



IAPD Report

EDWARD ANDERSON GRISWOLD

CRD# 1854095

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Qualifications	2 - 6
Registration and Employment History	7
Disclosure Information	8



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

EDWARD ANDERSON GRISWOLD (CRD# 1854095)

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 **10/22/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	RBC CAPITAL MARKETS, LLC	CRD# 31194	03/09/2002
IA	RBC CAPITAL MARKETS, LLC	CRD# 31194	11/04/2003

QUALIFICATIONS

This representative is currently registered in **22** SRO(s) and **39** 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	TUCKER ANTHONY INCORPORATED	837	BOSTON, MA	05/11/2000 - 03/09/2002
B	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	7691	NEW YORK, NY	10/17/1988 - 02/02/2000

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	3
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 **39** jurisdiction(s) and 22 SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **RBC CAPITAL MARKETS, LLC**
Main Address: 200 VESEY ST.
NEW YORK, NY 10281
Firm ID#: 31194

Regulator	Registration	Status	Date
B BOX Exchange LLC	General Securities Representative	Approved	05/11/2012
B Cboe BYX Exchange, Inc.	General Securities Representative	Approved	11/18/2020
B Cboe BZX Exchange, Inc.	General Securities Representative	Approved	11/18/2020
B Cboe C2 Exchange, Inc.	General Securities Representative	Approved	11/18/2020
B Cboe EDGA Exchange, Inc.	General Securities Representative	Approved	11/18/2020
B Cboe EDGX Exchange, Inc.	General Securities Representative	Approved	11/18/2020
B Cboe Exchange, Inc.	General Securities Representative	Approved	03/09/2002
B FINRA	General Securities Representative	Approved	03/09/2002
B Investors' Exchange LLC	General Securities Representative	Approved	11/18/2020
B Long-Term Stock Exchange, Inc.	General Securities Representative	Approved	11/01/2020
B MEMX LLC	General Securities Representative	Approved	11/01/2020
B MIAX PEARL, LLC	General Securities Representative	Approved	11/01/2020
B NYSE American LLC	General Securities Representative	Approved	03/09/2002



Qualifications

Regulator	Registration	Status	Date
B NYSE Arca, Inc.	General Securities Representative	Approved	03/09/2002
B NYSE National, Inc.	General Securities Representative	Approved	11/18/2020
B NYSE Texas, Inc.	General Securities Representative	Approved	11/18/2020
B Nasdaq GEMX, LLC	General Securities Representative	Approved	11/18/2020
B Nasdaq ISE, LLC	General Securities Representative	Approved	03/01/2008
B Nasdaq PHLX LLC	General Securities Representative	Approved	03/01/2008
B Nasdaq Stock Market	General Securities Representative	Approved	07/12/2006
B Nasdaq Texas, LLC	General Securities Representative	Approved	01/13/2009
B New York Stock Exchange	General Securities Representative	Approved	03/09/2002
B Arizona	Agent	Approved	03/09/2002
B Arkansas	Agent	Approved	05/06/2020
B California	Agent	Approved	03/09/2002
IA California	Investment Adviser Representative	Approved	10/11/2005
B Colorado	Agent	Approved	07/09/2013
B Connecticut	Agent	Approved	03/09/2002
B Delaware	Agent	Approved	11/03/2011
B District of Columbia	Agent	Approved	10/18/2013
B Florida	Agent	Approved	03/09/2002
B Georgia	Agent	Approved	03/09/2002



Qualifications

	Regulator	Registration	Status	Date
B	Hawaii	Agent	Approved	05/24/2013
B	Idaho	Agent	Approved	05/09/2019
B	Illinois	Agent	Approved	03/09/2002
B	Kentucky	Agent	Approved	03/09/2002
B	Maine	Agent	Approved	04/03/2006
B	Maryland	Agent	Approved	03/09/2002
B	Massachusetts	Agent	Approved	03/09/2002
B	Michigan	Agent	Approved	03/09/2002
B	Minnesota	Agent	Approved	02/27/2007
B	Missouri	Agent	Approved	06/19/2014
B	Montana	Agent	Approved	10/29/2009
B	Nevada	Agent	Approved	11/05/2007
B	New Hampshire	Agent	Approved	03/09/2002
B	New Jersey	Agent	Approved	03/09/2002
B	New York	Agent	Approved	03/09/2002
B	North Carolina	Agent	Approved	03/09/2002
B	Ohio	Agent	Approved	03/24/2006
B	Oregon	Agent	Approved	12/09/2010
B	Pennsylvania	Agent	Approved	03/09/2002



