



IAPD Report

KENNETH METVINER

CRD# 1178560

| <u>Section Title</u> | <u>Page(s)</u> |
|-------------------------------------|-----------------------|
| Report Summary | 1 |
| Qualifications | 2 - 3 |
| Registration and Employment History | 4 |
| Disclosure Information | 5 |



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

Please contact FINRA with any concerns.



IAPD Information About Representatives

IAPD offers information on all current-and many former representatives. Investors are strongly encouraged to use IAPD to check the background of representatives before deciding to conduct, or continue to conduct, business with them.

What is included in a IAPD report?

IAPD reports for individual representatives include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards.

It is important to note that the information contained in an IAPD report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

Where did this information come from?

The information contained in IAPD comes from the Investment Adviser Registration Depository (IARD) and FINRA's Central Registration Depository, or CRD, (see more on CRD below) and is a combination of:

- information the states require representatives and firms to submit as part of the registration and licensing process, and
- information that state regulators report regarding disciplinary actions or allegations against representatives.

How current is this information?

Generally, representatives are required to update their professional and disciplinary information in IARD within 30 days.

Need help interpreting this report?

For help understanding how to read this report, please consult NASAA's IAPD Tips page <http://www.nasaa.org/IAPD/IARReports.cfm>

What if I want to check the background of an Individual Broker or Brokerage Firm?

To check the background of an Individual Broker or Brokerage firm, you can search for the firm or individual in IAPD. If your search is successful, click on the link provided to view the available licensing and registration information in FINRA's BrokerCheck website.

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

It is recommended that you learn as much as possible about an individual representative or Investment Adviser firm before deciding to work with them. Your state securities regulator can help you research individuals and certain firms doing business in your state. The contact information for state securities regulators can be found on the website of the North American Securities Administrators Association <http://www.nasaa.org>



Report Summary

KENNETH METVINER (CRD# 1178560)

The report summary provides an overview of the representative's professional background and conduct. The information contained in this report has been provided by the representative, investment adviser and/or securities firms, and/or securities regulators as part of the states' investment adviser registration and licensing process. The information contained in this report was last updated by the representative, a previous employing firm, or a securities regulator on **12/14/2016**.

CURRENT EMPLOYERS

| | Firm | CRD# | Registered Since |
|----|---------------------------------|-------------|------------------|
| IA | SEACREST WEALTH MANAGEMENT, LLC | CRD# 147092 | 02/11/2015 |

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **1** jurisdiction(s).

Is this representative currently Inactive or Suspended with any regulator? **No**

Note: Not all jurisdictions require IAR registration or may have an exemption from registration.

Additional information including this individual's qualification examinations and professional designations is available in the Detailed Report.

REGISTRATION HISTORY

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

| | FIRM | CRD# | LOCATION | REGISTRATION DATES |
|----|---------------------------------|--------|-------------|-------------------------|
| B | MORGAN STANLEY SMITH BARNEY | 149777 | PARAMUS, NJ | 06/01/2009 - 05/03/2012 |
| IA | MORGAN STANLEY SMITH BARNEY LLC | 149777 | PARAMUS, NJ | 06/01/2009 - 05/03/2012 |
| IA | CITIGROUP GLOBAL MARKETS INC. | 7059 | PARAMUS, NJ | 05/08/2002 - 06/01/2009 |

For additional registration and employment history details as reported by the individual, refer to the Registration and Employment History section of the Detailed Report.

DISCLOSURE INFORMATION

Disclosure events include certain criminal charges and convictions, formal investigations and disciplinary actions initiated by regulators, customer disputes and arbitrations, and financial disclosures such as bankruptcies and unpaid judgments or liens.

