal Product Type:	Insurance
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	06/26/1990
Sanctions Ordered:	Monetary/Fine \$5,000.00
Other Sanctions Ordered:	
Sanction Details:	MERRILL LYNCH LIFE AGENCY PAID IN FULL SETTLEMENT OF THE CONSENT ORDER.

Disclosure 126 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH LIFE AGENCY INC.
Current Status:	Final
Allegations:	MERRILL LYNCH LIFE AGENCY AND ITS EMPLOYEES SOLD PRODUCTS WITHOUT BEING PROPERLY LICENSED.
Initiated By:	NEW HAMPSHIRE INSURANCE DEPARTMENT
Date Initiated:	01/30/1984
Docket/Case Number:	UNKNOWN



Principal Product Type: Insurance

Other Product Type(s):

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

Other Sanction(s)/Relief Sought: UNDERTAKING

Resolution: Settled

Resolution Date: 01/30/1984

Sanctions Ordered: Monetary/Fine \$15,000.00

Other Sanctions Ordered:

Sanction Details: UNDERTAKING BY MERRILL LYNCH LIFE AGENCY THAT NO FURTHER SALES OF INSURANCE PRODUCTS IN NEW HAMPSHIRE WOULD BE DONE WITHOUT PROPER LICENSING.

Disclosure 127 of 170

Reporting Source: Firm

Affiliate: MERRILL LYNCH LIFE AGENCY INC.

Current Status: Final

Allegations: MERRILL LYNCH LIFE AGENCYS' SOLICITATIONS OF CERTAIN ANNUITY CONTRACTS BY ACCOUNT EXECUTIVES NOT PROPERLY LICENSED AND NOT HOLDING A VALID CORPORATE LICENSE FOR PERIOD MARCH 1982 TO MAY 1983.

Initiated By: KENTUCKY DEPARTMENT OF INSURANCE

Date Initiated: 10/11/1984

Docket/Case Number: UNKNOWN

Principal Product Type: Annuity(ies) - Fixed

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Settled



Resolution Date:	10/11/1984
Sanctions Ordered:	Monetary/Fine \$56,600.00
Other Sanctions Ordered:	AN ADDITIONAL FINE OF \$43,400 FOR NOT HOLDING A VALID CORPORATE LICENSE.
Sanction Details:	KENTUCKY DEPARTMENT OF INSURANCE ACCEPTED AN OFFER OF SETTLEMENT MADE WITHOUT ADMITTING OR DENYING ANY VIOLATIONS.

Disclosure 128 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH LIFE AGENCY INC.
Current Status:	Final
Allegations:	MERRILL LYNCH LIFE AGENCYS' VIOLATIONS OF THE KANSAS INSURANCE CODE IN CONNECTION WITH THE SALE OF CERTAIN ANNUITY CONTRACTS. CERTAIN MERRILL LYNCH LIFE AGENCY AGENTS WERE NOT PROPERLY LICENSED, FAILED TO DISCLOSE THAT ANNUITY CONTRACTS WERE GROUP CONTRACTS AND INFORMED SOME ANNUITY HOLDERS THAT CONTRACTS WERE GUARANTEED BY AN ENTITY OTHER THAN THE ISSUING CARRIER.
Initiated By:	KANSAS COMMISSIONER OF INSURANCE
Date Initiated:	10/11/1984
Docket/Case Number:	UNKNOWN
Principal Product Type:	Annuity(ies) - Fixed
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	CIVIL AND ADMINISTRATIVE PENALTY(IES)/FINE(S)
Resolution:	Consent
Resolution Date:	10/11/1984
Sanctions Ordered:	Monetary/Fine \$45,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING ANY OF THE VIOLATIONS FIRM CONSENTED TO A



CEASE AND DESIST ORDER AND THE IMPOSITION OF A PENALTY.

Disclosure 129 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH LIFE AGENCY INC.
Current Status:	Final
Allegations:	MERRILL LYNCH LIFE AGENCY VIOLATING THE LICENSING PROVISIONS OF THE GEORGIA INSURANCE CODE.
Initiated By:	GEORGIA COMMISSIONER OF INSURANCE
Date Initiated:	02/04/1985
Docket/Case Number:	UNKNOWN
Principal Product Type:	Insurance
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:	Order
Resolution Date:	02/04/1985
Sanctions Ordered:	Monetary/Fine \$100,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING ANY OF THE VIOLATIONS MERRILL LYNCH LIFE AGENCY CONSENTED TO ISSUANCE OF A CEASE AND DESIST ORDER AND PENALTY.

Disclosure 130 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH INTERNATIONAL & CO. C.V. ("MLICO")
Current Status:	Final
Allegations:	INACCURATE AND INCOMPLETE INFORMATION WAS PROVIDED TO THE SEHK WITH RESPECT TO THE PLACING AND TRADING ML WARRANTS.



Initiated By: STOCK EXCHANGE OF HONG KONG LIMITED ("SEHK")

Date Initiated: 03/31/2000

Docket/Case Number: N/A

Principal Product Type: Other

Other Product Type(s): DERIVATIVE WARRANTS LISTED ON THE SEHK AND ISSUED BY MLICO ("ML WARRANTS")

Principal Sanction(s)/Relief Sought: Reprimand

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 03/31/2000

Firm Statement SEHK ISSUED A PRESS RELEASE ANNOUNCING A SEVERE REPRIMAND OF MLICO ARISING FROM AN INVESTIGATION OF TRADING IN ML WARRANTS BY THE SECURITIES AND FUTURES COMMISSION OF HONG KONG.

Disclosure 131 of 170

Reporting Source: Firm

Affiliate: MERRILL LYNCH FUTURES (SINGAPORE) PTE. LTD.

Current Status: Final

Allegations: MERRILL LYNCH FUTURES (SINGAPORE) PTE. LTD. VIOLATED CERTAIN RULES RELATING TO THE EXECUTION OF ALLOR NON AND CROSS TRADES ON THE FLOOR OF THE SIMEX IN CONNECTION WITH THE NIKKEL 225 FUTURES CONTRACT.

Initiated By: SINGAPORE INTERNATIONAL MONETARY EXCHANGE LIMITED

Date Initiated: 02/10/1999

Docket/Case Number: UNKNOWN

Principal Product Type: Other

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought:



Resolution: Settled

Resolution Date: 02/23/1999

Sanctions Ordered: Monetary/Fine \$2,500.00
Cease and Desist/Injunction

Other Sanctions Ordered: A FINE OF 4000 SINGAPORE DOLLARS (APPROXIMATELY \$2500 US) AND AN ORDER TO CEASE AND DESIST FROM AND FUTURE SUCH CONDUCT.

Sanction Details: THE INDIVIDUAL WHO EXECUTED TWO TRADES IN QUESTION AND MISUNDERSTOOD THE OPERATION OF THE TWO RULES IN QUESTION SINCE ONE WAS A NEW RULE AT THAT TIME.

Disclosure 132 of 170

Reporting Source: Firm

Affiliate: MERRILL LYNCH FAR EAST LIMITED

Current Status: Final

Allegations: THE SFC INVESTIGATED MERRILL LYNCH FAR EAST LIMITED IN CONNECTION WITH THE HOLDING OF 14,181 CONTRACT ON THE HANG SENG CHINA ENTERPRISES INDEX ("HSCel") ON MAY 30, 2013 IN BREACH OF THE PRESCRIBED POSITION LIMIT OF 12,000 CONTRACTS. THE SFC FOUND THAT MERRILL LYNCH FAILED TO IMPLEMENT ADEQUATE INTERNAL CONTROLS TO MONITOR POSITIONS IN HSCel FUTURES AND OPTIONS CONTRACTS TO ENSURE COMPLIANCE WITH THE PRESCRIBED POSITION LIMIT.

Initiated By: HONG KONG SECURITIES AND FUTURES COMMISSION ("SFC")

Date Initiated: 03/11/2015

Docket/Case Number: 513/EN/102

Principal Product Type: Futures - Financial

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Decision

Resolution Date: 04/02/2015



Sanctions Ordered:	Monetary/Fine \$257,571.29
Other Sanctions Ordered:	REPRIMAND
Sanction Details:	MERRILL LYNCH FAR EAST LIMITED WAS REPRIMANDED AND FINE OF HK\$2,000,000 (APPROXIMATELY US\$257,571.29).
Firm Statement	MERRILL LYNCH FAR EAST LIMITED WAS REPRIMANDED AND FINE OF HK\$2,000,000 (APPROXIMATELY US\$257,571.29). IN DETERMINING THE PENALTY, THE SFC HAS TAKEN INTO ACCOUNT MERRILL LYNCH FAR EAST'S COOPERATION AND THAT IT HAS TAKEN STEPS TO STRENGTHEN ITS INTERNAL CONTROLS ON THE MONITORING OF POSITION LIMITS.

Disclosure 133 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH FAR EAST LIMITED (MLFE)
Current Status:	Final
Allegations:	SFC CONDUCTED AN INVESTIGATION OF FORMER MLAP STAFF MEMBERS RELATING TO UNAUTHORIZED AND IMPROPER TRADING OF ML WARRANTS THROUGH NOMINEE ACCOUNTS MAINTAINED BY THEM AT THIRD PARTY UNRELATED BROKERS IN HONG KONG.
Initiated By:	SECURITIES & FUTURES COMMISSION OF HONG KONG ("SFC")
Date Initiated:	03/31/2000
Docket/Case Number:	N/A
Principal Product Type:	Other
Other Product Type(s):	DERIVATIVE WARRANTS LISTED ON THE STOCK EXCHANGE OF HONG KONG, LTD. ("SHK") AND ISSUED BY MERRILL LYNCH INTERNATIONAL & CO. C.V. ("MLICO") ("ML WARRANTS") DERIVATIVE WARRANTS LISTED ON THE STOCK EXCHANGE OF HONG KONG, LTD. ("SHK") AND ISSUED BY MERRILL LYNCH INTERNATIONAL & CO. C.V. ("MLICO"))"ML WARRANTS")
Principal Sanction(s)/Relief Sought:	Reprimand
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	03/31/2000
Firm Statement	SFC ISSUED A PRESS RELEASE ANNOUNCING A SEVERE REPRIMAND OF MLFE AND MERRILL LYNCH (ASIA PACIFIC) LIMITED FOR THEIR FAILURE TO



ADEQUATELY SUPERVISE THE TRADING BY FORMER MLAP EMPLOYEES OF ML WARRANTS.

Disclosure 134 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH EQUITIES AUSTRALIA LIMITED (MLEAL)
Current Status:	Final
Allegations:	ALLEGATIONS THAT DEFICIENCIES WERE IDENTIFIED IN MLEAL'S RELEVANT ORDER RECORDS, SYSTEMS AND PROCESSES. THERE WERE ALLEGATIONS OF DEFICIENCIES IN THREE SEPARATE AGENCY ORDER RECORD MATTERS.
Initiated By:	THE AUSTRALIAN STOCK EXCHANGE (ASX)
Date Initiated:	05/08/2003
Docket/Case Number:	REF: 2003052
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:	OTHER: ORDERED THAT FIRM BE SUBJECT TO AN EDUCATION AND COMPLIANCE PROGRAM FOR CONTRAVENING ASX'S ORDER RECORD REQUIREMENTS.
Resolution:	Order
Resolution Date:	12/21/2004
Sanctions Ordered:	Monetary/Fine \$35,000.00
Other Sanctions Ordered:	ORDERED THAT FIRM BE SUBJECT TO AN EDUCATION AND COMPLIANCE PROGRAM FOR ASX'S ORDER RECORD REQUIREMENTS.
Sanction Details:	
Firm Statement	THE DEFICIENCIES IDENTIFIED IN THE RELEVANT ORDER RECORDS OF THREE MATTERS EVIDENCED FAILINGS OF MLEAL'S SYSTEMS AND PROCESSES AND ITS OBLIGATION TO COMPLY WITH RULE 1.2.1.2. THE FLAWS IN ITS RECORD-KEEPING SYSTEM, AND THE FAILURE TO INPUT OR RECORD DATA CORRECTLY, RESULTED IN THE CREATING OF COMPLETE AND ERRONEOUS ORDER RECORDS. FINE TOTALLING \$35,000.00 (AUD) FOR MATTERS TRANSACTION ON MAY 6TH AND MAY 7TH, 2003.



Disclosure 135 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH CANADA LIMITED
Current Status:	Final
Allegations:	FAILED TO OBTAIN ESSENTIAL NEW ACCOUNT INFORMATION FOR VARIOUS CUSTOMERS; FAILED TO PREVENT A REGISTERED REPRESENTATIVE FROM EXECUTING UNAUTHORIZED TRADES IN THE ACCOUNTS OF CUSTOMERS; FAILED TO PREVENT IMPROPER CROSS TRADING BY THE AFORESAID ACCOUNT EXECUTIVE; AND PERMITTED CERTAIN ACCOUNTS TO BECOME UNDER-MARGINED.
Initiated By:	INVESTMENT DEALERS ASSOCIATION OF CANADA
Date Initiated:	06/24/1981
Docket/Case Number:	UNKNOWN
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:	06/24/1981
Sanctions Ordered:	Monetary/Fine \$250,000.00
Other Sanctions Ordered:	
Sanction Details:	MERRILL LYNCH CANADA LIMITED AGREED TO ACCEPT A FINE IN CONNECTION WITH A DISCIPLINARY PROCEEDING BROUGHT BY THE WESTERN BUSINESS CONDUCT COMMITTEE.

Disclosure 136 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH (ASIA PACIFIC) LIMITED
Current Status:	Final



Allegations:	THE SFC FOUND THAT DURING THE PERIOD FROM DECEMBER 2007 TO OCTOBER 2008, A MANAGING DIRECTOR OF MERRILL LYNCH (ASIA PACIFIC) LIMITED (MLAPL) AND MERRILL LYNCH FUTURES (HONG KONG) LIMITED (MLFHKL) HAD MISMARKED A TRADING BOOK IN EXOTICS OPTIONS (BOOK) BY MANIPULATING THE VOLATILITY MARKS IN THE VALUATION MODEL, AND ACCESSED THE COMPUTER SYSTEM WITHOUT AUTHORITY TO ALTER PRICING PARAMETERS ON VARIOUS OCCASIONS. THE MISMARKING ACTIVITIES, WHICH DID NOT APPLY TO OTHER BOOKS, RESULTED IN THE VALUE OF THE BOOK BEING INFLATED BY APPROXIMATELY US\$25 MILLION AND CAUSED THE ACTUAL LOSS IN THE BOOK TO BE WRONGLY REPORTED INTERNALLY. THE SFC FOUND THAT MLAPL AND MLFHKL DID NOT HAVE ADEQUATE INTERNAL CONTROL PROCEDURES IN PLACE TO MANAGE THE RISKS ASSOCIATED WITH MISMARKING, IN THAT (I)THERE WERE UNCERTAINTY AS TO SUPERVISORY RESPONSIBILITIES OVER THE TRADER AND THE BOOK; (II)THE PRICE VERIFICATION MECHANISM APPLIED TO OTHER TRADING BOOKS WAS NOT APPLIED TO THE BOOK; (III)THERE WERE INADEQUATE CHECKS AND BALANCES OVER THE BOOK TO MITIGATE OPERATION RISKS INCLUDING RISKS ASSOCIATE WITH FRAUD AND DISHONEST ACTIVITIES; (IV)THERE WAS INSUFFICIENT SAFEGUARD OVER INFORMATION SECURITY AND INTEGRITY AS REGARDS THE BOOK; (V)TRADING AND VALUATION POLICIES WERE NOT SUFFICIENTLY IMPLEMENTED OVER THE BOOK; AND (IV)SENIOR MANAGEMENT FAILED TO ADEQUATELY MANAGE THE RISKS ASSOCIATED WITH THE BOOK.
Initiated By:	HONG KONG SECURITIES AND FUTURES COMMISSION (SFC)
Date Initiated:	03/03/2009
Docket/Case Number:	500/3N/703
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	REPRIMAND
Resolution:	Decision
Resolution Date:	05/31/2010
Sanctions Ordered:	Monetary/Fine \$449,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE SFC FINED MLAPL AND MLFHKL HKD\$3,500,000 (USD449,000.00) FOR



SYSTEMS AND CONTROLS FAILINGS ASSOCIATED WITH THE MISMARKING ACTIVITIES IN A TRADING BOOK.

Firm Statement

THE SFC FINED MLAPL AND MLFHKL HKD\$3,500,000 (USD449,000.00) FOR SYSTEMS AND CONTROLS FAILINGS ASSOCIATED WITH THE MISMARKING ACTIVITIES IN A TRADING BOOK. MLAPL AND MLFHKL ACCEPTED THAT ITS SYSTEMS AND CONTROLS FELL SHORT OF THOSE EXPECTED IN RESPECT TO THE BOOK. THE SFC ACCEPTED THAT MLAPL'S AND MLFHKL'S MISCONDUCT WAS NOT INTENTIONAL AND MLAPL AND MLFHKL HAVE TAKEN REMEDIAL STEPS TO ADDRESS THE COMPLIANCE WEAKNESSES. IN DECIDING ON THE SANCTIONS, THE SFC TOOK INTO ACCOUNT MLAPL'S AND MLFHKL'S COOPERATION IN RESOLVING THE CASE.

Reporting Source:

Firm

Affiliate:

MERRILL LYNCH FUTURES (HONG KONG) LIMITED

Current Status:

Final

Allegations:

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

Initiated By:

HONG KONG SECURITIES AND FUTURES COMMISSION (SFC)



Date Initiated:	03/03/2009
Docket/Case Number:	500/3N/703
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	REPRIMAND
Resolution:	Decision
Resolution Date:	05/31/2010
Sanctions Ordered:	Monetary/Fine \$449,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE SFC FINED MLAPL AND MLFHKL HKD\$3,500,000 (USD449,000.00) FOR SYSTEMS AND CONTROLS FAILINGS ASSOCIATED WITH THE MISMARKING ACTIVITIES IN A TRADING BOOK.
Firm Statement	THE SFC FINED MLAPL AND MLFHKL HKD\$3,500,000 (USD449,000.00) FOR SYSTEMS AND CONTROLS FAILINGS ASSOCIATED WITH THE MISMARKING ACTIVITIES IN A TRADING BOOK. MLAPL AND MLFHKL ACCEPTED THAT ITS SYSTEMS AND CONTROLS FELL SHORT OF THOSE EXPECTED IN RESPECT TO THE BOOK. THE SFC ACCEPTED THAT MLAPL'S AND MLFHKL'S MISCONDUCT WAS NOT INTENTIONAL AND MLAPL AND MLFHKL HAVE TAKEN REMEDIAL STEPS TO ADDRESS THE COMPLIANCE WEAKNESSES. IN DECIDING ON THE SANCTIONS, THE SFC TOOK INTO ACCOUNT MLAPL'S AND MLFHKL'S COOPERATION IN RESOLVING THE CASE.

Disclosure 137 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH (ASIA PACIFIC) LIMITED
Current Status:	Final
Allegations:	THE SECURITIES AND FUTURES COMMISSION ("SFC") TOOK THE VIEW THAT MERRILL LYNCH (ASIA PACIFIC) LIMITED ("MLAP") FAILED TO PROPERLY INVESTIGATE THE COMPLAINTS MADE BY 11 CLIENTS OF MLAP IN 2008 AGAINST A FORMER LICENSED REPRESENTATIVE ACCREDITED TO MLAP, IN BREACH OF GENERAL PRINCIPALS 2 AND PARAGRAPH 12.3 OF THE CODE OF CONDUCT FOR PERSONS LICENSED BY OR REGISTERED WITH THE SFC.



Initiated By: HONG KONG SECURITIES AND FUTURES COMMISSION ("SFC")

Date Initiated: 08/22/2012

Docket/Case Number: 515/EN/255

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: REPRIMAND
UNDERTAKING

Resolution: Decision

Resolution Date: 08/22/2012

Sanctions Ordered: Monetary/Fine \$130,632.60

Other Sanctions Ordered: REPRIMANDED, FINED HKD\$3.5 MILLION (APPROXIMATELY USD\$130,632.60) AND UNDERTAKING

Sanction Details: MLAP WAS REPRIMANDED AND FINED HKD\$3.5 MILLION (APPROXIMATELY USD\$130,632.60). IN ADDITION, MLAP AGREED THAT AN INDEPENDENT LAW FIRM AND AUDITOR WOULD CONDUCT A REVIEW OF ALL CLIENT ACCOUNTS HANDLED BY THE FORMER LICENSED REPRESENTATIVE AND ASSESS THE AMOUNT OF LOSS (IF ANY) IN EACH ACCOUNT ARISING AS A RESULT OF THE FORMER LICENSED REPRESENTATIVE'S MISCONDUCT. MLAP ALSO AGREED TO FULL COMPENSATE ANY CLIENT WHOSE ACCOUNT WAS HANDLED BY THE FORMER LICENSED REPRESENTATIVE AND WHO SUFFERED LOSS AS A RESULT OF ANY MISCONDUCT BY THE FORMER LICENSED REPRESENTATIVE LESS ANY COMPENSATION THAT MAY HAVE BEEN PAID ALREADY.

Firm Statement MLAP WAS REPRIMANDED AND FINED HKD\$3.5 MILLION (APPROXIMATELY USD\$130,632.60). IN ADDITION, MLAP AGREED THAT AN INDEPENDENT LAW FIRM AND AUDITOR WOULD CONDUCT A REVIEW OF ALL CLIENT ACCOUNTS HANDLED BY THE FORMER LICENSED REPRESENTATIVE AND ASSESS THE AMOUNT OF LOSS (IF ANY) IN EACH ACCOUNT ARISING AS A RESULT OF THE FORMER LICENSED REPRESENTATIVE'S MISCONDUCT. MLAP ALSO AGREED TO FULL COMPENSATE ANY CLIENT WHOSE ACCOUNT WAS HANDLED BY THE FORMER LICENSED REPRESENTATIVE AND WHO SUFFERED LOSS AS A RESULT OF ANY MISCONDUCT BY THE FORMER LICENSED REPRESENTATIVE LESS ANY COMPENSATION THAT MAY HAVE BEEN PAID ALREADY. THE SFC NOTED THAT MLAP ALREADY COMPENSATED A TOTAL OF NINE OF THE 11 CLIENTS WHO COMPLAINED TO THE SFC AND HAS MADE SIGNIFICANT EFFORTS TO RESOLVE THE



COMPLAINTS OF THE REMAINING TOW COMPLAINANTS. THE SFC FURTHER ACKNOWLEDGE MLAP'S FULL COOPERATION TO RESOLVE THE SFC'S CONCERN AND NOTED THAT IT HAS STRENGTHENED ITS INTERNAL CONTROL SYSTEMS ON COMPLAINTS HANDLING.

Disclosure 138 of 170

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH (ASIA PACIFIC) LIMITED
Current Status:	Final
Allegations:	THE SFC RAISED CONCERNS THAT MERRILL LYNCH (ASIA PACIFIC) LIMITED ("MLAPL") FAILED TO PROPERLY ASSESS THE FINANCIAL SITUATION AND INVESTMENT OBJECTIVES OF OVER 40 OF THE 72 CUSTOMERS WHO INVESTED IN TWO INDEX-LINKED NOTES DURING 2007. THE SFC WAS ALSO CONCERNED THAT KEY PRODUCT INFORMATION WAS ONLY PROVIDED TO CLIENTS AFTER THEY HAD AGREED TO INVEST IN THE INDEX-LINKED NOTES AND THAT MLAPL KEPT INADEQUATE DOCUMENTATION TO EXPLAIN THE RATIONALE BEHIND THE ADVISE THEY HAD GIVEN TO THEIR CUSTOMERS.
Initiated By:	HONG KONG SECURITIES AND FUTURES COMMISSION ("SFC")
Date Initiated:	12/09/2010
Docket/Case Number:	500/EN/715
Principal Product Type:	Derivative(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	REPRIMAND, REPURCHASE PROGRAM AND UNDERTAKINGS
Resolution:	Settled
Resolution Date:	05/12/2011
Sanctions Ordered:	Monetary/Fine \$385,921.00
Other Sanctions Ordered:	REPRIMAND, REPURCHASE PROGRAM AND UNDERTAKINGS
Sanction Details:	THE SFC ISSUED A REPRIMAND TO MLAPL AND FINED IT HKD3 MILLION (USD385,921). IN ADDITION, MLAPL HAS AGREED TO IMPLEMENT A RESOLUTION SCHEME IN WHICH IT WILL MAKE PAYMENT TO REPURCHASE FROM CUSTOMERS HOLDING THE OUTSTANDING INDEX-LINKED NOTES



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

Firm Statement

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

Disclosure 139 of 170

Reporting Source:	Firm
Affiliate:	MERITPLAN INSURANCE COMPANY
Current Status:	Final
Allegations:	THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES (THE "DFS") ENGAGED IN SETTLEMENT DISCUSSIONS WITH BALBOA INSURANCE COMPANY ("BIC"), MERITPLAN INSURANCE COMPANY ("MIC"), BA INSURANCE GROUP, INC. AND CERTAIN UNAFFILIATED ENTITIES (COLLECTIVELY, THE "RESPONDENTS") IN CONNECTION WITH AN INVESTIGATION CONCERNING SO CALLED FORCE-PLACED INSURANCE



OR LENDER-PLACED INSURANCE POLICIES ISSUED IN NEW YORK STATE. ON APRIL 18, 2013, THE DFS ISSUED A CONSENT ORDER AGAINST THE RESPONDENTS FINDING THAT BIC AND MIC VIOLATED NEW YORK INSURANCE LAW SECTION 2303, AND 2403. SPECIFICALLY, THE CONSENT ORDER FOUND THAT SPECIFIED PRACTICES BY RESPONDENTS CONCERNING (1)THE LENDER-PLACED INSURANCE RATED AND ASSOCIATED RATIOS AND (2)THE POTENTIAL CONFLICT OF INTEREST PRESENTED BY THE PROVISION OF LENDER-PLACED INSURANCE TO AFFILIATED PARTIES VIOLATED THE REFERENCED PROVISIONS OF THE NEW YORK INSURANCE LAW.

Initiated By: NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES

Date Initiated: 04/18/2013

Docket/Case Number: IN THE MATTER OF BALBOA INSURANCE CO., ET AL.

Principal Product Type: Other

Other Product Type(s): RESIDENTIAL MORTGAGE LENDER-PLACED INSURANCE

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

Other Sanction(s)/Relief Sought: COST OF CLAIMS ADMINISTRATOR, RESTITUTION, AND CERTAIN REMEDIAL ACTIONS (SEE ITEM 12.B BELOW)

Resolution: Consent

Resolution Date: 04/18/2013

Sanctions Ordered: Monetary/Fine \$6,000,000.00
Cease and Desist/Injunction

Other Sanctions Ordered: THE CONSENT ORDER REQUIRES QBE INSURANCE CORPORATION TO PAY, ON BEHALF OF BIC AND MIC, A CIVIL PENALTY OF \$6 MILLION, COSTS OF THE CLAIMS ADMINISTRATOR AND RESTITUTION PURSUANT TO A PRE-EXISTING CONTRACTUAL ARRANGEMENT BETWEEN QBE INSURANCE CORPORATE AND BIC AND MIC. IN ADDITION, THE CONSENT ORDER REQUIRES CERTAIN REMEDIAL ACTIONS.

Sanction Details: THE TERMS OF THE CONSENT ORDER APPLY TO BIC, MIC, AND CERTAIN SUBSIDIARIES OR AFFILIATES OF BA INSURANCE GROUP, INC. BA INSURANCE GROUP, INC. IS PARTY TO THE CONSENT ORDER SOLELY FOR THE PURPOSE OF BINDING CERTAIN OF ITS SUBSIDIARIES OR AFFILIATES. IN THE CONSENT ORDER, BIC AND MIC, WHICH NEITHER ADMITTED NOR DENIED THE FINDING OR ALLEGATIONS IN THE CONSENT ORDER, AGREED TO CEASE AND DESIST FROM ENGAGING IN ANY ACTS IN VIOLATION OF THE NEW YORK INSURANCE LAW AND FINANCIAL SERVICES LAW AND WILL COMPLY WITH THE NEW YORK INSURANCE LAW AND FINANCIAL SERVICES LAW. THE CONSENT ORDER REQUIRES QBE INSURANCE



CORPORATION TO PAY, ON BEHALF OF BIC AND MIC, A CIVIL PENALTY OF \$6 MILLION, COSTS OF THE CLAIMS ADMINISTRATOR AND RESTITUTION PURSUANT TO A PRE-EXISTING CONTRACTUAL ARRANGEMENT BETWEEN QBE INSURANCE CORPORATION AND BIC AND MIC. IN ADDITION, THE CONSENT ORDER REQUIRES CERTAIN REMEDIAL ACTIONS. THE CIVIL PENALTY WAS PAID ON APRIL 23, 2013.

