

BrokerCheck Report

OLD MUTUAL INVESTMENT PARTNERS

CRD# 44916

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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.

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Thank you for using FINRA BrokerCheck.



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



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



OLD MUTUAL INVESTMENT PARTNERS

CRD# 44916

SEC# 8-50875

Main Office Location

200 CLARENDON STREET
53RD FLOOR
BOSTON, MA 02116

Mailing Address

200 CLARENDON STREET
53RD FLOOR
BOSTON, MA 02116

Business Telephone Number

617-369-7300

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 other types of legal formation.

This firm was formed in Pennsylvania on 12/18/1997.

Its fiscal year ends in December.

Firm History

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

Firm Operations

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

Disclosure Events

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

Are there events disclosed about this firm? **No**

The number of disclosures from non-registered control affiliates is 3

Registration Withdrawal Information

This section provides information relating to the date the brokerage firm ceased doing business and the firm's financial obligations to customers or other brokerage firms.



Date firm ceased business: 12/31/2013

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

Firm Profile

This firm is classified as a other types of legal formation.

This firm was formed in Pennsylvania on 12/18/1997.

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.

OLD MUTUAL INVESTMENT PARTNERS

Doing business as OLD MUTUAL INVESTMENT PARTNERS

CRD# 44916

SEC# 8-50875

Main Office Location

200 CLARENDON STREET
53RD FLOOR
BOSTON, MA 02116

Mailing Address

200 CLARENDON STREET
53RD FLOOR
BOSTON, MA 02116

Business Telephone Number

617-369-7300

Other Names of this Firm

Name	Where is it used
PBHG FUND DISTRIBUTORS	AK, AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, HI, IA, ID, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, PR, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI,

WV, WY



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): OLD MUTUAL CAPITAL
131405

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

Position SHAREHOLDER

Position Start Date 07/2004

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): DILLON, BRIAN CHRISTOPHER
2352372

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

Position SENIOR VICE PRESIDENT, CHIEF COMPLIANCE OFFICER, TRUSTEE

Position Start Date 08/2009

Percentage of Ownership Less than 5%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): GIBSON, LINDA TILTON
1754883

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

Position TRUSTEE

Firm Profile



Direct Owners and Executive Officers (continued)

Position Start Date 05/2011

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): MCLAIN, THOMAS M
5976489

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

Position CHIEF EXECUTIVE OFFICER, PRESIDENT, TRUSTEE

Position Start Date 02/2012

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):	OLD MUTUAL (US) HOLDINGS INC.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	OLD MUTUAL CAPITAL, LLC
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	05/2004
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	Yes

Legal Name & CRD# (if any):	OLD MUTUAL PLC
Is this a domestic or foreign entity or an individual?	Foreign Entity
Company through which indirect ownership is established	OM GROUP (UK) LTD.
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	01/2003
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):	OM GROUP (UK) LTD.
Is this a domestic or foreign entity or an individual?	Foreign Entity

Firm Profile



Indirect Owners (continued)

Company through which indirect ownership is established	OLD MUTUAL (US) HOLDINGS INC.
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	01/2003
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

Firm History

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

No information reported.



Firm Operations



Registrations

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

This firm is no longer registered.

The firm's registration was from 06/02/1998 to 02/21/2014.



Firm Operations

Types of Business

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

This firm currently conducts 4 types of businesses.

Types of Business

Mutual fund underwriter or sponsor
Mutual fund retailer
Private placements of securities
Other - THE FIRM IS AUTHORIZED TO PROVIDE MARKETING SUPPORT FOR EXCHANGE TRADED CLOSED-END FUNDS AND PRIVATE INVESTMENT COMPANIES THAT ARE PRIMARILY MANAGED BY AFFILIATED INVESTMENT ADVISERS. THE FIRM IS ALSO AUTHORIZED TO UNDERWRITE AND SPONSOR MUTUAL FUNDS AND SELL VARIABLE ANNUITY PRODUCTS ALTHOUGH IT DOES NOT DO SO AT THIS TIME.

Other Types of Business

This firm does not effect transactions in commodities, commodity futures, or commodity options.
This firm does not engage in other non-securities business.