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

The following types of events are disclosed about this representative:

| Type | Count |
|------------------|-------|
| Regulatory Event | 1 |
| Customer Dispute | 2 |
| Termination | 1 |



Qualifications

REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works. This individual is currently registered with **1** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **SEACREST WEALTH MANAGEMENT, LLC**
Main Address: 3000 WESTCHESTER AVENUE
SUITE 206
PURCHASE, NY 10577
Firm ID#: 147092

| Regulator | Registration | Status | Date |
|-------------------|-----------------------------------|----------|------------|
| IA Florida | Investment Adviser Representative | Approved | 04/19/2016 |

Branch Office Locations

SEACREST WEALTH MANAGEMENT, LLC
Kissimmee, FL



Qualifications

PASSED INDUSTRY EXAMS

This section includes all industry exams that the representative has passed. Under limited circumstances, a representative may attain registration after receiving an exam waiver based on a combination of exams the representative has passed and qualifying work experience. Likewise a new exam requirement may be grandfathered based on a representative's specific qualifying work experience. Exam waivers and grandfathering are not included below.

This individual has passed 0 principal/supervisory exams, 4 general industry/product exams, and 2 state securities law exams.





Principal/Supervisory Exams

| Exam | Category | Date |
|------|----------|------|
|------|----------|------|

No information reported.



General Industry/Product Exams

| Exam | Category | Date |
|------|----------|------|
|------|----------|------|

| | | |
|--|-----------|------------|
|  Foreign Currency Options Examination (S15) | Series 15 | 01/04/1984 |
|  Interest Rate Options Examination (S5) | Series 5 | 09/29/1983 |
|  National Commodity Futures Examination (S3) | Series 3 | 09/22/1983 |
|  General Securities Representative Examination (S7) | Series 7 | 09/17/1983 |

State Securities Law Exams

| Exam | Category | Date |
|------|----------|------|
|------|----------|------|

| | | |
|--|-----------|------------|
|  Uniform Investment Adviser Law Examination (S65) | Series 65 | 02/16/1994 |
|  Uniform Securities Agent State Law Examination (S63) | Series 63 | 09/26/1983 |

PROFESSIONAL DESIGNATIONS

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

No information reported.



Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

| | Registration Dates | Firm Name | ID# | Branch Location |
|----|-------------------------|---|-------------|-----------------|
| B | 06/01/2009 - 05/03/2012 | MORGAN STANLEY SMITH BARNEY | CRD# 149777 | PARAMUS, NJ |
| IA | 06/01/2009 - 05/03/2012 | MORGAN STANLEY SMITH BARNEY LLC | CRD# 149777 | PARAMUS, NJ |
| IA | 05/08/2002 - 06/01/2009 | CITIGROUP GLOBAL MARKETS INC. | CRD# 7059 | PARAMUS, NJ |
| B | 07/31/1993 - 06/01/2009 | CITIGROUP GLOBAL MARKETS INC. | CRD# 7059 | PARAMUS, NJ |
| B | 06/11/1992 - 07/31/1993 | LEHMAN BROTHERS INC. | CRD# 7506 | NEW YORK, NY |
| B | 05/25/1989 - 06/19/1992 | SMITH BARNEY, HARRIS UPHAM & CO., INCORPORATED | CRD# 7059 | NEW YORK, NY |
| B | 02/21/1989 - 04/07/1990 | DREXEL BURNHAM LAMBERT GOVERNMENT SECURITIES INC. | CRD# 19727 | |
| B | 09/23/1983 - 08/15/1989 | DREXEL BURNHAM LAMBERT INCORPORATED | CRD# 7323 | |

EMPLOYMENT HISTORY

Below is the representative's employment history for up to the last 10 years.

| Employment Dates | Employer Name | Position | Investment Related | Employer Location |
|-------------------|----------------------------|-----------------------------------|--------------------|-----------------------------|
| 06/2012 - Present | SEACREST WEALTH MANAGEMENT | INVESTMENT ADVISOR REPRESENTATIVE | Y | PURCHASE, NY, United States |

OTHER BUSINESS ACTIVITIES

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

No information reported.



