



## IAPD Report

# JON RICHARD ADAMS

CRD# 1255111

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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

### JON RICHARD ADAMS (CRD# 1255111)

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 **11/04/2024**.

### CURRENT EMPLOYERS

|           | Firm   | CRD#      | Registered Since |
|-----------|--|-----------|------------------|
| <b>B</b>  | MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED | CRD# 7691 | 02/03/1995       |
| <b>IA</b> | MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED | CRD# 7691 | 06/12/2009       |

### QUALIFICATIONS

This representative is currently registered in **6** SRO(s) and **53** 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>B</b> | PRUDENTIAL SECURITIES INCORPORATED | 7471 | NEW YORK, NY | 08/15/1990 - 02/14/1995 |
| <b>B</b> | LEHMAN BROTHERS INC.               | 7506 | NEW YORK, NY | 04/11/1988 - 08/29/1990 |
| <b>B</b> | E. F. HUTTON & COMPANY INC         | 235  | NEW YORK, NY | 07/09/1987 - 04/11/1988 |

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 |
|------------------|-------|
| Customer Dispute | 4     |



## 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 **53** jurisdiction(s) and 6 SRO(s) through his or her employer(s).

### Employment 1 of 1

Firm Name: **MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED**  
Main Address: ONE BRYANT PARK  
NEW YORK, NY 10036  
Firm ID#: 7691

| Regulator                        | Registration                        | Status   | Date       |
|----------------------------------|-------------------------------------|----------|------------|
| <b>B</b> Cboe BYX Exchange, Inc. | General Securities Representative   | Approved | 05/12/2014 |
| <b>B</b> Cboe BZX Exchange, Inc. | General Securities Representative   | Approved | 05/12/2014 |
| <b>B</b> Cboe Exchange, Inc.     | General Securities Representative   | Approved | 02/03/1995 |
| <b>B</b> Cboe Exchange, Inc.     | General Securities Sales Supervisor | Approved | 06/27/2016 |
| <b>B</b> FINRA                   | General Securities Representative   | Approved | 02/03/1995 |
| <b>B</b> FINRA                   | General Securities Sales Supervisor | Approved | 06/27/2016 |
| <b>B</b> Nasdaq Stock Market     | General Securities Representative   | Approved | 07/12/2006 |
| <b>B</b> Nasdaq Stock Market     | General Securities Sales Supervisor | Approved | 06/27/2016 |
| <b>B</b> New York Stock Exchange | General Securities Representative   | Approved | 02/03/1995 |
| <b>B</b> New York Stock Exchange | General Securities Sales Supervisor | Approved | 10/01/2018 |
| <b>B</b> Alabama                 | Agent                               | Approved | 10/04/2005 |
| <b>B</b> Alaska                  | Agent                               | Approved | 05/17/2016 |
| <b>B</b> Arizona                 | Agent                               | Approved | 05/24/2016 |



### Qualifications

| Regulator                     | Registration | Status   | Date       |
|-------------------------------|--------------|----------|------------|
| <b>B</b> Arkansas             | Agent        | Approved | 05/19/2016 |
| <b>B</b> California           | Agent        | Approved | 02/26/1998 |
| <b>B</b> Colorado             | Agent        | Approved | 10/23/2009 |
| <b>B</b> Connecticut          | Agent        | Approved | 09/10/2014 |
| <b>B</b> Delaware             | Agent        | Approved | 06/01/2016 |
| <b>B</b> District of Columbia | Agent        | Approved | 06/19/2001 |
| <b>B</b> Florida              | Agent        | Approved | 02/03/1995 |
| <b>B</b> Georgia              | Agent        | Approved | 01/10/2008 |
| <b>B</b> Hawaii               | Agent        | Approved | 05/17/2016 |
| <b>B</b> Idaho                | Agent        | Approved | 05/19/2016 |
| <b>B</b> Illinois             | Agent        | Approved | 03/26/2004 |
| <b>B</b> Indiana              | Agent        | Approved | 05/18/2016 |
| <b>B</b> Iowa                 | Agent        | Approved | 05/17/2016 |
| <b>B</b> Kansas               | Agent        | Approved | 06/08/2016 |
| <b>B</b> Kentucky             | Agent        | Approved | 02/03/2016 |
| <b>B</b> Louisiana            | Agent        | Approved | 05/17/2016 |
| <b>B</b> Maine                | Agent        | Approved | 04/04/2005 |
| <b>B</b> Maryland             | Agent        | Approved | 02/03/1995 |
| <b>B</b> Massachusetts        | Agent        | Approved | 08/19/1996 |