Non-Securities Business Description:

Firm Operations



Clearing Arrangements

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

Introducing Arrangements

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

Firm Operations

Industry Arrangements



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

Name:	SYMANTEC
Business Address:	350 ELLIS STREET MOUNTAIN VIEW, CA 94043
Effective Date:	08/21/2013
Description:	SYMANTEC PROVIDES ELECTRONIC STORAGE, REVIEW AND ARCHIVING SERVICES
Name:	SMARSH, INC.
Business Address:	921 WASHINGTON STREET, SUITE 540 PORTLAND, OR 97205
Effective Date:	08/28/2013
Description:	SMARSH, INC. PROVIDES ELECTRONIC STORAGE, REVIEW AND ARCHIVING SERVICES
Name:	LIVE OFFICE
Business Address:	2780 SKYPARK DR. SUITE 300 TORRANCE, CA 90505
Effective Date:	01/03/2012
Description:	LIVE OFFICE PROVIDES ELECTRONIC STORAGE, REVIEW AND ARCHIVING SERVICES
Name:	GLOBAL RELAY COMMUNICATIONS INC.
Business Address:	220 CAMBIE STREET, 2ND FLOOR VANCOUVER, BC, CANADA V6B2M9
Effective Date:	07/01/2012
Description:	GLOBAL RELAY PROVIDES ELECTRONIC STORAGE, REVIEW AND ARCHIVING SERVICES
Name:	DST SYSTEMS, INC
Business Address:	333 W 11TH STREET KANSAS CITY, MO 64105
Effective Date:	03/11/1995
Description:	DST SYSTEMS, INC. (DST) MAINTAINS CERTAIN HISTORICAL BOOKS

Firm Operations



Industry Arrangements (continued)

AND RECORDS ON BEHALF OF THE OM FUNDS. OLD MUTUAL INVESTMENT PARTNERS PREVIOUSLY SERVED AS THE DISTRIBUTOR FOR THE OM FUNDS. THE OM FUNDS ARE NO LONGER OPERATIONAL.

Name:	DELL, INC
Business Address:	11044 RESEARCH BLVD BUILDING C, FIFTH FLOOR AUSTIN, TX 78759
Effective Date:	12/01/2005
Description:	INSTANT EMAIL RETRIEVAL (FAILOVER)
Name:	IRON MOUNTAIN
Business Address:	15505 E HINSDALE CIRCLE ENGLEWOOD, CO 80260
Effective Date:	02/25/2005
Description:	ELECTRONIC OPTICAL AND BACK-UP SYSTEM TAPES AND HARD COPY ORIGINAL AND DUPLICATE FIRM OPERATIONAL DOCUMENTS

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.

HEITMAN HK LIMITED is under common control with the firm.

Business Address:	15/F LHT TOWER 31 QUEEN'S ROAD CENTRAL, HONG KONG
Effective Date:	12/06/2012
Foreign Entity:	Yes
Country:	HONG KONG
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

HEITMAN INTERNATIONAL REAL ESTATE SECURITIES HK LIMITED is under common control with the firm.

CRD #:	165930
Business Address:	15/F LHT TOWER 31 QUEEN'S ROAD CENTRAL, HONG KONG
Effective Date:	11/27/2012
Foreign Entity:	Yes
Country:	HONG KONG
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

Firm Operations



Organization Affiliates (continued)

ASHFIELD CAPITAL PARTNERS is under common control with the firm.

CRD #: 142580

Business Address: 750 BATTERY STREET
SUITE 600
SAN FRANCISCO, CA 94111

Effective Date: 02/02/2007

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

ANALYTIC INVESTORS, LLC is under common control with the firm.

CRD #: 104963

Business Address: 555 WEST FIFTH STREET
50TH FLOOR
LOS ANGELES, CA 90013

Effective Date: 12/18/1997

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMET PARTERS BY THEIR ULTIMATE OWNER OLD MUTUAL PLC.

OLD MUTUAL ASSET MAAGEMENT INTERNATIONAL, LTD. is under common control with the firm.