Qualifications

Regulator	Registration	Status	Date
B Puerto Rico	Agent	Approved	04/29/2021
B Rhode Island	Agent	Approved	03/09/2002
B South Carolina	Agent	Approved	08/15/2014
B Tennessee	Agent	Approved	09/09/2014
B Texas	Agent	Approved	03/09/2002
IA Texas	Investment Adviser Representative	Restricted Approval	02/05/2015
B Utah	Agent	Approved	10/23/2017
B Vermont	Agent	Approved	06/25/2009
B Virginia	Agent	Approved	03/09/2002
B Washington	Agent	Approved	02/06/2007
B Wisconsin	Agent	Approved	04/02/2002
B Wyoming	Agent	Approved	07/19/2004

Branch Office Locations

RBC CAPITAL MARKETS, LLC
57 RIVER STREET
SUITE 102
WELLESLEY HILLS, MA 02481-2050

RBC CAPITAL MARKETS, LLC
Wellesley, MA



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, 2 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
------	----------	------

Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
General Securities Representative Examination (S7)	Series 7	07/16/1988

State Securities Law Exams

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

Uniform Investment Adviser Law Examination (S65)	Series 65	10/17/1994
Uniform Securities Agent State Law Examination (S63)	Series 63	12/06/1988

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	05/11/2000 - 03/09/2002	TUCKER ANTHONY INCORPORATED	CRD# 837	BOSTON, MA
B	10/17/1988 - 02/02/2000	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	NEW YORK, NY

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
05/2018 - Present	City National Bank	Employee of an affiliate	Y	Wellesley Hills, MA, United States
03/2008 - Present	RBC CAPITAL MARKETS, LLC	FINANCIAL ADVISOR	Y	WELLESLEY HILLS, MA, 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.

(1) NAME OF ENTITY: Rental Property
 ADDRESS: Private Residence
 INVESTMENT/NOT INVESTMENT RELATED: No
 BUSINESS DESCRIPTION: Rental Property
 START DATE: Sep 05, 2024
 CAPACITY: Owner
 DUTIES: Owning my mother's townhouse in CT
 HOURS DEVOTED PER MONTH: 0 - 4
 HOURS DEVOTED DURING SECURITIES HOURS PER MONTH: 0 - 4



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	3
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 3

Reporting Source: Regulator
Regulatory Action Initiated By: FLORIDA DIVISION OF SECURITIES

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 02/28/2000

Docket/Case Number: 3035-S-11/00

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

Product Type: No Product

Other Product Type(s):

Allegations: THE DEPARTMENT HAS ALLOWED GRISWOLD TO WITHDRAW HIS APPLICATION TO REGISTER AS AN ASSOCIATED PERSON OF TUCKER ANTHONY. FLORIDA DECLINED TO APPROVE HIS APPLICATION BASED ON HIS REGULATORY HISTORY.

Current Status: Final

Resolution: Stipulation and Consent

Resolution Date: 12/28/2000

Sanctions Ordered:



Other Sanctions Ordered: GRISWOLD AGREE TO WITHDRAW HIS APPLICATION UNTIL 1/1/2002. AFTER THAT PERIOD, THE DEPARTMENT MAY REGISTER GRISWOLD PURSUANT TO A REGISTRATION AGREEMENT.

Sanction Details: THE FUTURE REGISTRATION AGREEMENT WILL REMAIN IN FORCE FOR A PERIOD OF NOT LESS THAN TWO YEARS.

Regulator Statement NA

Reporting Source: Individual

Regulatory Action Initiated By: FLORIDA DIVISION OF SECURITIES

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 02/28/2000

Docket/Case Number: 3035-S-11/00

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

Product Type: No Product

Other Product Type(s):

Allegations: THE DEPARTMENT HAS ALLOWED GRISWOLD TO WITHDRAW HIS APPLICATION TO REGISTER AS AN ASSOCIATED PERSON OF TUCKER ANTHONY. FLORIDA DECLINED TO APPROVE HIS APPLICATION BASED ON HIS REGULATORY HISTORY.

Current Status: Final

Resolution: Stipulation and Consent

Resolution Date: 12/28/2000

Sanctions Ordered:

Other Sanctions Ordered: GRISWOLD AGREED TO WITHDRAW HIS APPLICATION UNTIL 1/1/2002. AFTER THAT PERIOD, THE DEPARTMENT MAY REGISTER GRISWOLD PURSUANT TO A REGISTRATION AGREEMENT.

Sanction Details: THE FUTURE REGISTRATION AGREEMENT WILL REMAIN IN FORCE FOR A PERIOD OF NOT LESS THAN TWO YEARS.