## Qualifications

|    | Regulator      | Registration                      | Status   | Date       |
|----|----------------|-----------------------------------|----------|------------|
| B  | Michigan       | Agent                             | Approved | 08/11/2011 |
| B  | Minnesota      | Agent                             | Approved | 05/23/2016 |
| B  | Mississippi    | Agent                             | Approved | 06/17/2016 |
| B  | Missouri       | Agent                             | Approved | 05/17/2016 |
| B  | Montana        | Agent                             | Approved | 05/18/2016 |
| B  | Nebraska       | Agent                             | Approved | 05/20/2016 |
| B  | Nevada         | Agent                             | Approved | 12/17/2012 |
| B  | New Hampshire  | Agent                             | Approved | 03/08/2007 |
| B  | New Jersey     | Agent                             | Approved | 06/07/2001 |
| B  | New Mexico     | Agent                             | Approved | 03/07/2013 |
| B  | New York       | Agent                             | Approved | 07/30/1996 |
| B  | North Carolina | Agent                             | Approved | 07/03/2001 |
| B  | North Dakota   | Agent                             | Approved | 05/18/2016 |
| B  | Ohio           | Agent                             | Approved | 03/06/2008 |
| B  | Oklahoma       | Agent                             | Approved | 05/18/2016 |
| B  | Oregon         | Agent                             | Approved | 02/10/2010 |
| B  | Pennsylvania   | Agent                             | Approved | 02/03/1995 |
| IA | Pennsylvania   | Investment Adviser Representative | Approved | 06/22/2010 |
| B  | Puerto Rico    | Agent                             | Approved | 06/06/2016 |



### Qualifications

| Regulator               | Registration                      | Status              | Date       |
|-------------------------|-----------------------------------|---------------------|------------|
| <b>B</b> Rhode Island   | Agent                             | Approved            | 09/10/2014 |
| <b>B</b> South Carolina | Agent                             | Approved            | 10/23/2013 |
| <b>B</b> South Dakota   | Agent                             | Approved            | 05/17/2016 |
| <b>B</b> Tennessee      | Agent                             | Approved            | 10/29/2015 |
| <b>B</b> Texas          | Agent                             | Approved            | 03/27/2009 |
| <b>IA</b> Texas         | Investment Adviser Representative | Restricted Approval | 06/12/2009 |
| <b>B</b> Utah           | Agent                             | Approved            | 05/18/2016 |
| <b>B</b> Vermont        | Agent                             | Approved            | 05/17/2016 |
| <b>B</b> Virgin Islands | Agent                             | Approved            | 05/27/2016 |
| <b>B</b> Virginia       | Agent                             | Approved            | 02/03/1995 |
| <b>B</b> Washington     | Agent                             | Approved            | 01/24/2007 |
| <b>B</b> West Virginia  | Agent                             | Approved            | 06/02/2016 |
| <b>B</b> Wisconsin      | Agent                             | Approved            | 05/18/2016 |
| <b>B</b> Wyoming        | Agent                             | Approved            | 04/27/2004 |

### Branch Office Locations

**MERRILL LYNCH, PIERCE, FENNER & SMITH  
INCORPORATED**  
96 S GEORGE ST  
YORK, PA 17401



## 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 3 principal/supervisory exams, 3 general industry/product exams, and 2 state securities law exams.**

#### Principal/Supervisory Exams

| Exam   | Category  | Date       |
|--|-----------|------------|
| General Securities Sales Supervisor - General Module Examination (S10)                 | Series 10 | 06/27/2016 |
| General Securities Sales Supervisor - Options Module Examination (S9)                  | Series 9  | 06/06/2016 |
| General Securities Sales Supervisor Examination (Options Module & General Module) (S8) | Series 8  | 03/20/1995 |

#### General Industry/Product Exams

| Exam   | Category | Date       |
|--|----------|------------|
| Securities Industry Essentials Examination (SIE)   | SIE      | 10/01/2018 |
| National Commodity Futures Examination (S3)        | Series 3 | 11/11/1993 |
| General Securities Representative Examination (S7) | Series 7 | 08/18/1984 |

#### State Securities Law Exams

| Exam   | Category  | Date       |
|--|-----------|------------|
| Uniform Investment Adviser Law Examination (S65)     | Series 65 | 06/11/2010 |
| Uniform Securities Agent State Law Examination (S63) | Series 63 | 08/28/1984 |

