FORM ADV

UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION AND REPORT BY EXEMPT REPORTING ADVISERS

	nary Business Name: INVEST FINAN				CRD Number: 1298
	er-Than-Annual Amendment - All Se	ections			Rev. 10/201
5/13	3/2018 1:40:13 PM				
	keep this form updated by	=	ns may result in denial of your application, reversity Form ADV General Instruction 4.	vocation of your registration, or criminal p	rosecution. You must
	n 1 Identifying Information				
			ess, and how we can contact you. If you are fination to assist you with filing an <i>umbrella re</i> g	-	tion in Item 1 should be
A.	Your full legal name (if you are a so IFC HOLDINGS, INC.	ole proprietor, your last, first, and	d middle names):		
B.	(1) Name under which you primaril	-	ss, if different from Item 1.A.		
	List on Section 1.B. of Schedule D	any additional names under wh	ich you conduct your advisory business.		
	(2) If you are using this Form ADV	to register more than one invest	ment adviser under an umbrella registration,	check this box \square	
	If you check this box, complete a S	chedule R for each relying advi	iser.		
C.	If this filing is reporting a change in ☐ your legal name or ☐ your prim		orimary business name (Item 1.B.(1)), enter t	he new name and specify whether the nar	me change is of
D.	(1) If you are registered with the SE(2) If you report to the SEC as an e.(3) If you have one or more Central	xempt reporting adviser, your SI		umbers:	
E.	(1) If you have a number ("CRD Nu	mber") assigned by the FINRA'	s CRD system or by the IARD system, your C	<i>RD</i> number: 12984	
	If your firm does not have a CRD n	umber, skip this Item 1.E. Do no	ot provide the CRD number of one of your off	icers, employees, or affiliates.	
	(2) If you have additional CRD Num	nbers, your additional CRD num			
			No Information Filed		
F.	Principal Office and Place of Busin	ess			
	(1) Address (do not use a P.O. Bo				
	Number and Street 1:		Number and Street 2:		
	12750 CITRUS PARK LANE		SUITE 300		
	City:	State:	Country:	ZIP+4/Postal Code:	
	TAMPA If this address is a private resi	Florida	United States	33625	
	registration, or are registered, whom you are registered. If yo	with one or more state securities u are applying for SEC registrati	principal office and place of business, at which is authorities, you must list all of your offices in ion, if you are registered only with the SEC, on es as of the end of your most recently comple	the state or states to which you are applying if you are reporting to the SEC as an execution	ing for registration or with
	(2) Days of week that you normall Monday - Friday Other:	y conduct business at your <i>princ</i>	cipal office and place of business:		
	Normal business hours at this 8:00 A.M 5:00 P.M. EST	location:			
	(3) Telephone number at this loca 813-880-5302				
	(4) Facsimile number at this location 813-890-6407		···		
	(5) What is the total number of offine recently completed fiscal year	• • •	ffice and place of business, at which you cond	auct investment advisory business as of th	ne ena ot your most

450

G.	Mailing address, if different from your principal office and place of business address:						
	Number and Street 1: P.O. BOX 5097		Number and Street 2:				
	City: APPLETON	State: Wisconsin	Country: United States	ZIP+4/Postal Code: 54912-5097			
	If this address is a private resid	dence, check this box: \Box					
Н.	If you are a sole proprietor, state	e your full residence address,	if different from your principal office and	d place of business address in Item 1.F.:			
	Number and Street 1:		Number and Street 2:				
	City:	State:	Country:	ZIP+4/Postal Code:			
l.	Do you have one or more webs	ites or accounts on publicly a	vailable social media platforms (includin	ng, but not limited to, Twitter, Facebook and LinkedIn)?	Yes ⊙	No O	
	address serves as a portal throu information. You may need to li	ugh which to access other info st more than one portal addre	ormation you have published on the web ss. Do not provide the addresses of we	ailable social media platforms on Section 1.I. of Schedule D. If a wear, you may list the portal without listing addresses for all of the other bsites or accounts on publicly available social media platforms where so the addresses of employee accounts on publicly available social media platforms.	r ere you		
J.	Chief Compliance Officer						
	(1) Provide the name and contact Compliance Officer, if you have	<u>-</u>	-	reporting adviser, you must provide the contact information for your	Chief		
	Name:		Other titles, if any:				
	Telephone number:		Facsimile number, if any	<i>r</i> :			
	Number and Street 1:		Number and Street 2:				
	City:	State:	Country:	ZIP+4/Postal Code:			
	Electronic mail (e-mail) addres	ss, if Chief Compliance Office	r has one:				
K.	Name: IRS Employer Identification Num Additional Regulatory Contact F may provide that information he	Person: If a person other than	the Chief Compliance Officer is authoriz	zed to receive information and respond to questions about this Forr	m ADV, ː	you	
	Name:		Titles:				
	Telephone number:		Facsimile number, if any	v.			
	Number and Street 1:		Number and Street 2:	,			
	City:	State:	Country:	ZIP+4/Postal Code:			
			,·				
	Electronic mail (e-mail) addres	ss, if contact person has one:			Vos	No	
L.	Do you maintain some or all of a principal office and place of bus		e required to keep under Section 204 of	the Advisers Act, or similar state law, somewhere other than your		0	
	If "yes," complete Section 1.L. o	of Schedule D.			Yes	No	
M.	Are you registered with a foreign	n financial regulatory authority	?		0	•	
	Answer "no" if you are not regist complete Section 1.M. of Sched		egulatory authority, even if you have an	affiliate that is registered with a foreign financial regulatory authorit	-		
NI	Are you a public reporting comp	envunder Sections 12 or 15/	d) of the Coourities Evolution Act of 103	42	Yes	No	
IN.	Are you a public reporting comp	rany uniter Sections 12 of 15(d) of the Securities Exchange Act of 193	≒ :	0	⊙	
					Yes	No	
O.	Did you have \$1 billion or more If yes, what is the approximate a		our most recent fiscal year?		0	⊙	
	C \$1 billion to less than \$10	billion					
	C \$10 billion to less than \$5	0 billion					
	S50 billion or more						
	_						

For purposes of Item 1.O. only, "assets" refers to your total assets, rather than the assets you manage on behalf of clients. Determine your total assets using the total assets shown on the balance sheet for your most recent fiscal year end.						
P. Provide your Legal Entity Identifier if you have one:	P. Provide your Legal Entity Identifier if you have one:					
A legal entity identifier is a unique number that companies use to identify each other in the financial marketplace. You may not have a legal entity identifier.						
SECTION 1.B. Other Business Names						
	No Information Filed					
SECTION 1.F. Other Offices						
	ou are applying for SEC registr	=	you conduct investment advisory business. You must conly with the SEC, or if you are an exempt reporting advise	-		
Number and Street 1: 3 LEAR JET LN		Number and Street 2: STE 200				
City: LATHAM	State: New York	Country: United States	ZIP+4/Postal Code: 12110-2314			
If this address is a private residence, check this box:						
Telephone Number: 518-608-1100	Facsimile Number, if any: 518-608-1111					
If this office location is also required to be registered with Branch Office Registration Form (Form BR), please pro 559897			ocation for a broker-dealer or investment adviser on the L	Iniform		
How many <i>employees</i> perform investment advisory fun	actions from this office location	?				
Are other business activities conducted at this office loc	cation? (check all that apply)					
✓ (1) Broker-dealer (registered or unregistered)✓ (2) Bank (including a separately identifiable departm	ent or division of a bank)					
(3) Insurance broker or agent	,					
(4) Commodity pool operator or commodity trading a	advisor (whether registered or	exempt from registration)				
(5) Registered municipal advisor						
☐ (6) Accountant or accounting firm ☐ (7) Lawyer or law firm						
Describe any other investment-related business activiti	es conducted from this office I	location:				
	ou are applying for SEC registr		you conduct investment advisory business. You must construct the SEC, or if you are an exempt reporting advise			
Number and Street 1: 73 MOUNTAINVIEW BLVD		Number and Street 2:				
City:	State:	Country:	ZIP+4/Postal Code:			
BASKING RIDGE	New Jersey	United States	07920-3849			
If this address is a private residence, check this box:						
Telephone Number: 908-860-3505	Facsimile Number, if any: 908-860-3775					

If this office location is also required to be registered with FINRA or a state securities authority as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the CRD Branch Number here: 527801					
How many <i>employees</i> perform investment advisory function 9	ns from this office location	า?			
Are other business activities conducted at this office location	n? (check all that apply)				
☑ (1) Broker-dealer (registered or unregistered)					
☑ (2) Bank (including a separately identifiable department of	or division of a bank)				
☑ (3) Insurance broker or agent					
\square (4) Commodity pool operator or commodity trading advisor	or (whether registered or	exempt from registration	n)		
(5) Registered municipal advisor					
(6) Accountant or accounting firm					
(7) Lawyer or law firm					
Describe any other investment-related business activities co	onducted from this office	location:			
Complete the following information for each office, other than separate Schedule D Section 1.F. for each location. If you are the largest twenty-five offices (in terms of numbers of <i>employani</i>)	re applying for SEC regist	=	-		
Number and Street 1:		Number and Street 2:			
1325 SATELLITE BLVD NW		STE 804			
City:	State:	Country:		ZIP+4/Postal Code:	
SUWANEE	Georgia	United States		30024-4651	
If this address is a private residence, check this box: \Box					
Telephone Number: 770-945-4045	Facsimile Number, if an 678-488-0061	ny:			
If this office location is also required to be registered with FIN Branch Office Registration Form (Form BR), please provide 396356		-	fice location for a	a broker-dealer or investment adviser on the Uniform	
How many <i>employees</i> perform investment advisory function 5	ns from this office location	า?			
Are other business activities conducted at this office location	n? (check all that apply)				
☑ (1) Broker-dealer (registered or unregistered)					
\square (2) Bank (including a separately identifiable department of	or division of a bank)				
☑ (3) Insurance broker or agent					
(4) Commodity pool operator or commodity trading advisor	or (whether registered or	exempt from registration	n)		
(5) Registered municipal advisor					
(6) Accountant or accounting firm					
(7) Lawyer or law firm					
Describe any other investment-related business activities co	onducted from this office	location:			
Complete the following information for each office, other than	n your <i>principal office an</i>	d place of business. at w	hich you conduc	et investment advisory business. You must complete a	
separate Schedule D Section 1.F. for each location. If you are the largest twenty-five offices (in terms of numbers of <i>employed</i>)	re applying for SEC regist	=	-		
Number and Street 1: 2360 BOY SCOUT RD	ı	Number and Street 2:			

Country: United States

ZIP+4/Postal Code:

33763-0900

State:

Florida

City:

CLEARWATER

ii tilis address is a private residence, check tili	S DOX.			
Telephone Number: 800-965-5234	Facsimile Number 727-726-8914	, if any:		
If this office location is also required to be registration Form (Form BR), pt 394917		-	n for a broker-dealer or investment adviser o	n the Uniform
How many <i>employees</i> perform investment adv	visory functions from this office loca	ation?		
Are other business activities conducted at this	office location? (check all that app	ly)		
(1) Broker-dealer (registered or unregistere	d)			
(2) Bank (including a separately identifiable	department or division of a bank)			
☑ (3) Insurance broker or agent				
(4) Commodity pool operator or commodity	trading advisor (whether registere	d or exempt from registration)		
(5) Registered municipal advisor				
(6) Accountant or accounting firm				
(7) Lawyer or law firm				
Describe any other <i>investment-related</i> busines	ss activities conducted from this of	fice location:		
Complete the following information for each of separate Schedule D Section 1.F. for each loc the largest twenty-five offices (in terms of num	ation. If you are applying for SEC re			•
Number and Street 1: 200 CONNECTICUT AVE		Number and Street 2: STE 2		
City:	State:	Country:	ZIP+4/Postal Code:	
NORWALK	Connecticut	United States	06854-1907	
If this address is a private residence, check this	s box:			
Telephone Number: 203-855-1522	Facsimile Number, if an 203-853-1522	ny:		
If this office location is also required to be registranch Office Registration Form (Form BR), p. 171978		-	n for a broker-dealer or investment adviser o	n the Uniform
How many <i>employees</i> perform investment adv	visory functions from this office loca	ation?		
Are other business activities conducted at this ☑ (1) Broker-dealer (registered or unregistere		ly)		
☐ (2) Bank (including a separately identifiable	·			
☑ (3) Insurance broker or agent	,			
(4) Commodity pool operator or commodity	trading advisor (whether registere	d or exempt from registration)		
(5) Registered municipal advisor				
(6) Accountant or accounting firm				
(7) Lawyer or law firm				
Describe any other investment-related business	ss activities conducted from this of	fice location:		
Complete the following information for each of separate Schedule D Section 1.F. for each local			-	

the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1:

2340 N HOLLYWOOD WAY				
City: BURBANK	State: California	Country: United States	ZIP+4/Postal Code: 91505-1124	
If this address is a private residence, check this box: Γ				
Telephone Number: 800-553-3707	Facsimile Number, i 818-565-2290	f any:		
If this office location is also required to be registered wi Branch Office Registration Form (Form BR), please pro 330110		<u>-</u>	e location for a broker-dealer or investment adviser on the Uniform	
How many <i>employees</i> perform investment advisory fur 8	nctions from this office loc	cation?		
Are other business activities conducted at this office loc	cation? (check all that app	ply)		
(1) Broker-dealer (registered or unregistered)				
(2) Bank (including a separately identifiable department	nent or division of a bank)			
✓ (3) Insurance broker or agent✓ (4) Commodity pool operator or commodity trading a	advisor (whether registere	ed or exempt from registration)		
☐ (5) Registered municipal advisor		, ,		
(6) Accountant or accounting firm				
(7) Lawyer or law firm				
Describe any other <i>investment-related</i> business activiti	ies conducted from this o	office location:		
-	ou are applying for SEC i	•	ch you conduct investment advisory business. You must complete a only with the SEC, or if you are an exempt reporting adviser, list only	
Number and Street 1: 5445 CORPORATE DR		Number and Street 2: STE 170		
City:	State:	Country:	ZIP+4/Postal Code:	
TROY	Michigan	United States	48098-2683	
If this address is a private residence, check this box: \Box				
Telephone Number: 248-952-1744	Facsimile Number, i 248-952-1848	if any:		
If this office location is also required to be registered wi Branch Office Registration Form (Form BR), please pro 171507		<u>-</u>	e location for a broker-dealer or investment adviser on the Uniform	
How many <i>employees</i> perform investment advisory fur 6	nctions from this office loc	cation?		
Are other business activities conducted at this office loc	cation? (check all that app	ply)		
(1) Broker-dealer (registered or unregistered)				
(2) Bank (including a separately identifiable departm	nent or division of a bank)			
(3) Insurance broker or agent				
(4) Commodity pool operator or commodity trading a	advisor (whether registere	ed or exempt from registration)		
(5) Registered municipal advisor				
\square (6) Accountant or accounting firm				
(7) Lawyer or law firm				
Describe any other investment-related business activiti	ies conducted from this o	office location:		

separate Schedule D Section 1.F. for each location. If y the largest twenty-five offices (in terms of numbers of each		SEC registration, if you are registered	d only with the SEC, or if you are an exempt reporting adviser, list only			
Number and Street 1:		Number and Street 2:				
4400 WESTOWN PKWY		STE 301				
City:	State:	Country:	ZIP+4/Postal Code:			
WEST DES MOINES	Iowa	United States	50266-6756			
If this address is a private residence, check this box: \Box	1					
Telephone Number:	Facsimile N	umber, if any:				
515-222-4301	515-223-38	42				
If this office location is also required to be registered with Branch Office Registration Form (Form BR), please pro 202169		<u>-</u>	e location for a broker-dealer or investment adviser on the Uniform			
How many <i>employees</i> perform investment advisory fun 6	actions from this offic	ce location?				
Are other business activities conducted at this office loc ✓ (1) Broker-dealer (registered or unregistered)	cation? (check all tha	at apply)				
(2) Bank (including a separately identifiable department or division of a bank)						
☑ (3) Insurance broker or agent						
(4) Commodity pool operator or commodity trading a	advisor (whether reg	istered or exempt from registration)				
(5) Registered municipal advisor						
(6) Accountant or accounting firm						
(7) Lawyer or law firm						
Describe any other investment-related business activiti	es conducted from t	his office location:				
separate Schedule D Section 1.F. for each location. If y	ou are applying for S	•	ich you conduct investment advisory business. You must complete a d only with the SEC, or if you are an exempt reporting adviser, list only			
the largest twenty-five offices (in terms of numbers of e	mployees).					
Number and Street 1: 1818 MARKET ST		Number and Stree STE 2100	et 2:			
City: PHILADELPHIA	State: Pennsylvania	Country: United States	ZIP+4/Postal Code: 19103-3638			
If this address is a private residence, check this box:						
Telephone Number: 215-864-3598	Facsimile Number, 215-925-5089	if any:				
If this office location is also required to be registered with Branch Office Registration Form (Form BR), please pro 355698		<u>-</u>	e location for a broker-dealer or investment adviser on the Uniform			
How many <i>employees</i> perform investment advisory fun 6	actions from this offic	ce location?				
Are other business activities conducted at this office loc ✓ (1) Broker-dealer (registered or unregistered)	cation? (check all tha	at apply)				
lacksquare (2) Bank (including a separately identifiable departm	ent or division of a b	oank)				
☑ (3) Insurance broker or agent						
(4) Commodity pool operator or commodity trading a	dvisor (whether reg	istered or exempt from registration)				
(5) Registered municipal advisor						
(6) Accountant or accounting firm						
(7) Lawyer or law firm						

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each of					
	cation. If you are applying for SEC r		rou conduct investment advisory business. You must complete a y with the SEC, or if you are an exempt reporting adviser, list only		
Number and Street 1: 706 N CLINTON ST		Number and Street 2:			
City:	State:	Country:	ZIP+4/Postal Code:		
SYRACUSE	New York	United States	13204-1327		
If this address is a private residence, check the	his box:				
Telephone Number:	Facsimile Number, if	any:			
315-413-4461	315-478-1502	·			
If this office location is also required to be registered with FINRA or a <i>state securities authority</i> as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the <i>CRD</i> Branch Number here: 634240					
How many <i>employees</i> perform investment ac 6	dvisory functions from this office loc	ation?			
Are other business activities conducted at this	s office location? (check all that app	oly)			
☑ (1) Broker-dealer (registered or unregistered)		•			
🗹 (2) Bank (including a separately identifiable	e department or division of a bank)				
☑ (3) Insurance broker or agent					
(4) Commodity pool operator or commodity	y trading advisor (whether registere	ed or exempt from registration)			
(5) Registered municipal advisor					
(6) Accountant or accounting firm					
(7) Lawyer or law firm					
Describe any other investment-related busine	ess activities conducted from this of	ffice location:			
	cation. If you are applying for SEC r		rou conduct investment advisory business. You must complete a y with the SEC, or if you are an exempt reporting adviser, list only		
Number and Street 1: 615 MEMORIAL BLVD		Number and Street 2:			
City:	State:	Country:	ZIP+4/Postal Code:		
MUDEDEECSOSO	_				
MURFREESBORO	Tennessee	United States	37129-2729		
MURFREESBORO If this address is a private residence, check the	_	United States	37129-2729		
	_		37129-2729		
If this address is a private residence, check the Telephone Number: 615-278-8888	Facsimile Number, if a 615-907-5539	iny: rities authority as a branch office loo	37129-2729 cation for a broker-dealer or investment adviser on the Uniform		
If this address is a private residence, check the Telephone Number: 615-278-8888 If this office location is also required to be reg Branch Office Registration Form (Form BR), p.	Facsimile Number, if a 615-907-5539 gistered with FINRA or a <i>state secur</i> please provide the <i>CRD</i> Branch Nu	ny: rities authority as a branch office loo mber here:			
If this address is a private residence, check the Telephone Number: 615-278-8888 If this office location is also required to be regular Branch Office Registration Form (Form BR), p. 171539 How many <i>employees</i> perform investment acts	Facsimile Number, if a 615-907-5539 gistered with FINRA or a <i>state secur</i> please provide the <i>CRD</i> Branch Nu	iny: rities authority as a branch office loc mber here: ration?			
If this address is a private residence, check the Telephone Number: 615-278-8888 If this office location is also required to be regular Branch Office Registration Form (Form BR), p. 171539 How many <i>employees</i> perform investment acts. Are other business activities conducted at this	Facsimile Number, if a 615-907-5539 gistered with FINRA or a state secur please provide the CRD Branch Nudvisory functions from this office location? (check all that appress of the control of the cont	iny: rities authority as a branch office loc mber here: ration?			
If this address is a private residence, check the Telephone Number: 615-278-8888 If this office location is also required to be reg Branch Office Registration Form (Form BR), p. 171539 How many <i>employees</i> perform investment acts. Are other business activities conducted at this [Image: Conducted at this Image: Conducted acts].	Facsimile Number, if a 615-907-5539 gistered with FINRA or a state secun please provide the CRD Branch Number of the control o	rities authority as a branch office loomber here: eation?			
If this address is a private residence, check the Telephone Number: 615-278-8888 If this office location is also required to be regular Branch Office Registration Form (Form BR), p. 171539 How many employees perform investment acts 5 Are other business activities conducted at this [Image: Conducted at this Image: Con	Facsimile Number, if a 615-907-5539 gistered with FINRA or a state secun please provide the CRD Branch Number of the control o	rities authority as a branch office loomber here: eation?			
If this address is a private residence, check the Telephone Number: 615-278-8888 If this office location is also required to be reg Branch Office Registration Form (Form BR), p. 171539 How many <i>employees</i> perform investment acts. Are other business activities conducted at this [Image: Conducted at this Image: Conducted acts].	Facsimile Number, if a 615-907-5539 gistered with FINRA or a state secur please provide the CRD Branch Nuddvisory functions from this office location? (check all that appreed) e department or division of a bank)	rities authority as a branch office loomber here: ration?			

(6) Accountant or accounting firm					
(7) Lawyer or law firm					
Describe any other <i>investment-related</i> business activities conducted from this office location:					
_	applying for SEC re		ch you conduct investment advisory business. You must complete a donly with the SEC, or if you are an exempt reporting adviser, list only		
Number and Street 1: 214 N MAIN ST		Number and Street 2:			
City: BURLINGTON	State: Iowa	Country: United States	ZIP+4/Postal Code: 52601-5214		
If this address is a private residence, check this box:					
Telephone Number: 319-753-2837	Facsimile Number 319-758-8538	r, if any:			
If this office location is also required to be registered with FIN Branch Office Registration Form (Form BR), please provide the 171732		-	e location for a broker-dealer or investment adviser on the Uniform		
How many <i>employees</i> perform investment advisory functions	from this office loca	ation?			
Are other business activities conducted at this office location? (check all that apply) (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable department or division of a bank) (3) Insurance broker or agent (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (5) Registered municipal advisor (6) Accountant or accounting firm (7) Lawyer or law firm					
_	applying for SEC re		ch you conduct investment advisory business. You must complete a donly with the SEC, or if you are an exempt reporting adviser, list only		
Number and Street 1: 535 BROADHOLLOW RD		Number and Street 2: STE B14			
	tate: ew York	Country: United States	ZIP+4/Postal Code: 11747-3717		
If this address is a private residence, check this box:					
·	acsimile Number, if 31-465-0599	any:			
If this office location is also required to be registered with FIN Branch Office Registration Form (Form BR), please provide the 171975		-	e location for a broker-dealer or investment adviser on the Uniform		
How many <i>employees</i> perform investment advisory functions	from this office loca	ation?			
Are other business activities conducted at this office location? (1) Broker-dealer (registered or unregistered)	? (check all that appl	у)			

(2) bank (including a separately identifiable department	of division of a bank)				
☑ (3) Insurance broker or agent					
(4) Commodity pool operator or commodity trading advis	sor (whether registered	or exempt from registratio	nn)		
(5) Registered municipal advisor					
(6) Accountant or accounting firm					
☐ (7) Lawyer or law firm					
Describe any other investment-related business activities conducted from this office location:					
· · · · · · · · · · · · · · · · · · ·	are applying for SEC reg	•	which you conduct investment advisory business. You must complete a red only with the SEC, or if you are an <i>exempt reporting adviser</i> , list only		
Number and Street 1: 720 E BROADWAY		Number and Street 2:			
City:	State:	Country:	ZIP+4/Postal Code:		
COLUMBIA	Missouri	United States	65201-4444		
If this address is a private residence, check this box: \Box					
Telephone Number:	Facsimile Number, if	any:			
573-874-8446	573-874-8454				
If this office location is also required to be registered with F Branch Office Registration Form (Form BR), please provide 330179		=	ffice location for a broker-dealer or investment adviser on the Uniform		
How many <i>employees</i> perform investment advisory functio 5	ns from this office local	tion?			
Are other business activities conducted at this office location? (check all that apply) (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable department or division of a bank) (3) Insurance broker or agent (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (5) Registered municipal advisor (6) Accountant or accounting firm (7) Lawyer or law firm					
· · · · · · · · · · · · · · · · · · ·	are applying for SEC reg	•	which you conduct investment advisory business. You must complete a red only with the SEC, or if you are an exempt reporting adviser, list only		
Number and Street 1: 205 N 10TH ST		Number and Street 2: STE 520			
City:	State:	Country:	ZIP+4/Postal Code:		
BOISE	Idaho	United States	83702-5795		
If this address is a private residence, check this box: \Box					
Telephone Number: 208-955-7343	Facsimile Number, 208-955-7344	, if any:			
If this office location is also required to be registered with F Branch Office Registration Form (Form BR), please provide 331991 How many <i>employees</i> perform investment advisory function	e the <i>CRD</i> Branch Num	ber here:	ffice location for a broker-dealer or investment adviser on the Uniform		
man, omproposo ponomi invostment advisory function					

Are other business activities conducted at this office location?	? (check all that apply)		
☑ (1) Broker-dealer (registered or unregistered)	(117)		
(2) Bank (including a separately identifiable department or	r division of a hank)		
✓ (3) Insurance broker or agent	arvioloti of a barney		
(4) Commodity pool operator or commodity trading adviso	r (whether registered c	or exempt from registration)	
(5) Registered municipal advisor			
(6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other <i>investment-related</i> business activities con	nducted from this office	e location:	
Complete the following information for each office, other than separate Schedule D Section 1.F. for each location. If you are the largest twenty-five offices (in terms of numbers of <i>employ</i>	e applying for SEC regi		•
Number and Street 1:		Number and Street 2:	
216 WASHINGTON ST			
City: S	State:	Country:	ZIP+4/Postal Code:
WATERTOWN N	lew York	United States	13601-3386
If this address is a private residence, check this box: \Box			
Telephone Number: F	acsimile Number, if an	n.e.	
•	15-788-7956	ry.	
If this office location is also required to be registered with FIN Branch Office Registration Form (Form BR), please provide to 462041 How many employees perform investment advisory functions of the state of the	he CRD Branch Numb s from this office location (check all that apply) r division of a bank) r (whether registered of	on? or exempt from registration)	
Complete the following information for each office, other than separate Schedule D Section 1.F. for each location. If you are the largest twenty-five offices (in terms of numbers of <i>employ</i>	e applying for SEC regi		•
Number and Street 1: 540 NW UNIVERSITY BLVD		Number and Street 2:	
	State	STE 101	7ID (4/Postal Code)
City: PORT SAINT LUCIE	State: Florida	Country: United States	ZIP+4/Postal Code: 34986-2280
If this address is a private residence, check this box:			
Telephone Number:	Facsimile Number, if	any:	
772-340-1200	772-340-5722		

If this office location is also required to be registered with FINRA or a state securities authority as a branch office location for a broker-dealer or investment adviser on the Uniform

Branch Office Registration Form (Form BR), please provide 627819	the CRD Branch Numb	er here:	
How many <i>employees</i> perform investment advisory function 4	ns from this office location	on?	
Are other business activities conducted at this office location	n? (check all that apply)		
☑ (1) Broker-dealer (registered or unregistered)	(* * * * * * * * * * * * * * * * * * *		
☐ (2) Bank (including a separately identifiable department of	or division of a bank)		
☑ (3) Insurance broker or agent	,		
(4) Commodity pool operator or commodity trading advis	or (whether registered o	or exempt from registration)	
(5) Registered municipal advisor	or (midalor regioned e	n oxompt nom rogical autom	
(6) Accountant or accounting firm			
(c) / Research of descenting initial (c) Lawyer or law firm			
_ (',, ', ', ', ', ', ', ', ', ', ', ', ', ',			
Describe any other investment-related business activities c	onducted from this office	e location:	
· · · · · · · · · · · · · · · · · · ·	re applying for SEC regi		ou conduct investment advisory business. You must complete a y with the SEC, or if you are an exempt reporting adviser, list only
Number and Street 1: 533 JOHNSON FERRY RD		Number and Street 2: BLDG C-100	
City:	State:	Country:	ZIP+4/Postal Code:
MARIETTA	Georgia	United States	30068-4655
If this address is a private residence, check this box: $\hfill\Box$			
Telephone Number: 770-971-4142	Facsimile Number, if a 770-971-4122	iny:	
If this office location is also required to be registered with FI Branch Office Registration Form (Form BR), please provide 474213			ation for a broker-dealer or investment adviser on the Uniform
How many <i>employees</i> perform investment advisory function 5	ns from this office location	on?	
Are other business activities conducted at this office location	n? (check all that apply)		
☑ (1) Broker-dealer (registered or unregistered)	(* * * * * * * * * * * * * * * * * * *		
(2) Bank (including a separately identifiable department	or division of a bank)		
(3) Insurance broker or agent			
(4) Commodity pool operator or commodity trading advis	or (whether registered o	or exempt from registration)	
(5) Registered municipal advisor			
(6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other investment-related business activities c	onducted from this office	e location:	
	re applying for SEC regi	•	ou conduct investment advisory business. You must complete a with the SEC, or if you are an exempt reporting adviser, list only
Number and Street 1: 200 E BROWARD BLVD		Number and Street 2: STE 1320	
City:	State:	Country:	ZIP+4/Postal Code:
FORT LAUDERDALE	Florida	United States	33301-1963
If this address is a private residence, check this box:			

Telephone Number: 888-667-4750	Facsimile Number, if a 954-252-3814	any:			
If this office location is also required to be registered with FINRA or a state securities authority as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the CRD Branch Number here: 497197					
How many <i>employees</i> perform investment advisory functions	s from this office locatio	n?			
Are other business activities conducted at this office location? (check all that apply) (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable department or division of a bank) (3) Insurance broker or agent (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (5) Registered municipal advisor (6) Accountant or accounting firm (7) Lawyer or law firm					
Describe any other investment-related business activities con	nducted from this office	e location:			
	e applying for SEC regis	•	ch you conduct investment advisory business. You must complete a only with the SEC, or if you are an exempt reporting adviser, list only		
Number and Street 1: 201 E MAIN ST		Number and Street 2: STE 1			
City:	State: Virginia	Country: United States	ZIP+4/Postal Code: 24091-2501		
If this address is a private residence, check this box: \Box					
-	Facsimile Number, if at 540-745-5740	ny:			
If this office location is also required to be registered with FIN Branch Office Registration Form (Form BR), please provide to 388610			e location for a broker-dealer or investment adviser on the Uniform		
How many <i>employees</i> perform investment advisory functions	s from this office locatio	n?			
Are other business activities conducted at this office location? (check all that apply) (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable department or division of a bank) (3) Insurance broker or agent (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (5) Registered municipal advisor (6) Accountant or accounting firm (7) Lawyer or law firm					
Describe any other <i>investment-related</i> business activities con	nducted from this office	e location:			
	e applying for SEC regis	•	ch you conduct investment advisory business. You must complete a only with the SEC, or if you are an exempt reporting adviser, list only		
Number and Street 1: 753 W RIVER RD	N	lumber and Street 2:			

Country:

State:

ZIP+4/Postal Code:

City:

If this address is a private residence, check this box:			
Telephone Number: 207-877-9450	Facsimile Number, if any 207-877-8876	y:	
If this office location is also required to be registered with F Branch Office Registration Form (Form BR), please provide 553931			a broker-dealer or investment adviser on the Uniform
How many <i>employees</i> perform investment advisory functio	ns from this office location?		
Are other business activities conducted at this office location	on? (check all that apply)		
(1) Broker-dealer (registered or unregistered)			
lacksquare (2) Bank (including a separately identifiable department	or division of a bank)		
☑ (3) Insurance broker or agent			
\square (4) Commodity pool operator or commodity trading advis	sor (whether registered or e	xempt from registration)	
(5) Registered municipal advisor			
(6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other investment-related business activities of	conducted from this office lo	cation:	
Complete the following information for each office, other the separate Schedule D Section 1.F. for each location. If you at the largest twenty-five offices (in terms of numbers of empl	are applying for SEC registra	·	· · · · · · · · · · · · · · · · · · ·
Number and Street 1: 5790 WIDEWATERS PKWY		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
SYRACUSE	New York	United States	13214-1850
If this address is a private residence, check this box:			
Telephone Number:	Facsimile Number, if any:		
315-445-7324	315-445-7347		
If this office location is also required to be registered with F Branch Office Registration Form (Form BR), please provide 462050			a broker-dealer or investment adviser on the Uniform
How many <i>employees</i> perform investment advisory functio	ns from this office location?		
Are other business activities conducted at this office location [IV]	on? (check all that apply)		
(1) Bank (including a separately identifiable department	or division of a hank)		
(2) Insurance broker or agent	2. S		
(3) insurance broker of agent (4) Commodity pool operator or commodity trading advis	sor (whether registered or e	xempt from registration)	
(4) Commodity poor operator or commodity trading advis	55. (Whother registered of ex	nompt from rogiotration)	
(6) Accountant or accounting firm			
(6) Accountant of accounting firm			
	conducted from this office to	cation.	
Describe any other <i>investment-related</i> business activities of	Johanolea Holli triis Office 10	CaliOII.	