Broker Statement PLEASE NOTE: I HAVE RECEIVED THE NEW DISCLOSURE QUESTIONS 14D2 (A) & (B) AND BELIEVE THIS ACTION IS NOT RESPONSIVE TO THESE NEW QUESTIONS. SPECIFICALLY I WAS NOT "BARRED" FROM ANY ASSOCIATION WITH AN ENTITY REGULATED BY A STATE AUTHORITY THAT SUPERVISES OR EXAMINES BANKS, SAVING ASSOCIATES, OR CREDIT UNIONS, STATE INSURANCE COMMISSION. FURTHER MORE, THE UNDERLYING FACTS DO NOT REFERENCE ALLEGATION OF "FRAUDULENT MANIPULATIVE OR DECEPTIVE CONDUCT" AS I UNDERSTAND THESE TERMS.

Disclosure 2 of 3

Reporting Source: Regulator

Regulatory Action Initiated By: MASSACHUSETTS SECURITIES DIVISION



Sanction(s) Sought:	Other
Other Sanction(s) Sought:	CONDITIONAL REGISTRATION
Date Initiated:	05/23/2000
Docket/Case Number:	R-00-53
Employing firm when activity occurred which led to the regulatory action:	MERRILL LYNCH
Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Allegations:	<p>A) MERRILL LYNCH CONDUCTED AN INTERNAL INVESTIGATION OF GRISWOLD REGARDING A NASDAQ NATIONAL MARKET STOCK, WHICH RESULTED IN INTERNAL SANCTIONS THAT INCLUDED A LETTER OF CENSURE, A \$10,000 FINE AND REVERSAL OF CERTAIN PRODUCTION CREDITS FOR JANUARY 1997; B) ON JANUARY 3, 2000, MERRILL LYNCH TERMINATED GRISWOLD FOR EFFECTING A TRANSACTION IN A CUSTOMER'S ACCOUNT BY THE CUSTOMER'S HUSBAND WHEN THERE WAS NO WRITTEN AUTHORIZATION ON FILE; C) IN MAY 1997, UPON NOTICE OF MERRILL LYNCH'S INTERNAL INVESTIGATION, THE NEW YORK STOCK EXCHANGE (THE "NYSE") CONDUCTED AN INVESTIGATION OF GRISWOLD THAT RESULTED IN THE IMPOSITION OF A CENSURE, A \$50,000 FINE, AND A TWO MONTH SUSPENSION. THE ALLEGATIONS AGAINST GRISWOLD RAISE CONCERNS THAT NECESSITATE THAT THE DIVISION PLACE CONDITIONS ON HIS REGISTRATION AS AN AGENT OF TAI.</p>
Current Status:	Final
Resolution:	Consent
Resolution Date:	07/28/2000
Sanctions Ordered:	
Other Sanctions Ordered:	<p>GRISWOLD'S APPLICATION FOR REGISTRATION AS AN AGENT FOR TAI IN MASSACHUSETTS WAS APPROVED UPON CONDITIONS, WHICH ARE EFFECTIVE FOR TWO YEARS. THESE CONDITIONS INCLUDE: A) HEIGHTENED SUPERVISION; B) NO PRINCIPAL, SUPERVISORY, OR MANAGERIAL DUTIES; C) NO DISCRETION IN MASSACHUSETTS CUSTOMER ACCOUNTS; D) QUARTERLY REVIEW OF MASSACHUSETTS CUSTOMER ACCOUNTS; E) NOTIFICATION ANY WRITTEN OR ORAL CUSTOMER COMPLAINT; F) NOTIFICATION OF ANY REGULATORY INVESTIGATION, INTERNAL INVESTIGATION, ARBITRATION PROCEEDING, OR SECURITIES-RELATED LITIGATION; G) PROVIDE NOTICE TO MASSACHUSETTS CUSTOMERS OF GRISWOLD'S CONDITIONAL REGISTRATION AND THAT A COPY OF THE ORDER MAY BE OBTAINED FROM TAI; H) GRISWOLD SHALL NOTIFY HIS BRANCH MANAGER AND A COMPLIANCE OFFICER OF TAI OF ANY AFFILIATION HIS IMMEDIATE FAMILY HAS WITH A PUBLICLY TRADED COMPANY; AND, TWENTY-FOUR (24) MONTHS AFTER THE ENTRY OF THE ORDER, GRISWOLD SHALL SUBMIT TO TAI AND THE DIRECTOR AN AFFIDAVIT STATING THAT HE HAS FULLY COMPLIED WITH ALL CONDITIONS OF PART 9 OF THE ORDER.</p>
Sanction Details:	<p>GRISWOLD'S APPLICATION FOR REGISTRATION AS AN AGENT FOR TAI IN MASSACHUSETTS WAS APPROVED UPON CONDITIONS, WHICH ARE EFFECTIVE FOR TWO YEARS. THESE CONDITIONS INCLUDE: A) HEIGHTENED SUPERVISION; B) NO PRINCIPAL, SUPERVISORY, OR MANAGERIAL DUTIES; C) NO DISCRETION IN MASSACHUSETTS</p>



