

## BrokerCheck Report

# THE ROBINSON-HUMPHREY COMPANY, LLC

CRD# 723

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



For additional information about the contents of this report, please refer to the User Guidance or [www.finra.org/brokercheck](http://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).



## THE ROBINSON-HUMPHREY COMPANY, LLC

CRD# 723

SEC# 8-27190

### Main Office Location

3333 PEACHTREE ROAD N.E.  
ATLANTA, GA 30326-1055

### Mailing Address

REGISTRATION DEPARTMENT  
333 WEST 34TH STREET - 7TH FLOOR  
NEW YORK, NY 10001

### Business Telephone Number

212-615-9524

## Report Summary for this Firm

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

### Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Delaware on 09/03/1997.

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? **Yes**

The following types of disclosures have been reported:

Type	Count
Regulatory Event	14
Arbitration	11

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

## 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:** 01/02/2002

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



## Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Delaware on 09/03/1997.

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.

**THE ROBINSON-HUMPHREY COMPANY, LLC**

**Doing business as THE ROBINSON-HUMPHREY COMPANY, LLC**

**CRD#** 723

**SEC#** 8-27190

### Main Office Location

3333 PEACHTREE ROAD N.E.  
ATLANTA, GA 30326-1055

### Mailing Address

REGISTRATION DEPARTMENT  
333 WEST 34TH STREET - 7TH FLOOR  
NEW YORK, NY 10001

### Business Telephone Number

212-615-9524



## Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

### Direct Owners and Executive Officers

<b>Legal Name &amp; CRD# (if any):</b>	SALOMON SMITH BARNEY INC. 07059
<b>Is this a domestic or foreign entity or an individual?</b>	Domestic Entity
<b>Position</b>	OWNER
<b>Position Start Date</b>	09/1998
<b>Percentage of Ownership</b>	75% or more
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	Yes

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<b>Legal Name &amp; CRD# (if any):</b>	CLEMENTS, GEORGE BUNCH 48542
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	SENIOR VICE PRESIDENT
<b>Position Start Date</b>	05/1982
<b>Percentage of Ownership</b>	Less than 5%
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	DAY, MICHAEL JOSEPH 2344142
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	CHIEF FINANCIAL OFFICER

## Firm Profile



### Direct Owners and Executive Officers (continued)

**Position Start Date** 07/2001

**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

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**Legal Name & CRD# (if any):** JANIAK, A.RICHARD RICHARD JR

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

**Position** CHIEF EXECUTIVE OFFICER AND DIRECTOR

**Position Start Date** 11/2001

**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

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**Legal Name & CRD# (if any):** KUKLENSKI, KIRBY JUDE

732315

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

**Position** EXECUTIVE VICE PRESIDENT

**Position Start Date** 05/1997

**Percentage of Ownership** Less than 5%

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

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** MORGAN, MICHELLE MARIE

## Firm Profile



### Direct Owners and Executive Officers (continued)

2413332

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

**Position** CROP

**Position Start Date** 05/2001

**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):** SORDIPREITE, VIRGINIA A  
2007039

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

**Position** CHIEF COMPLIANCE OFFICER

**Position Start Date** 07/2001

**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):** STIDHAM, REESE MCGREGOR III  
808174

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

**Position** SENIOR VICE PRESIDENT

**Position Start Date** 05/1993

**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?** Yes

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** SWIFT, HENRY WOODRUFF JR  
441328

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

**Position** SENIOR VICE PRESIDENT

**Position Start Date** 03/1988

**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

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**Legal Name & CRD# (if any):** TRAYNOR, FRANCIS MOFFITT JR  
449006

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

**Position** SENIOR VICE PRESIDENT

**Position Start Date** 05/1982

**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

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**Legal Name & CRD# (if any):** ZIMMERMAN, JOHN CONRAD JR  
476714

Firm Profile



Direct Owners and Executive Officers (continued)

Is this a domestic or foreign entity or an individual?	Individual
Position	SENIOR VICE PRESIDENT
Position Start Date	03/1988
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

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## Firm Profile

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

### Indirect Owners

<b>Legal Name &amp; CRD# (if any):</b>	CITIGROUP INC. (FORMERLY TRAVELERS GROUP INC.)
<b>Is this a domestic or foreign entity or an individual?</b>	Domestic Entity
<b>Company through which indirect ownership is established</b>	SALOMON SMITH BARNEY HOLDINGS INC. (SSBHI)
<b>Relationship to Direct Owner</b>	SOLE SHAREHOLDER
<b>Relationship Established</b>	11/1997
<b>Percentage of Ownership</b>	75% or more
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	SALOMON BROTHERS HOLDING COMPANY INC.
<b>Is this a domestic or foreign entity or an individual?</b>	Domestic Entity
<b>Company through which indirect ownership is established</b>	SALOMON SMITH BARNEY INC.
<b>Relationship to Direct Owner</b>	100% SHAREHOLDER
<b>Relationship Established</b>	09/1998
<b>Percentage of Ownership</b>	75% or more
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	SALOMON SMITH BARNEY HOLDINGS, INC.
<b>Is this a domestic or foreign entity or an individual?</b>	Domestic Entity

Firm Profile



Indirect Owners (continued)

Company through which indirect ownership is established	SALOMON BROTHERS HOLDING COMPANY, INC.
Relationship to Direct Owner	100% SHAREHOLDER
Relationship Established	09/1998
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

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## 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 10/16/1936 to 02/22/2002.**



## 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 12 types of businesses.**

#### Types of Business

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)
Mutual fund retailer
U S. government securities broker
Municipal securities broker
Broker or dealer selling variable life insurance or annuities
Broker or dealer selling oil and gas interests
Put and call broker or dealer or option writer
Investment advisory services
Broker or dealer selling tax shelters or limited partnerships in primary distributions
Broker or dealer selling tax shelters or limited partnerships in the secondary market

#### 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: 13B SBHU LIFE AGENCY INC. AND SUBSIDIARIES ENGAGE IN THE SALE OF VARIABLE ANNUITY CONTRACTS, VARIABLE LIFE INSURANCE AND OTHER INSURANCE PRODUCTS.

## 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 refer or introduce customers to other brokers and dealers.

<b>Name:</b>	SALOMON SMITH BARNEY INC.
<b>CRD #:</b>	7059
<b>Business Address:</b>	388 GREENWICH STREET NEW YORK, NY 10013
<b>Effective Date:</b>	07/31/1993
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF, AND CLEARS THROUGH, SALOMON SMITH BARNEY INC.

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## Firm Operations

### Industry Arrangements



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

**Name:** SALOMON SMITH BARNEY INC.  
**CRD #:** 7059  
**Business Address:** 388 GREENWICH STREET  
NEW YORK, NY 10013  
**Effective Date:** 07/31/1993  
**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF,  
AND CLEARS THROUGH, SALOMON SMITH BARNEY INC.

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

**Name:** SALOMON SMITH BARNEY INC.  
**CRD #:** 7059  
**Business Address:** 388 GREENWICH STREET  
NEW YORK, NY 10013  
**Effective Date:** 07/31/1993  
**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF,  
AND CLEARS THROUGH, SALOMON SMITH BARNEY INC.

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

**Name:** SALOMON SMITH BARNEY INC.  
**CRD #:** 7059  
**Business Address:** 388 GREENWICH STREET  
NEW YORK, NY 10013  
**Effective Date:** 07/31/1993  
**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF,  
AND CLEARS THROUGH, SALOMON SMITH BARNEY INC.

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**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.**

**SCHRODER POLSKA SP 20.0 is under common control with the firm.**

<b>Business Address:</b>	WARSAW CORPORATE CENTRE 3RD FLOOR UL EMILII PLATER 28, POLAND N/A
<b>Effective Date:</b>	05/01/2000
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	POLAND
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

**SCHRODER INTERNATIONAL MERCHANT BANKERS LIMITED is under common control with the firm.**

<b>Business Address:</b>	65 CHULIA STREET 47-01 OCBC CENTRE SINGAPORE, SINGAPORE 049513
<b>Effective Date:</b>	05/01/2000
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	SINGAPORE
<b>Securities Activities:</b>	Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### SCHRODERS AUSTRALIA LIMITED is under common control with the firm.

**Business Address:** LEVEL 9, 60 CUSTLOREAGH STREET  
SYDNEY, NSW, AUSTRALIA N/A

**Effective Date:** 05/01/2000

**Foreign Entity:** Yes

**Country:** AUSTRALIA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### J. HENRY SCHRODER (GUERNSEY) LIMITED is under common control with the firm.

**Business Address:** SARNIA HOUSE  
LE TRUCHOT  
ST. PETER PORT, GUERNSEY N/A

**Effective Date:** 05/01/2000

**Foreign Entity:** Yes

**Country:** GUERNSEY

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**SALOMON SMITH BARNEY CITI FUND MANAGEMENT LLC is under common control with the firm.**

**Business Address:** 388 GREENWICH STREET  
NEW YORK, NY 10013

**Effective Date:** 09/21/1999

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**SALOMON SMITH BARNEY CHINA LIMITED is under common control with the firm.**

**Business Address:** 8 CONNAUGHT PLACE  
20TH FLOOR  
VICTORIA, HONG KONG N/A

**Effective Date:** 09/01/1998

**Foreign Entity:** Yes

**Country:** HONG KONG

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITICORP MERCHANT BANK LIMITED is under common control with the firm.

**Business Address:** 74 INDEPENDENCE SQUARE  
PORT OF SPAIN, TRINADAD N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** TRINADAD

**Securities Activities:** No

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### INARCO INTERNATINAL BANK NV is under common control with the firm.

**Business Address:** ARULEX CENTER  
PUNTA BRABO  
ORANJESTAD, ARUBA N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** ARUBA

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**SALOMON SMITH BARNEY CITI FUND MANAGEMENT LLC is under common control with the firm.**

**Business Address:** 388 GREENWICH STREET  
NEW YORK, NY 10013

**Effective Date:** 09/21/1999

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**SALOMON SMITH BARNEY CHINA LIMITED is under common control with the firm.**

**Business Address:** 8 CONNAUGHT PLACE  
20TH FLOOR  
VICTORIA, HONG KONG N/A

**Effective Date:** 09/01/1998

**Foreign Entity:** Yes

**Country:** HONG KONG

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITICORP MERCHANT BANK LIMITED is under common control with the firm.

**Business Address:** 74 INDEPENDENCE SQUARE  
PORT OF SPAIN, TRINADAD N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** TRINADAD

**Securities Activities:** No

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### INARCO INTERNATINAL BANK NV is under common control with the firm.

**Business Address:** ARULEX CENTER  
PUNTA BRABO  
ORANJESTAD, ARUBA N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** ARUBA

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITICORP INVESTMENT BANK (THE NETHERLANDS) NV is under common control with the firm.**

**Business Address:** EUROPLAZE  
HOOGOORDDREEF 54B  
1101 BE AMSTERDAM, THE NETHERLANDS 20

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** THE NETHERLANDS

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITICORP CAPITAL MARKETS AUSTRALIA LIMITED is under common control with the firm.**

**Business Address:** 1 MARGARET STREET  
SYDNEY NSW, AUSTRALIA N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** AUSTRALIA

**Securities Activities:** Yes



## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK PRIVATKUNDEN AG is under common control with the firm.

**Business Address:** KASERNENSTRASSE 10  
DUSSELDORF, GERMANY N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** GERMANY

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK MEXICO, S.A. is under common control with the firm.

**Business Address:** GRUPO FINANCIERO CITIBANK  
PASEO DE LA REFORMA 390  
DISTRITO FEDERAL, MEXICO 06695

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** MEXICO

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK MALAYSIA (L) LIMITED is under common control with the firm.

**Business Address:** LEVEL 11 (F) MAIN OFFICE  
FINANCIAL PARK LABUAN JALAN  
LABUAN F.T., MALAYSIA 87000

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** MALAYSIA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK LIMITED is under common control with the firm.

**Business Address:** 1 MARGARET STREET  
SYDNEY NSW, AUSTRALIA N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** AUSTRALIA

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK INTERNATIONAL PLC is under common control with the firm.

**Business Address:** 336 STRAND  
LONDON, ENGLAND WC2R 1HB

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK INTERNATIONAL is under common control with the firm.

**Business Address:** 201 S. BISCAYNE BOULEVARD  
SUITE 3300  
MIAMI, FL 33131-4325

**Effective Date:** 10/08/1998

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK ESPANA S.A. is under common control with the firm.

**Business Address:** AVENIDA DE EUROPA 19  
ALCOBENDAS, MADRID, SPAIN 28100

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** SPAIN

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK CANADA is under common control with the firm.

**Business Address:** 251 FRONT STREET WEST  
TORONTO, ONTARIO, CANADA M5J 2M3

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** CANADA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

# Firm Operations



## Organization Affiliates (continued)

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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### CITIBANK BERHARD is under common control with the firm.

**Business Address:** 28 MEDAN PASAR  
KUALA LAMPUR, MALAYSIA 50050

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** MALAYSIA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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### CITIBANK AKTIENGESELLSCHAFT is under common control with the firm.

**Business Address:** NEUE MEINZER STRASSE 7  
FRANKFURT, GERMANY 60038

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** GERMANY

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT

## Firm Operations



### Organization Affiliates (continued)

SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK(SWITZERLAND) is under common control with the firm.

**Business Address:** BAHNHOFSTRASSE 63  
ZURICH, SWITZERLAND CH-8022

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** SWITZERLAND

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK (POLAND) S.A. is under common control with the firm.