Maine

United States

04901-4421

WATERVILLE

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1: 2440 SANDY PLAINS RD		Number and Street 2: BLDG 23	
City:	State:	Country:	ZIP+4/Postal Code:
MARIETTA	Georgia	United States	30066-7232
If this address is a private residence, check this box: \Box			
Telephone Number: 770-565-2125	Facsimile Number, if an 770-565-2127	у:	
If this office location is also required to be registered with Branch Office Registration Form (Form BR), please prov 104910			cation for a broker-dealer or investment adviser on the Uniform
How many <i>employees</i> perform investment advisory fund 4	ctions from this office location	า?	
Are other business activities conducted at this office local	ation? (check all that apply)		
☑ (1) Broker-dealer (registered or unregistered)			
☐ (2) Bank (including a separately identifiable department)	ent or division of a bank)		
✓ (3) Insurance broker or agent	,		
(4) Commodity pool operator or commodity trading ac	dvisor (whather registered or	evennt from registration)	
(5) Registered municipal advisor	avisor (whether registered or	exempt from registration)	
(6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other investment-related business activities	es conducted from this office	location:	
	ou are applying for SEC regist		ou conduct investment advisory business. You must complete a y with the SEC, or if you are an exempt reporting adviser, list only
Number and Street 1: 43A BROOKWOOD AVE		Number and Street 2: STE 6	
- 3	State:	Country:	ZIP+4/Postal Code:
CARLISLE	Pennsylvania	United States	17015-9126
If this address is a private residence, check this box: \Box			
•	Facsimile Number, if any: 717-258-9731		
If this office location is also required to be registered with Branch Office Registration Form (Form BR), please prov 347080			cation for a broker-dealer or investment adviser on the Uniform
How many <i>employees</i> perform investment advisory fund 4	ctions from this office location	า?	
Are other business activities conducted at this office loca ✓ (1) Broker-dealer (registered or unregistered)	ation? (check all that apply)		
☐ (2) Bank (including a separately identifiable department	ent or division of a bank)		
✓ (3) Insurance broker or agent	and a samy		
(4) Commodity pool operator or commodity trading ac	dvisor (whather registered or	exempt from registration)	
	avisor (whether registered or	evembruom redistration)	
(5) Registered municipal advisor			
☐ (6) Accountant or accounting firm ☐ (7) Lawyer or law firm			
(.) Lawyor or law min			
Describe any other <i>investment-related</i> business activitie	es conducted from this office	location:	

	ou are applying for SEC r	-	u conduct investment advisory business. You must complete a with the SEC, or if you are an exempt reporting adviser, list only
Number and Street 1: 205 US HIGHWAY 9		Number and Street 2: STE 8	
City:	State:	Country:	ZIP+4/Postal Code:
FREEHOLD	New Jersey	United States	07728-8561
If this address is a private residence, check this box:			
Telephone Number: 732-409-2644	Facsimile Number, if a 732-409-6731	nny:	
If this office location is also required to be registered wit Branch Office Registration Form (Form BR), please pro 364983		-	tion for a broker-dealer or investment adviser on the Uniform
How many <i>employees</i> perform investment advisory fun	ections from this office loc	eation?	
Are other business activities conducted at this office loc ▼ (1) Broker-dealer (registered or unregistered)	cation? (check all that app	bly)	
(2) Bank (including a separately identifiable departm	ent or division of a bank)		
(4) Commodition and approximation and the tradition of			
□ (4) Commodity pool operator or commodity trading a□ (5) Registered municipal advisor	idvisor (whether registere	ed or exempt from registration)	
(6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other investment-related business activities	es conducted from this of	ffice location:	
SECTION 1.I. Website Addresses			
List your website addresses, including addresses for action Facebook and/or LinkedIn). You must complete a separate			u control the content (including, but not limited to, Twitter, publicly available social media platform.
Address of Website/Account on Publicly Available Socia	al Media Platform: HTTP	2://WWW.INVESTFINANCIAL.COM	
Address of Website/Account on Publicly Available Socia	al Media Platform: HTTP	S://WWW.LINKEDIN.COM/COMPANY	//103357/
Address of Website/Account on Publicly Available Socia	al Media Platform: HTTP	S://WWW.FACEBOOK.COM/INVESTF	FINANCIAL/
SECTION 1.L. Location of Books and Records			
Complete the following information for each location at Schedule D, Section 1.L. for each location.	which you keep your boo	ks and records, other than your <i>princ</i>	ipal office and place of business. You must complete a separate
Name of entity where books and records are kept: ENVESTNET ASSET MANAGEMENT			
Number and Street 1: 35 E WACKER DR		Number and Street 2: 24TH FLOOR	
City:	State:	Country:	ZIP+4/Postal Code:
CHICAGO	Illinois	United States	60601
If this address is a private residence, check this box:			

Telephone Number: 866-924-8912	Facsimile numb	per, if any:		
This is (check one): O one of your branch offices or affiliates.				
$_{\hbox{\scriptsize C}}$ a third-party unaffiliated recordkeeper.				
other.				
Briefly describe the books and records kept at this lot trade Confirmation, Account Statements				
Name of entity where books and records are kept: IRON MOUNTAIN				
Number and Street 1: 121-B KELSEY LANE		Number and Street 2:		
City:	State:	Country:	ZIP+4/Postal Code:	
TAMPA	Florida	United States	33619	
If this address is a private residence, check this box	: 🗖			
Telephone Number: 800-899-4766	Facsimile numb 813-630-9109	per, if any:		
This is (check one): O one of your branch offices or affiliates.				
a third-party unaffiliated recordkeeper.				
O other.				
Briefly describe the books and records kept at this local CERTAIN INVESTMENT ADVISORY RELATED BOOM Name of entity where books and records are kept:		REQUIRED TO BE MAINTAINED ONS	BITE.	
NATIONAL FINANCIAL CORPORATION				
Number and Street 1: WORLD TRADE CENTER		Number and Stree 200 SEAPORT BL		
City:	State:	Country:	ZIP+4/Postal Code:	
BOSTON	Massachusetts	United States	02210	
If this address is a private residence, check this box	: □			
Telephone Number: 800-752-7053	Facsimile number, if a	ny:		
This is (check one): O one of your branch offices or affiliates.				
a third-party unaffiliated recordkeeper.				
other.				
Briefly describe the books and records kept at this local CLEARING FIRM. ENTITY RETAINS COPIES OF AL		APPLICATIONS AND RELATED SU	PPORT AND SERVICING DOCUMENTATION.	
Name of entity where books and records are kept: PERSHING LLC				
Number and Street 1:		Number and Street 2:		

ONE PERSHING PLAZA

•	State:	Country:	ZIP+4/Postal Code:
JERSEY CITY	New Jersey	United States	07399
If this address is a private residence, check this box: \Box			
Telephone Number: 201-413-2000	Facsimile number, if any:		
This is (check one): O one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
other.			
Briefly describe the books and records kept at this location CLEARING FIRM: TRADE CONFIRMATION, ACCOUNT ST.		CES	
Name of entity where books and records are kept: NATIONAL PLANNING CORPORATION			
Number and Street 1:		Number and Street 2:	
100 NORTH SEPULVEDA BLVD		STE 1800	
City: EL SEGUNDO	State: California	Country: United States	ZIP+4/Postal Code: 90245
If this address is a private residence, check this box: $\ \square$			
Telephone Number: (310)899-7900	Facsimile number, if any:		
This is (check one): one of your branch offices or affiliates.			
O a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this location FINANCIAL RECORDS	1.		
Name of entity where books and records are kept: JACKSON NATIONAL LIFE INSURANCE COMPANY			
Number and Street 1: 1 CORPORATE WAY		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
LANSING	Michigan	United States	48951
If this address is a private residence, check this box: $\ \square$			
Telephone Number: (517)381-5500	Facsimile number, if any:		
This is (check one): one of your branch offices or affiliates.			
C a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this location ORGANIZATIONAL DOCUMENTS, CORPORATE MINUTE B		RIALS.	

SECTION	SECTION 1.M. Registration with Foreign Financial Regulatory Authorities					
				No Informati	on Filed	
Item 2	SE	C Re	egistration/Reporting			
					he SEC. Complete this Item 2.A. only if you a tion, the information in Item 2 should be provi	re applying for SEC registration or submitting ded for the <i>filing adviser</i> only.
у	A. To register (or remain registered) with the SEC, you must check at least one of the Items 2.A.(1) through 2.A.(12), below. If you are submitting an <i>annual updating amendment</i> to your SEC registration and you are no longer eligible to register with the SEC, check Item 2.A.(13). Part 1A Instruction 2 provides information to help you determine whether you ma affirmatively respond to each of these items.					
Y	'ou	(the	adviser):			
ſ		(1)	are a large advisory firm that eithe	r:		
			(a) has regulatory assets under ma	anagement of \$100 million (in U.S. dollars)	or more; or	
			(b) has regulatory assets under ma with the SEC;	anagement of \$90 million (in U.S. dollars) or	more at the time of filing its most recent and	nual updating amendment and is registered
ı		(2)	are a mid-sized advisory firm that are either:	has regulatory assets under management o	f \$25 million (in U.S. dollars) or more but les	ss than \$100 million (in U.S. dollars) and you
				s an adviser with the state securities authority	y of the state where you maintain your <i>princip</i>	pal office and place of business or
					e you maintain your <i>principal office and place</i>	·
				•		
		(=)		n wnich an investment adviser, ii registered, v	would not be subject to examination by the s	tate securities authority.
	_	(3)	Reserved			
1		(4)	have your principal office and place	e of business outside the United States;		
1		(5)	are an investment adviser (or sub	adviser) to an investment company registe	red under the Investment Company Act of 19	40;
1		(6)		mpany which has elected to be a business, and you have at least \$25 million of regulat	development company pursuant to section tory assets under management;	54 of the Investment Company Act of 1940
1		(7)	are a pension consultant with resp	ect to assets of plans having an aggregate	value of at least \$200,000,000 that qualifies t	or the exemption in rule 203A-2(a);
1		(8)	are a related adviser under rule 20	3A-2(b) that controls, is controlled by, or is u	under common control with, an investment ac	lviser that is registered with the SEC, and
			your principal office and place of bu	usiness is the same as the registered advise	er;	
			If you check this box, complete Sec	ction 2.A.(8) of Schedule D.		
1		(9)	are an adviser relying on rule 203A	a-2(c) because you expect to be eligible for	SEC registration within 120 days;	
			If you check this box, complete Sec	ction 2.A.(9) of Schedule D.		
ı		(10)	are a multi-state adviser that is red	quired to register in 15 or more states and is	relying on rule 203A-2(d);	
			If you check this box, complete Sec	ction 2.A.(10) of Schedule D.		
1		(11)	are an Internet adviser relying on r			
				pting you from the prohibition against registra	ation with the OFC.	
·		(12)			ation with the SEC;	
_			If you check this box, complete Sec			
	~	(13)	are no longer eligible to remain reg	gistered with the SEC.		
State	Se	curi	ties Authority Notice Filings and Sta	ate Reporting by Exempt Reporting Advise	rs	
					authorities a copy of the Form ADV and any	amendments they file with the SEC. These
			_		e state securities authorities with a copy of re	
					u would like to receive notice of this and all s s), check the box(es) next to the state(s) that	
			-			es from going to state(s) that currently receive
t	hen	n, un	check the box(es) next to those state	e(s).		
ſ			etions			
		AL		☑ L	₩ NE	✓ sc
		AK		☑ IN ☑ A	☑ NV	☑ SD
		AZ AR		✓ KS	☑ NH ☑ NJ	☑ TN ☑ TX
		CA		☑ KY	₩ NM	☑ UT
		CA		☑ kY ☑ LA	✓ NY	☑ VT
		СТ		☑ ME	✓ NC	☑ VI
		DE		☑ MD	☑ ND	☑ VA
			-			

	II.				
☑ FL	⊠ MI	☑ OK	₽ w		
☑ GA	☑ MN	☑ OR	⊠ wi		
□ GU	☑ MS	₽ PA	☑ W		
☑ HI	☑ MO	☑ PR			
☑ ID	☑ MT	☑ RI			
IN ID	MI	₩ RI			
If you are amending your registration to stop report filing fee for the coming year, your an			them and you do not want to pay that state's notic	e filing or	
SECTION 2.A.(8) Related Adviser					
If you are relying on the exemption in rule 203A-2 that is registered with the SEC and your <i>principal</i>			-	ment adviser	
Name of Registered Investment Adviser					
CRD Number of Registered Investment Adviser					
SEC Number of Registered Investment Adviser -					
SECTION 2.A.(9) Investment Adviser Expecting to	o be Eligible for Commission Regi	stration within 120 Days			
If you are relying on rule 203A-2(c), the exemption	n from the prohibition on registration	n available to an adviser that expects	to be eligible for SEC registration within 120 days, u will be deemed to have made the required repre	-	
I am not registered or required to be registere 120 days after the date my registration with the		s authority and I have a reasonable ex	pectation that I will be eligible to register with the	SEC within	
I undertake to withdraw from SEC registration from registering with the SEC.	if, on the 120th day after my registr	ration with the SEC becomes effective	, I would be prohibited by Section 203A(a) of the A	Advisers Act	
SECTION 2.A.(10) Multi-State Adviser					
If you are relying on rule 203A-2(d), the multi-state registration. By checking the appropriate boxes, y	-	_	d to make certain representations about your eligib	oility for SEC	
If you are applying for registration as an investme	ent adviser with the SEC, you must	make both of these representations:			
☐ I have reviewed the applicable state and fede	If you are applying for registration as an investment adviser with the SEC, you must make both of these representations: I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of 15 or more states to register as an investment adviser with the state				
securities authorities in those states. I undertake to withdraw from SEC registration if I file an amendment to this registration indicating that I would be required by the laws of fewer than 15 states to register as an investment advisor with the state securities authorities of those states.					
	n if I file an amendment to this regis				
☐ I undertake to withdraw from SEC registration investment adviser with the state securities at	n if I file an amendment to this regis uthorities of those states.	stration indicating that I would be requ			
I undertake to withdraw from SEC registration investment adviser with the state securities at If you are submitting your annual updating amendating.	n if I file an amendment to this regis uthorities of those states. dment, you must make this represe	stration indicating that I would be requestration:	ired by the laws of fewer than 15 states to register	ras an	
☐ I undertake to withdraw from SEC registration investment adviser with the state securities at	n if I file an amendment to this regis uthorities of those states. dment, you must make this represe mendment, I have reviewed the app	stration indicating that I would be requent entation: plicable state and federal laws and ha	ired by the laws of fewer than 15 states to register	ras an	
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Limited Liability Partnership (LLP)

	0	Limited Liability Company (LLC)	
	0	Limited Partnership (LP)	
	0	Other (specify):	
	If yo	ou are changing your response to this Item, see Part 1A Instruction 4.	
B.		hat month does your fiscal year end each year? CEMBER	
C.	Und	er the laws of what state or country are you organized?	
	Sta	ate Country	
	Del	laware United States	
	-	ou are a partnership, provide the name of the state or country under whose laws your partnership was formed. If you are a sole proprietor, provide the name of the state or ntry where you reside.	
	If yo	ou are changing your response to this Item, see Part 1A Instruction 4.	
Iter	n 4 Su	uccessions	NI.
A.		Yes you, at the time of this filing, succeeding to the business of a registered investment adviser, including, for example, a change of your structure or legal status (e.g., or of organization or state of incorporation)?	⊙
	If "ye	es", complete Item 4.B. and Section 4 of Schedule D.	
B.	Date	e of Succession: (MM/DD/YYYY)	
	If yo	ou have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, check "No." See Part 1A Instruction 4.	
SEC	CTION	1 4 Successions	
SEC	CTION	I 4 Successions No Information Filed	
SEC	CTION		
Iten	n 5 Inf o	No Information Filed	
Iten Re Ins	n 5 Inf o	No Information Filed formation About Your Advisory Business - Employees, Clients, and Compensation les to this Item help us understand your business, assist us in preparing for on-site examinations, and provide us with data we use when making regulatory policy. Part 1A on 5.a. provides additional guidance to newly formed advisers for completing this Item 5.	
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Item Re Ins En If y tha	n 5 Info spons tructio nploye you are an one	No Information Filed Formation About Your Advisory Business - Employees, Clients, and Compensation Les to this Item help us understand your business, assist us in preparing for on-site examinations, and provide us with data we use when making regulatory policy. Part 1A on 5.a. provides additional guidance to newly formed advisers for completing this Item 5. Les ees Le organized as a sole proprietorship, include yourself as an employee in your responses to Item 5.A. and Items 5.B.(1), (2), (3), (4), and (5). If an employee performs more a function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (5).	
Item Re Ins En If y tha	n 5 Info spons truction nploye you are an one Appl 20	No Information Filed formation About Your Advisory Business - Employees, Clients, and Compensation test to this Item help us understand your business, assist us in preparing for on-site examinations, and provide us with data we use when making regulatory policy. Part 1A on 5.a. provides additional guidance to newly formed advisers for completing this Item 5. The provides additional guidance to newly formed advisers for completing this Item 5. The provides additional guidance to newly formed advisers for completing this Item 5. The provides additional guidance to newly formed advisers for completing this Item 5. The provides additional guidance to newly formed advisers for completing this Item 5. The provides additional guidance to newly formed advisers for completing this Item 5. The provides additional guidance to newly formed advisers for completing this Item 5. The provides additional guidance to newly formed advisers for completing this Item 5. The provides additional guidance to newly formed advisers for completing this Item 5. The provides additional guidance to newly formed advisers for completing this Item 5. The provides additional guidance to newly formed advisers for completing this Item 5. The provides additional guidance to newly formed advisers for completing this Item 5. The provides additional guidance to newly formed advisers for completing this Item 5. The provides additional guidance to newly formed advisers for on-site examinations, and provide us with data we use when making regulatory policy. The provides additional guidance to newly formed advisers for on-site examinations, and provide us with data we use when making regulatory policy. The provides additional guidance to newly formed advisers for on-site examinations, and provide us with data we use when making regulatory policy. The provides additional guidance to newly formed advisers for on-site examinations, and provide us with data we use when making regulatory policy. The provides additional guidance to newly poli	
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Item Re Ins En If y tha	n 5 Info spons truction nploye you are an one Appl 20 (1)	romation About Your Advisory Business - Employees, Clients, and Compensation les to this Item help us understand your business, assist us in preparing for on-site examinations, and provide us with data we use when making regulatory policy. Part 1A in 5.a. provides additional guidance to newly formed advisers for completing this Item 5. less le organized as a sole proprietorship, include yourself as an employee in your responses to Item 5.A. and Items 5.B.(1), (2), (3), (4), and (5). If an employee performs more function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (5). Toximately how many employees do you have? Include full- and part-time employees but do not include any clerical workers. Approximately how many of the employees reported in 5.A. perform investment advisory functions (including research)? Approximately how many of the employees reported in 5.A. are registered representatives of a broker-dealer? 20 Approximately how many of the employees reported in 5.A. are registered with one or more state securities authorities as investment adviser representatives? 20 Approximately how many of the employees reported in 5.A. are registered with one or more state securities authorities as investment adviser representatives for an investment adviser other than you?	
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C Partnership

In your response to Item 5.B.(6), do not count any of your employees and count a firm only once – do not count each of the firm's employees that solicit on your behalf.

Clients

In your responses to Items 5.C. and 5.D. do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.

C. (1) To approximately how many clients for whom you do not have regulatory assets under management did you provide investment advisory services during your most recently completed fiscal year?

17708

(2) Approximately what percentage of your clients are non-United States persons?

0%

D. For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships.

The category "business development companies" consists of companies that have made an election pursuant to section 54 of the Investment Company Act of 1940. Unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, do not answer (d)(1) or (d)(3) below.

Indicate the approximate number of your clients and amount of your total regulatory assets under management (reported in Item 5.F. below) attributable to each of the following type of client. If you have fewer than 5 clients in a particular category (other than (d), (e), and (f)) you may check Item 5.D.(2) rather than respond to Item 5.D.(1).

The aggregate amount of regulatory assets under management reported in Item 5.D.(3) should equal the total amount of regulatory assets under management reported in Item 5.F.(2)(c) below.

If a client fits into more than one category, select one category that most accurately represents the client to avoid double counting clients and assets. If you advise a registered investment company, business development company, or pooled investment vehicle, report those assets in categories (d), (e), and (f) as applicable.

Type of Client	(1) Number of Client(s)	(2) Fewer than 5 Clients	(3) Amount of Regulatory Assets under Management
(a) Individuals (other than high net worth individuals)	0		\$ 0
(b) High net worth individuals	0		\$ O
(c) Banking or thrift institutions	0		\$ 0
(d) Investment companies	0		\$ 0
(e) Business development companies	0		\$ 0
(f) Pooled investment vehicles (other than investment companies and business development companies)	0		\$ 0
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	0		\$ 0
(h) Charitable organizations	0		\$ 0
(i) State or municipal government entities (including government pension plans)	0		\$ O
(j) Other investment advisers	0		\$ 0
(k) Insurance companies	0		\$ 0
(I) Sovereign wealth funds and foreign official institutions	0		\$ 0
(m) Corporations or other businesses not listed above	0		\$ 0
(n) Other:	0		\$ 0

Compensation Arrangements

E.	You are compensated for	your investment advisory	services by ((check all that apply):
----	-------------------------	--------------------------	---------------	-------------------------

- (1) A percentage of assets under your management
- (2) Hourly charges
- (3) Subscription fees (for a newsletter or periodical)
- (4) Fixed fees (other than subscription fees)
- (5) Commissions
- **(6)** Performance-based fees
- (7) Other (specify): NO LONGER PROVIDING INVESTMENT ADVISORY SERVICES

Item 5 Information About Your Advisory Business - Regulatory Assets Under Management

Regulatory Assets Under Management

Yes No

F. (1) Do you provide continuous and regular supervisory or management services to securities portfolios?

0	•

(2) If yes, what is the amount of your regulatory assets under management and total number of accounts?

	Non-Discretionary:	(b)	\$	(e)	
	Total:	(c)	\$	(f)	
	Part 1A Instruction 5.b. explains how to calculate	te your r	egulatory ass	ets under management. You must follow these instructions carefully when completing this Iter	n.
((3) What is the approximate amount of your total recepersons?	gulatory	assets under	management (reported in Item 5.F.(2)(c) above) attributable to clients who are non-United Sta	ates
	\$				
	•				
Item 5	Information About Your Advisory Business - Advis	sory Act	ivities		
Advi	sory Activities				
	What type(s) of advisory services do you provide? Cl	heck all t	hat apply.		
	(1) Financial planning services				
	(2) Portfolio management for individuals and(3) Portfolio management for investment cor			s business development companies" that have made an election pursuant to section 54 of the I	Investment
	Company Act of 1940)	пратнез	(as well as	business development companies that have made an election pursuant to section 54 of the f	Tivestillent
	☐ (4) Portfolio management for pooled investm	ent vehi	cles (other th	an investment companies)	
	-	ther than	small busin	esses) or institutional <i>clients</i> (other than registered investment companies and other pooled i	nvestment
	vehicles) (6) Pension consulting services				
	(7) Selection of other advisers (including <i>priv</i>	ate fund	managers)		
	(8) Publication of periodicals or newsletters				
	(9) Security ratings or pricing services				
	(10) Market timing services(11) Educational seminars/workshops				
	(12) Other(specify): NO LONGER PROVIDING	ADVISO	RY SERVICE	S	
	E ducal				
				to an investment advisory contract to an investment company registered under the Investmen ne 811 or 814 number of the investment company or investment companies to which you prov	
Н.	If you provide financial planning services, to how ma	ınv <i>clieni</i>	s did vou pro	vide these services during your last fiscal year?	
	⊙ 0	,			
	- 1 10				
	0 11 - 25				
	26 - 50				
	O 51 - 100				
	O 101 - 250				
	O 251 - 500				
	More than 500				
	If more than 500, how many?				
	(round to the nearest 500)				
	In your responses to this Item 5.H., do not include as	s "clients	" the investo	s in a private fund you advise, unless you have a separate advisory relationship with those inv	estors.
					Yes No
l.	(1) Do you participate in a wrap fee program?				\circ
	(2) If you participate in a wrap fee program, what is the	he amou	nt of your re	gulatory assets under management attributable to acting as:	
	(a) sponsor to a wrap fee program				
	\$ (h) = =================================				
	(b) portfolio manager for a wrap fee program?				
	(c) sponsor to and portfolio manager for the sam	ne <i>wrap</i> i	fee program?		
	\$				
	If you report an amount in Item 5.I.(2)(c), do not repo	ort that a	mount in Iter	n 5.I.(2)(a) or Item 5.I.(2)(b).	
	If you are a portfolio manager for a wrap fee program	n. list the	names of th	e programs, their sponsors and related information in Section 5.I.(2) of Schedule D.	
	, sa are a pernone manager for a wrap fee prograf	,	. riairios Oi (I)	e programo, area openiorio ana relatea imermatieri in decitori e.i.(2) di delletale D.	
	If your involvement in a wrap fee program is limited	to recon	nmending wr	ap fee programs to your clients, or you advise a mutual fund that is offered through a wrap fee	program,
	do not check Item 5.I.(1) or enter any amounts in res	sponse t	o Item 5.I.(2)		
					Yes No
J.	(1) In response to Item 4.B. of Part 2A of Form ADV,	do you ir	ndicate that y	ou provide investment advice only with respect to limited types of investments?	\circ
	(2) Do you report <i>client</i> assets in Item 4.E. of Part 2.F.	A that are	e computed (sing a different method than the method used to compute your regulatory assets under	0 0

Discretionary:

(a) \$

	management?		
K.	Separately Managed Account Clients		
	(1) Do you have regulatory assets under management attributable to <i>clients</i> other than those listed in Item 5.D.(3)(d)-(f) (separately managed account <i>clients</i>)?	Yes C	No ⊙
	If yes, complete Section 5.K.(1) of Schedule D.		
	(2) Do you engage in borrowing transactions on behalf of any of the separately managed account <i>clients</i> that you advise? If yes, complete Section 5.K.(2) of Schedule D.	0	•
	(3) Do you engage in derivative transactions on behalf of any of the separately managed account <i>clients</i> that you advise? If yes, complete Section 5.K.(2) of Schedule D.	0	•
	(4) After subtracting the amounts in Item 5.D.(3)(d)-(f) above from your total regulatory assets under management, does any custodian hold ten percent or more of this remaining amount of regulatory assets under management?	0	•
	If yes, complete Section 5.K.(3) of Schedule D for each custodian.		
SEC	TION 5.G.(3) Advisers to Registered Investment Companies and Business Development Companies		
	No Information Filed		

SECTION 5.K.(1) Separately Managed Accounts

SECTION 5.I.(2) Wrap Fee Programs

After subtracting the amounts reported in Item 5.D.(3)(d)-(f) from your total regulatory assets under management, indicate the approximate percentage of this remaining amount attributable to each of the following categories of assets. If the remaining amount is at least \$10 billion in regulatory assets under management, complete Question (a). If the remaining amount is less than \$10 billion in regulatory assets under management, complete Question (b).

No Information Filed

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

End of year refers to the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. Mid-year is the date six months before the end of year date. Each column should add up to 100% and numbers should be rounded to the nearest percent.

Investments in derivatives, registered investment companies, business development companies, and pooled investment vehicles should be reported in those categories. Do not report those investments based on related or underlying portfolio assets. Cash equivalents include bank deposits, certificates of deposit, bankers' acceptances and similar bank instruments.

Some assets could be classified into more than one category or require discretion about which category applies. You may use your own internal methodologies and the conventions of your service providers in determining how to categorize assets, so long as the methodologies or conventions are consistently applied and consistent with information you report internally and to current and prospective clients. However, you should not double count assets, and your responses must be consistent with any instructions or other guidance relating to this Section.

Α	sset Type	Mid-year	End of year
(i)	i) Exchange-Traded Equity Securities		%
(ii	Non Exchange-Traded Equity Securities	%	%
(ii) U.S. Government/Agency Bonds	%	%
(iv) U.S. State and Local Bonds	%	%
(v	(v) Sovereign Bonds		%
(v) Investment Grade Corporate Bonds	%	%
(v	i) Non-Investment Grade Corporate Bonds	%	%
(v	ii) Derivatives	%	%
(i)) Securities Issued by Registered Investment Companies or Business Development Companies	%	%
(x	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	%	%
(x) Cash and Cash Equivalents	%	%
(x	i) Other	%	%

Generally describe any assets included in "Other"

Ass	et Type	End of year
(i)	Exchange-Traded Equity Securities	%
(ii)	Non Exchange-Traded Equity Securities	%
(iii)	U.S. Government/Agency Bonds	%
(iv)	U.S. State and Local Bonds	%
(v)	Sovereign Bonds	%
(vi)	Investment Grade Corporate Bonds	%
(vii)	Non-Investment Grade Corporate Bonds	%
(viii)	Derivatives	%
(ix)	Securities Issued by Registered Investment Companies or Business Development Companies	%
(x)	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	%
(xi)	Cash and Cash Equivalents	%
(xii)	Other	%

Generally describe any assets included in "Other"

SECTION 5.K.(2) Separately Managed Accounts - Use of Borrowingsand Derivatives

☑ No information is required to be reported in this Section 5.K.(2) per the instructions of this Section 5.K.(2)

If your regulatory assets under management attributable to separately managed accounts are at least \$10 billion, you should complete Question (a). If your regulatory assets under management attributable to separately managed accounts are at least \$500 million but less than \$10 billion, you should complete Question (b).