### 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 | 08/15/1990 - 02/14/1995 | PRUDENTIAL SECURITIES INCORPORATED                 | CRD# 7471 | NEW YORK, NY    |
| B | 04/11/1988 - 08/29/1990 | LEHMAN BROTHERS INC.                               | CRD# 7506 | NEW YORK, NY    |
| B | 07/09/1987 - 04/11/1988 | E. F. HUTTON & COMPANY INC                         | CRD# 235  |                 |
| B | 09/24/1984 - 07/09/1987 | MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED | CRD# 7691 |                 |

### 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       |
|-------------------|--|---------------------------|--------------------|-------------------------|
| 12/2009 - Present | BANK OF AMERICA, N.A.                              | WEALTH MANAGEMENT ADVISOR | Y                  | YORK, PA, United States |
| 02/1995 - Present | MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED | WEALTH MANAGEMENT ADVISOR | Y                  | YORK, PA, 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.

I\*44941  
 FOR PROFIT OR NOT FOR PROFIT: NON-PROFIT ORGANIZATION  
 NAME OF OUTSIDE BUSINESS ORGANIZATION: HEATHER BAKER FOUNDATION  
 INVESTMENT RELATED: N  
 ADDRESS OF BUSINESS:  
 SPRIN GROVE, PENNSYLVANIA 17362  
 NATURE OF BUSINESS: CHARITABLE ORGANIZATION,  
 POSITION, TITLE, ASSOCIATION: DIRECTOR,  
 START DATE OF RELATIONSHIP: 6/1/2010  
 NUMBER OF HOURS DEVOTED: 30 HOUR(S) ANNUALLY  
 NUMBER OF HOURS DEVOTED DURING TRADING HOURS: 0  
 DUTIES: RAISE MONEY AND AWARENESS OF FAMILIES WITH CANCER IN MEMORY OF HEATHER BAKER  
 I\*118385

For profit or not for profit: Non-Profit Organization  
 Name of outside business organization: The Salvation Army-York Citadel



## Registration & Employment History



### OTHER BUSINESS ACTIVITIES

Investment related: N

Address of business:

York, Pennsylvania 17401

Nature of business: Charitable Organization,

Position, title, association: Advisory Board Member,

Start date of relationship: 10/19/2018

Number of hours devoted: 20 hour(s) Annually

Number of hours devoted during trading hours: 0

Duties: serve on the advisory Board of the York Citadel of the Salvation Army. The mission of The Salvation Army is to preach the gospel of Jesus Christ and to meet human needs in His name without discrimination. I will also serve on th programs committee.



## 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 |
|------------------|-------|
| Customer Dispute | 4     |

### 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 4

|  |  |
|--|--|
| <b>Reporting Source:</b>   | Individual   |
| <b>Employing firm when activities occurred which led to the complaint:</b> | MERRILL LYNCH  |
| <b>Allegations:</b>  | CLAIMANTS ALLEGE UNSUITABILITY BY FINANCIAL CONSULTANT REGARDING THE PURCHASE OF "COMSTOCK PARTNERS" STOCK. CLAIMANTS CLAIM A LOSS OF \$27,389.24. |
| <b>Product Type:</b>   | Equity Listed (Common & Preferred Stock)   |
| <b>Other Product Type(s):</b>  | MUTUAL FUNDS   |
| <b>Alleged Damages:</b>  | \$27,389.24  |

### Customer Complaint Information

|  |                        |
|--|------------------------|
| <b>Date Complaint Received:</b>        | 11/03/1999             |
| <b>Complaint Pending?</b>              | No                     |
| <b>Status:</b>                         | Arbitration/Reparation |
| <b>Status Date:</b>                    | 11/03/1999             |
| <b>Settlement Amount:</b>              | \$0.00                 |
| <b>Individual Contribution Amount:</b> | \$0.00                 |

### Arbitration Information

|   |                 |
|---|-----------------|
| <b>Arbitration/Reparation Claim filed with and Docket/Case No.:</b> | NASD # 99-03946 |
|---|-----------------|



**Date Notice/Process Served:** 11/03/1999  
**Arbitration Pending?** No  
**Disposition:** Settled  
**Disposition Date:** 03/09/2000  
**Monetary Compensation Amount:** \$22,500.00  
**Individual Contribution Amount:** \$11,250.00  
**Broker Statement** THE ALLEGATIONS ARE DENIED. MERRILL LYNCH SETTLED THE MATTER TO AVOID THE EXPENSES AND UNCERTAINTY OF LITIGATION.

