

BrokerCheck Report

THOMAS NICHOLAS TRKLA

CRD# 1238366

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

Please contact FINRA with any concerns.

About BrokerCheck®



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

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

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.
- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

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

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

- **How current is this information?**

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

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

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

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

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

Thank you for using FINRA BrokerCheck.



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



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

**THOMAS N. TRKLA**

CRD# 1238366

Currently employed by and registered with the following Firm(s):

B BROOKWOOD SECURITIES PARTNERS, LLC

138 Conant Street
BEVERLY, MA 01915
CRD# 35187

Registered with this firm since: 04/14/1994

Report Summary for this Broker

This report summary provides an overview of the broker's professional background and conduct. Additional information can be found in the detailed report.

Broker Qualifications

This broker is registered with:

- 1 Self-Regulatory Organization
- 37 U.S. states and territories

This broker has passed:

- 1 Principal/Supervisory Exam
- 2 General Industry/Product Exams
- 1 State Securities Law Exam

Registration History

This broker was previously registered with the following securities firm(s):

B TALLWOOD ASSOCIATES, INC.

CRD# 26527
07/1993 - 04/1994

B WINTHROP SECURITIES CO., INC.

CRD# 6925
BOSTON, MA
05/1991 - 06/1993

B RELATED EQUITIES CORPORATION

CRD# 11218
11/1987 - 09/1989

Disclosure Events

All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

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

The following types of disclosures have been reported:

Type	Count
Regulatory Event	2



Broker Qualifications

Registrations

This section provides the self-regulatory organizations (SROs) and U.S. states/territories the broker is currently registered and licensed with, the category of each license, and the date on which it became effective. This section also provides, for every brokerage firm with which the broker is currently employed, the address of each branch where the broker works.

This individual is currently registered with 1 SRO and is licensed in 37 U.S. states and territories through his or her employer.

Employment 1 of 1

Firm Name: **BROOKWOOD SECURITIES PARTNERS, LLC**

Main Office Address: **138 CONANT STREET
BEVERLY, MA 01915**

Firm CRD#: **35187**

	SRO	Category	Status	Date
B	FINRA	General Securities Principal	Approved	04/14/1994
B	FINRA	General Securities Representative	Approved	04/14/1994

	U.S. State/ Territory	Category	Status	Date
B	Arizona	Agent	Approved	11/28/1997
B	Arkansas	Agent	Approved	03/15/2017
B	California	Agent	Approved	08/18/1997
B	Connecticut	Agent	Approved	04/20/1994
B	Delaware	Agent	Approved	04/15/1994
B	District of Columbia	Agent	Approved	04/01/1994
B	Florida	Agent	Approved	05/27/1994
B	Georgia	Agent	Approved	07/16/2002
B	Hawaii	Agent	Approved	02/04/2003
B	Idaho	Agent	Approved	03/10/2017
B	Illinois	Agent	Approved	04/18/1994

Broker Qualifications



Employment 1 of 1, continued

	U.S. State/ Territory	Category	Status	Date
B	Indiana	Agent	Approved	04/08/1994
B	Iowa	Agent	Approved	03/08/2017
B	Kansas	Agent	Approved	10/31/2017
B	Maine	Agent	Approved	08/21/1997
B	Maryland	Agent	Approved	05/06/1994
B	Massachusetts	Agent	Approved	04/15/1994
B	Michigan	Agent	Approved	05/23/1994
B	Minnesota	Agent	Approved	04/18/1994
B	Missouri	Agent	Approved	03/23/2017
B	Nebraska	Agent	Approved	09/29/2017
B	Nevada	Agent	Approved	04/30/2003
B	New Hampshire	Agent	Approved	05/27/1997
B	New Jersey	Agent	Approved	06/10/1994
B	New Mexico	Agent	Approved	03/20/2017
B	New York	Agent	Approved	06/08/1994
B	Ohio	Agent	Approved	05/02/1994
B	Oklahoma	Agent	Approved	06/01/1995
B	Pennsylvania	Agent	Approved	04/21/1994
B	Rhode Island	Agent	Approved	05/05/1994
B	South Carolina	Agent	Approved	06/03/1997
B	Tennessee	Agent	Approved	09/13/2016



Broker Qualifications

Employment 1 of 1, continued

	U.S. State/ Territory	Category	Status	Date
B	Texas	Agent	Approved	06/03/1994
B	Vermont	Agent	Approved	05/13/1998
B	Virginia	Agent	Approved	04/11/1994
B	Washington	Agent	Approved	04/23/2013
B	Wisconsin	Agent	Approved	10/04/1996

Branch Office Locations

BROOKWOOD SECURITIES PARTNERS, LLC
138 CONANT STREET
BEVERLY, MA 01915

BROOKWOOD SECURITIES PARTNERS, LLC
138 Conant Street
BEVERLY, MA 01915



Broker Qualifications

Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below. A passed exam or exam waiver does not permit a broker to do business without an active SRO or state registration.