(a) In the table below, provide the following information regarding the separately managed accounts you advise. If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise. End of year refers to the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. Mid-year is the date six months before the end of year date.

In column 1, indicate the regulatory assets under management attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any *borrowings* and (b) the *gross notional* value of all derivatives, by (ii) the regulatory assets under management of the account.

In column 2, provide the dollar amount of *borrowings* for the accounts included in column 1.

In column 3, provide aggregate *gross notional value* of derivatives divided by the aggregate regulatory assets under management of the accounts included in column 1 with respect to each category of derivatives specified in 3(a) through (f).

You may, but are not required to, complete the table with respect to any separately managed account with regulatory assets under management of less than \$10,000,000.

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

(i) Mid-Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings		(3)	Derivative Exp	osures		
			(a) Interest Rate Derivative	(b) Foreign Exchange Derivative	(c) Credit Derivative	(d) Equity Derivative	(e) Commodity Derivative	(f) Other Derivative
Less than 10%	\$	\$	%	%	%	%	%	%
10-149%	\$	\$	%	%	%	%	%	%
150% or more	\$	\$	%	%	%	%	%	%

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

(ii) End of Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings		(3)	Derivative Exp	osures		
			(a) Interest Rate Derivative	(b) Foreign Exchange Derivative	(c) Credit Derivative	(d) Equity Derivative	(e) Commodity Derivative	(f) Other Derivative
Less than 10%	\$	\$	%	%	%	%	%	%

10-149%	\$ \$	%	%	%	%	%	%
150% or more	\$ \$	%	%	%	%	%	%

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

(b) In the table below, provide the following information regarding the separately managed accounts you advise as of the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

In column 1, indicate the regulatory assets under management attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any *borrowings* and (b) the *gross notional* value of all derivatives, by (ii) the regulatory assets under management of the account.

In column 2, provide the dollar amount of borrowings for the accounts included in column 1.

Item 6 Other Business Activities

(13) lawyer or law firm

(14) other financial product salesperson (specify):

(3) Do you sell products or provide services other than investment advice to your advisory clients?

You may, but are not required to, complete the table with respect to any separately managed accounts with regulatory assets under management of less than \$10,000,000.

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings
Less than 10%	\$	\$
10-149%	\$	\$
150% or more	\$	\$

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

SECTION 5.K.(3) Custodians for Separately Managed Accounts	
	No Information Filed

n th	n this Item, we request information about your firm's other business activities.					
A.	You	are a	ctively engaged in business as a (check all that apply):			
	V	(1)	broker-dealer (registered or unregistered)			
		(2)	registered representative of a broker-dealer			
		(3)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)			
		(4)	futures commission merchant			
		(5)	real estate broker, dealer, or agent			
	V	(6)	insurance broker or agent			
		(7)	bank (including a separately identifiable department or division of a bank)			
		(8)	trust company			
		(9)	registered municipal advisor			
		(10)	registered security-based swap dealer			
		(11)	major security-based swap participant			
		(12)	accountant or accounting firm			

If you engage in other business using a name that is different from the names reported in Items 1.A. or 1.B.(1), complete Section 6.A. of Schedule D.

3.	(1)	Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)?
	(2)	If yes, is this other business your primary business?
		If "ves " describe this other business on Section 6.B.(2) of Schedule D. and if you engage in this business under a different name, provide that name

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Yes No

If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide that name.

If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide that name.

SECTION 6.A. Names of Your Other Businesses
No Information Filed
SECTION 6.B.(2) Description of Primary Business
Describe your primary business (not your investment advisory business):
If you engage in that business under a different name, provide that name:
SECTION 6.B.(3) Description of Other Products and Services
Describe other products or services you sell to your <i>client</i> . You may omit products and services that you listed in Section 6.B.(2) above.
If you engage in that business under a different name, provide that name:
Item 7 Financial Industry Affiliations
In this Item, we request information about your financial industry affiliations and activities. This information identifies areas in which conflicts of interest may occur between you and your <i>clients</i> .
A. This part of Item 7 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates. Your <i>related persons</i> are all of your <i>advisory affiliates</i> and any <i>person</i> that is under common <i>control</i> with you.
You have a related person that is a (check all that apply):
 (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered) (2) other investment adviser (including financial planners)
(2) Other investment adviser (including infancial planners) (3) registered municipal advisor
(4) registered security-based swap dealer
 □ (5) major security-based swap participant ☑ (6) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
(7) futures commission merchant
✓ (8) banking or thrift institution✓ (9) trust company
(10) accountant or accounting firm
(11) lawyer or law firm
 (12) insurance company or agency (13) pension consultant
(14) real estate broker or dealer
 (15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles
(16) Sponsor, general partner, managing member (or equivalent) or pooled investment vertices
Note that Item 7.A. should not be used to disclose that some of your employees perform investment advisory functions or are registered representatives of a broker-dealer. The number of your firm's employees who perform investment advisory functions should be disclosed under Item 5.B.(1). The number of your firm's employees who are registered representatives of a broker-dealer should be disclosed under Item 5.B.(2).
Note that if you are filing an umbrella registration, you should not check Item 7.A.(2) with respect to your relying advisers, and you do not have to complete Section 7.A. in Schedule D for your relying advisers. You should complete a Schedule R for each relying adviser.
For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete Section 7.A. of Schedule D.
You do not need to complete Section 7.A. of Schedule D for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.
You must complete Section 7.A. of Schedule D for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.
SECTION 7.A. Financial Industry Affiliations
Complete a separate Schedule D Section 7.A. for each <i>related person</i> listed in Item 7.A.
1. Legal Name of Related Person: FIRST DAKOTA, INC.
2. Primary Business Name of <i>Related Person</i> : FIRST DAKOTA, INC.

3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or		
	Other		
4.	Related Person's (a) CRD Number (if any):		
	(a) CRD Number (if any):		
	(b) CIK Number(s) (if any):		
	No Information Filed		
5.	Related Person is: (check all that apply) (a)		
	 (h) □ banking or thrift institution (i) □ trust company (j) □ accountant or accounting firm (k) □ lawyer or law firm 		
	(I) insurance company or agency		
	(m) pension consultant		
	 (n) real estate broker or dealer (o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles 		
	(p) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
		Yes	No
6.	Do you control or are you controlled by the related person?	\odot	0
7	Are you and the related narran under common central?		
/.	Are you and the related person under common control?	⊙	0
8.	(a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	0
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not	Ö	
	operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	~	~
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:		
	Number and Street 1: Number and Street 2:		
	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:		
		Yes	No
9.	(a) If the related person is an investment adviser, is it exempt from registration?	0	•
	(b) If the answer is yes, under what exemption?		
10.	(a) Is the related person registered with a foreign financial regulatory authority?	\circ	\odot
	(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed		
11.	Do you and the related person share any supervised persons?	_	_
		⊙	0
12.	Do you and the <i>related person</i> share the same physical location?	0	•
1.	Legal Name of Related Person: JACKSON NATIONAL LIFE INSURANCE COMPANY		
2.	Primary Business Name of <i>Related Person</i> : JACKSON NATIONAL LIFE INSURANCE COMPANY		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Other		
4.	Related Person's		

	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	(a) (b) (c) (d)	ated Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant		
	(n) (o)	 □ banking or thrift institution □ trust company □ accountant or accounting firm □ lawyer or law firm □ insurance company or agency □ pension consultant □ real estate broker or dealer □ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles □ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles 		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment venicles	Yes	N
6.	Do y	you control or are you controlled by the related person?	0	6
7.	Are :	you and the related person under common control?	•	c
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	,
		If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>custody</i> of your <i>clients</i> ' assets: Number and Street 1: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:		
_			Yes	
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	0	C
	(b)	If the answer is yes, under what exemption?		
10.		Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed	0	•
11.	Do y	ou and the related person share any supervised persons?	•	_
		you and the <i>related person</i> share the same physical location?	0	
				_
1.	_	al Name of <i>Related Person</i> : KSON NATIONAL ASSET MANAGEMENT, LLC		
2.		nary Business Name of <i>Related Person</i> : KSON NATIONAL ASSET MANAGEMENT, LLC		
3.		ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 58171		
	Othe)T		
4.		ated Person's CRD Number (if any): 111079		
	(b)	CIK Number(s) (if any):		
		No Information Filed		

		ated Person is: (check all that apply)		
	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	trust company		
	(j)	accountant or accounting firm		
	(k)	lawyer or law firm		
	(l)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
•	_		Yes	No
6.	Do y	you control or are you controlled by the related person?	\circ	⊙
7.	Are	you and the related person under common control?	⊙	\circ
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	\odot
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not	0	0
		operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds	_	_
		or securities that are maintained at the related person?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:		
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: □	V	NI-
0	(0)	If the related person is an investment advisor, is it exempt from registration?	Yes	
9.		If the related person is an investment adviser, is it exempt from registration?	0	⊙
	(b)	If the answer is yes, under what exemption?		
	(-)			
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•
10.	(a)	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.	0	•
	(a) (b)	Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed	0	•
	(a) (b)	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.		• •
11.	(a) (b)	Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed you and the <i>related person</i> share any <i>supervised persons</i> ?		
11.	(a) (b)	Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed	•	
11.	(a) (b)	Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed you and the <i>related person</i> share any <i>supervised persons</i> ?	•	0
11.	(a) (b)	Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed you and the <i>related person</i> share any <i>supervised persons</i> ?	•	0
11.	(a) (b) Do y	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location?	•	0
11.	(a) (b) Do y Do y	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person:	•	0
11.	(a) (b) Do y Do y	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location?	•	0
11.	(a) (b) Do y Do y Lega JAC	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC	•	0
11.	(a) (b) Do y Do y Lega JAC	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person:	•	0
11.	(a) (b) Do y Do y Lega JAC	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: IKSON NATIONAL LIFE DISTRIBUTORS LLC hary Business Name of Related Person:	•	0
11.	(a) (b) Do y Do y Lega JAC Prim JAC	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: IKSON NATIONAL LIFE DISTRIBUTORS LLC hary Business Name of Related Person:	•	0
11.	(a) (b) Do y Do y Lega JAC Prim JAC	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: IKSON NATIONAL LIFE DISTRIBUTORS LLC hary Business Name of Related Person: IKSON NATIONAL LIFE DISTRIBUTORS LLC	•	0
11.	(a) (b) Do y Do y Lega JAC Prim JAC	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC hary Business Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC ared Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	•	0
11.	(a) (b) Do y Do y Lega JAC Prim JAC Rela 8 - 4	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: IKSON NATIONAL LIFE DISTRIBUTORS LLC hary Business Name of Related Person: IKSON NATIONAL LIFE DISTRIBUTORS LLC ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 18884	•	0
11.	(a) (b) Do y Do y Lega JAC Prim JAC Rela 8 - 4 or	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: IKSON NATIONAL LIFE DISTRIBUTORS LLC hary Business Name of Related Person: IKSON NATIONAL LIFE DISTRIBUTORS LLC ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 18884	•	0
11.	(a) (b) Do y Do y Lega JAC Prim JAC Rela 8 - 4 or Other	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: IKSON NATIONAL LIFE DISTRIBUTORS LLC hary Business Name of Related Person: IKSON NATIONAL LIFE DISTRIBUTORS LLC ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 18884	•	0
11. 12. 1. 2.	(a) (b) Do y Do y Lega JAC Prim JAC Rela 8 - 4 or Other	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC hary Business Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) lased Person's CRD Number (if any):	•	0
11.	(a) (b) Do y Do y Lega JAC Prim JAC Rela 8 - 4 or Other (a)	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed You and the related person share any supervised persons? You and the related person share the same physical location? All Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC Anary Business Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC Sated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 18984 Per Sated Person's CRD Number (if any): 40178	•	0
11.	(a) (b) Do y Do y Lega JAC Prim JAC Rela 8 - 4 or Other (a)	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed You and the related person share any supervised persons? You and the related person share the same physical location? All Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC Harry Business Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC Sated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 18884 Berton CRD Number (if any): 40178 CIK Number(s) (if any):	•	0
11.	(a) (b) Do y Do y Lega JAC Prim JAC Rela 8 - 4 or Other (a)	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed You and the related person share any supervised persons? You and the related person share the same physical location? All Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC Anary Business Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC Sated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 18984 Per Sated Person's CRD Number (if any): 40178	•	0
11.	(a) (b) Do y Do y Lega JAC Prim JAC Rela 8 - 4 or Other (a)	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed You and the related person share any supervised persons? You and the related person share the same physical location? All Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC Harry Business Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC Sated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 18884 Berton CRD Number (if any): 40178 CIK Number(s) (if any):	•	0
11. 12. 1. 3.	(a) (b) Do y Lega JAC Prim JAC Rela 8 - 4 or Other (a) (b)	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed No Information Filed You and the related person share any supervised persons? You and the related person share the same physical location? In Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC Paray Business Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC Interest Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 18984 Interest Person's CRD Number (if any): No Information Filed No Information Filed	•	0
11. 12. 1. 3.	(a) (b) Do y Do y Lega JAC Prim JAC Rela 8 - 4 or Other (a) (b)	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC harry Business Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 18984 are ated Person's CRD Number (if any): 40178 CIK Number(s) (if any): No Information Filed	•	0
11. 12. 1. 3.	(a) (b) Do y Do y Lega JAC Prim JAC Rela (a) (b) Rela (a) (b)	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location? all Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC harry Business Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 18984 ar all All Person's CRD Number (if any): Author (if any): No Information Filed broker-dealer, municipal securities dealer, or government securities broker or dealer	•	0
11. 12. 1. 3.	(a) (b) Do y Lega JAC Prim JAC Rela 8 - 4 or Other (a) (b) Rela (b)	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC harry Business Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 8884 are all Amber (if any): No Information Filed No Information Filed	•	0
11. 12. 1. 3.	(a) (b) Do y Do y Lega JAC Prim JAC Rela (a) (b) Rela (a) (b)	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed	•	0
11. 12. 1. 3.	(a) (b) Do y Do y Lega JAC Prim JAC Rela 8 - 4 or Other (a) (b) Rela (a) (b) (c)	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC harry Business Name of Related Person: KSON NATIONAL LIFE DISTRIBUTORS LLC ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 8884 are all Amber (if any): No Information Filed No Information Filed	•	0

	(f) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g) futures commission merchant		
	(h) banking or thrift institution		
	(i) Tust company		
	(j) accountant or accounting firm		
	(k) awyer or law firm		
	(I) Insurance company or agency		
	(m) pension consultant		
	(n) real estate broker or dealer		
	(o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
		Yes	s No
6.	Do you control or are you controlled by the related person?	0	⊙
7.	Are you and the related person under common control?	⊙	0
8.	(a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	⊙
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not		0
	operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' fund	ds	
	or securities that are maintained at the <i>related person</i> ?		
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>custody</i> of your <i>clients'</i> assets:		
	Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:		
	If this address is a private residence, check this box:		
		Yes	s No
9.	(a) If the related person is an investment adviser, is it exempt from registration?	0	•
	(b) If the answer is yes, under what exemption?		٠
	(b) If the answer is yes, under what exemption:		
10.	. (a) Is the related person registered with a foreign financial regulatory authority?	_	•
	(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.		٠
	No Information Filed		
11.	. Do you and the related person share any supervised persons?	_	•
			٠
12.	. Do you and the <i>related person</i> share the same physical location?	0	•
		~	~
1.	Legal Name of Related Person:		
	INVEST FINANCIAL CORPORATION INSURANCE AGENCY INC OF ILLINOIS		
2	Drimary Business Name of Related Dayson		
۷.	Primary Business Name of <i>Related Person</i> : INVEST FINANCIAL CORPORATION INSURANCE AGENCY INC OF ILLINOIS		
	THE STATE OF A STATE O		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-		
	or		
	Other		
4.	Related Person's		
	(a) CRD Number (if any):		
	(b) CIK Number(s) (if any):		
	(b) CIK Number(s) (if any): No Information Filed		
5.	Related Person is: (check all that apply)		
	(a) D broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b) other investment adviser (including financial planners)		
	(c) registered municipal advisor		
	(d) registered security-based swap dealer		
	(e) amajor security-based swap participant		
	(f) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g) futures commission merchant		
	(h) Deanking or thrift institution		
	(i) trust company		
	(j) ☐ accountant or accounting firm (k) ☐ lawyer or law firm		
	(k) L lawyer or law firm		

	(I)	~	insurance company or agency		
	(m)		pension consultant		
	(n)		real estate broker or dealer		
	(o)		sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)		sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
				Yes	No
6.	Do	you (control or are you controlled by the related person?	\odot	\circ
_					
7.	Are	you	and the related person under common control?	⊙	0
8.	(2)	Do	bes the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	_	_
0.	(a)				⊙
	(b)	ope	rou are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not erationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds securities that are maintained at the <i>related person</i> ?	0	0
	(c)		ou have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:		
	()	-	umber and Street 1: Number and Street 2:		
		Cit	·		
		If t	this address is a private residence, check this box: 🗆		
				Yes	No
9.	(a)	If tr	he <i>related person</i> is an investment adviser, is it exempt from registration?	0	0
	(b)	If th	he answer is yes, under what exemption?		
10	(0)	lo t	the related person registered with a foreign financial regulatory authority?	_	
10.				0	⊙
	(b)	II TI	he answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed		
11.	Do	vou a	and the related person share any supervised persons?	~	0
		,		٠	0
12.	Do	you a	and the related person share the same physical location?	•	0
					_
1.	مم ا	M lei	lame of Related Person:		
١.	_		IAL PLANNING CORPORATION		
2.		-	Business Name of Related Person:		
	NA	ΓΙΟΝ	IAL PLANNING CORPORATION ("NPC OF AMERICA" IN FL & NY)		
•					
3.			<i>l Person'</i> s SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 1015		
	or	71			
	Oth	er			
4.	Rel		l Person's		
	(a)		RD Number (if any):		
	(h)		604 K Number(s) (if any):		
	(b)	Cir	No Information Filed		
5.	Rel		I Person is: (check all that apply)		
	(a)	V	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	V	other investment adviser (including financial planners)		
	(c) (d)		registered municipal advisor registered security-based swap dealer		
	(e)		major security-based swap participant		
	(f)		commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)		futures commission merchant		
	(h)		banking or thrift institution		
	(i)		trust company		
	(j)		accountant or accounting firm		
	(k)		lawyer or law firm		
	(I)	V	insurance company or agency		
	(m)	_	pension consultant		
	(n)	_	real estate broker or dealer		
	(o)		sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(P)		openion, general partner, managing member (or equivalent) or pooled investment venioles		

6.	Do y	ou <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	0	•
7.	Are y	ou and the related person under common control?	•	0
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	0
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	
		If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> assets:		
	(-)	Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box:		
	, ,		Yes	No
9.		If the <i>related person</i> is an investment adviser, is it exempt from registration?	\circ	•
	(b)	If the answer is yes, under what exemption?		
10). (a)	Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	_	
'		If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.	0	•
	(D)	No Information Filed		
11	. Do y	ou and the related person share any supervised persons?	•	0
12	<u>'</u> . Do y	ou and the <i>related person</i> share the same physical location?	\circ	•
1.	Lega	l Name of Related Person:		
	INVE	STMENT CENTERS OF AMERICA, INC.		
2.		ary Business Name of <i>Related Person</i> : STMENT CENTERS OF AMERICA, INC.		
	1140	CHILLIA CLATERO OF AMERICA, INC.		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	801 -	- 56410		
	or Othe	r		
	Otric			
4.	Rela	ted Person's		
		CRD Number (if any):		
		16443 CIV Number(a) (if anyl)		
	(b)	CIK Number(s) (if any): No Information Filed		
5.		ted Person is: (check all that apply)		
	` ,	broker-dealer, municipal securities dealer, or government securities broker or dealer		
		other investment adviser (including financial planners)		
	(-)	registered municipal advisor registered security-based swap dealer		
	` '	major security-based swap participant		
	. ,	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	□ banking or thrift institution		
	(i)	□ trust company		
	(j)	accountant or accounting firm		
	(k)	☐ lawyer or law firm		
	` '	insurance company or agency		
	(m) (n)	pension consultant real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
		sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	ou control or are you controlled by the related person?	\odot	0
7.	Are y	vou and the related person under common control?	⊙	0
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?		
0.	(a)	boos the related person act as a qualified edistediant for your chemic in confidencial with advisory services you provide to chemics!	0	⊙

	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:		
	, ,	Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: □		
			Yes	No
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	0	\odot
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	\odot
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.		
		No Information Filed		
11.	Do y	you and the related person share any supervised persons?	•	0
12.	Do y	you and the <i>related person</i> share the same physical location?	0	\odot
	1	al Name of Deleted Demons		
1.	•	al Name of <i>Related Person</i> : KSON NATIONAL LIFE INSURANCE COMPANY OF NEW YORK		
	JACI	ASON NATIONAL LIFE INSURANCE COMPANT OF NEW TORK		
2.	Prim	nary Business Name of Related Person:		
۷.		KSON NATIONAL LIFE INSURANCE COMPANY OF NEW YORK		
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or			
	Othe	er e		
4.		ated Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
	(5)	No Information Filed		
5.	Rela	ated Person is: (check all that apply)		
	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	☐ trust company		
	(j)	accountant or accounting firm		
	(k)	lawyer or law firm		
	(I)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	you control or are you controlled by the related person?	0	\odot
7.	Are y	you and the related person under common control?	\odot	0
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	\odot
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not	0	0
		operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds	_	_
		or securities that are maintained at the related person?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> assets:		
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		

		If this address is a private residence, check this box:	V	
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	
	` '	If the answer is yes, under what exemption?	0	•
	(5)	The distriction is yes, direct much exemption.		
10.	. (a)	Is the related person registered with a foreign financial regulatory authority?	0	•
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.		
	_	No Information Filed		
11.	. Do y	you and the related person share any supervised persons?	\odot	0
12	Dov	you and the <i>related person</i> share the same physical location?	_	
12.	. Боу	ou and the related person share the same physical location:	0	•
1.	-	al Name of <i>Related Person</i> : NVESTMENTS, INC.		
	Oii ii	WESTMENTS, INC.		
2.	Prim	nary Business Name of Related Person:		
	SII II	NVESTMENTS, INC.		
3.	Rola	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
J.		- 54935		
	or			
	Othe			
4	Rela	ated Person's		
		CRD Number (if any):		
		2225		
	(b)	CIK Number(s) (if any): No Information Filed		
		No information Filed		
5.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o)	broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant banking or thrift institution trust company accountant or accounting firm lawyer or law firm insurance company or agency pension consultant real estate broker or dealer sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	rou control or are you controlled by the related person?	\circ	⊙
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	•	0
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•
	` '	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	o	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> assets:		
	(-)	Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box:	Va-	NI-
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	
.	(b)	If the answer is yes, under what exemption?	0	⊙
	(~)			
10.	. (a)	Is the related person registered with a foreign financial regulatory authority?	0	@ I

	(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed		
11.	Do you and the <i>related person</i> share any <i>supervised persons</i> ?	•	0
12.	Do you and the <i>related person</i> share the same physical location?	0	•
1.	Legal Name of <i>Related Person</i> : PPM AMERICA, INC.		
2.	Primary Business Name of <i>Related Person</i> : PPM AMERICA INC		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	801 - 40783		
	or Other		
4	Related Person's		
4.	(a) CRD Number (if any):		
	107269 (b) CIK Number(s) (if any):		
	No Information Filed		
5.	Related Person is: (check all that apply)		
	 (a) □ broker-dealer, municipal securities dealer, or government securities broker or dealer (b) ☑ other investment adviser (including financial planners) 		
	(c) registered municipal advisor		
	(d) registered security-based swap dealer		
	 (e) ☐ major security-based swap participant (f) ☑ commodity pool operator or commodity trading advisor (whether registered or exempt from registration) 		
	(g) futures commission merchant		
	(h) banking or thrift institution		
	(i) trust company		
	 (j) accountant or accounting firm (k) lawyer or law firm 		
	(I) Insurance company or agency		
	(m) pension consultant		
	 (n) real estate broker or dealer (o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles 		
	(p) ✓ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
_	De construit de construit de la construit de l		No
ь.	Do you control or are you controlled by the related person?	0	•
7.	Are you and the related person under common control?	•	0
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:		
	Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:		
	If this address is a private residence, check this box:	.,	
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?		No ⊙
	(b) If the answer is yes, under what exemption?		٠
10	(a) Is the related person registered with a foreign financial regulatory authority?	_	
10.	(a) Is the related person registered with a foreign financial regulatory authority?(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.	0	•
	No Information Filed		
11.	Do you and the related person share any supervised persons?	0	•
12.	Do you and the <i>related person</i> share the same physical location?	0	•

1.	Legal Name of <i>Related Person</i> : INVEST FINANCIAL CORPORATION INSURANCE AGENCY, INC. OF DELAWARE		
2.	Primary Business Name of <i>Related Person</i> : INVEST FINANCIAL CORPORATION INSURANCE AGENCY INC. OF DELAWARE		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Other		
4.	Related Person's (a) CRD Number (if any):		
	(b) CIK Number(s) (if any): No Information Filed		
5.	Related Person is: (check all that apply) (a) broker-dealer, municipal securities dealer, or government securities broker or dealer (b) other investment adviser (including financial planners) (c) registered municipal advisor		
	 (d) registered security-based swap dealer (e) major security-based swap participant (f) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) 		
	 (g) futures commission merchant (h) banking or thrift institution 		
	(i) ☐ trust company(j) ☐ accountant or accounting firm		
	(k) awyer or law firm		
	(I) insurance company or agency(m) pension consultant		
	(n) real estate broker or dealer		
	 (o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (p) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles 		
		Yes	No.
6.	Do you control or are you controlled by the related person?	⊙	0
7.	Are you and the related person under common control?	•	0
8.	(a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	•
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?		0
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:		
	Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:		
	If this address is a private residence, check this box:	Vaa	. Na
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?		s No ⊙
	(b) If the answer is yes, under what exemption?	~	
10	. (a) Is the related person registered with a foreign financial regulatory authority?	_	_
10.	(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.	0	•
11.	No Information Filed . Do you and the <i>related person</i> share any <i>supervised persons</i> ?	•	0
		v	•
12.	. Do you and the <i>related person</i> share the same physical location?	•	0
Iten	n 7 Private Fund Reporting		
		Yes	s No
1			

0 0

B. Are you an adviser to any private fund?

If "yes," then for each private fund that you advise, you must complete a Section 7.B.(1) of Schedule D, except in certain circumstances described in the next sentence and in Instruction 6 of the Instructions to Part 1A. If you are registered or applying for registration with the SEC or reporting as an SEC exempt reporting adviser, and another SEC-registered adviser or SEC exempt reporting adviser reports this information with respect to any such private fund in Section 7.B.(1) of Schedule D of its Form ADV (e.g., if you are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D.

In either case, if you seek to preserve the anonymity of a private fund client by maintaining its identity in your books and records in numerical or alphabetical code, or similar designation, pursuant to rule 204-2(d), you may identify the private fund in Section 7.B.(1) or 7.B.(2) of Schedule D using the same code or designation in place of the fund's name.

SEC	TION	N 7.B.(1) <i>Private Fund</i> Reporting		
		No Information Filed		
SEC	TION	N 7.B.(2) Private Fund Reporting		
		No Information Filed		
		articipation or Interest in <i>Client</i> Transactions		
	veen	em, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which conflicts of interest many specific participation and interest that you expect to engage in during and your clients. Newly-formed advisers should base responses to these questions on the types of participation and interest that you expect to engage in during	-	
Like	Iten	n 7, Item 8 requires you to provide information about you and your related persons, including foreign affiliates.		
Pro	prie	tary Interest in <i>Client</i> Transactions		
A.		you or any related person:	Yes	No
	(1)		0	•
	(2)	buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ?	0	•
	(3)	recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))?	0	•
Sal	es In	nterest in <i>Client</i> Transactions		
B.	Do	you or any related person:	Yes	No
	(1)	as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)?	0	•
	(2)	recommend to advisory <i>clients</i> , or act as a purchaser representative for advisory <i>clients</i> with respect to, the purchase of securities for which you or any <i>related</i> person serves as underwriter or general or managing partner?	0	•
	(3)	recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	0	•
Inv	estm	nent or Brokerage Discretion		
C.	Do	you or any related person have discretionary authority to determine the:	Yes	No
	(1)	securities to be bought or sold for a client's account?	0	•
	(2)	amount of securities to be bought or sold for a <i>client's</i> account?	0	0
	(3)	broker or dealer to be used for a purchase or sale of securities for a client's account?	0	G
	(4)	commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	0	
D.	If yo	ou answer "yes" to C.(3) above, are any of the brokers or dealers related persons?	0	e
E.	Do	you or any related person recommend brokers or dealers to clients?	0	•
F.	If yo	ou answer "yes" to E. above, are any of the brokers or dealers related persons?	0	e
G.	(1)	Do you or any <i>related person</i> receive research or other products or services other than execution from a broker-dealer or a third party ("soft dollar benefits") in connection with <i>client</i> securities transactions?	0	•
	(2)	If "yes" to G.(1) above, are all the "soft dollar benefits" you or any <i>related persons</i> receive eligible "research or brokerage services" under section 28(e) of the Securities Exchange Act of 1934?	0	•
Н.	(1)	Do you or any related person, directly or indirectly, compensate any person that is not an employee for client referrals?	0	G
	(2)	Do you or any related person, directly or indirectly, provide any employee compensation that is specifically related to obtaining clients for the firm (cash or non-cash	0	

Do you or any related person, including any employee, directly or indirectly, receive compensation from any person (other than you or any related person) for client

compensation in addition to the employee's regular salary)?

referrals? In your response to Item 8.I., do not include the regular salary you pay to an employee. In responding to Items 8.H. and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in answering Item 8.H.) or received from (in answering Item 8.l.) any person in exchange for client referrals, including any bonus that is based, at least in part, on the number or amount of client referrals. Item 9 Custody In this Item, we ask you whether you or a related person has custody of client (other than clients that are investment companies registered under the Investment Company Act of 1940) assets and about your custodial practices. A. (1) Do you have custody of any advisory clients': Yes No (a) cash or bank accounts? (b) securities? • If you are registering or registered with the SEC, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your advisory fees directly from your clients' accounts, or (ii) a related person has custody of client assets in connection with advisory services you provide to clients, but you have overcome the presumption that you are not operationally independent (pursuant to Advisers Act rule 206(4)-2(d)(5)) from the related person. (2) If you checked "yes" to Item 9.A.(1)(a) or (b), what is the approximate amount of client funds and securities and total number of clients for which you have custody: Total Number of Clients U.S. Dollar Amount (a) \$ (b) If you are registering or registered with the SEC and you have custody solely because you deduct your advisory fees directly from your clients' accounts, do not include the amount of those assets and the number of those clients in your response to Item 9.A.(2). If your related person has custody of client assets in connection with advisory services you provide to clients, do not include the amount of those assets and number of those clients in your response to 9.A.(2). Instead, include that information in your response to Item 9.B.(2). B. (1) In connection with advisory services you provide to clients, do any of your related persons have custody of any of your advisory clients': Yes No (a) cash or bank accounts? (b) securities? \circ You are required to answer this item regardless of how you answered Item 9.A.(1)(a) or (b). (2) If you checked "yes" to Item 9.B.(1)(a) or (b), what is the approximate amount of client funds and securities and total number of clients for which your related persons have custody: U.S. Dollar Amount Total Number of Clients (a) \$ (b) C. If you or your related persons have custody of client funds or securities in connection with advisory services you provide to clients, check all the following that apply: (1) A qualified custodian(s) sends account statements at least quarterly to the investors in the pooled investment vehicle(s) you manage. (2) An independent public accountant audits annually the pooled investment vehicle(s) that you manage and the audited financial statements are distributed to the investors in the pools. (3) An independent public accountant conducts an annual surprise examination of client funds and securities. (4) An independent public accountant prepares an internal control report with respect to custodial services when you or your related persons are qualified custodians for client funds and securities. If you checked Item 9.C.(2), C.(3) or C.(4), list in Section 9.C. of Schedule D the accountants that are engaged to perform the audit or examination or prepare an internal control report. (If you checked Item 9.C.(2), you do not have to list auditor information in Section 9.C. of Schedule D if you already provided this information with respect to the private funds you advise in Section 7.B.(1) of Schedule D). D. Do you or your related person(s) act as qualified custodians for your clients in connection with advisory services you provide to clients? Yes No (1) you act as a qualified custodian 0 (2) your related person(s) act as qualified custodian(s) \circ If you checked "yes" to Item 9.D.(2), all related persons that act as qualified custodians (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)) must be identified in Section 7.A. of Schedule D, regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.