#### Disclosure 2 of 4

**Reporting Source:** Individual  
**Employing firm when activities occurred which led to the complaint:** MERRILL LYNCH  
**Allegations:** CLAIMANT ALLEGES FAILURE ADEQUATELY TO SUPERVISE FINANCIAL CONSULTANTS WHO ENGAGED IN ACTS OF FRAUD, MISREPRESENTATION, AND NEGLIGENCE REGARDING THE PURCHASE OF SECURITIES.  
**Product Type:** Equity - OTC  
**Alleged Damages:** \$7,000,000.00

#### Customer Complaint Information

**Date Complaint Received:** 04/23/1999  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:** 07/27/2000  
**Settlement Amount:** \$175,000.00  
**Individual Contribution Amount:** \$0.00

#### Arbitration Information

**Arbitration/Reparation Claim filed with and Docket/Case No.:** NASD; 99-00373  
**Date Notice/Process Served:** 04/23/1999  
**Arbitration Pending?** No  
**Disposition:** Withdrawn  
**Disposition Date:** 07/27/2000  
**Monetary Compensation Amount:** \$175,000.00  
**Individual Contribution Amount:** \$0.00  
**Broker Statement** ALL CLAIMS AGAINST JON ADAMS WERE WITHDRAWN BY THE CLAIMANT.

**Disclosure 3 of 4**

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** MERRILL LYNCH

**Allegations:** CLAIMANTS ALLEGE UNSUITABILITY AND POOR RECOMMENDATION BY FINANCIAL CONSULTANT IN REGARD TO THE PURCHASE OF "COMSTOCK PARTNERS". CLAIMANTS ALLEGE A LOSS IN THE AMOUNT OF \$36,492.07 PLUS INTEREST, PUNITIVE AND TREBLE DAMAGES.

**Product Type:** Mutual Fund(s)

**Alleged Damages:** \$36,492.07

**Customer Complaint Information**

**Date Complaint Received:** 09/18/1998

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 09/01/1999

**Settlement Amount:** \$35,000.00

**Individual Contribution Amount:** \$0.00

**Arbitration Information**

**Arbitration/Reparation Claim filed with and Docket/Case No.:** NATIONAL ASSOCIATION OF SECURITIES DEALERS; 98-02922

**Date Notice/Process Served:** 09/18/1998

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 09/01/1998

**Monetary Compensation Amount:** \$35,000.00

**Individual Contribution Amount:** \$0.00

**Broker Statement** MERRILL LYNCH AND JON R. ADAMS MAINTAIN THAT COMSTOCK PARTNERS, A MUTUAL FUND, WAS A SUITABLE INVESTMENTS FOR THE CLAIMANTS. UNFORTUNATELY, COMSTOCK PARTNERS DID NOT PERFORM AS CLAIMANTS EXPECTED. THE MATTER WAS SETTLED TO AVOID ADDITIONAL COSTS OF DEFENSE AND TO AVOID THE VAGARIES OF LITIGATION.

**Disclosure 4 of 4**

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED



**Allegations:** CUSTOMER ALLEGED THAT THE COMSTOCK PARTNERS CAPITAL VALUE FUND WAS UNSUITABLE FOR THE EDUCATIONAL TRUST FUND ACCOUNT. CUSTOMER ALLEGED THAT THE EDUCATIONAL TRUST FUND LOST APPROXIMATELY \$25,000 DURING A FIVE YEAR PERIOD. THIS OCCURRED AT MERRILL LYNCH.

**Product Type:**

**Alleged Damages:** \$25,000.00

**Customer Complaint Information**

**Date Complaint Received:** 08/19/1998

**Complaint Pending?** No

**Status:** Denied

**Status Date:**

**Settlement Amount:**

**Individual Contribution Amount:**

**Broker Statement**

MERRILL LYNCH FOUND THAT THE COMSTOCK PARTNERS CAPITAL VALUE FUND WAS A SUITABLE INVESTMENT FOR THE EDUCATIONAL TRUST FUND ACCOUNT. THE OBJECTIVE OF THE COMSTOCK PARTNERS CAPITAL VALUE FUND WAS TO MAXIMIZE TOTAL RETURN, CONSISTENT WITH THE EDUCATIONAL TRUST FUND'S INVESTMENT OBJECTIVE OF GROWTH WITH MODERATE RISK.  
NOT PROVIDED



## End of Report

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