Business Address: 2 LAMBETH HILL
LONDON, UK EC4V 4GG

Effective Date: 04/30/2010

Foreign Entity: Yes

Firm Operations



Organization Affiliates (continued)

Country:	UK
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

HEITMAN INTERNATIONAL REAL ESTATE SECURITIES PTY. LIMITED is under common control with the firm.

Business Address:	300 COLLINS STREET, LEVEL 7 MELBOURNE, AUSTRALIA, VIC 3000
Effective Date:	07/06/2010
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

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

Business Address:	ONE TOWER BRIDGE 100 FRONT STREET, SUITE 1230 WEST CONSHOHOCKEN, PA 19428
Effective Date:	10/01/2010
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

SKANDIA PORTFOLIO MANAGEMENT GMBH is under common control with the firm.

Business Address:	KAISERIN-AUGUSTA-ALLEE 108
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Firm Operations



Organization Affiliates (continued)

	BERLIN, GERMANY D-10553
Effective Date:	01/26/2006
Foreign Entity:	Yes
Country:	GERMANY
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

SKANDIA MULTIFUNDS LTD is under common control with the firm.

Business Address:	SKANDIA HOUSE PORTLAND TERRACE SOUTHAMPTON, ENGLAND SO14 7EJ
Effective Date:	01/26/2006
Foreign Entity:	Yes
Country:	ENGLAND
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

SKANDIA INVESTMENT MANAGEMENT LTD is under common control with the firm.

Business Address:	SKANDIA HOUSE PORTLAND TERRACE SOUTHAMPTON, ENGLAND SO14 7EJ
Effective Date:	01/26/2009
Foreign Entity:	Yes
Country:	ENGLAND
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS

Firm Operations



Organization Affiliates (continued)

BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

SKANDIA INVEST SERVICE GMBH is under common control with the firm.

Business Address: POSTFACH 10
WILDPRETMARKT 2-4 A-1013
VIENNA, AUSTRIA

Effective Date: 01/26/2006

Foreign Entity: Yes

Country: AUSTRIA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS
BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

SKANDIA GLOBAL FUNDS MARKETING LTD is under common control with the firm.

Business Address: REGUS HOUSE - 4TH FLOOR
HARCOURT ROAD
DUBLIN, IRELAND

Effective Date: 01/26/2006

Foreign Entity: Yes

Country: IRELAND

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS
BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

SKANDIA FUND MANAGEMENT (IRELAND) LTD is under common control with the firm.

Business Address: REGUS HOUSE - 4TH FLOOR
HARCOURT ROAD
DUBLIN, IRELAND

Effective Date: 01/26/2006

Foreign Entity: Yes

Firm Operations



Organization Affiliates (continued)

Country:	IRELAND
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

SELESTIA INVESTMENTS LTD is under common control with the firm.

Business Address:	POLK HOUSE, 26-30 UPPER MARLBOROUGH ROAD ST. ALBANS HERTFORDSHIRE, ENGLAND
Effective Date:	09/26/2000
Foreign Entity:	Yes
Country:	ENGLAND
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL GLOBAL INDEX TRACKERS (PROPRIETARY) LIMITED is under common control with the firm.

CRD #:	148959
Business Address:	144 KATHERINE STREET GRAYSTON RIDGE OFFICE PARK, FIRST FLOOR BLOCK A SANDTON, SOUTH AFRICA 2196
Effective Date:	03/12/2009
Foreign Entity:	Yes
Country:	SOUTH AFRICA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

Firm Operations



Organization Affiliates (continued)

OMIGSA MANAGEMENT COMPANY LIMITED is under common control with the firm.

Business Address:	9-11 MOUNT ST LR CO DUBLIN, IRELAND
Effective Date:	09/26/2000
Foreign Entity:	Yes
Country:	IRELAND
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL UNIT TRUST MANAGERS LIMITED is under common control with the firm.

Business Address:	MUTUAL PARK JAN SMUTS DRIVE PINELANDS, SOUTH AFRICA 7405
Effective Date:	09/26/2000
Foreign Entity:	Yes
Country:	SOUTH AFRICA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL UNIT TRUST MANAGEMENT CO. (PRIVATE) LIMITED is under common control with the firm.