Firm Statement

IN THE SETTLEMENT WITH THE DFS, THE RESPONDENTS AGREED TO CONSENT TO THE ENTRY OF THE CONSENT ORDER NEITHER AGREED NOR DENIED THE FINDINGS AND ALLEGATIONS IN THE CONSENT ORDER. ON APRIL 18, 2013, THE DFS ISSUED THE CONSENT ORDER, THE HIGHLIGHTS OF WHICH ARE DESCRIBED ABOVE IN ITEM 7. THE SANCTIONS IMPOSED ARE EXPLAINED ABOVE IN ITEM 12.

Reporting Source:

Firm

Affiliate:

BA INSURANCE GROUP, INC.

Current Status:

Final

Allegations:

THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES (THE "DFS") ENGAGED IN SETTLEMENT DISCUSSIONS WITH BALBOA INSURANCE COMPANY ("BIC"), MERITPLAN INSURANCE COMPANY ("MIC"), BA INSURANCE GROUP, INC. AND CERTAIN UNAFFILIATED ENTITIES (COLLECTIVELY, THE "RESPONDENTS") IN CONNECTION WITH AN INVESTIGATION CONCERNING SO CALLED FORCE-PLACED INSURANCE OR LENDER-PLACED INSURANCE POLICIES ISSUED IN NEW YORK STATE. ON APRIL 18, 2013, THE DFS ISSUED A CONSENT ORDER AGAINST THE RESPONDENTS FINDING THAT BIC AND MIC VIOLATED NEW YORK INSURANCE LAW SECTION 2303, AND 2403. SPECIFICALLY, THE CONSENT ORDER FOUND THAT SPECIFIED PRACTICES BY RESPONDENTS CONCERNING (1)THE LENDER-PLACED INSURANCE RATED AND ASSOCIATED RATIOS AND (2)THE POTENTIAL CONFLICT OF INTEREST PRESENTED BY THE PROVISION OF LENDER-PLACED INSURANCE TO AFFILIATED PARTIES VIOLATED THE REFERENCED PROVISIONS OF THE NEW YORK INSURANCE LAW.

Initiated By:

NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES

Date Initiated:

04/18/2013

Docket/Case Number:

IN THE MATTER OF BALBOA INSURANCE CO., ET AL.

Principal Product Type:

Other

Other Product Type(s):

RESIDENTIAL MORTGAGE LENDER-PLACED INSURANCE



Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	COST OF CLAIMS ADMINISTRATOR, RESTITUTION, AND CERTAIN REMEDIAL ACTIONS (SEE ITEM 12.B BELOW)
Resolution:	Consent
Resolution Date:	04/18/2013
Sanctions Ordered:	Monetary/Fine \$6,000,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	THE CONSENT ORDER REQUIRES QBE INSURANCE CORPORATION TO PAY, ON BEHALF OF BIC AND MIC, A CIVIL PENALTY OF \$6 MILLION, COSTS OF THE CLAIMS ADMINISTRATOR AND RESTITUTION PURSUANT TO A PRE-EXISTING CONTRACTUAL ARRANGEMENT BETWEEN QBE INSURANCE CORPORATE AND BIC AND MIC. IN ADDITION, THE CONSENT ORDER REQUIRES CERTAIN REMEDIAL ACTIONS.
Sanction Details:	THE TERMS OF THE CONSENT ORDER APPLY TO BIC, MIC, AND CERTAIN SUBSIDIARIES OR AFFILIATES OF BA INSURANCE GROUP, INC. BA INSURANCE GROUP, INC. IS PARTY TO THE CONSENT ORDER SOLELY FOR THE PURPOSE OF BINDING CERTAIN OF ITS SUBSIDIARIES OR AFFILIATES. IN THE CONSENT ORDER, BIC AND MIC, WHICH NEITHER ADMITTED NOR DENIED THE FINDING OR ALLEGATIONS IN THE CONSENT ORDER, AGREED TO CEASE AND DESIST FROM ENGAGING IN ANY ACTS IN VIOLATION OF THE NEW YORK INSURANCE LAW AND FINANCIAL SERVICES LAW AND WILL COMPLY WITH THE NEW YORK INSURANCE LAW AND FINANCIAL SERVICES LAW. THE CONSENT ORDER REQUIRES QBE INSURANCE CORPORATION TO PAY, ON BEHALF OF BIC AND MIC, A CIVIL PENALTY OF \$6 MILLION, COSTS OF THE CLAIMS ADMINISTRATOR AND RESTITUTION PURSUANT TO A PRE-EXISTING CONTRACTUAL ARRANGEMENT BETWEEN QBE INSURANCE CORPORATION AND BIC AND MIC. IN ADDITION, THE CONSENT ORDER REQUIRES CERTAIN REMEDIAL ACTIONS. THE CIVIL PENALTY WAS PAID ON APRIL 23, 2013.
Firm Statement	IN THE SETTLEMENT WITH THE DFS, THE RESPONDENTS AGREED TO CONSENT TO THE ENTRY OF THE CONSENT ORDER NEITHER AGREED NOR DENIED THE FINDINGS AND ALLEGATIONS IN THE CONSENT ORDER. ON APRIL 18, 2013, THE DFS ISSUED THE CONSENT ORDER, THE HIGHLIGHTS OF WHICH ARE DESCRIBED ABOVE IN ITEM 7. THE SANCTIONS IMPOSED ARE EXPLAINED ABOVE IN ITEM 12.

Reporting Source:	Firm
Affiliate:	BALBOA INSURANCE COMPANY



Current Status:	Final
Allegations:	THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES (THE "DFS") ENGAGED IN SETTLEMENT DISCUSSIONS WITH BALBOA INSURANCE COMPANY ("BIC"), MERITPLAN INSURANCE COMPANY ("MIC"), BA INSURANCE GROUP, INC. AND CERTAIN UNAFFILIATED ENTITIES (COLLECTIVELY, THE "RESPONDENTS") IN CONNECTION WITH AN INVESTIGATION CONCERNING SO CALLED FORCE-PLACED INSURANCE OR LENDER-PLACED INSURANCE POLICIES ISSUED IN NEW YORK STATE. ON APRIL 18, 2013, THE DFS ISSUED A CONSENT ORDER AGAINST THE RESPONDENTS FINDING THAT BIC AND MIC VIOLATED NEW YORK INSURANCE LAW SECTION 2303, AND 2403. SPECIFICALLY, THE CONSENT ORDER FOUND THAT SPECIFIED PRACTICES BY RESPONDENTS CONCERNING (1)THE LENDER-PLACED INSURANCE RATED AND ASSOCIATED RATIOS AND (2)THE POTENTIAL CONFLICT OF INTEREST PRESENTED BY THE PROVISION OF LENDER-PLACED INSURANCE TO AFFILIATED PARTIES VIOLATED THE REFERENCED PROVISIONS OF THE NEW YORK INSURANCE LAW.
Initiated By:	NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES
Date Initiated:	04/18/2013
Docket/Case Number:	IN THE MATTER OF BALBOA INSURANCE CO., ET AL.
Principal Product Type:	Other
Other Product Type(s):	RESIDENTIAL MORTGAGE LENDER-PLACED INSURANCE
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	COST OF CLAIMS ADMINISTRATOR, RESTITUTION, AND CERTAIN REMEDIAL ACTIONS (SEE ITEM 12.B BELOW)
Resolution:	Consent
Resolution Date:	04/18/2013
Sanctions Ordered:	Monetary/Fine \$6,000,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	THE CONSENT ORDER REQUIRES QBE INSURANCE CORPORATION TO PAY, ON BEHALF OF BIC AND MIC, A CIVIL PENALTY OF \$6 MILLION, COSTS OF THE CLAIMS ADMINISTRATOR AND RESTITUTION PURSUANT TO A PRE-EXISTING CONTRACTUAL ARRANGEMENT BETWEEN QBE INSURANCE CORPORATE AND BIC AND MIC. IN ADDITION, THE CONSENT ORDER REQUIRES CERTAIN REMEDIAL ACTIONS.
Sanction Details:	THE TERMS OF THE CONSENT ORDER APPLY TO BIC, MIC, AND CERTAIN SUBSIDIARIES OR AFFILIATES OF BA INSURANCE GROUP, INC. BA



INSURANCE GROUP, INC. IS PARTY TO THE CONSENT ORDER SOLELY FOR THE PURPOSE OF BINDING CERTAIN OF ITS SUBSIDIARIES OR AFFILIATES. IN THE CONSENT ORDER, BIC AND MIC, WHICH NEITHER ADMITTED NOR DENIED THE FINDING OR ALLEGATIONS IN THE CONSENT ORDER, AGREED TO CEASE AND DESIST FROM ENGAGING IN ANY ACTS IN VIOLATION OF THE NEW YORK INSURANCE LAW AND FINANCIAL SERVICES LAW AND WILL COMPLY WITH THE NEW YORK INSURANCE LAW AND FINANCIAL SERVICES LAW. THE CONSENT ORDER REQUIRES QBE INSURANCE CORPORATION TO PAY, ON BEHALF OF BIC AND MIC, A CIVIL PENALTY OF \$6 MILLION, COSTS OF THE CLAIMS ADMINISTRATOR AND RESTITUTION PURSUANT TO A PRE-EXISTING CONTRACTUAL ARRANGEMENT BETWEEN QBE INSURANCE CORPORATION AND BIC AND MIC. IN ADDITION, THE CONSENT ORDER REQUIRES CERTAIN REMEDIAL ACTIONS. THE CIVIL PENALTY WAS PAID ON APRIL 23, 2013.

Firm Statement

IN THE SETTLEMENT WITH THE DFS, THE RESPONDENTS AGREED TO CONSENT TO THE ENTRY OF THE CONSENT ORDER NEITHER AGREED NOR DENIED THE FINDINGS AND ALLEGATIONS IN THE CONSENT ORDER. ON APRIL 18, 2013, THE DFS ISSUED THE CONSENT ORDER, THE HIGHLIGHTS OF WHICH ARE DESCRIBED ABOVE IN ITEM 7. THE SANCTIONS IMPOSED ARE EXPLAINED ABOVE IN ITEM 12.

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Reporting Source:	Firm
Affiliate:	FLEET FINANCIAL GROUP, INC. (PREDECESSOR TO FLEETBOSTON FINANCIAL CORPORATION-NOW KNOWN AS BANK OF AMERICA CORPORATION)
Current Status:	Final
Allegations:	NORSTAR BANCORP, INC., THE PREDECESSOR OF FLEET FINANCIAL GROUP, VOLUNTARILY BROUGHT TO THE ATTENTION OF THE TREASURY DEPARTMENT NUMEROUS VIOLATIONS OF THE BANK SECRECY ACT FOR FAILURE TO REPORT CURRENCY TRANSACTIONS BETWEEN 1980 AND 1985 BY THREE BANK SUBSIDIARIES.
Initiated By:	U.S. DEPARTMENT OF TREASURY
Date Initiated:	01/01/1985
Docket/Case Number:	N/A
Principal Product Type:	Other
Other Product Type(s):	CURRENCY TRANSACTIONS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)


Other Sanction(s)/Relief Sought:

Resolution: Settled
Resolution Date: 12/30/1985
Sanctions Ordered: Monetary/Fine \$269,904.00
Other Sanctions Ordered:
Sanction Details: TREASURY DEPARTMENT ASSESSED AGAINST NORSTAR A CIVIL PENALTY OF \$269,904 IN COMPLETE SETTLEMENT OF NORSTAR'S CIVIL LIABILITY FOR VIOLATIONS BY THREE BANK SUBSIDIARIES.

Disclosure 141 of 170

Reporting Source: Firm
Affiliate: FLEET FINANCIAL GROUP, INC. (PREDECESSOR TO FLEETBOSTON FINANCIAL CORPORATION-NOW KNOWN AS BANK OF AMERICA CORPORATION)
Current Status: Final
Allegations: PRIOR TO ITS AFFILIATION WITH FLEET, SHAWMUT BANK OF BOSTON, N.A., ACCEPTED AN AGREEMENT IN 1983 WITH THE OFFICE OF THE COMPTROLLER OF THE CURRENCY THAT TEMPORARILY AND PARTIALLY RESTRICTED THE EXPANSION OF SHAWMUT'S TRANSFER AGENT SERVICING OPERATION.
Initiated By: OFFICE OF THE COMPTROLLER OF CURRENCY
Date Initiated: 01/01/1983
Docket/Case Number: N/A
Principal Product Type: Other
Other Product Type(s): TRANSFER AGENT SERVICES
Principal Sanction(s)/Relief Sought: Other
Other Sanction(s)/Relief Sought: AGREEMENT WAS TERMINATED
Resolution: Other
Resolution Date: 06/30/1984
Sanctions Ordered:



Other Sanctions Ordered:	N/A
Sanction Details:	PRIOR TO ITS AFFILIATION WITH FLEET, SHAWMUT BANK OF BOSTON, N.A., ACCEPTED AN AGREEMENT IN 1983 WITH THE OFFICE OF THE COMPTROLLER OF THE CURRENCY THAT TEMPORARILY AND PARTIALLY RESTRICTED THE EXPANSION OF SHAWMUT'S TRANSFER AGENT SERVICING OPERATION. THE AGREEMENT WAS TERMINATED, REMOVING RESTRICTION IN 1984. FLEET FINANCIAL GROUP MERGED WITH SHAWMUT NATIONAL CORPORATION IN 1995.
Firm Statement	PRIOR TO ITS AFFILIATION WITH FLEET, SHAWMUT BANK OF BOSTON, N.A., ACCEPTED AN AGREEMENT IN 1983 WITH THE OFFICE OF THE COMPTROLLER OF THE CURRENCY THAT TEMPORARILY AND PARTIALLY RESTRICTED THE EXPANSION OF SHAWMUT'S TRANSFER AGENT SERVICING OPERATION. THE AGREEMENT WAS TERMINATED, REMOVING RESTRICTION IN 1984. FLEET FINANCIAL GROUP MERGED WITH SHAWMUT NATIONAL CORPORATION IN 1995.

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Reporting Source:	Firm
Affiliate:	FIRST NATIONAL BANK OF BOSTON (NKA BANK OF AMERICA, N.A.)
Current Status:	Final
Allegations:	THAT FNBB, IN CONNECTION WITH ITS CORPORATE TRUST BUSINESS, HAD VIOLATED CERTAIN RECORDKEEPING AND CUSTOMER RESPONSE PROVISIONS OF THE SEC'S TRANSFER AGENT REGULATIONS.
Initiated By:	OFFICE OF THE COMPTROLLER OF CURRENCY
Date Initiated:	12/31/1990
Docket/Case Number:	AA-SCP-92-110
Principal Product Type:	Other
Other Product Type(s):	TRANSFER AGENT SERVICES
Principal Sanction(s)/Relief Sought:	Undertaking
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	12/31/1990
Sanctions Ordered:	



Other Sanctions Ordered:	N/A
Sanction Details:	THE COMPTROLLER ACCEPTED FNBB'S OFFER OF SETTLEMENT, UNDER WHICH FNBB CONSENTED TO THE COMPTROLLER'S ISSUANCE OF AN ORDER FINDING THAT FNBB HAD WILLFULLY VIOLATED CERTAIN RECORDKEEPING AND CUSTOMER RESPONSE PROVISIONS OF THE SEC'S TRANSFER AGENT REGULATIONS AND IMPOSING REMEDIAL MEASURES DESIGNED TO PREVENT THE RECURRENCE OF THE ALLEGED VIOLATIONS.
Firm Statement	THE COMPTROLLER TERMINATED ITS CONSENT ORDER ON MAY 1, 1992, FOLLOWING AN EXAMINATION IN WHICH IT DETERMINED THAT FNBB HAS SATISFACTORILY COMPLETED THE REQUIRED REMEDIAL ACTIONS.

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



Sanction Details:	THE COMPTROLLER ACCEPTED FNBB'S OFFER OF SETTLEMENT, UNDER WHICH FNBB CONSENTED TO THE ISSUANCE OF AN ORDER FINDING THAT FNBB (1)CEASE AND DESIST FROM VIOLATING THOSE PROVISIONS, (2)IMPLEMENT POLICIES AND PROCEDURES DESIGNED TO ENSURE FUTURE COMPLIANCE, (3)PAY A CIVIL PENALTY OF \$100,000
Firm Statement	THE SETTLEMENT ENTERED INTO BY FNBB WAS PART OF THE INDUSTRY-WIDE INVESTIGATION OF THE DEBT SECURITIES MARKETS PERTAINING TO GSE'S. PURSUANT TO THE SETTLEMENT, THE COMPTROLLER AND OTHER REGULATORY AGENCIES CONCLUDED THEIR INVESTIGATION AS TO 98 GOVERNMENT SECURITIES BROKER AND DEALERS, INCLUDING FNBB, THAT HAD PARTICIPATED AS SELLING GROUP MEMBERS IN THE PRIMARY DISTRIBUTION OF DEBT SECURITIES FOR THE GSE'S. FNBB HAS INSTITUTED PROCEDURES TO COMPLY WITH THE SETTLEMENT AS WELL AS THE SEPARATE REQUIREMENTS MANDATED BY THE INDIVIDUAL GSE'S. THERE HAS BEEN NO RECURRENCE OF THE ALLEGED VIOLATIONS.

Disclosure 144 of 170

Reporting Source:	Firm
Affiliate:	BOSTON SECURITIES S.A. SOCIEDAD DE BOLSA
Current Status:	Final
Allegations:	ON SEPTEMBER 21, 2011, BUENOS AIRES (ARGENTINA) STOCK EXCHANGE INITIATED AN ADMINISTRATIVE PROCEEDING AGAINST BOSTON SECURITIES S.A. SOCIEDAD DE BOLSA AND SEVEN OF ITS FORMER DIRECTORS, ALLEGING NEGLIGENCE AND LACK OF CONTROL ON ONE FORMER EMPLOYEE'S ACTIVITIES ON THE GROUNDS OF SECTIONS 4, 22 AND 42 OF ITS INTERNAL CODE.
Initiated By:	BUENOS AIRES (ARGENTINA) STOCK EXCHANGE
Date Initiated:	09/21/2011
Docket/Case Number:	NONE
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Suspension
Other Sanction(s)/Relief Sought:	
Resolution:	Consent



Resolution Date:	12/12/2012
Sanctions Ordered:	Suspension
Other Sanctions Ordered:	N/A
Sanction Details:	THIRTY (30) DAY SUSPENSION TO BOSTON SECURITIES S.A. SOCIEDAD DE BOLSA FROM DECEMBER 13, 2012. THE CHARGES AGAINST THE SEVEN DIRECTORS WERE DISMISSED.
Firm Statement	THIRTY (30) DAY SUSPENSION TO BOSTON SECURITIES S.A. SOCIEDAD DE BOLSA FROM DECEMBER 13, 2012. THE CHARGES AGAINST THE SEVEN DIRECTORS WERE DISMISSED.

Disclosure 145 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA NT & SA
Current Status:	Final
Allegations:	VIOLATIONS OF BOOKS AND RECORDKEEPING PROVISIONS AS WELL AS OTHER PROVISIONS OF THE U.S. SECURITIES LAWS.
Initiated By:	OFFICE OF THE COMPTROLLER OF CURRENCY
Date Initiated:	07/23/1987
Docket/Case Number:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	07/23/1987
Sanctions Ordered:	Censure
Other Sanctions Ordered:	
Sanction Details:	BOFA WAS SANCTIONED BY THE OCC. PURSUANT TO THE ORDER, BOFA WAS CENSURED, TWO BOFA OFFICERS WERE SUSPENDED FOR SEVERAL DAYS AND BOFA WAS DIRECTED TO ADOPT CERTAIN POLICIES AND PROCEDURES AND TO CREATE A COMPLIANCE REVIEW COMMITTEE. THE



ORDER WAS LIFTED IN 1991.

Firm Statement

BOFA WAS BY THE OCC DUE TO PROBLEMS ASSOCIATED WITH AN ATTEMPTED CONVERSION TO A NEW SECURITIES TRADE PROCESSING & RECORD-KEEPING SYSTEM. THE OCC FOUND THAT DUE TO SYSTEMS PROBLEMS, BOFA VIOLATED BOOKS & RECORD-KEEPING PROVISIONS AS WELL AS OTHER PROVISIONS OF THE U.S. SECURITIES LAWS. THE ORDER WAS LIFTED IN 1991.

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Reporting Source:	Firm
Affiliate:	BOFA ADVISORS, LLC
Current Status:	Final
Allegations:	PURSUANT TO OFFERS OF SETTLEMENT BY COLUMBIA MANAGEMENT ADVISORS, INC. ("CMA") (N/K/A BOFA ADVISORS, LLC) AND COLUMBIA FUNDS DISTRIBUTORS, INC. ("CFDI") (N/K/A BOFA DISTRIBUTORS, INC.) IN WHICH THEY NEITHER ADMITTED NOR DENIED THE FINDINGS. THE SEC ENTERED AN ORDER ON 2/9/05 FINDING THAT, FROM AT LEAST 1998 THROUGH OCTOBER, 2003, CMA AND CFDI VIOLATED THE FEDERAL SECURITIES LAWS BY ENTERING INTO ARRANGEMENTS WITH 9 INVESTORS THAT ALLOWED THEM TO ENGAGED IN SHORT-TERM OR EXCESSIVE TRADING, CONTRARY TO RESTRICTIONS AND/OR REPRESENTATIONS IN THE COLUMBIA FUNDS' PROSPECTUSES, AND ALLOWING OR FAILING TO PREVENT OTHER INVESTORS FROM ENGAGING IN A PRACTICE OF SHORT-TERM OR EXCESSIVE TRADING. THE ORDER ALSO FOUND THAT CMA FAILED TO MAINTAIN POLICIES AND PROCEDURES TO PREVENT MISUSE OF MATERIAL NON-PUBLIC INFORMATION ABOUT PORTFOLIO HOLDINGS.
Initiated By:	U.S. SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	02/09/2005
Docket/Case Number:	
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	MONETARY/FINE, CENSURE AND DISGORGEMENT/RESTITUTION. SEE ITEM 12.B. FOR FURTHER DETAILS
Resolution:	Consent



Resolution Date:	02/09/2005
Sanctions Ordered:	Censure Monetary/Fine \$70,000,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	THE SEC ORDER PROVIDES THAT: CMA & CFDI ARE CENSURED; CMA SHALL CEASE & DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS & ANY FUTURE VIOLATIONS OF §§204A, 206(1) & 206(2) OF THE ADVISERS ACT & SS17(D) & 34(B) OF THE INVESTMENT COMPANY ACT & RULE 17D-1 THEREUNDER; CFDI SHALL CEASE & DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS & ANY FUTURE VIOLATIONS OF S.17(A) OF THE ADVISERS ACT & SS17(D) & 34(B) OF THE INVESTMENT COMPANY ACT & RULE 17D-1 THEREUNDER; CMA & CFDI SHALL PAY ON A JOINT & SEVERAL BASIS, \$70M IN DISGORGEMENT PLUS A CIVIL MONEY PENALTY OF \$70M; CMA & CFDI SHALL COMPLY WITH REMEDIAL UNDERTAKINGS AS DESCRIBED IN ITEM 13.
Sanction Details:	CMA & CFDI SHALL PAY, ON A JOINT AND SEVERAL BASIS, \$70M IN DISGORGEMENT AND A CIVIL MONEY PENALTY OF \$70M WITHIN 20 DAYS OF ENTRY OF THE ORDER. THESE FUNDS ARE TO BE DISTRIBUTED UNDER DIRECTION OF THE DISTRIBUTION CONSULTANT.
Firm Statement	THE SEC ORDER PROVIDES THAT (1)CMA AND CFDI SHALL MAINTAIN A COMPLIANCE AND ETHICS OVERSIGHT INFRASTRUCTURE HAVING, AMONG OTHER ELEMENTS, A CODE OF ETHICS OVERSIGHT COMMITTEE, AN INTERNAL COMPLIANCE CONTROLS COMMITTEE, A SENIOR LEVEL COMPLIANCE OFFICER FOR CONFLICTS OF INTEREST, AND A CORPORATE OMBUDSMAN; (2)CMA AND CFDI SHALL RETAIN INDEPENDENT COMPLIANCE CONSULTANTS TO, AMONG OTHER THINGS, REVIEW CMA AND CFDI COMPLIANCE, SUPERVISORY, AND OTHER POLICIES AND PROCEDURES; (3)CMA AND CFDI SHALL ADOPT THE RECOMMENDATIONS OF SUCH CONSULTANTS SUBJECT TO A MECHANISM FOR RESOLVING DISAGREEMENTS; (4)CMA AND CFDI SHALL UNDERGO THIRD PARTY COMPLIANCE REVIEW EVERY OTHER YEAR; (5)CMA AND CFDI SHALL RETAIN AN INDEPENDENT DISTRIBUTION CONSULTANT; AND (6)CMA AND CFDI SHALL PAY, ON A JOINT AND SEVERAL BASIS, \$70M IN DISGORGEMENT PLUS A CIVIL PENALTY OF \$70M. IN ADDITION, THE FUNDS THEN KNOWN THE COLUMBIA FUNDS VOLUNTARILY HAVE UNDERTAKEN TO OPERATE IN ACCORDANCE WITH CERTAIN GOVERNANCE POLICIES AND PRACTICES INCLUDING REQUIRING 75% OF TRUSTEES MEET INDEPENDENCE STANDARDS, THE CHAIRMAN TO BE INDEPENDENT, AND COUNSEL TO THE INDEPENDENT TRUSTEES MEET INDEPENDENCE STANDARDS.



Reporting Source:	Firm
Affiliate:	BOFA DISTRIBUTORS, INC.
Current Status:	Final
Allegations:	PURSUANT TO OFFERS OF SETTLEMENT BY COLUMBIA MANAGEMENT ADVISORS, INC. ("CMA") (N/K/A BOFA ADVISORS, LLC) AND COLUMBIA FUNDS DISTRIBUTORS, INC. ("CFDI") (N/K/A BOFA DISTRIBUTORS, INC.) IN WHICH THEY NEITHER ADMITTED NOR DENIED THE FINDINGS. THE SEC ENTERED AN ORDER ON 2/9/05 FINDING THAT, FROM AT LEAST 1998 THROUGH OCTOBER, 2003, CMA AND CFDI VIOLATED THE FEDERAL SECURITIES LAWS BY ENTERING INTO ARRANGEMENTS WITH 9 INVESTORS THAT ALLOWED THEM TO ENGAGED IN SHORT-TERM OR EXCESSIVE TRADING, CONTRARY TO RESTRICTIONS AND/OR REPRESENTATIONS IN THE COLUMBIA FUNDS' PROSPECTUSES, AND ALLOWING OR FAILING TO PREVENT OTHER INVESTORS FROM ENGAGING IN A PRACTICE OF SHORT-TERM OR EXCESSIVE TRADING. THE ORDER ALSO FOUND THAT CMA FAILED TO MAINTAIN POLICIES AND PROCEDURES TO PREVENT MISUSE OF MATERIAL NON-PUBLIC INFORMATION ABOUT PORTFOLIO HOLDINGS.
Initiated By:	U.S. SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	02/09/2005
Docket/Case Number:	
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	MONETARY/FINE, CENSURE AND DISGORGEMENT/RESTITUTION. SEE ITEM 12.B. FOR FURTHER DETAILS
Resolution:	Consent
Resolution Date:	02/09/2005
Sanctions Ordered:	Censure Monetary/Fine \$70,000,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	THE SEC ORDER PROVIDES THAT: CMA & CFDI ARE CENSURED; CMA SHALL CEASE & DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS & ANY FUTURE VIOLATIONS OF §§204A, 206(1) & 206(2) OF THE ADVISERS ACT & SS17(D) & 34(B) OF THE INVESTMENT COMPANY ACT & RULE 17D-1



THEREUNDER; CFDI SHALL CEASE & DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS & ANY FUTURE VIOLATIONS OF S.17(A) OF THE ADVISERS ACT & SS17(D) & 34(B) OF THE INVESTMENT COMPANY ACT & RULE 17D-1 THEREUNDER; CMA & CFDI SHALL PAY ON A JOINT & SEVERAL BASIS, \$70M IN DISGORGEMENT PLUS A CIVIL MONEY PENALTY OF \$70M; CMA & CFDI SHALL COMPLY WITH REMEDIAL UNDERTAKINGS AS DESCRIBED IN ITEM 13.

