

BrokerCheck Report

ROTHSCHILD & CO US INC.

CRD# 2910

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When communicating online or investing with any professional, make sure you know who you're dealing with. <u>Imposters</u> might link to sites like BrokerCheck from <u>phishing</u> or similar scam websites, or through <u>social media</u>, 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
 - o information that regulators report regarding disciplinary actions or allegations against firms or brokers.

How current is this information?

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.
- What if I want to check the background of an investment adviser firm or investment adviser representative?
- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at https://www.adviserinfo.sec.gov. In the alternative, you may search the IAPD website directly or contact your state securities regulator at http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414.
- Are there other resources I can use to check the background of investment professionals?
- FINRA recommends that you learn as much as possible about an investment professional before
 deciding to work with them. Your state securities regulator can help you research brokers and investment adviser
 representatives doing business in your state.

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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.

www.finra.org/brokercheck
User Guidance

ROTHSCHILD & CO US INC.

CRD# 2910

SEC# 8-13852

Main Office Location

1251 AVENUE OF THE AMERICAS NEW YORK, NY 10020 Regulated by FINRA New York Office

Mailing Address

1251 AVENUE OF THE AMERICAS NEW YORK, NY 10020

Business Telephone Number

212-403-3500

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 07/20/1967. Its fiscal year ends in December.

Firm History

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

Firm Operations

This firm is registered with:

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

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

This firm conducts 3 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 1

atory Event

The number of disclosures from non-registered control affiliates is 2

This firm is classified as a corporation.

This firm was formed in Delaware on 07/20/1967.

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.

ROTHSCHILD & CO US INC.

Doing business as ROTHSCHILD & CO US INC.

CRD# 2910

SEC# 8-13852

Main Office Location

1251 AVENUE OF THE AMERICAS NEW YORK, NY 10020

Regulated by FINRA New York Office

Mailing Address

1251 AVENUE OF THE AMERICAS NEW YORK, NY 10020

Business Telephone Number

212-403-3500



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): ROTHSCHILD & CO NORTH AMERICA INC.

Is this a domestic or foreign entity or an individual?

Domestic Entity

Position DIRECT SHAREHOLDER

Position Start Date 10/2000

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):

CARROLL, JOHN MURRAY

2605675

Is this a domestic or foreign entity or an individual?

Individual

Position

DIRECTOR

Position Start Date

10/2010

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):

FELDMAN, TRACY J

2575503

Is this a domestic or foreign entity or an individual?

Individual

Position

DIRECTOR

Position Start Date

09/2018

User Guidance

Direct Owners and Executive Officers (continued)

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of No

the firm? Is this a public reporting

company?

No

Legal Name & CRD# (if any):

LONDON, FRANK STEVEN

5861920

Is this a domestic or foreign entity or an individual?

Individual

Position

CHIEF COMPLIANCE OFFICER

Position Start Date

08/2024

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of Nο

the firm?

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

NEISSA, JAMES MANUEL

2142240

Is this a domestic or foreign entity or an individual?

Individual

Position

DIRECTOR

Position Start Date

09/2016

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):

SCHACKERT, CHRISTA MARY

User Guidance

Direct Owners and Executive Officers (continued)

4219093

Is this a domestic or foreign entity or an individual?

Individual

Position PRINCIPAL FINANCIAL OFFICER, PRINCIPAL OPERATIONS OFFICER,

FINANCIAL OPERATIONS PRINCIPAL & CONTROLLER

Position Start Date 10/2007

Percentage of Ownership Less than 5%

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

No

Is this a public reporting

company?

No

Legal Name & CRD# (if any): SPELLER, MICHAEL CHARLES

3105214

Is this a domestic or foreign entity or an individual?

Individual

Position CHIEF EXECUTIVE OFFICER (FOR REGULATORY AND COMPLIANCE

PURPOSES), PARTNER AND DIRECTOR

Position Start Date 11/2023

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

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



Indirect Owners

Legal Name & CRD# (if any): DE ROTHSCHILD, ALEXANDRE

7837138

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is established

FINANCIERE DE TOURNON SAS

Relationship to Direct Owner

SHAREHOLDER (BARE OWNERSHIP)

Relationship Established

11/2021

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

DE ROTHSCHILD, DAVID RENE

6525089

Is this a domestic or foreign entity or an individual?