Business Address:	PO BOX 70 HARARE, ZIMBABWE
Effective Date:	09/26/2000
Foreign Entity:	Yes
Country:	ZIMBABWE
Securities Activities:	No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL UNIT TRUST MANAGEMENT CO. (NAMIBIA) LIMITED is under common control with the firm.

Business Address: 1ST FLOOR MUTUALPLATZ BUILDIGN
POSTAL STREET MALL
WINDHOEK, NAMIBIA

Effective Date: 09/26/2000

Foreign Entity: Yes

Country: NAMIBIA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL INVESTMENT ADMINISTRATORS (PTY) LTD is under common control with the firm.

Business Address: MUTUAL PARK
JAN SMUTS DRIVE
PINELANDS, SOUTH AFRICA 7405

Effective Date: 09/26/2000

Foreign Entity: Yes

Country: SOUTH AFRICA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL INVESTMENT SERVICES (PTY) LTD is under common control with the firm.

Business Address: 97 GRAYSTON DRIVE
CNR OF WEST ROAD SOUTH SANDTON
JOHANNESBURG, SOUTH AFRICA

Firm Operations



Organization Affiliates (continued)

Effective Date: 09/26/2000

Foreign Entity: Yes

Country: SOUTH AFRICA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL INVESTMENT SERVICES (KENYA) LIMITED is under common control with the firm.

Business Address: MUTUAL BUILDING
2ND FLOOR, KIMATHI STREET
NAIROBI, KENYA

Effective Date: 09/26/2000

Foreign Entity: Yes

Country: KENYA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL INVESTMENT GROUP (SOUTH AFRICA) (PTY) LIMITED is under common control with the firm.

Business Address: MUTUAL PARK
JAN SMUTS DRIVE
PINELANDS, SOUTH AFRICA 7405

Effective Date: 09/26/2000

Foreign Entity: Yes

Country: SOUTH AFRICA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

Firm Operations



Organization Affiliates (continued)

OLD MUTUAL INTERNATIONAL (GUERNSEY) LIMITED is under common control with the firm.

Business Address: FAIRBAIN HOUSE
PO BOX 121 ROHAIS
ST. PETER PORT, GUERNSEY GY1

Effective Date: 09/26/2000

Foreign Entity: Yes

Country: GUERNSEY

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL FUND MANAGERS LIMITED is under common control with the firm.

Business Address: 80 CHEAPSIDE
5TH FLOOR
LONDON, ENGLAND EC2V 6EE

Effective Date: 09/26/2000

Foreign Entity: Yes

Country: ENGLAND

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL FUND MANAGERS (GUERNSEY) LIMITED is under common control with the firm.

Business Address: FAIRBAIRN HOUSE
PO BOX 121 ROHAIS
ST. PETER PORT, GUERNSEY GY1 3HE

Effective Date: 09/26/2000

Foreign Entity: Yes

Country: GUERNSEY

Firm Operations



Organization Affiliates (continued)

Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL ASSET MANAGERS (PRIVATE) LIMITED is under common control with the firm.

Business Address:	100 THE CHASE EMERALD VIEW HARARE, ZIMBABWE
Effective Date:	09/26/2000
Foreign Entity:	Yes
Country:	ZIMBABWE
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL INVESTMENT GROUP (NAMIBIA) (PTY) LIMITED is under common control with the firm.

Business Address:	INDEPENDANT AVENUE 299 OLD MUTUAL BUILDING WINDHOEK, NAMIBIA
Effective Date:	09/26/2000
Foreign Entity:	Yes
Country:	NAMIBIA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL ASSET MANAGERS (KENYA) LIMITED is under common control with the firm.

Business Address:	MUTUAL BUILDING 2ND FLOOR, KIMATHI STREET
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Firm Operations



Organization Affiliates (continued)

	NAIROBI, KENYA
Effective Date:	09/26/2000
Foreign Entity:	Yes
Country:	KENYA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL ASSET MANAGERS (EAST AFRICA) is under common control with the firm.