CUSTOMER ACCOUNTS; D) QUARTERLY REVIEW OF MASSACHUSETTS CUSTOMER ACCOUNTS; E) NOTIFICATION ANY WRITTEN OR ORAL CUSTOMER COMPLAINT; F) NOTIFICATION OF ANY REGULATORY INVESTIGATION, INTERNAL INVESTIGATION, ARBITRATION PROCEEDING, OR SECURITIES-RELATED LITIGATION; G) PROVIDE NOTICE TO MASSACHUSTTS CUSTOMERS OF GRISWOLD'S CONDITIONAL REGISTRATION AND THAT A COPY OF THE ORDER MAY BE OBTAINED FROM TAI; H) GRISWOLD SHALL NOTIFY HIS BRANCH MANAGER AND A COMPLIANCE OFFICER OF TAI OF ANY AFFILIATION HIS IMMEDIATE FAMILY HAS WITH A PUBLICLY TRADED COMPANY; AND, TWENTY-FOUR (24) MONTHS AFTER THE ENTRY OF THE ORDER, GRISWOLD SHALL SUBMIT TO TAI AND THE DIRECTOR AN AFFIDAVIT STATING THAT HE HAS FULLY COMPLIED WITH ALL CONDITIONS OF PART 9 OF THE ORDER.

Regulator Statement

GRISWOLD'S APPLICATION FOR REGISTRATION AS AN AGENT FOR TAI IN MASSACHUSETTS WAS APPROVED UPON CONDITIONS, WHICH ARE EFFECTIVE FOR TWO YEARS. THESE CONDITIONS INCLUDE: A) HEIGHTENED SUPERVISION; B) NO PRINCIPAL, SUPERVISORY, OR MANAGERIAL DUTIES; C) NO DISCRETION IN MASSACHUSETTS CUSTOMER ACCOUNTS; D) QUARTERLY REVIEW OF MASSACHUSETTS CUSTOMER ACCOUNTS; E) NOTIFICATION ANY WRITTEN OR ORAL CUSTOMER COMPLAINT; F) NOTIFICATION OF ANY REGULATORY INVESTIGATION, INTERNAL INVESTIGATION, ARBITRATION PROCEEDING, OR SECURITIES-RELATED LITIGATION; G) PROVIDE NOTICE TO MASSACHUSTTS CUSTOMERS OF GRISWOLD'S CONDITIONAL REGISTRATION AND THAT A COPY OF THE ORDER MAY BE OBTAINED FROM TAI; H) GRISWOLD SHALL NOTIFY HIS BRANCH MANAGER AND A COMPLIANCE OFFICER OF TAI OF ANY AFFILIATION HIS IMMEDIATE FAMILY HAS WITH A PUBLICLY TRADED COMPANY; AND, TWENTY-FOUR (24) MONTHS AFTER THE ENTRY OF THE ORDER, GRISWOLD SHALL SUBMIT TO TAI AND THE DIRECTOR AN AFFIDAVIT STATING THAT HE HAS FULLY COMPLIED WITH ALL CONDITIONS OF PART 9 OF THE ORDER.

Reporting Source: Individual
Regulatory Action Initiated By: MASSACHUSETTS SECURITIES DIVISION
Sanction(s) Sought: Other
Other Sanction(s) Sought: CONDITIONAL REGISTRATION
Date Initiated: 05/23/2000
Docket/Case Number: R-00-53
Employing firm when activity occurred which led to the regulatory action: MERRILL LYNCH
Product Type: Equity Listed (Common & Preferred Stock)
Other Product Type(s):

Allegations: A) MERRILL LYNCH CONDUCTED AN INTERNAL INVESTIGATION OF GRISWOLD REGARDING A NASDAQ NATIONAL MARKET STOCK, WHICH RESULTED IN INTERNAL SANCTIONS THAT INCLUDED A LETTER OF CENSURE; A\$10,000 FINE AND REVERSAL OF CERTAIN PRODUCTION CREDITS FOR JANUARY 1997; B) ON JANUARY 3, 2000 MERRILL LYNCH TERMINATED GRISWOLD FOR EFFECTING A TRANSACTION IN A CUSTOMER'S ACCOUNT BY THE CUSTOMER'S HUSBAND WHEN THER WAS



NO WRITTEN AUTHORIZATION ON FILE; C) IN MAY 1997, UPON NOTICE OF MERRILL LYNCH'S INTERNAL INVESTIGATION, THE NEW YORK STOCK EXCHANGE (THE "NYSE") CONDUCTED AN INVESTIGATION OF GRISWOLD THAT RESULTED IN THE IMPOSITION OF A CENSURE, A \$50,000 FINE, AND A TWO MONTH SUSPENSION. THE ALLEGATIONS AGAINST GRISWOLD RAISE CONCERNS THAT NECESSITATE THAT THE DIVISION PLACE CONDITIONS ON HIS REGISTRATION AS AN AGENT OF TAI.