Sanction Details:

CMA & CFDI SHALL PAY, ON A JOINT AND SEVERAL BASIS, \$70M IN DISGORGEMENT AND A CIVIL MONEY PENALTY OF \$70M WITHIN 20 DAYS OF ENTRY OF THE ORDER. THESE FUNDS ARE TO BE DISTRIBUTED UNDER DIRECTION OF THE DISTRIBUTION CONSULTANT.

Firm Statement

THE SEC ORDER PROVIDES THAT (1)CMA AND CFDI SHALL MAINTAIN A COMPLIANCE AND ETHICS OVERSIGHT INFRASTRUCTURE HAVING, AMONG OTHER ELEMENTS, A CODE OF ETHICS OVERSIGHT COMMITTEE, AN INTERNAL COMPLIANCE CONTROLS COMMITTEE, A SENIOR LEVEL COMPLIANCE OFFICER FOR CONFLICTS OF INTEREST, AND A CORPORATE OMBUDSMAN; (2)CMA AND CFDI SHALL RETAIN INDEPENDENT COMPLIANCE CONSULTANTS TO, AMONG OTHER THINGS, REVIEW CMA AND CFDI COMPLIANCE, SUPERVISORY, AND OTHER POLICIES AND PROCEDURES; (3)CMA AND CFDI SHALL ADOPT THE RECOMMENDATIONS OF SUCH CONSULTANTS SUBJECT TO A MECHANISM FOR RESOLVING DISAGREEMENTS; (4)CMA AND CFDI SHALL UNDERGO THIRD PARTY COMPLIANCE REVIEW EVERY OTHER YEAR; (5)CMA AND CFDI SHALL RETAIN AN INDEPENDENT DISTRIBUTION CONSULTANT; AND (6)CMA AND CFDI SHALL PAY, ON A JOINT AND SEVERAL BASIS, \$70M IN DISGORGEMENT PLUS A CIVIL PENALTY OF \$70M. IN ADDITION, THE FUNDS THEN KNOWN THE COLUMBIA FUNDS VOLUNTARILY HAVE UNDERTAKEN TO OPERATE IN ACCORDANCE WITH CERTAIN GOVERNANCE POLICIES AND PRACTICES INCLUDING REQUIRING 75% OF TRUSTEES MEET INDEPENDENCE STANDARDS, THE CHAIRMAN TO BE INDEPENDENT, AND COUNSEL TO THE INDEPENDENT TRUSTEES MEET INDEPENDENCE STANDARDS.

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Reporting Source:

Firm

Affiliate:

BANKAMERICA NATIONAL TRUST CO. (FORMERLY SECURITY PACIFIC NATIONAL TRUST CO.)

Current Status:

Final

Allegations:

ALLEGATIONS INVOLVED CERTAIN SECURITIES LENDING ACTIVITIES OF BANKAMERICA NATIONAL TRUST CO. (SPNT CO.))AND RELATED ACTIVITIES.



Initiated By:	COMPTROLLER OF THE CURRENCY
Date Initiated:	04/01/1992
Docket/Case Number:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	04/01/1992
Sanctions Ordered:	Monetary/Fine \$521,823.00 Cease and Desist/Injunction
Other Sanctions Ordered:	N/A
Sanction Details:	THIS DISCLOSURE CONCERNS SPNT CO. AND RELATED ENTITIES THAT CEASED TO EXIST AFTER THEY WERE MERGED INTO BANKAMERICA CORPORATION.
Firm Statement	THIS DISCLOSURE CONCERNS SPNT CO. AND RELATED ENTITIES THAT CEASED TO EXIST AFTER THEY WERE MERGED INTO BANKAMERICA CORPORATION.

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Reporting Source:	Firm
Affiliate:	BANKAMERICA NATIONAL TRUST CO. (FORMERLY SECURITY PACIFIC NATIONAL TRUST CO.)
Current Status:	Final
Allegations:	ALLEGATIONS INVOLVED CERTAIN SECURITIES LENDING ACTIVITIES OF BANKAMERICA NATIONAL TRUST CO. (FORMERLY SECURITY PACIFIC NATIONAL TRUST CO. (SPNT CO.))AND RELATED ACTIVITIES.
Initiated By:	IRS
Date Initiated:	04/01/1992
Docket/Case Number:	
Principal Product Type:	No Product



Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	04/01/1992
Sanctions Ordered:	Monetary/Fine \$521,823.00 Cease and Desist/Injunction
Other Sanctions Ordered:	N/A
Sanction Details:	THIS DISCLOSURE CONCERNS SPNT CO. AND RELATED ENTITIES THAT CEASED TO EXIST AFTER THEY WERE MERGED INTO BANKAMERICA CORPORATION.
Firm Statement	THIS DISCLOSURE CONCERNS SPNT CO. AND RELATED ENTITIES THAT CEASED TO EXIST AFTER THEY WERE MERGED INTO BANKAMERICA CORPORATION.

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Reporting Source:	Firm
Affiliate:	BANKAMERICA NATIONAL TRUST CO. (FORMERLY SECURITY PACIFIC NATIONAL TRUST CO.)
Current Status:	Final
Allegations:	ALLEGATIONS INVOLVED CERTAIN SECURITIES LENDING ACTIVITIES OF BANKAMERICA NATIONAL TRUST CO. (FORMERLY SECURITY PACIFIC NATIONAL TRUST CO. (SPNT CO.)) AND RELATED ACTIVITIES.
Initiated By:	FEDERAL RESERVE BOARD
Date Initiated:	04/01/1992
Docket/Case Number:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)


Other Sanction(s)/Relief Sought:

Resolution:	Consent
Resolution Date:	04/01/1992
Sanctions Ordered:	Monetary/Fine \$521,823.00 Cease and Desist/Injunction
Other Sanctions Ordered:	N/A
Sanction Details:	THIS DISCLOSURE CONCERNS SPNT CO. AND RELATED ENTITIES THAT CEASED TO EXIST AFTER THEY WERE MERGED INTO BANKAMERICA CORPORATION.
Firm Statement	THIS DISCLOSURE CONCERNS SPNT CO. AND RELATED ENTITIES THAT CEASED TO EXIST AFTER THEY WERE MERGED INTO BANKAMERICA CORPORATION.

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Reporting Source:	Firm
Affiliate:	BANK OF BOSTON CORPORATION (N/K/A BANK OF AMERICA CORPORATION)
Current Status:	Final
Allegations:	THAT CERTAIN ASPECTS OF THE MANAGEMENT DISCUSSION AND ANALYSIS PORTION OF BANK OF BOSTON CORPORATION'S 10-Q FOR THE 2ND QUARTER OF 1989 DID NOT COMPLY WITH SECTION 13(A) OF THE SECURITIES EXCHANGE ACT OF 1934 (THE "EXCHANGE ACT").
Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	01/11/1994
Docket/Case Number:	ADMIN. PROCEEDING FILING NO. 3-8270
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	02/26/1994



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

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Reporting Source:	Firm
Affiliate:	CONTINENTAL BANK, N.A. (NKA BANK OF AMERICA ILLINOIS
Current Status:	Final
Allegations:	VIOLATION OF CERTAIN RECORDKEEPING REQUIREMENTS UNDER THE UNITED STATES GOVERNMENT SECURITIES ACT AND COMPTROLLER'S RULES.
Initiated By:	COMPTROLLER OF THE CURRENCY
Date Initiated:	01/01/1992
Docket/Case Number:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	01/01/1992
Sanctions Ordered:	Monetary/Fine \$20,000.00 Cease and Desist/Injunction

**Other Sanctions Ordered:****Sanction Details:**

CEASE AND DESIST ORDER AND \$100,000 FINE TO BANK OF AMERICA NT&SA; CEASE AND DESIST ORDER AND \$100,000 FINE TO CONTINENTAL BANK N.A.

Firm Statement

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

Reporting Source:

Firm

Affiliate:

BANK OF AMERICA NT & SA

Current Status:

Final

Allegations:

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

Initiated By:

COMPTROLLER OF THE CURRENCY

Date Initiated:

01/01/1992

Docket/Case Number:**Principal Product Type:**

No Product

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

Cease and Desist

Other Sanction(s)/Relief Sought:**Resolution:**

Settled

Resolution Date:

01/01/1992



Sanctions Ordered:	Monetary/Fine \$20,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	CEASE AND DESIST ORDER AND \$100,000 FINE TO BANK OF AMERICA NT&SA; CEASE AND DESIST ORDER AND \$100,000 FINE TO CONTINENTAL BANK N.A.
Firm Statement	IN JANUARY 1992, AS PART OF AN INDUSTRY-WIDE RESOLUTION OF AN INVESTIGATION OF CERTAIN MARKET PRACTICES FOR THE UNITED STATES GOVERNMENT SPONSORED ENTERPRISE SECURITIES, THE COMPTROLLER ISSUED CEASE AND DESIST ORDER TO BOFA, CBNA AND APPROXIMATELY 100 OTHER SECURITIES DEALERS (INCLUDING OTHER BANKS) REQUIRING THESE ENTITIES TO CEASE AND DESIST FROM FURTHER VIOLATIONS OF CERTAIN RECORD-KEEPING REQUIREMENTS UNDER THE UNITED STATES GOVERNMENT SECURITIES ACT AND THE COMPTROLLER'S RULES AND TO PAY CIVIL MONEY PENALTIES. WITHOUT ADMITTING OR DENYING, THE COMPTROLLER'S FINDINGS, BOFA AGREED TO PAY A FINE IN THE AMOUNT OF \$100,000. CBNA, WHICH BECAME A WHOLLY OWNED SUBSIDIARY OF BANKAMERICA CORPORATION IN SEPTEMBER 1994, AGREED TO PAY A FINE IN THE AMOUNT OF \$100,000.

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	ON MAY 29, 2015, THE COMPTROLLER OF THE CURRENCY ("OCC") ISSUED AN ORDER TO CEASE AND DESIST AND ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY (TOGETHER, THE "ORDERS") AGAINST BANK OF AMERICA, N.A. ("BANA") RELATING TO THE SERVICEMEMBERS CIVIL RELIEF ACT ("SCRA") AND BANA'S SWORN DOCUMENT AND COLLECTIONS LITIGATION PRACTICES. IN THE ORDERS, THE OCC IDENTIFIED (I) UNSAFE OR UNSOUND PRACTICES IN CONNECTION WITH BANA'S EFFORTS TO COMPLY WITH THE SCRA, (II) SCRA VIOLATIONS, AND (III) UNSAFE OR UNSOUND PRACTICES IN CONNECTION WITH BANA'S SWORN DOCUMENT AND COLLECTIONS LITIGATION PRACTICES. REGARDING THE SCRA, THE ORDERS STATED BANA FAILED TO HAVE EFFECTIVE POLICIES AND PROCEDURES TO ENSURE COMPLIANCE WITH SCRA; FAILED TO DEVOTE SUFFICIENT FINANCIAL, STAFFING, AND MANAGERIAL RESOURCES TO ENSURE PROPER ADMINISTRATION OF ITS SCRA COMPLIANCE PROCESSES; FAILED TO DEVOTE TO ITS SCRA COMPLIANCE PROCESSES ADEQUATE INTERNAL CONTROLS, COMPLIANCE RISK MANAGEMENT,



INTERNAL AUDIT, THIRD PARTY MANAGEMENT, AND TRAINING; AND ENGAGED IN VIOLATIONS OF THE SCRA. REGARDING THE SWORN DOCUMENT AND COLLECTIONS LITIGATION PROCESS, THE ORDERS STATED THAT BANA FILED OR CAUSED TO BE FILED IN COURTS AFFIDAVITS EXECUTED BY ITS EMPLOYEES OR EMPLOYEES OF THIRD PARTY SERVICE PROVIDERS MAKING ASSERTIONS THAT, IN MANY CASES, WERE NOT BASED ON PERSONAL KNOWLEDGE OR REVIEW OF RELEVANT BOOKS AND RECORDS; FILED OF CAUSED TO BE FILED IN COURT AFFIDAVITS WHEN BANA DID NOT FOLLOW PROPER NOTARY PROCEDURES; FAILED TO DEVOTE SUFFICIENT FINANCIAL, STAFFING, AND MANAGERIAL RESOURCES TO ENSURE PROPER ADMINISTRATION OF ITS SWORN DOCUMENT AND COLLECTIONS LITIGATION PROCESSES; AND FAILED TO SUFFICIENTLY OVERSEE OUTSIDE COUNSEL AND OTHER THIRD-PARTY PROVIDERS HANDLING SWORN DOCUMENT AND COLLECTIONS LITIGATION SERVICES.

Initiated By:	COMPTROLLER OF THE CURRENCY
Date Initiated:	05/29/2015
Docket/Case Number:	AA-EC-2015-1 AND AA-EC-2015-2
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:	REMEDIAL ACTIONS, CEASE AND DESIST
Resolution:	Settled
Resolution Date:	05/29/2015
Sanctions Ordered:	Monetary/Fine \$30,000,000.00
Other Sanctions Ordered:	REMEDIAL ACTIONS
Sanction Details:	IN THE ORDERS, BANA AGREED TO PAY A CIVIL MONEY PENALTY IN THE TOTAL AMOUNT OF \$30 MILLION, HAS BEGUN CORRECTIVE ACTION, AND IS COMMITTED TO TAKING ALL NECESSARY AND APPROPRIATE STEPS TO REMEDY THE DEFICIENCIES, UNSAFE OR UNSOUND PRACTICES, AND VIOLATIONS OF LAW IDENTIFIED BY THE OCC, AND TO ENHANCE ITS SCRA COMPLIANCE PRACTICES AND SWORN DOCUMENT AND COLLECTIONS LITIGATION PRACTICES. SPECIFICALLY, BANA AGREED TO: (A) APPOINTMENT AND MAINTAIN A COMPLIANCE COMMITTEE TO MONITOR AND OVERSEE BANA'S COMPLIANCE WITH THE ORDERS AND TO APPROVE MEASURES TO ENSURE COMPLIANCE; (B) SUBMIT AN ACCEPTABLE PLAN



CONTAINING A COMPLETE DESCRIPTION OF THE ACTIONS TO ACHIEVE COMPLIANCE WITH THE ORDERS; (C) SUBMIT A WRITTEN PLAN TO EFFECTIVELY IMPLEMENT AN ENTERPRISE-WIDE COMPLIANCE RISK MANAGEMENT PROGRAM REGARDING COMPLIANCE WITH ALL APPLICABLE LAWS, REGULATIONS, AND REGULATORY GUIDANCE; (D) CONDUCT A WRITTEN, COMPREHENSIVE ASSESSMENT OF ITS RISK IN SCRA COMPLIANCE OPERATIONS, INCLUDING BUT NOT LIMITED TO, OPERATIONAL, COMPLIANCE, LEGAL, AND REPUTATIONAL RISKS; (E) SUBMIT ACCEPTABLE WRITTEN PLANS TO ENSURE ITS COMPLIANCE WITH THE SCRA AND WITH REGARD TO COLLECTIONS LITIGATION; [CONTINUED IN 13. BELOW]

Firm Statement

[CONTINUED FROM 12.C. ABOVE] (F) SUBMIT PLANS TO CONDUCT A SCRA REVIEW AND A COLLECTIONS LITIGATION REVIEW OF ACCOUNTS, SCRA AND COLLECTIONS LITIGATION REMEDIATION, AND SCRA INTERNAL AUDIT; (G) SUBMIT POLICIES AND PROCEDURES FOR SCRA THIRD PARTY MANAGEMENT AND IMPROVEMENTS TO ITS MANAGEMENT INFORMATION SYSTEMS FOR SCRA COMPLIANCE ACTIVITIES, AND TO PROVIDE CERTAIN REPORTS TO THE COMPLIANCE COMMITTEE; (H) SUBMIT WRITTEN PLANS, PROGRAMS, POLICIES, AND PROCEDURES REQUIRED BY THE ORDERS; AND (I) SUBMIT A WRITTEN PROGRESS REPORT DEALING THE FORM AND MANNER OF ALL ACTIONS TAKEN TO SECURE COMPLIANCE WITH THE PROVISION OF THE ORDERS AND THE RESULTS THEREOF.

IN SETTLEMENT OF THIS MATTER, BANA CONSENTED AND AGREED TO THE ISSUANCE OF THE ORDERS, WHICH THE OCC HAS DETERMINED TO ACCEPT AND HAS ISSUED. BANA NEITHER ADMITS NOT DENIES THE FINDINGS IN THE ORDERS. THE ALLEGATIONS, DISPOSITIONS, FINDINGS AND SANCTIONS OF THE ORDERS ARE DESCRIBED ABOVE IN ITEMS 7 AND 12.

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Reporting Source: Firm

Affiliate: BANK OF AMERICA, NATIONAL ASSOCIATION

Current Status: Final

Allegations: ON APRIL 13, 2011, THE COMPTROLLER OF THE CURRENCY OF THE UNITED STATES OF AMERICA ("OCC") ISSUED A CEASE AND DESIST CONSENT ORDER ("ORDER") AGAINST BANK OF AMERICA, NATIONAL ASSOCIATION ("BANA"). THE ORDER IDENTIFIED CERTAIN DEFICIENCIES AND UNSAFE OR UNSOUND PRACTICES IN RESIDENTIAL MORTGAGE SERVICING AND IN BANA'S INITIATION AND HANDLING OF FORECLOSURE PROCEEDINGS. THE ORDER FINDS THAT IN CONNECTION WITH CERTAIN FORECLOSURES OF LOANS IN IT IS RESIDENTIAL SERVICING PORTFOLIO,



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

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



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

Firm Statement

BANA SUBMITTED AN OFFER OF SETTLEMENT TO THE OCC. IN THE OFFER OF SETTLEMENT, BANA AGREED TO CONSENT TO THE ENTRY OF THE ORDER, WITHOUT ADMITTING OR DENYING ANY WRONGDOING. THE ORDER WAS ISSUED ON APRIL 13, 2011, AND MADE THE FINDINGS OF VIOLATIONS DESCRIBED ABOVE IT ITEM 7. THE SANCTIONS IMPOSED ARE EXPLAINED ABOVE IN ITEM 12.C. ON FEBRUARY 27, 2012, BANA ENTERED INTO AN AGREEMENT WITH THE OCC, WITHOUT ADMITTING OR DENYING ANY WRONGDOING, TO FORGO THE ASSESSMENT OF CIVIL MONEY PENALTIES AND TO RELEASE FROM CERTAIN CLAIMS IN THE ORDER SO LONG AS BANA: (A)PROVIDES BORROWERS ASSISTANCE AND CERTAIN PAYMENTS PURSUANT TO A SETTLEMENT AGREEMENT WITH THE UNITED STATES OF AMERICA, ACTING THROUGH THE UNITED STATES DEPARTMENT OF JUSTICE AND WITH THE ATTORNEYS GENERAL OF VARIOUS STATES, TO SETTLE CERTAIN POTENTIAL STATE AND FEDERAL CLAIMS RELATING TO BANA'S RESIDENTIAL MORTGAGE ORIGINATION, SERVICING AND FORECLOSURE PRACTICES; (B)PROVIDES DETAILED REPORTS AND ACCOUNTING FOR THE PAYMENTS DESCRIBED ABOVE; AND (C)SHALL MAKE AVAILABLE CERTAIN DOCUMENTS ASSOCIATED WITH THE PAYMENTS ABOVE UPON THE REQUEST OF THE OCC. ON JUNE 17, 2015, THE OCC TERMINATED THIS ORDER AGAINST BANA BECAUSE THE OCC DETERMINED THAT THE PROTECTION OF THE DEPOSITORS, OTHER CUSTOMERS, AND SHAREHOLDERS OF BANA, AS WELL AS ITS SAFE AND SOUND OPERATION, DOES NOT REQUIRE THE CONTINUED EXISTENCE OF THE ORDER ISSUED IN APRIL, 2011 AND BANA HAS SATISFIED ALL OF THE REQUIREMENTS OF AN AMENDMENT TO THE ORDER ISSUED IN FEBRUARY, 2013.

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Reporting Source:

Firm

Affiliate:

BANK OF AMERICA, N.A.



Current Status:	Final
Allegations:	ON JUNE 29, 2015, THE COMPTROLLER OF THE CURRENCY ("OCC") ISSUED A CONSENT ORDER AND A CONSENT ORDER FOR A CIVIL MONEY PENALTY (TOGETHER, THE "ORDERS") AGAINST BANK OF AMERICA, N.A. ("BANA") RELATING TO THE BANA'S PRACTICES THAT RESULTED IN A VIOLATIONS OF THE NATIONAL FLOOD INSURANCE ACT OF 1968, AS AMENDED, AND THE FLOOD DISASTER PROTECTION ACT OF 1973, AS AMENDED (COLLECTIVELY, "FDPA") 42 U.S.C. § 4001, ET SEQ., AND THEIR IMPLEMENTING REGULATIONS. SPECIFICALLY, THE OCC FOUND THAT, SINCE AT LEAST 2011, BANA VIOLATED 42 § U.S.C. 4012A(E) (PLACEMENT OF FLOOD INSURANCE BY LENDER) AND 12 C.F.R. §§ 22.3 (REQUIREMENT TO PURCHASE FLOOD INSURANCE WHERE AVAILABLE) AND 22.9 (NOTICE OF SPECIAL FLOOD HAZARDS AND AVAILABILITY OF FEDERAL DISASTER RELIEF ASSISTANCE) IN MAKING, INCREASING, EXTENDING, RENEWING, AND/OR SERVICING "DESIGNATED LOANS" (LOANS SECURED BY BUILDINGS OR MOBILE HOMES LOCATED IN SPECIAL FLOOD HAZARD AREAS IN WHICH FLOOD INSURANCE IS AVAILABLE UNDER THE NATIONAL FLOOD INSURANCE ACT OF 1968). THE OCC FOUND THAT THESE VIOLATIONS RESULTED FROM DEFICIENT POLICIES, PROCEDURES, AND PROCESSES AND AN INEFFECTIVE FDPA COMPLIANCE PROGRAM.
Initiated By:	COMPTROLLER OF THE CURRENCY
Date Initiated:	06/29/2015
Docket/Case Number:	AA-EC-2015-15 AND AA-EC-2015-19
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:	CEASE AND DESIST REMEDIAL ACTIONS
Resolution:	Settled
Resolution Date:	06/29/2015
Sanctions Ordered:	Monetary/Fine \$1,104,530.00 Cease and Desist/Injunction
Other Sanctions Ordered:	REMEDIAL ACTIONS
Sanction Details:	IN THE ORDERS, BANA AGREED TO PAY A CIVIL MONEY PENALTY IN THE TOTAL AMOUNT OF \$1,104,530.00, WHICH WAS PAID ON JULY 1, 2015, AND HAS AGREED TO CERTAIN REMEDIAL ACTIONS. SPECIFICALLY, BANA



AGREED TO: (A)APPOINT AND MAINTAIN A COMPLIANCE COMMITTEE TO MONITOR AND OVERSEE BANA'S COMPLIANCE WITH THE ORDERS AND TO APPROVE MEASURES TO ENSURE COMPLIANCE; (B)SUBMIT AN ACCEPTABLE PLAN CONTAINING A COMPLETE DESCRIPTION OF THE ACTIONS TO ACHIEVE COMPLIANCE WITH THE ORDERS; (C)SUBMIT A WRITTEN PLAN TO EFFECTIVELY IMPLEMENT AN ENTERPRISE-WIDE PROGRAM TO ENSURE BANA'S COMPLIANCE WITH THE FDPA, ITS IMPLEMENTING REGULATIONS, AND FDPA-RELATED REGULATORY GUIDANCE; (D)SUBMIT POLICIES AND PROCEDURES FOR OUTSTANDING FDPA COMPLIANCE FUNCTIONS TO ANY AGENT, INDEPENDENT CONTRACTOR, CONSULTING FIRM, LAW FIRM, OR OTHER THIRD-PARTY (INCLUDING ANY AFFILIATE OF BANA); (E)DEVELOP A COMPREHENSIVE WRITTEN FDPA COMPLIANCE AUDIT PROGRAM; AND (F)SUBMIT THE WRITTEN PLANS, PROGRAM, POLICIES, AND PROCEDURES REQUIRED BY THE ORDERS FOR REVIEW AND DETERMINATION OF NO SUPERVISORY OBJECT WITHIN A SPECIFIC TIME.

Firm Statement

IN SETTLEMENT OF THIS MATTER, BANA CONSENTED AND AGREED TO THE ISSUANCE OF THE ORDERS, WHICH THE OCC HAS DETERMINED TO ACCEPT AND HAS ISSUED. BANA NEITHER ADMITS NOR DENIES THE FINDINGS IN THE ORDERS. THE ALLEGATIONS, DISPOSITIONS, FINDINGS AND SANCTIONS OF THE ORDERS ARE DESCRIBED ABOVE IN ITEMS 7 AND 12.

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Reporting Source:

Firm

Affiliate:

BANK OF AMERICA, NATIONAL ASSOCIATION

Current Status:

Final

Allegations:

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



Initiated By: THE OFFICE OF THE COMPTROLLER OF THE CURRENCY

Date Initiated: 12/07/2010

Docket/Case Number: #2010-239

Principal Product Type: Derivative(s)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Restitution

Other Sanction(s)/Relief Sought: UNDERTAKING

Resolution: Settled

Resolution Date: 12/07/2010

Sanctions Ordered: Disgorgement/Restitution

Other Sanctions Ordered: PAYMENT OF UNJUST ENRICHMENT IN THE AMOUNT OF \$9,217,218 AND UNDERTAKING

Sanction Details: THE BANK HAS ENTERED INTO A WRITTEN AGREEMENT ON DECEMBER 7, 2010, WITH THE COMPTROLLER OF THE CURRENCY. UNDER THE TERMS OF THE WRITTEN AGREEMENT, THE BANK AGREED TO INSTITUTE AND/OR CONTINUE CERTAIN POLICIES AND PROCEDURES, INCLUDING COMPLIANCE, TRAINING AND AUDIT PROGRAMS, RELATING TO COMPETITIVELY BID TRANSACTIONS FOR THE SALE OF DERIVATIVE FINANCIAL PRODUCTS TO MUNICIPALITIES AND NON-PROFIT ORGANIZATIONS THAT ARE INTENDED TO INVEST OR RE-INVEST THE PROCEEDS OF BONDS ISSUED BY THESE ORGANIZATIONS OR TO MANAGE OR TRANSFER THE INTEREST RATES OF BONDS ISSUED BY THE ORGANIZATIONS. IN ADDITION, THE BANK AGREED TO DO A FORMAL ASSESSMENT OF ALL BUSINESS LINES THAT ENGAGED IN CERTAIN TYPES OF COMPETITIVELY BID TRANSACTIONS, TO COMPLETE A FORMAL EVALUATION OF THE OPERATIONAL POLICIES AND PROCEDURES APPLICABLE TO SUCH BUSINESSES TO ENSURE THAT ADEQUATE POLICIES AND PROCEDURES EXIST TO ENSURE COMPLIANCE WITH SAFE AND SOUND BANKING PRACTICES, LAW, AND REGULATIONS RELATED TO THE COMPETITIVELY BID TRANSACTIONS, AND TO DEVELOP AN INTERNAL TRAINING PROGRAM TO ENSURE COMPLIANCE WITH ALL LAWS AND REGULATIONS RELATED TO COMPETITIVELY BID TRANSACTIONS. UPON APPROVAL BY THE COMPTROLLER, THE BANK MUST IMMEDIATELY BEGIN TO IMPLEMENT THE POLICIES, PROCEDURES AND PROGRAMS CALLED FOR BY THE AGREEMENT. FINALLY, THE BANK AGREED TO PAY UNJUST ENRICHMENT IN THE AMOUNT OF \$9,217,218 TO CERTAIN COUNTERPARTS IDENTIFIED BY THE COMPTROLLER.