Business Address:	MUTUAL BUILDING 2ND FLOOR, KIMATHI STREET NAIROBI, KENYA
Effective Date:	09/26/2000
Foreign Entity:	Yes
Country:	KENYA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL ASSET MANAGERS (BERMUDA) LIMITED is under common control with the firm.

Business Address:	22 CHURCH STREET PHASE II, 4TH FLOOR HAMILTON, BERMUDA HMII
Effective Date:	09/26/2000
Foreign Entity:	Yes
Country:	BERMUDA
Securities Activities:	No
Investment Advisory Activities:	Yes

Firm Operations



Organization Affiliates (continued)

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL FINANCE (PTY) LTD. is under common control with the firm.

Business Address: MUTUAL PARK
JAN SMUTS DRIVE
PINELANDS, SOUTH AFRICA 7405

Effective Date: 09/26/2000

Foreign Entity: Yes

Country: SOUTH AFRICA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

MUTUAL AND FEDERAL RISK FINANCING LTD is under common control with the firm.

Business Address: MUTUAL AND FEDERAL CENTRE
75 PRESIDENT STREET
JOHANNESBURG, SOUTH AFRICA 2001

Effective Date: 09/26/2000

Foreign Entity: Yes

Country: SOUTH AFRICA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

MARRIOTT ASSET MANAGEMENT PTY is under common control with the firm.

Business Address: MARRIOTT AT KINGSMEAD
KINGSMEAD OFFICE PARK
DURBAN, SOUTH AFRICA 4001

Effective Date: 09/26/2000

Foreign Entity: Yes

Firm Operations



Organization Affiliates (continued)

Country:	SOUTH AFRICA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

COMMUNITY GROWTH MANAGEMENT COMPANY LTD is under common control with the firm.

Business Address:	MUTUALPARK JAN SMUTS DRIVE PINELANDS, SOUTH AFRICA 7405
Effective Date:	09/26/2000
Foreign Entity:	Yes
Country:	SOUTH AFRICA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

NEDBANK PRIVATE WEALTH (PTY) LTD is under common control with the firm.

Business Address:	135 RIVONIA ROAD SANDTON, SOUTH AFRICA 2146
Effective Date:	01/01/1996
Foreign Entity:	Yes
Country:	SOUTH AFRICA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

HEITMAN INTERNATIONAL SARL is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: 2, RUE EDMUND REUTER
COTERN, LUXEMBOURG L-5326

Effective Date: 09/25/2003

Foreign Entity: Yes

Country: LUXEMBOURG

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

HEITMAN INTERNATIONAL REAL ESTATE SECURITIES GMBH is under common control with the firm.

CRD #: 143681

Business Address: ROSSMARKT 14 D-60313
FRANKFURT AMMAIN, GERMANY

Effective Date: 08/17/2006

Foreign Entity: Yes

Country: GERMANY

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

ACADIAN ASSET MANAGEMENT (UK) LIMITED is under common control with the firm.

Business Address: 2 LAMBETH HILL
LONDON, ENGLAND EC4V 4GG

Effective Date: 03/08/2007

Foreign Entity: Yes

Country: ENGLAND AND WALES

Securities Activities: No

Investment Advisory Activities: Yes

Firm Operations



Organization Affiliates (continued)

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

ROGGE GLOBAL PARTNERS ASIA PTE LTD is under common control with the firm.

Business Address: SION HALL 56 VICTORIA ENBANKMENT
LONDON, ENGLAND EC4Y ODZ

Effective Date: 06/04/2007

Foreign Entity: Yes

Country: SINGAPORE

Securities Activities: No

Investment Advisory Activities: Yes

Description: INDIRECT WHOLLY OWNED SUB OF OMUSH, WHICH IS A DIRECT WHOLLY OWNED SUB OF OLD MUTUAL PLC

TOKIO MARINE ROGGE ASSET MANAGEMENT LIMITED (UK) is under common control with the firm.