**Business Address:** SENATORSKA 16  
WARSAW, POLAND 00-923

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** POLAND

**Securities Activities:** No

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY

## Firm Operations



### Organization Affiliates (continued)

HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK BELGIUM S.A./N.V. is under common control with the firm.

**Business Address:** BOULEVARD GENERAL JACQUES 2  
BRUSSELS, BELGIUM 1150

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** BELGIUM

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### BANCO CITIBANK S.A. is under common control with the firm.

**Business Address:** AVENIDA PAULISTA, 1111  
SAO PAULO  
SAN PAULO, BRAZIL 013111

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** BRAZIL

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT

## Firm Operations



### Organization Affiliates (continued)

SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITICORP ADMINISTRADORA DE INVERSIONES S.A. is under common control with the firm.**

**Business Address:** MISIONES 1374  
MONTEVIDEO, URUGUAY N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** URUGUAY

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**SALOMON SMITH BARNEY CANADA INC. is under common control with the firm.**

**Business Address:** 181 BAY STREET  
BCE PLACE  
TORONTO, CANADA M5J 2T3

**Effective Date:** 09/01/1998

**Foreign Entity:** Yes

**Country:** CANADA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER



## Firm Operations



### Organization Affiliates (continued)

COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

#### NIKKO SALOMON SMITH BARNEY LIMITED is under common control with the firm.

**Business Address:** ARKANSAS PARK BUILDING  
2-20 ARKANSAS 5-CHOME  
MINATO-KU, TOKYO, JAPAN 107-6122

**Effective Date:** 03/01/1999

**Foreign Entity:** Yes

**Country:** JAPAN

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

#### SALOMON SMITH BARNEY CITI FUND MANAGEMENT LLC is under common control with the firm.

**Business Address:** 388 GREENWICH STREET  
NEW YORK, NY 10013

**Effective Date:** 09/21/1999

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

## Firm Operations



### Organization Affiliates (continued)

**SALOMON SMITH BARNEY CHINA LIMITED is under common control with the firm.**

<b>Business Address:</b>	8 CONNAUGHT PLACE 20TH FLOOR VICTORIA, HONG KONG N/A
<b>Effective Date:</b>	09/01/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	HONG KONG
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

**CITICORP MERCHANT BANK LIMITED is under common control with the firm.**

<b>Business Address:</b>	74 INDEPENDENCE SQUARE PORT OF SPAIN, TRINADAD N/A
<b>Effective Date:</b>	10/08/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	TRINADAD
<b>Securities Activities:</b>	No
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

**INARCO INTERNATIONAL BANK NV is under common control with the firm.**

## Firm Operations



### Organization Affiliates (continued)

<b>Business Address:</b>	ARULEX CENTER PUNTA BRABO ORANJESTAD, ARUBA N/A
<b>Effective Date:</b>	10/08/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	ARUBA
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITICORP INVESTMENT BANK (THE NETHERLANDS) NV is under common control with the firm.

<b>Business Address:</b>	EUROPLAZE HOOGOORDDREEF 54B 1101 BE AMSTERDAM, THE NETHERLANDS 20
<b>Effective Date:</b>	10/08/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	THE NETHERLANDS
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITICORP CAPITAL MARKETS AUSTRALIA LIMITED is under common control with the firm.

## Firm Operations



### Organization Affiliates (continued)

<b>Business Address:</b>	1 MARGARET STREET SYDNEY NSW, AUSTRALIA N/A
<b>Effective Date:</b>	10/08/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	AUSTRALIA
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK PRIVATKUNDEN AG is under common control with the firm.

<b>Business Address:</b>	KASERNENSTRASSE 10 DUSSELDORF, GERMANY N/A
<b>Effective Date:</b>	10/08/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	GERMANY
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK MEXICO, S.A. is under common control with the firm.

<b>Business Address:</b>	GRUPO FINANCIERO CITIBANK PASEO DE LA REFORMA 390
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## Firm Operations



### Organization Affiliates (continued)

	DISTRITO FEDERAL, MEXICO 06695
<b>Effective Date:</b>	10/08/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	MEXICO
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK MALAYSIA (L) LIMITED is under common control with the firm.

<b>Business Address:</b>	LEVEL 11 (F) MAIN OFFICE FINANCIAL PARK LABUAN JALAN LABUAN F.T., MALAYSIA 87000
<b>Effective Date:</b>	10/08/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	MALAYSIA
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK LIMITED is under common control with the firm.

<b>Business Address:</b>	1 MARGARET STREET SYDNEY NSW, AUSTRALIA N/A
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## Firm Operations



### Organization Affiliates (continued)

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** AUSTRALIA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK INTERNATIONAL PLC is under common control with the firm.

**Business Address:** 336 STRAND  
LONDON, ENGLAND WC2R 1HB

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK INTERNATIONAL is under common control with the firm.

**Business Address:** 201 S. BISCAYNE BOULEVARD  
SUITE 3300  
MIAMI, FL 33131-4325

**Effective Date:** 10/08/1998

## Firm Operations



### Organization Affiliates (continued)

<b>Foreign Entity:</b>	No
<b>Country:</b>	
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK ESPANA S.A. is under common control with the firm.

<b>Business Address:</b>	AVENIDA DE EUROPA 19 ALCOBENDAS, MADRID, SPAIN 28100
<b>Effective Date:</b>	10/08/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	SPAIN
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK CANADA is under common control with the firm.

<b>Business Address:</b>	251 FRONT STREET WEST TORONTO, ONTARIO, CANADA M5J 2M3
<b>Effective Date:</b>	10/08/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	CANADA

## Firm Operations



### Organization Affiliates (continued)

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITIBANK BERHAD is under common control with the firm.**

**Business Address:** 28 MEDAN PASAR  
KUALA LAMPUR, MALAYSIA 50050

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** MALAYSIA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITIBANK AKTIENGESELLSCHAFT is under common control with the firm.**

**Business Address:** NEUE MEINZER STRASSE 7  
FRANKFURT, GERMANY 60038

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** GERMANY

**Securities Activities:** Yes



## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITIBANK(SWITZERLAND) is under common control with the firm.**

**Business Address:** BAHNHOFSTRASSE 63  
ZURICH, SWITZERLAND CH-8022

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** SWITZERLAND

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITIBANK BELGIUM S.A./N.V. is under common control with the firm.**

**Business Address:** BOULEVARD GENERAL JACQUES 2  
BRUSSELS, BELGIUM 1150

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** BELGIUM

**Securities Activities:** Yes

**Investment Advisory Activities:** No

## Firm Operations



### Organization Affiliates (continued)

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### BANCO CITIBANK S.A. is under common control with the firm.

**Business Address:** AVENIDA PAULISTA, 1111  
SAO PAULO  
SAN PAULO, BRAZIL 013111

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** BRAZIL

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITICORP ADMINISTRADORA DE INVERSIONES S.A.(URUGUAY) is under common control with the firm.

**Business Address:** MISIONES 1374  
MONTEVIDEO, URUGUAY N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** URUGUAY

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF

## Firm Operations



### Organization Affiliates (continued)

SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### **SALOMON SMITH BARNEY CANADA INC. is under common control with the firm.**

**Business Address:** 181 BAY STREET  
BCE PLACE  
TORONTO, CANADA M5J 2T3

**Effective Date:** 09/01/1998

**Foreign Entity:** Yes

**Country:** CANADA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### **PFSL INVESTMENTS CANADA LTD. is under common control with the firm.**

**Business Address:** 350 BURNHAMTHORPE ROAD WEST  
SUITE 300  
MISSISSAUGA, ONTARIO, CANADA L5N 2R7

**Effective Date:** 08/22/1991

**Foreign Entity:** Yes

**Country:** CANADA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF

## Firm Operations



### Organization Affiliates (continued)

SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### **SALOMON SWAPCO INC. is under common control with the firm.**

**Business Address:** 388 GREENWICH STREET  
NEW YORK, NY 10013

**Effective Date:** 09/01/1998

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### **SALOMON SMITH BARNEY SINGAPORE PTE. LIMITED is under common control with the firm.**

**Business Address:** 1 TEMESEK AVENUE  
SINGAPORE, SINGAPORE 13192

**Effective Date:** 09/01/1998

**Foreign Entity:** Yes

**Country:** SINGAPORE

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A

## Firm Operations



### Organization Affiliates (continued)

WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**SALOMON BROTHERS TAIWAN LIMITED is under common control with the firm.**

**Business Address:** 9TH FLOOR, WAISIN FINANCIAL BLDG. NO. 117  
MING SHENG EAST RD, SECTION 3  
TAIPEI, TAIWAN 90646

**Effective Date:** 09/01/1998

**Foreign Entity:** Yes

**Country:** TAIWAN

**Securities Activities:** No

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITICORP ADMINISTRADORA DE INVERSIONES S.A. (ARGENTINA) is under common control with the firm.**

**Business Address:** CERRITO 740  
SAN MARTIN 140  
BUENOS AIRES, ARGENTINA N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** ARGENTINA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A

## Firm Operations



### Organization Affiliates (continued)

WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITICORP BROKERAGE (INDIA) LIMITED is under common control with the firm.

**Business Address:** C-61 BANDRA KURLA COMPLEX  
MUMBAI, INDIA 400-051

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** INDIA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITICORP INTERNATIONAL SECURITIES LTD. is under common control with the firm.

**Business Address:** HAY'S LANE  
LONDON, ENGLAND N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT

## Firm Operations



### Organization Affiliates (continued)

SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### **SALOMON SMITH BARNEY SECURITIES (TAIWAN) LIMITED is under common control with the firm.**

**Business Address:** 1F NO. 54-3 MING SHENG EAST  
TAIPEI, TAIWAN N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** TAIWAN

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### **CITICORP SECURITIES INTERNATIONAL (RP) INC. is under common control with the firm.**

**Business Address:** AYALA AVENUE  
MAKATI, PHILLIPPINES N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** PHILLIPPINES

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

## Firm Operations



### Organization Affiliates (continued)

**CITIBANK GLOBAL ASSET MANAGEMENT (ASIA) LIMITED is under common control with the firm.**

<b>Business Address:</b>	40TH FLOOR, CITIBANK PLAZA 3 GARDEN ROAD VICTORIA, HONG KONG N/A
<b>Effective Date:</b>	10/08/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	HONG KONG
<b>Securities Activities:</b>	No
<b>Investment Advisory Activities:</b>	Yes
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

**SALOMON SMITH BARNEY (CHILE) S.A. CORREDORES DE BOLSA is under common control with the firm.**

<b>Business Address:</b>	AVENIDA ANDRES BELLO 2687 SANTIAGO, CHILE N/A
<b>Effective Date:</b>	10/08/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	CHILE
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

**CITIBROKERAGE S.A. is under common control with the firm.**



## Firm Operations



### Organization Affiliates (continued)

**Business Address:** U.I. SENATORSKA 12  
WARSAW, POLAND 00 923

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** POLAND

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITISECURITIES LIMITED is under common control with the firm.

**Business Address:** 1 MARGARET STREET  
SYDNEY, NSW, AUSTRALIA N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** AUSTRALIA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### SALOMON SMITH BARNEY AUSTRALIA PTY LIMITED is under common control with the firm.

**Business Address:** LEVEL 16, GROSVENOR PLACE  
225 GEORGE STREET

## Firm Operations



### Organization Affiliates (continued)

	SYDNEY NSW, AUSTRALIA 2000
<b>Effective Date:</b>	09/01/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	AUSTRALIA
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

#### PT SALOMON BROTHERS NUSA SECURITIES is under common control with the firm.

<b>Business Address:</b>	GEDUNG GRBI #25-02 JT JEND. SUDIRMAN NO. 28 JAKARTA, INDONESIA 10210
<b>Effective Date:</b>	09/01/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	INDONESIA
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

#### LATIN AMERICAN INVESTMENT BANK BAHAMAS LIMITED is under common control with the firm.

<b>Business Address:</b>	CITIBANK BUILDING THOMPSON BOULEVARD & OAKES
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## Firm Operations



### Organization Affiliates (continued)

	NASSAU, BAHAMAS N/A
<b>Effective Date:</b>	10/08/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	BAHAMAS
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

#### TRIBECA MANAGEMENT, L.L.C is under common control with the firm.

<b>Business Address:</b>	388 GREENWICH STREET NEW YORK, NY 10013
<b>Effective Date:</b>	12/31/1993
<b>Foreign Entity:</b>	No
<b>Country:</b>	
<b>Securities Activities:</b>	No
<b>Investment Advisory Activities:</b>	Yes
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

#### TRAVELERS INVESTMENT ADVISERS, INC. is under common control with the firm.

<b>Business Address:</b>	388 GREENWICH STREET NEW YORK, NY 10013
<b>Effective Date:</b>	06/24/1996

## Firm Operations



### Organization Affiliates (continued)

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### TRAVELERS BANK & TRUST, FSB (TRUST DEPARTMENT is under common control with the firm.)

**Business Address:** 388 GREENWICH STREET  
NEW YORK, NY 10013

**Effective Date:** 12/31/1993

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### TRAVELERS ASSET MANAGEMENT INTERNATIONAL CORPORATION is under common control with the firm.

**Business Address:** ONE TOWER SQUARE  
HARTFORD, CT 06183-2030

**Effective Date:** 12/31/1993

**Foreign Entity:** No

**Country:**

## Firm Operations



### Organization Affiliates (continued)

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**SMITH BARNEY STRATEGY ADVISERS INC. is under common control with the firm.**

**Business Address:** 388 GREENWICH STREET, 22ND FLOOR  
NEW YORK, NY 10013

**Effective Date:** 10/22/1986

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITISTREET FUNDS MANAGEMENT LLC is under common control with the firm.**

**Business Address:** TWO TOWER SQUARE  
EAST BRUNSWICK, NJ 08816

**Effective Date:** 12/31/1993

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITICORP SECURITIES SERVICES, INC. is under common control with the firm.