F. If you or your *related persons* have *custody* of *client* funds or securities, how many *persons*, including, but not limited to, you and your *related persons*, act as qualified custodians for your *clients* in connection with advisory services you provide to *clients*?

E. If you are filing your annual updating amendment and you were subject to a surprise examination by an independent public accountant during your last fiscal year, provide the

date (MM/YYYY) the examination commenced:

SECTION 9.C. Independent Public Accountant				
No Information Filed				
Item 10 Control Persons				
In this Item, we ask you to identify every <i>person</i> that, directly or indirectly, <i>controls</i> you. If you are filing an <i>umbrella registration</i> , the information in Item 10 shouladviser only.	ld be provided for the filing			
If you are submitting an initial application or report, you must complete Schedule A and Schedule B. Schedule A asks for information about your direct owners. Schedule B asks for information about your indirect owners. If this is an amendment and you are updating information you reported on either Schedule A or S you filed with your initial application or report, you must complete Schedule C.				
A. Does any <i>person</i> not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, <i>control</i> your management or policies?	Yes No			
If yes, complete Section 10.A. of Schedule D.				
B. If any <i>person</i> named in Schedules A, B, or C or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities please complete Section 10.B. of Schedule D.	Exchange Act of 1934,			
SECTION 10.A. Control Persons				
No Information Filed				
SECTION 10.B. Control Person Public Reporting Companies				
B. If any <i>person</i> named in Schedules A, B, or C, or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securitie please provide the following information (you must complete a separate Schedule D Section 10.B. for each public reporting company):	es Exchange Act of 1934,			
(1) Full legal name of the public reporting company:	PRUDENTIAL PLC			
(2) The public reporting company's CIK number (Central Index Key number that the SEC assigns to each reporting company):	1116578			
Item 11 Disclosure Information				
In this Item, we ask for information about your disciplinary history and the disciplinary history of all your <i>advisory affiliates</i> . We use this information to determin	ne whether to grant your			
application for registration, to decide whether to revoke your registration or to place limitations on your activities as an investment adviser, and to identify pote focus on during our on-site examinations. One event may result in "yes" answers to more than one of the questions below. In accordance with General Instruction and "your" include the <i>filing adviser</i> and all <i>relying advisers</i> under an <i>umbrella registration</i> .	ential problem areas to			
Your advisory affiliates are: (1) all of your current employees (other than employees performing only clerical, administrative, support or similar functions); (2) a partners, or directors (or any person performing similar functions); and (3) all persons directly or indirectly controlling you or controlled by you. If you are a "sept department or division" (SID) of a bank, see the Glossary of Terms to determine who your advisory affiliates are.				
If you are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten ye	ears following the date of			
the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years for event only in responding to Items 11.A.(1), 11.A.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). For purposes of calculating this ten-year period, the date of all order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed.	ollowing the date of an			
You must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.				
	Yes No			
Do any of the events below involve you or any of your supervised persons?	• c			
For "yes" answers to the following questions, complete a Criminal Action DRP:				
A. In the past ten years, have you or any advisory affiliate:	Yes No			
(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any felony?	0 0			
(2) been <i>charged</i> with any <i>felony</i> ?	○ ⊙			
If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.A.(2) to che pending.	harges that are currently			
B. In the past ten years, have you or any advisory affiliate:				
(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or <i>related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a concommit any of these offenses?				

	pending.		
For	"yes" answers to the following questions, complete a Regulatory Action DRP:		
C.	Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:	Yes	No
	(1) found you or any advisory affiliate to have made a false statement or omission?	0	•
	(2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?	0	•
	(3) found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4) entered an order against you or any advisory affiliate in connection with investment-related activity?	0	•
	(5) imposed a civil money penalty on you or any advisory affiliate, or ordered you or any advisory affiliate to cease and desist from any activity?	0	•
D.	Has any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority:		
	(1) ever found you or any advisory affiliate to have made a false statement or omission, or been dishonest, unfair, or unethical?	\odot	\circ
	(2) ever found you or any advisory affiliate to have been involved in a violation of investment-related regulations or statutes?	\odot	0
	(3) ever found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4) in the past ten years, entered an order against you or any advisory affiliate in connection with an investment-related activity?	\odot	0
	(5) ever denied, suspended, or revoked your or any advisory affiliate's registration or license, or otherwise prevented you or any advisory affiliate, by order, from associating with an investment-related business or restricted your or any advisory affiliate's activity?	•	0
E.	Has any self-regulatory organization or commodities exchange ever:		
	(1) found you or any advisory affiliate to have made a false statement or omission?	\circ	•
	(2) found you or any advisory affiliate to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the SEC)?	•	0
	(3) found you or any advisory affiliate to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4) disciplined you or any advisory affiliate by expelling or suspending you or the advisory affiliate from membership, barring or suspending you or the advisory affiliate from association with other members, or otherwise restricting your or the advisory affiliate's activities?	0	•
F.	Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any advisory affiliate ever been revoked or suspended?	0	•
G.	Are you or any advisory affiliate now the subject of any regulatory proceeding that could result in a "yes" answer to any part of Item 11.C., 11.D., or 11.E.?	0	•
For	"yes" answers to the following questions, complete a Civil Judicial Action DRP:		
H.	(1) Has any domestic or foreign court:	Yes	No
	(a) in the past ten years, enjoined you or any advisory affiliate in connection with any investment-related activity?	\circ	•
	(b) ever found that you or any advisory affiliate were involved in a violation of investment-related statutes or regulations?	\circ	•
	(c) ever dismissed, pursuant to a settlement agreement, an investment-related civil action brought against you or any advisory affiliate by a state or foreign financial regulatory authority?	0	•
	(2) Are you or any advisory affiliate now the subject of any civil proceeding that could result in a "yes" answer to any part of Item 11.H.(1)?	⊙	0

If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.B.(2) to charges that are currently

Item 12 Small Businesses

(2) been charged with a misdemeanor listed in Item 11.B.(1)?

The SEC is required by the Regulatory Flexibility Act to consider the effect of its regulations on small entities. In order to do this, we need to determine whether you meet the definition of "small business" or "small organization" under rule 0-7.

Answer this Item 12 only if you are registered or registering with the SEC **and** you indicated in response to Item 5.F.(2)(c) that you have regulatory assets under management of less than \$25 million. You are not required to answer this Item 12 if you are filing for initial registration as a state adviser, amending a current state registration, or switching from SEC to state registration.

For purposes of this Item 12 only:

- Total Assets refers to the total assets of a firm, rather than the assets managed on behalf of *clients*. In determining your or another *person's* total assets, you may use the total assets shown on a current balance sheet (but use total assets reported on a consolidated balance sheet with subsidiaries included, if that amount is larger).
- Control means the power to direct or cause the direction of the management or policies of a person, whether through ownership of securities, by contract, or otherwise. Any person that directly or indirectly has the right to vote 25 percent or more of the voting securities, or is entitled to 25 percent or more of the profits, of another person is presumed to control the other person.

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B.	Do you:			
	(1) control another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	0	0	
	(2) control another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	\circ	\circ	
C.	Are you:			
	(1) controlled by or under common control with another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	0	0	
	(2) controlled by or under common control with another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent	0	0	

⊙ ⊙

Schedule A

Direct Owners and Executive Officers

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- 1. Complete Schedule A only if you are submitting an initial application or report. Schedule A asks for information about your direct owners and executive officers. Use Schedule C to amend this information.
- 2. Direct Owners and Executive Officers. List below the names of:

If "ves." you do not need to answer Items 12.B. and 12.C.

A. Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?

- (a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer (Chief Compliance Officer is required if you are registered or applying for registration and cannot be more than one individual), director, and any other individuals with similar status or functions;
- (b) if you are organized as a corporation, each shareholder that is a direct owner of 5% or more of a class of your voting securities, unless you are a public reporting company (a company subject to Section 12 or 15(d) of the Exchange Act);

 Direct owners include any *person* that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 5% or more of a class of your voting securities. For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.
- (c) if you are organized as a partnership, <u>all</u> general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 5% or more of your capital:
- (d) in the case of a trust that directly owns 5% or more of a class of your voting securities, or that has the right to receive upon dissolution, or has contributed, 5% or more of your capital, the trust and each trustee; and
- (e) if you are organized as a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 5% or more of your capital, and (ii) if managed by elected managers, all elected managers.
- 3. Do you have any indirect owners to be reported on Schedule B? $_{f C}$ Yes $_{f C}$ No
- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner or executive officer is an individual.
- 5. Complete the Title or Status column by entering board/management titles; status as partner, trustee, sole proprietor, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
- 6. Ownership codes are: NA less than 5% B 10% but less than 25% D 50% but less than 75%
 - A 5% but less than 10% $\,$ C 25% but less than 50% $\,$ E 75% or more
- 7. (a) In the Control Person column, enter "Yes" if the person has control as defined in the Glossary of Terms to Form ADV, and enter "No" if the person does not have control. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are control persons.
 - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
 - (c) Complete each column.

FULL LEGAL NAME (Individuals: Last	DE/FE/	Title or Status	Date Title or Status	Ownership	Control	PR	CRD No. If None: S.S. No. and Date of
Name, First Name, Middle Name)			Acquired MM/YYYY	Code	Person		Birth, IRS Tax No. or Employer ID No.
NATIONAL PLANNING HOLDINGS,	DE	SHAREHOLDER	09/2000	Е	Υ	N	
INC.							
COLLINS, MAURA KATHRYN	I	SENIOR VICE PRESIDENT & CHIEF FINANCIAL	10/2015	NA	Υ	N	4761732
		OFFICER - NATIONAL PLANNING HOLDINGS					
GUNDERSON, GERRY A	I	NPH GENERAL COUNSEL & SVP OF	04/2007	NA	Υ	N	2448501
		REGULATORY AFFAIRS					
MILLER, JAMES PETER	I	NPH SVP, OPERATIONS; INTERIM CHIEF	04/2017	NA	Υ	N	1955960
		OPERATIONS OFFICER-INVEST					
WHITED, SANDRA RENEE	I	CCO-INVEST; 1ST VICE PRESIDENT-	02/2018	NA	Υ	N	2444134
		COMPLIANCE					
DOWDEN, STEVEN HOWARD	I	PRESIDENT, CEO, DIRECTOR; NPH PRESIDENT	02/2018	NA	Υ	N	2666894
		& CEO					
LAMBRECHTS, VANESSA MARIE	TI	VP, FINOP, CONTROLLER	04/2013	NA	Υ	N	4800775
RODRIGUEZ							
COLEMAN, CAREN LESLIE	Ti	VICE PRESIDENT	01/2010	NA	Υ	N	4298287
HARRIS, BRADLEY OLAN	I	DIRECTOR	02/2017	NA	Υ	N	6589930
MCCALLOP, PATRICIA ANN	1	NPH AND NPC SVP & CHIEF COMPLIANCE	06/2018	NA	Υ	Υ	5059176
		OFFICER					

Schedule B

Indirect Owners

1. Complete Schedule B only if you are submitting an initial application or report. Schedule B asks for information about your indirect owners; you must first complete Schedule A,

which asks for information about your direct owners. Use Schedule C to amend this information.

- 2. Indirect Owners. With respect to each owner listed on Schedule A (except individual owners), list below:
 - (a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation;

For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.

- (b) in the case of an owner that is a partnership, <u>all</u> general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital;
- (c) in the case of an owner that is a trust, the trust and each trustee; and
- (d) in the case of an owner that is a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.
- 3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Exchange Act) is reached, no further ownership information need be given.
- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner is an individual.
- 5. Complete the Status column by entering the owner's status as partner, trustee, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
- 6. Ownership codes are: C 25% but less than 50% E 75% or more
 - D 50% but less than 75% F Other (general partner, trustee, or elected manager)
- 7. (a) In the Control Person column, enter "Yes" if the person has control as defined in the Glossary of Terms to Form ADV, and enter "No" if the person does not have control. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are control persons.
 - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
 - (c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name,	DE/FE/I	Entity in Which Interest	Status	Date Status	Ownership	Control	PR	CRD No. If None: S.S. No. and Date of
First Name, Middle Name)		is Owned		Acquired	Code	Person		Birth, IRS Tax No. or Employer ID No.
				MM/YYYY				
JACKSON HOLDINGS LLC	DE	NATIONAL PLANNING	SHAREHOLDER	04/2006	E	Υ	N	
		HOLDINGS, INC.						
PRUDENTIAL PLC	FE	PRUDENTIAL (US	SHAREHOLDER	12/2015	E	Υ	Υ	
		HOLDCO1)						
PRUDENTIAL (US HOLDCO1)	FE	BROOKE (HOLDCO1)	SHAREHOLDER	04/2006	E	Υ	N	
		INC						
BROOKE (HOLDCO1) INC.	DE	JACKSON HOLDINGS	SHAREHOLDER	12/2015	E	Υ	N	
		LLC						

Schedule D - Miscellaneous

You may use the space below to explain a response to an Item or to provide any other information.

On August 15, 2017 National Planning Holdings, Inc. ("NPH"), the parent company of Invest Financial Corporation (IFC), announced it had entered into an asset purchase agreement with LPL Financial, LLC ("LPL") to transfer assets associated with its independent broker dealer network, including those associated with IFC. As a result, IFC is in the process of winding down its business operations. Effective February 14, 2018, the majority of IFC's accounts were transferred to LPL or other firms and as of that date the firm does not have any producing registered representatives or investment advisor representatives. IFC notified clients that it is terminating all advisory agreements. As of the date of this filing, IFC does not have any advisory clients. Any remaining non-managed, brokerage accounts that do not transfer to LPL or another firm will become house accounts of their respective custodians prior to the withdrawal of our SEC registration as a broker-dealer and our FINRA membership. IFC anticipates filing an ADV-W to withdraw its registration as an SEC registered investment advisor during calendar year 2018.

Schedule R

No Information Filed

DRP Pages

CRIMINAL DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)

GENERAL INSTRUCTIONS

This Disclosure Reporting Page (DRP ADV) is an C INITIAL OR S AMENDED response used to report details for affirmative responses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.

of Fo	orm ADV.					
			Regulatory Action	1		
Che	ck item(s) being responded to:					
	11.C(1)	□ 11.C(2)	☐ 11.C(3)	□ 11.C(4)	□ 11.C(5)	
	11.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)	
		. ,	* *	* *	L 11.D(3)	
	11.E(1)	☑ 11.E(2)	□ 11.E(3)	□ 11.E(4)		
	11.F.	□ 11.G.				
Exe	cution Page.		me event or <i>proceeding</i> may be reported			
	<u>-</u>		to Items 11.C., 11.D., 11.E., 11.F. or 11.C for each action on a separate DRP.	5. Use only one DRP to report deta	ails related to the same event. If an event gives	
PAR	ті					
A.	The person(s) or entity(ies) for You (the advisory firm)	whom this DRP is beir	ng filed is (are):			
	C You and one or more of you					
	One or more of your advisor	ory affiliates				
		-	the full name of the <i>advisory affiliate</i> beloat at number. If not, indicate "non-registered	•	-	
	ADV DRP - ADVISORY AFFIL	IATE				
			No Information I	Filed		
	 □ This DRP should be removed from the ADV record because the advisory affiliate(s) is no longer associated with the adviser. □ This DRP should be removed from the ADV record because: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an exempt reporting adviser with the SEC and the event was resolved in the adviser's or advisory affiliate's favor. If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. □ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances: 					
B.	If the advisory affiliate is registed event? If the answer is "Yes," n			affiliate submitted a DRP (with Fo	orm ADV, BD or U-4) to the IARD or <i>CRD</i> for the	
	⊙ Yes C No					
	NOTE: The completion of this f	form does not relieve th	ne advisory affiliate of its obligation to upo	date its IARD or <i>CRD</i> records.		
PAR	T II					
1.	Regulatory Action initiated by: O SEC Other Federal	State • SRO OF	oreign			
	(Full name of regulator, <i>foreign</i> NASDR, INC.	n financial regulatory at	uthority, federal, state, or SRO)			
2.	Principal Sanction: Censure Other Sanctions: VIOLATION OF NASD CONDU) (7), 3010 (B) (1), 3010 (B) (2), 301	10 (C) AND 3070 (A) (2), (B), AND (C), MSRB	
3.	Date Initiated (MM/DD/YYYY):					
	10/23/1998 Exact Ex If not exact, provide explanation					
4.	Docket/Case Number: CO7990001-AWC					
5.	Advisory Affiliate Employing Fi	rm when activity occurr	red which led to the regulatory action (if a	pplicable):		

IFC HOLDINGS, INC.

6.	Principal Product Type: No Product Other Product Types:				
7.	Describe the allegations related to this regulator VIOLATION OF NASD CONDUCT RULES 2110 RULE G-27 (C) (VII) (B) AND MEMBERSHIP RU	(B) (20) (A), 3010 (A) (2), 3010 (A) (5), 3		10 (C) AND 3070 (A) (2), (B), AND (C),	MSRB
8.	Current Status? C Pending C On Appe	al 🧿 Final			
9.	If on appeal, regulatory action appealed to (SEC	, <i>SRO,</i> Federal or State Court) and Date	e Appeal Filed:		
lf Fi	inal or On Appeal, complete all items below. For F	Pending Actions, complete Item 13 only			
10.	How was matter resolved:				
	Acceptance, Waiver & Consent(AWC)				
11.	Resolution Date (MM/DD/YYYY):				
	02/09/1999				
	If not exact, provide explanation:				
12.	Resolution Detail:				
	A. Were any of the following Sanctions Order	ed (check all appropriate items)?			
	Monetary/Fine Amount: \$ 75,000.00		_		
	Revocation/Expulsion/Denial		☐ Disgorgement/Restitution		
	☐ Censure		Cease and Desist/Injunction		
	□ BarB. Other Sanctions <i>Ordered</i>:		☐ Suspension		
	AN INDEPENDENT CONSULTING FIRM TO Sanction detail: if suspended, <i>enjoined</i> or Principal, etc.). If requalification by exam/re condition has been satisfied. If disposition you or an <i>advisory affiliate</i> , date paid and if FINE OF \$75,000 PAID	barred, provide duration including start training was a condition of the sanction resulted in a fine, penalty, restitution, c	date and capacities affected (General So , provide length of time given to requalify,	ecurities Principal, Financial Operation retrain, type of exam required and who	ether
13.	Provide a brief summary of details related to the provided)	e action status and (or) disposition and	include relevant terms, conditions and da	ates (your response must fit within the	space
		GENERAL INS			
	s Disclosure Reporting Page (DRP ADV) is an O	INITIAL OR © AMENDED response u	sed to report details for affirmative respo	nses to Items 11.C., 11.D., 11.E., 11.F.	or 11.G.
		Damulatan	. A ation		
Che	ck item(s) being responded to:	Regulatory	Action		
<u> </u>	11.C(1) □ 11.C(2)	☐ 11.C(3)	□ 11.C(4)	☐ 11.C(5)	
	11.D(1) ☑ 11.D(2)	□ 11.D(3)	☑ 11.D(4)	□ 11.D(5)	
	11.E(1)	☐ 11.E(3)	□ 11.E(4)		
L 1	11.F. □ 11.G.				
	a separate DRP for each event or <i>proceeding</i> . T cution Page.	he same event or <i>proceeding</i> may be re	eported for more than one <i>person</i> or enti	y using one DRP. File with a complete	∌d
	event may result in more than one affirmative and to actions by more than one regulator, provide de			ails related to the same event. If an eve	nt gives

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

	C You and one or more of your advisory affiliates
	One or more of your advisory affiliates
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name). If the <i>advisory affiliate</i> has a <i>CRD</i> number, provide that number. If not, indicate "non-registered" by checking the appropriate box.
	ADV DRP - ADVISORY AFFILIATE
	No Information Filed
	☐ This DRP should be removed from the ADV record because the advisory affiliate(s) is no longer associated with the adviser. ☐ This DRP should be removed from the ADV record because: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an exempt reporting adviser with the SEC and the event was resolved in the adviser's or advisory affiliate's favor.
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.
	☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.
	O Yes O No
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
PAR	TII
1.	Regulatory Action initiated by: O SEC Other Federal State O SRO O Foreign
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) NEW HAMPSHIRE, DEPT. OF STATE, BUREAU OF SECURITIES REGULATION
2.	Principal Sanction:
	Other Other Sanctions:
	CONSENT ORDER BY STATE OF NEW HAMPSHIRE REQUIRES A CONTRIBUTION OF \$1000.00 TO THE STATE OF NEW HAMPSHIRE'S INVESTOR EDUCATION FUND.
3.	Date Initiated (MM/DD/YYYY):
	04/18/2000 Exact Explanation If not exact, provide explanation:
4.	Docket/Case Number: COM 99-009
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Principal Product Type: CD(s)
	Other Product Types:
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): ON MAY 12, 2000 IFC HOLDINGS, INC D/B/A INVEST FINANCIAL CORPORATION SIGNED A CONSENT ORDER TO THE STATE OF NH REGARDING A FORMER BROKER WITHOUT ALLEGING OR DENYING THE FINDINGS SET FORTH IN THE CONSENT ORDER. FORMER BROKER OF APPLICANT ALLEGEDLY MISREPRESENTED BROKERED CD'S TO CLIENTS WHO WERE RESIDENTS IN NH. IFC HOLDINGS, INC AGREED TO A PAYMENT OF \$1000.00 FOR RESTITUTION.
8.	Current Status? C Pending C On Appeal Final
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:
lf F	inal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.
10.	How was matter resolved:

	Order					
11	Desclution Data (M	M/DD/A/A/A				
11.	Resolution Date (M	_				
		act C Explanation				
	If not exact, provide	e explanation:				
12.	Resolution Detail:					
	A. Were any of t	the following Sanctions Ordered (che	eck all appropriate items)?			
		//Fine Amount: \$ 1,000.00	,			
	,	on/Expulsion/Denial	F.	Disgorgement/Restitution		
	Censure		Г	Cease and Desist/Injunction		
	☐ Bar			Suspension		
13.	B. Other Sanctions Ordered: ON MAY 12, 2000 IFC HOLDINGS, INC D/B/A INVEST FINANCIAL CORPORATION SIGNED A CONSENT ORDER TO THE STATE OF NH REGARDING A FORMER BROKER WITHOUT ALLEGING OR DENYING THE FINDINGS SET FORTH IN THE CONSENT ORDER. FORMER BROKER OF APPLICANT ALLEGEDLY MISREPRESENTED BROKERED CD'S TO CLIENTS WHO WERE RESIDENTS OF NH. IFC HOLDINGS, INC AGREED TO A PAYMENT OF \$1000.00 FOR RESTITUTION Sanction detail: if suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an advisory affiliate, date paid and if any portion of penalty was waived: ON MAY 12, 2000 IFC HOLDINGS, INC D/B/A INVEST FINANCIAL CORPORATION SIGNED A CONSENT ORDER TO THE STATE OF NH REGARDING A FORMER BROKER WITHOUT ALLEGING OR DENYING THE FINDINGS SET FORTH IN THE CONSENT ORDER. FORMER BROKER OF APPLICANT ALLEGEDLY MISREPRESENTED BROKERED CD'S TO CLIENTS WHO WERE RESIDENTS OF NH. IFC HOLDINGS, INC AGREED TO A PAYMENT OF \$1000.00 FOR RESTITUTION. 13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided). ON MAY 12, 2000 IFC HOLDINGS, INC D/B/A INVEST FINANCIAL CORPORATION SIGNED A CONSENT ORDER TO THE STATE OF NH REGARDING A FORMER BROKER WITHOUT ALLEGING OR DENYING THE FINDINGS SET FORTH IN THE CONSENT ORDER. FORMER BROKER OF APPLICANT OFFERED AND SOLD BROKERED CD'S FROM THE STATE OF NEW HAMPSHIRE. IFC HOLDINGS, INC AGREED TO A PAYMENT OF \$1000.00 FOR RESTITUTION.					
		ng Page (DRP ADV) is an 👩 INITIAI			nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G	i.
	Disclosure Reportir	ng Page (DRP ADV) is an 🂍 INITIAI	OR AMENDED response used to	o report details for affirmative respo	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G	i.
of Fo	orm ADV.			o report details for affirmative respo	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G	i.
of Fo	orm ADV. eck item(s) being res	ponded to:	OR	o report details for affirmative respo		i.
of Fo	orm ADV. ock item(s) being res 11.C(1)	sponded to:	AMENDED response used to Regulatory Action	o report details for affirmative respo	□ 11.C(5)	ì.
of Fo	orm ADV. eck item(s) being res	ponded to:	OR	o report details for affirmative respo		i.
Che	orm ADV. ock item(s) being res 11.C(1) 11.D(1)	ponded to: ☐ 11.C(2) ☑ 11.D(2)	Regulatory Action 11.C(3)	o report details for affirmative respo	□ 11.C(5)	i.
Of Fo	orm ADV. ack item(s) being res 11.C(1) 11.D(1) 11.E(1) 11.F. a separate DRP for cution Page. e event may result in to actions by more the	ponded to: ☐ 11.C(2) ☐ 11.D(2) ☐ 11.E(2) ☐ 11.G. each event or <i>proceeding</i> . The same	Regulatory Actions 11.C(3) 11.D(3) 11.E(3) 11.E(3)	or report details for affirmative responds 11.C(4) 11.D(4) 11.E(4)	□ 11.C(5)	
Of For Chee	orm ADV. ock item(s) being result.C(1) 11.C(1) 11.E(1) 11.F. a separate DRP for cution Page. e event may result in to actions by more the	ponded to: 11.C(2) 11.D(2) 11.E(2) 11.G. each event or <i>proceeding</i> . The same more than one affirmative answer to han one regulator, provide details for	Regulatory Action 11.C(3) 11.D(3) 11.E(3) Resolution of the event or proceeding may be reported by the event of the ev	or report details for affirmative responds 11.C(4) 11.D(4) 11.E(4)	☐ 11.C(5) ☐ 11.D(5) ty using one DRP. File with a completed	
Of Fo	orm ADV. ock item(s) being result.C(1) 11.C(1) 11.E(1) 11.F. a separate DRP for cution Page. e event may result in to actions by more the	ponded to: 11.C(2) 11.D(2) 11.E(2) 11.G. each event or <i>proceeding</i> . The same more than one affirmative answer to han one regulator, provide details for the notity (ies) for whom this DRP is being	Regulatory Action 11.C(3) 11.D(3) 11.E(3) Resolution of the event or proceeding may be reported by the event of the ev	or report details for affirmative responds 11.C(4) 11.D(4) 11.E(4)	☐ 11.C(5) ☐ 11.D(5) ty using one DRP. File with a completed	
Of For Chee	orm ADV. ack item(s) being result.C(1) 11.D(1) 11.E(1) 11.F. a separate DRP for cution Page. e event may result in to actions by more the cution of the c	ponded to: 11.C(2) 11.D(2) 11.E(2) 11.G. each event or <i>proceeding</i> . The same more than one affirmative answer to han one regulator, provide details for the contity (ies) for whom this DRP is being bry firm)	Regulatory Action 11.C(3) 11.D(3) 11.E(3) Resolution of the event or proceeding may be reported by the event of the ev	or report details for affirmative responds 11.C(4) 11.D(4) 11.E(4)	☐ 11.C(5) ☐ 11.D(5) ty using one DRP. File with a completed	
Of For Chee	orm ADV. ock item(s) being result.C(1) 11.D(1) 11.E(1) 11.F. a separate DRP for cution Page. e event may result in to actions by more the cution of the c	ponded to: 11.C(2) 11.D(2) 11.E(2) 11.G. each event or <i>proceeding</i> . The same more than one affirmative answer to han one regulator, provide details for the intity(ies) for whom this DRP is being any firm) remore of your advisory affiliates	Regulatory Action 11.C(3) 11.D(3) 11.E(3) Resolution of the event or proceeding may be reported by the event of the ev	or report details for affirmative responds 11.C(4) 11.D(4) 11.E(4)	☐ 11.C(5) ☐ 11.D(5) ty using one DRP. File with a completed	
Of For Chee	orm ADV. ock item(s) being result.C(1) 11.C(1) 11.E(1) 11.F. a separate DRP for cution Page. e event may result in to actions by more the cution of the c	apponded to: □ 11.C(2) □ 11.D(2) □ 11.E(2) □ 11.G. each event or <i>proceeding</i> . The same more than one affirmative answer to han one regulator, provide details for the notity (ies) for whom this DRP is being ory firm) The more of your advisory affiliates your advisory affiliates g filed for an advisory affiliate, give the	Regulatory Action 11.C(3) 11.D(3) 11.E(3) Resolution of the event or proceeding may be reported by the event of the ev	or report details for affirmative responds 11.C(4) 11.D(4) 11.E(4) and for more than one <i>person</i> or entity. G. Use only one DRP to report details. It is a subject to the control of the control o	☐ 11.C(5) ☐ 11.D(5) ty using one DRP. File with a completed ails related to the same event. If an event gives	
Of For Chee	orm ADV. ock item(s) being result.C(1) 11.C(1) 11.E(1) 11.F. a separate DRP for cution Page. e event may result in to actions by more the cution of the c	apponded to: □ 11.C(2) □ 11.D(2) □ 11.E(2) □ 11.G. each event or <i>proceeding</i> . The same more than one affirmative answer to han one regulator, provide details for the notice of your advisory affiliates your advisory affiliates g filed for an advisory affiliate, give the late has a CRD number, provide that	Regulatory Actions and the second sec	or report details for affirmative responds 11.C(4) 11.D(4) 11.E(4) and for more than one <i>person</i> or entity. G. Use only one DRP to report details. It is a subject to the control of the control o	☐ 11.C(5) ☐ 11.D(5) ty using one DRP. File with a completed ails related to the same event. If an event gives	
Of For Chee	orm ADV. ck item(s) being result.C(1) 11.C(1) 11.E(1) 11.F. a separate DRP for cution Page. e event may result in to actions by more the cution of the cu	ponded to: 11.C(2) 11.D(2) 11.E(2) 11.G. each event or proceeding. The same more than one affirmative answer to han one regulator, provide details for the notice of your advisory affiliates your advisory affiliates g filed for an advisory affiliate, give the late has a CRD number, provide that SORY AFFILIATE	Regulatory Actions and the segulatory Actions and the segulatory Actions and the segulatory Actions are event or proceeding may be reported by the segulatory and the segulatory and the segulatory are event or proceeding may be reported by the segulatory and th	oreport details for affirmative responds 11.C(4) 11.D(4) 11.E(4) and for more than one <i>person</i> or entity and G. Use only one DRP to report details and the second of the second o	☐ 11.C(5) ☐ 11.D(5) ty using one DRP. File with a completed ails related to the same event. If an event gives	
Of For Chee	a separate DRP for cution Page. e event may result in to actions by more the company of the person (s) or end of the company	ponded to: 11.C(2) 11.D(2) 11.E(2) 11.G. each event or proceeding. The same more than one affirmative answer to han one regulator, provide details for intity(ies) for whom this DRP is being bry firm) more of your advisory affiliates your advisory affiliates g filed for an advisory affiliate, give the late has a CRD number, provide that SORY AFFILIATE	Regulatory Actions and the second sec	oreport details for affirmative responds 11.C(4) 11.D(4) 11.E(4) and for more than one <i>person</i> or entity and G. Use only one DRP to report details and the second of the second o	☐ 11.C(5) ☐ 11.D(5) ty using one DRP. File with a completed ails related to the same event. If an event gives	

	(For individuals, Last, First, Middle)
	This DRP should be removed from the ADV record because the advisory affiliate(s) is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an exempt reporting adviser with the SEC and the event was resolved in the adviser's or advisory affiliate's favor.
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.
	C Yes
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
PAR	ŢII
1.	Regulatory Action initiated by: Ose Other Federal State Ose OForeign
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) SOUTH DAKOTA DIVISION OF INSURANCE
2.	Principal Sanction: Civil and Administrative Penalt(ies) /Fine(s) Other Sanctions:
3.	Date Initiated (MM/DD/YYYY):
	09/27/1993 Exact Explanation If not exact, provide explanation:
4.	Docket/Case Number: NONE
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Principal Product Type: Insurance Other Product Types:
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): INVEST FINANCIAL CORP. INSURANCE AGENCY INC. OF IL FAILED TO DISCLOSE ON ITS APPLICATION THE ADMINISTRATIVE ACTION OF THE KANSAS INSURANCE DEPT.
8.	Current Status? C Pending C On Appeal Final
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:
If F	inal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.
10.	How was matter resolved: Consent
11.	Resolution Date (MM/DD/YYYY):
	10/07/1993 © Exact © Explanation If not exact, provide explanation:
12.	Resolution Detail:
	A. Were any of the following Sanctions Ordered (check all appropriate items)?