This individual has passed 1 principal/supervisory exam, 2 general industry/product exams, and 1 state securities law exam.

Principal/Supervisory Exams

Exam	Category	Date
B General Securities Principal Examination	Series 24	05/12/1993

General Industry/Product Exams

Exam	Category	Date
B Securities Industry Essentials Examination	SIE	10/01/2018
B General Securities Representative Examination	Series 7	02/18/1984

State Securities Law Exams

Exam	Category	Date
B Uniform Securities Agent State Law Examination	Series 63	04/13/1993

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at www.finra.org/brokerqualifications/registeredrep/.

Broker Qualifications



Professional Designations

This section details that the representative has reported **0** professional designation(s).

No information reported.



Registration and Employment History

Registration History

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
B 07/1993 - 04/1994	TALLWOOD ASSOCIATES, INC.	26527	
B 05/1991 - 06/1993	WINTHROP SECURITIES CO., INC.	6925	BOSTON, MA
B 11/1987 - 09/1989	RELATED EQUITIES CORPORATION	11218	
B 02/1984 - 06/1987	WINTHROP SECURITIES CO., INC.	6925	

Employment History

This section provides up to 10 years of an individual broker's employment history as reported by the individual broker on the most recently filed Form U4.

Please note that the broker is required to provide this information only while registered with FINRA or a national securities exchange and the information is not updated via Form U4 after the broker ceases to be registered. Therefore, an employment end date of "Present" may not reflect the broker's current employment status.

Employment	Employer Name	Position	Investment Related	Employer Location
05/1993 - Present	BROOKWOOD SECURITIES PARTNERS, LLC	Chairman, Chief Executive Officer and CEO	Y	BEVERLY, MA, United States

Other Business Activities

This section includes information, if any, as provided by the broker regarding other business activities the broker is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious or fraternal and is recognized as tax exempt.

Effective May 1993: President and Director of Brookwood Financial Co., Inc which is the managing member of Brookwood Financial Partners, LLC ("Brookwood"), which is the parent of Brookwood Securities Partners, LLC ("Brookwood Securities"), Brookwood Advisors, LLC (January 2014), Brookwood Management Partners, LLC (May 1993) and Brookwood Financial Limited (January 2024). Mr. Trkla is also the Chairman and Chief Executive Officer of Brookwood and Chairman, Chief Executive Officer and President of Brookwood Securities, Brookwood Management Partners, LLC and Brookwood Advisors, LLC. Mr. Trkla is the sole director of Brookwood Financial Limited. Since employment with Brookwood Financial Partners, LLC: Chairman of the Investment and Executive Committee of Brookwood. I also am manager in the following investment related vehicles. All these businesses are investment related and all are located in Beverly, MA. Mr. Trkla spends equal time in these capacities and in those listed below for BW Gas.

MANAGER OF BROOKWOOD MELBOURNE CO., LLC (OCTOBER 2023)
MANAGER OF BROOKWOOD TEN CABOT, LLC (SEPTEMBER 2021)