**CRD #:** 15387

**Business Address:** 111 WALL STREET, 11TH FLOOR  
NEW YORK, NY 10005

**Effective Date:** 10/08/1998

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITICORP PERU S.A. SOCIEDAD AGENTE DE BOLSA is under common control with the firm.

**Business Address:** AVENIDA CAMINO REAL 456  
TORRE REAL, PISO 5 OF 503  
SAN ISIDRO, LIMA, PERU N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** PERU

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITINVERSIONES DE TITULOS Y VALORES (PUESTO DE BOLSA) S.A. is under common control with the firm.

**Business Address:** JOHN F. KENNEDY BOULEVARD N  
SANTO DOMINGO, DOMINICAN REPUBLIC N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** DOMINICAN REPUBLIC

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITICORP CAPITAL PHILLIPPINES, INC. is under common control with the firm.

**Business Address:** CITIBANK TOWER  
8741 PASEO DE ROXAS  
MAKATI, PHILLIPPINES N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** PHILLIPPINES

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITICORP SECURITIES WEST AFRICA is under common control with the firm.

**Business Address:** 2B AVENUE DALA FOSSE  
ABIDJAN, IVORY COAST 01

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** IVORY COAST

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITITRADING S.A. CASA DE VALORES is under common control with the firm.

**Business Address:** AVENIDA JUAN LEON MERA 130  
Y AVENIDA PATRIA  
QUITO, EQUADOR 1393

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** EQUADOR

**Securities Activities:** Yes



## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITIBANK-CORRETORA DE CAMBIO is under common control with the firm.**

**Business Address:** TITULOS E VALORES MOBILARI  
AVENIDA PAULISTA  
SAO PAULO, BRAZIL 1111

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** BRAZIL

**Securities Activities:** Yes

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITIBANK DISTRIBUIDORA DE TITULOS E VALORES MOBILIARIOS S.A. is under common control with the firm.**

**Business Address:** AVENIDA PAULISTA  
2ND FLOOR  
SAO PAULO, SP BRAZIL 1111

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** BRAZIL

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

**CITIVALORES DE EL SALVADOR S.A. DE C.V. is under common control with the firm.**

**Business Address:** AL MEDA DR. MANUEL ENRIQUE  
3RD FLOOR, EDIFICIO "B" COMPLEX  
SAN SALVADOR, EL SALVADOR N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** EL SALVADOR

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

**CITICORP INTERNATIONAL LIMITED is under common control with the firm.**

**Business Address:** CITIBANK PLAZA  
3 GARDEN ROAD, 48TH FLOOR  
CENTRAL, HONG KONG N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** HONG KONG

**Securities Activities:** No

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**P.T. CITICORP SECURITIES INDONESIA is under common control with the firm.**

**Business Address:** LANDMARK CENTRE, TOWER A  
6TH FLOOR  
J1 JENDRAL SUDIRMAN NO., JAKARTA 12910

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** INDONESIA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITIVALORES S.A. COMISIONISTA DE BOLSA is under common control with the firm.**

**Business Address:** CARRERA 9 A NO. 99-02  
PISO 2  
BOGOTA, COLUMBIA N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** COLUMBIA

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIVALORES PUESTO DE BOLSA S.A. is under common control with the firm.

**Business Address:** OFICENTRO EJECUTIVO LA SABA  
PRIMER PISO DETRAS DE LA CO  
SABANA SUR, SAN JOSE, COSTA RICA N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** COSTA RICA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIVALORES S.A. is under common control with the firm.

**Business Address:** VIA ESPANA 124  
PANAMA CITY, PANAMA N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** PANAMA

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITICORP VALORES S.A. SOCIEDAD DE BOLSA is under common control with the firm.

**Business Address:** BARTOLOME MITRE 530  
5TH FLOOR  
BUENOS AIRES, ARGENTINA N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** ARGENTINA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITICORP SECURITIES (CR) S.R.O. is under common control with the firm.

**Business Address:** N/A  
EUROPSKA 178, 166 PRAGUE 6 N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** CZECH REPUBLIC

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIVALORES DE HONDURA S S.A. is under common control with the firm.

**Business Address:** BULEVAR SUYAPA  
INTERSECCION LOMA LINDA  
TEQUCIGALPA, HONDURAS N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** HONDURAS

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITIBANK INVESTMENT AND SECURITIES RT. is under common control with the firm.

**Business Address:** 1051 BUDAPEST  
SZABADSAG TEV 7, HUNGARY N/A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** HUNGARY

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITICORP INVERSORA S.A. GERENTE DE FONDOS is under common control with the firm.**

**Business Address:** COMUNES DE INVERSION  
SAN MARTIN 140, 12TH FLOOR  
BUENOS AIRES, ARGENTINA 1309

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** ARGENTINA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITIVERSIONES, S.A. is under common control with the firm.**

**Business Address:** A.V. REFORMA 15-45  
GUATEMALA CITY, GUATEMALA ZONA 10

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** GUATEMALA

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITIBANK MERCARDO DE CAPITALES, CITIMERCA C.A. is under common control with the firm.**

**Business Address:** EDIFICIO CITIBANK  
CARMELITAS  
ALTAGRACIA, CARACAS, VENEZUELA 1010A

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** VENEZUELA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITICORP INVESTMENTS LIMITED is under common control with the firm.**

**Business Address:** 1 MARGARET STREET  
SYDNEY NSW, AUSTRALIA 2000

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** AUSTRALIA

**Securities Activities:** No



## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITICORP VENTURE CAPITAL BERATUNGS GESELLSCHAFT is under common control with the firm.

**Business Address:** NEUE MAINZER STRASSE 75  
FRANKFURT, GERMANY 60311

**Effective Date:** 10/08/1998

**Foreign Entity:** Yes

**Country:** GERMANY

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### KEB SALOMON SMITH BARNEY SECURITIES CO., LTD is under common control with the firm.

**Business Address:** DONG-AH LIFE INSURANCE BUILDING  
33, DA-DONG, CHUNG-KU  
SEOUL, KOREA 100-180

**Effective Date:** 09/01/1998

**Foreign Entity:** Yes

**Country:** SOUTH KOREA

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### **SALOMON BROTHERS INTERNATIONAL LIMITED is under common control with the firm.**

**Business Address:** VICTORIA PLAZA  
111 BUCKINGHAM PALACE ROAD  
LONDON, ENGLAND SW1W OSB

**Effective Date:** 08/01/1998

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### **SALOMON SMITH BARNEY SA is under common control with the firm.**

**Business Address:** 7, RUE DE TILSITT  
PARIS, FRANCE 75017

**Effective Date:** 09/01/1998

**Foreign Entity:** Yes

**Country:** FRANCE

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### **SALOMON BROTHERS UK LIMITED is under common control with the firm.**

**Business Address:** VICTORIA PLAZA  
111 BUCKINGHAM PALACE ROAD  
LONDON, ENGLAND SW1W 0SB

**Effective Date:** 09/01/1998

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### **SALOMON SMITH BARNEY HONG KONG LIMITED is under common control with the firm.**

**Business Address:** THREE EXCHANGE SQUARE  
8 CONNAUGHT PLACE, 20TH FLOOR  
HONG KONG, HONG KONG N/A

**Effective Date:** 09/01/1998

**Foreign Entity:** Yes

**Country:** HONG KONG

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

**SALOMON SMITH BARNEY AUSTRALIA CAPITAL MARKETS PTY LIMITED is under common control with the firm.**

**Business Address:** LEVEL 16, GROSVENOR PLACE  
225 GEORGE STREET  
SYDNEY NSW, AUSTRALIA 2000

**Effective Date:** 09/01/1998

**Foreign Entity:** Yes

**Country:** AUSTRALIA

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

**SALOMON SMITH BARNEY AUSTRALIA CORPORATE FINANCE PTY LIMITED is under common control with the firm.**

**Business Address:** LEVEL 16, GROSVENOR PLACE  
225 GEORGE STREET  
SYDNEY NSW, AUSTRALIA 2000

**Effective Date:** 09/01/1998

**Foreign Entity:** Yes

**Country:** AUSTRALIA

## Firm Operations



### Organization Affiliates (continued)

<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### **SALOMON SMITH BARNEY NEW ZEALAND LIMITED is under common control with the firm.**

<b>Business Address:</b>	LEVEL 3 89 THE TERRACE WELLINGTON WELLINGTON, NEW ZEALAND N/A
<b>Effective Date:</b>	09/01/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	NEW ZEALAND
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### **CITICORP INVESTMENT BANK (SINGAPORE) LIMITED is under common control with the firm.**

<b>Business Address:</b>	5 SHERITON WAY UIC BUILDING SINGAPORE, SINGAPORE 06881
<b>Effective Date:</b>	10/08/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	SINGAPORE

## Firm Operations



### Organization Affiliates (continued)

<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITICORP CAPITAL MARKETS SOCIEDAD ANCNIMA is under common control with the firm.

<b>Business Address:</b>	SAN MARTIN 140 PISO 9 BUENOS AIES, ARGENTINA N/A
<b>Effective Date:</b>	10/08/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	ARGENTINA
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### ZAO SALOMON BROTHERS is under common control with the firm.

<b>Business Address:</b>	8-10 GASHEKA STREET MOSCOW, RUSSIA N/A
<b>Effective Date:</b>	09/01/1998
<b>Foreign Entity:</b>	Yes
<b>Country:</b>	RUSSIA
<b>Securities Activities:</b>	Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**TRIBECA INVESTMENTS, L.L.C. is under common control with the firm.**

**CRD #:** 40631

**Business Address:** 388 GREENWICH STREET  
NEW YORK, NY 10013

**Effective Date:** 02/05/1996

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**TRAVELERS DISTRIBUTION, LLC is under common control with the firm.**

**CRD #:** 43373

**Business Address:** ONE TOWER SQUARE, 2MS  
HARTFORD, CT 06183

**Effective Date:** 11/15/1996

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**TOWER SQUARE SECURITIES, INC. is under common control with the firm.**

**CRD #:** 833

**Business Address:** ONE TOWER SQUARE, 2MS  
HARTFORD, GA 06183-2030

**Effective Date:** 12/31/1993

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**THE TRAVELERS INVESTMENT MANAGEMENT COMPANY is under common control with the firm.**

**Business Address:** ONE TOWER SQUARE, 0PB  
HARTFORD, CT 06183-2030

**Effective Date:** 12/30/1994

**Foreign Entity:** No

**Country:**

**Securities Activities:** No



## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**SALOMON SMITH BARNEY INC. is under common control with the firm.**

**CRD #:** 7059

**Business Address:** 388 GREENWICH  
NEW YORK, NY 10013

**Effective Date:** 07/31/1993

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**SALOMON SMITH BARNEY PUERTO RICO INC. is under common control with the firm.**

**CRD #:** 40586

**Business Address:** 270 MUNOZ RIVERA AVENUE  
SAN JUAN, PR 00918

**Effective Date:** 08/04/1994

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

# Firm Operations



## Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**SMITH BARNEY GLOBAL CAPITAL MANAGEMENT, INC. is under common control with the firm.**

**Business Address:** 10 PICADILLY  
LONDON, ENGLAND N/A

**Effective Date:** 01/22/1988

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITISTREET ADVISORS LLC is under common control with the firm.**

**CRD #:** 3989

**Business Address:** TWO TOWER CENTER  
EAST BRUNSWICK, NM 08816

**Effective Date:** 11/28/1997

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**SALOMON REINVESTMENT COMPANY INC is under common control with the firm.**

**CRD #:** 39213

**Business Address:** 390 GREENWICH STREET  
NEW YORK, NY 10013

**Effective Date:** 10/08/1998

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**SALOMON BROTHERS UK EQUITY LIMITED is under common control with the firm.**

**Business Address:** VICTORIA PLAZA  
111 BUCKINGHAM PALACE ROAD  
LONDON, ENGLAND SW 1W OSB

**Effective Date:** 11/28/1997

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### **SALOMON BROTHERS INTERNATIONAL LIMITED is under common control with the firm.**

**Business Address:** VICTORIA PLAZA  
111 BUCKINGHAM PALACE ROAD  
LONDON, ENGLAND N/A

**Effective Date:** 09/01/1998

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### **SALOMON BROTHERS ASSET MANAGEMENT LIMITED is under common control with the firm.**

**Business Address:** VICTORIA PLAZA  
111 BUCKINGHAM PALACE ROAD  
LONDON, ENGLAND SW 1W OSB

**Effective Date:** 11/28/1997

**Foreign Entity:** Yes

**Country:** ENGLAND

**Securities Activities:** No

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### **SALOMON BROTHERS ASSET MANAGEMENT INC. is under common control with the firm.**

**Business Address:** SEVEN WORLD TRADE CENTER  
NEW YORK, NY 10048

**Effective Date:** 11/28/1997

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### **SALOMON BROTHERS ASSET MANAGEMENT ASIA PACIFIC is under common control with the firm.**

**Business Address:** 15F, THREE EXCHANGE CENTER  
HONG KONG, HONG KONG N/A

**Effective Date:** 11/28/1997

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### SALOMON BROTHERS AG is under common control with the firm.