Disclosure Summary

Disclosure Information

What you should know about reported disclosure events:

(1) Certain thresholds must be met before an event is reported to IARD, for example:

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

(2) Disclosure events in IAPD reports come from different sources:

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

(3) There are different statuses and dispositions for disclosure events:

- A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
 - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

(4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.



DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

| Type | Count |
|------------------|-------|
| Regulatory Event | 1 |
| Customer Dispute | 2 |
| Termination | 1 |

Regulatory Event

This disclosure event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a federal regulator such as the Securities and Exchange Commission or the Commodities Futures Trading Commission, or a foreign financial regulatory body) for a violation of investment-related rules or regulations. This disclosure event may also include a revocation or suspension of an Investment Adviser Representative's authority to act as an attorney, accountant or federal contractor.

Disclosure 1 of 1

| | |
|--|--|
| Reporting Source: | Regulator |
| Regulatory Action Initiated By: | FINRA |
| Sanction(s) Sought: | Other: N/A |
| Date Initiated: | 08/08/2012 |
| Docket/Case Number: | 2011026103901 |
| Employing firm when activity occurred which led to the regulatory action: | MORGAN STANLEY SMITH BARNEY |
| Product Type: | No Product |
| Allegations: | FINRA RULE 2010, NASD RULE 2510(B): METVINER EXERCISED DISCRETIONARY POWER IN SOME CUSTOMER ACCOUNTS, WHEN HE DID NOT HAVE WRITTEN AUTHORIZATION FROM THOSE CUSTOMERS TO PLACE DISCRETIONARY TRADES IN THOSE ACCOUNTS. MOREOVER, METVINER FAILED TO OBTAIN WRITTEN ACCEPTANCE OF THE ACCOUNTS AS DISCRETIONARY FROM HIS MEMBER FIRM. |
| Current Status: | Final |
| Resolution: | Acceptance, Waiver & Consent(AWC) |



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?

No

Resolution Date:

08/08/2012

Sanctions Ordered:

Civil and Administrative Penalty(ies)/Fine(s)
Suspension

If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?

No

(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?

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



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

Sanction 1 of 1

Sanction Type: Suspension
Capacities Affected: ANY CAPACITY
Duration: 10 BUSINESS DAYS
Start Date: 08/20/2012
End Date: 08/31/2012

Monetary Sanction 1 of 1

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

Payment Plan:

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Regulator Statement

WITHOUT ADMITTING OR DENYING THE FINDINGS, METVINER CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, HE IS FINED \$5,000 AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY FOR 10 BUSINESS DAYS. THE FINE IS DUE AND PAYABLE EITHER IMMEDIATELY UPON RE-ASSOCIATION WITH A MEMBER FIRM FOLLOWING HIS SUSPENSION OR PRIOR TO ANY APPLICATION OR REQUEST FOR RELIEF FROM ANY STATUTORY DISQUALIFICATION RESULTING FROM THIS OR ANY OTHER EVENT OR PROCEEDING, WHICHEVER IS EARLIER. THE SUSPENSION IS IN EFFECT FROM AUGUST 20, 2012, THROUGH AUGUST 31, 2012.