Firm Statement

THE BANK HAS ENTERED INTO A WRITTEN AGREEMENT ON DECEMBER 7, 2010, WITH THE COMPTROLLER OF THE CURRENCY. UNDER THE TERMS OF THE WRITTEN AGREEMENT, THE BANK AGREED TO INSTITUTE AND/OR CONTINUE CERTAIN POLICIES AND PROCEDURES, INCLUDING COMPLIANCE, TRAINING AND AUDIT PROGRAMS, RELATING TO COMPETITIVELY BID TRANSACTIONS FOR THE SALE OF DERIVATIVE FINANCIAL PRODUCTS TO MUNICIPALITIES AND NON-PROFIT ORGANIZATIONS THAT ARE INTENDED TO INVEST OR RE-INVEST THE PROCEEDS OF BONDS ISSUED BY THESE ORGANIZATIONS OR TO MANAGE OR TRANSFER THE INTEREST RATES OF BONDS ISSUED BY THE ORGANIZATIONS. IN ADDITION, THE BANK AGREED TO DO A FORMAL ASSESSMENT OF ALL BUSINESS LINES THAT ENGAGED IN CERTAIN TYPES OF COMPETITIVELY BID TRANSACTIONS, TO COMPLETE A FORMAL EVALUATION OF THE OPERATIONAL POLICIES AND PROCEDURES APPLICABLE TO SUCH BUSINESSES TO ENSURE THAT ADEQUATE POLICIES AND PROCEDURES EXIST TO ENSURE COMPLIANCE WITH SAFE AND SOUND BANKING PRACTICES, LAW, AND REGULATIONS RELATED TO THE COMPETITIVELY BID TRANSACTIONS, AND TO DEVELOP AN INTERNAL TRAINING PROGRAM TO ENSURE COMPLIANCE WITH ALL LAWS AND REGULATIONS RELATED TO COMPETITIVELY BID TRANSACTIONS. UPON APPROVAL BY THE COMPTROLLER, THE BANK MUST IMMEDIATELY BEGIN TO IMPLEMENT THE POLICIES, PROCEDURES AND PROGRAMS CALLED FOR BY THE AGREEMENT. FINALLY, THE BANK AGREED TO PAY UNJUST ENRICHMENT IN THE AMOUNT OF \$9,217,218 TO CERTAIN COUNTERPARTIES IDENTIFIED BY THE COMPTROLLER.

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	ON NOVEMBER 11, 2014, THE OFFICE OF THE COMPTROLLER OF THE CURRENCY OF THE UNITED STATES OF AMERICA ("OCC") ISSUED A CONSENT ORDER AND A CONSENT ORDER FOR THE ASSESSMENT OF A CIVIL MONEY PENALTY AGAINST BANK OF AMERICA, N.A. ("BANK OF AMERICA") RELATED TO ITS FOREIGN EXCHANGE (FX) BUSINESS ("ORDERS") FROM 2008 THROUGH 2013. THE OCC FOUND, AND BANK OF AMERICA NEITHER ADMITTED NOR DENIED, THAT BANK OF AMERICA HAD DEFICIENCIES IN ITS INTERNAL CONTROLS AND HAD ENGAGED IN UNSAFE OR UNSOUND BANKING PRACTICES WITH RESPECT TO THE OVERSIGHT AND GOVERNANCE OF BANK OF AMERICA'S FX TRADING SUCH THAT THE BANK FAILED TO DETECT AND PREVENT CERTAIN CONDUCT. SPECIFICALLY, THE OCC FOUND THAT: A)BANK OF AMERICA'S



COMPLIANCE RISK ASSESSMENT LACKED SUFFICIENT GRANULARITY AND FAILED TO IDENTIFY THE RISKS RELATED TO SALES, TRADING AND SUPERVISORY EMPLOYEES IN THAT BUSINESS ("EMPLOYEE"); B)BANK OF AMERICA'S TRANSACTION MONITORING AND COMMUNICATIONS SURVEILLANCE LACKED AN ADEQUATE ANALYSIS OF RISK-BEHAVIOR RELATED TO EMPLOYEE MARKET CONDUCT IN ITS WHOLESALE FOREIGN EXCHANGE BUSINESS WHERE IT IS ACTING PRINCIPAL ("FX TRADING"); C)BANK OF AMERICA'S COMPLIANCE TESTING PROCEDURES WERE INADEQUATE TO MEASURE ADHERENCE TO ITS STANDARDS OF EMPLOYEE CONDUCT AND FIRM POLICIES APPLICABLE TO EMPLOYEE MARKET CONDUCT IN FX TRADING; AND D)BANK OF AMERICA'S RISK ASSESSMENT AND COVERAGE OF THE FX TRADING BUSINESS NEEDED IMPROVEMENT TO IDENTIFY AND MITIGATE COMPLIANCE RISKS RELATED TO EMPLOYEE MARKET CONDUCT; E)BANK OF AMERICA'S CUSTOMER INFORMATION CONTROLS WERE INADEQUATE REGARDING THE WM/REUTERS ORDER BOOK TO PREVENT THE MISUSE OF CUSTOMER INFORMATION; F)BANK OF AMERICA'S RISK AND PROFITABILITY REPORTING WAS INADEQUATE TO IDENTIFY POTENTIAL EMPLOYEE MARKET MISCONDUCT IN FX TRADING; AND G)BANK OF AMERICA'S FX BUSINESS SUPERVISION ROUTINES WERE INADEQUATE BECAUSE THEY CREATED "GAPS" IN THE EMPLOYEE MARKET CONDUCT SUPERVISORY FRAMEWORK.

Initiated By: THE COMPTROLLER OF THE CURRENCY OF THE UNITED STATES OF AMERICA

Date Initiated: 11/11/2014

Docket/Case Number: AA-EC-14-99

Principal Product Type: Other

Other Product Type(s): FOREIGN EXCHANGE

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

Other Sanction(s)/Relief Sought: REMEDIAL SANCTIONS

Resolution: Settled

Resolution Date: 11/11/2014

Sanctions Ordered: Monetary/Fine \$250,000,000.00

Other Sanctions Ordered: REMEDIAL ACTIONS

Sanction Details: THE SETTLEMENT RESULTED IN THE OCC ISSUING THE ORDERS FINDING THAT BANK OF AMERICA HAD DEFICIENCIES IN ITS CONTROLS AND HAD



ENGAGED IN UNSAFE OR UNSOUND BANKING PRACTICES WITH RESPECT TO THE OVERSIGHT AND GOVERNANCE OF BANK OF AMERICA'S FX TRADING BUSINESS SUCH THAT THE BANK FAILED TO DETECT AND PREVENT CERTAIN CONDUCT. BANK OF AMERICA NEITHER ADMITTED NOR DENIED THE FINDINGS. IN THE ORDERS, BANK OF AMERICA AGREED TO MAKE A PAYMENT OF A CIVIL MONEY PENALTY IN THE TOTAL AMOUNT OF \$250 MILLION. THE PAYMENT WAS MADE ON NOVEMBER 17, 2014. ALSO, BANK OF AMERICA COMMITTED (AND HAD ALREADY BEGUN) TAKING ALL NECESSARY AND APPROPRIATE STEPS TO REMEDY THE DEFICIENCIES AND UNSAFE OR UNSOUND PRACTICES IDENTIFIED BY THE OCC AND HAS BEGUN IMPLEMENTING PROCEDURES TO REMEDIATE THE PRACTICES ADDRESSED IN THE ORDERS. SPECIFICALLY, BANK OF AMERICA AGREE TO: A) MAINTAIN A BOARD COMPLIANCE COMMITTEE RESPONSIBLE FOR MONITORING AND COORDINATING BANK OF AMERICA'S COMPLIANCE WITH THE PROVISIONS IN THE ORDERS; B) SUBMIT TO THE OCC AN ACTION PLAN DESCRIBING THE ACTIONS THAT ARE NECESSARY AND APPROPRIATE TO ACHIEVE COMPLIANCE WITH CERTAIN ASPECTS OF THE ORDERS; C) SUBMIT AN ACCEPTABLE OVERSIGHT AND GOVERNANCE WRITTEN PLAN TO PROVIDE FOR CERTAIN MANAGEMENT OVERSIGHT AND GOVERNANCE RELATING TO EMPLOYEE MARKET CONDUCT IN FX TRADING; D) SUBMIT AN ACCEPTABLE COMPLIANCE RISK ASSESSMENT WRITTEN PLAN TO PROVIDE FOR A COMPLIANCE RISK ASSESSMENT SUFFICIENTLY GRANULAR TO IDENTIFY RISKS RELATED TO EMPLOYEE MARKET CONDUCT IN FX TRADING; E) SUBMIT AN ACCEPTABLE MONITORING AND SURVEILLANCE WRITTEN PLAN TO PROVIDE FOR APPROPRIATE MONITORING AND COMMUNICATIONS SURVEILLANCE RELATED TO EMPLOYEE MARKET CONDUCT IN FX TRADING; F) SUBMIT AN ACCEPTABLE COMPLIANCE TESTING WRITTEN PLAN TO PROVIDE FOR APPROPRIATE COMPLIANCE TESTING RELATED TO EMPLOYEE MARKET CONDUCT IN FX TRADING; G) SUBMIT AN ACCEPTABLE INTERNAL AUDIT WRITTEN PLAN FOR THE INTERNAL AUDIT PROGRAM TO ADEQUATELY ADDRESS EMPLOYEE MARKET CONDUCT IN FX TRADING

Firm Statement

IN SETTLEMENT OF THIS MATTER, BANK OF AMERICA CONSENTED AND AGREED TO ISSUANCE OF THE ORDERS, WHICH THE OCC HAS DETERMINED TO ACCEPT AND HAS ISSUED. THE ALLEGATIONS, DISPOSITIONS, FINDINGS AND SANCTIONS OF THE ORDERS ARE DESCRIBED ABOVE IN ITEMS 7 AND 12

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final



Allegations:	THE MAS TOOK ADMINISTRATIVE ACTION AGAINST BANK OF AMERICA, NATIONAL ASSOCIATION (SINGAPORE BRANCH) ("BANA SINGAPORE") AND EIGHTEEN OTHER BANKS IN THE MARKET FOR DEFICIENCIES IN GOVERNANCE, RISK MANAGEMENT, INTERNAL CONTROLS, AND SURVEILLANCE SYSTEMS FROM 2007 TO 2011 RELATED TO THE SUBMISSION PROCESSES FOR SINGAPORE DOLLAR INTEREST RATE BENCHMARKS - SPECIFICALLY, SOBOR AND SOR - AND FOREIGN EXCHANGE SPOT BENCHMARKS IN FOUR EMERGING MARKET ASIAN CURRENCIES. IN ADDITION, THE MAS DETERMINED BANA SINGAPORE PERSONNEL ENGAGED IN ELECTRONIC COMMUNICATIONS IN WHICH THEY INITIATED, RECEIVED, ACKNOWLEDGED, OR RELAYED REQUESTS TO IMPROPERLY INFLUENCE SUBMISSIONS FOR CERTAIN OF THE ABOVE-REFERENCED ABS BENCHMARKS. THE MAS STATED IT HAD NOT MADE THE FINDING THAT THE ABS BENCHMARKS HAD BEEN MANIPULATED BY ANY OF THE NINETEEN BANKS SUBJECT TO ITS ORDER, BUT FOUND THAT THE ACTION OF THE BANA SINGAPORE (AND OTHER BANKS) PERSONNEL REFLECTED A LACK OF PROFESSIONAL CONDUCT AND INTEGRITY.
Initiated By:	MONETARY AUTHORITY OF SINGAPORE ("MAS")
Date Initiated:	07/16/2012
Docket/Case Number:	N/A
Principal Product Type:	Other
Other Product Type(s):	REFERENCE RATE SUBMISSIONS FOR SIBOR, SOR, AND FOREIGN EXCHANGE BENCHMARK RATES FOR NON-DELIVERABLE FORWARDS CONTRACTS FOR MALAYSIAN RINGGIT, INDONESIAN RUPIAH, VIETNAMESE DONG, AND THAI BAHT ADMINISTERED BY THE ASSOCIATION OF BANKS IN SINGAPORE ("ABS BENCHMARKS")
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	ADOPT CERTAIN MEASURES TO ADDRESS DEFICIENCIES, REPORT PROGRESS ON QUARTERLY BASIS, CONDUCT INDEPENDENT REVIEWS, AND INCREASE STATUTORY RESERVES.
Resolution:	Stipulation and Consent
Resolution Date:	06/14/2013
Sanctions Ordered:	Censure
Other Sanctions Ordered:	THE MAS IS REQUIRING BANA SINGAPORE TO ADOPT MEASURES TO ADDRESS THE DEFICIENCIES, REPORT ITS PROGRESS IN ADDRESSING THESE DEFICIENCIES ON A QUARTERLY BASIS, AND CONDUCT INDEPENDENT REVIEWS TO ENSURE THE ROBUSTNESS OF THE REMEDIAL MEASURES. BANA SINGAPORE WAS NOT FINED, BUT INSTEAD



WAS REQUIRED TO POST WITH THE MAS FOR ONE YEAR A STATUTORY RESERVE OF 700 MILLION SINGAPORE DOLLARS (APPROXIMATELY US\$551 MILLION) WHICH IS REFUNDABLE UPON SATISFACTION OF THE MAS'S ORDER ON REMEDIAL MEASURES.

Sanction Details:

PURSUANT TO SECTION 49(2) OF THE SINGAPORE BANKING ACT, THE MAS REQUIRED BANA SINGAPORE TO POST THE ABOVE-REFERENCED STATUTORY RESERVE OF 700 MILLION SINGAPORE DOLLARS (APPROXIMATELY US\$551 MILLION). IN ADDITION, THE MAS REQUIRED BANA SINGAPORE TO MEET CERTAIN MILESTONES OVER THE NEXT YEAR TO ADOPT MEASURES TO ADDRESS THE DEFICIENCIES, REPORT THEIR PROGRESS IN ADDRESSING THESE DEFICIENCIES ON A QUARTERLY BASIS, AND CONDUCT INDEPENDENT REVIEWS TO ENSURE THE ROBUSTNESS OF THE REMEDIAL MEASURES.

Firm Statement

ON JUNE 13, 2013, THE MAS SENT BANA SINGAPORE A LETTER SETTING FORTH: (I) CERTAIN CONCLUSIONS REGARDING THE DEFICIENCIES THE AMS IDENTIFIED IN THE REVIEW REPORTS AND RELATED DOCUMENTATION BANA SINGAPORE HAD SUBMITTED TO THE MAS REGARDING THE ABS REFERENCE RATES (II) DIRECTING BANA SINGAPORE, PURSUANT TO SECTION 49(2) OF THE SINGAPORE BANKING ACT, TO TAKE CERTAIN MEASURE TO ADDRESS GOVERNANCE AND CONTROL DEFICIENCIES; AND (III) DIRECTING BANA SINGAPORE, PURSUANT TO SECTION 38(1) OF THE SINGAPORE BANKING ACT, TO MAINTAIN AN ADDITION STATUTORY RESERVE OF 700 MILLION SINGAPORE DOLLARS (APPROXIMATELY US\$551 MILLION) WITH THE MAS FOR A PERIOD OF ONE YEAR. ON JUNE 14, 2014, THE MAS MADE A PUBLIC ANNOUNCEMENT REGARDING THE CONCLUSION OF ITS INQUIRY INTO THE ABS BENCHMARKS AND PROVIDED MARKET-WIDE FINDINGS WITH RESPECT TO COMMUNICATIONS DEEMED TO DEMONSTRATE A LACK OF PROFESSIONAL CONDUCT AND INTEGRITY.

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, N.A.
Current Status:	Final
Allegations:	ALLEGATIONS THAT BANK OF AMERICA, N.A., BY VIRTUE OF REGULATIONS 9B.07, EXECUTED TRADES INVOLVING PRE-EXECUTION COMMUNICATIONS WHICH WERE NOT ENTERED IN ACCORDANCE WITH PRESCRIBED TIME REQUIREMENTS AND PROCEDURES, IN VIOLATION OF REGULATION 9B.16.
Initiated By:	CHICAGO BOARD OF TRADE, INC.
Date Initiated:	08/25/2004



Docket/Case Number: 2004-INV-12B

Principal Product Type: Other

Other Product Type(s): TREASURY OPTIONS

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: FINE

Resolution: Settled

Resolution Date: 09/27/2004

Sanctions Ordered: Monetary/Fine \$20,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING ANY VIOLATION OF REGULATION 9B.16, BANK OF AMERICA, N.A. AGREED TO PAY A FINE OF \$20,000.00

Firm Statement WITHOUT ADMITTING OR DENYING ANY VIOLATION OF REGULATION 9B.16, BANK OF AMERICA, N.A. AGREED TO PAY A FINE OF \$20,000.00

Disclosure 159 of 170

Reporting Source: Firm

Affiliate: BANK OF AMERICA, NATIONAL ASSOCIATION

Current Status: Final

Allegations: ON APRIL 7, 2014, THE COMPTROLLER OF THE CURRENCY OF THE UNITED STATES OF AMERICA ("OCC") ISSUED A CONSENT ORDER AGAINST BANK OF AMERICA, NATIONAL ASSOCIATION AND FIA CARD SERVICES, NATIONAL ASSOCIATION. THE ORDER IDENTIFIED DEFICIENCIES IN CONNECTION WITH FULFILLMENT OF CUSTOMER PROCESSING CONCERNING THE PROVISION OF IDENTITY THEFT PROTECTION PRODUCTS AS WELL AS VENDOR AND RISK MANAGEMENT PROTOCOLS CONCERNING SO-CALLED "ADD-ON" PRODUCTS.

Initiated By: THE OFFICE OF THE COMPTROLLER OF THE CURRENCY

Date Initiated: 04/07/2014

Docket/Case Number: AA-EC-2014-6

Principal Product Type: Other

Other Product Type(s): IDENTITY PROTECTION PRODUCTS



Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION UNDERTAKING
Resolution:	Order
Resolution Date:	04/07/2014
Sanctions Ordered:	Monetary/Fine \$25,000,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, BANK OF AMERICA, NATIONAL ASSOCIATION AND FIA CARD SERVICES, NATIONAL ASSOCIATION CONSENTED TO A CIVIL MONETARY PENALTY OF \$25,000,000. FURTHER, THE CONSENT ORDER REQUIRES A RESTITUTION PLAN TO BE SUBMITTED TO THE OCC AND, FOLLOWING APPROVAL, THE PROVISION OF RESTITUTION TO BORROWERS. IN ADDITION, THE CONSENT ORDER REQUIRES THE SUBMISSION OF ENHANCED VENDOR MANAGEMENT POLICIES; ENHANCED RISK MANAGEMENT POLICIES AND PROCEDURES; AND ENHANCED INTERNAL AUDIT REVIEWS OF ADD-ON PRODUCTS TO ASSESS UNFAIR, DECEPTIVE, OR ABUSIVE ACTS OR PRACTICES ("UDAAP") RISK.
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Reporting Source:	Firm
Affiliate:	FIA CARD SERVICES, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	ON APRIL 7, 2014, THE COMPTROLLER OF THE CURRENCY OF THE UNITED STATES OF AMERICA ("OCC") ISSUED A CONSENT ORDER AGAINST BANK OF AMERICA, NATIONAL ASSOCIATION AND FIA CARD SERVICES, NATIONAL ASSOCIATION. THE ORDER IDENTIFIED DEFICIENCIES IN CONNECTION WITH FULFILLMENT OF CUSTOMER PROCESSING CONCERNING THE PROVISION OF IDENTITY THEFT PROTECTION PRODUCTS AS WELL AS VENDOR AND RISK MANAGEMENT PROTOCOLS CONCERNING SO-CALLED "ADD-ON" PRODUCTS.
Initiated By:	THE OFFICE OF THE COMPTROLLER OF THE CURRENCY
Date Initiated:	04/07/2014
Docket/Case Number:	AA-EC-2014-6
Principal Product Type:	Other



Other Product Type(s):	IDENTITY PROTECTION PRODUCTS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION UNDERTAKING
Resolution:	Order
Resolution Date:	04/07/2014
Sanctions Ordered:	Monetary/Fine \$25,000,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, BANK OF AMERICA, NATIONAL ASSOCIATION AND FIA CARD SERVICES, NATIONAL ASSOCIATION CONSENTED TO A CIVIL MONETARY PENALTY OF \$25,000,000. FURTHER, THE CONSENT ORDER REQUIRES A RESTITUTION PLAN TO BE SUBMITTED TO THE OCC AND, FOLLOWING APPROVAL, THE PROVISION OF RESTITUTION TO BORROWERS. IN ADDITION, THE CONSENT ORDER REQUIRES THE SUBMISSION OF ENHANCED VENDOR MANAGEMENT POLICIES; ENHANCED RISK MANAGEMENT POLICIES AND PROCEDURES; AND ENHANCED INTERNAL AUDIT REVIEWS OF ADD-ON PRODUCTS TO ASSESS UNFAIR, DECEPTIVE, OR ABUSIVE ACTS OR PRACTICES ("UDAAP") RISK.

Disclosure 160 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	ON APRIL 7, 2014, THE CONSUMER FINANCIAL PROTECTION BUREAU ("CFPB") ISSUED A CONSENT ORDER AGAINST BANK OF AMERICA, NATIONAL ASSOCIATION AND FIA CARD SERVICES, NATIONAL ASSOCIATION. THE ORDER IDENTIFIED DEFICIENCIES IN CONNECTION WITH FULFILLMENT OF CUSTOMER PROCESSING CONCERNING THE PROVISION OF IDENTITY THEFT PROTECTION PRODUCTS AS WELL AS VENDOR AND RISK MANAGEMENT PROTOCOLS CONCERNING SO-CALLED "ADD-ON" PRODUCTS. IN ADDITION, THE CFPB IDENTIFIED WHAT IT ALLEGED WERE DECEPTIVE STATEMENTS IN CONNECTION WITH THE MARKETING AND SALE OF CREDIT CARD DEBT CANCELLATION PRODUCTS.



Initiated By:	CONSUMER FINANCIAL PROTECTION BUREAU
Date Initiated:	04/07/2014
Docket/Case Number:	2014-CFPB-0004
Principal Product Type:	Other
Other Product Type(s):	CREDIT PROTECTION AND IDENTITY PROTECTION PRODUCTS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST RESTITUTION UNDERTAKING
Resolution:	Order
Resolution Date:	04/07/2014
Sanctions Ordered:	Monetary/Fine \$20,000,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	WITHOUT ADMITTING OR DENYING ANY FINDINGS OF FACT OR VIOLATIONS OF LAW OR WRONGDOING, BANK OF AMERICA, NATIONAL ASSOCIATION AND FIA CARD SERVICES, NATIONAL ASSOCIATION CONSENTED TO A CIVIL MONETARY PENALTY OF \$20,000,000 AND TO CEASE AND DESIST FROM ENGAGING IN FURTHER VIOLATIONS OF LAW IN CONNECTION WITH THE MARKETING AND ADMINISTRATION OF CREDIT PROTECTION PRODUCTS AND THE BILLING AND ADMINISTRATION OF IDENTITY PROTECTION PRODUCTS. FURTHER, THE CONSENT ORDER REQUIRES A RESTITUTION PLAN TO BE SUBMITTED TO THE CFPB AND, FOLLOWING APPROVAL, THE PROVISION OF RESTITUTION TO BORROWERS. IN ADDITION, THE CONSENT ORDER REQUIRES THE SUBMISSION OF ENHANCED VENDOR MANAGEMENT POLICIES; ENHANCED RISK MANAGEMENT POLICIES AND PROCEDURES; AND ENHANCED INTERNAL AUDIT REVIEWS OF ADD-ON PRODUCTS TO ASSESS UNFAIR, DECEPTIVE, OR ABUSIVE ACTS OR PRACTICES ("UDAAP") RISK.
Firm Statement	WITHOUT ADMITTING OR DENYING ANY FINDINGS OF FACT OR VIOLATIONS OF LAW OR WRONGDOING, BANK OF AMERICA, NATIONAL ASSOCIATION AND FIA CARD SERVICES, NATIONAL ASSOCIATION CONSENTED TO A CIVIL MONETARY PENALTY OF \$20,000,000 AND TO CEASE AND DESIST FROM ENGAGING IN FURTHER VIOLATIONS OF LAW IN CONNECTION WITH THE MARKETING AND ADMINISTRATION OF CREDIT PROTECTION PRODUCTS AND THE BILLING AND ADMINISTRATION OF



IDENTITY PROTECTION PRODUCTS. FURTHER, THE CONSENT ORDER REQUIRES A RESTITUTION PLAN TO BE SUBMITTED TO THE CFPB AND, FOLLOWING APPROVAL, THE PROVISION OF RESTITUTION TO BORROWERS. IN ADDITION, THE CONSENT ORDER REQUIRES THE SUBMISSION OF ENHANCED VENDOR MANAGEMENT POLICIES; ENHANCED RISK MANAGEMENT POLICIES AND PROCEDURES; AND ENHANCED INTERNAL AUDIT REVIEWS OF ADD-ON PRODUCTS TO ASSESS UNFAIR, DECEPTIVE, OR ABUSIVE ACTS OR PRACTICES ("UDAAP") RISK.

Reporting Source:	Firm
Affiliate:	FIA CARD SERVICES, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	ON APRIL 7, 2014, THE CONSUMER FINANCIAL PROTECTION BUREAU ("CFPB") ISSUED A CONSENT ORDER AGAINST BANK OF AMERICA, NATIONAL ASSOCIATION AND FIA CARD SERVICES, NATIONAL ASSOCIATION. THE ORDER IDENTIFIED DEFICIENCIES IN CONNECTION WITH FULFILLMENT OF CUSTOMER PROCESSING CONCERNING THE PROVISION OF IDENTITY THEFT PROTECTION PRODUCTS AS WELL AS VENDOR AND RISK MANAGEMENT PROTOCOLS CONCERNING SO-CALLED "ADD-ON" PRODUCTS. IN ADDITION, THE CFPB IDENTIFIED WHAT IT ALLEGED WERE DECEPTIVE STATEMENTS IN CONNECTION WITH THE MARKETING AND SALE OF CREDIT CARD DEBT CANCELLATION PRODUCTS.
Initiated By:	CONSUMER FINANCIAL PROTECTION BUREAU
Date Initiated:	04/07/2014
Docket/Case Number:	2014-CFPB-0004
Principal Product Type:	Other
Other Product Type(s):	CREDIT PROTECTION AND IDENTITY PROTECTION PRODUCTS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST RESTITUTION UNDERTAKING
Resolution:	Order
Resolution Date:	04/07/2014
Sanctions Ordered:	Monetary/Fine \$20,000,000.00



Disgorgement/Restitution
Cease and Desist/Injunction

Other Sanctions Ordered:

UNDERTAKINGS

Sanction Details:

WITHOUT ADMITTING OR DENYING ANY FINDINGS OF FACT OR VIOLATIONS OF LAW OR WRONGDOING, BANK OF AMERICA, NATIONAL ASSOCIATION AND FIA CARD SERVICES, NATIONAL ASSOCIATION CONSENTED TO A CIVIL MONETARY PENALTY OF \$20,000,000 AND TO CEASE AND DESIST FROM ENGAGING IN FURTHER VIOLATIONS OF LAW IN CONNECTION WITH THE MARKETING AND ADMINISTRATION OF CREDIT PROTECTION PRODUCTS AND THE BILLING AND ADMINISTRATION OF IDENTITY PROTECTION PRODUCTS. FURTHER, THE CONSENT ORDER REQUIRES A RESTITUTION PLAN TO BE SUBMITTED TO THE CFPB AND, FOLLOWING APPROVAL, THE PROVISION OF RESTITUTION TO BORROWERS. IN ADDITION, THE CONSENT ORDER REQUIRES THE SUBMISSION OF ENHANCED VENDOR MANAGEMENT POLICIES; ENHANCED RISK MANAGEMENT POLICIES AND PROCEDURES; AND ENHANCED INTERNAL AUDIT REVIEWS OF ADD-ON PRODUCTS TO ASSESS UNFAIR, DECEPTIVE, OR ABUSIVE ACTS OR PRACTICES ("UDAAP") RISK.