**Business Address:** P.O. BOX 160654  
WIESENHUETTENSTRASSE 10  
60329 FRANKFURT AM MAIN, GERMANY N/A

**Effective Date:** 11/28/1997

**Foreign Entity:** Yes

**Country:** GERMANY

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### PFS INVESTMENTS INC. is under common control with the firm.

**CRD #:** 10111

**Business Address:** 3120 BRECKINRIDGE BLVD.  
DULUTH, GA 30199

**Effective Date:** 12/01/1988

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** No

## Firm Operations



### Organization Affiliates (continued)

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### PFS DISTRIBUTORS, INC. is under common control with the firm.

**CRD #:** 19253

**Business Address:** 3100 BRECKINRIDGE BLVD.  
DULUTH, GA 30199

**Effective Date:** 12/01/1988

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITISTREET FINANCIAL SERVICES L.L.C. is under common control with the firm.

**Business Address:** TWO TOWER SQUARE  
EAST BRUNSWICK, NJ 08816

**Effective Date:** 11/28/1997

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF

## Firm Operations



### Organization Affiliates (continued)

SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITISTREET EQUITIES LLC is under common control with the firm.

<b>CRD #:</b>	7447
<b>Business Address:</b>	TWO TOWER CENTER NEW BRUNSWICK, NJ 08816
<b>Effective Date:</b>	11/28/1997
<b>Foreign Entity:</b>	No
<b>Country:</b>	
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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#### CITICORP SECURITIES, INC. is under common control with the firm.

<b>CRD #:</b>	7474
<b>Business Address:</b>	55 WATER STREET NEW YORK, NY 10043
<b>Effective Date:</b>	10/08/1998
<b>Foreign Entity:</b>	No
<b>Country:</b>	
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No



## Firm Operations



### Organization Affiliates (continued)

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITICORP INVESTMENT SERVICES is under common control with the firm.**

**CRD #:** 23988

**Business Address:** ONE COURT SQUARE  
LONG ISLAND CITY, NY 11120

**Effective Date:** 10/08/1998

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** Yes

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILIATED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**CITICORP FINANCIAL SERVICES CORPORATION is under common control with the firm.**

**CRD #:** 17053

**Business Address:** 1 CITYBANK DRIVE  
CITIBANK BUILDING - 3RD FLOOR  
SAN JUAN, PR 00926

**Effective Date:** 10/08/1998

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory** No

## Firm Operations



### Organization Affiliates (continued)

#### Activities:

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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**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
- or foreign bank

**CITIGROUP INC. is a Bank Holding Company and controls the firm.**

**Business Address:** 153 EAST 53RD STREET  
NEW YORK, NY 10043

**Effective Date:** 10/08/1998

**Description:** ROBINSON-HUMPHREY IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY INC., WHICH IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON BROTHERS HOLDING COMPANY INC. ("SBHC"), A WHOLLY-OWNED DIRECT SUBSIDIARY OF SALOMON SMITH BARNEY HOLDINGS INC. ("SSBHI"). SSBHI IS A WHOLLY-OWNED DIRECT SUBSIDIARY OF CITIGROUP INC. THE AFFILITED ENTITY IS UNDER COMMON CONTROL OF SBHC, SSBHI OR CITIGROUP INC.

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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	14	0
Arbitration	N/A	11	N/A

## Disclosure Event Details

### What you should know about reported disclosure events:

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

### 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 14

**Reporting Source:** Regulator

**Current Status:** Final



<b>Allegations:</b>	NASD CONDUCT RULE 3220 AND 3320, NASD MARKETPLACE RULES 4613(B) AND 6440(F), AND SEC RULE 11AC1-1 - RESPONDENT MEMBER ("FIRM") WAS A MARKET MAKER IN SECURITIES, AND AN ORDER WAS PRESENTED TO THE FIRM AT THE FIRM'S PUBLISHED BID OR PUBLISHED OFFER IN AN AMOUNT UP TO ITS PUBLISHED QUOTATION SIZE. THE FIRM FAILED TO EXECUTE THE ORDERS UPON PRESENTMENT AND THEREBY FAILED TO HONOR ITS PUBLISHED QUOTATION. IN ADDITION, THE FIRM FAILED TO ADJUST THE PRICE OF AN OPEN ORDER TO REFLECT THE VALUE OF DIVIDENDS. FURTHERMORE, THE FIRM PURCHASED (SOLD) AN ELIGIBLE SECURITY AT BELOW (ABOVE) THE PRICE AT WHICH IT HELD AN UNEXECUTED LIMITED PRICE ORDER TO PURCHASE (SELL) SUCH SECURITY FOR A CUSTOMER.
<b>Initiated By:</b>	NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
<b>Date Initiated:</b>	06/20/2003
<b>Docket/Case Number:</b>	CMS030138
<b>Principal Product Type:</b>	Other
<b>Other Product Type(s):</b>	UNKNOWN TYPE OF SECURITIES
<b>Principal Sanction(s)/Relief Sought:</b>	
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Resolution Date:</b>	06/20/2003
<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$8,000.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RESPONDENT MEMBER CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED AND FINED \$8,000.

#### Disclosure 2 of 14

<b>Reporting Source:</b>	Regulator
<b>Current Status:</b>	Final
<b>Allegations:</b>	SEC RULE 11AC1-4 - RESPONDENT MEMBER ("FIRM") FAILED TO DISPLAY IMMEDIATELY THE CUSTOMER LIMIT ORDERS IN NASDAQ SECURITIES IN



ITS PUBLIC QUOTATION, WHEN EACH SUCH ORDER WAS AT A PRICE THAT WOULD HAVE IMPROVED THE FIRM'S BID OR OFFER IN EACH SUCH SECURITY; OR WHEN THE ORDER WAS PRICED EQUAL TO THE FIRM'S BID OR OFFER AND THE NATIONAL BEST BID OR OFFER IN SUCH SECURITY, AND THE SIZE OF THE ORDER REPRESENTED MORE THAN A DE MINIMIS CHANGE IN RELATION TO THE SIZE ASSOCIATED WITH ITS BID OR OFFER IN EACH SUCH SECURITY.

**Initiated By:** NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

**Date Initiated:** 06/13/2003

**Docket/Case Number:** CMS030129

**Principal Product Type:** Other

**Other Product Type(s):** UNKNOWN TYPE OF SECURITIES

**Principal Sanction(s)/Relief Sought:**

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

**Resolution:** Acceptance, Waiver & Consent(AWC)

**Resolution Date:** 06/13/2003

**Sanctions Ordered:** Monetary/Fine \$5,000.00

**Other Sanctions Ordered:**

**Sanction Details:** WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RESPONDENT MEMBER CONSENTED TO THE DESCRIBED SANCTION AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS FINED \$5,000.

#### Disclosure 3 of 14

**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** NASDR ALLEGED THAT TRANSACTIONS REPORTED BY ROBINSON-HUMPHREY TO ACT VIOLATED CERTAIN OF THE CONDUCT RULES INCLUDING RULE 4632(A), 4632(1)(2), 4632(F), 6130(D)(7) AND 6130(D)(10).

**Initiated By:** NASDR

**Date Initiated:** 12/05/1997

**Docket/Case Number:** AWC ETR: 10960044



<b>Principal Product Type:</b>	Equity - OTC
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Censure
<b>Other Sanction(s)/Relief Sought:</b>	\$5,000.00 FINE
<b>Resolution:</b>	Settled
<b>Resolution Date:</b>	12/15/1998
<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$5,000.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	A CENSURE AND A FINE OF \$5,000.00.
<b>Firm Statement</b>	THIS MATTER WAS SETTLED ON 12/15/1998. ROBINSON-HUMPHREY CONSENTED TO A CENSURE AND A FINE OF \$5,000. CHARGES STEM FROM THE 1996 TRADING AND MARKET MAKING SURVEILLANCE AUDIT BY THE NASDR'S MARKET REGULATION DEPARTMENT STAFF (THE "STAFF") WHICH REVIEWED 250 TRANSACTIONS WHICH ROBINSON-HUMPHREY REPORTED TO THE AUTOMATED CONFIRMATION TRANSACTION SERVICE ("ACT") ON TRADE DATE APRIL 3, 1996.

#### Disclosure 4 of 14

<b>Reporting Source:</b>	Firm
<b>Current Status:</b>	Final
<b>Allegations:</b>	IN AN ACTION BROUGHT AGAINST ALMOST ALL MAJOR NASDAQ MARKET MAKERS, THE SEC FOUND THAT IN 1994 MARKET MAKERS, INCLUDING ROBINSON-HUMPHREY, VIOLATED PROVISIONS OF THE FEDERAL SECURITIES LAWS IN CONNECTION WITH THEIR MARKET MAKING ACTIVITIES IN NASDAQ SECURITIES.
<b>Initiated By:</b>	SECURITIES AND EXCHANGE COMMISSION
<b>Date Initiated:</b>	01/01/1999
<b>Docket/Case Number:</b>	RELEASE NO.34-40923
<b>Principal Product Type:</b>	Equity - OTC
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Cease and Desist


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

**Resolution Date:** 01/11/1999

**Sanctions Ordered:** Monetary/Fine \$150,000.00  
Disgorgement/Restitution  
Cease and Desist/Injunction

**Other Sanctions Ordered:** SUBMIT SECTIONS OF POLICIES TO AN INDEPENDENT CONSULTANT.

**Sanction Details:** THIS ACTION WAS INITIATED AND SETTLED JANUARY 11, 1999 AGAINST ALMOST ALL MAJOR NASDAQ MARKET MAKERS. WITHOUT ADMITTING OR DENYING LIABILITY AND WITHOUT A HEARING, ROBINSON-HUMPHREY AGREED TO PAY A FINE OF \$150,000 AND TO PAY DISGORGEMENT OF \$1,786. IT ALSO AGREED TO A CEASE AND DESIST ORDER AND TO SUBMIT CERTAIN SECTIONS OF ITS POLICY TO AN INDEPENDENT CONSULTANT.

**Firm Statement** WITHOUT ADMITTING OR DENYING LIABILITY AND WITHOUT A HEARING ROBINSON-HUMPHREY AGREED TO PAY A FINE OF \$150,000.00 AND AGREED TO PAY DISGORGEMENT OF \$1,786. ROBINSON-HUMPHREY ALSO AGREED TO A CEASE AND DESIST ORDER AND TO SUBMIT CERTAIN SECTIONS OF THE POLICIES TO AN INDEPENDENT CONSULTANT.

**Disclosure 5 of 14**
**Reporting Source:** Regulator

**Current Status:** Final

**Allegations:** 11/29/99GS: ON NOVEMBER 10, 1999 DISTRICT NO. 7 NOTIFIED RESPONDENT MEMBER THAT THE LETTER OF ACCEPTANCE, WAIVER, AND CONSENT WAS ACCEPTED - (NASD RULES 2110 AND IM-2110-1 - IN CONNECTION WITH NEW STOCK ISSUES, RESPONDENT MEMBER FAILED TO OBTAIN IN WRITING REQUIRED INFORMATION CONCERNING THE BENEFICIAL OWNERS OF INVESTMENT PARTNERSHIP ACCOUNTS, CORPORATE ACCOUNTS OR MONEY MANAGER ACCOUNTS).

**Initiated By:** THE NATIONAL ASSOCIATION OF SECURITIES DEALERS

**Date Initiated:** 11/10/1999

**Docket/Case Number:** C07990073

**Principal Product Type:** Other

**Other Product Type(s):**





**Principal Sanction(s)/Relief Sought:**

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

**Resolution:** Acceptance, Waiver & Consent(AWC)

**Resolution Date:** 11/10/1999

**Sanctions Ordered:** Censure  
Monetary/Fine \$10,000.00

**Other Sanctions Ordered:** 04/11/2000GS: \$10,000 PAID ON 12/13/99 - INVOICE NO. 99-07-947.

**Sanction Details:** SEE ABOVE

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** ROBINSON-HUMPHREY SUBMITTED A LETTER OF ACCEPTANCE, WAIVER AND CONSENT TO ALLEGATIONS IT VIOLATED NASD CONDUCT RULE 2110 AND RULE IM-2110-1 THEREUNDER RELATING TO FREE-RIDING AND WITHHOLDING.

**Initiated By:** NASD REGULATION, INC.

**Date Initiated:** 04/23/1999

**Docket/Case Number:** C07990073

**Principal Product Type:** Equity - OTC

**Other Product Type(s):** HOT ISSUES

**Principal Sanction(s)/Relief Sought:** Censure

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

**Resolution:** Acceptance, Waiver & Consent(AWC)

**Resolution Date:** 11/10/1999

**Sanctions Ordered:** Censure  
Monetary/Fine \$10,000.00

**Other Sanctions Ordered:**

**Sanction Details:** ROBINSON-HUMPHREY CONSENTED TO THE SANCTION OF A CENSURE



AND A \$10,000 FINE WITHOUT ADMITTING OR DENYING THE ALLEGATIONS.

## Firm Statement

ROBINSON-HUMPHREY SUBMITTED A LETTER OF ACCEPTANCE, WAIVER AND CONSENT TO ALLEGATIONS IT VIOLATED NASD CONDUCT RULE 2110 AND RULE IM-2110-1 THEREUNDER (FREE-RIDING AND WITHHOLDING). THE AWC ALLEGES THAT ROBINSON-HUMPHREY SOLD TWO HOT ISSUES IN 1996 AND 1997 TO A TOTAL OF 19 INVESTMENT PARTNERSHIP ACCOUNTS, CORPORATE ACCOUNTS OR MONEY MANAGER ACCOUNTS WITHOUT FIRST OBTAINING PROPER WRITTEN DOCUMENTATION CONCERNING THE BENEFICIAL OWNERS OF THE ACCOUNTS.