Name:

INVEST FINANCIAL CORP.

✓ Monetary/Fine Amount: \$ 100.00

Revo	ocation/Expulsion/Denial	ſ	Disgorgement/Restitution			
Cen:	sure	1	Cease and Desist/Injunction			
☐ Bar		☐ Suspension				
B. Other Sa	anctions Ordered:					
Principal condition you or ar	, etc.). If requalification by exam/retrain	ing was a condition of the sanction, provided in a fine, penalty, restitution, disgo	vide length of time given to requalify/	ecurities Principal, Financial Operations retrain, type of exam required and whether provide total amount, portion levied against		
13. Provide a brie	f summary of details related to the acti	on status and (or) disposition and inclu	de relevant terms, conditions and da	ates (your response must fit within the space		
FAILED TO DI		DMINISTRATION ACTION IN KANSAS		L 58-30-43, WHICH ALLEGES THAT "INVEST" ED 4/13/93, WHERE "INVEST" FAILED TO		
		GENERAL INSTRUC	CTIONS			
This Disclosure Rep	porting Page (DRP ADV) is an 👝 INIT			nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G		
of Form ADV.		OR ♥				
Check item(s) being	a responded to:	Regulatory Acti	on			
Ineck item(s) being	g responded to. ☐ 11.C(2)	□ 11.C(3)	□ 11.C(4)	☐ 11.C(5)		
□ 11.D(1)	□ 11.0(2)	□ 11.D(3)	□ 11.D(4)	☐ 11.D(5)		
, ,		* *		L 11.D(5)		
□ 11.E(1)	☑ 11.E(2)	□ 11.E(3)	□ 11.E(4)			
□ 11.F.	☐ 11.G.					
•	ore than one regulator, provide details	for each action on a separate DRP.				
PARTI						
A. The person(s) O You (the ac	or entity(ies) for whom this DRP is bei dvisory firm)	ng filed is (are):				
You and or	ne or more of your advisory affiliates					
	re of your advisory affiliates					
If the advisory		the full name of the <i>advisory affiliate</i> be at number. If not, indicate "non-register	·	•		
CRD Numbe	er: <u>2225</u>	This advisory affiliate is . a Firm	an Individual			
Registered:	⊙ Yes C No					
Name:	SII INVESTMENTS, INC. (For individuals, Last, First, Middle)					
CRD Numbe	er: <u>12984</u>	This advisory affiliate is . a Firm	an Individual			
Registered:	⊙ Yes ○ No	•				
Name:	IFC HOLDINGS, INC.					
	(For individuals, Last, First, Middle)					
CRD Number:	29604	This advisory affiliate is • a Firm	an Individual			
Registered:						
Name:	NATIONAL PLANNING					
	CORPORATION					
	(For individuals Last First Middle)					

	CRD Number:	<u>16443</u>	This advisory affiliate is . a Firm . an Individual	
	Registered:		No N	
		AMERICA, I	NC. uals, Last, First, Middle)	
	This DRP	should be re	emoved from the ADV record because the advisory affiliate(s) is no longer associated with the adviser. emoved from the ADV record because: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is registered or applying for the control of the adviser is registered or applying for the control of the adviser is registered or applying for the control of the adviser of the adviser is registered or applying for the control of the adviser of the adviser of the adviser of the adviser is registered or applying for the adviser of the advi	for
			gistering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event ears ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten year	
	☐ This DRP	should be re	emoved from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:	
B.			egistered through the IARD system or <i>CRD</i> system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or <i>CRD</i> for s," no other information on this DRP must be provided.	or the
	• Yes •	No		
	NOTE: The co	ompletion of t	this form does not relieve the <i>advisory affiliate</i> of its obligation to update its IARD or <i>CRD</i> records.	
PAR	rT II			
1.	,		by: I O State O SRO O Foreign	
			reign financial regulatory authority, federal, state, or SRO)	
2.	Principal San	ction:		
	Other Sanction	ons:		
3.	Date Initiated			
	C Exact C	•		
4.	Docket/Case	Number:		
5.	Advisory Affili	<i>iate</i> Employin	ng Firm when activity occurred which led to the regulatory action (if applicable):	
6.	Principal Prod	duct Type:		
	Other Produc	t Types:		
7.	Describe the	allegations re	elated to this regulatory action (your response must fit within the space provided):	
8.	Current Statu	s? C Pe	ending C On Appeal C Final	
9.	If on appeal, I	regulatory ac	tion appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:	
If F	inal or On App	eal, complete	e all items below. For Pending Actions, complete Item 13 only.	
10.	How was mat	tter resolved:		
11.	Resolution Da	ate (MM/DD/Y	YYY):	
	C Exact C	Explanatio	n	
	If not exact, p	rovide explan	ation:	
12.	Resolution D			
	A. Were ar	ny of the follo	wing Sanctions Ordered (check all appropriate items)?	

☐ Monetary/Fine Amount: \$

Cer	2011ko		- ID : (/I : .:	
	isure	·	Cease and Desist/Injunction	
Bar		1	Suspension	
B. Other S	anctions Ordered:			
Principa conditio	al, etc.). If requalification by exam/retra	ining was a condition of the sanction, pro sulted in a fine, penalty, restitution, disgo	vide length of time given to requalify,	ecurities Principal, Financial Operations /retrain, type of exam required and whether , provide total amount, portion levied agains
Provide a brie provided).	ef summary of details related to the ac	ction status and (or) disposition and inclu	de relevant terms, conditions and da	ates (your response must fit within the spac
		CENEDAL INSTRU	CTIONS	
Disclosure Re	eporting Page (DRP ADV) is an 👝 INI	GENERAL INSTRU TIAL AR AMENDED response used		nses to Items 11.C., 11.D., 11.E., 11.F. or 1
orm ADV.	Ü	OR ©		
ak itam(a) hain	ag raapandad ta	Regulatory Act	on	
ck item(s) beir I1.C(1)	ng responded to:	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
11.D(1)	☐ 11.D(2)	□ 11.D(3)	□ 11.C(4) □ 11.D(4)	□ 11.D(5)
		* *	` '	L 11.D(5)
11.E(1) 11.F.	☑ 11.E(2) ☐ 11.G.	☐ 11.E(3)	□ 11.E(4)	
a separate DR	RP for each event or <i>proceeding</i> . The	same event or proceeding may be repor	ed for more than one <i>person</i> or enti	ty using one DRP. File with a completed
cution Page.				
event may res	sult in more than one affirmative answenore than one regulator, provide detail		I.G. Use only one DRP to report deta	ails related to the same event. If an event giv
event may res			.G. Use only one DRP to report deta	ails related to the same event. If an event giv
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	registration with the SEC or reporting as an exempt reporting adviser with the SEC and the event was resolved in the adviser's or advisory affiliate's favor.
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
3.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.
	⊙ Yes C No
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
AR	T II
۱.	Regulatory Action initiated by: O SEC Other Federal O State SRO O Foreign
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) NASD
2.	Principal Sanction: Civil and Administrative Penalt(ies) /Fine(s) Other Sanctions: CENSURE
3.	Date Initiated (MM/DD/YYYY):
	09/23/2005 Exact Explanation If not exact, provide explanation:
1.	Docket/Case Number: EAF 0400780002
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable): N/A
6.	Principal Product Type: Mutual Fund(s) Other Product Types:
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): BETWEEN JANUARY 2001 AND DECEMBER 2003, RESPONDENT FIRM AND OTHER BROKER-DEALER AFFILIATES (COLLECTIVELY, THE "FIRMS") MAINTAINED SHELF SPACE (OR REVENUE SHARING) PROGRAMS (THE "PREMIER SPONSOR PROGRAM") PURSUANT TO WHICH, IN RETURN FOR A FEE, PARTICIPATING MUTUAL FUND COMPLEXES RECEIVED PREFERENTIAL TREATMENT FROM THE FIRMS IN THE MARKETING OF FUNDS AND IN ACCESS TO THE FIRMS' RETAIL BROKERAGE SALES FORCE. PARTICIPANTS IN THE PROGRAM PAID SOME OR ALL OF THEIR FEES FOR PARTICIPATING IN THE PROGRAM BY DIRECTING APPROXIMATELY \$12.54 MILLION IN MUTUAL FUND PORTFOLIO BROKERAGE COMMISSIONS THROUGH TWO CLEARING BROKERS. THE FIRMS DID NOT ACTUALLY EXECUTE ANY TRADES FOR THE FUND COMPLEXES. NASD CONDUCT RULES 2830(K) AND 2110.
3.	Current Status? C Pending C On Appeal Final
9.	If on appeal, regulatory action appealed to (SEC, <i>SRO</i> , Federal or State Court) and Date Appeal Filed: N/A
f Fi	nal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.
10.	How was matter resolved:
	Acceptance, Waiver & Consent(AWC)
11.	Resolution Date (MM/DD/YYYY):
	09/23/2005 © Exact C Explanation
	If not exact, provide explanation:
12.	Resolution Detail:
	A. Were any of the following Sanctions Ordered (check all appropriate items)?

	Monetary/Fine Am	nount: \$ 1,520,000.00					
	Revocation/Expu	Ision/Denial	r	Disgorgement/Restitution			
	Censure		Γ	Cease and Desist/Injunction			
	☐ Bar		Г	Suspension			
	B. Other Sanctions Orde	ered:					
	N/A						
	Sanction detail: if sus	spended, <i>enjoined</i> or barred,	provide duration including start date	and capacities affected (General Se	curities Principal, Financial Operations		
		<u>-</u>	-		retrain, type of exam required and whether		
				gement or monetary compensation,	provide total amount, portion levied against		
	you or an <i>advisory aff</i> \$1,520,000.00 PAID 0	filiate, date paid and if any po	ortion of penalty was waived:				
	φ1,320,000.00 FAID C	JCTOBER 3, 2003					
	provided).	f details related to the action	status and (or) disposition and inclu-	de relevant terms, conditions and da	tes (your response must fit within the space		
		CONSENTS WITHOUT ADM	MITTING OR DENVING THE ALLEGAT	TIONS OR FINDINGS TO A VIOLATIO	ON OF NASD CONDUCT RULES 2830(K) AND		
		A CENSURE AND FINE OF		IONS ON INDINGS TO A VIOLATIC	ON OF MASE CONDUCT ROLLS 2000(N) AND		
			Ţ.,o_0,000.00				
			CENEDAL INSTRU	STIONS			
his	Disclosure Reporting Page	(DRP ADV) is an A INITIAL	GENERAL INSTRUC AMENDED response used t		nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.		
	rm ADV.	7 - 0	OR ®		, , ,		
1 FO	IIII ADV.						
			Regulatory Acti	on			
	k item(s) being responded						
	1.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)		
1	1.D(1)	☑ 11.D(2)	□ 11.D(3)	☑ 11.D(4)	□ 11.D(5)		
1	1.E(1)	□ 11.E(2)	□ 11.E(3)	□ 11.E(4)			
<u> </u>	1.F.	□ 11.G.					
	<u>=</u>		Items 11.C., 11.D., 11.E., 11.F. or 11 each action on a separate DRP.	.G. Use only one DRP to report deta	ils related to the same event. If an event gives		
'AR	П						
A.	The person(s) or entity(ies)	for whom this DRP is being	filed is (are):				
	You (the advisory firm)						
	Vou and one or more of	f vour					
	O You and one or more of						
	One or more of your add	visory affiliates					
	K41: DDD: 1 : K1 14				A4-14		
			e full name of the <i>advisory affiliate</i> be number. If not, indicate "non-register	•	name, Middle name).		
	ADV DRP - ADVISORY AF	FILIATE					
			No Information	Filed			
			because the advisory affiliate(s) is no				
		This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.					
	registration with the OL	or reporting as an exempt	reporting adviser with the SEC and t	ne event was resolved in the adviser	S of advisory affiliate's lavor.		
	If you are registered or reg	sistering with a state securitie	es authority , you may remove a DRP i	or an event you reported only in resp	onse to Item 11.D(4), and only if that event		
	occurred more than ten year	ars ago. If you are registered	or registering with the SEC, you may	remove a DRP for any event listed i	in Item 11 that occurred more than ten years		
	ago.						
	This DDD should be seen		hanna itaan Kiladin amaa ayah a	due to a classical or data costinuosistal	les Forelais the sinconstance		
	I his DRP should be rer	moved from the ADV record	because it was filed in error, such as	due to a cierical or data-entry mistal	ke. Explain the circumstances:		
	If the second se			ado to a otorical of data offity finistal			
В.	the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the						
	-		-		rm ADV, BD or U-4) to the IARD or <i>CRD</i> for the		
	event? If the answer is "Yes	gistered through the IARD sy s," no other information on th	-		rm ADV, BD or U-4) to the IARD or <i>CRD</i> for the		
	-		-		rm ADV, BD or U-4) to the IARD or <i>CRD</i> for the		
	event? If the answer is "Yes		-		rm ADV, BD or U-4) to the IARD or <i>CRD</i> for the		

1.	_	ulatory Action initiated by: EC _C Other Federal
	-	name of regulator, foreign financial regulatory authority, federal, state, or <i>SRO</i>) TE OF NEW HAMPSHIRE, BUREAU OF SECURITIES REGULATION
2.		cipal Sanction:
		and Administrative Penalt(ies) /Fine(s)
		er Sanctions:
	CEA	SE AND DESIST RESTITUTION
3.	Date	Initiated (MM/DD/YYYY):
	08/1	3/2002 [⊙] Exact [©] Explanation
	If no	t exact, provide explanation:
4.	Doc	ket/Case Number:
	CON	/ 102-009
5.	Advi	sory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Princ Othe	cipal Product Type:
		er Product Types:
		TUAL FUND SUB-ACCOUNTS OF VARIABLE ANNUITY.
7.	Des	cribe the allegations related to this regulatory action (your response must fit within the space provided):
	PUT	NAM HARTFORD CAPITAL MANAGER VARIABLE ANNUITY SUB-ACCOUNT MUTUAL FUNDS WERE SOLD TO ONE CLIENT WITHOUT SUFFICIENT SUITABILITY
	ANA	LYSIS, WERE NOT A SUITABLE INVESTMENT, EXPOSED CLIENT TO UNNECESSARY AND UNWANTED HIGH RISK OF LOSS, AND WERE NOT SUITABLE TO MEET
	CLIE	ENT'S NEEDS.
8.	Curr	ent Status? C Pending C On Appeal C Final
9.	If on	appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:
If F	inal oı	r On Appeal, complete all items below. For Pending Actions, complete Item 13 only.
10.	How	was matter resolved:
	Con	sent
11.	Reso	olution Date (MM/DD/YYYY):
	11/0	5/2003 © Exact C Explanation
	If no	t exact, provide explanation:
12.	Res	olution Detail:
	A.	Were any of the following Sanctions Ordered (check all appropriate items)?
		✓ Monetary/Fine Amount: \$ 7,500.00
		☐ Revocation/Expulsion/Denial ☐ Disgorgement/Restitution
		☐ Censure ☐ Cease and Desist/Injunction
		□ Bar □ Suspension
	B.	Other Sanctions Ordered:
		Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion of penalty was waived: ADMINISTRATIVE FINE:\$7,500 - PAID OCTOBER 22, 2003. RESTITUTION: RETURN OF INITIAL INVESTMENT PLUS INTEREST.
13	Prov	ride a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space

PART II

provided).

NOVEMBER 5, 2003 - NEW HAMPSHIRE CONCENT ORDER - \$7500.00. VA SUB-ACCOUNT MUTUAL FUNDS SOLD TO ONE CLIENT: WITHOUT SUFFICIENT SUITABLITY ANALYSIS, WERE NOT A SUITABLE INVESTMENT, EXPOSED CLIENT TO UNNECESSARY AND UNWANTED HIGH RISK OF LOSS, WERE NOT SUITABLE TO MEET THAER INVESTMENT OBJECTIVES

			GENERAL INSTRUC	TIONS	
This	Disclosure Reporting Page (DR	RP ADV) is an 👝 INIT	TAL OR • AMENDED response used to	report details for affirmative resp	onses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
of Fo	orm ADV.				
01	-l. it(-) bi		Regulatory Action	n	
	ck item(s) being responded to:		□ 11.C(3)	T 44 C(4)	T 44 0(5)
	11.C(1)	11.C(2)	* *	11.C(4)	□ 11.C(5)
	11.D(1)	✓ 11.D(2)	□ 11.D(3)	☑ 11.D(4)	□ 11.D(5)
	11.E(1)	11.E(2)	☐ 11.E(3)	□ 11.E(4)	
1 1	11.F.	☐ 11.G.			
Lloo	a concrete DPD for each event	t or propositing. The o	ama ayant ar pragading may be reported	d for more than one nargen or on	tity using one DRD. File with a completed
	cution Page.	of proceeding. The sa	ame event or proceeding may be reported	u foi filore triair one <i>person</i> or en	tity using one DRP. File with a completed
LXOC	oution i ago.				
One	event may result in more than	one affirmative answer	to Items 11.C., 11.D., 11.E., 11.F. or 11.0	G. Use only one DRP to report de	etails related to the same event. If an event gives
rise	to actions by more than one reg	gulator, provide details	for each action on a separate DRP.		
PAR					
A.	The person(s) or entity(ies) for	r whom this DRP is bei	ing filed is (are):		
	You (the advisory firm)				
	C You and one or more of yo	our			
	One or more of your advisor	ory affiliates			
	If this DRP is being filed for an	n <i>advisorv affiliate</i> , give	the full name of the advisory affiliate belo	ow (for individuals, Last name, Fi	rst name. Middle name).
		•	nat number. If not, indicate "non-registered	·	·
	ADV DRP - ADVISORY AFFIL	LIATE			
	CRD <u>16443</u>		This advisory affiliate is • a Firm •	an Individual	
	Number:		•		
	Registered:)			
	Name: INVESTMENT (CENTERS OF			
	AMERICA, INC.				
	(For individuals	s, Last, First, Middle)			
			ord because the advisory affiliate(s) is no I		
					o or (2) the adviser is registered or applying for
	registration with the SEC of	or reporting as an exem	mpt reporting adviser with the SEC and the	e event was resolved in the advis	ser's or <i>advisory affiliate'</i> s favor.
	If you are registered or registe	oring with a atata again	rition outhority, you may remove a DRD to	er an avant you raparted only in ra	concerns to Itam 11 D(4), and only if that event
		-			sponse to Item 11.D(4), and only if that event d in Item 11 that occurred more than ten years
	ago.	ago. Il you are registe	red or registering with the GEO, you may h	remove a Bixi for any event hate	a in term in a race occurred more than term years
	3				
	This DRP should be remove	ved from the ADV reco	ord because it was filed in error, such as d	due to a clerical or data-entry mis	take. Explain the circumstances:
B.	If the advisory affiliate is registe	ered through the IARD	system or CRD system, has the advisor	y affiliate submitted a DRP (with I	Form ADV, BD or U-4) to the IARD or <i>CRD</i> for the
	event? If the answer is "Yes," r	-	-	,	,
	• Yes • No				
	Yes V No				
	NOTE: The completion of this	form does not relieve t	the advisory affiliate of its obligation to upo	date its IARD or <i>CRD</i> records.	
PAR	TII				
1.	Regulatory Action initiated by:		_		
	C SEC Other Federal	State O SRO OF	Foreign		
	(Full name of regulator, foreign	n financial regulatory ε	authority, federal, state, or SRO)		
2.	Principal Sanction:				
	Other Sanctions:				
3.	Date Initiated (MM/DD/YYYY):				

C Exact C Explanation

4.	Docket/Case Number:							
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):							
6.	Principal Product Type:							
	Other Product Types:							
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided):							
8.	Current Status? C Pending C On Appeal C	Final						
9.	If on appeal, regulatory action appealed to (SEC, SRO, I	Federal or State Court) and Date App	peal Filed:					
lf Fi	inal or On Appeal, complete all items below. For Pending	Actions, complete Item 13 only.						
10.	How was matter resolved:							
11.	Resolution Date (MM/DD/YYYY): © Exact © Explanation If not exact, provide explanation:							
12.	Resolution Detail: A. Were any of the following Sanctions <i>Ordered</i> (chec	ck all appropriate items)?						
☐ Monetary/Fine Amount: \$ ☐ Revocation/Expulsion/Denial ☐ Disgorgem ☐ Censure ☐ Cease and			Disgorgement/Restitution Cease and Desist/Injunction Suspension					
13.	Sanction detail: if suspended, enjoined or barred, Principal, etc.). If requalification by exam/retraining condition has been satisfied. If disposition resulted you or an advisory affiliate, date paid and if any position.	was a condition of the sanction, production of the sanction, production as fine, penalty, restitution, disgortion of penalty was waived:	vide length of time given to requalify/ rgement or monetary compensation	retrain, type of exam required and whether, provide total amount, portion levied against				
	provided).							
This	Disclosure Reporting Page (DRP ADV) is an C INITIAL	GENERAL INSTRU		nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.				
	orm ADV.							
		Regulatory Acti	on					
	ck item(s) being responded to:	_		_				
	11.C(1)	□ 11.C(3)	□ 11.C(4)	☐ 11.C(5)				
	11.D(1)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)				
	11.E(1)	□ 11.E(3)	□ 11.E(4)					
	a separate DRP for each event or <i>proceeding</i> . The same	e event or <i>proceeding</i> may be report	ed for more than one <i>person</i> or entit	y using one DRP. File with a completed				
	event may result in more than one affirmative answer to to actions by more than one regulator, provide details for		.G. Use only one DRP to report deta	ils related to the same event. If an event gives				
PAR	T I							

If not exact, provide explanation:

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

You (the advisory firm)

	C You and one or more of your advisory affiliates						
	One or more of your advisory affiliates						
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name). If the <i>advisory affiliate</i> has a <i>CRD</i> number, provide that number. If not, indicate "non-registered" by checking the appropriate box.						
	ADV DRP - ADVISORY AFFILIATE						
	CRD Number: This advisory affiliate is						
	Name: PRUDENTIAL PLC (For individuals, Last, First, Middle)						
	☐ This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. ☐ This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.						
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.						
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:						
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.						
	C Yes • No						
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.						
PAF	RT II						
1.	Regulatory Action initiated by: O SEC Other Federal O State O SRO Foreign						
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) FINANCIAL SERVICES AUTHORITY						
2.	Principal Sanction: Civil and Administrative Penalt(ies) /Fine(s) Other Sanctions:						
3.	Date Initiated (MM/DD/YYYY):						
	02/24/2012 Exact Explanation If not exact, provide explanation:						
4.	Docket/Case Number: ENF WS00181						
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):						
6.	Principal Product Type: No Product Other Product Types:						
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): THE FSA ALLEGED THAT PRUDENTIAL PLC BREACHED LISTING PRINCIPLE 6 BY NOT MORE RAPIDLY INFORMING THE FSA OF THE PROSPECTIVE (AND SUBSEQUENTLY ABORTED) ACQUISITION OF AIA GROUP LIMITED IN EARLY 2010. THE ALLEGATIONS DID NOT INVOLVE ANY ADVISORY ACTIVITIES OR FUNCTIONS, OR ANY PERSON INVOLVED IN SUCH ACTIVITIES OR FUNCTIONS OR THAT HAS A ROLE IN THE MANAGEMENT OR POLICIES OF ANY ADVISOR. ADDITIONAL INFORMATION CONCERNING THE MATTER MAY BE FOUND IN THE REPORT OF PRUDENTIAL PLC ON FORM 6-K FURNISHED TO THE SEC ON MARCH 27, 2013.						
8.	Current Status? C Pending C On Appeal Final						
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:						

10.	How was matter resolved:				
	Decision & Order of Offer of	of Settlement			
11.	Resolution Date (MM/DD/Y	YYY):			
	03/27/2013	Explanation			
	If not exact, provide explana	ation:			
12.	Resolution Detail:				
	A. Were any of the follow	wing Sanctions <i>Ordered</i> (che	eck all appropriate items)?		
	✓ Monetary/Fine Ar	mount: \$ 21,000,000.00			
	Revocation/Expu			☐ Disgorgement/Restitution	
	Censure			☐ Cease and Desist/Injunction	
	□ Bar			☐ Suspension	
	B. Other Sanctions Orde	ered·		,	
	B. Girlor Garlottorio Grac	510d.			
	Principal, etc.). If requestion has been so you or an advisory after TOTAL FINANCIAL P	ualification by exam/retraining atisfied. If disposition resulte filiate, date paid and if any position resulte SNALTIES OF 14 MILLION PRY AFFILIATE EXPECTS THA	g was a condition of the sanction, pred in a fine, penalty, restitution, discontion of penalty was waived: POUNDS STERLING (\$21 MILLION A	ovide length of time given to requalify orgement or monetary compensation AS OF MARCH 27, 2013) WERE LEVII	ecurities Principal, Financial Operations retrain, type of exam required and whether n, provide total amount, portion levied against ED AGAINST PRUDENTIAL PLC. THE PAYS OF THE PUBLICATION OF THE FINAL
13.	Provide a brief summary o provided).	f details related to the action	n status and (or) disposition and inc	ude relevant terms, conditions and d	ates (your response must fit within the space
	DELIBERATE, A BREACH THE SPECIFIED ADVISOR INDEPENDENT DE NOVO	OF LISTING PRINCIPLE 6 H Y AFFILIATE HAS WITHDRA DETERMINATION OF THE N	HAD OCCURRED, AND LEVIED THE AWN AN EARLIER REFERRAL TO T MATTER, AND THE FINAL NOTICE	FINANCIAL PENALTY REFERRED T HE UK UPPER TRIBUNAL (TAX AND ACCORDINGLY REPRESENTS THE	D THAT, ALTHOUGH NEITHER RECKLESS NOR O ABOVE. AS PART OF THE SETTLEMENT, CHANCERY CHAMBER) FOR AN FINAL RESOLUTION OF THE MATTER. I 6-K FURNISHED TO THE SEC ON MARCH 27,
			GENERAL INSTR		
This	Disclosure Reporting Page	(DRP ADV) is an O INITIA	L OR	I to report details for affirmative respo	onses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
of Fo	rm ADV.				
			Regulatory A	etion	
	ck item(s) being responded				_
	1.C(1)	□ 11.C(2)	11.C(3)	□ 11.C(4)	11.C(5)
	1.D(1)	□ 11.D(2)	11.D(3)	□ 11.D(4)	□ 11.D(5)
	1.E(1)	☑ 11.E(2)	□ 11.E(3)	□ 11.E(4)	
□ 1	1.F.	□ 11.G.			
Exec One	eution Page. event may result in more th	an one affirmative answer to			ity using one DRP. File with a completed ails related to the same event. If an event gives
PAR ³	ΤΙ				
) for whom this DRP is being	g filed is (are):		
	You (the advisory firm)				
	C You and one or more of	f your advisory affiliates			
	One or more of your ad				
				pelow (for individuals, Last name, Firstered" by checking the appropriate box	
	ADV DRP - ADVISORY AI	FFII IATF			

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.