Firm Statement

WITHOUT ADMITTING OR DENYING ANY FINDINGS OF FACT OR VIOLATIONS OF LAW OR WRONGDOING, BANK OF AMERICA, NATIONAL ASSOCIATION AND FIA CARD SERVICES, NATIONAL ASSOCIATION CONSENTED TO A CIVIL MONETARY PENALTY OF \$20,000,000 AND TO CEASE AND DESIST FROM ENGAGING IN FURTHER VIOLATIONS OF LAW IN CONNECTION WITH THE MARKETING AND ADMINISTRATION OF CREDIT PROTECTION PRODUCTS AND THE BILLING AND ADMINISTRATION OF IDENTITY PROTECTION PRODUCTS. FURTHER, THE CONSENT ORDER REQUIRES A RESTITUTION PLAN TO BE SUBMITTED TO THE CFPB AND, FOLLOWING APPROVAL, THE PROVISION OF RESTITUTION TO BORROWERS. IN ADDITION, THE CONSENT ORDER REQUIRES THE SUBMISSION OF ENHANCED VENDOR MANAGEMENT POLICIES; ENHANCED RISK MANAGEMENT POLICIES AND PROCEDURES; AND ENHANCED INTERNAL AUDIT REVIEWS OF ADD-N PRODUCTS TO ASSESS UNFAIR, DECEPTIVE, OR ABUSIVE ACTS OR PRACTICES ("UDAAP") RISK.

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Reporting Source:

Firm

Affiliate:

BANK OF AMERICA MEXICO, S.A., INSTITUCION DE BANCA MULTIPLE

Current Status:

Final

Allegations:

THE CNBV ALLEGED THAT DURING THE FOURTH QUARTER OF 2008, BANK OF AMERICA MEXICO, S.A., INSTITUCION DE BANCA MULTIPLE



PARTICIPATED IN TRADING ACTIVITY INVOLVING MEXICAN GOVERNMENT BONDS THAT RAN CONTRARY TO PROVISIONS UNDER ARTICLE 370 OF THE MEXICAN SECURITIES LAW.

Initiated By: COMISION NACIONAL BANCARIA Y DE VALORES ("CNBV")

Date Initiated: 11/01/2013

Docket/Case Number: EXP.:211.115.11(109)"2011"/196/4

Principal Product Type: Debt - Government

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Decision

Resolution Date: 11/01/2013

Sanctions Ordered: Monetary/Fine \$540,000.00

Other Sanctions Ordered: N/A

Sanction Details: THE CNBV FINED BANK OF AMERICA MEXICO, S.A. 7,257,420.00 PESOS (APPROXIMATELY USD\$540,000) FOR THE VIOLATION.

Firm Statement THE CNBV FINED BANK OF AMERICA MEXICO, S.A., INSTITUCION DE BANCA MULTIPLE 7,257,420.00 PESOS (APPROXIMATELY USD\$ 540,000) FOR PARTICIPATING IN TRADING ACTIVITY INVOLVING MEXICAN GOVERNMENT BONDS, IN THE FOURTH QUARTER OF 2008, THAT RAN CONTRARY TO PROVISIONS UNDER ARTICLE 370 OF THE MEXICAN SECURITIES LAW. BANK OF AMERICA MEXICO S.A. INSTITUCION DE BANCA MULTIPLE PAID SAID FINES ON NOVEMBER 1, 2013.

Disclosure 162 of 170

Reporting Source: Firm

Affiliate: BANK OF AMERICA MEXICO, S.A., INSTITUCION DE BANCA MULTIPLE

Current Status: Final

Allegations: BANCO DE MEXICO ALLEGED THAT DURING THE PERIOD FROM MARCH 14-29, 2011, BANK OF AMERICA MEXICO, S.A. INSTITUCION DE BANCA MULTIPLE ("BANK OF AMERICA MEXICO") VIOLATED NUMERALS 3.1.1 AND 3.2.1 OF CIRCULAR 4/2006 WHEN BANK OF AMERICA MEXICO PERFORMED CREDIT DERIVATIVE TRANSACTIONS AS INTERMEDIARY WITH HAVING THE



BANCO DE MEXICO AUTHORIZATION TO PERFORM SUCH TRANSACTIONS.

Initiated By: BANCO DE MEXICO

Date Initiated: 04/11/2011

Docket/Case Number: RESOLUTION: S34-128-2011

Principal Product Type: Derivative(s)

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Decision

Resolution Date: 10/06/2011

Sanctions Ordered: Monetary/Fine \$7,355.56

Other Sanctions Ordered: N/A

Sanction Details: BANCO DE MEXICO FINED BANK OF AMERICA MEXICO 99,482.00 PESOS (APPROXIMATELY USD\$7,355.56 FOR THE VIOLATION.

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

Disclosure 163 of 170

Reporting Source: Firm

Affiliate: BANK OF AMERICA CORPORATION

Current Status: Final

Allegations: THE SECURITIES AND EXCHANGE COMMISSION ("COMMISSION") ALLEGED THAT BANK OF AMERICA CORPORATION ("BAC"), AS PART OF ITS REGULATORY CAPITAL CALCULATIONS, FAILED TO DEDUCT CERTAIN REALIZED LOSSES ON CERTAIN STRUCTURED NOTES AND OTHER FINANCIAL INSTRUMENTS (THE "NOTES") ISSUED BY MERRILL LYNCH & CO., INC. ("ML&CO.") THAT BAC ASSUMED OR ACQUIRED AS PART OF ITS ACQUISITION OF ML&CO. AND, THEREFORE, BAC OVERSTATED ITS



REGULATORY CAPITAL IN ITS FORM 10-Q FILINGS FROM 2009-2014 AND IN ITS FORM 10-K FILINGS FOR FINANCIAL YEARS 2009-2013. THE COMMISSION ALLEGED THAT BAC VIOLATED SECTION 13(B)(2)(A) AND (B) OF THE EXCHANGE ACT.

Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	09/29/2014
Docket/Case Number:	3-16177
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:	CEASE AND DESIST
Resolution:	Settled
Resolution Date:	09/29/2014
Sanctions Ordered:	Monetary/Fine \$7,650,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	BAC, WITHOUT ADMITTING OR DENYING THE COMMISSION'S FINDINGS, EXCEPT AS TO THE COMMISSION'S JURISDICTION OVER IT AND THE SUBJECT MATTER OF THE PROCEEDINGS, AGREED TO (1)CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTIONS 13(B)(2)(A) AND 13(B)(2)(B) OF THE EXCHANGE ACT, AND (2) PAY A CIVIL MONEY PENALTY OF \$7,650,000. THE PENALTY WAS PAID ON OCTOBER 7, 2014.
Firm Statement	THE COMMISSION NOTED THAT BAC SELF IDENTIFIED AND SELF REPORTED THE OVERSTATEMENTS AND THE COMMISSION NOTED THAT BAC HAD PROVIDED SUBSTANTIAL COOPERATION TO THE COMMISSION STAFF. THE COMMISSION ALSO NOTED THAT BAC HAD VOLUNTARILY UNDERTAKEN STEPS TO REMEDIATE AND ADDRESS, AMONG OTHER THINGS, THE INADEQUATE BOOKS AND INTERNAL ACCOUNTING CONTROL DEFICIENCIES THAT WERE THE SUBJECT OF THE PROCEEDING.

Disclosure 164 of 170

Reporting Source:	Firm
Affiliate:	BANKAMERICA CORPORATION (NKA BANK OF AMERICA CORPORATION



Current Status:	Final
Allegations:	THE SECURITIES AND EXCHANGE COMMISSION ("COMMISSION") FOUND THAT IN 1997 AND 1998, BANKAMERICA CORPORATION ("BANKAMERICA"), PREDECESSOR OF THE CORPORATE PARENT OF THE APPLICANT, VIOLATED VARIOUS SECURITIES EXCHANGE ACT ACCOUNTING AND REPORTING PROVISIONS WITH RESPECT TO A BUSINESS ALLIANCE BETWEEN BANKAMERICA AND D.E. SHAW SECURITIES GROUP, L.P. AND RELATED ENTITIES.
Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	07/30/2001
Docket/Case Number:	3-10541
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	07/30/2001
Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	ON JULY 30, 2001, WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, CHARGES OR FINDINGS, THE APPLICANT'S CORPORATION PARENT (BANK OF AMERICA CORPORATION) CONSENTED TO ENTRY OF AN ADMINISTRATIVE ORDER PROVIDING THAT IT CEASE AND DESIST FROM COMMITTING OR CAUSING ANY FUTURE VIOLATIONS OF THE EXCHANGE ACT ACCOUNTING AND REPORTING PROVISIONS CITED IN THE COMMISSION'S ALLEGATIONS.
Sanction Details:	
Firm Statement	ON JULY 30, 2001, WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, CHARGES OR FINDINGS, THE APPLICANT'S CORPORATION PARENT (BANK OF AMERICA CORPORATION) CONSENTED TO ENTRY OF AN ADMINISTRATIVE ORDER PROVIDING THAT IT CEASE AND DESIST FROM COMMITTING OR CAUSING ANY FUTURE VIOLATIONS OF THE EXCHANGE ACT ACCOUNTING AND REPORTING PROVISIONS CITED IN THE COMMISSION'S ALLEGATIONS.


Disclosure 165 of 170

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA CORPORATION
Current Status:	Final
Allegations:	THE SECURITIES AND EXCHANGE COMMISSION ("COMMISSION") ALLEGED THAT BANK OF AMERICA CORPORATION ("BAC") FAILED TO MAKE REQUIRED DISCLOSURES IN THE MANAGEMENT'S DISCUSSION AND ANALYSIS AND RESULTS OF OPERATIONS ("MD&A") SECTIONS OF PERIODIC FILINGS, RELATED TO KNOWN UNCERTAINTIES AS TO WHETHER CERTAIN COSTS RELATED TO LOANS BAC WOULD ULTIMATELY BE REQUIRED TO REPURCHASE FROM CERTAIN INSURERS WOULD HAVE A MATERIAL EFFECT ON BAC'S FUTURE INCOME FROM CONTINUING OPERATIONS. THE COMMISSION ALLEGED THAT BAC VIOLATED SECTION 13(A) OF THE EXCHANGE ACT AND RULES 12B-20 AND 13A-13 THEREUNDER.
Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	08/21/2014
Docket/Case Number:	ADMINISTRATIVE PROCEEDING NO. 3-16028
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:	CEASE AND DESIST
Resolution:	Settled
Resolution Date:	08/21/2014
Sanctions Ordered:	Monetary/Fine \$20,000,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	N/A
Sanction Details:	BAC AGREED TO (1) CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 13(A) OF THE EXCHANGE ACT AND RULES 12B-20 AND 13A-13 PROMULGATED THEREUNDER; AND (2) PAY A CIVIL MONEY PENALTY OF \$20 MILLION.
Firm Statement	BAC ADMITTED TO CERTAIN FACTS SET OUT IN AN ANNEX TO THE ADMINISTRATIVE ORDER, ACKNOWLEDGE THAT ITS CONDUCT SET FORTH



IN THE ANNEX TO THE ADMINISTRATIVE ORDER VIOLATED THE FEDERAL SECURITIES LAW AND ADMITTED TO THE COMMISSION'S JURISDICTION OVER IT AND THE SUBJECT MATTER OF THE PROCEEDINGS.

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA CORPORATION
Current Status:	Final
Allegations:	BANK OF AMERICA CORPORATION ("BAC") ALLEGEDLY HAD DEFICIENCIES IN CERTAIN INTERNAL ANTI-MONEY LAUNDERING CONTROLS RELATING TO SOUTH AMERICAN MONEY SERVICE BUSINESS CUSTOMERS.
Initiated By:	NEW YORK COUNTY (NEW YORK) DISTRICT ATTORNEY
Date Initiated:	03/01/2004
Docket/Case Number:	L03-005071
Principal Product Type:	Other
Other Product Type(s):	CORRESPONDENT BANK ACCOUNT
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	09/28/2006
Sanctions Ordered:	Monetary/Fine \$6,000,000.00
Other Sanctions Ordered:	PLUS ADDITIONAL \$1.5 MILLION FOR COST OF INVESTIGATION.
Sanction Details:	BAC WILL PAY TOTAL OF \$7.5 MILLION, \$6 MILLION OF WHICH WILL BE PAID TO THE CITY AND STATE OF NEW YORK AND \$1.5 MILLION TO BE PAID TO THE NEW YORK COUNTY (NEW YORK) DISTRICT ATTORNEY FOR THE COST OF THE INVESTIGATION.
Firm Statement	BAC ENTERED INTO A CIVIL SETTLEMENT AGREEMENT WITH THE NEW YORK COUNTY (NEW YORK) DISTRICT ATTORNEY (DA) ON SEPTEMBER 28, 2006. THE AGREEMENT PROVIDES THAT, FROM ABOUT 2002 TO 2004, BAC HAD DEFICIENCIES IN CERTAIN INTERNAL ANTI-MONEY LAUNDERING CONTROLS AND FAILED TO REACT APPROPRIATELY TO THE RISK PRESENTED BY CERTAIN SOUTH AMERICAN MONEY SERVICES BUSINESS CUSTOMERS, WHO MOVED FUNDS ILLEGALLY THROUGH BAC. THE



AGREEMENT REQUIRES AC TO MAKE A TOTAL PAYMENT OF \$7.5 MILLION, TO COOPERATE WITH THE DA IN ONGOING INVESTIGATIONS, AND TO ABIDE BY ANTI-MONEY LAUNDERING CHANGES RECOMMENDED BY BAC'S REGULATORS.

Disclosure 167 of 170

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



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

Firm Statement

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

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Reporting Source:	Firm
Affiliate:	BANK OF AMERICA CORPORATION
Current Status:	Final
Allegations:	THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM CONDUCTED A REVIEW CONCERNING VARIOUS TYPES OF ANTI-COMPETITIVE ACTIVITY BY CERTAIN BANK OF AMERICA CORPORATION (THE "BANK") EMPLOYEES IN CONJUNCTION WITH THE SALE OF CERTAIN DERIVATIVE FINANCIAL PRODUCTS TO MUNICIPALITIES AND NON-PROFIT ORGANIZATIONS VARIOUSLY BETWEEN 1998 AND 2003. FOLLOWING THE REVIEW, THE BANK AND THE RESERVE BANK ENTERED INTO A FORMAL WRITTEN AGREEMENT TO ENSURE THAT THE BANK PROACTIVELY AND APPROPRIATELY MANAGED ITS COMPLIANCE RISK RELATED TO CERTAIN COMPETITIVELY BID TRANSACTIONS.
Initiated By:	FEDERAL RESERVE BANK OF RICHMOND (THE "RESERVE BANK")
Date Initiated:	12/06/2010
Docket/Case Number:	10-240-WA/RB-HC
Principal Product Type:	Derivative(s)

**Other Product Type(s):**

Principal Sanction(s)/Relief Sought: Undertaking

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 12/06/2010

Sanctions Ordered:

Other Sanctions Ordered: UNDERTAKING TO ASSESS COMPLIANCE RISK PROGRAMS.

Sanction Details: THE BANK HAS ENTERED INTO A WRITTEN AGREEMENT ON DECEMBER 6, 2010, WITH THE RESERVE BANK. UNDER THE TERMS OF THE WRITTEN AGREEMENT, THE BANK HAS AGREED TO SUBMIT A WRITTEN PLAN TO STRENGTHEN BOARD OVERSIGHT OF THE BANK'S COMPLIANCE RISK MANAGEMENT PROGRAM AS IT RELATES TO CERTAIN TYPES OF COMPETITIVELY BID TRANSACTIONS. IN ADDITION, THE BANK AGREED TO SUBMIT A WRITTEN PLAN TO STRENGTHEN THE BANK'S COMPLIANCE RISK MANAGEMENT PROGRAM REGARDING THOSE SAME COMPETITIVELY BID TRANSACTIONS, AND TO PROMPTLY IMPLEMENT THAT PLAN ONCE IT IS APPROVED BY THE RESERVE BANK.

Firm Statement

THE BANK HAS ENTERED INTO A WRITTEN AGREEMENT ON DECEMBER 6, 2010, WITH THE RESERVE BANK. UNDER THE TERMS OF THE WRITTEN AGREEMENT, THE BANK HAS AGREED TO SUBMIT A WRITTEN PLAN TO STRENGTHEN BOARD OVERSIGHT OF THE BANK'S COMPLIANCE RISK MANAGEMENT PROGRAM AS IT RELATES TO CERTAIN TYPES OF COMPETITIVELY BID TRANSACTIONS. IN ADDITION, THE BANK AGREED TO SUBMIT A WRITTEN PLAN TO STRENGTHEN THE BANK'S COMPLIANCE RISK MANAGEMENT PROGRAM REGARDING THOSE SAME COMPETITIVELY BID TRANSACTIONS, AND TO PROMPTLY IMPLEMENT THAT PLAN ONCE IT IS APPROVED BY THE RESERVE BANK.

Disclosure 169 of 170

Reporting Source: Firm

Affiliate: BANK OF AMERICA CORPORATION

Current Status: Final

Allegations: ON MAY 20, 2015, THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM ("FRB") ISSUED AN ORDER TO CEASE AND DESIST AND ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY AGAINST BANK OF AMERICA



CORPORATION ("BAC") RELATING TO ITS FOREIGN EXCHANGE ("FX") ACTIVITIES ("ORDER") FROM 2008 THROUGH 2013. THE ORDER STATES THAT (A)BAC LACKED ADEQUATE FIRM-WIDE GOVERNANCE, RICH MANAGEMENT, COMPLIANCE AND AUDIT POLICIES AND PROCEDURES TO ENSURE THAT CERTAIN OF THE FIRM'S FX ACTIVITIES COMPLIED WITH SAFE AND SOUND BANKING PRACTICES, APPLICABLE U.S. LAWS AND REGULATIONS, INCLUDING POLICIES AND PROCEDURES TO PREVENT POTENTIAL VIOLATIONS OF THE U.S. COMMODITIES, ANTITRUST AND CRIMINAL FRAUD LAWS, AND APPLICABLE INTERNAL POLICIES; (B)BAC'S DEFICIENT POLICIES AND PROCEDURES PREVENTED BAC FROM DETECTING AND ADDRESSING PERIODIC CONDUCT BY BANK OF AMERICA, N.A.'S TRADERS RELATING TO CERTAIN COMMUNICATIONS BY THESE TRADERS; AND (C)AS A RESULT OF DEFICIENT POLICIES AND PROCEDURES DESCRIBED ABOVE, BAC ENGAGED IN UNSAFE AND UNSOUND BANKING PRACTICES.

Initiated By:	BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
Date Initiated:	05/20/2015
Docket/Case Number:	15-010-B-HC, 15-010-CMP-HC
Principal Product Type:	Other
Other Product Type(s):	FOREIGN EXCHANGE
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST REMEDIAL ACTIONS
Resolution:	Settled
Resolution Date:	05/20/2015
Sanctions Ordered:	Monetary/Fine \$205,000,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	REMEDIAL ACTIONS
Sanction Details:	IN THE ORDER, BAC AGREED TO PAY A CIVIL MONEY PENALTY IN THE TOTAL AMOUNT OF \$205 MILLION AND CONTINUE TO IMPLEMENT ADDITIONAL IMPROVEMENTS IN ITS INTERNAL CONTROLS, COMPLIANCE, RISK MANAGEMENT, AND AUDIT PROGRAMS FOR THE FX ACTIVITIES IN ORDER TO COMPLY WITH BAC POLICIES, SAFE AND SOUND BANKING PRACTICES, AND APPLICABLE U.S. LAWS/REGULATION. SPECIFICALLY BAC AGREED: (A)BAC SHALL SUBMIT A WRITTEN PLAN TO IMPROVE SENIOR MANAGEMENT'S OVERSIGHT OF BAC'S COMPLIANCE WITH APPLICABLE U.S. LAWS/REGULATIONS AND INTERNAL POLICIES IN CONNECTION WITH



CERTAIN WHOLESALE TRADING AND SALES ACTIVITIES; (B)BAC SHALL SUBMIT AN ENHANCED WRITTEN INTERNAL CONTROLS AND COMPLIANCE PROGRAM TO COMPLY WITH APPLICABLE U.S. LAWS/REGULATIONS WITH RESPECT TO CERTAIN WHOLESALE TRADING AND SALES ACTIVITIES; (C)BAC SHALL SUBMIT A WRITTEN PLAN TO IMPROVE ITS COMPLIANCE RISK MANAGEMENT PROGRAM WITH REGARD TO COMPLIANCE WITH APPLICABLE U.S. LAWS/REGULATIONS WITH RESPECT TO CERTAIN WHOLESALE TRADING AND SALES ACTIVITIES; (D)BAC MANAGEMENT SHALL ANNUALLY CONDUCT A REVIEW OF COMPLIANCE POLICIES AND PROCEDURES APPLICABLE TO CERTAIN WHOLESALE TRADING AND SALES ACTIVITIES AND THEIR IMPLEMENTATION AND AN APPROPRIATE RISK-FOCUSED SAMPLING OF OTHER KEY CONTROLS FOR CERTAIN WHOLESALE TRADING AND SALES ACTIVITIES; (E)BAC SHALL SUBMIT AN ENHANCED WRITTEN INTERNAL AUDIT PROGRAM WITH RESPECT TO COMPLIANCE WITH U.S. LAWS/REGULATIONS IN CERTAIN WHOLESALE TRADING AND SALES ACTIVITIES; AND (F)BAC SHALL NOT IN THE FUTURE DIRECTLY OR INDIRECTLY RETAIN ANY INDIVIDUALS AS AN OFFICER, EMPLOYEE, AGENT, CONSULTANT, OR CONTRACTOR OF BAC OR ANY SUBSIDIARY WHO, BASED ON THE INVESTIGATIVE RECORD COMPLIED BY U.S. AUTHORITIES, PARTICIPATED IN THE MISCONDUCT UNDERLYING THE ORDER, HAS BEEN SUBJECT TO FORMAL DISCIPLINARY ACTION AS A RESULT OF BAC'S INTERNAL DISCIPLINARY REVIEW OR PERFORMANCE REVIEW IN CONNECTION WITH THE CONDUCT AND HAS EITHER SEPARATED FROM BAC OR ANY SUBSIDIARY THEREOF OR HAD HIS/HER EMPLOYMENT TERMINATED

Firm Statement

IN SETTLEMENT OF THIS MATTER, BAC CONSENTED AND AGREED TO THE ISSUANCE OF THE ORDER, WHICH FRB HAS DETERMINED TO ACCEPT AND HAS ISSUED. THE ALLEGATIONS, DISPOSITIONS, FINDINGS AND SANCTIONS OF THE ORDER ARE DESCRIBED ABOVE IN ITEMS 7 AND 12.

Disclosure 170 of 170

Reporting Source: Firm

Affiliate: BANK OF AMERICA CORPORATION

Current Status: Final

Allegations: ON APRIL 13, 2011, THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM ("FEDERAL RESERVE") ISSUED A CEASE AND DESIST CONSENT ORDER ("CONSENT ORDER") AGAINST BANK OF AMERICA CORPORATION ("BAC"). THE CONSENT ORDER MAKES NO FINDING ON ANY ISSUES OF FACT OR LAW ANY EXPLICIT ALLEGATION CONCERNING BAC. THE CONSENT ORDER DESCRIBES A CONSENT ORDER THAT THE OFFICE OF THE COMPTROLLER OF THE CURRENCY ("OCC") AND BANK OF AMERICA, N.A. (THE "BANK"), WHICH IS OWNED AND CONTROLLED BY



BAC, ENTERED INTO ADDRESSING AREAS OF WEAKNESS IDENTIFIED BY THE OCC IN MORTGAGE LOAN SERVICING, LOSS MITIGATION, FORECLOSURE ACTIVITIES, AND RELATED FUNCTIONS BY THE BANK. THE CONSENT ORDER ALSO STATES THAT THE OCC'S FINDINGS RAISED CONCERNS THAT BAC DID NOT ADEQUATELY ASSESS THE POTENTIAL RISKS ASSOCIATED WITH SUCH ACTIVITIES OF THE BANK. THE CONSENT ORDER DIRECTS THE BOARD OF DIRECTORS OF BAC TO TAKE APPROPRIATE STEPS TO ENSURE THAT THE BANK COMPLIES WITH THE OCC CONSENT ORDER.

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



CONNECTION WITH THE MATTER. THE CONSENT ORDER WAS ISSUED ON APRIL 13, 2011, THE HIGHLIGHTS OF WHICH ARE DESCRIBED ABOVE IN ITEM 7. THE SANCTIONS IMPOSED ARE EXPLAINED ABOVE IN ITEM 12.C.



Regulatory - On Appeal

Disclosure 1 of 1

Reporting Source:	Firm
Affiliate:	MERRILL LYNCH ARGENTINA S.A.
Current Status:	On Appeal
Appealed To and Date Appeal Filed:	APPEALED TO FEDERAL ADMINISTRATIVE CONTENTIOUS COURT OF APPEALS IN BUENOS AIRES ON OCTOBER 1, 2025.
Allegations:	ON OCTOBER 14, 2020, THE ARGENTINA FINANCIAL INFORMATION UNIT ("UIF") INITIATED ADMINISTRATIVE PROCEEDINGS AGAINST MERRILL LYNCH ARGENTINA S.A. ALLEGING THE COMPANY DID NOT FULLY COMPLY WITH OBLIGATIONS ESTABLISHED UNDER UIF RESOLUTIONS CONCERNING IDENTIFICATION OF CUSTOMERS AND CONTROLS TO DETECT, TRACK AND REPORT SUSPICIOUS TRANSACTIONS.
Initiated By:	ARGENTINA FINANCIAL INFORMATION UNIT
Date Initiated:	10/14/2020
Docket/Case Number:	FILE UIF NO. 1367/17
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:	Decision
Resolution Date:	09/17/2025
Sanctions Ordered:	Monetary/Fine \$8,845,394.00
Other Sanctions Ordered:	
Sanction Details:	UIF IMPOSED AN ADMINISTRATIVE FINE ON MERRILL LYNCH ARGENTINA S.A. ("MLASA") IN THE AMOUNT OF ARS 13,091,183,804 (APPROXIMATELY USD 8,845,394) IN CONNECTION WITH THE DECISION. MLASA APPEALED THE DECISION AND THE APPEAL IS PENDING BEFORE THE FEDERAL ADMINISTRATIVE CONTENTIOUS COURT OF APPEALS IN BUENOS AIRES.
Firm Statement	ON SEPTEMBER 17, 2025, THE UIF ISSUED A DECISION FINDING THAT MLASA DID NOT FULLY COMPLY WITH OBLIGATIONS ESTABLISHED UNDER UIF RESOLUTIONS CONCERNING IDENTIFICATION OF CUSTOMERS AND



CONTROLS TO DETECT, TRACK AND REPORT SUSPICIOUS TRANSACTIONS. UIF IMPOSED AN ADMINISTRATIVE FINE ON MLASA IN THE AMOUNT OF ARS 13,091,183,804 (APPROXIMATELY USD 8,845,394) IN CONNECTION WITH THE DECISION. MLASA APPEALED THE DECISION AND THE APPEAL IS PENDING BEFORE THE FEDERAL ADMINISTRATIVE CONTENTIOUS COURT OF APPEALS IN BUENOS AIRES.