## Disclosure 6 of 14

**Reporting Source:** Regulator

**Current Status:** Final

**Allegations:**

**Initiated By:** NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

**Date Initiated:** 01/27/1999

**Docket/Case Number:** CMS980111 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:** 01/27/1999

**Sanctions Ordered:** Censure  
Monetary/Fine \$7,500.00  
Disgorgement/Restitution

**Other Sanctions Ordered:**

**Sanction Details:**

**Regulator Statement** LETTER OF ACCEPTANCE, WAIVER AND CONSENT NO. CMS980111 AWC.

ON JANUARY 27, 1999, THE ROBINSON-HUMPHREY COMPANY, LLC (RHCO) WAS NOTIFIED THAT THE LETTER OF ACCEPTANCE, WAIVER AND CONSENT



(AWC) IT SUBMITTED WAS ACCEPTED BY NASD REGULATION, INC.'S OFFICE OF DISCIPLINARY AFFAIRS AND THE NATIONAL ADJUDICATORY COUNCIL. THE AWC ALLEGES THAT THE FOLLOWING VIOLATIONS OCCURRED:

RHCO FAILED TO USE REASONABLE DILIGENCE TO ASCERTAIN THE BEST INTER-DEALER MARKET FOR FOUR SECURITIES TRANSACTIONS AND FAILED TO BUY OR SELL IN SUCH MARKET SO THAT THE RESULTANT PRICE TO THE CUSTOMER WAS AS FAVORABLE AS POSSIBLE UNDER PREVAILING MARKET CONDITIONS. THE ABOVE CONDUCT CONSTITUTES SEPARATE AND DISTINCT VIOLATIONS OF NASD CONDUCT RULES 2110 AND 2320.

RHCO FAILED TO IDENTIFY THREE AGGREGATED TRANSACTIONS REPORTS IN NASDAQ NATIONAL MARKET SECURITIES IN A MANNER DIRECTED BY THE ASSOCIATION AND IMPROPERLY IDENTIFIED ONE TRANSACTION AS AN AGGREGATED TRADE; FAILED TO REPORT THE CORRECT SYMBOL INDICATING WHETHER ONE TRANSACTION IN A NASDAQ NATIONAL MARKET SECURITY WAS A BUY, SELL, OR CROSS; FAILED TO REPORT TO ACT THE CORRECT TIME OF EXECUTION IN SEVEN TRANSACTIONS IN NASDAQ NATIONAL MARKET SECURITIES; FAILED TO DESIGNATE AS LATE SIX TRANSACTIONS IN NASDAQ NATIONAL MARKET SECURITIES; DOUBLE REPORTED TO ACT ONE TRANSACTION IN A NASDAQ NATIONAL MARKET SECURITY; AND FAILED TO ACCEPT OR DECLINE TWO TRANSACTIONS IN ELIGIBLE SECURITIES WITHIN TWENTY MINUTES AFTER EXECUTION. THIS CONDUCT CONSTITUTES SEPARATE AND DISTINCT VIOLATIONS OF NASD MARKETPLACE RULES 4632(a), 4632(c) 4632(f), AND 6130(b).

RHCO WAS CENSURED AND FINED \$7,500. RHCO ALSO AGREED TO PROVIDE RESTITUTION AND INTEREST IN A MANNER DIRECTED BY THE ASSOCIATION TO EACH CUSTOMER WHOSE ORDERS WERE TREATED IN A MANNER INCONSISTENT WITH THE DUTY OF BEST EXECUTION. SUCH RESTITUTION AND INTEREST SHALL BE PROVIDED TO EACH CUSTOMER WITHIN 60 DAYS OF THE ACCEPTANCE OF THIS AWC BY THE ASSOCIATION,\*See FAQ #1\*

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<b>Reporting Source:</b>	Firm
<b>Current Status:</b>	Final
<b>Allegations:</b>	A MARKET REGULATION DEPARTMENT TRADING AND MARKET MAKING



SURVEILLANCE EXAMINATION WAS CONDUCTED FROM JUNE 8, 1997 THROUGH JUNE 30, 1997. THE STAFF FOUND POTENTIAL VIOLATIONS OF NASD RULE 4632 AND 6130; ACT RULE 6130, SEC RULE 17A-3(A)(6); NASD CONDUCT RULE 3110 AND MARKETPLACE RULE 4632(F)(2); NASD RULE 2320; AND NASD CONDUCT RULE 3010.

**Initiated By:** NASDR

**Date Initiated:** 09/02/1998

**Docket/Case Number:** ETR07-9700170

**Principal Product Type:** Equity - OTC

**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:** Censure

**Other Sanction(s)/Relief Sought:** \$7500 FINE  
RESTITUTION ON WRITTEN SUPERVISORY PROCEDURES

**Resolution:** Settled

**Resolution Date:** 01/27/1999

**Sanctions Ordered:** Censure  
Monetary/Fine \$7,500.00

**Other Sanctions Ordered:**

**Sanction Details:** ROBINSON-HUMPHREY WILL ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN SUPERVISORY PROCEDURES REASONABLY DESIGNED TO ACHIEVE FUTURE COMPLIANCE WITH EACH OF THE FOLLOWING AREAS: (1) BEST EXECUTION (2) LIMIT ORDER PROTECTION INTERPRETATION (3) SEC'S ORDER HANDLING RULES (4) RULES RELATING TO LOCKED AND CROSSED MARKETS (5) USE OF THE SMALL ORDER EXECUTION SYSTEM; AND (6) THE ISSUES CONCERNING ANTI-COMPETITIVE PRACTICES THAT WERE RAISED BY THE SEC IN ITS 21(A) REPORT CONCERNING THIS ASSOCIATION.

**Firm Statement** WITHOUT ADMITTING OR DENYING LIABILITY AND WITHOUT A HEARING ROBINSON-HUMPHREY CONSENTED TO FINDINGS THAT IT VIOLATED NASD RULES 4632 AND 6130 AND AGREED TO A CENSURE, TO PAY A \$7500.00 FINE, TO PAY RESTITUTION TO CERTAIN CUSTOMERS AND TO ESTABLISH, MAINTAIN AND ENFORCE REVISED WRITTEN SUPERVISORY PROCEDURES TO ENSURE FUTURE COMPLIANCE.

#### Disclosure 7 of 14

**Reporting Source:** Regulator



**Current Status:** Final

**Allegations:**

**Initiated By:** NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

**Date Initiated:** 12/15/1998

**Docket/Case Number:** CMS980106 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:** 12/15/1998

**Sanctions Ordered:** Censure  
Monetary/Fine \$5,000.00

**Other Sanctions Ordered:**

**Sanction Details:**

**Regulator Statement** LETTER OF ACCEPTANCE, WAIVER AND CONSENT NO. CMS980106 AWC.

ON DECEMBER 15, 1998, THE ROBINSON-HUMPHREY CO., INC. (RHCO) WAS NOTIFIED THAT THE LETTER OF ACCEPTANCE, WAIVER AND CONSENT (AWC) IT SUBMITTED WAS ACCEPTED BY NASD REGULATION, INC.'S DEPARTMENT OF ENFORCEMENT AND THE NATIONAL ADJUDICATORY COUNCIL. THE AWC ALLEGES THAT THE FOLLOWING VIOLATIONS OCCURRED:

RHCO FAILED TO DESIGNATE AS LATE TO ACT EIGHT TRANSACTIONS IN NASDAQ NATIONAL MARKET SECURITIES; FAILED TO IDENTIFY TO ACT NINE AGGREGATED TRANSACTIONS IN NASDAQ NATIONAL MARKET SECURITIES; INCORRECTLY IDENTIFIED TO ACT ONE TRANSACTION REPORT AS AGGREGATED IN A NASDAQ NATIONAL MARKET SECURITY; FAILED TO REPORT TO ACT THE TIME OF EXECUTION IN FOUR TRANSACTIONS IN NASDAQ NATIONAL MARKET SECURITIES; FAILED TO REPORT TO ACT THE CORRECT VOLUME IN TWO TRANSACTIONS IN NASDAQ NATIONAL MARKET SECURITIES; FAILED TO REPORT TO ACT THE



CORRECT  
SYMBOL INDICATING, IN 111 TRANSACTIONS, WHETHER EACH SUCH TRANSACTION WAS EXECUTED AS PRINCIPAL OR AGENT; AND FAILED TO REPORT TO ACT THE OEID FIRM IN 338 SEPARATE AND DISTINCT TRANSACTIONS. THIS CONDUCT CONSTITUTES SEPARATE AND DISTINCT VIOLATIONS OF NASD MARKETPLACE RULES 4632(a), 4632(c)(2), 4632(F) 4632(f)(2), 6130(d)(7), 6130(d)(10) AND NASD CONDUCT RULE 2110.

RHCO WAS CENSURED AND FINED \$5,000.

\*\*\*\*\* \$5,000 PAID ON 2/23/99 - INVOICE NO. 99-MS-84 \*\*\*\*\*

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<b>Reporting Source:</b>	Firm
<b>Current Status:</b>	Final
<b>Allegations:</b>	CHARGES STEM FROM THE 1996 TRADING AND MAKET MAKING SURVEILLANCE AUDIT BY THE NASDR'S MARKET REGULATION DEPARTMENT STAFF WHICH REIEWED TWO HUNDRED FIFTY (250)TRANSACTIONS WHICH ROBINSON-HUMPHREY REPORTED TO THE AUTOMATED CONFIRMATION TRANSACTION SERVICE ("ACT") ON TRADE DATE APRIL 3, 1996.
<b>Initiated By:</b>	NASDR
<b>Date Initiated:</b>	12/15/1998
<b>Docket/Case Number:</b>	CMS 980106 AWC
<b>Principal Product Type:</b>	Equity - OTC
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Censure
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Settled
<b>Resolution Date:</b>	12/15/1998
<b>Sanctions Ordered:</b>	Monetary/Fine \$5,000.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS OF VIOLATIONS, ROBINSON-HUMPHREY SUBMITTED AN AWC PROVIDING FOR CENSURE



AND FINE OF \$5,000.

## Firm Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS OF VIOLATIONS TO MARKETPLACE RULE 4632 AND 6130, ROBINSON-HUMPHREY SUBMITTED AN AWC PROVIDING FOR CENSURE AND FINE OF \$5,000.

## Disclosure 8 of 14

**Reporting Source:** Regulator

**Current Status:** Final

**Allegations:** SEC INSTITUTED PROCEEDINGS AGAINST 28 NASDAQ MARKET MAKING FIRMS PURSUANT TO SECTIONS 15(B) AND 21C OF THE SECURITIES EXCHANGE ACT OF 1934 AND, AS TO 1 FIRM, PURSUANT TO SECTION 203(K) OF THE INVESTMENT ADVISERS ACT OF 1940. AS A NASDAQ MARKET MAKER, RHC ENGAGED IN THE FOLLOWING: FRAUDULENT COORDINATION OF QUOTE MOVEMENTS; UNDISCLOSED ARRANGEMENTS TO COORDINATE QUOTATIONS; FAILURE TO REASONABLY SUPERVISE NASDAQ TRADING; AND UNLAWFUL PROFITS AND OTHER GAINS.

**Initiated By:** SECURITIES AND EXCHANGE COMMISSION

**Date Initiated:** 01/11/1999

**Docket/Case Number:**

**Principal Product Type:** No Product

**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:**

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

**Resolution:** Decision & Order of Offer of Settlement

**Resolution Date:** 01/11/1999

**Sanctions Ordered:** Monetary/Fine \$150,000.00  
Disgorgement/Restitution  
Suspension  
Cease and Desist/Injunction  
Bar

**Other Sanctions Ordered:**

**Sanction Details:** THE ENTRY OF ORDERS WHICH IMPOSE CIVIL MONETARY PENALTIES, DISGORGEMENT OF WRONGFUL GAINS, SUSPENSIONS OR BARS, CEASE AND DESIST ORDERS AND OTHER SANCTIONS.