Registration and Employment History

Other Business Activities, continued

MANAGER OF BROOKWOOD TEN CABOT, LLC (SEPTEMBER 2021)
 MANAGER OF BROOKWOOD SABRE 5901, LLC (SEPTEMBER 2021)
 MANAGER OF BROOKWOOD SABRE 5901, LLC (SEPTEMBER 2021)
 MANAGER OF BW GAS & CONVENIENCE FUND II GP, LLC (MAY 2019)
 MANAGER OF BROOKWOOD PROPERTIES GP, LLC (JUNE 2018)
 MANAGER OF BROOKWOOD PROPERTIES SUBSIDIARY, LLC (MAY 2019)
 MANAGER OF BROOKWOOD PROPERTIES HOLDINGS, LLC (APRIL 2018)
 MANAGER OF BROOKWOOD LAKESIDE PLANTATION (APRIL 2019)
 MANAGER OF BROOKWOOD COMMERCIAL PLACE (APRIL 2019)
 MANAGER OF BROOKWOOD SYLVAN, LLC (SEPTEMBER 2019)
 MANAGER OF BROOKWOOD SFL CO., LLC (JULY 2017),
 MANAGER OF BROOKWOOD MACARTHUR CO., LLC, (March 2016)
 MANAGER OF BW GAS & CONVENIENCE FUND GP, LLC (JULY 2015)
 MANAGER OF BW GAS & CONVENIENCE FUND III GP, LLC (JULY 2022)
 MANAGER OF BROOKWOOD PACIFIC OFFICE CO., LLC (MAY 2015)
 MANAGER OF BROOKWOOD PHILADELPHIA CO., LLC (MAY 2015)
 MANAGER OF BROOKWOOD PHILADELPHIA I, LLC (MAY 2015)
 MANAGER OF BROOKWOOD PHILADELPHIA HOLDINGS I, LLC (MAY 2015)
 MANAGER OF BROOKWOOD PHILADELPHIA II, LLC (MAY 2015)
 MANAGER OF BROOKWOOD PHILADELPHIA HOLDINGS II, LLC (MAY 2015)
 MANAGER OF MANAGER OF BROOKWOOD CB, CO., INC. (JANUARY 5, 2015)
 MANAGER OF BROOKWOOD TEXAS CO., LLC (MAY 2013)
 MANAGER OF BROOKWOOD YAMATO CO., LLC (SEPTEMBER 2012)
 MANAGER OF BROOKWOOD CROSSROADS CO., LLC (AUGUST 2011)
 MANAGER OF BROOKWOOD MAITLAND CO., LLC (JUNE 2011)
 MANAGER OF BROOKWOOD U.S. REAL ESTATE FUND, G.P., LLC (MARCH 2011)
 MANAGER OF BROOKWOOD REAL ESTATE CO. II, LLC (FEBRUARY 2007)

April 4, 2022. Chairman, Chief Executive Officer and President of BW Gas & Convenience Holdings, LLC ("BW Gas"), currently majority owned by investment vehicles associated with Brookwood Securities. This is located in Beverly, MA and is non-investment related. Mr. Trkla spends a substantial amount of time in this capacity and is compensated. Member of the Executive Committee and the Investment Committees for BW Gas. These are located in Beverly, MA, are investment related, and are part of his time as an officer of BW Gas.

Effective January 2020: Member of the Business Operations Committee for Unity Capital, a family office in Greenville South Carolina. My role is to advise on the performance of operating companies owned by Unity; it is not investment related. I will be compensated \$4,000 for each of the four meetings a year. Only one meeting is in person. Effective January 6, 2022: Member of the Compensation Committee for Unity Capital.

Disclosure Events



What you should know about reported disclosure events:

1. All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.
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 broker is required to disclose a particular criminal event.
 - A customer dispute must involve allegations that a broker engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.
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3. **Disclosure events in BrokerCheck reports come from different sources:**
 - As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, brokerage firms and regulators. When more than one of these sources reports information for the same disclosure event, all 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.
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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 brokers and brokerage 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.

For your convenience, below is a matrix of the number and status of disclosure events involving this broker. Further information regarding these events can be found in the subsequent pages of this report. You also may wish to contact the broker to obtain further information regarding these events.

	Pending	Final	On Appeal
Regulatory Event	0	2	0



Disclosure Event Details

When evaluating this information, please keep in mind that a disclosure event may be pending or involve allegations that are contested and have not been resolved or proven. The matter may, in the end, be withdrawn, dismissed, resolved in favor of the broker, or concluded through a negotiated settlement for certain business reasons (e.g., to maintain customer relationships or to limit the litigation costs associated with disputing the allegations) with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to CRD and therefore some of the specific data fields contained in the report may be blank if the information was not provided to CRD.

Regulatory - Final

This type of disclosure event may involve (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory such as the Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of a broker's authority to act as an attorney, accountant, or federal contractor.

Disclosure 1 of 2

Reporting Source:	Regulator
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	Other: N/A
Date Initiated:	09/30/2009
Docket/Case Number:	2008011708601
Employing firm when activity occurred which led to the regulatory action:	BROOKWOOD SECURITIES PARTNERS, L.P.
Product Type:	No Product
Allegations:	NASD RULES 2110, 3010 - A MEMBER FIRM, ACTING THROUGH THOMAS NICHOLAS TRKLA, FAILED TO ESTABLISH, MAINTAIN AND ENFORCE A REASONABLY DESIGNED SUPERVISORY SYSTEM AND WRITTEN PROCEDURES WITH RESPECT TO REGISTRATION OF PERSONNEL ENGAGED IN THE SECURITIES BUSINESS. THE FIRM'S SUPERVISORY PROCEDURES DID NOT PROVIDE FOR REASONABLE FOLLOW UP AND REVIEW BY FIRM COMPLIANCE OR REGISTRATION PERSONNEL AS TO THE STATUS OF FORM U4S FILED WITH WEB CRD. AS A RESULT, THE FIRM FAILED TO MONITOR THE STATUS OF THE FORM U4 APPLICATION AND ENSURE THAT REGISTRATION HAD BECOME EFFECTIVE FOR EACH OF ITS REPRESENTATIVES. TRKLA WAS RESPONSIBLE FOR HIS MEMBER FIRM'S



SUPERVISORY SYSTEM AND WRITTEN PROCEDURES DURING THIS PERIOD.

Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	09/30/2009
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s)
If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?	No
(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?	



(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or

(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Monetary Sanction 1 of 1

Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$5,000.00
Portion Levied against individual:	\$5,000.00

Payment Plan:



Is Payment Plan Current: No

Date Paid by individual: 10/13/2009

Was any portion of penalty waived? No

Amount Waived:

Regulator Statement WITHOUT ADMITTING OR DENYING THE FINDINGS, TRKLA CONSENTED TO THE DESCRIBED SANCTION AND TO THE ENTRY OF FINDINGS; THEREFORE, HE IS FINED \$5,000.

Reporting Source: Broker

Regulatory Action Initiated By: FINRA

Sanction(s) Sought: Other: N/A

Date Initiated: 09/30/2009

Docket/Case Number: 2008011708601

Employing firm when activity occurred which led to the regulatory action: BROOKWOOD SECURITIES PARTNERS, L.P.

Product Type: No Product

Allegations: FINRA ALLEGED VIOLATIONS OF NASD RULES 2110 AND 3010 DUE TO THE FAILURE TO MONITOR THE STATUS OF FORM U4S TO ENSURE THAT REGISTRATION HAD BECOME EFFECTIVE FOR EACH OF A MEMBER FIRM'S REPRESENTATIVES. FINRA ALLEGED THAT THE FIRM, ACTING THROUGH MR. TRKLA, AS ITS PRINCIPAL, DID NOT ESTABLISH, MAINTAIN AND ENFORCE A REASONABLY DESIGNED SUPERVISORY SYSTEM AND PROCEDURES RELATING TO THE REGISTRATION OF THE FIRM'S PERSONNEL; AND THAT THE FIRM'S PROCEDURES DID NOT PROVIDE FOR REASONABLE FOLLOW UP AND REVIEW BY PERSONNEL TO CONFIRM THE STATUS OF FORM U4S FILED WITH WEBCRD, THE FINRA REGISTRATION SYSTEM.

Current Status: Final

Resolution: Acceptance, Waiver & Consent(AWC)



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

Resolution Date: 09/30/2009

Sanctions Ordered: Civil and Administrative Penalty(ies)/Fine(s)

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$5,000.00

Portion Levied against individual: \$5,000.00

Payment Plan:

Is Payment Plan Current: No

Date Paid by individual: 10/08/2009

Was any portion of penalty waived? No

Amount Waived:

Disclosure 2 of 2

Reporting Source: Regulator

Regulatory Action Initiated By: MICHIGAN

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 12/27/1989

Docket/Case Number:

Employing firm when activity occurred which led to the regulatory action:



Product Type: No Product

Other Product Type(s):

Allegations: FAILED TO PAY THE BALANCE OF THE \$30 1989 RENEWAL FEE, IN THE AMOUNT OF \$15.

Current Status: Final

Resolution: Decision

Resolution Date: 12/27/1989

Sanctions Ordered: Revocation/Expulsion/Denial

Other Sanctions Ordered:

Sanction Details: THOMAS TRKLA'S REGISTRATION WAS REVOKED DUE TO THE FAILURE TO PAY THE BALANCE OF THE \$30 1989 RENEWAL FEE, IN THE AMOUNT OF \$15.

Reporting Source: Broker

Regulatory Action Initiated By: STATE OF MICHIGAN

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 12/27/1989

Docket/Case Number: UNKNOWN

Employing firm when activity occurred which led to the regulatory action:

Product Type: No Product

Other Product Type(s):

Allegations: FAILURE TO PAY A BALANCE DUE OF \$15.00 FOR A SECURITIES LICENSE.

Current Status: Final

Resolution: Decision

Resolution Date: 12/27/1989



Sanctions Ordered:

Revocation/Expulsion/Denial

Other Sanctions Ordered:

Sanction Details:

\$ 15.00 FEE WAS PAID TO THE STATE OF MICHIGAN

Broker Statement

ON MY EARLIER DRP DATED JULY 6, 1993, I
INCORRECTLY INDICATED THAT I WAS ANSWERING ITEM 22E(3). THE
EVENT REPORTED ON THIS AND THE EARLIER DRP CORRECTLY RELATES
TO
ITEM 22E(5).

End of Report



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