Business Address: SION HALL 56 VICTORIA ENBANKMENT
LONDON, ENGLAND EC4Y ODZ

Effective Date: 09/30/2003

Foreign Entity: Yes

Country: ENGLAND AND WALES

Securities Activities: No

Investment Advisory Activities: Yes

Description: INDIRECT WHOLLY OWNED SUB OF OMUSH, WHICH IS A DIRECT WHOLLY OWNED SUB OF OLD MUTUAL PLC

SYFRETS SECURITIES (PTY) LTD is under common control with the firm.

Business Address: 97 GRAYSTON DRIVE CNR OF WEST ROAD
SOUTH SANDTON, JOHANNESBURG, SOUTH AFRICA

Effective Date: 01/26/2006

Foreign Entity: Yes

Country: SOUTH AFRICA

Firm Operations



Organization Affiliates (continued)

Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECT WHOLLY OWNED SUB OF OLD MUTUAL PLC

NEDGROUP SECURITIES (PTY) LIMITED is under common control with the firm.

Business Address:	135 RIVONIA ROAD SANDOWN, SOUTH AFRICA 2196
Effective Date:	08/30/2008
Foreign Entity:	Yes
Country:	SOUTH AFRICA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

NEDCOR BANK NOMINEES LTD is under common control with the firm.

Business Address:	135 RIVONIA ROAD SANDOWN, SOUTH AFRICA 2196
Effective Date:	12/19/1998
Foreign Entity:	Yes
Country:	SOUTH AFRICA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

NEDBANK LIMITED is under common control with the firm.

Business Address:	135 RIVONIA ROAD SANDOWN, SOUTH AFRICA 2196
Effective Date:	01/01/1990

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	Yes
Country:	SOUTH AFRICA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

HEITMAN UK LIMITED is under common control with the firm.

Business Address:	NO 6 HENRIETTA STREET LONDON, ENGLAND
Effective Date:	01/20/2009
Foreign Entity:	Yes
Country:	ENGLAND AND WALES
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

NEDGROUP PRIVATE WEALTH STOCKBROKERS PTY LTD is under common control with the firm.

Business Address:	135 RIVONIA ROAD SANDTON, SOUTH AFRICA 2196
Effective Date:	01/01/1996
Foreign Entity:	Yes
Country:	SOUTH AFRICA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

HEITMAN INTERNATIONAL LLC is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: 191 N. WACKER DRIVE
CHICAGO, IL 60606

Effective Date: 11/05/2004

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

ROGGE GLOBAL PARTNERS INC. is under common control with the firm.

CRD #: 146426

Business Address: 1720 POST RD E
WESTPORT, CT 06880

Effective Date: 03/18/2008

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: AN IN-DIRECT, WHOLLY-OWNED SUBSIDIARY OF OLD MUTUAL (US) HOLDINGS INC., WHICH IN TURN IS A WHOLLY-OWNED SUBSIDIARY OF OLD MUTUAL PLC.

WPS CAPITAL MANAGEMENT LLC is under common control with the firm.

Business Address: 232 CAUSEWAY DR
WRIGHTSVILLE BEACH, NC 28480

Effective Date: 01/01/2006

Foreign Entity: No

Country:

Securities Activities: No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities:	Yes
Description:	A DIRECT, WHOLLY-OWNED SUBSIDIARY OF OLD MUTUAL (US) HOLDINGS INC., WHICH IN TURN IS A WHOLLY-OWNED SUBSIDIARY OF OLD MUTUAL PLC.

SKANDIA GLOBAL FUNDS (ASIA PACIFIC) LIMITED is under common control with the firm.

Business Address:	28/F NO. 3 LOCKHART ROAD HONG KONG, HONG KONG
Effective Date:	01/26/2006
Foreign Entity:	Yes
Country:	HONG KONG
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	A WHOLLY-OWNED SUBSIDIARY OF OLD MUTUAL PLC.

ACADIAN ASSET MANAGEMENT (AUSTRALIA) LIMITED is under common control with the firm.

Business Address:	LEVEL 40 AUSTRALIA SQUARE 265-278 GEORGE ST. SYDNEY, AUSTRALIA NSW 2000
Effective Date:	05/12/2005
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

COPPER ROCK CAPITAL PARTNERS is under common control with the firm.