Current Status: Final

Resolution: Consent

Resolution Date: 07/28/2000

Sanctions Ordered:

Other Sanctions Ordered: GRISWOLD'S APPLICATION FOR REGISTRATION AS AGENT FOR TAI IN MASSACHUSETTS WAS APPROVED UPON CONDITIONS, WHICH ARE EFFECTIVE FOR TWO YEARS. THESE CONDITIONS INCLUDE: A) HEIGHTED SUPERVISION; B) NO PRINCIPAL, SUPERVISORY, OR MANAGERIAL DUTIES; C) NO DISCRETION IN MASSACHUSETTS CUSTOMER ACCOUNTS; D) QUARTLY REVIEW OF MASSACHUSETTS CUSTOMER ACCOUNTS; E) NOTIFICATION ANY WRITTEN OR ORAL CUSTOMER COMPLAINT; F) NOTIFICATION OF ANY REGULATORY INVESTIGATION, INTERNAL INVESTIGATION, ARBITRATION PROCEEDING, OR SECURITIES-RELATED LITIGATION; G) PROVIDE NOTICE TO MASSACHUSTTS CUSTOMERS OF GRISWOLD'S CONDITIONAL REGISTRATION AND THAT A COPY OF THE ORDER MAY BE OBTAINED FROM TAI; (H) GRISWOLD SHALL NOTIFY HIS BRANCH MANAGER AND A COMPLIANCE OFFICER OF TAI OF ANY AFFILIATION HIS IMMEDIATE FAMILY HAS WITH A PUBLICLY TRADED COMPANY; AND, TWENTY FOUR (24) MONTHS AFTER THE ENTRY OF THE ORDER, GRISWOLD SHALL SUBMIT TO TAI AND THE DIRECTOR AN AFFIDAVIT STATING THAT HE HAS FULLY COMPLIED WITH ALL CONDITIONS OF PART 9 OF THE ORDER.

Sanction Details: GRISWOLD'S APPLICATION FOR REGISTRATION AS AN AGENT FOR TAI IN MASSACHUSETTS WAS APPROVED UPON CONDITIONS, WHICH ARE EFFECTIVE FOR TWO YEARS. THESE CONDITIONS INCLUDE: A) HEIGHTENED SUPERVISION ; B) NO PRINCIPAL, SUPERVISORY, OR MANAGERIAL DUTIES; C) NO DISCRETION IN MASSACHUSETTS CUSTOMER ACCOUNTS B) NO IN MASSACHUSETTS CUSTOMER ACCOUNTS; D) QUARTERLY REVIEW OF MASSACHUSETTS CUSTOMER ACCOUNTS; E) NOTIFICATION ANY WRITTEN OR ORAL CUSTOMER COMPLAINT; F) NOTIFICATION OF ANY REGULATORY INVESTIGATION, INTERNAL INVESTIGATION, ARBITRATION PROCEEDING, OR SECURITIES-RELATED LITIGATION; G) PROVIDE NOTICE TO MASSACHUSTTS CUSTOMERS OF GRISWOLD'S CONDITIONAL REGISTRATION AND THAT A COPY OF THE ORDER MAY BE OBTAINED FROM TAI; H) GRISWOLD SHALL NOTIFY HIS BRANCH MANAGER AND A COMPLIANCE OFFICER OF TAI OF ANY AFFILIATION HIS IMMEDIATE FAMILY HAS WITH A PUBLICLY TRADED COMPANY; AND TWENTY-FOUR (24) MONTHS AFTER THE ENTRY OF THE ORDER, GRISWOLD SHALL SUBMIT TO TAI AND THE DIRECTOR AN AFFIDAVIT STATING THAT HE HAS FULLY COMPLIED WITH ALL CONDITIONS OF PART 9 OF THE ORDER.

Broker Statement GRISWOLD'S APPLICATION FOR REGISTRATION AS AN AGENT FOR TAI IN MASSACHUSETTS WAS APPROVED UPON CONDITIONS, WHICH ARE EFFECTIVE FOR TWO YEARS. THESE CONDITIONS INCLUDE: A) HEIGHTENED SUPERVISION ; B) NO PRINCIPAL, SUPERVISORY, OR MANAGERIAL DUTIES; (C) NO DISCRETION IN MASSACHUSETTS CUSTOMER ACCOUNTS; D) QUARTERLY REVIEW OF MASSACHUSETTS CUSTOMER ACCOUNTS; E) NOTIFICATION ANY WRITTEN OR ORAL