Reporting Source: Individual



| | |
|---|--|
| Regulatory Action Initiated By: | FINANCIAL INDUSTRY REGULATORY AUTHORITY |
| Sanction(s) Sought: | Suspension |
| Date Initiated: | 08/08/2012 |
| Docket/Case Number: | 2011026103901 |
| Employing firm when activity occurred which led to the regulatory action: | MORGAN STANLEY SMITH BARNEY |
| Product Type: | Other: RIGHTS |
| Allegations: | METVINER EXERCISED DISCRETIONARY POWER IN SOME CUSTOMER ACCOUNTS, WHEN HE DIDNOT HAVE WRITTEN AUTHORIZATION FROM THOSE CUSTOMERS TOPLACE DISCRETIONARY TRADES IN THOSE ACCOUNTS. |
| Current Status: | Final |
| Resolution: | Acceptance, Waiver & Consent(AWC) |
| Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? | Yes |
| Resolution Date: | 08/08/2012 |
| Sanctions Ordered: | Civil and Administrative Penalty(ies)/Fine(s) Suspension |
| Sanction 1 of 1 | |
| Sanction Type: | Suspension |
| Capacities Affected: | ALL CAPACITIES (10 DAYS) |
| Duration: | 10 DAYS |
| Start Date: | 08/20/2012 |
| End Date: | 08/31/2012 |
| Monetary Sanction 1 of 1 | |
| Monetary Related Sanction: | Civil and Administrative Penalty(ies)/Fine(s) |
| Total Amount: | \$5,000.00 |
| Portion Levied against individual: | \$5,000.00 |
| Payment Plan: | NONE |
| Is Payment Plan Current: | |
| Date Paid by individual: | 08/08/2012 |
| Was any portion of penalty waived? | Yes |
| Amount Waived: | \$5,000.00 |
| Broker Statement | MR. METVINER PRIMARILY SERVICED HIS CLIENTS IN FEE-BASED |



ACCOUNTS WITH DISCRETIONARY AUTHORITY OVER THE ACCOUNTS. FOR APPROXIMATELY FIVE CLIENTS, THERE WERE VERY SMALL RIGHTS OFFERINGS IN THE CLIENTS' TRANSACTIONAL ACCOUNTS AT MSSB THAT MR. METVINER ASSUMED DISCRETION TO HAVE THE RIGHTS EXERCISED AND CREDITED TO THE RESPECTIVE CLIENT ACCOUNTS. THE DOLLAR VALUE OF THESE TRANSACTIONS WERE DE MINIMIS (AT APPROXIMATELY \$300 EXERCISED VALUE). MR. METVINER CLEARLY EXECUTED THESE TRADES TO ASSIST THE CLIENTS AND NOT FOR FINANCIAL GAIN. AT THE TIME, HE WAS NOT AWARE THAT SUCH ACTION WOULD BE A COMPLIANCE VIOLATION AND THOUGHT HE WAS ADMINISTRATIVELY ASSISTING CLIENTS BY CLEANING UP THEIR ACCOUNTS. AS A RESULT OF THIS INCIDENT, MR. METVINER DECIDED THAT THE CONFLICTS OF INTEREST ASSOCIATED WITH ASSOCIATION WITH A BROKER-DEALER WAS NOT IN THE BEST INTERESTS OF HIS CLIENTS AND DECIDED AGAINST NEGOTIATING TO REMAIN WITH ANY FINRA MEMBER FIRM. MR. METVINER SIGNED THE ACCEPTANCE, WAIVER, AND CONSENT WITH FINRA TO CLOSE THIS MATTER. THE FINE IS NOT PAYABLE UNLESS MR. METVINER WERE TO AFFILIATE WITH A BROKER-DEALER FOR COMMISSION BUSINESS. MR. METVINER INTENDS TO ONLY PROVIDE CONFLICT-FREE ADVICE ON A FEE-ONLY BASIS UNDER A REGISTERED INVESTMENT ADVISOR.



Customer Dispute

This section provides information regarding a customer dispute that was reported to the Investment Adviser Registration Depository (IARD) by the Investment Adviser Representative (IAR), an investment adviser and/or securities firm, and/or a securities regulator. The event may include a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit that contains allegations of sales practice violations against the individual.

The customer dispute may be pending or may have resulted in a civil judgment, arbitration award, monetary settlement, closure without action, withdrawal, dismissal, denial, or other outcome.

Disclosure 1 of 2

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: CITIGROUP GLOBAL MARKETS INC.

Allegations: CLAIMANT ALLEGES, INTER ALIA, THAT FROM NOVEMBER OF 2001 THROUGH MARCH OF 2009 THE FINANCIAL ADVISOR ENGAGED IN UNAUTHORIZED AND EXCESSIVE TRADING IN THE CLAIMANT'S ACCOUNT.