## Regulator Statement

[TOP] 2/11/99 SEC NEWS DIGEST, ISSUE NO. 99-6, 1/11/99: SEC INSTITUTED PROCEEDINGS AGAINST 28 NASDAQ MARKET MAKING FIRMS PURSUANT TO SECTIONS 15(B) AND 21C OF THE SECURITIES EXCHANGE ACT OF 1934 AND, AS TO 1 FIRM, PURSUANT TO SECTION 203(K) OF THE INVESTMENT ADVISERS ACT OF 1940. ALL RESPONDENTS CONSENTED, WITHOUT ADMITTING OR DENYING THE FINDINGS, TO THE ENTRY OF ORDERS WHICH IMPOSE CIVIL MONETARY PENALTIES, DISGORGEMENT OF WRONGFUL GAINS, SUSPENSIONS OR BARS, CEASE AND DESIST ORDERS AND OTHER SANCTIONS. (RELS. 34-40900 THROUGH 34-40930, INCLUSIVE; IA-1781; FILE NO. 3-9803); (PRESS REL. 99-2) \*\*\*

2/11/99 SEC ADMINISTRATIVE PROCEEDING FILE NO. 3-9803 1/11/99; SEC INSTITUTED PROCEEDINGS AGAINST THE ROBINSON-HUMPHREY COMPANY, LLC (RHC), WHO SUBMITTED AN OFFER OF SETTLEMENT, WHICH SEC ACCEPTED. SEC FINDS THE FOLLOWING: RHC TRADED NASDAQ STOCKS FOR ITS OWN ACCOUNTS AND FOR THE ACCOUNTS OF INSTITUTIONAL AND RETAIL INVESTORS. AS A NASDAQ MARKET MAKER, RHC ENGAGED IN THE FOLLOWING: FRAUDULENT COORDINATION OF QUOTE MOVEMENTS; UNDISCLOSED ARRANGEMENTS TO COORDINATE QUOTATIONS; FAILURE TO REASONABLY SUPERVISE NASDAQ TRADING; AND UNLAWFUL PROFITS AND OTHER GAINS. IT IS ORDERED, PURSUANT TO SECTIONS 15(B) AND 21C OF THE EXCHANGE ACT, THAT: RHC SHALL CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATION OF OR FUTURE VIOLATION OF, SECTIONS 15(C)(1) AND (2) OF THE EXCHANGE ACT, AND RULES 15C1-2 AND 15C2-7; SHALL, PAY A CIVIL PENALTY OF \$150,000.00 WITHIN 10 BUSINESS DAYS; SHALL, PAY DISGORGEMENT OF \$1,786.00 WITHIN 10 BUSINESS DAYS PURSUANT TO SECTION 21C(E) OF THE EXCHANGE ACT; AND SHALL, WITHIN 90 DAYS OF THE DATE OF THE ENTRY OF THIS ORDER, PROVIDE TO THE INDEPENDENT CONSULTANT APPOINTED BY SEC IN CONNECTION WITH THESE PROCEEDINGS A DESCRIPTION OF ITS POLICIES, PROCEDURES AND PRACTICES RELATING TO PREVENTION OR DETECTION OF THE TYPES OF IMPROPER CONDUCT. (REL. NO. 34-40924, FILE NO. 3-9803)

## Disclosure 9 of 14

<b>Reporting Source:</b>	Regulator
<b>Current Status:</b>	Final
<b>Allegations:</b>	
<b>Initiated By:</b>	NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
<b>Date Initiated:</b>	06/09/1998
<b>Docket/Case Number:</b>	C8A980038





**Principal Product Type:**

**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:**

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

**Resolution:** Acceptance, Waiver & Consent(AWC)

**Resolution Date:** 06/09/1998

**Sanctions Ordered:** Censure  
Monetary/Fine \$7,500.00

**Other Sanctions Ordered:**

**Sanction Details:**

**Regulator Statement**

ON JUNE 9, 1998, DISTRICT NO. 8 NOTIFIED RESPONDENT THE ROBINSON-HUMPHREY COMPANY, LLC, NANCY S. STUDSTILL, AND LYNN W. MCAMIS THAT THE LETTER OF ACCEPTANCE, WAIVER AND CONSENT NO. C8A980038 WAS ACCEPTED; THEREFORE, RESPONDENTS MEMBER AND MCAMIS ARE CENSURED AND FINED \$7,500, JOINTLY AND SEVERALLY AND STUDSTILL IS CENSURED AND FINED \$5,000 - (NASD RULES 2110 AND 3010 - RESPONDENT STUDSTILL SOLD SHARES OF SECURITIES THAT TRADED AT A PREMIUM IN THE IMMEDIATE AFTERMARKET TO A RESTRICTED PERSON IN CONTRAVENTION OF THE BOARD OF GOVERNORS' FREE-RIDING AND WITHHOLDING INTERPRETATION; AND, RESPONDENT MEMBER, ACTING THROUGH RESPONDENT MCAMIS, FAILED TO ESTABLISH, MAINTAIN AND/OR ENFORCE WRITTEN SUPERVISORY PROCEDURES, OR TO OTHERWISE ADEQUATELY SUPERVISE RESPONDENT STUDSTILL TO PREVENT THE OCCURRENCE OF SUCH VIOLATIONS).

\*\*\* \$7,500 PAID J&S ON 7/31/98, INVOICE NO. 98-8A-558 \*\*\*

**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** NANCY STUDSTILL, A BROKER IN ROBINSON-HUMPHRYE'S JACKSONVILLE OFFICE, MADE SALES OF HOT ISSUES TO RESTRICTED PERSONS IN



VIOLATION OF CONDUCT RULE 2110 FREERIDING AND WITHHOLDING AND THAT ROBINSON-HUMPHREY, THROUGH LYNN MCAMIS, FAILED TO ESTABLISH, MAINTAIN AND/OR ENFORCE WRITTEN SUPERVISORY PROCEDURES TO PREVENT THE OCCURRENCE OF THIS CONDUCT.

<b>Initiated By:</b>	NASDR
<b>Date Initiated:</b>	04/03/1998
<b>Docket/Case Number:</b>	AWC NO. C8A9800
<b>Principal Product Type:</b>	Equity Listed (Common & Preferred Stock)
<b>Other Product Type(s):</b>	EQUITY - OTC HOT ISSUES
<b>Principal Sanction(s)/Relief Sought:</b>	Censure
<b>Other Sanction(s)/Relief Sought:</b>	FINE
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Resolution Date:</b>	06/09/1998
<b>Sanctions Ordered:</b>	Censure
<b>Other Sanctions Ordered:</b>	FINES OF \$5,000 AND \$7,500
<b>Sanction Details:</b>	NANCY STUDSTILL - CENSURE AND \$5,000 FINE. ROBINSON-HUMPHREY AND LYNN MCAMIS - CENSURES AND A JOINT AND SEVERAL FINE OF \$7,500.
<b>Firm Statement</b>	STUDSTILL, MCAMIS AND ROBINSON-HUMPHREY ENTERED INTO AN AWC ON 06/09/1998 IN WHICH STUDSTILL CONSENTED TO A CENSURE AND FINE OF \$5,000; AND ROBINSON-HUMPHREY AND LYNN MCAMIS CONSENTED TO CENSURES AND A JOINT AND SEVERAL FINE OF \$7,500.

#### Disclosure 10 of 14

<b>Reporting Source:</b>	Regulator
<b>Current Status:</b>	Final
<b>Allegations:</b>	
<b>Initiated By:</b>	NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
<b>Date Initiated:</b>	12/08/1997
<b>Docket/Case Number:</b>	CMS970058 AWC
<b>Principal Product Type:</b>	

**Other Product Type(s):****Principal Sanction(s)/Relief Sought:****Other Sanction(s)/Relief Sought:****Resolution:** Acceptance, Waiver & Consent(AWC)**Resolution Date:** 12/08/1997**Sanctions Ordered:** Monetary/Fine \$1,000.00**Other Sanctions Ordered:****Sanction Details:****Regulator Statement** LETTER OF ACCEPTANCE, WAIVER AND CONSENT NO. CMS970058 AWC.

ON DECEMBER 8, 1997, THE ROBINSON-HUMPHREY COMPANY, INC. (RHCO) WAS NOTIFIED THAT THE LETTER OF ACCEPTANCE, WAIVER AND CONSENT (AWC) IT SUBMITTED WAS ACCEPTED BY THE NASD REGULATION, INC.'S DEPARTMENT OF ENFORCEMENT AND THE NATIONAL BUSINESS CONDUCT COMMITTEE. THE AWC ALLEGES THAT RHCO VIOLATED NASD CONDUCT RULE 3350 FOR EXECUTING A SHORT SALE TRANSACTION IN A NASDAQ NATIONAL MARKET SYSTEM SECURITY AT OR BELOW THE CURRENT INSIDE BID WHEN THE CURRENT INSIDE BID WAS BELOW THE PRECEDING BID IN THE SECURITY.

RHCO WAS FINED \$1,000 AND AGREED TO A REMITTAL OF ITS COMMISSION FROM THE TRANSACTION OF \$625.

\*\*\*\*\* \$1,625 PAID ON 1/28/98, INVOICE NO. 98-MS-156 \*\*\*\*

**Reporting Source:** Firm**Current Status:** Final**Allegations:** THE NASD ALLEGES THAT THE FIRM EXECUTED ONE SHORT SALE AT OR BELOW THE CURREN5T BID, WHEN THE CURRENT BID WAS BELOW THE PRECEDING BID.**Initiated By:** NASD



**Date Initiated:** 12/08/1997

**Docket/Case Number:** CMS 970058 AWC

**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:** 12/08/1997

**Sanctions Ordered:** Censure  
Monetary/Fine \$1,625.00

**Other Sanctions Ordered:**

**Sanction Details:** ROBINSON-HUMPHREY CONSENTED, WITHOUT ADMITTING OR DENYING THE ALLEGATIONS TO A CENSURE AND FINE OF \$1625.00.

**Firm Statement** ROBINSON-HUMPHREY CONSENTED, WITHOUT ADMITTING OR DENYING THE ALLEGATIONS TO A CENSURE AND FINE OF \$1625.00.

#### Disclosure 11 of 14

**Reporting Source:** Regulator

**Current Status:** Final

**Allegations:**

**Initiated By:** NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

**Date Initiated:** 04/23/1997

**Docket/Case Number:** CMS960198

**Principal Product Type:**

**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:**

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

**Resolution:** Acceptance, Waiver & Consent(AWC)



**Resolution Date:** 04/23/1997

**Sanctions Ordered:** Monetary/Fine \$3,000.00

**Other Sanctions Ordered:**

**Sanction Details:**

**Regulator Statement** LETTER OF ACCEPTANCE, WAIVER & CONSENT NO. CMS960198 AWC.

ON APRIL 23, 1997, THE ROBINSON HUMPHREY COMPANY, INC. (RHCO) WAS NOTIFIED THAT THE LETTER OF ACCEPTANCE, WAIVER AND CONSENT (AWC) IT SUBMITTED WAS ACCEPTED BY THE MARKET REGULATION AND THE NATIONAL BUSINESS CONDUCT COMMITTEES. THE AWC ALLEGES THAT RHCO VIOLATED SEC RULE 10b-6A FOR THE FOLLOWING PASSIVE MARKET MAKING ACTIVITIES: ON MAY 22, 1996, RHCO A PASSIVE MARKET MAKER IN THE COMMON STOCK OF CSTF, ENTERED A BID WHICH WAS ABOVE THE HIGHEST INDEPENDENT BID IN THAT SECURITY; RHCO PURCHASED SHARES OF CSTF AT PRICES WHICH EXCEEDED THE HIGHEST INDEPENDENT BID FOR THAT SECURITY AT THE TIME OF THE TRANSACTION; ON MAY 30, 1996, RHCO, A PASSIVE MARKET MAKER IN THE COMMON STOCK OF PNET, ENTERED A BID IN PNET WHICH WAS ABOVE THE HIGHEST INDEPENDENT BID IN THAT SECURITY; AND, WHILE AT THE HIGH BID, RHCO BOUGHT SHARES OF PNET THROUGH SOES.

RHCO WAS FINED \$3,000 AND REQUIRED TO CONDUCT A RULE EDUCATION CLASS FOR ITS TRADERS.

\*\*\*\$3,000.00 PAID ON 6/6/97, INVOICE #97-MS-430\*\*\*

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** ROBINSON-HUMPHREY WHILE ENGAGED IN PASSIVE MARKET MAKING ALLEGEDLY VIOLATED RULE 10B-6A BY ENTERING A BID ABOVE THE HIGHEST INDEPENDENT BID AND PURCHASING SHARES AT A PRICE EXCEEDING THE HIGHEST INDEPENDENT BID ON MAY 22, 1996 AND MAY 30, 1996.

**Initiated By:** NASD

**Date Initiated:** 04/23/1997



<b>Docket/Case Number:</b>	AWC CMS 960198
<b>Principal Product Type:</b>	Equity - OTC
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Civil and Administrative Penalt(ies) /Fine(s)
<b>Other Sanction(s)/Relief Sought:</b>	CONSENTED TO A \$3,000.00 FINE AND TO CONDUCT A RULE EDUCATION CLASS FOR ITS TRADERS.
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Resolution Date:</b>	04/23/1997
<b>Sanctions Ordered:</b>	Monetary/Fine \$3,000.00
<b>Other Sanctions Ordered:</b>	AGREED TO CONDUCT A RULE EDUCATION CLASS FOR ITS TRADERS.
<b>Sanction Details:</b>	ROBINSON-HUMPHREY CONSENTED TO A \$3,000 FINE AND AGREED TO CONDUCT A RULE EDUCATION CLASS FOR ITS TRADERS.
<b>Firm Statement</b>	ROBINSON-HUMPHREY SUBMITTED A LETTER OF ACCEPTANCE, WAIVER AND CONSENT ("AWC") WHICH WAS ACCEPTED BY THE NASD'S MARKET REGULATION COMMITTEE ON APRIL 23, 1997. THE AWC ALLEGED THAT ROBINSON-HUPHREY VIOLATED SECURITIES EXCHANGE ACT RULE 10B-6A BY ENTERING A BID ABOVE THE HIGHEST INDEPENDENT BID AND PURCHASING SHARES AT A PRICE EXCEEDING THE HIGHEST INDEPENDENT BID.