CUSTOMER COMPLAINT; F) NOTIFICATION OF ANY REGULATORY INVESTIGATION, INTERNAL INVESTIGATION, ARBITRATION PROCEEDING, OR SECURITIES-RELATED LITIGATION; G) PROVIDE NOTICE TO MASSACHUSETTS CUSTOMERS OF GRISWOLD'S CONDITIONAL REGISTRATION AND THAT A COPY OF THE ORDER MAY BE OBTAINED FROM TAI; H) GRISWOLD SHALL NOTIFY HIS BRANCH MANAGER AND A COMPLIANCE OFFICER OF TAI OF ANY AFFILIATION HIS IMMEDIATE FAMILY HAS WITH A PUBLICLY TRADED COMPANY; AND TWENTY-FOUR (24) MONTHS AFTER THE ENTRY OF THE ORDER, GRISWOLD SHALL SUBMIT TO TAI AND THE DIRECTOR AN AFFIDAVIT STATING THAT HE HAS FULLY COMPLIED WITH ALL CONDITIONS OF PART 9 OF THE ORDER.

PLEASE NOTE: I HAVE RECEIVED THE NEW DISCLOSURE QUESTIONS 14D2 (A) & (B) AND BELIEVE THIS ACTION IS NOT RESPONSIVE TO THESE NEW QUESTIONS. SPECIFICALLY I WAS NOT "BARRED" FROM ANY ASSOCIATION WITH AN ENTITY REGULATED BY A STATE AUTHORITY THAT SUPERVISES OR EXAMINES BANKS, SAVING ASSOCIATES, OR CREDIT UNIONS, STATE INSURANCE COMMISSION. FURTHER MORE, THE UNDERLYING FACTS DO NOT REFERENCE ALLEGATION OF "FRAUDULENT MANIPULATIVE OR DECEPTIVE CONDUCT" AS I UNDERSTAND THESE TERMS.

Disclosure 3 of 3

Reporting Source: Regulator
Regulatory Action Initiated By: NYSE DIVISION OF ENFORCEMENT
Sanction(s) Sought:
Other Sanction(s) Sought:
Date Initiated: 11/05/1999
Docket/Case Number: HPD#00-6
Employing firm when activity occurred which led to the regulatory action:
Product Type: Other
Other Product Type(s):

Allegations: **11/05/1999** STIPULATION AND CONSENT TO PENALTY FILED BY NYSE DIVISION OF ENFORCEMENT AND PENDING CONSENTED TO FINDINGS: 1. CAUSED A VIOLATION OF REGULATIONS ?240.17A-3 AND 17A-4 PROMULGATED PURSUANT TO THE SECURITIES EXCHANGE ACT OF 1934 AND OF EXCHANGE RULE 440 BY FALSELY MARKING ORDER TICKETS "UNSOLICITED". 2. ENGAGED IN CONDUCT INCONSISTENT WITH JUST AND EQUITABLE PRINCIPLES OF TRADE IN THAT HE MADE MISSTATEMENTS TO SUPERVISORS CONCERNING THE SOLICITATION OF CERTAIN TRANSACTIONS FOR CUSTOMERS OF HIS MEMBER ORGANIZATION EMPLOYER. 3. CAUSED A VIOLATION OF EXCHANGE RULE 405(1) IN THAT HE FAILED TO DISCLOSE TO HIS MEMBER ORGANIZATION EMPLOYER ESSENTIAL FACTS RELATIVE TO EVERY ORDER. 4. ENGAGED IN CONDUCT INCONSISTENT WITH JUST AND EQUITABLE PRINCIPLES OF TRADE IN THAT IN CONTRAVENTION OF FIRM PROCEDURES, HE SOLICITED PURCHASE ORDERS FOR A SECURITY NOT RECOMMENDED OR FOLLOWED BY HIS FIRM, AND FAILED TO DISCLOSE TO SUPERVISORY PERSONNEL THE FACT THAT HIS FATHER WAS A MEMBER OF THE BOARD



OF DIRECTORS OF THE ISSUER OF THE SECURITY. 5. VIOLATED EXCHANGE RULE 408(A) IN THAT HE ACCEPTED ORDERS FOR AN ACCOUNT FROM A PERSON OTHER THAN THE CUSTOMER WITHOUT FIRST OBTAINING THE WRITTEN AUTHORIZATION OF THE CUSTOMER. CONSENTED TO THE IMPOSITION OF THE PENALTY OF A CENSURE, A FINE OF \$50,000, AND A TWO MONTH SUSPENSION.