Criminal - Final Disposition

Disclosure 1 of 1

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Status Date:	5/27/2024
Charge Details:	BANK OF AMERICA, NATIONAL ASSOCIATION (BANA) WAS CHARGED WITH PROVIDING AN ELECTRONIC BILL PAYMENT COLLECTION SERVICE WITHOUT OBTAINING AUTHORIZATION FROM THE OFFICE OF THE ELECTRONIC TRANSACTIONS COMMISSION, IN VIOLATION OF SECTIONS 32, 34 AND 45 OF THE ELECTRONIC TRANSACTIONS ACT B.E. 2544 (2001), SECTIONS 12,14 AND 24 OF THE ELECTRONIC TRANSACTIONS ACT (NO.3) B.E. 2562 (2019), AND SECTIONS 3 AND 7 OF THE ROYAL DECREE REGULATING ON ELECTRONIC PAYMENT SERVICES B.E. 2551 (2008). BANA ENTERED A NOT GUILTY PLEA.
Felony:	Yes
Court Details:	BANGKOK SOUTH CRIMINAL COURT, BANGKOK, THAILAND, CASE NO. 1294/2565
Charge Date:	09/05/2022
Disposition Details:	THE BANGKOK SOUTH CRIMINAL COURT IN THAILAND (COURT) ISSUED A JUDGMENT FINDING BANA GUILTY UNDER SECTIONS 32, 34 AND 45 OF THE ELECTRONIC TRANSACTIONS ACT B.E. 2544 (JUDGMENT). THE JUDGEMENT IMPOSED A FINE IN THE AMOUNT OF THB 20,000 (APPROXIMATELY \$540 USD) ON BANA.
Firm Statement	ON OR AROUND SEPTEMBER 5, 2022, BANA RECEIVED NOTIFICATION OF A CRIMINAL COMPLAINT ("COMPLAINT") FILED BY THAILAND'S OFFICE OF THE ATTORNEY GENERAL ("THAILAND") IN THE COURT. THE COMPLAINT ALLEGED THAT BANA PROVIDED AN ELECTRONIC BILL PAYMENT COLLECTION SERVICE WITHOUT OBTAINING AN AUTHORIZATION FROM THE OFFICE OF THE ELECTRONIC TRANSACTIONS COMMISSION BETWEEN MAY 14, 2009 AND JUNE 23, 2016. THAILAND CONDUCTED AN INQUIRY PRIOR TO FILING THE COMPLAINT. BANA DENIED THE CHARGES AT THE INQUIRY STAGE. THE COURT ISSUED A JUDGMENT FINDING BANA GUILTY UNDER SECTIONS 32, 34 AND 45 OF THE ELECTRONIC TRANSACTIONS ACT B.E. 2544. THE JUDGMENT IMPOSED A FINE IN THE AMOUNT OF THB 20,000 (APPROXIMATELY \$540 USD) ON BANA. BANA OBTAINED AN ENGLISH TRANSLATION OF THE JUDGMENT ON MAY 27, 2024.



Civil - Final

Disclosure 1 of 9

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, N.A.
Current Status:	Final
Allegations:	ON MARCH 12, 2012, THE DEPARTMENT OF JUSTICE AND THE ATTORNEYS GENERAL OF 49 STATES AND THE DISTRICT OF COLUMBIA FILED A COMPLAINT ("COMPLAINT") AND CONSENT JUDGMENT AGAINST BANK OF AMERICA CORPORATION, BANK OF AMERICA, N.A., BAC HOME LOANS SERVICING, LP F/K/A COUNTRYWIDE HOME LOANS SERVICING, LP, COUNTRYWIDE HOME LOANS, INC., COUNTRYWIDE FINANCIAL CORPORATION, COUNTRYWIDE MORTGAGE VENTURES, LLC, AND/OR COUNTRYWIDE BANK, FSB (TOGETHER, "BANK OF AMERICA") AND OTHER MAJOR MORTGAGE SERVICERS TO SETTLE A NUMBER OF RELATED INVESTIGATIONS INTO RESIDENTIAL LOAN SERVICING AND ORIGINATION PRACTICES (THE "SETTLEMENT"). THE COMPLAINT ALLEGED THE DEFENDANT'S MISCONDUCT RELATED TO ITS ORIGINATION AND SERVICING OF SINGLE FAMILY RESIDENTIAL MORTGAGES CAUSED THE DEFENDANTS TO HAVE VIOLATED, AMONG OTHER LAWS, THE UNFAIR AND DECEPTIVE ACTS AND PRACTICES LAWS OF THE PLAINTIFF STATES, THE FALSE CLAIMS ACT, THE FINANCIAL INSTITUTIONS REFORM, RECOVERY, AND ENFORCEMENT ACT OF 1989, THE SERVICEMEMBERS CIVIL RELIEF ACT, AND THE BANKRUPTCY CODE AND FEDERAL RULES OF BANKRUPTCY PROCEDURE.
Initiated By:	U.S. DEPARTMENT OF JUSTICE AND THE ATTORNEYS GENERAL OF 49 STATES AND THE DISTRICT OF COLUMBIA
Court Details:	U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, DOCKET NUMBER 1:12-CV-00361-RMC
Date Court Action Filed:	04/05/2012
Principal Product Type:	Other
Other Product Types:	RESIDENTIAL MORTGAGE LOAN SERVICING AND ORIGINATION
Relief Sought:	Civil Penalty(ies)/Fine(s)
Other Relief Sought:	RESTITUTION OTHER: ADDITIONAL SERVICING & ORIGINATION STANDARDS
Resolution:	Settled
Resolution Date:	04/05/2012
Sanctions Ordered or Relief	Monetary/Fine \$0.00



Granted:	Disgorgement/Restitution
Other Sanctions:	THE TOTAL AMOUNT OF THE SETTLEMENT IS \$10,956,615,075.00, AND CONSISTS OF THE THREE COMPONENTS AS FURTHER DESCRIBED IN 13.C. UP TO \$120 MILLION OF THIS AMOUNT MAY BE TREATED AS A CIVIL PENALTY AT THE DISCRETION OF THE STATES AND DISTRICT OF COLUMBIA. THE AMOUNT IS BEING DISCLOSED IN THIS SECTION 13.B INSTEAD OF IN THE BOX ABOVE AS THE EXACT AMOUNT TO BE TREATED AS A CIVIL PENALTY IS NOT KNOWN. OTHER SANCTIONS: ADDITIONAL SERVICING AND ORIGINATION STANDARDS.
Sanction Details:	BANK OF AMERICA CORPORATION AND/OR ITS AFFILIATED ENTITIES SHALL PAY OR CAUSE TO BE PAID INTO AN INTEREST BEARING ESCROW ACCOUNT TO BE ESTABLISHED FOR THIS PURPOSE THE SUM OF \$2,382,415,075, WHICH SUM SHALL BE ADDED TO FUNDS BEING PAID BY OTHER INSTITUTIONS RESOLVING CLAIMS IN THIS MATTER AND ACCORDING TO CERTAIN CRITERIA ESTABLISHED IN THE SETTLEMENT. UP TO \$120 MILLION OF THIS AMOUNT MAY BE TREATED AS A CIVIL PENALTY. IN ADDITION, BANK OF AMERICA SHALL PROVIDE \$7,626,200,000 OF RELIEF TO CONSUMERS WHO MEET CERTAIN ELIGIBILITY CRITERIA RELATING TO SERVICING OF LOANS. THE ADDITIONAL SERVICING AND ORIGINATION STANDARDS INCLUDE THE DEVELOPMENT OF NEW OR ENHANCED PROGRAMS TO PROVIDE BORROWER ASSISTANCE, THE DEVELOPMENT OF PROPRIETARY PROGRAMS TO PROVIDE EXPANDED MORTGAGE MODIFICATION SOLUTIONS, INCLUDING THE BROADER USE OF PRINCIPAL REDUCTIONS IF PERMITTED BY THE MORTGAGE INVESTOR, ENHANCED PROGRAMS FOR UNEMPLOYED, MILITARY SERVICE MEMBERS AND OTHER CUSTOMERS WITH IDENTIFIED SPECIAL SITUATIONS, ENHANCED FACILITATION OF SHORT SALES, AND THE OFFER OF OTHER ASSISTANCE PROGRAMS, SUCH AS DEED IN-LIEU OF FORECLOSURE AND FUNDS FOR FAMILIES TRANSITIONING OUT OF HOME OWNERSHIP. ALSO, BANK OF AMERICA SHALL PROVIDE \$948,000,000 TO A NEW REFINANCING PROGRAM FOR CURRENT CONSUMERS WHO MEET OTHER ELIGIBILITY CRITERIA. THE REFINANCING PROGRAM IS INTENDED TO EXPAND REFINANCING OPPORTUNITIES OR LOWER INTEREST RATES ON BANK OF AMERICA OWNED MORTGAGES TO PROVIDE REDUCED PAYMENTS FOR MANY HOMEOWNERS WHO ARE CURRENT ON THEIR PAYMENTS BUT OWE MORE THAN THE CURRENT VALUE OF THEIR HOMES. FOLLOWING FINALIZATION OF THE SETTLEMENT TERMS, BANK OF AMERICA WILL FINALIZE ITS PROGRAM ENHANCEMENTS AND PROVIDE ADDITIONAL DETAILS OF ELIGIBILITY REQUIREMENTS.
Firm Statement	BANK OF AMERICA CONSENTED TO THE ENTRY OF THE CONSENT JUDGMENT WITHOUT ADMITTING THE ALLEGATIONS IN THE COMPLAINT OTHER THAN THOSE FACTS DEEMED NECESSARY TO JURISDICTION. THE ALLEGATIONS ARE DESCRIBED IN ITEM 7 ABOVE AND THE SANCTIONS ARE DESCRIBED IN ITEM 13 ABOVE. BANK OF AMERICA MADE ITS PAYMENT TO



THE ESCROW AGENT N APRIL 11, 2012. THE SETTLEMENT DOES NOT
RESULT IN AN INJUNCTION OR ANY FINDINGS OF VIOLATIONS OF LAW.

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA CORPORATION
Current Status:	Final
Allegations:	ON MARCH 12, 2012, THE DEPARTMENT OF JUSTICE AND THE ATTORNEYS GENERAL OF 49 STATES AND THE DISTRICT OF COLUMBIA FILED A COMPLAINT ("COMPLAINT") AND CONSENT JUDGMENT AGAINST BANK OF AMERICA CORPORATION, BANK OF AMERICA, N.A., BAC HOME LOANS SERVICING, LP F/K/A COUNTRYWIDE HOME LOANS SERVICING, LP, COUNTRYWIDE HOME LOANS, INC., COUNTRYWIDE FINANCIAL CORPORATION, COUNTRYWIDE MORTGAGE VENTURES, LLC, AND/OR COUNTRYWIDE BANK, FSB (TOGETHER, "BANK OF AMERICA") AND OTHER MAJOR MORTGAGE SERVICERS TO SETTLE A NUMBER OF RELATED INVESTIGATIONS INTO RESIDENTIAL LOAN SERVICING AND ORIGINATION PRACTICES (THE "SETTLEMENT"). THE COMPLAINT ALLEGED THE DEFENDANT'S MISCONDUCT RELATED TO ITS ORIGINATION AND SERVICING OF SINGLE FAMILY RESIDENTIAL MORTGAGES CAUSED THE DEFENDANTS TO HAVE VIOLATED, AMONG OTHER LAWS, THE UNFAIR AND DECEPTIVE ACTS AND PRACTICES LAWS OF THE PLAINTIFF STATES, THE FALSE CLAIMS ACT, THE FINANCIAL INSTITUTIONS REFORM, RECOVERY, AND ENFORCEMENT ACT OF 1989, THE SERVICEMEMBERS CIVIL RELIEF ACT, AND THE BANKRUPTCY CODE AND FEDERAL RULES OF BANKRUPTCY PROCEDURE.
Initiated By:	U.S. DEPARTMENT OF JUSTICE AND THE ATTORNEYS GENERAL OF 49 STATES AND THE DISTRICT OF COLUMBIA
Court Details:	U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, DOCKET NUMBER 1:12-CV-00361-RMC
Date Court Action Filed:	04/05/2012
Principal Product Type:	Other
Other Product Types:	RESIDENTIAL MORTGAGE LOAN SERVICING AND ORIGINATION
Relief Sought:	Civil Penalty(ies)/Fine(s)
Other Relief Sought:	RESTITUTION OTHER: ADDITIONAL SERVICING & ORIGINATION STANDARDS
Resolution:	Settled
Resolution Date:	04/05/2012



**Sanctions Ordered or Relief
Granted:**

Monetary/Fine \$0.00
Disgorgement/Restitution

Other Sanctions:

THE TOTAL AMOUNT OF THE SETTLEMENT IS \$10,956,615,075.00, AND CONSISTS OF THE THREE COMPONENTS AS FURTHER DESCRIBED IN 13.C. UP TO \$120 MILLION OF THIS AMOUNT MAY BE TREATED AS A CIVIL PENALTY AT THE DISCRETION OF THE STATES AND DISTRICT OF COLUMBIA. THE AMOUNT IS BEING DISCLOSED IN THIS SECTION 13.B INSTEAD OF IN THE BOX ABOVE AS THE EXACT AMOUNT TO BE TREATED AS A CIVIL PENALTY IS NOT KNOWN. OTHER SANCTIONS: ADDITIONAL SERVICING AND ORIGINATION STANDARDS.

Sanction Details:

BANK OF AMERICA CORPORATION AND/OR ITS AFFILIATED ENTITIES SHALL PAY OR CAUSE TO BE PAID INTO AN INTEREST BEARING ESCROW ACCOUNT TO BE ESTABLISHED FOR THIS PURPOSE THE SUM OF \$2,382,415,075, WHICH SUM SHALL BE ADDED TO FUNDS BEING PAID BY OTHER INSTITUTIONS RESOLVING CLAIMS IN THIS MATTER AND ACCORDING TO CERTAIN CRITERIA ESTABLISHED IN THE SETTLEMENT. UP TO \$120 MILLION OF THIS AMOUNT MAY BE TREATED AS A CIVIL PENALTY. IN ADDITION, BANK OF AMERICA SHALL PROVIDE \$7,626,200,000 OF RELIEF TO CONSUMERS WHO MEET CERTAIN ELIGIBILITY CRITERIA RELATING TO SERVICING OF LOANS. THE ADDITIONAL SERVICING AND ORIGINATION STANDARDS INCLUDE THE DEVELOPMENT OF NEW OR ENHANCED PROGRAMS TO PROVIDE BORROWER ASSISTANCE, THE DEVELOPMENT OF PROPRIETARY PROGRAMS TO PROVIDE EXPANDED MORTGAGE MODIFICATION SOLUTIONS, INCLUDING THE BROADER USE OF PRINCIPAL REDUCTIONS IF PERMITTED BY THE MORTGAGE INVESTOR, ENHANCED PROGRAMS FOR UNEMPLOYED, MILITARY SERVICE MEMBERS AND OTHER CUSTOMERS WITH IDENTIFIED SPECIAL SITUATIONS, ENHANCED FACILITATION OF SHORT SALES, AND THE OFFER OF OTHER ASSISTANCE PROGRAMS, SUCH AS DEED IN-LIEU OF FORECLOSURE AND FUNDS FOR FAMILIES TRANSITIONING OUT OF HOME OWNERSHIP. ALSO, BANK OF AMERICA SHALL PROVIDE \$948,000,000 TO A NEW REFINANCING PROGRAM FOR CURRENT CONSUMERS WHO MEET OTHER ELIGIBILITY CRITERIA. THE REFINANCING PROGRAM IS INTENDED TO EXPAND REFINANCING OPPORTUNITIES OR LOWER INTEREST RATES ON BANK OF AMERICA OWNED MORTGAGES TO PROVIDE REDUCED PAYMENTS FOR MANY HOMEOWNERS WHO ARE CURRENT ON THEIR PAYMENTS BUT OWE MORE THAN THE CURRENT VALUE OF THEIR HOMES. FOLLOWING FINALIZATION OF THE SETTLEMENT TERMS, BANK OF AMERICA WILL FINALIZE ITS PROGRAM ENHANCEMENTS AND PROVIDE ADDITIONAL DETAILS OF ELIGIBILITY REQUIREMENTS.

Firm Statement

BANK OF AMERICA CONSENTED TO THE ENTRY OF THE CONSENT JUDGMENT WITHOUT ADMITTING THE ALLEGATIONS IN THE COMPLAINT OTHER THAN THOSE FACTS DEEMED NECESSARY TO JURISDICTION. THE ALLEGATIONS ARE DESCRIBED IN ITEM 7 ABOVE AND THE SANCTIONS ARE



DESCRIBED IN ITEM 13 ABOVE. BANK OF AMERICA MADE ITS PAYMENT TO THE ESCROW AGENT N APRIL 11, 2012. THE SETTLEMENT DOES NOT RESULT IN AN INJUNCTION OR ANY FINDINGS OF VIOLATIONS OF LAW.

Reporting Source:	Firm
Affiliate:	BAC HOME LOANS SERVICING, LP (F/K/A COUNTRYWIDE HOME LOANS SERVICING LP)
Current Status:	Final
Allegations:	ON MARCH 12, 2012, THE DEPARTMENT OF JUSTICE AND THE ATTORNEYS GENERAL OF 49 STATES AND THE DISTRICT OF COLUMBIA FILED A COMPLAINT ("COMPLAINT") AND CONSENT JUDGMENT AGAINST BANK OF AMERICA CORPORATION, BANK OF AMERICA, N.A., BAC HOME LOANS SERVICING, LP F/K/A COUNTRYWIDE HOME LOANS SERVICING, LP, COUNTRYWIDE HOME LOANS, INC., COUNTRYWIDE FINANCIAL CORPORATION, COUNTRYWIDE MORTGAGE VENTURES, LLC, AND/OR COUNTRYWIDE BANK, FSB (TOGETHER, "BANK OF AMERICA") AND OTHER MAJOR MORTGAGE SERVICERS TO SETTLE A NUMBER OF RELATED INVESTIGATIONS INTO RESIDENTIAL LOAN SERVICING AND ORIGINATION PRACTICES (THE "SETTLEMENT"). THE COMPLAINT ALLEGED THE DEFENDANT'S MISCONDUCT RELATED TO ITS ORIGINATION AND SERVICING OF SINGLE FAMILY RESIDENTIAL MORTGAGES CAUSED THE DEFENDANTS TO HAVE VIOLATED, AMONG OTHER LAWS, THE UNFAIR AND DECEPTIVE ACTS AND PRACTICES LAWS OF THE PLAINTIFF STATES, THE FALSE CLAIMS ACT, THE FINANCIAL INSTITUTIONS REFORM, RECOVERY, AND ENFORCEMENT ACT OF 1989, THE SERVICEMEMBERS CIVIL RELIEF ACT, AND THE BANKRUPTCY CODE AND FEDERAL RULES OF BANKRUPTCY PROCEDURE.
Initiated By:	U.S. DEPARTMENT OF JUSTICE AND THE ATTORNEYS GENERAL OF 49 STATES AND THE DISTRICT OF COLUMBIA
Court Details:	U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, DOCKET NUMBER 1:12-CV-00361-RMC
Date Court Action Filed:	04/05/2012
Principal Product Type:	Other
Other Product Types:	RESIDENTIAL MORTGAGE LOAN SERVICING AND ORIGINATION
Relief Sought:	Civil Penalty(ies)/Fine(s)
Other Relief Sought:	RESTITUTION OTHER: ADDITIONAL SERVICING & ORIGINATION STANDARDS
Resolution:	Settled



Resolution Date:	04/05/2012
Sanctions Ordered or Relief Granted:	Monetary/Fine \$0.00 Disgorgement/Restitution
Other Sanctions:	THE TOTAL AMOUNT OF THE SETTLEMENT IS \$10,956,615,075.00, AND CONSISTS OF THE THREE COMPONENTS AS FURTHER DESCRIBED IN 13.C. UP TO \$120 MILLION OF THIS AMOUNT MAY BE TREATED AS A CIVIL PENALTY AT THE DISCRETION OF THE STATES AND DISTRICT OF COLUMBIA. THE AMOUNT IS BEING DISCLOSED IN THIS SECTION 13.B INSTEAD OF IN THE BOX ABOVE AS THE EXACT AMOUNT TO BE TREATED AS A CIVIL PENALTY IS NOT KNOWN. OTHER SANCTIONS: ADDITIONAL SERVICING AND ORIGINATION STANDARDS.
Sanction Details:	BANK OF AMERICA CORPORATION AND/OR ITS AFFILIATED ENTITIES SHALL PAY OR CAUSE TO BE PAID INTO AN INTEREST BEARING ESCROW ACCOUNT TO BE ESTABLISHED FOR THIS PURPOSE THE SUM OF \$2,382,415,075, WHICH SUM SHALL BE ADDED TO FUNDS BEING PAID BY OTHER INSTITUTIONS RESOLVING CLAIMS IN THIS MATTER AND ACCORDING TO CERTAIN CRITERIA ESTABLISHED IN THE SETTLEMENT. UP TO \$120 MILLION OF THIS AMOUNT MAY BE TREATED AS A CIVIL PENALTY. IN ADDITION, BANK OF AMERICA SHALL PROVIDE \$7,626,200,000 OF RELIEF TO CONSUMERS WHO MEET CERTAIN ELIGIBILITY CRITERIA RELATING TO SERVICING OF LOANS. THE ADDITIONAL SERVICING AND ORIGINATION STANDARDS INCLUDE THE DEVELOPMENT OF NEW OR ENHANCED PROGRAMS TO PROVIDE BORROWER ASSISTANCE, THE DEVELOPMENT OF PROPRIETARY PROGRAMS TO PROVIDE EXPANDED MORTGAGE MODIFICATION SOLUTIONS, INCLUDING THE BROADER USE OF PRINCIPAL REDUCTIONS IF PERMITTED BY THE MORTGAGE INVESTOR, ENHANCED PROGRAMS FOR UNEMPLOYED, MILITARY SERVICE MEMBERS AND OTHER CUSTOMERS WITH IDENTIFIED SPECIAL SITUATIONS, ENHANCED FACILITATION OF SHORT SALES, AND THE OFFER OF OTHER ASSISTANCE PROGRAMS, SUCH AS DEED IN-LIEU OF FORECLOSURE AND FUNDS FOR FAMILIES TRANSITIONING OUT OF HOME OWNERSHIP. ALSO, BANK OF AMERICA SHALL PROVIDE \$948,000,000 TO A NEW REFINANCING PROGRAM FOR CURRENT CONSUMERS WHO MEET OTHER ELIGIBILITY CRITERIA. THE REFINANCING PROGRAM IS INTENDED TO EXPAND REFINANCING OPPORTUNITIES OR LOWER INTEREST RATES ON BANK OF AMERICA OWNED MORTGAGES TO PROVIDE REDUCED PAYMENTS FOR MANY HOMEOWNERS WHO ARE CURRENT ON THEIR PAYMENTS BUT OWE MORE THAN THE CURRENT VALUE OF THEIR HOMES. FOLLOWING FINALIZATION OF THE SETTLEMENT TERMS, BANK OF AMERICA WILL FINALIZE ITS PROGRAM ENHANCEMENTS AND PROVIDE ADDITIONAL DETAILS OF ELIGIBILITY REQUIREMENTS.
Firm Statement	BANK OF AMERICA CONSENTED TO THE ENTRY OF THE CONSENT JUDGMENT WITHOUT ADMITTING THE ALLEGATIONS IN THE COMPLAINT



OTHER THAN THOSE FACTS DEEMED NECESSARY TO JURISDICTION. THE ALLEGATIONS ARE DESCRIBED IN ITEM 7 ABOVE AND THE SANCTIONS ARE DESCRIBED IN ITEM 13 ABOVE. BANK OF AMERICA MADE ITS PAYMENT TO THE ESCROW AGENT N APRIL 11, 2012. THE SETTLEMENT DOES NOT RESULT IN AN INJUNCTION OR ANY FINDINGS OF VIOLATIONS OF LAW.

Reporting Source:	Firm
Affiliate:	COUNTRYWIDE HOME LOANS, INC.
Current Status:	Final
Allegations:	ON MARCH 12, 2012, THE DEPARTMENT OF JUSTICE AND THE ATTORNEYS GENERAL OF 49 STATES AND THE DISTRICT OF COLUMBIA FILED A COMPLAINT ("COMPLAINT") AND CONSENT JUDGMENT AGAINST BANK OF AMERICA CORPORATION, BANK OF AMERICA, N.A., BAC HOME LOANS SERVICING, LP F/K/A COUNTRYWIDE HOME LOANS SERVICING, LP, COUNTRYWIDE HOME LOANS, INC., COUNTRYWIDE FINANCIAL CORPORATION, COUNTRYWIDE MORTGAGE VENTURES, LLC, AND/OR COUNTRYWIDE BANK, FSB (TOGETHER, "BANK OF AMERICA") AND OTHER MAJOR MORTGAGE SERVICERS TO SETTLE A NUMBER OF RELATED INVESTIGATIONS INTO RESIDENTIAL LOAN SERVICING AND ORIGINATION PRACTICES (THE "SETTLEMENT"). THE COMPLAINT ALLEGED THE DEFENDANT'S MISCONDUCT RELATED TO ITS ORIGINATION AND SERVICING OF SINGLE FAMILY RESIDENTIAL MORTGAGES CAUSED THE DEFENDANTS TO HAVE VIOLATED, AMONG OTHER LAWS, THE UNFAIR AND DECEPTIVE ACTS AND PRACTICES LAWS OF THE PLAINTIFF STATES, THE FALSE CLAIMS ACT, THE FINANCIAL INSTITUTIONS REFORM, RECOVERY, AND ENFORCEMENT ACT OF 1989, THE SERVICEMEMBERS CIVIL RELIEF ACT, AND THE BANKRUPTCY CODE AND FEDERAL RULES OF BANKRUPTCY PROCEDURE.
Initiated By:	U.S. DEPARTMENT OF JUSTICE AND THE ATTORNEYS GENERAL OF 49 STATES AND THE DISTRICT OF COLUMBIA
Court Details:	U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, DOCKET NUMBER 1:12-CV-00361-RMC
Date Court Action Filed:	04/05/2012
Principal Product Type:	Other
Other Product Types:	RESIDENTIAL MORTGAGE LOAN SERVICING AND ORIGINATION
Relief Sought:	Civil Penalty(ies)/Fine(s)
Other Relief Sought:	RESTITUTION OTHER: ADDITIONAL SERVICING & ORIGINATION STANDARDS



Resolution:	Settled
Resolution Date:	04/05/2012
Sanctions Ordered or Relief Granted:	Monetary/Fine \$0.00 Disgorgement/Restitution
Other Sanctions:	THE TOTAL AMOUNT OF THE SETTLEMENT IS \$10,956,615,075.00, AND CONSISTS OF THE THREE COMPONENTS AS FURTHER DESCRIBED IN 13.C. UP TO \$120 MILLION OF THIS AMOUNT MAY BE TREATED AS A CIVIL PENALTY AT THE DISCRETION OF THE STATES AND DISTRICT OF COLUMBIA. THE AMOUNT IS BEING DISCLOSED IN THIS SECTION 13.B INSTEAD OF IN THE BOX ABOVE AS THE EXACT AMOUNT TO BE TREATED AS A CIVIL PENALTY IS NOT KNOWN. OTHER SANCTIONS: ADDITIONAL SERVICING AND ORIGINATION STANDARDS.
Sanction Details:	BANK OF AMERICA CORPORATION AND/OR ITS AFFILIATED ENTITIES SHALL PAY OR CAUSE TO BE PAID INTO AN INTEREST BEARING ESCROW ACCOUNT TO BE ESTABLISHED FOR THIS PURPOSE THE SUM OF \$2,382,415,075, WHICH SUM SHALL BE ADDED TO FUNDS BEING PAID BY OTHER INSTITUTIONS RESOLVING CLAIMS IN THIS MATTER AND ACCORDING TO CERTAIN CRITERIA ESTABLISHED IN THE SETTLEMENT. UP TO \$120 MILLION OF THIS AMOUNT MAY BE TREATED AS A CIVIL PENALTY. IN ADDITION, BANK OF AMERICA SHALL PROVIDE \$7,626,200,000 OF RELIEF TO CONSUMERS WHO MEET CERTAIN ELIGIBILITY CRITERIA RELATING TO SERVICING OF LOANS. THE ADDITIONAL SERVICING AND ORIGINATION STANDARDS INCLUDE THE DEVELOPMENT OF NEW OR ENHANCED PROGRAMS TO PROVIDE BORROWER ASSISTANCE, THE DEVELOPMENT OF PROPRIETARY PROGRAMS TO PROVIDE EXPANDED MORTGAGE MODIFICATION SOLUTIONS, INCLUDING THE BROADER USE OF PRINCIPAL REDUCTIONS IF PERMITTED BY THE MORTGAGE INVESTOR, ENHANCED PROGRAMS FOR UNEMPLOYED, MILITARY SERVICE MEMBERS AND OTHER CUSTOMERS WITH IDENTIFIED SPECIAL SITUATIONS, ENHANCED FACILITATION OF SHORT SALES, AND THE OFFER OF OTHER ASSISTANCE PROGRAMS, SUCH AS DEED IN-LIEU OF FORECLOSURE AND FUNDS FOR FAMILIES TRANSITIONING OUT OF HOME OWNERSHIP. ALSO, BANK OF AMERICA SHALL PROVIDE \$948,000,000 TO A NEW REFINANCING PROGRAM FOR CURRENT CONSUMERS WHO MEET OTHER ELIGIBILITY CRITERIA. THE REFINANCING PROGRAM IS INTENDED TO EXPAND REFINANCING OPPORTUNITIES OR LOWER INTEREST RATES ON BANK OF AMERICA OWNED MORTGAGES TO PROVIDE REDUCED PAYMENTS FOR MANY HOMEOWNERS WHO ARE CURRENT ON THEIR PAYMENTS BUT OWE MORE THAN THE CURRENT VALUE OF THEIR HOMES. FOLLOWING FINALIZATION OF THE SETTLEMENT TERMS, BANK OF AMERICA WILL FINALIZE ITS PROGRAM ENHANCEMENTS AND PROVIDE ADDITIONAL DETAILS OF ELIGIBILITY REQUIREMENTS.
Firm Statement	BANK OF AMERICA CONSENTED TO THE ENTRY OF THE CONSENT



JUDGMENT WITHOUT ADMITTING THE ALLEGATIONS IN THE COMPLAINT OTHER THAN THOSE FACTS DEEMED NECESSARY TO JURISDICTION. THE ALLEGATIONS ARE DESCRIBED IN ITEM 7 ABOVE AND THE SANCTIONS ARE DESCRIBED IN ITEM 13 ABOVE. BANK OF AMERICA MADE ITS PAYMENT TO THE ESCROW AGENT N APRIL 11, 2012. THE SETTLEMENT DOES NOT RESULT IN AN INJUNCTION OR ANY FINDINGS OF VIOLATIONS OF LAW.