#### Disclosure 12 of 14

<b>Reporting Source:</b>	Regulator
<b>Current Status:</b>	Final
<b>Allegations:</b>	ROBINSON-HUMPHREY FAILED REASONABLY TO SUPERVISE THE REPRESENTATIVE IN THAT IT FAILED TO HAVE IN PLACE POLICIES AND PROCEDURES TO DELINEATE HOW THOSE PERSON RESPONSIBLE FOR THE SUPERVISION OF BRANCH MANAGERS WOULD OVERSEE THE BRANCH MANAGER'S COMPLIANCE AND SUPERVISORY FUNCTIONS. (REL 34-36773)
<b>Initiated By:</b>	SECURITIES AND EXCHANGE COMMISSION
<b>Date Initiated:</b>	01/25/1996
<b>Docket/Case Number:</b>	
<b>Principal Product Type:</b>	No Product

**Other Product Type(s):****Principal Sanction(s)/Relief Sought:****Other Sanction(s)/Relief Sought:****Resolution:** Decision & Order of Offer of Settlement**Resolution Date:** 01/25/1996**Sanctions Ordered:** Censure**Other Sanctions Ordered:**

**Sanction Details:** ON JANUARY 25, 1996, ROBINSON-HUMPHREY AND EFFINGER WERE CENSURED BY THE SEC. ROBINSON-HUMPHREY COMPANY, INC. IN ITS OFFER OF SETTLEMENT WITH THE SEC ALSO UNDERTOOK TO COMPLY WITH ITS UNDERTAKINGS WITH THE SEC REGARDING REVIEW OF ITS POLICIES AND PROCEDURES.

**Regulator Statement**

[TOP] 01-31-96, SEC NEWS DIGEST NO. 96-15, JANUARY 29, 1996; ON JANUARY 25, THE COMMISSION INSTITUTED PUBLIC ADMINISTRATIVE PROCEEDINGS AND ISSUED AN ORDER MAKING FINDINGS AND IMPOSING SANCTIONS AGAINST THE ROBINSON-HUMPHREY COMPANY, INC. (ROBINSON-HUMPHREY) AND WILLIAM L. EFFINGER, III. THE COMMISSION SIMULTANEOUSLY ACCEPTED ROBINSON-HUMPHREY'S AND EFFINGER'S OFFERS OF SETTLEMENT. ROBINSON-HUMPHREY AND EFFINGER CONSENTED, WITHOUT ADMITTING OR DENYING THE COMMISSION'S FINDINGS, TO AN ORDER REQUIRING ROBINSON-HUMPHREY TO ENGAGE AN INDEPENDENT CONSULTANT TO REVIEW AND, IF NECESSARY, REVISE ROBINSON-HUMPHREY'S POLICIES AND PROCEDURES CONCERNING THE SUPERVISION OF ITS BRANCH MANAGERS. THE COMMISSION FOUND THAT, BETWEEN JANUARY, 1988 AND MAY, 1990, EFFINGER FAILED REASONABLY TO SUPERVISE A REGISTERED REPRESENTATIVE, SUBJECT TO HIS SUPERVISION, WHO MISAPPROPRIATED \$2.4 MILLION FROM CUSTOMERS OF ROBINSON-HUMPHREY. ROBINSON-HUMPHREY FAILED REASONABLY TO SUPERVISE THE REPRESENTATIVE IN THAT IT FAILED TO HAVE IN PLACE POLICIES AND PROCEDURES TO DELINEATE HOW THOSE PERSON RESPONSIBLE FOR THE SUPERVISION OF BRANCH MANAGERS WOULD OVERSEE THE BRANCH MANAGER'S COMPLIANCE AND SUPERVISORY FUNCTIONS. (REL 34-36773)

6/18/96 SEC DOCKET VOL. 61 NO.3, PAGE 0514, FEBRUARY 20, 1996, DISCLOSES; THE SEC ORDER INSTITUTING PUBLIC ADMINISTRATIVE PROCEEDINGS PURSUANT TO SECTIONS 15(B) AND 19(H) OF THE SECURITIES EXCHANGE ACT OF 1934, MAKING FINDINGS AND IMPOSING REMEDIAL SANCTIONS. ON JANUARY 25, 1996, ROBINSON-HUMPHREY AND EFFINGER WERE CENSURED BY THE SEC. ROBINSON-HUMPHREY



COMPANY, INC. IN ITS OFFER OF SETTLEMENT WITH THE SEC ALSO UNDERTOOK TO COMPLY WITH ITS UNDERTAKINGS WITH THE SEC REGARDING REVIEW OF ITS POLICIES AND PROCEDURES.

<b>Reporting Source:</b>	Firm
<b>Current Status:</b>	Final
<b>Allegations:</b>	THE ROBINSON-HUMPHREY COMPANY, INC. AND WILLIAM L. EFFINGER, III FAILED TO REASONABLY SUPERVISE A REGISTERED REPRESENTATIVE WHO MISAPPROPRIATED MONEYS FROM CUSTOMERS OF THE ROBINSON-HUMPHREY COMPANY, INC.
<b>Initiated By:</b>	SECURITIES AND EXCHANGE COMMISSION
<b>Date Initiated:</b>	01/25/1996
<b>Docket/Case Number:</b>	FILE NO. 3-8939; 34-36773
<b>Principal Product Type:</b>	Equity Listed (Common & Preferred Stock)
<b>Other Product Type(s):</b>	EQUITY - OTC DEBT - MUNICIPAL DIRECT INVESTMENT(S) - DDP & LP INVESTMENT(S)
<b>Principal Sanction(s)/Relief Sought:</b>	Censure
<b>Other Sanction(s)/Relief Sought:</b>	REGISTRANT - CENSURE AND UNDERTAKING TO HIRE INDEPENDENT CONSULTANT TO REVIEW SUPERVISORY PROCEDURES AND TO ADOPT REASONABLE RECOMMENDATIONS. WILLIAM L. EFFINGER, III - CENSURE AND SUSPENSION FROM SERVING IN SUPERVISORY AND PROPRIETARY CAPACITY FOR PERIOD OF 12 MONTHS.
<b>Resolution:</b>	Settled
<b>Resolution Date:</b>	01/25/1996
<b>Sanctions Ordered:</b>	Censure
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	REGISTRANT - CENSURE AND UNDERTAKING TO HIRE INDEPENDENT CONSULTANT TO REVIEW SUPERVISORY PROCEDURES AND TO ADOPT REASONABLE RECOMMENDATIONS. WILLIAM L. EFFINGER, III - CENSURE AND SUSPENSION FROM SERVING IN SUPERVISORY AND PROPRIETARY CAPACITY FOR PERIOD OF 12 MONTHS.
<b>Firm Statement</b>	SETTLED ON JANUARY 25, 1996. REGISTRANT - CENSURE AND UNDERTAKING TO HIRE INDEPENDENT CONSULTANT TO REVIEW SUPERVISORY PROCEDURES AND TO ADOPT REASONABLE RECOMMENDATIONS. WILLIAM L. EFFINGER, III - CENSURE AND





SUSPENSION FROM SERVING IN SUPERVISORY AND PROPRIETARY  
CAPACITY FOR PERIOD OF 12 MONTHS.

**Disclosure 13 of 14**

<b>Reporting Source:</b>	Regulator
<b>Current Status:</b>	Final
<b>Allegations:</b>	VIOLATIONS OF ARTICLE III, SECTIONS 1 AND 27 OF RULES OF FAIR PRACTICE, IN CONTRAVENTION OF THE BOARD OF GOVERNORS FREE-RIDING AND WITHHOLDING INTERPRETATION.
<b>Initiated By:</b>	NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
<b>Date Initiated:</b>	04/24/1995
<b>Docket/Case Number:</b>	C07950027
<b>Principal Product Type:</b>	Equity Listed (Common & Preferred Stock)
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Decision & Order of Offer of Settlement
<b>Resolution Date:</b>	09/19/1995
<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$2,500.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	\$2,500.00 PAID ON 10/13/95
<b>Regulator Statement</b>	[TOP] COMPLAINT NO. C07950027 FILED 4/24/95 BY DISTRICT NO. 7 AGAINST THE ROBINSON-HUMPHREY COMPANY, LEE GREGORY DIAMOND, SMITH BARNEY INC., RICHARD P CALLAHAN, TERRANCE RAVENSCRAFT, CHRISTOPHER ASLANIAN ALLEGING VIOLATIONS OF ARTICLE III, SECTIONS 1 AND 27 OF RULES OF FAIR PRACTICE, IN CONTRAVENTION OF THE BOARD OF GOVERNORS FREE-RIDING AND WITHHOLDING INTERPRETATION, SMITH BARNEY AND ROBINSON-HUMPHREY ACTING THROUGH CALLAHAN AND RAVENSCRAFT SOLD SHARES OF NEW ISSUES THAT TRADED AT A PREMIUM IN THE IMMEDIATE AFTERMARKET TO ASLANIAN, DIAMOND AND INVESTMENT PARTNERSHIPS; ROBINSON-HUMPHREY FAILED TO INQUIRE INTO THE BENEFICIAL OWNERSHIP OF THE INVESTMENT PARTNERSHPS AND FAILED TO OBTAIN RECORDS



THEREOF AS REQUIRED BY THE INTERPRETATION; SUBMITTED INACCURATE FREE-RIDING AND WITHHOLDING QUESTIONNAIRES IN THAT IT FAILED TO DISCLOSE THAT IT WAS THE MANAGING UNDERWRITER OF A PARTICULAR OFFERING; AND, INACCURATELY REPORTED THE NUMBER OF SHARES OF COMMON STOCK SOLD TO BANKS, TRUST COMPANIES AND OTHER CONDUITS, AS WELL AS TO INVESTMENT PARTNERSHIPS AND CORPORATIONS; AND, RESPONDENT SMITH BARNEY FAILED TO ESTABLISH OR MAINTAIN SUPERVISORY PROCEDURES ADEQUATE TO ASSURE COMPLIANCE WITH THE INTERPRETATION BY ROBINSON-HUMPHREY OR SMITH BARNEY.

ON 9/19/95, THE DECISION AND ORDER OF ACCEPTANCE OF OFFER OF SETTLEMENT SUBMITTED BY SMITH BARNEY INC. WAS ISSUED:

THEREFORE, RESPONDENT MEMBER IS CENSURED AND FINED \$7,500.

ON 9/19/95, THE DECISION AND ORDER OF ACCEPTANCE OF OFFER OF SETTLEMENT SUBMITTED BY THE ROBINSON-HUMPHREY COMPANY, INC. WAS ISSUED: THEREFORE, RESPONDENT MEMBER IS CENSURED AND FINED \$2,500.

\*\*\$2,500.00 PAID ON 10/13/95, INCIDENT# 95-07-618\*\*

ON 12/6/95, THE DECISION AND ORDER OF ACCEPTANCE OF OFFER OF SETTLEMENT SUBMITTED BY RAVENSCRAFT WAS ISSUED: THEREFORE, HE IS CENSURED AND FINED \$1,330.85.

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<b>Reporting Source:</b>	Firm
<b>Current Status:</b>	Final
<b>Allegations:</b>	ALLEGED VIOLATIONS OF ARTICLE III, SECTION I OF THE RULES OF FAIR PRACTICE (FREE-RIDING AND WITHHOLDING).
<b>Initiated By:</b>	NASDR
<b>Date Initiated:</b>	04/24/1995
<b>Docket/Case Number:</b>	C07950027
<b>Principal Product Type:</b>	Equity Listed (Common & Preferred Stock)
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Censure
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Resolution Date:</b>	09/19/1995



<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$2,500.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	SALOMON SMITH BARNEY AND ROBINSON-HUMPHREY DETERMINED TO SUBMIT A LETTER OF ACCEPTANCE, WAIVER AND CONSENT WITHOUT ADMITTING OR DENYING THE ALLEGATIONS.
<b>Firm Statement</b>	THE NASD DETERMINED TO ACCEPT THE AWC ON SEPTEMBER 19, 1995 PURSUANT TO THE SETTLEMENT SALOMON SMITH BARNEY WAS CENSURED AND FINED \$7500.00 AND ROBINSON-HUMPHREY WAS CENSURED AND FINED \$2500.00.

**Disclosure 14 of 14**

<b>Reporting Source:</b>	Regulator
<b>Current Status:</b>	Final
<b>Allegations:</b>	
<b>Initiated By:</b>	NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
<b>Date Initiated:</b>	06/20/1994
<b>Docket/Case Number:</b>	C07940028
<b>Principal Product Type:</b>	
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Resolution Date:</b>	06/20/1994
<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$12,500.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	
<b>Regulator Statement</b>	ON JUNE 20, 1994, DISTRICT NO. 7 NOTIFIED THE ROBINSON-HUMPHREY COMPANY, INC., THEODORE J. BENDER, III, AND RODERICK A. DOWLING THAT THE LETTER OF ACCEPTANCE, WAIVER AND CONSENT NO. C07940028 WAS ACCEPTED; THEREFORE, RESPONDENTS MEMBER



AND  
 BENDER ARE CENSURED AND FINED \$7,500, JOINTLY AND SEVERALLY,  
 RESPONDENTS MEMBER AND DOWLING ARE CENSURED AND FINED  
 \$5,000,  
 JOINTLY AND SEVERALLY; AND, RESPONDENT BENDER IS REQUIRED TO  
 SIT FOR AND PASS THE SERIES 24 EXAMINATION NO LATER THAN 60  
 DAYS FOLLOWING THE APPROVAL OF THIS AWC. IF RESPONDENT BENDER  
 DOES NOT PASS THE SERIES 24 EXAMINATION BY THAT DATE, HE SHALL  
 THENCEFORTH BE SUSPENDED FROM SERVING IN ANY PRINCIPAL  
 CAPACITY  
 UNTIL SUCH TIME AS HE PASSES THAT EXAMINATION - (ARTICLE III,  
 SECTION 1 OF THE RULES OF FAIR PRACTICE - RESPONDENT MEMBER  
 FAILED TO CAUSE RESPONDENTS BENDER AND DOWLING TO BECOME  
 QUALIFIED AS GENERAL SECURITIES PRINCIPALS).