Current Status: Final

Resolution: Decision

Resolution Date: 03/07/2000

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: **01/24/2000** DECISION 00-6 ISSUED BY NYSE HEARING PANEL DECISION: CAUSED A VIOLATION OF SEC REGS 240.17A-3 AND A-4 BY FALSELY MARKING ORDER TICKETS UNSOLICITED"; MADE MISSTATEMENTS TO SUPERVISORS CONCERNING THE SOLICITATION OF CUSTOMER TRANSACTIONS; CAUSED A VIOLATION OF RULE 405(1) BY FAILING TO DISCLOSE ESSENTIAL FACTS TO HIS EMPLOYER; SOLICITED ORDERS FOR A SECURITY NOT RECOMMENDED BY HIS FIRM AND FAILED TO DISCLOSE HIS FATHER WAS A DIRECTOR OF THE ISSUER; AND VIOLATED RULE 408(A) BY ACCEPTING ORDERS FROM A PERSON OTHER THAN THE CUSTOMER WITHOUT WRITTEN AUTHORIZATION. CONSENT TO A CENSURE, A \$50,000 FINE, AND A TWO MONTH BAR.

Regulator Statement **03/07/2000** THE DECISION IS NOW FINAL. THE BAR OR SUSPENSION IMPOSED IS EFFECTIVE THE CLOSE OF BUSINESS MARCH 3, 2000. CONTACT: PEGGY GERMINO (212)656-8450

Reporting Source: Firm

Regulatory Action Initiated By: NEW YORK STOCK EXCHANGE

Sanction(s) Sought: Bar

Other Sanction(s) Sought: FINE \$50,000.00 CENSURE

Date Initiated: 11/05/1999

Docket/Case Number:

Employing firm when activity occurred which led to the regulatory action: MERRILL LYNCH, PIERCE, FENNER & SMITH INC.

Product Type: Equity Listed (Common & Preferred Stock)

Other Product Type(s):

Allegations: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, MR. GRISWOLD HAS ENTERED INTO A STIPULATION AND CONSENT WITH THE NYSE. THE ALLEGATIONS INVOLVE MISMARKING ORDER TICKETS AND HIS FAILURE TO DISCLOSE SUCH CONDUCT TO HIS SUPERVISOR.

Current Status: Final

Resolution: Decision

Resolution Date: 01/18/2000



Sanctions Ordered: Bar
Censure
Monetary/Fine \$50,000.00

Other Sanctions Ordered:

Sanction Details: SEE ITEM 13 BELOW

Firm Statement ON JANUARY 18, 2000 THE NYSE HEARING PANEL ISSUED A DECISION WHEREBY GRISWOLD WAS FINED \$50,000.00, BARRED FOR 2 MONTHS AND CENSURED FOR MIS-MARKING ORDER TICKETS, FAILING TO DISCLOSE ESSENTIAL FACTS TO HIS EMPLOYER, FAILING TO DISCLOSE HIS FATHER WAS A DIRECTOR OF THE ISSUER OF SECURITIES HE RECOMMENDED, AND ACCEPTING ORDERS FROM A PERSON OTHER THAN A CUSTOMER WITHOUT WRITTEN AUTHORIZATION. GRISWOLD CONSENTED TO THE ENTRY OF THE DECISION AND SANCTIONS WITHOUT ADMITTING OR DENYING GUILT.

Reporting Source: Individual

Regulatory Action Initiated By: NEW YORK STOCK EXCHANGE

Sanction(s) Sought: Bar

Other Sanction(s) Sought: FINE \$50,000.00
CENSURE

Date Initiated: 11/05/1999

Docket/Case Number: N/A

Employing firm when activity occurred which led to the regulatory action: MERRILL LYNCH, PIERCE, FENNER & SMITH INC.

Product Type: Equity Listed (Common & Preferred Stock)

Other Product Type(s):

Allegations: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, MR. GRISWOLD HAS ENTERED INTO A STIPULATION AND CONSENT WITH THE NYSE, WHICH IS PENDING APPROVAL BY THE NYSE. THE ALLEGATIONS INVOLVE MISMARKING ORDER TICKETS AND HIS FAILURE TO DISCLOSE SUCH CONDUCT TO HIS SUPERVISOR.

Current Status: Final

Resolution: Decision

Resolution Date: 01/18/2000

Sanctions Ordered: Bar
Censure
Monetary/Fine \$50,000.00

Other Sanctions Ordered:

Sanction Details: SEE ITEM #13

Broker Statement ON JANUARY 18, 2000 THE NYSE HEARING PANEL ISSUED A DECISION WHEREBY GISWOLD WAS FINED \$50,000.00, BARRED FOR 2 MONTHS AND CENSURED FOR MIS-MARKING ORDER TICKETS, FAILING TO DISCLOSE ESSENTIAL FACTS TO HIS EMPLOYER, FAILING TO DISCLOSE HIS FATHER WAS A DIRECTOR OF THE ISSUER OF SECURITIES HE RECOMMENDED,



AND ACCEPTING ORDERS FROM A PERSON OTHER THAN A CUSTOMER WITHOUT WRITTEN AUTHORIZATION. GRISWOLD CONSENTED TO THE ENTRY OF THE DECISION AND SANCTIONS WITHOUT ADMITTING OR DENYING GUILT.