Legal Name & CRD# (if any):

Individual

Company through which indirect ownership is established

FINANCIERE DE TOURNON SAS

Relationship to Direct Owner

SHAREHOLDER (USUFRUCT OWNERSHIP)

Relationship Established

08/1975

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):

DE ROTHSCHILD, ERIC

User Guidance

Indirect Owners (continued)

7837142

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is established

BERO SAS

Relationship to Direct Owner

SHAREHOLDER (USUFRUCT OWNERSHIP)

Relationship Established

03/1981

Percentage of Ownership

75% or more

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

Yes

Is this a public reporting

No

company?

Legal Name & CRD# (if any): PARIS ORLEANS HOLDING BANCAIRE SAS

Is this a domestic or foreign entity or an individual?

Foreign Entity

Company through which indirect ownership is established

CONCORDIA HOLDING SARL

Relationship to Direct Owner

SHAREHOLDER

Relationship Established

01/2008

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):

ROTHSCHILD & CO CONTINUATION HOLDINGS AG

Is this a domestic or foreign entity or an individual?

Foreign Entity

Company through which indirect ownership is

ROTHSCHILD & CO NORTH AMERICA INC.

User Guidance

Indirect Owners (continued)

established

Relationship to Direct Owner SHAREHOLDER, COMMON-VOTING

Relationship Established 07/2003

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): **ROTHSCHILD & CO SCA**

Is this a domestic or foreign entity or an individual?

Foreign Entity

Company through which indirect ownership is established

PARIS ORLEANS HOLDING BANCAIRE SAS

Relationship to Direct Owner

SHAREHOLDER

Relationship Established

01/2008

Percentage of Ownership

75% or more

Does this owner direct the management or policies of

the firm?

Yes

Is this a public reporting

company?

established

No

Legal Name & CRD# (if any):

BERO SAS

Is this a domestic or foreign entity or an individual?

Foreign Entity

Company through which indirect ownership is

PONTHIEU RABELAIS SAS

Relationship to Direct Owner

SHAREHOLDER

Relationship Established

08/1985

Percentage of Ownership

50% but less than 75%

User Guidance

Indirect Owners (continued)

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

Yes

Is this a public reporting company?

No

Legal Name & CRD# (if any):

CONCORDIA HOLDING SARL

Is this a domestic or foreign entity or an individual?

Foreign Entity

Company through which indirect ownership is established

ROTHSCHILD & CO CONTINUATION HOLDINGS AG

Relationship to Direct Owner

SHAREHOLDER

Relationship Established

07/2003

Percentage of Ownership

50% but less than 75%

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

Yes

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

ROTHSCHILD & CO CONCORDIA SAS

Is this a domestic or foreign entity or an individual?

Foreign Entity

Company through which indirect ownership is established

ROTHSCHILD & CO SCA

Relationship to Direct Owner

SHAREHOLDER

Relationship Established

01/2008

Percentage of Ownership

50% but less than 75%

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

Yes

Is this a public reporting

company?

No

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User Guidance

Indirect Owners (continued)

Legal Name & CRD# (if any): DE ROTHSCHILD, ANNA

7837140

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is established

BERO SAS

Relationship to Direct Owner

SHAREHOLDER (BARE OWNERSHIP)

Relationship Established

01/1991

Percentage of Ownership

25% but less than 50%

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

Yes

Is this a public reporting company?

No

oompany i

DE ROTHSCHILD. JAMES

7837144

Is this a domestic or foreign entity or an individual?

Legal Name & CRD# (if any):

Individual

Company through which indirect ownership is established

BERO SAS

Relationship to Direct Owner

SHAREHOLDER (BARE OWNERSHIP)

Relationship Established

01/1991

Percentage of Ownership

25% but less than 50%

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

Yes

Is this a public reporting

company?

No

Legal Name & CRD# (if any): DE ROTHSCHILD, PIERRE

7837145

established

User Guidance



Indirect Owners (continued)

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is

BERO SAS

Relationship to Direct Owner

SHAREHOLDER (BARE OWNERSHIP)

Relationship Established

05/1993

Percentage of Ownership

25% but less than 50%

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

Yes

Is this a public reporting company?