\*\*\$5,000 J&S(2) PAID ON 8/15/94 INVOICE #94-07-450. \$7,500  
 J&S(1) PAID ON 8/15/94 INVOICE #94-07-449.\*\*

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<b>Reporting Source:</b>	Firm
<b>Current Status:</b>	Final
<b>Allegations:</b>	THE ROBINSON-HUMPHREY COMPANY, INC. FAILED TO CAUSE TWO MEMBERS OF ITS BOARD OF DIRECTORS TO QUALIFY AS PRINCIPALS BY TAKING THE SERIES 24 EXAMINATION.
<b>Initiated By:</b>	NASD
<b>Date Initiated:</b>	06/02/1994
<b>Docket/Case Number:</b>	C07940028AWC
<b>Principal Product Type:</b>	Other
<b>Other Product Type(s):</b>	SERIES 24 REGISTRATION
<b>Principal Sanction(s)/Relief Sought:</b>	Censure
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Other
<b>Resolution Date:</b>	06/20/1994
<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$5,000.00



**Other Sanctions Ordered:**

**Sanction Details:**

ROBINSON-HUMPHREY AND RODERICK DOWLING - CENSURE AND A FINE OF \$5,000 JOINTLY AND SEVERALLY.  
ROBINSON-HUMPHREY AND THEODORE BENDER - CENSURE AND A FINE OF \$7,500 JOINTLY AND SEVERALLY AND BENDER AND DOWLING AGREED TO TAKE AND PASS THE SERIES 24 EXAMINATION WITHIN 60 DAYS.

**Firm Statement**

THE ROBINSON-HUMPHREY COMPANY, INC. AND RODERICK DOWLING - A CENSURE AND FINE OF \$5000.00 JOINTLY AND SEVERALLY.  
THE ROBINSON-HUMPHREY COMPANY, INC. AND THEODORE BENDER - A CENSURE AND FINE OF \$7500.00 JOINTLY AND SEVERALLY AND BENDER AND DOWLING AGREED TAKE AND PASS THE SERIES 24 EXAMINATION WITHIN 60 DAYS.



## Arbitration Award - Award / Judgment

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

The full text of arbitration awards issued by FINRA is available at [www.finra.org/awardsonline](http://www.finra.org/awardsonline).

### Disclosure 1 of 11

<b>Reporting Source:</b>	Regulator
<b>Type of Event:</b>	ARBITRATION
<b>Allegations:</b>	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT RELATED-NEGLIGENCE; ACCOUNT RELATED-OTHER; NO OTHER CONTROVERSY INVOLVED
<b>Arbitration Forum:</b>	NASD
<b>Case Initiated:</b>	02/18/2000
<b>Case Number:</b>	00-00522
<b>Disputed Product Type:</b>	UNKNOWN TYPE OF SECURITIES
<b>Sum of All Relief Requested:</b>	
<b>Disposition:</b>	AWARD AGAINST PARTY
<b>Disposition Date:</b>	09/26/2000
<b>Sum of All Relief Awarded:</b>	

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

### Disclosure 2 of 11

<b>Reporting Source:</b>	Regulator
<b>Type of Event:</b>	ARBITRATION
<b>Allegations:</b>	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-CHURNING; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-MARGIN CALLS
<b>Arbitration Forum:</b>	NASD
<b>Case Initiated:</b>	01/01/1988
<b>Case Number:</b>	88-01190



**Disputed Product Type:** NO OTHER TYPE OF SEC INVOLVE; UNKNOWN TYPE OF SECURITIES  
**Sum of All Relief Requested:** \$48,490.00  
**Disposition:** AWARD AGAINST PARTY  
**Disposition Date:** 07/18/1989  
**Sum of All Relief Awarded:** \$0.00

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

#### Disclosure 3 of 11

**Reporting Source:** Regulator  
**Type of Event:** ARBITRATION  
**Allegations:** ACCOUNT ACTIVITY-UNAUTHORIZED TRADING; NO OTHER CONTROVERSY INVOLVED  
**Arbitration Forum:** NASD  
**Case Initiated:**  
**Case Number:** 89-00369  
**Disputed Product Type:** NO OTHER TYPE OF SEC INVOLVE; UNKNOWN TYPE OF SECURITIES  
**Sum of All Relief Requested:** \$394,843.50  
**Disposition:** AWARD AGAINST PARTY  
**Disposition Date:** 02/27/1990  
**Sum of All Relief Awarded:** \$19,500.00

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

#### Disclosure 4 of 11

**Reporting Source:** Regulator  
**Type of Event:** ARBITRATION  
**Allegations:** ACCOUNT RELATED-NEGLIGENCE; NO OTHER CONTROVERSY INVOLVED; TRADING DISPUTES-OTHER  
**Arbitration Forum:** NASD  
**Case Initiated:** 11/21/1989



**Case Number:** 89-02875

**Disputed Product Type:** COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE

**Sum of All Relief Requested:** \$580,394.00

**Disposition:** AWARD AGAINST PARTY

**Disposition Date:** 12/04/1991

**Sum of All Relief Awarded:** \$1,032,193.00

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

#### Disclosure 5 of 11

**Reporting Source:** Regulator

**Type of Event:** ARBITRATION

**Allegations:** ACCOUNT ACTIVITY-CHURNING; ACCOUNT ACTIVITY-SUITABILITY; NO OTHER CONTROVERSY INVOLVED

**Arbitration Forum:** NASD

**Case Initiated:** 10/15/1990

**Case Number:** 90-02168

**Disputed Product Type:** OPTIONS; UNKNOWN TYPE OF SECURITIES

**Sum of All Relief Requested:** \$100,000.00

**Disposition:** AWARD AGAINST PARTY

**Disposition Date:** 09/09/1991

**Sum of All Relief Awarded:** \$5,000.00

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

#### Disclosure 6 of 11

**Reporting Source:** Regulator

**Type of Event:** ARBITRATION

**Allegations:** ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-NEGLIGENCE





**Arbitration Forum:** NASD  
**Case Initiated:** 03/04/1991  
**Case Number:** 91-00508  
**Disputed Product Type:** NO OTHER TYPE OF SEC INVOLVE; LIMITED PARTNERSHIPS; OPTIONS  
**Sum of All Relief Requested:** \$5,094,940.00  
**Disposition:** AWARD AGAINST PARTY  
**Disposition Date:** 03/26/1992  
**Sum of All Relief Awarded:** \$83,000.00

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

#### Disclosure 7 of 11

**Reporting Source:** Regulator  
**Type of Event:** ARBITRATION  
**Allegations:** ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-OTHER; ACCOUNT ACTIVITY-SUITABILITY; NO OTHER CONTROVERSY INVOLVED  
**Arbitration Forum:** NASD  
**Case Initiated:** 02/22/1991  
**Case Number:** 91-00570  
**Disputed Product Type:** CORPORATE BONDS; NO OTHER TYPE OF SEC INVOLVE; MUNICIPAL BOND FUNDS  
**Sum of All Relief Requested:** \$99,382.00  
**Disposition:** AWARD AGAINST PARTY  
**Disposition Date:** 11/05/1991  
**Sum of All Relief Awarded:** \$5,000.00

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

#### Disclosure 8 of 11

**Reporting Source:** Regulator  
**Type of Event:** ARBITRATION



<b>Allegations:</b>	ACCOUNT ACTIVITY-CHURNING; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-NEGLIGENCE
<b>Arbitration Forum:</b>	NASD
<b>Case Initiated:</b>	05/06/1991
<b>Case Number:</b>	91-01389
<b>Disputed Product Type:</b>	COMMON STOCK; CORPORATE BONDS; NO OTHER TYPE OF SEC INVOLVE
<b>Sum of All Relief Requested:</b>	\$179,000.00
<b>Disposition:</b>	AWARD AGAINST PARTY
<b>Disposition Date:</b>	03/26/1992
<b>Sum of All Relief Awarded:</b>	\$42,500.00

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

#### Disclosure 9 of 11

<b>Reporting Source:</b>	Regulator
<b>Type of Event:</b>	ARBITRATION
<b>Allegations:</b>	ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-OTHER; ACCOUNT RELATED-FAILURE TO SUPERVISE
<b>Arbitration Forum:</b>	NASD
<b>Case Initiated:</b>	02/21/1992
<b>Case Number:</b>	92-00545
<b>Disputed Product Type:</b>	COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE
<b>Sum of All Relief Requested:</b>	\$380,000.00
<b>Disposition:</b>	AWARD AGAINST PARTY
<b>Disposition Date:</b>	06/02/1993
<b>Sum of All Relief Awarded:</b>	\$25,000.00

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

#### Disclosure 10 of 11



**Reporting Source:** Regulator

**Type of Event:** ARBITRATION

**Allegations:** ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-CHURNING; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE

**Arbitration Forum:** NASD

**Case Initiated:** 12/22/1993

**Case Number:** 93-04335

**Disputed Product Type:** COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE

**Sum of All Relief Requested:** \$2,277,000.00

**Disposition:** AWARD AGAINST PARTY

**Disposition Date:** 12/16/1996

**Sum of All Relief Awarded:** \$90,000.00

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

#### Disclosure 11 of 11

**Reporting Source:** Regulator

**Type of Event:** ARBITRATION

**Allegations:** ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-CHURNING; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-UNAUTHORIZED TRADING

**Arbitration Forum:** NASD

**Case Initiated:** 12/22/1993

**Case Number:** 93-04557

**Disputed Product Type:** COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE; OPTIONS

**Sum of All Relief Requested:** \$424,421.62

**Disposition:** AWARD AGAINST PARTY

**Disposition Date:** 03/15/1995

**Sum of All Relief Awarded:** \$5,000.00

There may be a non-monetary award associated with this arbitration.



Please select the Case Number above to view more detailed information.

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

<b>Reporting Source:</b>	Firm
<b>Affiliate:</b>	CITICORP
<b>Current Status:</b>	Final
<b>Allegations:</b>	THE VIOLATION OCCURRED IN CONNECTION WITH CITIBANK'S ACTIVITIES AS TRANSFER AGENT AND PROPER SAFEGARDING AND DESTRUCTION OF CANCELLED SECURITIES CERTIFICATES AS WELL AS PROPER REORTING TO THE SECURITIES AND EXCHANGE COMMISSION AS ITS DESIGNEE (THE SECURITIES INFORMATION CENTER), AND THE FEDERAL BUREAU OF INVESTIGATION, UPON DISCOVERY OF THE THEFT OR LOSS OF CANCELLED SECURITIES CERTIFICATES PREVIOUSLY THOUGHT BY CITIBANK TO BE DESTROYED. THE CERTIFICATES REFERRED TO IN THE COMPTROLLER'S ORDER HAD BEEN DELIVERED BY CITIBANK TO A THIRD PARTY CONTRACTOR FOR PROPER DESTRUCTION.
<b>Initiated By:</b>	COMPTROLLER OF THE CURRENCY
<b>Date Initiated:</b>	06/25/1992
<b>Docket/Case Number:</b>	N/A
<b>Principal Product Type:</b>	Other
<b>Other Product Type(s):</b>	ACTIVITIES AS TRANSFER AGENT AND PROPER SAFEGARDING AND DESTRUCTION OF CANCELLED SECURITIES CERTIFICATES.
<b>Principal Sanction(s)/Relief Sought:</b>	Censure
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Settled
<b>Resolution Date:</b>	06/25/1992
<b>Sanctions Ordered:</b>	Censure
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	CITIBANK WAS CENSURED BY THE COMPTROLLER AND AGREE TO IMPLEMENT REMEDIAL PROCEDURES TO PREVENT REOCCURRENCE OF THE CONDUCT DESCRIBED.
<b>Firm Statement</b>	CITIBANK WAS CENSURED BY THE COMPTROLLER AND AGREE TO



IMPLEMENT REMEDIAL PROCEDURES TO PREVENT REOCCURRENCE OF THE CONDUCT DESCRIBED. NO INDIVIDUALS WERE NAMED IN THE COMPTROLLER'S ORDER - ENTITLED "IN THE MATTER OF CITIBANK, N.A. NEW YORK, NEW YORK."

## Disclosure 2 of 2

<b>Reporting Source:</b>	Firm
<b>Affiliate:</b>	CITICORP
<b>Current Status:</b>	Final
<b>Allegations:</b>	CITICORP VIOLATED CBOT REGULATION 249.01(B)(I) " FAILURE TO TIMELY FILE AN APPLICATION TO REGISTER A NEW EMPLOYEE ON BEHALF OF THE FIRM."
<b>Initiated By:</b>	CHICAGO BOARD OF TRADE ("CBOT")
<b>Date Initiated:</b>	05/24/1988
<b>Docket/Case Number:</b>	88-FIN-66
<b>Principal Product Type:</b>	Commodity Option(s)
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Other
<b>Other Sanction(s)/Relief Sought:</b>	FINE
<b>Resolution:</b>	Settled
<b>Resolution Date:</b>	07/12/1988
<b>Sanctions Ordered:</b>	Monetary/Fine \$500.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	CITICORP CONSENTED TO A FINE OF \$500.00 BUT WITHOUT EITHER ADMITTING OR DENYING THE CHARGES.
<b>Firm Statement</b>	CITICORP SUBMITTED AN OFFER OF SETTLEMENT IN CONNECTIN WITH CHARGES ISSUED BY THE BUSINESS CONDOUCT COMMITTEE ("BCC") OF THE CHICAGO BOARD OF TRADE THAT CITICORP VIOLATED CBOT REGULATION 249.01(B)(I) "FAILURE TO TIMELY FILE AN APPLICATION TO REGISTER A NEW EMPLOYEE ON BEHALF OF THE FIRM."

## End of Report



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