Product Type: Equity Listed (Common & Preferred Stock)

Alleged Damages: \$295,056.00

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation? No

Customer Complaint Information

Date Complaint Received: 05/07/2009

Complaint Pending? No

Status: Evolved into Arbitration/CFTC reparation (the individual is a named party)

Status Date: 03/09/2010

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA

Docket/Case #: 10-00576

Date Notice/Process Served: 03/09/2010

Arbitration Pending? No

Disposition: Settled

Disposition Date: 04/20/2011

Monetary Compensation Amount: \$60,000.00

Individual Contribution Amount: \$0.00



Firm Statement THIS MATTER WAS SETTLED FOR BUSINESS PURPOSES, WITH NO ADMISSION OF LIABILITY BY THE FIRM OR BROKER. BROKER DID NOT CONTRIBUTE TO SETTLEMENT.

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: CITIGROUP GLOBAL MARKETS INC.

Allegations: CLAIMANT ALLEGES, INTER ALIA, THAT FROM NOVEMBER OF 2001 THROUGH MARCH OF 2009 THE FINANCIAL ADVISOR ENGAGED IN UNAUTHORIZED AND EXCESSIVE TRADING IN THE CLAIMANT'S ACCOUNT.

Product Type: Equity Listed (Common & Preferred Stock)

Alleged Damages: \$295,056.00

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation? No

Customer Complaint Information

Date Complaint Received: 05/07/2009

Complaint Pending? No

Status: Evolved into Arbitration/CFTC reparation (the individual is a named party)

Status Date: 03/09/2010

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA

Docket/Case #: 10-00576

Date Notice/Process Served: 03/09/2010

Arbitration Pending? No

Disposition: Settled

Disposition Date: 04/20/2011

Monetary Compensation Amount: \$60,000.00

Individual Contribution Amount: \$0.00

Broker Statement THIS MATTER WAS SETTLED FOR BUSINESS PURPOSES, WITH NO ADMISSION OF LIABILITY BY THE FIRM OR BROKER. BROKER DID NOT CONTRIBUTE TO SETTLEMENT.



Disclosure 2 of 2

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: SALOMON SMITH BARNEY

Allegations: UNSUITABILITY, BREACH OF FIDUCIARY DUTY, MISREPRESENTATION AND NEGLIGENCE INVOLVING A MANAGED ACCOUNT. TIME PERIOD: 1/2000 TO 2/2001.

Product Type: Equity Listed (Common & Preferred Stock)

Alleged Damages: \$130,000.00

Customer Complaint Information

Date Complaint Received: 05/20/2002

Complaint Pending? No

Status: Denied

Status Date: 08/08/2002

Settlement Amount:

Individual Contribution Amount:

Broker Statement REQUEST FOR MEDIATION RECEIVED ON 3/4/03
SALOMON SMITH BARNEY IN LOOKING INTO THIS MATTER.



Termination

This disclosure event involves a situation where the Investment Adviser Representative voluntarily resigned, was discharged or was permitted to resign after allegations were made that accused the Investment Adviser Representative of violating investment-related statutes, regulations, rules or industry standards of conduct; fraud or the wrongful taking of property; or failure to supervise in connection with investment-related statutes, regulations, rules or industry standards of conduct.

Disclosure 1 of 1

| | |
|--------------------------|---|
| Reporting Source: | Firm |
| Firm Name: | MSSB |
| Termination Type: | Discharged |
| Termination Date: | 04/03/2012 |
| Allegations: | MANAGEMENT LOSS OF CONFIDENCE REGARDING REGISTERED REPRESENTATIVE'S EXERCISE OF DISCRETION IN CLIENT ACCOUNTS |
| Product Type: | No Product |



End of Report

This page is intentionally left blank.