No

Legal Name & CRD# (if any):

DE ROTHSCHILD, ROBERT

7837143

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is established

PONTHIEU RABELAIS SAS

Relationship to Direct Owner

SHAREHOLDER

Relationship Established

08/1985

Percentage of Ownership

25% but less than 50%

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

Yes

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

FINANCIERE DE TOURNON SAS

Is this a domestic or foreign entity or an individual?

Foreign Entity

Company through which indirect ownership is

ROTHSCHILD & CO CONCORDIA SAS

User Guidance



Indirect Owners (continued)

established

Relationship to Direct Owner SHAREHOLDER

Relationship Established 01/2008

Percentage of Ownership 25% but less than 50%

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

Yes

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

PARIS ORLEANS HOLDING BANCAIRE SAS

Is this a domestic or foreign entity or an individual?

Foreign Entity

Company through which indirect ownership is established

ROTHSCHILDS & CO CONTINUATION HOLDINGS AG

Relationship to Direct Owner

SHAREHOLDER

Relationship Established

06/2012

Percentage of Ownership

25% but less than 50%

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

Yes

Is this a public reporting

No

company?

Legal Name & CRD# (if any): PONTHIEU RABELAIS SAS

Is this a domestic or foreign entity or an individual?

Foreign Entity

Company through which indirect ownership is established

ROTHSCHILD & CO CONCORDIA SAS

Relationship to Direct Owner

SHAREHOLDER

Relationship Established

01/2008

Percentage of Ownership

25% but less than 50%

User Guidance



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

Yes

Is this a public reporting company?

No

Legal Name & CRD# (if any):

ROTHSCHILD & CO COMMANDITE SAS

Is this a domestic or foreign entity or an individual?

Foreign Entity

Company through which indirect ownership is established

ROTHSCHILD & CO SCA

Relationship to Direct Owner

GENERAL PARTNER

Relationship Established

06/2012

Percentage of Ownership

Other General Partners

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

Yes

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

ROTHSCHILD & CO GESTION SAS

Is this a domestic or foreign entity or an individual?

Foreign Entity

Company through which indirect ownership is established

ROTHSCHILD & CO SCA

Relationship to Direct Owner

GENERAL PARTNER

Relationship Established

06/2012

Percentage of Ownership

Other General Partners

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

Yes

Is this a public reporting company?

No

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Firm History

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

FINCA

No information reported.





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

This firm is currently registered with the SEC, 1 SRO and 53 U.S. states and territories.

| Federal Regulator | Status | Date Effective |
|-------------------|----------|----------------|
| SEC | Approved | 04/24/1968 |

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

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

A government securities broker or dealer only: No

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

| Self-Regulatory Organization | Status | Date Effective |
|------------------------------|----------|----------------|
| FINRA | Approved | 04/24/1968 |





| U.S. States & Territories | Status | Date Effective |
|------------------------------|----------|----------------|
| Alabama | Approved | 02/07/1983 |
| Alaska | Approved | 09/21/1983 |
| Arizona | Approved | 02/15/1983 |
| Arkansas | Approved | 12/20/1984 |
| California | Approved | 06/15/1978 |
| Colorado | Approved | 02/01/1983 |
| Connecticut | Approved | 09/12/1972 |
| Delaware | Approved | 08/10/1983 |
| District of Columbia | Approved | 01/25/1983 |
| Florida | Approved | 04/27/1983 |
| Georgia | Approved | 10/02/1986 |
| Hawaii | Approved | 02/12/1988 |
| Idaho | Approved | 02/10/1986 |
| Illinois | Approved | 09/14/1978 |
| Indiana | Approved | 12/27/1984 |
| Iowa | Approved | 12/26/1984 |
| Kansas | Approved | 08/12/1983 |
| Kentucky | Approved | 08/12/1983 |
| Louisiana | Approved | 04/20/1983 |
| Maine | Approved | 02/14/1984 |
| Maryland | Approved | 01/03/1983 |
| Massachusetts | Approved | 07/31/1981 |
| Michigan | Approved | 02/23/1987 |
| Minnesota | Approved | 07/15/1982 |
| Mississippi | Approved | 09/09/1983 |
| Missouri | Approved | 12/06/1984 |
| Montana | Approved | 11/16/1983 |
| Nebraska | Approved | 04/19/1983 |
| Nevada | Approved | 12/19/1984 |
| New Hampshire | Approved | 08/17/1983 |
| New Jersey | Approved | 07/14/1983 |
| New Mexico | Approved | 09/19/1983 |
| New York | Approved | 01/10/1984 |