Reporting Source:	Firm
Affiliate:	COUNTRYWIDE BANK, FSB
Current Status:	Final
Allegations:	ON MARCH 12, 2012, THE DEPARTMENT OF JUSTICE AND THE ATTORNEYS GENERAL OF 49 STATES AND THE DISTRICT OF COLUMBIA FILED A COMPLAINT ("COMPLAINT") AND CONSENT JUDGMENT AGAINST BANK OF AMERICA CORPORATION, BANK OF AMERICA, N.A., BAC HOME LOANS SERVICING, LP F/K/A COUNTRYWIDE HOME LOANS SERVICING, LP, COUNTRYWIDE HOME LOANS, INC., COUNTRYWIDE FINANCIAL CORPORATION, COUNTRYWIDE MORTGAGE VENTURES, LLC, AND/OR COUNTRYWIDE BANK, FSB (TOGETHER, "BANK OF AMERICA") AND OTHER MAJOR MORTGAGE SERVICERS TO SETTLE A NUMBER OF RELATED INVESTIGATIONS INTO RESIDENTIAL LOAN SERVICING AND ORIGINATION PRACTICES (THE "SETTLEMENT"). THE COMPLAINT ALLEGED THE DEFENDANT'S MISCONDUCT RELATED TO ITS ORIGINATION AND SERVICING OF SINGLE FAMILY RESIDENTIAL MORTGAGES CAUSED THE DEFENDANTS TO HAVE VIOLATED, AMONG OTHER LAWS, THE UNFAIR AND DECEPTIVE ACTS AND PRACTICES LAWS OF THE PLAINTIFF STATES, THE FALSE CLAIMS ACT, THE FINANCIAL INSTITUTIONS REFORM, RECOVERY, AND ENFORCEMENT ACT OF 1989, THE SERVICEMEMBERS CIVIL RELIEF ACT, AND THE BANKRUPTCY CODE AND FEDERAL RULES OF BANKRUPTCY PROCEDURE.
Initiated By:	U.S. DEPARTMENT OF JUSTICE AND THE ATTORNEYS GENERAL OF 49 STATES AND THE DISTRICT OF COLUMBIA
Court Details:	U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, DOCKET NUMBER 1:12-CV-00361-RMC
Date Court Action Filed:	04/05/2012
Principal Product Type:	Other
Other Product Types:	RESIDENTIAL MORTGAGE LOAN SERVICING AND ORIGINATION
Relief Sought:	Civil Penalty(ies)/Fine(s)
Other Relief Sought:	RESTITUTION



OTHER: ADDITIONAL SERVICING & ORIGINATION STANDARDS

Resolution:	Settled
Resolution Date:	04/05/2012
Sanctions Ordered or Relief Granted:	Monetary/Fine \$0.00 Disgorgement/Restitution
Other Sanctions:	THE TOTAL AMOUNT OF THE SETTLEMENT IS \$10,956,615,075.00, AND CONSISTS OF THE THREE COMPONENTS AS FURTHER DESCRIBED IN 13.C. UP TO \$120 MILLION OF THIS AMOUNT MAY BE TREATED AS A CIVIL PENALTY AT THE DISCRETION OF THE STATES AND DISTRICT OF COLUMBIA. THE AMOUNT IS BEING DISCLOSED IN THIS SECTION 13.B INSTEAD OF IN THE BOX ABOVE AS THE EXACT AMOUNT TO BE TREATED AS A CIVIL PENALTY IS NOT KNOWN. OTHER SANCTIONS: ADDITIONAL SERVICING AND ORIGINATION STANDARDS.
Sanction Details:	BANK OF AMERICA CORPORATION AND/OR ITS AFFILIATED ENTITIES SHALL PAY OR CAUSE TO BE PAID INTO AN INTEREST BEARING ESCROW ACCOUNT TO BE ESTABLISHED FOR THIS PURPOSE THE SUM OF \$2,382,415,075, WHICH SUM SHALL BE ADDED TO FUNDS BEING PAID BY OTHER INSTITUTIONS RESOLVING CLAIMS IN THIS MATTER AND ACCORDING TO CERTAIN CRITERIA ESTABLISHED IN THE SETTLEMENT. UP TO \$120 MILLION OF THIS AMOUNT MAY BE TREATED AS A CIVIL PENALTY. IN ADDITION, BANK OF AMERICA SHALL PROVIDE \$7,626,200,000 OF RELIEF TO CONSUMERS WHO MEET CERTAIN ELIGIBILITY CRITERIA RELATING TO SERVICING OF LOANS. THE ADDITIONAL SERVICING AND ORIGINATION STANDARDS INCLUDE THE DEVELOPMENT OF NEW OR ENHANCED PROGRAMS TO PROVIDE BORROWER ASSISTANCE, THE DEVELOPMENT OF PROPRIETARY PROGRAMS TO PROVIDE EXPANDED MORTGAGE MODIFICATION SOLUTIONS, INCLUDING THE BROADER USE OF PRINCIPAL REDUCTIONS IF PERMITTED BY THE MORTGAGE INVESTOR, ENHANCED PROGRAMS FOR UNEMPLOYED, MILITARY SERVICE MEMBERS AND OTHER CUSTOMERS WITH IDENTIFIED SPECIAL SITUATIONS, ENHANCED FACILITATION OF SHORT SALES, AND THE OFFER OF OTHER ASSISTANCE PROGRAMS, SUCH AS DEED IN-LIEU OF FORECLOSURE AND FUNDS FOR FAMILIES TRANSITIONING OUT OF HOME OWNERSHIP. ALSO, BANK OF AMERICA SHALL PROVIDE \$948,000,000 TO A NEW REFINANCING PROGRAM FOR CURRENT CONSUMERS WHO MEET OTHER ELIGIBILITY CRITERIA. THE REFINANCING PROGRAM IS INTENDED TO EXPAND REFINANCING OPPORTUNITIES OR LOWER INTEREST RATES ON BANK OF AMERICA OWNED MORTGAGES TO PROVIDE REDUCED PAYMENTS FOR MANY HOMEOWNERS WHO ARE CURRENT ON THEIR PAYMENTS BUT OWE MORE THAN THE CURRENT VALUE OF THEIR HOMES. FOLLOWING FINALIZATION OF THE SETTLEMENT TERMS, BANK OF AMERICA WILL FINALIZE ITS PROGRAM ENHANCEMENTS AND PROVIDE ADDITIONAL DETAILS OF ELIGIBILITY REQUIREMENTS.

**Firm Statement**

BANK OF AMERICA CONSENTED TO THE ENTRY OF THE CONSENT JUDGMENT WITHOUT ADMITTING THE ALLEGATIONS IN THE COMPLAINT OTHER THAN THOSE FACTS DEEMED NECESSARY TO JURISDICTION. THE ALLEGATIONS ARE DESCRIBED IN ITEM 7 ABOVE AND THE SANCTIONS ARE DESCRIBED IN ITEM 13 ABOVE. BANK OF AMERICA MADE ITS PAYMENT TO THE ESCROW AGENT N APRIL 11, 2012. THE SETTLEMENT DOES NOT RESULT IN AN INJUNCTION OR ANY FINDINGS OF VIOLATIONS OF LAW.

Reporting Source:

Firm

Affiliate:

COUNTRYWIDE MORTGAGE VENTURES, LLC

Current Status:

Final

Allegations:

ON MARCH 12, 2012, THE DEPARTMENT OF JUSTICE AND THE ATTORNEYS GENERAL OF 49 STATES AND THE DISTRICT OF COLUMBIA FILED A COMPLAINT ("COMPLAINT") AND CONSENT JUDGMENT AGAINST BANK OF AMERICA CORPORATION, BANK OF AMERICA, N.A., BAC HOME LOANS SERVICING, LP F/K/A COUNTRYWIDE HOME LOANS SERVICING, LP, COUNTRYWIDE HOME LOANS, INC., COUNTRYWIDE FINANCIAL CORPORATION, COUNTRYWIDE MORTGAGE VENTURES, LLC, AND/OR COUNTRYWIDE BANK, FSB (TOGETHER, "BANK OF AMERICA") AND OTHER MAJOR MORTGAGE SERVICERS TO SETTLE A NUMBER OF RELATED INVESTIGATIONS INTO RESIDENTIAL LOAN SERVICING AND ORIGINATION PRACTICES (THE "SETTLEMENT"). THE COMPLAINT ALLEGED THE DEFENDANT'S MISCONDUCT RELATED TO ITS ORIGINATION AND SERVICING OF SINGLE FAMILY RESIDENTIAL MORTGAGES CAUSED THE DEFENDANTS TO HAVE VIOLATED, AMONG OTHER LAWS, THE UNFAIR AND DECEPTIVE ACTS AND PRACTICES LAWS OF THE PLAINTIFF STATES, THE FALSE CLAIMS ACT, THE FINANCIAL INSTITUTIONS REFORM, RECOVERY, AND ENFORCEMENT ACT OF 1989, THE SERVICEMEMBERS CIVIL RELIEF ACT, AND THE BANKRUPTCY CODE AND FEDERAL RULES OF BANKRUPTCY PROCEDURE.

Initiated By:

U.S. DEPARTMENT OF JUSTICE AND THE ATTORNEYS GENERAL OF 49 STATES AND THE DISTRICT OF COLUMBIA

Court Details:

U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, DOCKET NUMBER 1:12-CV-00361-RMC

Date Court Action Filed:

04/05/2012

Principal Product Type:

Other

Other Product Types:

RESIDENTIAL MORTGAGE LOAN SERVICING AND ORIGINATION

Relief Sought:

Civil Penalty(ies)/Fine(s)



Other Relief Sought:	RESTITUTION OTHER: ADDITIONAL SERVICING & ORIGINATION STANDARDS
Resolution:	Settled
Resolution Date:	04/05/2012
Sanctions Ordered or Relief Granted:	Monetary/Fine \$0.00 Disgorgement/Restitution
Other Sanctions:	THE TOTAL AMOUNT OF THE SETTLEMENT IS \$10,956,615,075.00, AND CONSISTS OF THE THREE COMPONENTS AS FURTHER DESCRIBED IN 13.C. UP TO \$120 MILLION OF THIS AMOUNT MAY BE TREATED AS A CIVIL PENALTY AT THE DISCRETION OF THE STATES AND DISTRICT OF COLUMBIA. THE AMOUNT IS BEING DISCLOSED IN THIS SECTION 13.B INSTEAD OF IN THE BOX ABOVE AS THE EXACT AMOUNT TO BE TREATED AS A CIVIL PENALTY IS NOT KNOWN. OTHER SANCTIONS: ADDITIONAL SERVICING AND ORIGINATION STANDARDS.
Sanction Details:	BANK OF AMERICA CORPORATION AND/OR ITS AFFILIATED ENTITIES SHALL PAY OR CAUSE TO BE PAID INTO AN INTEREST BEARING ESCROW ACCOUNT TO BE ESTABLISHED FOR THIS PURPOSE THE SUM OF \$2,382,415,075, WHICH SUM SHALL BE ADDED TO FUNDS BEING PAID BY OTHER INSTITUTIONS RESOLVING CLAIMS IN THIS MATTER AND ACCORDING TO CERTAIN CRITERIA ESTABLISHED IN THE SETTLEMENT. UP TO \$120 MILLION OF THIS AMOUNT MAY BE TREATED AS A CIVIL PENALTY. IN ADDITION, BANK OF AMERICA SHALL PROVIDE \$7,626,200,000 OF RELIEF TO CONSUMERS WHO MEET CERTAIN ELIGIBILITY CRITERIA RELATING TO SERVICING OF LOANS. THE ADDITIONAL SERVICING AND ORIGINATION STANDARDS INCLUDE THE DEVELOPMENT OF NEW OR ENHANCED PROGRAMS TO PROVIDE BORROWER ASSISTANCE, THE DEVELOPMENT OF PROPRIETARY PROGRAMS TO PROVIDE EXPANDED MORTGAGE MODIFICATION SOLUTIONS, INCLUDING THE BROADER USE OF PRINCIPAL REDUCTIONS IF PERMITTED BY THE MORTGAGE INVESTOR, ENHANCED PROGRAMS FOR UNEMPLOYED, MILITARY SERVICE MEMBERS AND OTHER CUSTOMERS WITH IDENTIFIED SPECIAL SITUATIONS, ENHANCED FACILITATION OF SHORT SALES, AND THE OFFER OF OTHER ASSISTANCE PROGRAMS, SUCH AS DEED IN-LIEU OF FORECLOSURE AND FUNDS FOR FAMILIES TRANSITIONING OUT OF HOME OWNERSHIP. ALSO, BANK OF AMERICA SHALL PROVIDE \$948,000,000 TO A NEW REFINANCING PROGRAM FOR CURRENT CONSUMERS WHO MEET OTHER ELIGIBILITY CRITERIA. THE REFINANCING PROGRAM IS INTENDED TO EXPAND REFINANCING OPPORTUNITIES OR LOWER INTEREST RATES ON BANK OF AMERICA OWNED MORTGAGES TO PROVIDE REDUCED PAYMENTS FOR MANY HOMEOWNERS WHO ARE CURRENT ON THEIR PAYMENTS BUT OWE MORE THAN THE CURRENT VALUE OF THEIR HOMES. FOLLOWING FINALIZATION OF THE SETTLEMENT TERMS, BANK OF AMERICA WILL FINALIZE ITS PROGRAM ENHANCEMENTS AND PROVIDE ADDITIONAL



DETAILS OF ELIGIBILITY REQUIREMENTS.

Firm Statement

BANK OF AMERICA CONSENTED TO THE ENTRY OF THE CONSENT JUDGMENT WITHOUT ADMITTING THE ALLEGATIONS IN THE COMPLAINT OTHER THAN THOSE FACTS DEEMED NECESSARY TO JURISDICTION. THE ALLEGATIONS ARE DESCRIBED IN ITEM 7 ABOVE AND THE SANCTIONS ARE DESCRIBED IN ITEM 13 ABOVE. BANK OF AMERICA MADE ITS PAYMENT TO THE ESCROW AGENT N APRIL 11, 2012. THE SETTLEMENT DOES NOT RESULT IN AN INJUNCTION OR ANY FINDINGS OF VIOLATIONS OF LAW.

Reporting Source:

Firm

Affiliate:

COUNTRYWIDE FINANCIAL CORPORATION

Current Status:

Final

Allegations:

ON MARCH 12, 2012, THE DEPARTMENT OF JUSTICE AND THE ATTORNEYS GENERAL OF 49 STATES AND THE DISTRICT OF COLUMBIA FILED A COMPLAINT ("COMPLAINT") AND CONSENT JUDGMENT AGAINST BANK OF AMERICA CORPORATION, BANK OF AMERICA, N.A., BAC HOME LOANS SERVICING, LP F/K/A COUNTRYWIDE HOME LOANS SERVICING, LP, COUNTRYWIDE HOME LOANS, INC., COUNTRYWIDE FINANCIAL CORPORATION, COUNTRYWIDE MORTGAGE VENTURES, LLC, AND/OR COUNTRYWIDE BANK, FSB (TOGETHER, "BANK OF AMERICA") AND OTHER MAJOR MORTGAGE SERVICERS TO SETTLE A NUMBER OF RELATED INVESTIGATIONS INTO RESIDENTIAL LOAN SERVICING AND ORIGINATION PRACTICES (THE "SETTLEMENT"). THE COMPLAINT ALLEGED THE DEFENDANT'S MISCONDUCT RELATED TO ITS ORIGINATION AND SERVICING OF SINGLE FAMILY RESIDENTIAL MORTGAGES CAUSED THE DEFENDANTS TO HAVE VIOLATED, AMONG OTHER LAWS, THE UNFAIR AND DECEPTIVE ACTS AND PRACTICES LAWS OF THE PLAINTIFF STATES, THE FALSE CLAIMS ACT, THE FINANCIAL INSTITUTIONS REFORM, RECOVERY, AND ENFORCEMENT ACT OF 1989, THE SERVICEMEMBERS CIVIL RELIEF ACT, AND THE BANKRUPTCY CODE AND FEDERAL RULES OF BANKRUPTCY PROCEDURE.

Initiated By:

U.S. DEPARTMENT OF JUSTICE AND THE ATTORNEYS GENERAL OF 49 STATES AND THE DISTRICT OF COLUMBIA

Court Details:

U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, DOCKET NUMBER 1:12-CV-00361-RMC

Date Court Action Filed:

04/05/2012

Principal Product Type:

Other

Other Product Types:

RESIDENTIAL MORTGAGE LOAN SERVICING AND ORIGINATION



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

Other Relief Sought: RESTITUTION
OTHER: ADDITIONAL SERVICING & ORIGINATION STANDARDS

Resolution: Settled

Resolution Date: 04/05/2012

Sanctions Ordered or Relief Granted: Monetary/Fine \$0.00
Disgorgement/Restitution

Other Sanctions: THE TOTAL AMOUNT OF THE SETTLEMENT IS \$10,956,615,075.00, AND CONSISTS OF THE THREE COMPONENTS AS FURTHER DESCRIBED IN 13.C. UP TO \$120 MILLION OF THIS AMOUNT MAY BE TREATED AS A CIVIL PENALTY AT THE DISCRETION OF THE STATES AND DISTRICT OF COLUMBIA. THE AMOUNT IS BEING DISCLOSED IN THIS SECTION 13.B INSTEAD OF IN THE BOX ABOVE AS THE EXACT AMOUNT TO BE TREATED AS A CIVIL PENALTY IS NOT KNOWN. OTHER SANCTIONS: ADDITIONAL SERVICING AND ORIGINATION STANDARDS.

Sanction Details: BANK OF AMERICA CORPORATION AND/OR ITS AFFILIATED ENTITIES SHALL PAY OR CAUSE TO BE PAID INTO AN INTEREST BEARING ESCROW ACCOUNT TO BE ESTABLISHED FOR THIS PURPOSE THE SUM OF \$2,382,415,075, WHICH SUM SHALL BE ADDED TO FUNDS BEING PAID BY OTHER INSTITUTIONS RESOLVING CLAIMS IN THIS MATTER AND ACCORDING TO CERTAIN CRITERIA ESTABLISHED IN THE SETTLEMENT. UP TO \$120 MILLION OF THIS AMOUNT MAY BE TREATED AS A CIVIL PENALTY. IN ADDITION, BANK OF AMERICA SHALL PROVIDE \$7,626,200,000 OF RELIEF TO CONSUMERS WHO MEET CERTAIN ELIGIBILITY CRITERIA RELATING TO SERVICING OF LOANS. THE ADDITIONAL SERVICING AND ORIGINATION STANDARDS INCLUDE THE DEVELOPMENT OF NEW OR ENHANCED PROGRAMS TO PROVIDE BORROWER ASSISTANCE, THE DEVELOPMENT OF PROPRIETARY PROGRAMS TO PROVIDE EXPANDED MORTGAGE MODIFICATION SOLUTIONS, INCLUDING THE BROADER USE OF PRINCIPAL REDUCTIONS IF PERMITTED BY THE MORTGAGE INVESTOR, ENHANCED PROGRAMS FOR UNEMPLOYED, MILITARY SERVICE MEMBERS AND OTHER CUSTOMERS WITH IDENTIFIED SPECIAL SITUATIONS, ENHANCED FACILITATION OF SHORT SALES, AND THE OFFER OF OTHER ASSISTANCE PROGRAMS, SUCH AS DEED IN-LIEU OF FORECLOSURE AND FUNDS FOR FAMILIES TRANSITIONING OUT OF HOME OWNERSHIP. ALSO, BANK OF AMERICA SHALL PROVIDE \$948,000,000 TO A NEW REFINANCING PROGRAM FOR CURRENT CONSUMERS WHO MEET OTHER ELIGIBILITY CRITERIA. THE REFINANCING PROGRAM IS INTENDED TO EXPAND REFINANCING OPPORTUNITIES OR LOWER INTEREST RATES ON BANK OF AMERICA OWNED MORTGAGES TO PROVIDE REDUCED PAYMENTS FOR MANY HOMEOWNERS WHO ARE CURRENT ON THEIR PAYMENTS BUT OWE MORE THAN THE CURRENT VALUE OF THEIR HOMES. FOLLOWING



FINALIZATION OF THE SETTLEMENT TERMS, BANK OF AMERICA WILL FINALIZE ITS PROGRAM ENHANCEMENTS AND PROVIDE ADDITIONAL DETAILS OF ELIGIBILITY REQUIREMENTS.

Firm Statement

BANK OF AMERICA CONSENTED TO THE ENTRY OF THE CONSENT JUDGMENT WITHOUT ADMITTING THE ALLEGATIONS IN THE COMPLAINT OTHER THAN THOSE FACTS DEEMED NECESSARY TO JURISDICTION. THE ALLEGATIONS ARE DESCRIBED IN ITEM 7 ABOVE AND THE SANCTIONS ARE DESCRIBED IN ITEM 13 ABOVE. BANK OF AMERICA MADE ITS PAYMENT TO THE ESCROW AGENT N APRIL 11, 2012. THE SETTLEMENT DOES NOT RESULT IN AN INJUNCTION OR ANY FINDINGS OF VIOLATIONS OF LAW.

Disclosure 2 of 9

Reporting Source:	Firm
Affiliate:	BAC HOME LOANS SERVICING, LP (F/K/A COUNTRYWIDE HOME LOANS SERVICING LP)
Current Status:	Final
Allegations:	THE COMPLAINT ALLEGES THAT FROM JANUARY 1, 2006 THROUGH MAY 31, 2009, HLS FAILED TO DETERMINE CONSISTENTLY AND ACCURATELY THE MILITARY STATUS OF MORTGAGE LOAN BORROWERS IN FORECLOSURE, AND THAT AS A RESULT OF THIS FAILURE, FROM JANUARY 1, 2006 THROUGH MAY 31, 2009, HLS WRONGFULLY FORECLOSED WITHOUT COURT ORDERS ON APPROXIMATELY 160 PROPERTIES OWNED BY SERVICEMEMBERS PROTECTED BY THE SERVICEMEMBERS CIVIL RELIEF ACT ("SCRA").
Initiated By:	THE UNITED STATES DEPARTMENT OF JUSTICE
Court Details:	U.S. DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA; LOS ANGELES, CA; CIVIL ACTION NO. 2:11-CF-04534-PA
Date Court Action Filed:	05/26/2011
Principal Product Type:	Other
Other Product Types:	RESIDENTIAL MORTGAGE LOAN SERVICING
Relief Sought:	Injunction
Other Relief Sought:	MONEY DAMAGES (PRIVATE/CIVIL COMPLAINT CERTAIN UNDERTAKING (SEE 13B BELOW OF DETAILS)
Resolution:	Consent
Resolution Date:	05/31/2011



Sanctions Ordered or Relief Granted:

Cease and Desist/Injunction

Other Sanctions:

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

Sanction Details:

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

Firm Statement

THE CONSENT ORDER REQUIRES HLS TO DEPOSIT \$20 MILLION INTO A "SETTLEMENT FUND" WITHIN 10 BUSINESS DAYS. THE SETTLEMENT FUND WILL BE USED TO COMPENSATE PERSONS DETERMINED TO BE VICTIMS OF VIOLATIONS OF SECTION 533(C) OF SCRA BETWEEN JANUARY 1, 2006 AND MAY 31, 2009. HLS ALSO MUST: DEVELOP AND IMPLEMENT SCRA POLICIES AND PROCEDURES TO ENSURE THAT IS DOES NOT FORECLOSE ON PRE-SERVICE MORTGAGES OF SERVICEMEMBERS; DEVELOP AND IMPLEMENT A FORECLOSURE MONITORING PROGRAM; RECEIVE APPROVAL OF ITS SCRA FORECLOSURE POLICIES AND PROCEDURES AND MONITORING PROGRAM BY COUNSEL FOR THE UNITED STATES; PROVIDE,



OR ENSURE THIRD-PARTY VENDORS PROVIDE, SCRA COMPLIANCE TRAINING TO CERTAIN MANAGEMENT OFFICIALS AND EMPLOYEES; COMMENCE A REVIEW OF CERTAIN NONJUDICIAL FORECLOSURES TO DETERMINE COMPLIANCE WITH SECTION 533(C) OF SCRA; AND CONTRACT WITH ONE OR MORE QUALIFIED INDEPENDENT ACCOUNTING FIRMS TO REVIEW A STATISTICALLY VALID SAMPLE OF HLS' HOME MORTGAGE FILES DURING JANUARY 1, 2008 THROUGH DECEMBER 31, 2010, AND PREPARE A WRITTEN REPORT THAT ADDRESSES, AMONG OTHER THINGS, WHETHER, DURING THE PERIOD OF MILITARY SERVICE AND FOR THE STATUTORILY-REQUIRED PERIOD THEREAFTER, HLS LIMITED THE INTEREST RATE TO A MAXIMUM OF 6 PERCENT PER YEAR. UNLESS OTHERWISE STATED IN THE CONSENT ORDER, THE PROVISIONS OF THE CONSENT ORDER MUST BE IMPLEMENTED WITHIN 60 DAYS. THE CONSENT ORDER IS TO BE IN EFFECT FOR FOUR YEARS, WHICH TERM MAY BE EXTENDED FOR GOOD CAUSE SHOWN. HLS DEPOSITED \$20 MILLION INTO THE INTEREST BEARING ACCOUNT ON JUNE 8, 2011. THE CONSENT ORDER ENJOINS HLS, ITS OFFICERS, EMPLOYEES, AGENTS, REPRESENTATIVES, AND AFFILIATED ASSIGNEES, AND AFFILIATED SUCCESSORS IN INTEREST, AND ALL THOSE IN ACTIVE CONCERT OR PARTICIPATION WITH ANY OF THEM, FROM FORECLOSING ON THE PRE-SERVICE MORTGAGES OF SCRA PROTECTED BORROWERS WITHOUT PROVIDING THE PROTECTIONS CONFERRED BY SCRA.