	☐ This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. ☐ This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
3.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.
	C Yes C No
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
٩R	TII
	Regulatory Action initiated by: O SEC Other Federal O State SRO O Foreign
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) FINANCIAL INDUSTRY REGULATORY AUTHORITY
	Principal Sanction: Civil and Administrative Penalt(ies) /Fine(s) Other Sanctions:
	CENSURE; DISGORGEMENT/RESTITUTION
3.	Date Initiated (MM/DD/YYYY):
	04/28/2016 © Exact © Explanation If not exact, provide explanation:
	Docket/Case Number: NO. 2014041838301
i.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable): N/A
3.	Principal Product Type: Unit Investment Trust(s) Other Product Types:
·.	Describe the allegations related to this regulatory action (your response must fit within the space provided): WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO IDENTIFY AND APPLY SALES CHARGE DISCOUNTS TO CERTAIN CUSTOMERS' ELIGIBLE PURCHASES OF UNIT INVESTMENT TRUSTS (UITS). THE FINDINGS STATED THAT SPECIFICALLY, THE FIRM FAILED TO APPLY SALES CHARGE DISCOUNTS TO 2, 809 ELIGIBLE UIT PURCHASES RESULTING IN CUSTOMERS PAYING EXCESSIVE SALES CHARGES OF APPROXIMATELY \$398,401.30. THE FIRM HAS PAID RESTITUTION TO ALL AFFECTED CUSTOMERS. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN AND ENFORCE A SUPERVISORY SYSTEM AND WRITTEN SUPERVISORY PROCEDURES REASONABLY DESIGNED TO ENSURE THAT CUSTOMERS RECEIVED SALES CHARGE DISCOUNTS ON ALL ELIGIBLE UIT PURCHASES. THE FIRM RELIED PRIMARILY ON ITS REGISTERED REPRESENTATIVES TO ENSURE THAT CUSTOMERS RECEIVED APPROPRIATE UIT SALES CHARGE DISCOUNTS, DESPITE THE FACT THAT THE FIRM DID NOT EFFECTIVELY INFORM AND TRAIN REPRESENTATIVES AND THEIR SUPERVISORS TO IDENTIFY AND APPLY SUCH SALES CHARGE DISCOUNTS.
3.	Current Status? C Pending C On Appeal Final
).	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed: N/A
Fi	inal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.
0.	How was matter resolved:
٠.	Acceptance, Waiver & Consent(AWC)

11. Resolution Date (MM/DD/YYYY):

		8/2016 © Exact © Exect, provide explanation	•					
12	Reso	lution Detail:						
			g Sanctions <i>Ordered</i> (ch	eck all appropriate items)?				
	, u		e any of the following Sanctions <i>Ordered</i> (check all appropriate items)? Monetary/Fine Amount: \$ 175,000.00					
		Revocation/Expulsion			☑ Disgorgement/Restitution			
		☑ Censure			☐ Cease and Desist/Injunction			
		☐ Bar			☐ Suspension			
	B.	Other Sanctions Ordere	d:					
		Principal, etc.). If requali condition has been satis you or an advisory affilia THE FIRM WAS CENSU	nded, enjoined or barred fication by exam/retraining fied. If disposition result te, date paid and if any p RED, FINED \$175,000 (I	ng was a condition of the sanction, ed in a fine, penalty, restitution, disportion of penalty was waived:	provide length of time given to requalify/sgorgement or monetary compensation. PAY \$398,401.30 PLUS INTEREST TOTAL	ecurities Principal, Financial Operations retrain, type of exam required and whether provide total amount, portion levied against ALING \$45,799.19. THE FIRM HAS PAID		
	Provi provi	-	etails related to the actio	n status and (or) disposition and in	nclude relevant terms, conditions and da	ites (your response must fit within the space		
					THAT EXPLAINS HOW THE FIRM HAS E FIRM'S POLICIES AND PROCEDURE:			
Th:- I	مامماد	ours Deposition Desc (D	DD ADVV is an INITU	GENERAL INST				
			RP ADV) is an O INITIA	OR AMENDED response us	ed to report details for affirmative respon	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.		
of Fo	m AL	V.						
				Regulatory	Action			
		n(s) being responded to:		-	5 44.0(0)	-		
	1.C(1) 1.D(1)		☐ 11.C(2) ☑ 11.D(2)	☐ 11.C(3) ☐ 11.D(3)	□ 11.C(4) ⊡ 11.D(4)	□ 11.C(5) □ 11.D(5)		
	1.E(1)		11.E(2)	☐ 11.E(3)	□ 11.E(4)	L 11.D(5)		
<u> </u>	, ,	'	□ 11.G.	E 11.E(0)	□ 11.∟(₹)			
Execi One (ution l	Page. may result in more than	one affirmative answer t		-	y using one DRP. File with a completed ils related to the same event. If an event gives		
PART								
A.	-	person(s) or entity(ies) foou (the advisory firm)	r whom this DRP is bein	g filed is (are):				
	o Y	ou and one or more of yo	our advisory affiliates					
		ne or more of your <i>advis</i>						
		J	, ,		e below (for individuals, Last name, Firs stered" by checking the appropriate box.	,		
	ADV	DRP - ADVISORY AFFI	LIATE					
				No Informa	ation Filed			
	ПТ	his DRP should be remo	ved from the ADV record	d because: (1) the event or procee	s no longer associated with the adviser ding occurred more than ten years ago on the event was resolved in the advise	or (2) the adviser is registered or applying for		
	-	-	~			oonse to Item 11.D(4), and only if that event in Item 11 that occurred more than ten years		
	ПΤ	his DRP should be remo	ved from the ADV record	d because it was filed in error, suc	n as due to a clerical or data-entry mista	ke. Explain the circumstances:		

Б.	event? If the answer is "Yes," no other information on this DRP must be provided.	tri
	O Yes O No	
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.	
'AR'	RT II	
1.	Regulatory Action initiated by:	
	C SEC C Other Federal	
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) MASSACHUSETTS SECURITIES DIVISION	
2.	Principal Sanction:	
	Cease and Desist	
	Other Sanctions: CENSURE, ADMINISTRATIVE FINE, REVIEW OF WRITTEN SUPERVISORY POLICIES AND PROCEDURES WITH RESPECT TO PROXY VOTING	
3.	Date Initiated (MM/DD/YYYY):	
	06/22/2016 © Exact C Explanation	
	If not exact, provide explanation:	
4.		
	E-2016-0020	
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable): N/A	
6.	Principal Product Type:	
	Other Other Product Types:	
	NONE	
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): THE DIVISION ALLEGED THAT ONE INVEST FINANCIAL CORPORATION REPRESENTATIVE SUBMITTED UNAUTHORIZED PROXY VOTES ON BEHALF OF CLIENTS IN VIOLATION OF THE FIRM'S WSPS.	
8.	Current Status? C Pending C On Appeal Final	
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:	
	N/A	
lf Fi	inal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.	
10.	How was matter resolved:	
	Order	
11.	Resolution Date (MM/DD/YYYY):	
	06/22/2016 Exact Explanation	
	If not exact, provide explanation:	
12.	Resolution Detail:	
	A. Were any of the following Sanctions Ordered (check all appropriate items)?	
	Monetary/Fine Amount: \$ 25,000.00	
	Revocation/Expulsion/Denial Disgorgement/Restitution	
	▼ Cease and Desist/Injunction	
	☐ Bar ☐ Suspension	
	B. Other Sanctions Ordered:	
	INVEST FINANCIAL CORPORATION WILL REVIEW ITS WRITTEN SUPERVISORY POLICIES AND PROCEDURES WITH RESPECT TO PROXY VOTING. Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations	
	Principal etc.) If regulalification by exam/retraining was a condition of the sanction, provide length of time given to regulalify/retrain, type of exam required and whether	

condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an *advisory affiliate*, date paid and if any portion of penalty was waived:

	\$25,000 ADMINISTRATIVE FINE PAID JUNE 23, 2016				
13.	13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided). WITHIN 60 DAYS OF THE SIGNED ORDER, THE FIRM SHALL REVIEW ITS WRITTEN SUPERVISORY POLICIES AND PROCEDURE WITH RESPECT TO BROKER-DEALER AGENT PROXY VOTING, SPECIFICALLY INCLUDING A REVIEW OF THE EDUCATION AND TRAINING PROVIDED ON PROXY VOTING POLICIES AND PROCEDURES AND ANNUAL CERTIFICATION FOR REGISTERED REPRESENTATIVES. THE FIRM SHALL PROVIDE A REPORT OF ITS CONCLUSIONS AND RECOMMENDATIONS TO THE				
			20 DAYS OF THE ENTRY OF THE ORD ANGES AND/OR ENHANCEMENTS TO		AFTER PROVIDE A CERTIFICATION THAT THE
	FIRM HAS IMPLEMENTED O	R WILL IMPLEMENT CHA	ANGES AND/OR ENHANCEMENTS TO	TTS POLICIES AND PROCEDURE	5.
			GENERAL INSTRUC	TIONS	
This	Disclosure Reporting Page (D	DRP ADV) is an 👝 INITIA			nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
	orm ADV.				
			Regulatory Acti	on	
	ck item(s) being responded to		T 44 C/2\	T 11 C(4)	T 44 C(5)
	11.C(1) 11.D(1)	□ 11.C(2)	☐ 11.C(3) ☐ 11.D(3)	□ 11.C(4) □ 11.D(4)	☐ 11.C(5) ☐ 11.D(5)
	* /	11.D(2)	* *		L 11.D(5)
	11.E(1) 11.F.	☑ 11.E(2) ☐ 11.G.	□ 11.E(3)	□ 11.E(4)	
	П.Г.	LITI.G.			
	•	nt or <i>proceeding</i> . The sar	me event or <i>proceeding</i> may be report	ed for more than one <i>person</i> or enti	ty using one DRP. File with a completed
Exec	cution Page.				
	•		o Items 11.C., 11.D., 11.E., 11.F. or 11 or each action on a separate DRP.	.G. Use only one DRP to report deta	ails related to the same event. If an event gives
PAR	TI				
	The <i>person(s)</i> or entity(ies) for	or whom this DPP is boin	a filed is (are):		
Α.	You (the advisory firm)	DI WITOTTI UTIS DICE IS DETIT	g lileu is (ale).		
	~				
	C You and one or more of you				
	One or more of your advis	sory affiliates			
	•	•	the full name of the <i>advisory affiliate</i> be at number. If not, indicate "non-register	•	•
	ADV DRP - ADVISORY AFF	II IATE			
	- ADVIOUNT AIT				
			No Information	n Filed	
	This DPP should be remo	oved from the ADV record	d because the <i>advisory affiliate(s)</i> is no	Jonger associated with the adviser	
	This DRP should be remo	oved from the ADV record		occurred more than ten years ago	or (2) the adviser is registered or applying for
					ponse to Item 11.D(4), and only if that event in Item 11 that occurred more than ten years
	☐ This DRP should be remo	oved from the ADV record	d because it was filed in error, such as	due to a clerical or data-entry mista	ake. Explain the circumstances:
B.	If the advisory affiliate is regis event? If the answer is "Yes,"	ū	•	ory affiliate submitted a DRP (with Fe	orm ADV, BD or U-4) to the IARD or <i>CRD</i> for the
	O Yes O No				
	NOTE: The completion of this	s form does not relieve the	e <i>advisory affiliate</i> of its obligation to u	pdate its IARD or <i>CRD</i> records.	
PAR	ΤII				
1.	Regulatory Action initiated by SEC Other Federal		preign		
			uthority, federal, state, or SRO)		
	,	-,a. roidi rogululoi y du	,,		

FINANCIAL INDUSTRY REGULATORY AUTHORITY

2. Principal Sanction:

	Other Sanctions: CENSURE DISGORGEMENT RESTITUTION					
3.	. Date Initiated (MM/DD/YYYY):					
	02/22/2017 © Exact © Explanation If not exact, provide explanation:					
4.	. Docket/Case Number: NO. 2015046036301					
5.	. Advisory Affiliate Employing Firm when activity occurred which led to the regressiva	ulatory action (if applicable):				
6.	. Principal Product Type: Mutual Fund(s) Other Product Types:					
7.	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTER RETIREMENT PLAN AND CHARITABLE ORGANIZATION CUSTOMERS THAT FRONT-END SALES CHARGE. THE FINDINGS STATED THAT THESE ELIGICHARGE, OR CLASS B OR C SHARES WITH BACK-END SALES CHARGES CUSTOMERS BY CAUSING SUCH CUSTOMERS TO PAY HIGHER FEES THE FAILED TO REASONABLY SUPERVISE THE APPLICATION OF SALES-CHARGE WAIVEOUS TO DETERMINE THE APPLICABILITY OF SALES-CHARGE WAIVE FINANCIAL ADVISORS IN MAKING THIS DETERMINATION. IN ADDITION, THE AVAILABILITY OF MUTUAL FUND SALES-CHARGE WAIVERS FOR ELIGICATION.	Describe the allegations related to this regulatory action (your response must fit within the space provided): WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT DISADVANTAGED CERTAIN RETIREMENT PLAN AND CHARITABLE ORGANIZATION CUSTOMERS THAT WERE ELIGIBLE TO PURCHASE CLASS A SHARES IN CERTAIN MUTUAL FUNDS WITHOUT A FRONT-END SALES CHARGE. THE FINDINGS STATED THAT THESE ELIGIBLE CUSTOMERS WERE INSTEAD SOLD CLASS A SHARES WITH A FRONT-END SALES CHARGE, OR CLASS B OR C SHARES WITH BACK-END SALES CHARGES AND HIGHER ONGOING FEES AND EXPENSES. THESE SALES DISADVANTAGES ELIGIBLE CUSTOMERS BY CAUSING SUCH CUSTOMERS TO PAY HIGHER FEES THAN THEY WERE ACTUALLY REQUIRED TO PAY. THE FINDINGS ALSO STATE THAT THE FIRM FAILED TO REASONABLY SUPERVISE THE APPLICATION OF SALES-CHARGE WAIVERS TO ELIGIBLE MUTUAL FUND SALES. THE FIRM RELIED ON ITS FINANCIAL ADVISORS TO DETERMINE THE APPLICABILITY OF SALES-CHARGE WAIVERS, BUT FAILED TO MAINTAIN ADEQUATE WRITTEN POLICIES OR PROCEDURES TO ASSIST FINANCIAL ADVISORS IN MAKING THIS DETERMINATION. IN ADDITION, THE FIRM FAILED TO ADEQUATELY NOTIFY AND TRAIN ITS FINANCIAL ADVISORS REGARDING THE AVAILABILITY OF MUTUAL FUND SALES-CHARGE WAIVERS FOR ELIGIBLE CUSTOMERS. THE FIRM ALSO FAILED TO ADOPT ADEQUATE CONTROLS TO DETECT INSTANCES IN WHICH THEY DID NOT PROVIDE SALES-CHARGE WAIVERS TO ELIGIBLE CUSTOMERS IN CONNECTION WITH THEIR MUTUAL FUND PURCHASES.				
8.	. Current Status? C Pending C On Appeal Final					
9.	. If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Cou N/A	rt) and Date Appeal Filed:				
lf Fi	Final or On Appeal, complete all items below. For Pending Actions, complete Ite	em 13 only.				
10.	How was matter resolved:					
	Acceptance, Waiver & Consent(AWC)					
11.	Resolution Date (MM/DD/YYYY):					
	02/22/2017 © Exact C Explanation					
	If not exact, provide explanation:					
12.	2. Resolution Detail:					
	A. Were any of the following Sanctions Ordered (check all appropriate iter	ms)?				
	✓ Monetary/Fine Amount: \$ 225,000.00					
	Revocation/Expulsion/Denial	✓ Disgorgement/Restitution				
	☑ Censure	☐ Cease and Desist/Injunction				
	☐ Bar	☐ Suspension				
	Principal, etc.). If requalification by exam/retraining was a condition of the condition has been satisfied. If disposition resulted in a fine, penalty, revision or an advisory affiliate, date paid and if any portion of penalty was with the FIRM WAS CENSURED, FINED \$225,000, AND ORDERED TO PREOR, BUT DID NOT RECEIVE THE APPLICABLE MUTUAL FUND SALE OVERCHARGED BY APPROXIMATELY \$442,574 FOR MUTUAL FUND	luding start date and capacities affected (General Securities Principal, Financial Operations he sanction, provide length of time given to requalify/retrain, type of exam required and whether estitution, disgorgement or monetary compensation, provide total amount, portion levied against waived: ROVIDE REMEDIATION TO ELIGIBLE CUSTOMERS WHO, FROM JANUARY 1, 2009, QUALIFIED ES- CHARGE WAIVERS. THE FIRM ESTIMATES THAT ITS ELIGIBLE CUSTOMERS WERE PURCHASES SINCE JANUARY 1, 2009. THE FIRM HAS PAID RESTITUTION TO ELIGIBLE HOUNT ELIGIBLE CUSTOMERS WERE OVERCHARGED, INCLUSIVE OF INTEREST).				

THE FIRM PROMPTLY ESTABLISHED A PLAN OF REMEDIATION FOR ELIGIBLE CUSTOMERS WHO DID NOT RECEIVE APPROPRIATE SALES CHARGE WAIVERS AND

13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space

WERE OVER		NOL OF THE WISCONDOOT. THE FI	NIVITIAGI AID NEGITIOTION FEOGI	MIEREST TO ELIGIBLE COSTOMERS WITO		
I.						
		GENERAL INSTRU				
This Disclosure Re	porting Page (DRP ADV) is an 🁝 INITIA	L OR	to report details for affirmative respo	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G		
of Form ADV.						
		Regulatory Ac	tion			
Check item(s) bein	g responded to:	,				
□ 11.C(1)	☐ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)		
□ 11.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)		
□ 11.E(1)	☑ 11.E(2)	☐ 11.E(3)	□ 11.E(4)			
□ 11.F.	□ 11.G.					
Execution Page.	P for each event or <i>proceeding</i> . The san		·	ty using one DRP. File with a completed ails related to the same event. If an event gives		
rise to actions by m	ore than one regulator, provide details fo	or each action on a separate DRP.				
PART I						
	or entity(ies) for whom this DRP is being	g filed is (are):				
C You (the a	dvisory firm)					
C You and o	ne or more of your advisory affiliates					
	ore of your advisory affiliates					
~	auvisory armiates					
	being filed for an <i>advisory affiliate</i> , give the affiliate has a <i>CRD</i> number, provide that	_	•	•		
ADV DRP - A	DVISORY AFFILIATE					
CRD 16443 This advisory affiliate is						
Registered:	Registered: • Yes O No					
Name:	INVESTMENT CENTERS OF					
	AMERICA, INC.					
	(For individuals, Last, First, Middle)					
☐ This DRP registratio	☐ This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. ☐ This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the adviser's or <i>advisory affiliate</i> 's favor. If you are registered or registering with a <i>state securities authority</i> , you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event					
ago.				in Item 11 that occurred more than ten years		
☐ This DRP	should be removed from the ADV record	I because it was filed in error, such a	s due to a clerical or data-entry mista	lke. Explain the circumstances:		
_	affiliate is registered through the IARD sanswer is "Yes," no other information on the sanswer is "Yes," and other information on the sanswer is "Yes," no other information of the sanswer is "Yes," no other information on the sanswer is "Yes," no other information of the sanswer is "Yes," no other	•	sory affiliate submitted a DRP (with Fo	orm ADV, BD or U-4) to the IARD or <i>CRD</i> for the		
⊙ Yes O	No					
NOTE: The co	ompletion of this form does not relieve the	e advisory affiliate of its obligation to	update its IARD or <i>CRD</i> records.			
PART II						
	ction initiated by: Other Federal O State O SRO O Fol	reign				
(Full name of	regulator, foreign financial regulatory aut	thority, federal, state, or SRO)				
2. Principal Sand						
Other Sanctio	ns:					

3.	Date Initiated (MM/DD/YYYY):				
	C Exact C Explanation				
	If not exact, provide explanati	on:			
4.	Docket/Case Number:				
5.	Advisory Affiliate Employing I	Firm when activity occur	red which led to the regulatory action	(if applicable):	
6.	Principal Product Type:				
	Other Product Types:				
7.	Describe the allegations rela	ted to this regulatory ac	tion (your response must fit within th	e space provided):	
8.	Current Status? C Pend	ling On Appeal	C Final		
		5 11 11			
9.	If on appeal, regulatory action	n appealed to (SEC. <i>SR</i>	O, Federal or State Court) and Date A	Appeal Filed:	
	,,,,,	(, -	,		
If Ei	inal or On Annoal, complete al	Il itams balaw Far Band	ing Actions, complete Item 13 only.		
	iliai di Oli Appeai, complete ai	iriterns below. For Fend	ing Actions, complete item 13 only.		
10	How was matter resolved:				
10.	now was matter resolved.				
11	Resolution Date (MM/DD/YYY	/V)·			
11.		1).			
	C Exact C Explanation				
	If not exact, provide explanati	on:			
12.	Resolution Detail:				
	A. Were any of the following	ng Sanctions Ordered (c	heck all appropriate items)?		
	☐ Monetary/Fine Amo	ount: \$			
	Revocation/Expuls	ion/Denial		☐ Disgorgement/Restitution	
	Censure			☐ Cease and Desist/Injunction	
	☐ Bar			☐ Suspension	
	B. Other Sanctions Ordere	ed:		·	
	Sanction detail: if suspe	ended, <i>enjoined</i> or barre	ed, provide duration including start da	ate and capacities affected (General	Securities Principal, Financial Operations
					lify/retrain, type of exam required and whether
		· ·	of portion of penalty, restitution, dis	gorgement or monetary compensati	ion, provide total amount, portion levied against
	you of all advisory airille	ate, date paid and it any	portion of penalty was waived.		
40	B : 1 : 1 : 1			l l l e	
13.	provided).	letails related to the acti	on status and (or) disposition and in-	clude relevant terms, conditions and	dates (your response must fit within the space
	promaca).				
			GENERAL INSTR		
		DRP ADV) is an 👩 INIT	OR AMENDED response use	d to report details for affirmative res	sponses to Items 11.C., 11.D., 11.E., 11.F. or 11.C
of Fo	orm ADV.				
			Regulatory A	action	
Chec	ck item(s) being responded to):	. logulatory /		
□ 1	11.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
V 1	11.D(1)	☑ 11.D(2)	□ 11.D(3)	☑ 11.D(4)	☑ 11.D(5)
□ 1	11.E(1)	□ 11.E(2)	□ 11.E(3)	□ 11.E(4)	
□ 1	11.F.	□ 11.G.			
	•	nt or <i>proceeding</i> . The sa	ame event or <i>proceeding</i> may be rep	orted for more than one <i>person</i> or e	entity using one DRP. File with a completed
LYGO	cution Page.				

One event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the same event. If an event gives rise to actions by more than one regulator, provide details for each action on a separate DRP.

PAF	RTI
A.	The <i>person(s)</i> or entity(ies) for whom this DRP is being filed is (are): Output Output Description:
	C You and one or more of your advisory affiliates
	One or more of your advisory affiliates
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name). If the <i>advisory affiliate</i> has a <i>CRD</i> number, provide that number. If not, indicate "non-registered" by checking the appropriate box.
	ADV DRP - ADVISORY AFFILIATE
	CRD 16443 Number: This advisory affiliate is • a Firm • an Individual
	Registered: • Yes O No
	Name: INVESTMENT CENTERS OF AMERICA, INC.
	(For individuals, Last, First, Middle)
	☐ This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. ☐ This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.
	• Yes O No
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
PAF	RT II
1.	Regulatory Action initiated by: C SEC Other Federal C State C SRO C Foreign
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO)
2.	Principal Sanction:
	Other Sanctions:
3.	Date Initiated (MM/DD/YYYY):
	C Exact C Explanation If not exact, provide explanation:
4.	Docket/Case Number:
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Principal Product Type:
	Other Product Types:
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided):
8.	Current Status? C Pending C On Appeal C Final
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.

10. How wa	as matter resolved:			
11. Resolut	tion Date (MM/DD/YYYY):			
O Ex	act C Explanation			
If not ex	xact, provide explanation:			
12. Resolu	tion Detail:			
A. W	/ere any of the following Sanctions Ordered (ch	neck all appropriate items)?		
_	Monetary/Fine Amount: \$,		
	Revocation/Expulsion/Denial	г	Disgorgement/Restitution	
_	Censure		Cease and Desist/Injunction	
	Bar		Suspension	
	ther Sanctions <i>Ordered:</i>	_	Cuoponoion	
P cc yc	anction detail: if suspended, enjoined or barre rincipal, etc.). If requalification by exam/retraini andition has been satisfied. If disposition result ou or an advisory affiliate, date paid and if any part of a brief summary of details related to the action and it.	ng was a condition of the sanction, provided in a fine, penalty, restitution, disgor portion of penalty was waived:	ide length of time given to requalify, gement or monetary compensation	retrain, type of exam required and whether , provide total amount, portion levied against
This Dissland	ture Penerting Page (DPR ADV) is an an INITI	GENERAL INSTRUC		nage to Itoma 11 C 11 D 11 E 11 E or 11 C
		OR C AMENDED response used to	report details for animative respo	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
of Form ADV				
		Regulatory Action	on	
Check item(s	s) being responded to:			
11.C(1)	☐ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
□ 11.D(1)	☑ 11.D(2)	□ 11.D(3)	☑ 11.D(4)	□ 11.D(5)
□ 11.E(1)	□ 11.E(2)	□ 11.E(3)	□ 11.E(4)	
□ 11.F.	☐ 11.G.			
Execution Pa		to Items 11.C., 11.D., 11.E., 11.F. or 11		ty using one DRP. File with a completed ails related to the same event. If an event gives
PART I				
-	rson(s) or entity(ies) for whom this DRP is being (the advisory firm)	ng filed is (are):		
O You	u and one or more of your advisory affiliates			
	e or more of your advisory affiliates			
	ORP is being filed for an <i>advisory affiliate</i> , give dvisory affiliate has a CRD number, provide that		•	•
ADV D	RP - ADVISORY AFFILIATE			
CRD		This advisor water to G. E. C.		
Numb	per:	This advisory affiliate is 💿 a Firm 🔘	an individual	
Regis	stered: O Yes O No			
Name				
Ivanie	INSURANCE COMPANY ("JNL")			
	(For individuals, Last, First, Middle)			
	,			
	s DRP should be removed from the ADV recors S DRP should be removed from the ADV recor			

registration with the SEC or reporting as an exempt reporting adviser with the SEC and the event was resolved in the adviser's or advisory affiliate's favor.

	occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.				
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:				
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.				
	○ Yes • No				
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.				
PAR	RT II				
1.	Regulatory Action initiated by: O SEC Other Federal State O SRO O Foreign				
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) STATE OF NEVADA DEPARTMENT OF BUSINESS AND INDUSTRY DIVISION OF INSURANCE				
2.	Principal Sanction: Civil and Administrative Penalt(ies) /Fine(s) Other Sanctions:				
3.	Date Initiated (MM/DD/YYYY):				
	11/01/2005				
4.	Docket/Case Number: 05.967				
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):				
6.	Principal Product Type: No Product Other Product Types:				
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): JACKSON NATIONAL LIFE INSURANCE COMPANY FAILED TO FILE ITS ANNUAL CERTIFICATION OF ADVERTISEMENT REPORT BY THE DUE DATE OF DECEMBER 31, 2004.				
8.	Current Status? Pending On Appeal Final				
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:				
If F	Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.				
10.	. How was matter resolved: Consent				
11.	. Resolution Date (MM/DD/YYYY):				
	11/11/2005 © Exact © Explanation If not exact, provide explanation:				
12	. Resolution Detail:				
	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)?				
	Monetary/Fine Amount: \$ 500.00				
	☐ Revocation/Expulsion/Denial ☐ Disgorgement/Restitution				
	Censure Cease and Desist/Injunction				
	☐ Bar ☐ Suspension				
	B. Other Sanctions <i>Ordered:</i> NONE Sanction datail: if suspended, opinion or barred, provide duration including start data and capacities affected (Congral Securities Principal, Financial Operations				
	Sanction detail: if suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations				

condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an advisory affiliate, date paid and if any portion of penalty was waived: FINE \$500.00 PAID NOVEMBER 11, 2005. 13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided). JACKSON NATIONAL LIFE INSURANCE COMPANY CONSENTED TO THE PAYMENT OF A \$500.00 FINE IN SETTLEMENT OF THIS ADMINISTRATIVE PROCEEDING. GENERAL INSTRUCTIONS This Disclosure Reporting Page (DRP ADV) is an . INITIAL OR O AMENDED response used to report details for affirmative responses to Items 11.C., 11.D., 11.E., 11.F. or 11.G. of Form ADV. Regulatory Action Check item(s) being responded to: 11.C(3) 11.C(4) 11.C(5) 11.C(1) 11.C(2) 11.D(3) 11.D(1) 11.D(2) 11.D(4) 11.D(5) 11.E(1) **☑** 11.E(2) 11.E(3) 11.E(4) 11.F. 11.G. Use a separate DRP for each event or proceeding. The same event or proceeding may be reported for more than one person or entity using one DRP. File with a completed Execution Page. One event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the same event. If an event gives rise to actions by more than one regulator, provide details for each action on a separate DRP. PART I A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are): You (the advisory firm) • You and one or more of your advisory affiliates One or more of your advisory affiliates If this DRP is being filed for an advisory affiliate, give the full name of the advisory affiliate below (for individuals, Last name, First name, Middle name). If the advisory affiliate has a CRD number, provide that number. If not, indicate "non-registered" by checking the appropriate box. ADV DRP - ADVISORY AFFILIATE CRD 29604 This advisory affiliate is • a Firm • an Individual Number: Registered: NATIONAL PLANNING Name: **CORPORATION** (For individuals, Last, First, Middle) CRD Number: 2225 This advisory affiliate is • a Firm • an Individual Registered: Yes ○ No SII INVESTMENTS, INC. Name: (For individuals, Last, First, Middle) CRD 16443 This advisory affiliate is • a Firm • an Individual Number: INVESTMENT CENTERS OF Name: AMERICA, INC. (For individuals, Last, First, Middle) This DRP should be removed from the ADV record because the advisory affiliate(s) is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an exempt reporting adviser with the SEC and the event was resolved in the adviser's or advisory affiliate's favor. If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years

Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether

	ago.			
	☐ This DRP should be removed from the ADV record because it was filed in error, such	as due to a clerical or data-entry mistake. Explain the circumstances:		
B.	If the <i>advisory affiliate</i> is registered through the IARD system or <i>CRD</i> system, has the <i>adv</i> event? If the answer is "Yes," no other information on this DRP must be provided.	isory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the		
	⊙ Yes C No			
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to	update its IARD or <i>CRD</i> records.		
PAR	T II			
1.	Regulatory Action initiated by: O SEC Other Federal O State SRO O Foreign			
	(Full name of regulator, <i>foreign financial regulatory authority</i> , federal, state, or <i>SRO</i>) NASD			
2.	Principal Sanction: Civil and Administrative Penalt(ies) /Fine(s) Other Sanctions: CENSURE			
3.	Date Initiated (MM/DD/YYYY):			
	09/23/2005			
4.	Docket/Case Number: EAF 0400780002			
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action N/A	(if applicable):		
6.	Principal Product Type: Mutual Fund(s) Other Product Types:			
7.	Describe the allegations related to this regulatory action (your response must fit within the BETWEEN JANUARY 2001 AND DECEMBER 2003, RESPONDENT FIRM AND OTHER BE SPACE (OR REVENUE SHARING) PROGRAMS (THE "PREMIER SPONSOR PROGRAM") COMPLEXES RECEIVED PREFERENTIAL TREATMENT FROM THE FIRMS IN THE MARK FORCE. PARTICIPANTS IN THE PROGRAM PAID SOME OR ALL OF THEIR FEES FOR PAIN MUTUAL FUND PORTFOLIO BROKERAGE COMMISSIONS THROUGH TWO CLEARING FUND COMPLEXES. NASD CONDUCT RULES 2830(K) AND 2110.	ROKER-DEALER AFFILIATES (COLLECTIVELY, THE "FIRMS") MAINTAINED SHELF PURSUANT TO WHICH, IN RETURN FOR A FEE, PARTICIPATING MUTUAL FUND SETING OF FUNDS AND IN ACCESS TO THE FIRMS' RETAIL BROKERAGE SALES ARTICIPATING IN THE PROGRAM BY DIRECTING APPROXIMATELY \$12.54 MILLION		
8.	Current Status? C Pending C On Appeal Final			
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date A N/A	ppeal Filed:		
lf Fi	nal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.			
10.	How was matter resolved: Acceptance, Waiver & Consent(AWC)			
11.	Resolution Date (MM/DD/YYYY):			
	09/23/2005			
	If not exact, provide explanation:			
12	Resolution Detail:			
14.	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)?			
	Monetary/Fine Amount: \$ 1,520,000.00			
	Revocation/Expulsion/Denial	☐ Disgorgement/Restitution		
	✓ Censure	☐ Cease and Desist/Injunction		