| U.S. States & Territories | Status | Date Effective |
|------------------------------|----------|----------------|
| North Carolina | Approved | 02/14/1983 |
| North Dakota | Approved | 03/07/1983 |
| Ohio | Approved | 07/16/1982 |
| Oklahoma | Approved | 02/13/1984 |
| Oregon | Approved | 08/12/1983 |
| Pennsylvania | Approved | 10/30/1973 |
| Puerto Rico | Approved | 02/24/2004 |
| Rhode Island | Approved | 08/31/1983 |
| South Carolina | Approved | 12/20/1984 |
| South Dakota | Approved | 12/20/1984 |
| Tennessee | Approved | 08/17/1981 |
| Texas | Approved | 07/25/1983 |
| Utah | Approved | 01/15/1985 |
| Vermont | Approved | 02/13/1984 |
| Virgin Islands | Approved | 03/02/2009 |
| Virginia | Approved | 08/12/1983 |
| Washington | Approved | 04/20/1983 |
| West Virginia | Approved | 08/17/1983 |
| Wisconsin | Approved | 10/14/1987 |
| Wyoming | Approved | 10/07/1983 |

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 3 types of businesses.

Types of Business

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

Private placements of securities

Other - CORPORATE FINANCE AND GENERAL INVESTMENT BANKING ACTIVITIES

Other Types of Business

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

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

Non-Securities Business Description:





Clearing Arrangements

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

Introducing Arrangements

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

Industry Arrangements



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

Name: VRC COMPANIES, LLC

Business Address: 250 PASSAIC STREET

NEWARK, NJ 07104

Effective Date: 03/01/2023

Description: VARIOUS ACCOUNTING, FINANCIAL AND BUSINESS-RELATED RECORDS

ARE STORED AT VRC COMPANIES, LLC.

Name: MICROSOFT CORPORATION

Business Address: ONE MICROSOFT WAY

REDMOND, WA 98052

Effective Date: 09/30/2021

Description: MICROSOFT EXCHANGE ONLINE STORAGE

Name: MYCOMPLIANCEOFFICE INC.

Business Address: 535 FIFTH AVENUE

4TH FLOOR

NEW YORK, NY 10017

Effective Date: 02/06/2020

Description: COMPLIANCE MANAGEMENT SYSTEM MAINTAINING CERTAIN

COMPLIANCE RECORDS.

Name: IRON MOUNTAIN

Business Address: 203 MOONACHIE ROAD

MOONACHIE, NJ 07074

Effective Date: 06/01/2007

Description: STORAGE OF COMPUTER DATA PURSUANT TO A RENEWABLE ONE-

YEAR CONTRACT.

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.

Industry Arrangements (continued)

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



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.

FIVE ARROWS MANAGERS (USA) LLC is under common control with the firm.

Business Address: 900 3RD AVENUE

19TH FLOOR

NEW YORK, NY 10022

Effective Date: 04/12/2017

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory

Activities:

Yes

Description: ROTHSCHILD & CO US INC. IS UNDER COMMON CONTROL WITH FIVE

ARROWS MANAGERS (USA) LLC. BOTH ROTHSCHILD & CO US INC. AND FIVE ARROWS MANAGERS (USA) LLC ARE INDIRECT SUBSIDIARIES OF

ROTHSCHILD & CO SCA.

ROTHSCHILD & CO REDBURN is under common control with the firm.

CRD #: 140564

Business Address: 461 5TH AVENUE

15TH FLOOR

NEW YORK, NY 10017

Effective Date: 03/16/2023

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory No

Activities:

User Guidance

Organization Affiliates (continued)

Description: ROTHSCHILD & CO US INC. IS UNDER COMMON CONTROL WITH

ROTHSCHILD & CO REDBURN (FORMERLY, REDBURN ATLANTIC). BOTH

ROTHSCHILD & CO US INC. AND ROTHSCHILD & CO REDBURN ARE

INDIRECT SUBSIDIARIES OF ROTHSCHILD & CO CONTINUATION HOLDINGS

AG.