CRD #:	134176
Business Address:	200 CLARENDON STREET 51ST FLOOR

Firm Operations



Organization Affiliates (continued)

BOSTON, MA 02116

Effective Date: 02/09/2006

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

INVESTMENT COUNSELORS OF MARYLAND is under common control with the firm.

CRD #: 116379

Business Address: 803 CATHEDRAL STREET
BALTIMORE, MD 21201

Effective Date: 08/15/2001

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

ACADIAN ASSET MANAGEMENT (SINGAPORE) PTE. LTD. is under common control with the firm.

Business Address: 391A ORCHARD ROAD #13-04
NGEE ANN CITY, SINGAPORE 238873

Effective Date: 06/30/1999

Foreign Entity: Yes

Country: SINGAPORE

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS

Firm Operations



Organization Affiliates (continued)

BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL ASSET MANAGERS (UK) LTD is under common control with the firm.

Business Address: 2 LAMBETH HILL
LONDON, UNITED KINGDOM EC4P 4WR

Effective Date: 09/26/2000

Foreign Entity: Yes

Country: UNITED KINGDOM

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

OLD MUTUAL INVESTMENT GROUP (SOUTH AFRICA) (PTY.) LTD is under common control with the firm.

Business Address: MUTUALPARK JAN SMUTS DARIVE
PINELANDS 7405
CAPE TOWN, SOUTH AFRICA

Effective Date: 09/26/2000

Foreign Entity: Yes

Country: SOUTH AFRICA

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

THOMPSON SIEGEL & WALMSLEY LLC is under common control with the firm.

CRD #: 105726

Business Address: 6806 PARAGON PLACE
RICHMOND, VA 23230

Effective Date: 12/18/1997

Foreign Entity: No

Country:

Firm Operations



Organization Affiliates (continued)

Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	A DIRECT, WHOLLY-OWNED SUBSIDIARY OF OLD MUTUAL (US) HOLDINGS INC., WHICH IN TURN IS A WHOLLY-OWNED SUBSIDIARY OF OLD MUTUAL PLC.

ROGGE GLOBAL PARTNERS PLC is under common control with the firm.

CRD #:	105819
Business Address:	SION HALL 56 VICTORIA ENBANKMENT LONDON, ENGLAND EC4Y ODZ
Effective Date:	12/18/1997
Foreign Entity:	Yes
Country:	ENGLAND
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	A DIRECT, WHOLLY-OWNED SUBSIDIARY OF UAM UK, HOLDINGS INC., WHICH IN TURN IS A DIRECT, WHOLLY-OWNED SUBSIDIARY OF OLD MUTUAL (US) HOLDINGS INC., WHICH IN TURN IS A WHOLLY-OWNED SUBSIDIARY OF OLD MUTUAL PLC.

HEITMAN SECURITIES LLC is under common control with the firm.

CRD #:	13620
Business Address:	191 N. WACKER DRIVE CHICAGO, IL 60606
Effective Date:	12/18/1997
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS

Firm Operations



Organization Affiliates (continued)

BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

HEITMAN REAL ESTATE SECURITIES LLC is under common control with the firm.

CRD #: 107134

Business Address: 191 N. WACKER DRIVE
CHICAGO, IL 60606

Effective Date: 12/18/1997

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS
BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

HEITMAN INSTITUTIONAL ADVISORS is under common control with the firm.

CRD #: 105492

Business Address: 191 N. WACKER DRIVE
CHICAGO, IL 60606

Effective Date: 12/18/1997

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS
BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

HEITMAN CAPITAL MANAGEMENT LLC is under common control with the firm.

CRD #: 105480

Business Address: 191 N. WACKER DRIVE
SUITE 2500
CHICAGO, IL 60606

Effective Date: 12/18/1997

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

THE CAMPBELL GROUP, LLC is under common control with the firm.

CRD #:	111944
Business Address:	ONE SOUTH WEST COLUMBIA SUITE 1720 PORTLAND, OR 97258
Effective Date:	12/18/1997
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	A DIRECT WHOLLY-OWNED SUBSIDIARY OF OLD MUTUAL (US) HOLDINGS INC., WHICH IN TURN IS A WHOLLY-OWNED SUBSIDIARY OF OLD MUTUAL PLC.