		☐ Bar		Suspension		
	B.	Other Sanctions Ordered:				
		N/A				
Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, t						
			•		, provide total amount, portion levied against	
		you or an advisory affiliate, date paid and if				
		\$1,520,000.00 PAID OCTOBER 3, 2005				
13.	Prov	vide a brief summary of details related to the	e action status and (or) disposition and incl	ude relevant terms, conditions and da	ates (your response must fit within the space	
	-	ided).				
				ATIONS OR FINDINGS TO A VIOLATI	ON OF NASD CONDUCT RULES 2830(K) AND	
	2110) AND CONSENTS TO A CENSURE AND FI	INE OF \$1,520,000.00			
			GENERAL INSTRU			
This	Discl	osure Reporting Page (DRP ADV) is an .	INITIAL OR AMENDED response used	to report details for affirmative respo	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.	
of Fo	orm A[DV.				
			Regulatory Ac	ction		
		m(s) being responded to:				
	1.C(1	1)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)	
\Box 1	1.D(1	1) I 11.D(2)	□ 11.D(3)	☑ 11.D(4)	□ 11.D(5)	
	1.E(1	□ 11.E(2)	□ 11.E(3)	11.E(4)		
	1.F.	☐ 11.G.				
	-	parate DRP for each event or <i>proceeding</i> . The	The same event or <i>proceeding</i> may be repo	rted for more than one <i>person</i> or enti	ty using one DRP. File with a completed	
Exec	cution	Page.				
Ono	ovoni	t may recult in more than one offirmative and	ower to Items 11 C 11 D 11 E 11 E or 1	11 C. Llag anly and DPD to report date	ails related to the same event. If an event gives	
		ions by more than one regulator, provide def		T.G. Ose only one DRF to report deta	ans related to the same event. If an event gives	
1100	to dot	iono by more than one regulator, previde del	nailo for odori dollori ofi a doparate Divi :			
PAR	ΤI					
A.	The	person(s) or entity(ies) for whom this DRP is	s being filed is (are):			
	~ Y	You (the advisory firm)				
	O Y	ou and one or more of your advisory affiliate	es			
	0 0	One or more of your advisory affiliates				
		,				
	If this	s DRP is being filed for an advisory affiliate,	give the full pame of the advisory affiliate h	polow (for individuals I act name Fire	et nama Middle nama)	
		e advisory affiliate has a <i>CRD</i> number, provic	-		•	
	The device of a manager has a crist flamber, previde that manager in the deprepriate sext					
	ADV DRP - ADVISORY AFFILIATE					
			No Information	on Filed		
	_					
		This DRP should be removed from the ADV \circ				
					or (2) the adviser is registered or applying for	
	r	registration with the SEC or reporting as an ϵ	exempt reporting adviser with the SEC and	I the event was resolved in the advise	er's or <i>advisory affiliate's</i> favor.	
	16			Manager and the second and the second	and the second AA D/A) and anh if the terror to	
	-	ou are registered or registering with a <i>state</i> so			in Item 11.D(4), and only if that event	
			gistered of registering with the SEC, you in	ay remove a DRP for any event listed	in item 11 that occurred more than ten years	
	ago.	•				
	П	This DRP should be removed from the ADV	record because it was filed in error, such a	us due to a clerical or data-entry mista	ake. Explain the circumstances:	
			Toosia boodado k wao moa m onor, cuon o	io ado to a diorioal or data only imote	and Explain the oneumotaneous	
ь	16 41	and vice we office to be received the county that I	ABB system or CBB system has the additional	o and affiliate out maisted a DDD (with E	ADV DD avil 4) to the IADD av CDD for the	
B.		e <i>advisory amiliate</i> is registered through the <i>in</i> it? If the answer is "Yes," no other informatio	-	sory affiliate submitted a DRP (with Fo	orm ADV, BD or U-4) to the IARD or <i>CRD</i> for the	
	even	it! If the answer is fes, no other information	on this DRF must be provided.			
	0	Yes C No				
	NOT	E: The completion of this form does not relie	eve the advisory affiliate of its obligation to	update its IARD or CRD records.		
			· · · · · · · · · · · · · · · · · · ·			
PAR	ΤII					
1.	Regi	ulatory Action initiated by:				
	o ^s	SEC C Other Federal State C SRO	C Foreign			

	STA	TATE OF FLORIDA, OFFICE OF FINANCIAL REGULATION	
2.	Civil	incipal Sanction: vil and Administrative Penalt(ies) /Fine(s) her Sanctions:	
		RM AGREES TO CEASE AND DESIST FROM ANY AND ALL FUTURE VIOLATIONS.	
3.	Date	ate Initiated (MM/DD/YYYY):	
		23/2006 Exact Explanation not exact, provide explanation:	
4.		ocket/Case Number: D. 0269-S-5/06	
5.	<i>Advi</i> N/A	dvisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):	
6.	No F	incipal Product Type: b Product her Product Types:	
7.	SEC COD DEM SUP DEM	escribe the allegations related to this regulatory action (your response must fit within the space provided): ECTION 517.121(1) OF THE FLORIDA STATUTES AND SECTIONS 69W-600.014(1), 69W-600.004(3)(C) AND 69W-600.013(1)(P) OF THE FLORIDA ADMINISTRATIVE DDE; SEC RULE 17A-3(A)(17)(I)(B)(1); NASD CONDUCT RULE 3010(B)(1). FIRM IMPLEMENTED INADEQUATE PROCEDURES AND THEREFORE COULD NOT EMONSTRATE IT PROVIDED EACH CLIENT WITH A NEW ACCOUNT FORM TO VERIFY/UPDATE ACCOUNT INFORMATION; FAILED TO FOLLOW ITS WRITTEN UPPERVISORY PROCEDURES BY NOT TIMELY AMENDING STATE'S BRANCH OFFICE REGISTRATION FORMS; AND FAILED TO MAINTAIN DOCUMENTATION EMONSTRATING IT ENFORCED ITS WRITTEN PROCEDURES PREVENTING REPRESENTATIVES IN THE JACKSONVILLE BRANCH OFFICE FROM ENGAGING IN UTSIDE INVESTMENT ADVISORY BUSINESS WITHOUT WRITTEN NOTICE TO THE FIRM.	
8.	Curr	urrent Status? C Pending C On Appeal C Final	
9.	If on	on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:	
lf Fi	inal o	or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.	
10.	How	ow was matter resolved:	
	Stip	ipulation and Consent	
11.	Reso	esolution Date (MM/DD/YYYY):	
		23/2006 Exact Explanation	
	If no	not exact, provide explanation:	
12.	Res	esolution Detail:	
	A.	. Were any of the following Sanctions Ordered (check all appropriate items)?	
		Monetary/Fine Amount: \$ 20,000.00	
		Revocation/Expulsion/Denial Disgorgement/Restitution	
		☐ Censure ☐ Cease and Desist/Injunction	
		☐ Bar ☐ Suspension	
	В.	NONE Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and where condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied as you or an <i>advisory affiliate</i> , date paid and if any portion of penalty was waived: \$20,000.00 PAID ON JUNE 9, 2006.	ther
13.	prov	ovide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the sovided). HE STATE OF FLORIDA, OFFICE OF FINANCIAL REGULATION AND THE FIRM ENTERED INTO A STIPULATION AND CONSENT AGREEMENT IN ORDER TO RESO	•

(Full name of regulator, *foreign financial regulatory authority*, federal, state, or *SRO*)

AND CONCLUDE THIS MATTER. THE FINAL ORDER WAS DATED JUNE 23, 2006.

			GENERAL INSTRUCTIONS		
This	Disclosure Reporting Page (DF	RP ADV) is an 👩 INITIAL 🚜 🔘 A	MENDED response used to report de	etails for affirmative responses to Item	ns 11.C., 11.D., 11.E., 11.F. or 11.G.
	orm ADV.	o on			
0					
			Regulatory Action		
Chec	ck item(s) being responded to:				
□ 1	1.C(1)	□ 11.C(2)	□ 11.C(3)	11.C(4)	□ 11.C(5)
	1.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)
		. ,		· /	L 11.D(3)
	1.E(1)	☑ 11.E(2)	□ 11.E(3)	□ 11.E(4)	
□ 1	1.F.	☐ 11.G.			
Exec	eution Page. event may result in more than o	· ·	proceeding may be reported for more. C., 11.D., 11.E., 11.F. or 11.G. Use or on on a separate DRP.	· · · · · · · · · · · · · · · · · · ·	
	,	, ,	·		
PAR	ТІ				
A.	The person(s) or entity(ies) for	r whom this DRP is being filed is (ar	re):		
	You (the advisory firm)	3 11 (11	,		
	~				
	O You and one or more of you	our			
	One or more of your adviso	ory affiliates			
	_	-	e of the <i>advisory affiliate</i> below (for ine f not, indicate "non-registered" by che		ddle name).
	ADV DRP - ADVISORY AFFIL	LIATE			
	CRD 29604 Number:	This adviso	ry affiliate is	dual	
	Registered:	do.			
	Name: NATIONAL PL				
	CORPORATIO				
	(For individuals	ls, Last, First, Middle)			
B.	 □ This DRP should be remove registration with the SEC of the second of t	ved from the ADV record because: (or reporting as an exempt reporting ering with a state securities authority ago. If you are registered or registered from the ADV record because it tered through the IARD system or Cono other information on this DRP more	the advisory affiliate(s) is no longer as (1) the event or proceeding occurred adviser with the SEC and the event of the e	more than ten years ago or (2) the actives resolved in the adviser's or advisor to you reported only in response to Item DRP for any event listed in Item 11 to elerical or data-entry mistake. Explain submitted a DRP (with Form ADV, BI	ory affiliate's favor. m 11.D(4), and only if that event hat occurred more than ten years the circumstances:
PAR	ТІІ				
1.	Regulatory Action initiated by:				
	•	State C SRO C Foreign			
	(Full name of regulator, foreign	n financial regulatory authority, fede	eral, state, or SRO)		
2.	Principal Sanction:				
	Other Or C				
	Other Sanctions:				
	D (1 %) 1 % ***				
3.	Date Initiated (MM/DD/YYYY):				
	C Exact C Explanation				

If not exact, provide explanation:

4.	. Docket/Case Number:					
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):					
6.	Principal Product Type:					
	Othe	er Product Types:				
7.	Desc	cribe the allegations	related to this regulatory action	on (your response must fit within th	ne space provided):	
8.	Current Status? C Pending C On Appeal C Final					
9.	If on	appeal, regulatory a	action appealed to (SEC, <i>SRO</i>), Federal or State Court) and Date	Appeal Filed:	
If Fi	nal oı	r On Appeal, comple	ete all items below. For Pendin	ng Actions, complete Item 13 only.		
10.	How	was matter resolve	d:			
11.	Reso	olution Date (MM/DD	/YYYY):			
		Exact C Explanat				
	If no	t exact, provide expla	anation:			
12.	Res	olution Detail:				
	A.	Were any of the fol	lowing Sanctions Ordered (ch	eck all appropriate items)?		
		■ Monetary/Fine	Amount: \$			
		Revocation/Ex	pulsion/Denial		☐ Disgorgement/Restitution	
		Censure			☐ Cease and Desist/Injunction	
		☐ Bar			☐ Suspension	
	B.	Other Sanctions O	rdered:			
13.		Principal, etc.). If recondition has been you or an <i>advisory</i>	equalification by exam/retraining satisfied. If disposition result affiliate, date paid and if any p	ng was a condition of the sanction, ed in a fine, penalty, restitution, disportion of penalty was waived:	provide length of time given to requalify sgorgement or monetary compensation	ecurities Principal, Financial Operations /retrain, type of exam required and whether n, provide total amount, portion levied against ates (your response must fit within the space
Thie	Discl	osure Reporting Pag	ne (DRP ADV) is an INITIA	GENERAL INST		ness to Itams 11 C 11 D 11 E 11 E or 11 G
			ge (Diti ADV) is all 👩 liviliz	OR O AMENDED response us	ed to report details for animative response	onses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
of Fo	rm Al	DV.				
01		/ \	1.	Regulatory	Action	
		m(s) being responde		-	-	5
	1.C(1		11.C(2)	□ 11.C(3)	11.C(4)	☐ 11.C(5)
	1.D(1		☑ 11.D(2)	11.D(3)	☑ 11.D(4)	□ 11.D(5)
\square 1	1.E(1)	■ 11.E(2)	□ 11.E(3)	□ 11.E(4)	
□ 1	1.F.		□ 11.G.			
	Use a separate DRP for each event or <i>proceeding</i> . The same event or <i>proceeding</i> may be reported for more than one <i>person</i> or entity using one DRP. File with a completed Execution Page.					
				o Items 11.C., 11.D., 11.E., 11.F. or each action on a separate DRP.		ails related to the same event. If an event gives
PAR	ГΙ					
		person(s) or entity(ie	es) for whom this DRP is being	g filed is (are):		
	C You (the advisory firm)					

You and one	e or more of your advisory affiliates
	e of your advisory affiliates
	eing filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name). If not, indicate "non-registered" by checking the appropriate box.
ADV DRP - AD	VISORY AFFILIATE
CRD Number: Registered:	29604 This advisory affiliate is • a Firm • an Individual
Name:	Yes O No NATIONAL PLANNING CORPORATION (For individuals, Last, First, Middle)
This DRP st	nould be removed from the ADV record because the advisory affiliate(s) is no longer associated with the adviser. nould be removed from the ADV record because: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is registered or applying for with the SEC or reporting as an exempt reporting adviser with the SEC and the event was resolved in the adviser's or advisory affiliate's favor.
· ·	tered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years
☐ This DRP sl	nould be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
= = = = = = = = = = = = = = = = = = =	ffiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the swer is "Yes," no other information on this DRP must be provided.
⊙ Yes C N	lo l
NOTE: The com	apletion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
RTII	
Regulatory Action	on initiated by: ner Federal 🎅 ^{State} 🔘 _{SRO} C ^{Foreign}
•	egulator, foreign financial regulatory authority, federal, state, or SRO) RIDA DEPARTMENT OF BANKING AND FINANCE
Principal Sancti Civil and Admin Other Sanctions NONE	istrative Penalt(ies) /Fine(s)
Date Initiated (M	M/DD/YYYY):
	Exact C Explanation vide explanation:
Docket/Case N 32430-S -4/01	umber:
Advisory Affiliat N/A	e Employing Firm when activity occurred which led to the regulatory action (if applicable):
Principal Product No Product Other Product T	
NATIONAL PLA	egations related to this regulatory action (your response must fit within the space provided): NNING CORPORATION INADVERTENTLY FAILED TO REGISTER TWO BRANCH OFFICES DIRECTLY WITH THE STATE. THESE OFFICES WERE LY REGISTERED WITH NASD REGULATION
Current Status?	C Pending C On Appeal C Final
If an appeal red	aulatory action appealed to (SEC, SPO, Enderal or State Court) and Date Appeal Filed:

If Fin	al or On Appea	al, complete all items below. For Pe	ending Actions, complete Item 13 only.			
10	How was matte	ar resolved:				
	Stipulation and					
	·					
11.	Resolution Date	e (MM/DD/YYYY):				
	06/19/2001 ⓒ	Exact C Explanation				
	If not exact, pro	ovide explanation:				
12.	Resolution Det	tail:				
	A. Were any	of the following Sanctions Ordered	d (check all appropriate items)?			
	✓ Mone	etary/Fine Amount: \$ 10,000.00				
	Revo	cation/Expulsion/Denial		☐ Disgorgement/Restitution		
	Cens	sure		☐ Cease and Desist/Injunction		
	☐ Bar			☐ Suspension		
	B. Other Sar	nctions Ordered:				
	NONE	details if accompanied a softing of an is		-t diti#td (Od O	and the Driving Figure 1. Consequent	
			-		ecurities Principal, Financial Operations /retrain, type of exam required and whether	
	•	•			, provide total amount, portion levied against	
	-	advisory affiliate, date paid and if a	any portion of penalty was waived:			
	JUNE 1, 2	2001 \$10,000.00				
	Provide a brief provided).	summary of details related to the a	action status and (or) disposition and in	clude relevant terms, conditions and d	ates (your response must fit within the space)
	,	D TO APPROVE THE BRANCH OF	FFICE APPLICATIONS FOR REGISTRA	TION AND NATIONAL PLANNING CORE	PORATION AGREED TO CEASE AND DESIST	Г
			HAPTER 517, FLORIDA STATUTES AN			•
			GENERAL INST	RUCTIONS		
This E	Disclosure Rep	orting Page (DRP ADV) is an 👩 II	GENERAL INST NITIAL OR O AMENDED response us		nses to Items 11.C., 11.D., 11.E., 11.F. or 11.	G.
	Disclosure Rep	orting Page (DRP ADV) is an 👩 II			nses to Items 11.C., 11.D., 11.E., 11.F. or 11.	G.
		orting Page (DRP ADV) is an 👩 II	NITIAL OR C AMENDED response us	ed to report details for affirmative respo	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.	G.
of For	m ADV.			ed to report details for affirmative respo	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.	G.
of For	m ADV.	orting Page (DRP ADV) is an II	NITIAL OR C AMENDED response us	ed to report details for affirmative respo	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.	G.
of For	m ADV. k item(s) being	responded to:	NITIAL OR C AMENDED response use	ed to report details for affirmative respo		G.
Check	m ADV. k item(s) being l.C(1)	responded to:	Regulatory	ed to report details for affirmative responses to report details for a firmative responses to report details for a firmative response	□ 11.C(5)	G.
Check	m ADV. (item(s) being (.C(1) (.D(1) (.E(1)	responded to: ☐ 11.C(2) ☑ 11.D(2)	Regulatory	Action 11.C(4) 11.D(4)	□ 11.C(5)	G.
of Ford	m ADV. (item(s) being (.C(1) (.D(1) (.E(1)	responded to: ☐ 11.C(2) ☑ 11.D(2) ☐ 11.E(2)	Regulatory	Action 11.C(4) 11.D(4)	□ 11.C(5)	G.
of Ford	m ADV. (item(s) being (.C(1) (.D(1) (.E(1) (.F.	responded to: ☐ 11.C(2) ☑ 11.D(2) ☐ 11.E(2) ☐ 11.G.	Regulatory	Action 11.C(4) 11.D(4) 11.E(4)	☐ 11.C(5) ☐ 11.D(5)	G.
of Ford	m ADV. (item(s) being (.C(1) (.D(1) (.E(1) (.F.	responded to: ☐ 11.C(2) ☑ 11.D(2) ☐ 11.E(2) ☐ 11.G.	Regulatory	Action 11.C(4) 11.D(4) 11.E(4)	□ 11.C(5)	G.
of Ford	m ADV. c item(s) being .C(1) .D(1) .E(1) .F.	responded to: ☐ 11.C(2) ☑ 11.D(2) ☐ 11.E(2) ☐ 11.G.	Regulatory	Action 11.C(4) 11.D(4) 11.E(4)	☐ 11.C(5) ☐ 11.D(5)	G.
of Ford Check 111 111 111 111 Use a Execut	m ADV. (item(s) being (.C(1) (.D(1) (.E(1) (.F. (separate DRP) (ition Page. (event may result	responded to: 11.C(2) 11.D(2) 11.E(2) 11.G. 7 for each event or <i>proceeding</i> . The	Regulatory of 11.C(3) 11.D(3) 11.E(3) e same event or <i>proceeding</i> may be regulatory and the same event of the same e	Action 11.C(4) 11.D(4) 11.E(4) orted for more than one <i>person</i> or entities.	☐ 11.C(5) ☐ 11.D(5)	
of Ford Check 111 111 111 111 Use a Execut	m ADV. (item(s) being (.C(1) (.D(1) (.E(1) (.F. (separate DRP) (ition Page. (event may result	responded to: 11.C(2) 11.D(2) 11.E(2) 11.G. 7 for each event or <i>proceeding</i> . The	Regulatory Regulatory 11.C(3) 11.D(3) 11.E(3) e same event or <i>proceeding</i> may be regulatory	Action 11.C(4) 11.D(4) 11.E(4) orted for more than one <i>person</i> or entities.	☐ 11.C(5) ☐ 11.D(5) ty using one DRP. File with a completed	
of Ford Check 111 111 111 111 Use a Execut	m ADV. c item(s) being .C(1) .D(1) .E(1) .F. separate DRP ution Page. event may result actions by mo	responded to: 11.C(2) 11.D(2) 11.E(2) 11.G. 7 for each event or <i>proceeding</i> . The	Regulatory of 11.C(3) 11.D(3) 11.E(3) e same event or <i>proceeding</i> may be regulatory and the same event of the same e	Action 11.C(4) 11.D(4) 11.E(4) orted for more than one <i>person</i> or entities.	☐ 11.C(5) ☐ 11.D(5) ty using one DRP. File with a completed	
Of Ford Check 111 111 111 Use a Execut One e rise to	m ADV. (c item(s) being (.C(1) (.D(1) (.E(1) (.F. (.Separate DRP) (.Tition Page. (.Event may result (.Even ma	responded to: 11.C(2) 11.D(2) 11.E(2) 11.G. 7 for each event or <i>proceeding</i> . The	Regulatory Regulatory 11.C(3) 11.D(3) 11.E(3) e same event or <i>proceeding</i> may be regulatory and the same event or proceeding may be regulated to litems 11.C., 11.D., 11.E., 11.F. of ails for each action on a separate DRP.	Action 11.C(4) 11.D(4) 11.E(4) orted for more than one <i>person</i> or entities.	☐ 11.C(5) ☐ 11.D(5) ty using one DRP. File with a completed	
Of Form Check 111 111 111 Use as Execution One erise to the part A.	m ADV. (c item(s) being (.C(1) (.D(1) (.E(1) (.F. (.Separate DRP) (.Tition Page. (.Event may result (.Even ma	Tresponded to: ☐ 11.C(2) ☐ 11.D(2) ☐ 11.E(2) ☐ 11.G. If or each event or proceeding. The ore than one affirmative answers that one regulator, provide details or entity(ies) for whom this DRP is	Regulatory Regulatory 11.C(3) 11.D(3) 11.E(3) e same event or <i>proceeding</i> may be regulatory and the same event or proceeding may be regulated to litems 11.C., 11.D., 11.E., 11.F. of ails for each action on a separate DRP.	Action 11.C(4) 11.D(4) 11.E(4) orted for more than one <i>person</i> or entities.	☐ 11.C(5) ☐ 11.D(5) ty using one DRP. File with a completed	
of Ford Check 111 111 111 Use a Execut One e rise to	item(s) being C(1) D(1) E(1) F. separate DRP Ition Page. event may result actions by moderate of the person(s) of the person(s) of the person of the	In responded to: 11.C(2) 11.D(2) 11.E(2) 11.G. If or each event or proceeding. The late in more than one affirmative answers than one regulator, provide details or entity(ies) for whom this DRP is livisory firm)	Regulatory of the same event or proceeding may be required by the same event or proceeding may be required by the same event or a separate DRP.	Action 11.C(4) 11.D(4) 11.E(4) orted for more than one <i>person</i> or entities.	☐ 11.C(5) ☐ 11.D(5) ty using one DRP. File with a completed	
of Form Check 111 111 111 Use a Execut One erise to PART A.	item(s) being C(1) D(1) E(1) F. separate DRP Ition Page. event may result actions by moderate of the person(s) of the person of the per	In responded to: 11.C(2) 11.D(2) 11.E(2) 11.G. If or each event or proceeding. The ore than one affirmative answers than one regulator, provide details or entity(ies) for whom this DRP is alvisory firm) The or more of your advisory affiliates.	Regulatory of the same event or proceeding may be required by the same event or proceeding may be required by the same event or a separate DRP.	Action 11.C(4) 11.D(4) 11.E(4) orted for more than one <i>person</i> or entities.	☐ 11.C(5) ☐ 11.D(5) ty using one DRP. File with a completed	
of Form Check 111 111 111 Use a Execut One erise to PART A.	item(s) being C(1) D(1) E(1) F. separate DRP Ition Page. event may result actions by moderate of the person(s) of the person of the per	In responded to: 11.C(2) 11.D(2) 11.E(2) 11.G. If or each event or proceeding. The late in more than one affirmative answers than one regulator, provide details or entity(ies) for whom this DRP is livisory firm)	Regulatory of the same event or proceeding may be required by the same event or proceeding may be required by the same event or a separate DRP.	Action 11.C(4) 11.D(4) 11.E(4) orted for more than one <i>person</i> or entities.	☐ 11.C(5) ☐ 11.D(5) ty using one DRP. File with a completed	
of Form Check 111 111 111 Use a Execut One erise to PART A.	item(s) being C(1) D(1) E(1) F. separate DRP Ition Page. event may result actions by moderations by moderate of the person(s) of the person of the p	In responded to: In 11.C(2) In 11.D(2) In 11.E(2) In 11.G. If or each event or proceeding. The last in more than one affirmative answore than one regulator, provide details or entity(ies) for whom this DRP is livisory firm) In each event or proceeding advisory affiliates the last in more of your advisory affiliates and advisory affiliates and advisory affiliates.	Regulatory of the same event or proceeding may be regulated for each action on a separate DRP. AMENDED response using the same used in the same and same event or the same event or proceeding may be regulated as the same event or pro	Action 11.C(4) 11.D(4) 11.E(4) orted for more than one <i>person</i> or entire than one <i>person</i> or entire than the content of	11.C(5) 11.D(5) ty using one DRP. File with a completed ails related to the same event. If an event give	
of Form Check 11 11 11 11 Use a Execut One erise to	item(s) being C(1) D(1) E(1) F. separate DRP ution Page. event may result actions by moderate of the person(s) of the address of the person of the per	responded to: 11.C(2) 11.D(2) 11.E(2) 11.G. 7 for each event or proceeding. The left in more than one affirmative answore than one regulator, provide detained or entity(ies) for whom this DRP is levisory firm) The or more of your advisory affiliates the end of your advisory affiliates the end of your advisory affiliates.	Regulatory Regulatory 11.C(3) 11.D(3) 11.E(3) e same event or <i>proceeding</i> may be regulatory and the same event or proceeding may be regulated by the same event of a separate DRP. wer to Items 11.C., 11.D., 11.E., 11.F. of a separate DRP. being filed is (are):	Action 11.C(4) 11.D(4) 11.E(4) 11.E(4) 11.E(4)	11.C(5) 11.D(5) ty using one DRP. File with a completed ails related to the same event. If an event give	
of Form Check 11 11 11 11 Use a Execut One erise to	item(s) being C(1) D(1) E(1) F. separate DRP ution Page. event may result actions by moderate of the person(s) of the address of the person of the per	responded to: 11.C(2) 11.D(2) 11.E(2) 11.G. 7 for each event or proceeding. The left in more than one affirmative answore than one regulator, provide detained or entity(ies) for whom this DRP is levisory firm) The or more of your advisory affiliates the end of your advisory affiliates the end of your advisory affiliates.	Regulatory of the same event or proceeding may be regulated for each action on a separate DRP. AMENDED response using the same used in the same and same event or the same event or proceeding may be regulated as the same event or pro	Action 11.C(4) 11.D(4) 11.E(4) 11.E(4) 11.E(4)	11.C(5) 11.D(5) ty using one DRP. File with a completed ails related to the same event. If an event give	
of Form Check 11 11 11 11 Use a Execut One erise to	item(s) being C(1) D(1) E(1) F. separate DRP Ition Page. event may result actions by moderations by moderate of the person(s) of the addition of the person of the person of the person of the advisory and the advisory an	responded to: 11.C(2) 11.D(2) 11.E(2) 11.G. 7 for each event or proceeding. The left in more than one affirmative answore than one regulator, provide detained or entity(ies) for whom this DRP is levisory firm) The or more of your advisory affiliates the end of your advisory affiliates the end of your advisory affiliates.	Regulatory Regulatory 11.C(3) 11.D(3) 11.E(3) e same event or <i>proceeding</i> may be regulatory and the same event or proceeding may be regulated by the same event of a separate DRP. wer to Items 11.C., 11.D., 11.E., 11.F. of a separate DRP. being filed is (are):	Action 11.C(4) 11.D(4) 11.E(4) 11.E(4) 11.E(4)	11.C(5) 11.D(5) ty using one DRP. File with a completed ails related to the same event. If an event give	
of Form Check 11 11 11 11 Use a Execut One erise to	item(s) being C(1) D(1) E(1) F. separate DRP Ition Page. event may result actions by moderate of the person(s) of the advisory at the a	responded to: 11.C(2) 11.D(2) 11.E(2) 11.G. It in more than one affirmative answore than one regulator, provide detained by the correction of the corre	Regulatory Regulatory 11.C(3) 11.D(3) 11.E(3) e same event or <i>proceeding</i> may be regulatory at the full name of the <i>advisory affiliate</i> that number. If not, indicate "non-registed is the same and the same at	Action 11.C(4) 11.D(4) 11.E(4) 11.E(4) 11.G. Use only one DRP to report deta be below (for individuals, Last name, First stered" by checking the appropriate box	11.C(5) 11.D(5) ty using one DRP. File with a completed ails related to the same event. If an event give	
of Form Check 11 11 11 11 Use a Execut One erise to	item(s) being C(1) D(1) E(1) F. separate DRP Ition Page. event may result actions by moderate of the person(s) of the person of this DRP is being the advisory of the a	responded to: 11.C(2) 11.D(2) 11.E(2) 11.G. 7 for each event or proceeding. The left in more than one affirmative answore than one regulator, provide detained or entity(ies) for whom this DRP is livisory firm) The e or more of your advisory affiliates the e of your advisory affiliates the ing filed for an advisory affiliate, graffiliate has a CRD number, provided.	Regulatory Regulatory 11.C(3) 11.D(3) 11.E(3) e same event or <i>proceeding</i> may be regulatory and the same event or proceeding may be regulated by the same event of a separate DRP. wer to Items 11.C., 11.D., 11.E., 11.F. of a separate DRP. being filed is (are):	Action 11.C(4) 11.D(4) 11.E(4) 11.E(4) 11.G. Use only one DRP to report deta be below (for individuals, Last name, First stered" by checking the appropriate box	11.C(5) 11.D(5) ty using one DRP. File with a completed ails related to the same event. If an event give	
of Ford Check 11 11 11 11 Use a Execut One erise to	item(s) being C(1) D(1) E(1) F. separate DRP Ition Page. event may result actions by moderate of the person(s) of the advisory at the a	responded to: 11.C(2) 11.D(2) 11.E(2) 11.G. It in more than one affirmative answore than one regulator, provide detained by the correction of the corre	Regulatory Regulatory 11.C(3) 11.D(3) 11.E(3) e same event or <i>proceeding</i> may be regulatory at the full name of the <i>advisory affiliate</i> that number. If not, indicate "non-registed is the same and the same at	Action 11.C(4) 11.D(4) 11.E(4) 11.E(4) 11.G. Use only one DRP to report deta be below (for individuals, Last name, First stered" by checking the appropriate box	11.C(5) 11.D(5) ty using one DRP. File with a completed ails related to the same event. If an event give	