FIVE ARROWS MANAGERS NORTH AMERICA LLC is under common control with the firm.

Business Address: 633 W 5TH STREET

SUITE 5000

LOS ANGELES, CA 90071

Effective Date: 09/14/2015

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory

Yes

Activities:

Description: ROTHSCHILD & CO US INC. IS UNDER COMMON CONTROL WITH FIVE

ARROWS MANAGERS NORTH AMERICA LLC. BOTH ROTHSCHILD & CO US INC. AND FIVE ARROWS MANAGERS NORTH AMERICA LLC ARE INDIRECT

SUBSIDIARIES OF ROTHSCHILD & CO SCA.

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

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

Disclosure Events



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

| | Pending | Final | On Appeal |
|------------------|---------|-------|-----------|
| Regulatory Event | 0 | 1 | 0 |



Disclosure Event Details

What you should know about reported disclosure events:

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

Regulatory - Final

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

Disclosure 1 of 1

Reporting Source: Regulator

Current Status: Final



Allegations:

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

Date Initiated: 09/19/1991

Docket/Case Number: CMS910049(A)-AWC

Principal Product Type: Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 02/23/1992

Sanctions Ordered: Monetary/Fine \$2,500.00

Other Sanctions Ordered:

Sanction Details:

Regulator Statement MARKET SURVEILLANCE COMMITTEE COMPLAINT #CMS910049(A)-AWC: A

LETTER OF ACCEPTANCE, WAIVER AND CONSENT FILED SEPTEMBER 19, 1991 AGAINST RESPONDENT MEMBER ROTHSCHILD, INC. ALLEGING VIOLATIONS OF PART VI, SECTION 5(a) OF SCHEDULE D IN THAT RESPONDENTS FAILED TO REPORT THEIR NASDAQ VOLUME:

THE LETTER OF ACCEPTANCE, WAIVER AND CONSENT WAS ACCEPTED BY THE MARKET SURVEILLANCE COMMITTEE ON DECEMBER 23, 1991 AND BY THE NATIONAL BUSINESS CONDUCT COMMITTEE ON FEBRUARY 23, 1992.

***2,500.00 FINED. ***\$2,500.00 PAID ON 3/10/92 INVOICE

#92-MS-215***

Reporting Source: Firm

Current Status: Final

Allegations: THE MARKET SURVEILLANCE COMMITTEE AND THE NATIONAL BUSINESS

CONDUCT COMMITTEE OF THE NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC. (THE "ASSOCIATION") AS OF FEBRUARY 13, 1992 ACCEPTED A SUBMISSION PURSUANT TO THE ASSOCIATION'S ACCEPTANCE, WAVIER AND CONSENT PROCEDURE IMPOSING A \$2,500 FINE IN CONNECTION WITH THIS FIRM'S FAILURE, IN COMPLIANCE WITH THE PROVISIONS OF



PART VI, SECTION 5(A) OF SCHEDULE D OF THE ASSOCIATION'S BY-LAWS, TO REPORT CERTAIN VOLUME AND NO VOLUME DATA IN THE SECURITIES

OF THREE NON-NMS NASDAQ ISSUERS.

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

Date Initiated: 10/01/1991

Docket/Case Number: NOT AVAILABLE

Principal Product Type: Equity - OTC

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other

Other Sanction(s)/Relief

Sought:

SUBMISSION PURSUANT TO ACCEPTANCE, WAIVER AND CONSENT

PROCEDURE

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 02/13/1992

Sanctions Ordered: Monetary/Fine \$2,500.00

Other Sanctions Ordered: NONE

Sanction Details: THE MARKET SURVEILLANCE COMMITTEE AND THE NATIONAL BUSINESS

CONDUCT COMMITTEE OF THE NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC. (THE "ASSOCIATION") AS OF FEBRUARY 13, 1992 ACCEPTED A SUBMISSION PURSUANT TO THE ASSOCIATION'S ACCEPTANCE, WAVIER AND CONSENT PROCEDURE IMPOSING A \$2,500.00 FINE IN CONNECTION WITH THIS FIRM'S FAILURE, IN COMPLIANCE WITH THE PROVISIONS OF PART VI, SECTION 5(A) OF SCHEDULE D OF THE ASSOCIATION'S BY-LAWS, TO REPORT CERTAIN VOLUME AND NO VOLUME DATA IN THE SECURITIES

OF THREE NON-NMS NASDAQ ISSURERS.