BARROW, HANLEY, MEWHINNEY & STRAUSS, LLC is under common control with the firm.

CRD #:	105519
Business Address:	JPMORGAN CHASE TOWER 2200 ROSS AVENUE, 31ST FLOOR DALLAS, TX 75201
Effective Date:	12/18/1997
Foreign Entity:	No
Country:	
Securities Activities:	No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

ACADIAN ASSET MANAGEMENT is under common control with the firm.

CRD #:	106609
Business Address:	ONE POST OFFICE SQUARE 20TH FLOOR BOSTON, MA 02109
Effective Date:	12/18/1997
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH OLD MUTUAL INVESTMENT PARTNERS BY THEIR ULTIMATE OWNER, OLD MUTUAL PLC.

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 for Non-Registered Control Affiliates



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

	Pending	Final	On Appeal
Regulatory Event	0	3	0



Disclosure Event Details

Regulatory - Final

Disclosure 1 of 3

Reporting Source:	Firm
Affiliate:	OLD MUTUAL FUND MANAGERS LIMITED LTD
Current Status:	Final
Allegations:	IMRO ALLEGED THAT OMFM FAILED TO TAKE ALL REASONABLE STEPS TO EXERCISE DUE DILIGENCE TO AVOID THE INCORRECT PRICING OF ASSETS AND TRUSTS UNDER ITS MANAGEMENT.
Initiated By:	INVESTMENT MANAGEMENT REGULATORY ORGANIZATION (IMRO)(UK)
Date Initiated:	01/28/1999
Docket/Case Number:	
Principal Product Type:	Unit Investment Trust(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	01/28/1999
Sanctions Ordered:	Monetary/Fine \$28,751.00
Other Sanctions Ordered:	PAYMENT OF 62,000 POUNDS TO FUNDS AND CUSTOMERS. PAYMENT OF IMRO'S COSTS OF 20,731 POUNDS.
Sanction Details:	THE AMOUNT WAS PAID IN A TIMELY FASHION.
Firm Statement	THE ACTION IS SETTLED AND FINAL.

Disclosure 2 of 3

Reporting Source:	Firm
Affiliate:	OLD MUTUAL FUND MANAGERS LIMITED
Current Status:	Final



Allegations:	IMRO ALLEGED THAT OMFM FAILED TO HAVE SUFFICIENT RESOURCES IN 1993 AND THAT IT FAILED TO BANK CLIENT MONEY IN A TIMELY FASHION.
Initiated By:	INVESTMENT MANAGEMENT REGULATORY ORGANIZATION (IMRO) (UK)
Date Initiated:	01/13/1994
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:	Decision
Resolution Date:	01/13/1994
Sanctions Ordered:	Monetary/Fine \$28,751.00
Other Sanctions Ordered:	PAYMENT OF IMRO'S COSTS OF 17,000 POUNDS. DISADVANTAGED INVESTORS WERE COMPENSATED.
Sanction Details:	THE AMOUNT WAS PAID IN A TIMELY FASHION.
Firm Statement	FINAL

Disclosure 3 of 3

Reporting Source:	Firm
Affiliate:	OLD MUTUAL FUND MANAGERS LIMITED
Current Status:	Final
Allegations:	IMRO ALLEGED THAT THE FIRM BREACHED RULES RELATING TO COMPLIANCE ARRANGEMENTS AND THE BANKING OF CLIENT MONEY AND THE FIRM FAILED TO HAVE ADEQUATE PROCEDURES IN PLACE.
Initiated By:	INVESTMENT MANAGEMENT REGULATORY ORGANIZATION (IMRO) (UK)
Date Initiated:	09/13/2000
Docket/Case Number:	
Principal Product Type:	Unit Investment Trust(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:	09/13/2000
Sanctions Ordered:	Monetary/Fine \$43,137.00
Other Sanctions Ordered:	THE FIRM WAS ORDERED TO PAY 17,000 POUNDS.
Sanction Details:	THE AMOUNT WAS PAID IN A TIMELY FASHION.
Firm Statement	THE ACTION IS FINAL

End of Report



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