CORPORATION

	(For individuals, Last, First, Middle)			
	 □ This DRP should be removed from the ADV record because the advisory affiliate(s) is □ This DRP should be removed from the ADV record because: (1) the event or proceeding registration with the SEC or reporting as an exempt reporting adviser with the SEC and If you are registered or registering with a state securities authority, you may remove a DR occurred more than ten years ago. If you are registered or registering with the SEC, you mago. □ This DRP should be removed from the ADV record because it was filed in error, such the securities authority is a such as the securities authority. 	ng occurred more than ten years ago or (2) the adviser is registered or applying for d the event was resolved in the adviser's or advisory affiliate's favor. P for an event you reported only in response to Item 11.D(4), and only if that event hay remove a DRP for any event listed in Item 11 that occurred more than ten years		
_				
B.	If the advisory affiliate is registered through the IARD system or <i>CRD</i> system, has the adv event? If the answer is "Yes," no other information on this DRP must be provided.	isory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the		
	• Yes • No			
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to	update its IARD or <i>CRD</i> records.		
PAR	ГІІ			
1.	Regulatory Action initiated by: O SEC O Other Federal O State O SRO O Foreign (Full name of regulator, foreign financial regulatory authority, federal, state, or SRO)			
2.	Principal Sanction:			
	Other Sanctions:			
3.	Date Initiated (MM/DD/YYYY): © Exact © Explanation If not exact, provide explanation:			
4.	Docket/Case Number:			
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action	(if applicable):		
6.	Principal Product Type:			
	Other Product Types:			
7.	Describe the allegations related to this regulatory action (your response must fit within the	e space provided):		
8.	Current Status? Pending On Appeal Final			
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date A	ppeal Filed:		
lf Fi	nal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.			
10.	How was matter resolved:			
11.	Resolution Date (MM/DD/YYYY):			
	C Exact C Explanation			
	If not exact, provide explanation:			
12.	Resolution Detail:			
	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)? Monetary/Fine Amount: \$ Revocation/Expulsion/Denial Censure	☐ Disgorgement/Restitution ☐ Cease and Desist/Injunction		
	☐ Bar	☐ Suspension		
	B. Other Sanctions <i>Ordered:</i>			

Princ cond	ction detail: if suspended, enjoined or barre sipal, etc.). If requalification by exam/retraining ition has been satisfied. If disposition result or an advisory affiliate, date paid and if any p	ng was a condition of the sanction, proted in a fine, penalty, restitution, disgo	vide length of time given to requalify/	
	3. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided).			
		GENERAL INSTRU		
This Disclosure of Form ADV.	Reporting Page (DRP ADV) is an INITIA	AL OR AMENDED response used to	o report details for affirmative respor	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
		Regulatory Acti	ion	
Check item(s) b	peing responded to:	Regulatory Not	Oli	
11.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	☐ 11.C(5)
□ 11.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)
□ 11.E(1)	✓ 11.E(2)	□ 11.E(3)	□ 11.E(4)	E 11.D(0)
☐ 11.E(1)	□ 11.G.	L 11.L(3)	L 11.L(4)	
Execution Page One event may		to Items 11.C., 11.D., 11.E., 11.F. or 11	·	y using one DRP. File with a completed ils related to the same event. If an event gives
PART I		m		
•	n(s) or entity(ies) for whom this DRP is beir ne advisory firm)	ng filed is (are):		
C You ar	nd one or more of your advisory affiliates			
	more of your advisory affiliates			
	P is being filed for an <i>advisory affiliate</i> , give to sory affiliate has a <i>CRD</i> number, provide that		•	·
ADV DRF	- ADVISORY AFFILIATE			
CRD Number Register		This <i>advisory affiliate</i> is ⓒ a Firm ⓒ	an Individual	
Name:	NATIONAL PLANNING CORPORATION (For individuals, Last, First, Middle)			
This D	RP should be removed from the ADV record RP should be removed from the ADV record ation with the SEC or reporting as an exemple.	d because: (1) the event or proceeding	occurred more than ten years ago o	or (2) the adviser is registered or applying for
	registered or registering with a <i>state securi</i> ng more than ten years ago. If you are registered			oonse to Item 11.D(4), and only if that event in Item 11 that occurred more than ten years
☐ This D	RP should be removed from the ADV recor	d because it was filed in error, such as	due to a clerical or data-entry mista	ke. Explain the circumstances:
	sory affiliate is registered through the IARD and answer is "Yes," no other information on	-	ory affiliate submitted a DRP (with Fo	rm ADV, BD or U-4) to the IARD or <i>CRD</i> for the
• Yes	C No			
NOTE: Th	e completion of this form does not relieve th	ne advisory affiliate of its obligation to u	pdate its IARD or <i>CRD</i> records.	
PART II				
-	Action initiated by: Other Federal Ostate Osro OFo	preign		

	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO)					
2.	2. Principal Sanction:					
	Other Sanctions:					
3.	Date Initiated (MM/DD/YYYY): © Exact © Explanation If not exact, provide explanation:					
4.	Docket/Case Number:					
5.	Advisory Affiliate Employing F	irm when activity occurre	ed which led to the regulatory action (if a	applicable):		
6.	Principal Product Type:					
	Other Product Types:					
7.	Describe the allegations relate	ed to this regulatory action	on (your response must fit within the sp	pace provided):		
8.	Current Status? C Pendi	ng C On Appeal C	Final			
9.	If on appeal, regulatory action	appealed to (SEC, SRO,	, Federal or State Court) and Date Appo	eal Filed:		
lf Fi	nal or On Appeal, complete all	items below. For Pendin	g Actions, complete Item 13 only.			
10.	How was matter resolved:					
11.	Resolution Date (MM/DD/YYY)	Y):				
	C Exact C Explanation					
	If not exact, provide explanation	on:				
12.	Resolution Detail:					
	A. Were any of the following	g Sanctions Ordered (che	eck all appropriate items)?			
	☐ Monetary/Fine Amou	unt: \$				
	Revocation/Expulsion	on/Denial		Disgorgement/Restitution		
	Censure			Cease and Desist/Injunction		
	Bar			Suspension		
	B. Other Sanctions Ordered	d:				
Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion of penalty was waived: 13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided).						
			GENERAL INSTRUC			
	Disclosure Reporting Page (Dom ADV.	RP ADV) is an 👩 INITIA	NA OR C AMENDED response used to	o report details for affirmative respon	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.	
Ch -	ok itom(a) haing recorded t		Regulatory Action	on		
	ck item(s) being responded to: 1.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)	
	1.C(1) 1.D(1)	□ 11.C(2) □ 11.D(2)	□ 11.C(3) □ 11.D(3)	□ 11.C(4) □ 11.D(4)	□ 11.C(5) □ 11.D(5)	
	1.D(1) 1.E(1)	■ 11.D(2) ■ 11.E(2)	□ 11.D(3) □ 11.E(3)	□ 11.D(4) □ 11.E(4)	⊔ 11. <i>□</i> (៦)	
	1.E(1) 1.F.	№ 11.E(2)	L 11.E(3)	III 11.E(4)		
	Tal.	L 11.G.				

	a separate DRP for each event or <i>proceeding</i> . The same event or <i>proceeding</i> may be reported for more than one <i>person</i> or entity using one DRP. File with a completed cution Page.
	e event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the same event. If an event gives to actions by more than one regulator, provide details for each action on a separate DRP.
PAF	TI
A.	The person(s) or entity(ies) for whom this DRP is being filed is (are): You (the advisory firm)
	C You and one or more of your advisory affiliates
	One or more of your advisory affiliates
	If this DRP is being filed for an advisory affiliate, give the full name of the advisory affiliate below (for individuals, Last name, First name, Middle name). If the advisory affiliate has a CRD number, provide that number. If not, indicate "non-registered" by checking the appropriate box.
	ADV DRP - ADVISORY AFFILIATE
	No Information Filed
	This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the adviser's or <i>advisory affiliate</i> 's favor.
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.
	C Yes C No
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
PAF	T II
1.	Regulatory Action initiated by: C SEC Other Federal State SRO Foreign
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) NASD
2.	Principal Sanction: Civil and Administrative Penalt(ies) /Fine(s) Other Sanctions: CENSURE
3.	Date Initiated (MM/DD/YYYY):
	10/16/2006 Exact Explanation If not exact, provide explanation:
4.	Docket/Case Number: NO.E0720050201-01
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable): N/A
6.	Principal Product Type: Other
	Other Product Types: MUNICIPAL BONDS
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): MSRD GENERAL RULES G-14 AND G-15(A)(I)(A)(1). THE FIRM FAILED TO TIMELY REPORT TO THE MUNICIPAL SECURITIES RULEMAKING BOARD ("MSRB") CERTAIN MUNICIPAL BOND TRANSACTIONS AND FAILED TO ACCURATELY REPORT CERTAIN CUSTOMER TRADE PRICES AND THE CAPACITY IN WHICH THE FIRM CONDUCTED THE TRANSACTIONS FURTHERMORE WITH RESPECT TO CERTAIN MUNICIPAL TRANSACTIONS. THE FIRM SENT CUSTOMERS WRITTEN

	CONFIRMATIONS THAT INCORRECTLY INDICATED THAT THE FIRM ACTED AS AN AGENT FOR THE TRANSACTIONS IN WHICH THE FIRM ACTED AS A PRINCIPAL.					
8.	8. Current Status? C Pending C On Appeal Final					
9.	 If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed: N/A 					
If Fi	inal or On Appeal, complete all	items below. For Pendi	ing Actions, complete Item 13 only.			
10.	How was matter resolved:					
	Acceptance, Waiver & Consen	t(AWC)				
11.	Resolution Date (MM/DD/YYYY	():				
	10/16/2006 © Exact © Ex	planation				
	If not exact, provide explanation	n:				
12.	Resolution Detail:					
	A. Were any of the following	g Sanctions <i>Ordered</i> (c	heck all appropriate items)?			
		nt: \$ 10,000.00				
	Revocation/Expulsio	n/Denial		☐ Disgorgement/Restitution		
				Cease and Desist/Injunction		
	☐ Bar			Suspension		
	B. Other Sanctions Ordered	d:				
13.	Principal, etc.). If requalif condition has been satisfy you or an advisory affiliate \$10,000.00 PAID ON 11/ Provide a brief summary of deprovided).	ication by exam/retrain fied. If disposition resulte, date paid and if any 6/2006. Stails related to the action of the interest of the intere	ing was a condition of the sanction, p Ited in a fine, penalty, restitution, disp portion of penalty was waived: on status and (or) disposition and inc on INVEST FINANCIAL CORPORATIO	rovide length of time given to requalify gorgement or monetary compensation government or monetary compensation and conditions are conditions.	Securities Principal, Financial Operations y/retrain, type of exam required and whether in, provide total amount, portion levied against dates (your response must fit within the space of SANCTIONS AND TO THE ENTRY OF	
T 1 ·	D: 1 D (: D (D)	DD 4 DV0 : INUT	GENERAL INSTR			
		RP ADV) is an 👩 INITI	OR AMENDED response use	d to report details for affirmative respons	onses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.	
of Fo	orm ADV.					
			Regulatory A	ction		
Che	ck item(s) being responded to:					
	11.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)	
	11.D(1)	☑ 11.D(2)	11.D(3)	☑ 11.D(4)	□ 11.D(5)	
	11.E(1)	11.E(2)	□ 11.E(3)	☐ 11.E(4)		
1	11.F.	□ 11.G.				
Use a separate DRP for each event or <i>proceeding</i> . The same event or <i>proceeding</i> may be reported for more than one <i>person</i> or entity using one DRP. File with a completed Execution Page. One event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the same event. If an event gives rise to actions by more than one regulator, provide details for each action on a separate DRP.						
PAR						
A.	The <i>person(s)</i> or entity(ies) for • You (the advisory firm)	whom this DRP is bei	ng filed is (are):			
	O You and one or more of you	ur advisory affiliates				
	One or more of your advisor					
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name).					

	If the advisory affiliate has a CRD number, provide that number. If not, indicate "non-registered" by checking the appropriate box.
	ADV DRP - ADVISORY AFFILIATE
	No Information Filed
	This DRP should be removed from the ADV record because the advisory affiliate(s) is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an exempt reporting adviser with the SEC and the event was resolved in the adviser's or advisory affiliate's favor.
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.
	C Yes C No
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
PAR	тш
1.	Regulatory Action initiated by: Output Section Section 1. Section
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) STATE OF NEW HAMPSHIRE, BUREAU OF SECURITIES REGULATION
2.	Principal Sanction: Civil and Administrative Penalt(ies) /Fine(s) Other Sanctions: CEASE AND DESIST RESTITUTION
3.	Date Initiated (MM/DD/YYYY):
	08/13/2002 Exact Explanation If not exact, provide explanation:
4.	Docket/Case Number: COM02-009
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Principal Product Type: Other
	Other Product Types: MUTUAL FUND SUB-ACCOUNTS OF VARIABLE ANNUITY.
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): PUTNAM HARTFORD CAPITAL MANAGER VARIABLE ANNUITY SUB-ACCOUNT MUTUAL FUNDS WERE SOLD TO ONE CLIENT WITHOUT SUFFICIENT SUITABILITY ANALYSIS, WERE NOT A SUITABLE INVESTMENT, EXPOSED CLIENT TO UNNECESSARY AND UNWANTED HIGH RISK OF LOSS, AND WERE NOT SUITABLE TO MEET CLIENT'S NEEDS.
8.	Current Status? C Pending C On Appeal Final
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:
If F	inal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.
10.	How was matter resolved: Consent
11.	Resolution Date (MM/DD/YYYY):
	11/05/2003 Exact Explanation If not exact, provide explanation:

12. Resolution	Detail:			
A. Were	any of the following Sanctions Ordere	ed (check all appropriate items)?		
₽ N	Nonetary/Fine Amount: \$ 7,500.00			
	Revocation/Expulsion/Denial		☑ Disgorgement/Restitution	on .
	Censure		☑ Cease and Desist/Injune	
□в	Bar		☐ Suspension	
	Sanctions Ordered:			
B. Other	Sanctions Ordered.			
Princi condi you o	ipal, etc.). If requalification by exam/ret	raining was a condition of the sanctic resulted in a fine, penalty, restitution, any portion of penalty was waived:	on, provide length of time given to , disgorgement or monetary comp	eneral Securities Principal, Financial Operations requalify/retrain, type of exam required and whether tensation, provide total amount, portion levied against LUS INTEREST.
13. Provide a b	orief summary of details related to the	action status and (or) disposition and	d include relevant terms, condition	ns and dates (your response must fit within the space
CIVIL JUDICIAL A	ACTION DISCLOSURE REPORTING PAGE	GE (ADV)		
TI: D: I	D (DDD 4D)();		STRUCTIONS	
This Disclosure	Reporting Page (DRP ADV) is an	OR AMENDED response	used to report details for affirmati	ve responses to Item 11.H. of Part 1A or Item 2.F. of Pa
1B of Form ADV.				
		Civil J	ludicial	
Check Part 1A it	em(s) being responded to:	OIVII 0	radioiai	
□ 11.H(1)(a)		.H(1)(b)	☐ 11.H(1)(c)	☑ 11.H(2)
Charle Daniel 4D is				
2.F(1)	tem(s) being responded to:	2.F(3)	☐ 2.F(4)	☐ 2.F(5)
2.F(1)	L 2.F(2)	L 2.F(3)	L 2.F(4)	LJ 2.F(5)
Execution Page. One event may r	· · · · · · · · · · · · · · · · · · ·			on or entity using one DRP. File with a completed to report details related to the same event. Unrelated civ
A. The person	n(s) or entity(ies) for whom this DRP is	being filed is (are):		
C You (the	e advisory firm)			
~				
	d one or more of your advisory affiliate	S		
One or	more of your advisory affiliates			
If this DRP	is being filed for an <i>advisory affiliate</i> , oory affiliate has a <i>CRD</i> number, provid	-	•	•
ADV DRP	- ADVISORY AFFILIATE			
CRD	<u>16443</u>	This <i>advisory affiliate</i> is 🌀 a Fi	irm. O an Individual	
Number:		This auvisory animale is a Fi	iiiii S aii iiidividdai	
Registere	ed: • Yes O No			
Name:	INVESTMENT CENTERS OF			
	AMERICA, INC.			
	(For individuals, Last, First, Middle	2)		
☐ This DF registra	ation with the SEC or reporting as an ϵ	record because: (1) the event or procexempt reporting adviser with the SEC	eeding occurred more than ten ye C and the event was resolved in the	ears ago or (2) the adviser is registered or applying for the adviser's or advisory affiliate's favor.
ı ıı you are r	egistered of registering with a state so	ecurities authority , you may remove a	וטו an event you reported o	nly in response to Item 11.H.(1)(a), and only if that event

occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years

ago.

	This	DRP should be removed from the ADV record because it was filed in error, s	uch as due to a clerical or data-entry mistake. Explain the circumstances:
B.		visory affiliate is registered through the IARD system or CRD system, has the the answer is "Yes," no other information on this DRP must be provided.	advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the
	Yes	C No	
	NOTE: T	The completion of this form does not relieve the advisory affiliate of its obligation	on to update its IARD or <i>CRD</i> records.
PAR			
1.	Court Ac	ction initiated by: (Name of regulator, foreign financial regulatory authority, SR	J, commodities exchange, agency, firm, private plaintiff, etc.)
2.	Principa	I Relief Sought:	
	Other Re	elief Sought:	
3.	Filing Da	ate of Court Action (MM/DD/YYYY):	
	C Exac	ct C Explanation	
	If not exa	act, provide explanation:	
4.	Principal	I Product Type:	
	Other Pr	roduct Types:	
5.	Formal A	Action was brought in (include name of Federal, State or Foreign Court, Locati	on of Court - City or County <u>and</u> State or Country, Docket/Case Number):
6.	Advisory	Affiliate Employing Firm when activity occurred which led to the civil judicial a	action (if applicable):
7.	Describe	e the allegations related to this civil action (your response must fit within the s	pace provided):
8.	Current	Status? Pending On Appeal Final	
9.	If on app	peal, action appealed to (provide name of court) and Date Appeal Filed (MM/DI	D/YYYY):
10.	If pendin	ng, date notice/process was served (MM/DD/YYYY):	
	C Exac	ct C Explanation	
	If not exa	act, provide explanation:	
If F	inal or On	Appeal, complete all items below. For Pending Actions, complete Item 14 on	y.
11.	How was	s matter resolved:	
12.	Resolution	on Date (MM/DD/YYYY):	
		ct C Explanation	
	If not exa	act, provide explanation:	
13.	Resoluti	on Detail:	
		ere any of the following Sanctions Ordered or Relief Granted(check appropria	re items)?
		Monetary/Fine Amount: \$	_
		Revocation/Expulsion/Denial	Disgorgement/Restitution
		Censure	Cease and Desist/Injunction
		Bar ner Sanctions:	Suspension
			at data and apposition officeted (Occupant) Constition Britain 1. 5"
	Pri cor	ncipal, etc.). If requalification by exam/retraining was a condition of the sanction	rt date and capacities affected (General Securities Principal, Financial Operations n, provide length of time given to requalify/retrain, type of exam required and whether disgorgement, or monetary compensation, provide total amount, portion levied against
14	Provide	a brief cummary of circumstances related to the action(s), allogation(s), disp	osition(s) and/or finding(s) disclosed above (your response must fit within the space

provided).
FIRM DOES NOT BELIEVE THIS MATTER IS REQUIRED TO BE DISCLOSED AS THEY DO NOT BELIEVE THAT IT WILL RESULT IN A "YES" ANSWER TO 11H(1) A,B. OR C. PLEASE REMOVE.

GENERAL INSTRUCTIONS						
This Disclosure Reporting Page (DRP ADV) is an C INI	ITIAL OR O AMENDED response used	to report details for affirmative res	sponses to Item 11.H. of Part 1A or Item 2.F. of Part			
1B of Form ADV.						
	Civil Judic	al				
Check Part 1A item(s) being responded to:	0	ω.				
☐ 11.H(1)(a) ☐ 11.H	(1)(b)	□ 11.H(1)(c)	☑ 11.H(2)			
Check Part 1B item(s) being responded to:	5	5	5			
☐ 2.F(1) ☐ 2.F(2)	□ 2.F(3)	2.F(4)	2.F(5)			
Use a separate DRP for each event or <i>proceeding</i> . The same event or <i>proceeding</i> may be reported for more than one <i>person</i> or entity using one DRP. File with a completed Execution Page.						
One event may result in more than one affirmative answer to Item 11.H. of Part 1A or Item 2.F. of Part 1B. Use only one DRP to report details related to the same event. Unrelated civil judicial actions must be reported on separate DRPs.						
PART I						
A. The <i>person(s)</i> or entity(ies) for whom this DRP is be	eing filed is (are):					
You (the advisory firm)						
~						
C You and one or more of your advisory affiliates						
One or more of your advisory affiliates						
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name). If the <i>advisory affiliate</i> has a <i>CRD</i> number, provide that number. If not, indicate "non-registered" by checking the appropriate box.					
ADV DRP - ADVISORY AFFILIATE						
		F.1. 1				
	No Informati	on Filed				
This DRP should be removed from the ADV record because the advisory affiliate(s) is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an exempt reporting adviser with the SEC and the event was resolved in the adviser's or advisory affiliate's favor.						
If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.H.(1)(a), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.						
☐ This DRP should be removed from the ADV rec	cord because it was filed in error, such a	as due to a clerical or data-entry m	istake. Explain the circumstances:			
B. If the advisory affiliate is registered through the IAR event? If the answer is "Yes," no other information of	-	sory affiliate submitted a DRP (with	n Form ADV, BD or U-4) to the IARD or <i>CRD</i> for the			
C Yes C No						
NOTE: The completion of this form does not relieve	the advisory affiliate of its obligation to	update its IARD or <i>CRD</i> records.				
DART II						
PART II		154				
Court Action initiated by: (Name of regulator, foreign NATHAN GURARY FOR TEMA LTD & EMUNA TRUS		mmodities exchange, agency, firm	i, private plaintiff, etc.)			
Principal Relief Sought: Money Damages (Private/Civil Complaint) Other Relief Sought: \$100,000 WITH INTEREST						
Filing Date of Court Action (MM/DD/YYYY):						
02/26/2001 © Exact C Explanation						
If not exact, provide explanation:						
Principal Product Type: Mutual Fund(s)						

Other Product Types:

5.	SUPREME COURT OF THE STATE OF NEW YORK	or Foreign Court, Location	n of Court - City or County <u>and</u> State o	or Country, Docket/Case Number):		
6.	Advisory Affiliate Employing Firm when activity occurred which INVEST FINANCIAL CORPORATION	led to the civil judicial act	ion (if applicable):			
7.	Describe the allegations related to this civil action (your response must fit within the space provided): ALLEGES REP MISREPRESENTED AND TORTIOUS DIVERSION OF ASSETS TO UNAUTHORIZED INVESTMENT					
8.	Current Status? Pending On Appeal Final					
9.	If on appeal, action appealed to (provide name of court) and Da	ate Appeal Filed (MM/DD/\	YYY):			
10.	0. If pending, date notice/process was served (MM/DD/YYYY): 02/26/2001 © Exact © Explanation If not exact, provide explanation:					
If F	Final or On Appeal, complete all items below. For Pending Action	ns, complete Item 14 only.				
11.	. How was matter resolved: Settled					
12.	2. Resolution Date (MM/DD/YYYY):					
	01/08/2002					
	 A. Were any of the following Sanctions Ordered or Relief G ✓ Monetary/Fine Amount: \$ 55,000.00 ☐ Revocation/Expulsion/Denial ☐ Censure ☐ Bar B. Other Sanctions: C. Sanction detail: if suspended, <i>enjoined</i> or barred, provid Principal, etc.). If requalification by exam/retraining was a condition has been satisfied. If disposition resulted in a f you or an <i>advisory affiliate</i>, date paid and if any portion of SETTLED FOR \$55,000 Provide a brief summary of circumstances related to the actio provided). THE MATTER OF NATHAN GURARY VS. INVEST FINANCIAL OF HELD AT INVEST FINANCIAL CORPORATION (TEMA GURARY ACCOUNT). INVEST FINANCIAL CORPORATION CONTRIBUTION THE SETTLEMENT. 	e duration including start condition of the sanction, ine, penalty, restitution, d f penalty was waived: on(s), allegation(s), dispos CORPORATION WAS SET Y & CHMUEL LABOWSKI)	Disgorgement/Restitution Cease and Desist/Injunction Suspension date and capacities affected (General provide length of time given to requal isgorgement, or monetary compensations) sition(s) and/or finding(s) disclosed at TLED ON 1/8/02. GURARY HAD A CO. THE MATTER WAS SETTLED FOR	lify/retrain, type of exam required and whether tion, provide total amount, portion levied against bove (your response must fit within the space DMPLAINT FOR TWO ACCOUNTS THAT WERE A TOTAL OF \$55,000 (\$27,000 FOR EACH		
		GENERAL INST				
	s Disclosure Reporting Page (DRP ADV) is an O INITIAL OR G	AMENDED response us	sed to report details for affirmative res	ponses to Item 11.H. of Part 1A or Item 2.F. of Par		
01		Civil Jud	dicial			
	eck Part 1A item(s) being responded to: 11.H(1)(a) 11.H(1)(b)		□ 11.H(1)(c)	☑ 11.H(2)		
	eck Part 1B item(s) being responded to: 2.F(1)	□ 2.F(3)	□ 2.F(4)	□ 2.F(5)		
Use	e a separate DRP for each event or <i>proceeding</i> . The same even	t or <i>proceeding</i> may be re	eported for more than one person or e	entity using one DRP. File with a completed		

Execution Page.

	event may result in more than one affirmative answer to Item 11.H. of Part 1A or Item 2.F. of Part 1B. Use only one DRP to report details related to the same event. Unrelated civil cial actions must be reported on separate DRPs.					
PAF	TI					
A.	The person(s) or entity(ies) for whom this DRP is being filed is (are): You (the advisory firm)					
	O You and one or more of your advisory affiliates					
	One or more of your advisory affiliates					
	If this DRP is being filed for an advisory affiliate, give the full name of the advisory affiliate below (for individuals, Last name, First name, Middle name). If the advisory affiliate has a CRD number, provide that number. If not, indicate "non-registered" by checking the appropriate box.					
	ADV DRP - ADVISORY AFFILIATE					
	No Information Filed					
	☐ This DRP should be removed from the ADV record because the advisory affiliate(s) is no longer associated with the adviser. ☐ This DRP should be removed from the ADV record because: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an exempt reporting adviser with the SEC and the event was resolved in the adviser's or advisory affiliate's favor.					
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.H.(1)(a), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.					
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:					
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.					
	C Yes C No					
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.					
PAF	T II					
1.	Court Action initiated by: (Name of regulator, foreign financial regulatory authority, SRO, commodities exchange, agency, firm, private plaintiff, etc.) SABINE (CLIENT)					
2.	Principal Relief Sought: Other					
	Other Relief Sought:					
	VALUE OF ANNUITY \$60,271.00					
3.	Filing Date of Court Action (MM/DD/YYYY):					
	05/26/2000 Exact Explanation If not exact, provide explanation:					
4.	Principal Product Type:					
	Annuity(ies) - Variable Other Product Types:					
5.	Formal Action was brought in (include name of Federal, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case Number): CIRCUIT COURT OF TENNESSEE					
6.	Advisory Affiliate Employing Firm when activity occurred which led to the civil judicial action (if applicable): (INVEST FINANCIAL CORP.)					
7.	Describe the allegations related to this civil action (your response must fit within the space provided): ALLEGES THAT ANNUITY BENEFICIARY DESIGNATION WAS IMPROPER AND INCORRECT					
8.	Current Status? Pending On Appeal O Final					
9.	If on appeal, action appealed to (provide name of court) and Date Appeal Filed (MM/DD/YYYY):					
10.	If pending, date notice/process was served (MM/DD/YYYY):					
	05/26/2000 © Exact C Explanation					

If not exact, provide explanation:	
If Final or On Appeal, complete all items below. For Pending Actions,	complete Item 14 only.
11. How was matter resolved:	
 12. Resolution Date (MM/DD/YYYY): C Exact C Explanation If not exact, provide explanation: 	
13. Resolution Detail:	
Principal, etc.). If requalification by exam/retraining was a co	Disgorgement/Restitution Cease and Desist/Injunction Suspension duration including start date and capacities affected (General Securities Principal, Financial Operations and on the sanction, provide length of time given to requalify/retrain, type of exam required and whether a, penalty, restitution, disgorgement, or monetary compensation, provide total amount, portion levied against
provided).	s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space MPROPER AND INCORRECT FIRM DOES NOT BELIEVE THIS MATTER IS REQUIRED TO BE DISCLOSED AS WER TO 11H(1) A, B, OR C. PLEASE REMOVE.
art 2 Exemption from brochure delivery requirements for SEC-registered	d advisers
SEC rules exempt SEC-registered advisers from delivering a firm broc clients, you do not have to prepare a brochure.	chure to some kinds of clients. If these exemptions excuse you from delivering a brochure to <i>all</i> of your advisory Yes No
Are you exempt from delivering a brochure to all of your clients under t	
If no, complete the ADV Part 2 filing below.	
mend, retire or file new brochures:	
xecution Pages OMESTIC INVESTMENT ADVISER EXECUTION PAGE	

Ex

D

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint the Secretary of State or other legally designated officer, of the state in which you maintain your principal office and place of business and any other state in which you are submitting a notice filling, as your agents to receive service, and agree that such persons may accept service on your behalf, of any notice, subpoena, summons, order instituting proceedings, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative proceeding or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, proceeding, or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is founded, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of the state in which you maintain your principal office and place of business or of any state in which you are submitting a notice filing.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature: SANDRA WHITED

Printed Name: SANDRA WHITED

Adviser CRD Number:

12984

Date: MM/DD/YYYY 06/13/2018

Title:

1ST VP, CCO INVEST

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

1. Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint each of the Secretary of the SEC, and the Secretary of State or other legally designated officer, of any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such persons may accept service on your behalf, of any notice, subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding* or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of any state in which you are submitting a *notice filing*.

2. Appointment and Consent: Effect on Partnerships

If you are organized as a partnership, this irrevocable power of attorney and consent to service of process will continue in effect if any partner withdraws from or is admitted to the partnership, provided that the admission or withdrawal does not create a new partnership. If the partnership dissolves, this irrevocable power of attorney and consent shall be in effect for any action brought against you or any of your former partners.

3. Non-Resident Investment Adviser Undertaking Regarding Books and Records

By signing this Form ADV, you also agree to provide, at your own expense, to the U.S. Securities and Exchange Commission at its principal office in Washington D.C., at any Regional or District Office of the Commission, or at any one of its offices in the United States, as specified by the Commission, correct, current, and complete copies of any or all records that you are required to maintain under Rule 204-2 under the Investment Advisers Act of 1940. This undertaking shall be binding upon you, your heirs, successors and assigns, and any *person* subject to your written irrevocable consents or powers of attorney or any of your general partners and *managing agents*.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the *non-resident* investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature: Date: MM/DD/YYYY

Printed Name: Title:

Adviser CRD Number:

12984