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User Guidance

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 | 2 | 0 |



Disclosure Event Details

Regulatory - Final

Disclosure 1 of 2

Reporting Source: Firm

Affiliate: ROTHSCHILD BANK AG

Current Status: Final

Allegations: FINMA FOUND THAT RBZ AND RTS, FOREIGN AFFILIATES OF ROTHSCHILD

INC., VIOLATED SWISS ANTI-MONEY LAUNDERING LAWS IN RELATION TO BUSINESS RELATIONSHIPS AND TRANSACTIONS INVOLVING A MALAYSIAN

SOVEREIGN WEALTH FUND. ROTHSCHILD INC. DOES NOT CONDUCT

BUSINESS ACTIVITIES WITH RBZ AND RTS, AND ROTHSCHILD INC. HAD NO

INVOLVEMENT IN ANY OF THE FOREGOING MATTERS.

Initiated By: SWISS FINANCIAL MARKET SUPERVISORY AUTHORITY (FINMA)

Date Initiated: 01/01/2016

Docket/Case Number: NA

Principal Product Type:

No Product

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other

Other Sanction(s)/Relief

Sought:

FINMA WILL APPOINT AN EXTERNAL AUDITOR TO REVIEW CORRECTIVE MEASURES ALREADY IMPLEMENTED BY ROTHSCHILD BANK AG ("RBZ") AND ROTHSCHILD TRUST (SWITZERLAND) LTD. ("RTS"), AND FINMA ORDERED RBZ AND RTS TO PAY THE COSTS OF THE PROCEEDINGS AND AUDIT. THERE WERE NO OTHER FINANCIAL CONSEQUENCES OR

SANCTIONS.

Resolution: Order

Resolution Date: 07/13/2018

Sanctions Ordered:

Other Sanctions Ordered: FINMA WILL APPOINT AN EXTERNAL AUDITOR TO REVIEW CORRECTIVE

MEASURES ALREADY IMPLEMENTED BY RBZ AND RTS, AND FINMA ORDERED RBZ AND RTS TO PAY THE COSTS OF THE PROCEEDINGS AND

AUDIT. THERE WERE NO OTHER FINANCIAL CONSEQUENCES OR

SANCTIONS. ROTHSCHILD INC. DOES NOT CONDUCT BUSINESS

ACTIVITIES WITH RBZ AND RTS. AND THESE SANCTIONS DO NOT PERTAIN

TO ROTHSCHILD INC.



Sanction Details: FINMA WILL APPOINT AN EXTERNAL AUDITOR TO REVIEW CORRECTIVE

> MEASURES ALREADY IMPLEMENTED BY RBZ AND RTS, AND FINMA ORDERED RBZ AND RTS TO PAY THE COSTS OF THE PROCEEDINGS AND

AUDIT. THERE WERE NO OTHER FINANCIAL CONSEQUENCES OR

SANCTIONS.

Firm Statement SEE ABOVE.

Reporting Source: Firm

Affiliate: ROTHSCHILD TRUST (SWITZERLAND) LTD.

Current Status: Final

Allegations: FINMA FOUND THAT RBZ AND RTS, FOREIGN AFFILIATES OF ROTHSCHILD

> INC., VIOLATED SWISS ANTI-MONEY LAUNDERING LAWS IN RELATION TO BUSINESS RELATIONSHIPS AND TRANSACTIONS INVOLVING A MALAYSIAN SOVEREIGN WEALTH FUND. ROTHSCHILD INC. DOES NOT CONDUCT

> BUSINESS ACTIVITIES WITH RBZ AND RTS, AND ROTHSCHILD INC. HAD NO

INVOLVEMENT IN ANY OF THE FOREGOING MATTERS.