Disclosure 3 of 9

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA CORPORATION
Current Status:	Final
Allegations:	THE ATTORNEY GENERAL OF THE STATE OF NEW YORK ALLEGES THAT BANK OF AMERICA CORPORATION (BAC"), ITS FORMER CEO KENNETH D. LEWIS AND ITS FORMER CFO JOSEPH L. PRICE ENGAGED IN ACTS PRACTICES IN CONNECTION WITH THE MERGER (THE "MERGER") BETWEEN BAC AND MERRILL LYNCH & CO. INC. ("MERRILL LYNCH") THAT VIOLATED CERTAIN PROVISIONS OF THE NEW YORK GENERAL BUSINESS LAW (THE "MARTIN ACT") AND THE NEW YORK EXECUTIVE LAW.
Initiated By:	ATTORNEY GENERAL OF THE STATE OF NEW YORK
Court Details:	SUPREME COURT OF THE STATE OF NEW YORK, COUNTRY OF NEW YORK
Date Court Action Filed:	02/04/2010
Date Notice/Process Served:	02/04/2010
Principal Product Type:	No Product

**Other Product Types:****Relief Sought:** Civil Penalty(ies)/Fine(s)

Other Relief Sought: DISGORGEMENT
 INJUNCTION
 RESTITUTION
 OTHER: ATTORNEYS' FEES AND OTHER EQUITABLE RELIEF

Resolution: Settled**Resolution Date:** 03/25/2014**Sanctions Ordered or Relief Granted:**

Other Sanctions: BAC AGREED TO PAY THE NEW YORK ATTORNEY GENERAL \$15,000,000 (AS COSTS OF INVESTIGATION AND SUBSEQUENT LITIGATION) AS WELL AS MAKING SEVERAL CORPORATE GOVERNANCE CHANGES.

Sanction Details: BAC AGREED TO PAY THE NEW YORK ATTORNEY GENERAL \$15,000,000 (AS COSTS OF INVESTIGATION AND SUBSEQUENT LITIGATION) AS WELL AS MAKING SEVERAL CORPORATE GOVERNANCE CHANGES.

Firm Statement

ON FEBRUARY 4, 2010, THE NEW YORK ATTORNEY GENERAL FILED A CIVIL COMPLAINT IN THE SUPREME COURT OF NEW YORK STATE, ENTITLED PEOPLE OF THE STATE OF NEW YORK V. BANK OF AMERICA, ET AL. THE COMPLAINT NAMES AS DEFENDANTS BAC AND BAC'S FORMER CHIEF EXECUTIVE AND CHIEF FINANCIAL OFFICER, KENNETH D. LEWIS, AND JOSEPH L. PRICE, AND ALLEGES VIOLATIONS OF SECTIONS 352, 352-C(1)(A), 352-C(1)(C), AND 353 OF THE NEW YORK MARTIN ACT, AND SECTION 63(12) OF THE NEW YORK EXECUTIVE LAW. THE COMPLAINT ATTACKS THE SUFFICIENCY AND ACCURACY OF BANK OF AMERICA'S DISCLOSURES AND ITS PRACTICES RELATED TO PRACTICES RELATED TO BANK OF AMERICA'S MERGER WITH MERRILL LYNCH, INCLUDING : (I)THE DISCLOSURE OF MERRILL LYNCH'S FINANCIAL CONDITION AND ITS INTERIM AND PROJECTED LOSSES DURING THE FOURTH QUARTER OF 2008, (II)BAC'S CONTACTS WITH FEDERAL GOVERNMENT OFFICIALS REGARDING THE BAC'S CONSIDERATION OF INVOKING THE MATERIAL ADVERSE EFFECT CLAUSE IN THE MERGER AGREEMENT WITH MERRILL LYNCH AND POSSIBILITY OF OBTAINING ADDITIONAL GOVERNMENT ASSISTANCE, (III)THE DISCLOSURE OF THE PAYMENT AND TIMING OF YEAR-END INCENTIVE COMPENSATION TO MERRILL LYNCH EMPLOYEES, AND (IV)PUBLIC STATEMENTS REGARDING THE DUE DILIGENCE CONDUCTED IN CONNECTION WITH THE MERGER AND POSITIVE STATEMENTS REGARDING THE MERGER. THE COMPLAINT SEEKS AN UNSPECIFIED AMOUNT IN DISGORGEMENT, PENALTIES, RESTITUTION, AND DAMAGES, COSTS AND OTHER EQUITABLE RELIEF, ALTHOUGH THE NYAG WITHDREW ITS DEMAND FOR DAMAGES. ON MARCH 25, 2014, BAC



ENTERED INTO A SETTLEMENT AGREEMENT TERMINATING THE NEW YORK ATTORNEY GENERAL'S LAWSUIT AGAINST BAC.

Disclosure 4 of 9

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



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

Disclosure 5 of 9

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA CORPORATION
Current Status:	Final
Appellate Court Name and Date Appeal Filed:	N/A
Allegations:	THE SECURITIES AND EXCHANGE COMMISSION ("SEC") ALLEGED THAT BANK OF AMERICA CORPORATION (THE "CORPORATION") VIOLATED SECTION 14(A) OF THE SECURITIES EXCHANGE ACT OF 1934 (THE "EXCHANGE ACT") AND RULE 14A-9 THEREUNDER BY FAILING TO DISCLOSE IN THE CORPORATION'S JOINT PROXY STATEMENT FILED ON NOVEMBER 3, 2008 THE INCENTIVE COMPENSATION THAT MERRILL LYNCH & CO., INC. COULD, IN ITS DISCRETION, AWARD TO ITS EMPLOYEES PRIOR TO COMPLETION OF ITS MERGER WITH THE CORPORATION.
Initiated By:	SECURITIES & EXCHANGE COMMISSION
Court Details:	U.S. DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK; 09-CV-6829
Date Court Action Filed:	08/03/2009
Principal Product Type:	No Product
Other Product Types:	N/A
Relief Sought:	Civil Penalty(ies)/Fine(s)
Other Relief Sought:	INJUNCTION
Resolution:	Consent
Resolution Date:	02/24/2010
Sanctions Ordered or Relief Granted:	Monetary/Fine \$150,000,000.00 Disgorgement/Restitution



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

Disclosure 6 of 9

Reporting Source:	Firm
Affiliate:	BANK OF AMERICA, NATIONAL ASSOCIATION
Current Status:	Final
Allegations:	AFTER AN INDIVIDUAL COMMENCED A QUI TAM LAWSUIT, THE U.S. ATTORNEY FILED A COMPLAINT-IN-INTERVENTION IN 2012 IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK ("COURT") AGAINST COUNTRYWIDE HOME LOANS, INC., COUNTRYWIDE BANK, FSB, BANK OF AMERICA, N.A. AND CERTAIN AFFILIATES ("DEFENDANTS") ALLEGING THAT THE DEFENDANTS ENGAGED IN AN INTENTIONAL SCHEME TO MISREPRESENT THE QUALITY OF THE MORTGAGE LOANS THAT IT PROCESSED THROUGH A PARTICULAR LOAN ORIGINATION PROGRAM AND SOLD TO FANNIE MAE AND FREDDIE MAC DURING AUGUST 2007 TO MAY 2008. THE COMPLAINT SOUGHT TO RECOVER TREBLE DAMAGES AND PENALTIES UNDER THE FALSE CLAIMS ACT, 31 U.S.C. § 3729 ET. SEQ. ("FCA") AND CIVIL PENALTIES UNDER THE FINANCIAL INSTITUTIONS REFORM, RECOVERY, AND ENFORCEMENT ACT, 12 U.S.C. § 1833A ("FIRREA").
Initiated By:	UNITED STATES ATTORNEY FOR THE SOUTHERN DISTRICT OF NEW YORK ("US ATTORNEY")
Court Details:	U.S. DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK, CASE NO. 1:12-CV-1422-JSR
Date Court Action Filed:	07/31/2014



Principal Product Type:	Other
Other Product Types:	WHOLE LOAN SALES
Relief Sought:	Civil Penalty(ies)/Fine(s)
Other Relief Sought:	RESTITUTION; TREBLE DAMAGES
Resolution:	Judgment Rendered
Resolution Date:	07/31/2014
Sanctions Ordered or Relief Granted:	Monetary/Fine \$1,267,491,770.00 Disgorgement/Restitution
Other Sanctions:	
Sanction Details:	<p>IN 2013, THE COURT GRANTED THE DEFENDANT'S MOTION TO DISMISS THE CLAIM FOR TREBLE DAMAGES AND PENALTIES UNDER THE FCA. LATER IN 2013, A JURY FOUND COUNTRYWIDE HOME LOANS, INC. AND COUNTRYWIDE BANK, FSB AND ITS SUCCESSOR IN INTEREST, BANK OF AMERICA, N.A. (COLLECTIVELY, THE "BANK DEFENDANTS") CIVILLY LIABLE FOR VIOLATING FIRREA. ON JULY 30, 2014, THE COURT ENTERED IT OPINION AND ORDER DIRECTING THE CLERK OF THE COURT TO ENTER A JUDGMENT DIRECTING BANK OF AMERICA, N.A., ON BEHALF OF THE BANK DEFENDANTS, TO PAY THE SUM OF \$1,267,491,770. ON JULY 31, 2014, THE CLERK OF THE COURT ENTERED A JUDGMENT. THE BANK DEFENDANTS POSTED A BOND ON AUGUST 22, 2014. ON MAY 23, 2016, THE SECOND CIRCUIT REVERSED THE OUTCOME AT THE TRIAL COURT AND ORDERED THE DISTRICT COURT TO ENTER JUDGMENT IN FAVOR OF THE DEFENDANTS. THE SECOND CIRCUIT RULED, AMONG OTHER THINGS, THAT THE US ATTORNEY DID NOT ARGUE OR PROVE AT TRIAL THAT THE CONTRACTUAL REPRESENTATIONS AT ISSUE WERE EXECUTED WITH CONTEMPORANEOUS INTENT NEVER TO PERFORM, AND THE TRIAL RECORD CONTAINS NO EVIDENCE THAT THE DEFENDANTS HAD FRAUDULENT INTENT IN THE CONTRACT NEGOTIATION OR EXECUTION.</p>
Firm Statement	THE ACTIONS, ALLEGATIONS, DISPOSITION, AND FINDINGS OF THIS MATTER ARE DESCRIBED IN ITEMS 7 AND 13 ABOVE.

Reporting Source:	Firm
Affiliate:	COUNTRYWIDE HOME LOANS, INC.
Current Status:	Final
Allegations:	AFTER AN INDIVIDUAL COMMENCED A QUI TAM LAWSUIT, THE U.S. ATTORNEY FILED A COMPLAINT-IN-INTERVENTION IN 2012 IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK



("COURT") AGAINST COUNTRYWIDE HOME LOANS, INC., COUNTRYWIDE BANK, FSB, BANK OF AMERICA, N.A. AND CERTAIN AFFILIATES ("DEFENDANTS") ALLEGING THAT THE DEFENDANTS ENGAGED IN AN INTENTIONAL SCHEME TO MISREPRESENT THE QUALITY OF THE MORTGAGE LOANS THAT IT PROCESSED THROUGH A PARTICULAR LOAN ORIGINATION PROGRAM AND SOLD TO FANNIE MAE AND FREDDIE MAC DURING AUGUST 2007 TO MAY 2008. THE COMPLAINT SOUGHT TO RECOVER TREBLE DAMAGES AND PENALTIES UNDER THE FALSE CLAIMS ACT, 31 U.S.C. § 3729 ET. SEQ. ("FCA") AND CIVIL PENALTIES UNDER THE FINANCIAL INSTITUTIONS REFORM, RECOVERY, AND ENFORCEMENT ACT, 12 U.S.C. § 1833A ("FIRREA").

Initiated By:	UNITED STATES ATTORNEY FOR THE SOUTHERN DISTRICT OF NEW YORK ("US ATTORNEY")
Court Details:	U.S. DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK, CASE NO. 1:12-CV-1422-JSR
Date Court Action Filed:	07/31/2014
Principal Product Type:	Other
Other Product Types:	WHOLE LOAN SALES
Relief Sought:	Civil Penalty(ies)/Fine(s)
Other Relief Sought:	RESTITUTION; TREBLE DAMAGES
Resolution:	Judgment Rendered
Resolution Date:	07/31/2014
Sanctions Ordered or Relief Granted:	Monetary/Fine \$1,267,491,770.00 Disgorgement/Restitution
Other Sanctions:	
Sanction Details:	IN 2013, THE COURT GRANTED THE DEFENDANT'S MOTION TO DISMISS THE CLAIM FOR TREBLE DAMAGES AND PENALTIES UNDER THE FCA. LATER IN 2013, A JURY FOUND COUNTRYWIDE HOME LOANS, INC. AND COUNTRYWIDE BANK, FSB AND ITS SUCCESSOR IN INTEREST, BANK OF AMERICA, N.A. (COLLECTIVELY, THE "BANK DEFENDANTS") CIVILLY LIABLE FOR VIOLATING FIRREA. ON JULY 30, 2014, THE COURT ENTERED IT OPINION AND ORDER DIRECTING THE CLERK OF THE COURT TO ENTER A JUDGMENT DIRECTING BANK OF AMERICA, N.A., ON BEHALF OF THE BANK DEFENDANTS, TO PAY THE SUM OF \$1,267,491,770. ON JULY 31, 2014, THE CLERK OF THE COURT ENTERED A JUDGMENT. THE BANK DEFENDANTS POSTED A BOND ON AUGUST 22, 2014. ON MAY 23, 2016, THE SECOND CIRCUIT REVERSED THE OUTCOME AT THE TRIAL COURT AND ORDERED THE DISTRICT COURT TO ENTER JUDGMENT IN FAVOR OF THE DEFENDANTS. THE SECOND CIRCUIT RULED, AMONG OTHER THINGS,



THAT THE US ATTORNEY DID NOT ARGUE OR PROVE AT TRIAL THAT THE CONTRACTUAL REPRESENTATIONS AT ISSUE WERE EXECUTED WITH CONTEMPORANEOUS INTENT NEVER TO PERFORM, AND THE TRIAL RECORD CONTAINS NO EVIDENCE THAT THE DEFENDANTS HAD FRAUDULENT INTENT IN THE CONTRACT NEGOTIATION OR EXECUTION.

Firm Statement

THE ACTIONS, ALLEGATIONS, DISPOSITION, AND FINDINGS OF THIS MATTER ARE DESCRIBED IN ITEMS 7 AND 13 ABOVE.

Reporting Source:

Firm

Affiliate:

COUNTRYWIDE BANK, FSB

Current Status:

Final

Allegations:

AFTER AN INDIVIDUAL COMMENCED A QUI TAM LAWSUIT, THE U.S. ATTORNEY FILED A COMPLAINT-IN-INTERVENTION IN 2012 IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK ("COURT") AGAINST COUNTRYWIDE HOME LOANS, INC., COUNTRYWIDE BANK, FSB, BANK OF AMERICA, N.A. AND CERTAIN AFFILIATES ("DEFENDANTS") ALLEGING THAT THE DEFENDANTS ENGAGED IN AN INTENTIONAL SCHEME TO MISREPRESENT THE QUALITY OF THE MORTGAGE LOANS THAT IT PROCESSED THROUGH A PARTICULAR LOAN ORIGINATION PROGRAM AND SOLD TO FANNIE MAE AND FREDDIE MAC DURING AUGUST 2007 TO MAY 2008. THE COMPLAINT SOUGHT TO RECOVER TREBLE DAMAGES AND PENALTIES UNDER THE FALSE CLAIMS ACT, 31 U.S.C. § 3729 ET. SEQ. ("FCA") AND CIVIL PENALTIES UNDER THE FINANCIAL INSTITUTIONS REFORM, RECOVERY, AND ENFORCEMENT ACT, 12 U.S.C. § 1833A ("FIRREA").

Initiated By:

UNITED STATES ATTORNEY FOR THE SOUTHERN DISTRICT OF NEW YORK ("US ATTORNEY")

Court Details:

U.S. DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK, CASE NO. 1:12-CV-1422-JSR

Date Court Action Filed:

07/31/2014

Principal Product Type:

Other

Other Product Types:

WHOLE LOAN SALES

Relief Sought:

Civil Penalty(ies)/Fine(s)

Other Relief Sought:

RESTITUTION; TREBLE DAMAGES

Resolution:

Judgment Rendered

Resolution Date:

07/31/2014



Sanctions Ordered or Relief Granted:	Monetary/Fine \$1,267,491,770.00 Disgorgement/Restitution
Other Sanctions:	
Sanction Details:	IN 2013, THE COURT GRANTED THE DEFENDANT'S MOTION TO DISMISS THE CLAIM FOR TREBLE DAMAGES AND PENALTIES UNDER THE FCA. LATER IN 2013, A JURY FOUND COUNTRYWIDE HOME LOANS, INC. AND COUNTRYWIDE BANK, FSB AND ITS SUCCESSOR IN INTEREST, BANK OF AMERICA, N.A. (COLLECTIVELY, THE "BANK DEFENDANTS") CIVILLY LIABLE FOR VIOLATING FIRREA. ON JULY 30, 2014, THE COURT ENTERED IT OPINION AND ORDER DIRECTING THE CLERK OF THE COURT TO ENTER A JUDGMENT DIRECTING BANK OF AMERICA, N.A., ON BEHALF OF THE BANK DEFENDANTS, TO PAY THE SUM OF \$1,267,491,770. ON JULY 31, 2014, THE CLERK OF THE COURT ENTERED A JUDGMENT. THE BANK DEFENDANTS POSTED A BOND ON AUGUST 22, 2014. ON MAY 23, 2016, THE SECOND CIRCUIT REVERSED THE OUTCOME AT THE TRIAL COURT AND ORDERED THE DISTRICT COURT TO ENTER JUDGMENT IN FAVOR OF THE DEFENDANTS. THE SECOND CIRCUIT RULED, AMONG OTHER THINGS, THAT THE US ATTORNEY DID NOT ARGUE OR PROVE AT TRIAL THAT THE CONTRACTUAL REPRESENTATIONS AT ISSUE WERE EXECUTED WITH CONTEMPORANEOUS INTENT NEVER TO PERFORM, AND THE TRIAL RECORD CONTAINS NO EVIDENCE THAT THE DEFENDANTS HAD FRAUDULENT INTENT IN THE CONTRACT NEGOTIATION OR EXECUTION.
Firm Statement	THE ACTIONS, ALLEGATIONS, DISPOSITION, AND FINDINGS OF THIS MATTER ARE DESCRIBED IN ITEMS 7 AND 13 ABOVE.

Disclosure 7 of 9

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

**Relief Sought:****Other Relief Sought:****Resolution:** Judgment Rendered**Resolution Date:** 06/30/1981**Sanctions Ordered or Relief Granted:****Other Sanctions:****Sanction Details:****Firm Statement**

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

Disclosure 8 of 9**Reporting Source:** Firm**Affiliate:** MERRILL LYNCH & CO., INC. (N/K/A BANK OF AMERICA CORPORATION)**Current Status:** Final

Allegations: IN ITS COMPLAINT, THE SECURITIES AND EXCHANGE COMMISSION ("SEC") ALLEGED THAT THREE YEARS AGO, IN 1999, MERRILL LYNCH & CO., INC. ("ML & CO."), THE PARENT COMPANY OF MERRILL LYNCH, PIERCE, FENNER & SMITH INC. ("MLPFS"), AIDED AND ABETTED ENRON CORP.'S ("ENRON") VIOLATIONS OF SECTIONS 10(B), 13(A), 13(B)(2) AND 13(B)(5) OF THE EXCHANGE ACT AND RULES 10B-5, 12B-20, 13A-1, 13A-13 AND 13B 2-1 THEREUNDER, AS A RESULT OF ML & CO. ENGAGING IN CERTAIN YEAR-END TRANSACTIONS DESIGNED AND PROPOSED BY ENRON. ML & CO. SETTLED THE MATTER WITHOUT ADMITTING OR DENYING THE ALLEGATIONS.

Initiated By: SECURITIES & EXCHANGE COMMISSION**Court Details:** UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS**Date Court Action Filed:** 03/17/2003**Principal Product Type:** No Product**Other Product Types:**



Relief Sought:	Injunction
Other Relief Sought:	CIVIL PENALTIES AND DISGORGEMENT
Resolution:	Consent
Resolution Date:	03/17/2003
Sanctions Ordered or Relief Granted:	Monetary/Fine \$80,000,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions:	
Sanction Details:	PURSUANT TO THE TERMS OF THE SETTLEMENT, MERRILL LYNCH & CO., THE PARENT COMPANY OF MLPFS, CONSENTED, WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, TO THE ENTRY OF AN INJUNCTION, EFFECTIVE MARCH 19, 2003, ENJOINING IT FROM VIOLATING SECTIONS 10(B), 13(B)(2) AND 13(B)(5) OF THE EXCHANGE ACT AND RULES 10B-5, 12B-20, 13A-1, 13A-13 AND 13B2-1 THEREUNDER, ML & CO. ALSO AGREED TO PAY DISGORGEMENT OF \$37,500,000, PREJUDGMENT INTEREST OF \$5,000.000 AND A CIVIL PENALTY \$37,500,000.
Firm Statement	ML& CO., THE PARENT COMPANY OF MLPFS, CONSENTED TO AN INJUNCTIVE ACTION INSTITUTED BY THE SEC. IN ITS COMPLAINT, THE SEC ALLEGED THAT THREE YEARS AGO, IN 1999, ML & CO. AIDED AND ABETTED ENRON'S VIOLATIONS OF THE SECTIONS 10B-5, 12B-20, 13A-1, 13A-13 AND 13B2-1 THEREUNDER, AS A RESULT OF ML & CO. ENGAGING IN CERTAIN YEAR-END TRANSACTIONS DESIGNED AND PROPOSED BY ENRON. WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, ML & O. CONSENTED TO THE ENTRY OF AN INJUNCTION ENJOINING IT FROM VIOLATING THE ABOVE-REFERENCED PROVISIONS, AND AGREED TO PAY DISGORGEMENT, PENALTIES AND INTEREST IN THE AMOUNT OF \$80 MILLION IN ITS RELEASE ANNOUNCING THE SETTLEMENT, THE COMMISSION ACKNOWLEDGE THAT IN AGREEING TO RESOLVE THIS MATTER ON THE TERMS DESCRIBED ABOVE, THE COMMISSION TOOK INTO ACCOUNT CERTAIN AFFIRMATIVE CONDUCT BY ML & CO.

Disclosure 9 of 9

Reporting Source:	Firm
Affiliate:	RECONTRUST COMPANY, N.A.
Current Status:	Final
Allegations:	THE ATTORNEY GENERAL OF THE STATE OF WASHINGTON (THE "AG") ENGAGED IN SETTLEMENT DISCUSSIONS WITH RECONTRUST COMPANY, N.A. ("RECONTRUST") IN CONNECTION WITH AN INVESTIGATION INTO



RECONTRUST'S SERVICES AS A FORECLOSURE TRUSTEE IN THE STATE OF WASHINGTON. ON AUGUST 4, 2011, THE STATE OF WASHINGTON, ACTING THROUGH THE AG, FILED A COMPLAINT ("COMPLAINT") AGAINST RECONTRUST IN THE STATE OF WASHINGTON KING COUNTY SUPERIOR COURT ("SUPERIOR COURT") IN A CIVIL ACTION CAPTIONED STATE OF WASHINGTON V. RECONTRUST COMPANY, N.A. AND THE MATTER WAS LATER REMOVED TO THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE ("DISTRICT COURT"). THE COMPLAINT ALLEGED THAT RECONTRUST, AS A FORECLOSURE TRUSTEE FAILED TO COMPLY WITH THE PROCEDURES OF THE WASHINGTON DEED OF TRUST ACT, RCW 61.24, ET SEQ. ("DEED OF TRUST ACT") IN FORECLOSURES IT CONDUCTED SINCE AT LEAST JUNE 12, 2008. SPECIFICALLY, THE COMPLAINT ALLEGED THAT RECONTRUST: (A) FAILED TO MAINTAIN AN OFFICE IN THE STATE OF WASHINGTON AS REQUIRED BY LAW, (B) FAILED TO CONDUCT FORECLOSURES AS A NEUTRAL THIRD PARTY WITH A DUTY OF GOOD FAITH TOWARDS THE BORROWER AND THE LENDER, (C) CONCEALED OR MISREPRESENTED THE IDENTIFY OF THE ACTUAL OWNER OF THE DEBT, AND (D) INCLUDED MATERIAL MISREPRESENTATIONS IN RECONTRUST'S TRUSTEE'S DEEDS. BASED ON THESE ALLEGATIONS, THE COMPLAINT ALLEGED RECONTRUST VIOLATED THE DEED OF TRUST ACT AND THE CONSUMER PROTECTION ACT, CHAPTER 19.86 RCW ("CPA").

Initiated By:	STATE OF WASHINGTON
Court Details:	U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE, CASE NO. 2:11-CV-1460
Date Court Action Filed:	08/14/2012
Principal Product Type:	No Product
Other Product Types:	
Relief Sought:	Injunction
Other Relief Sought:	
Resolution:	Settled
Resolution Date:	08/20/2012
Sanctions Ordered or Relief Granted:	Cease and Desist/Injunction
Other Sanctions:	PAYMENT OF \$1,090,000 FOR, AMONG OTHER THINGS, THE STATE OF WASHINGTON'S COSTS AND ATTORNEY FEES.
Sanction Details:	RECONTRUST EXECUTED A CONSENT DECREE ("CONSENT"), IN WHICH RECONTRUST DOES NOT ADMIT THE ALLEGATIONS OF THE COMPLAINT OTHER THAN THOSE FACTS DEEMED NECESSARY TO THE JURISDICTION.



ON AUGUST 20, 2012, THE DISTRICT COURT ENTERED A JUDGMENT ("JUDGMENT") THAT, AMONG OTHER THINGS, ENJOINED RECONTRUST FROM DOING BUSINESS AS A FORECLOSURE TRUSTEE UNDER DEEDS OF TRUST WITH RESPECT TO PROPERTY LOCATED IN THE STATE OF WASHINGTON, EXCEPT IN CERTAIN CIRCUMSTANCES ("INJUNCTION").

Firm Statement

THE ALLEGATIONS ARE DESCRIBED IN ITEM 7 ABOVE AND THE SANCTIONS ARE DESCRIBED IN ITEM 13 ABOVE. IN THE CONSENT, RECONTRUST DID NOT ADMIT THE ALLEGATIONS OF THE COMPLAINT OTHER THAN THOSE FACTS DEEMED NECESSARY TO THE JURISDICTION. IN ADDITION, THE CONSENT STATES THAT THE CONSENT OR THE FACT OF ITS ENTRY DOES NOT CONSTITUTE EVIDENCE OF AN ADMISSION BY ANY PARTY REGARDING THE EXISTENCE OR NON-EXISTENCE OF ANY ISSUE, FACT, OR VIOLATION OF ANY LAW ALLEGED BY THE STATE OF WASHINGTON. THE CONSENT FULLY AND FINALLY RESOLVES AND FOREVER DISCHARGES ALL CLAIMS AND CAUSES OF ACTION UNDER THE CPA AND THE DEED OF TRUSTS ACT THAT THE STATE OF WASHINGTON HAS FILED OR MAY IN THE FUTURE FILE AGAINST RECONTRUST ARISING OUT OF OR RELATING TO THE FACTS AND MATTERS DESCRIBED IN THE COMPLAINT, EXCEPT THAT RECONTRUST'S MATERIAL FAILURE TO COMPLY WITH THE CONSENT SHALL PERMIT THE AG TO TAKE SUCH FURTHER ACTION AGAINST RECONTRUST AS PROVIDED IN THE JUDGEMENT.

End of Report



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