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: MERRILL LYNCH, PIERCE, FENNER & SMITH INC.

Allegations: CUSTOMER ALLEGES THAT HER FINANCIAL CONSULTANT DECEIVED HER REGARDING A MUNIYIELD FUND AND A KEMPER FUND IN THAT HE TOLD HER THAT HER "PRINCIPAL WAS SECURE".

Product Type: Mutual Fund(s)

Alleged Damages: \$11,838.24

Customer Complaint Information

Date Complaint Received: 01/04/2001

Complaint Pending? No

Status: Settled

Status Date: 02/23/2001

Settlement Amount: \$11,838.24

Individual Contribution Amount: \$0.00

Firm Statement THIS MATTER WAS SETTLED AS A BUSINESS DECISION IN ORDER TO AVOID THE COSTS AND UNCERTAINTIES OF LITIGATION.

.....

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: MERILL LYNCH, PIERCE, FENNER & SMITH INC.

Allegations: CUSTOMER ALLEGES THAT HER FINANCIAL CONSULTANT DECEIVED HER REGARDING A MUNIYEILD FUND AND A KEMPER FUND IN THAT HE TOLD HER THAT HER "PRINCIPAL WAS SECURE".

Product Type: Mutual Fund(s)

Alleged Damages: \$11,838.24

Customer Complaint Information

Date Complaint Received: 01/04/2001

Complaint Pending? No

Status: Settled

Status Date: 02/23/2001



Settlement Amount: \$11,838.24
Individual Contribution Amount: \$0.00
Broker Statement THIS MATTER WAS SETTLED S A BUSINESS DECISION IN ORDER TO AVOID THE COSTS AND UNCERTAINTIES OF LITIGATION.

Disclosure 2 of 2

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: MERRILL LYNCH, PIERCE, FENNER & SMITH INC.
Allegations: CUSTOMER ALLEGES THAT A STOCK TRADE MADE OVER SIX YEARS AGO IN APRIL 1994 WAS MARKED UNSOLICITED WHEN IT ACTUALLY WAS SOLICITED.
Product Type: Equity - OTC
Alleged Damages: \$12,611.96

Customer Complaint Information

Date Complaint Received: 10/02/2000
Complaint Pending? No
Status: Settled
Status Date: 01/16/2001
Settlement Amount: \$7,500.00
Individual Contribution Amount: \$0.00
Firm Statement THIS MATTER WAS SETTLED IN ORDER TO AVOID THE COSTS AND UNCERTAINTIES OF LITIGATION.

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: MERRILL LYNCH, PIERCE, FENNER & SMITH, INC.
Allegations: CUSTOMER ALLEGES THAT A STOCK TRADE MADE OVER SIX YEARS AGO IN APRIL 1994 WAS MARKED UNSOLICITED WHEN IT ACTUALLY WAS SOLICITED.
Product Type: Equity - OTC
Alleged Damages: \$12,611.96

Customer Complaint Information

Date Complaint Received: 10/02/2000
Complaint Pending? No
Status: Settled
Status Date: 01/16/2001
Settlement Amount: \$7,500.00



Individual Contribution Amount: \$0.00

Broker Statement THIS MATTER WAS SETTLED AS A BUSINESS DECISION IN ORDER TO AVOID THE COSTS AND UNCERTAINTIES OF LITIGATION.



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:	Individual
Firm Name:	MERRILL LYNCH
Termination Type:	Discharged
Termination Date:	01/03/2000
Allegations:	MR. GRISWOLD WAS TERMINATED ON 1/3/2000 BECAUSE HE ACCEPTED ORDERS FOR AN ACCOUNT OF A CLIENT BASED ON INSTRUCTIONS FROM THE CLIENTS HUSBAND. MR. GRISWOLD ACCEPTED THESE ORDERS WITHOUT DOCUMENTATION AS THE HUSBANDS AUTHORITY TO ENTER ORDERS ON BEHALF OF THE CLIENT.
Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Types:	N/A
Broker Statement	MR. GRISWOLD ACCEPTED AN ORDER TO PURCHASE AOL IN A CLIENT'S IRA ON THE INSTRUCTION OF THE CLIENTS HUSBAND. THERE WAS NO POWER OF ATTORNEY (POA) ON FILE AUTHORIZING THIS ON 9/15/97. MR. GRISWOLD CALLED THE HUSBAND TO SELL AOL WHICH HE AUTHORIZED ON HIS & HIS WIFE'S IRA. ON 12/2/99 THE CLIENT CALLED TO CLAIM HE AUTHORIZED SELLING AOL IN HIS IRA BUT NOT HIS WIFE'S IRA AND WANTED THE AOL PUT BACK IN HIS WIFE'S ACCOUNT.



End of Report

This page is intentionally left blank.