SWISS FINANCIAL MARKET SUPERVISORY AUTHORITY (FINMA) Initiated By:

Date Initiated: 01/01/2016

Docket/Case Number: NA

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other

Other Sanction(s)/Relief

Sought:

FINMA WILL APPOINT AN EXTERNAL AUDITOR TO REVIEW CORRECTIVE MEASURES ALREADY IMPLEMENTED BY ROTHSCHILD BANK AG ("RBZ") AND ROTHSCHILD TRUST (SWITZERLAND) LTD. ("RTS"), AND FINMA ORDERED RBZ AND RTS TO PAY THE COSTS OF THE PROCEEDINGS AND AUDIT. THERE WERE NO OTHER FINANCIAL CONSEQUENCES OR

SANCTIONS.

Resolution: Order

Resolution Date: 07/13/2018

Sanctions Ordered:

Other Sanctions Ordered: FINMA WILL APPOINT AN EXTERNAL AUDITOR TO REVIEW CORRECTIVE

MEASURES ALREADY IMPLEMENTED BY RBZ AND RTS, AND FINMA

ORDERED RBZ AND RTS TO PAY THE COSTS OF THE PROCEEDINGS AND



AUDIT. THERE WERE NO OTHER FINANCIAL CONSEQUENCES OR SANCTIONS. ROTHSCHILD INC. DOES NOT CONDUCT BUSINESS

ACTIVITIES WITH RBZ AND RTS, AND THESE SANCTIONS DO NOT PERTAIN

TO ROTHSCHILD INC.

Sanction Details: FINMA WILL APPOINT AN EXTERNAL AUDITOR TO REVIEW CORRECTIVE

MEASURES ALREADY IMPLEMENTED BY RBZ AND RTS, AND FINMA ORDERED RBZ AND RTS TO PAY THE COSTS OF THE PROCEEDINGS AND

AUDIT. THERE WERE NO OTHER FINANCIAL CONSEQUENCES OR

SANCTIONS.

Firm Statement SEE ABOVE.

Disclosure 2 of 2

Reporting Source: Firm

Affiliate: ROTHSCHILD BANK AG

Current Status: Final

Allegations: ON JUNE 3, 2015, ROTHSCHILD BANK AG ("ROTHSCHILD BANK"), A

FOREIGN AFFILIATE OF ROTHSCHILD INC., ENTERED INTO A NON-PROSECUTION AGREEMENT (THE "AGREEMENT") WITH THE U.S. DEPARTMENT OF JUSTICE, TAX DIVISION (THE "DOJ") PURSUANT TO CATEGORY 2 OF THE DOJ'S PROGRAM FOR NON-PROSECUTION AGREEMENTS OR NON-TARGET LETTERS FOR SWISS BANKS, AS ANNOUNCED ON AUGUST 29, 2013. PURSUANT TO THE AGREEMENT,

ROTHSCHILD BANK AGREED TO PAY A PENALTY TO THE DOJ IN EXCHANGE FOR THE DOJ'S AGREEMENT NOT TO PROSECUTE ROTHSCHILD BANK WITH RESPECT TO CERTAIN TAX-RELATED OFFENSES PERTAINING TO SWISS BANKING ACTIVITIES INVOLVING U.S. RELATED ACCOUNTS. ROTHSCHILD INC. DOES NOT CONDUCT BUSINESS ACTIVITIES WITH ROTHSCHILD BANK. AND ROTHSCHILD INC. HAD NO INVOLVEMENT IN ANY

OF THE FOREGOING MATTERS.

Initiated By: UNITED STATES DEPARTMENT OF JUSTICE, TAX DIVISION

Date Initiated: 12/23/2013

Docket/Case Number: NA

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

Other Product Type(s):

Principal Sanction(s)/Relief O

Sought:

Other



Other Sanction(s)/Relief

Sought:

MONETARY PENALTY

Resolution: Settled

Resolution Date: 06/03/2015

Sanctions Ordered: Monetary/Fine \$11,510,000.00

Other Sanctions Ordered:

Sanction Details: PURSUANT TO A NON-PROSECUTION AGREEMENT, ROTHSCHILD BANK AG

AGREED TO PAY A PENALTY TO THE U.S. DEPARTMENT OF JUSTICE, TAX

DIVISION, AND SUCH PENALTY HAS BEEN PAID.

Firm Statement THIS MATTER WAS SETTLED PURSUANT TO A NON-PROSECUTION

AGREEMENT DATED JUNE 3, 2015.

End of Report



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