



## IAPD Report

# THOMAS LLOYD KUNKEL

CRD# 2510614

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

Please contact FINRA with any concerns.



## 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

### THOMAS LLOYD KUNKEL (CRD# 2510614)

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 **05/06/2025**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	VIRTUE CAPITAL MANAGEMENT, LLC	CRD# 167816	10/04/2018

### QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **2** 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
IA	HORTER INVESTMENT MANAGEMENT, LLC	119880	Eau Claire, WI	01/10/2017 - 10/02/2018
B	CAPITAL FINANCIAL SERVICES, INC.	8408	EAU CLAIRE, WI	10/09/2006 - 12/31/2016
IA	CAPITAL FINANCIAL SERVICES, INC.	8408	EAU CLAIRE, WI	10/09/2006 - 12/31/2016

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	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 **2** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

### Employment 1 of 1

Firm Name: **VIRTUE CAPITAL MANAGEMENT, LLC**  
Main Address: 12 CADILLAC DR.  
SUITE 280  
BRENTWOOD, TN 37027  
Firm ID#: 167816

	Regulator	Registration	Status	Date
	Minnesota	Investment Adviser Representative	Approved	05/06/2025
	Wisconsin	Investment Adviser Representative	Approved	10/04/2018

### Branch Office Locations

**VIRTUE CAPITAL MANAGEMENT, LLC**  
POINCIANA, FL

**VIRTUE CAPITAL MANAGEMENT, LLC**  
ROCHESTER, MN



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



#### Principal/Supervisory Exams

Exam	Category	Date
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No information reported.



#### General Industry/Product Exams

Exam	Category	Date
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 Securities Industry Essentials Examination (SIE)	SIE	12/31/2016
 General Securities Representative Examination (S7)	Series 7	10/12/2004
 Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	08/23/1994

#### State Securities Law Exams

Exam	Category	Date
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 Uniform Investment Adviser Law Examination (S65)	Series 65	09/07/2016
 Uniform Securities Agent State Law Examination (S63)	Series 63	08/04/1994

### 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
IA	01/10/2017 - 10/02/2018	HORTER INVESTMENT MANAGEMENT, LLC	CRD# 119880	Eau Claire, WI
B	10/09/2006 - 12/31/2016	CAPITAL FINANCIAL SERVICES, INC.	CRD# 8408	EAU CLAIRE, WI
IA	10/09/2006 - 12/31/2016	CAPITAL FINANCIAL SERVICES, INC.	CRD# 8408	EAU CLAIRE, WI
B	07/01/2002 - 10/10/2006	THRIVENT INVESTMENT MANAGEMENT INC.	CRD# 18387	EAU CLAIRE, WI
B	08/24/1994 - 07/01/2002	LUTHERAN BROTHERHOOD SECURITIES CORP.	CRD# 4205	MINNEAPOLIS, MN

#### 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
10/2018 - Present	Virtue Capital Management, LLC	Investment Adviser Representative	Y	BRENTWOOD, TN, United States
10/2006 - Present	Cornerstone Financial Advisors, LLC	President	Y	ROCHESTER, MN, United States
01/2017 - 10/2018	Horter Investment Management, LLC	Investment Advisor Representative	Y	Cincinnati, OH, United States
10/2006 - 12/2016	CAPITAL FINANCIAL SERVICES, INC.	REGISTERED REPRESENTATIVE	Y	MINOT, ND, 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) CORNERSTONE FINANCIAL ADVISORS, LLC , Title: PRESIDENT, Description: INSURANCE &/OR ANNUITY SALES, Start Date: 10-01-2006, Address: ROCHESTER, MN, Investment-related? NO, Hours per month: 45, During trading hours: 45



## 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	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:** 01/23/2013

**Docket/Case Number:** [2011026362601](#)

**Employing firm when activity occurred which led to the regulatory action:** CAPITAL FINANCIAL SERVICES

**Product Type:** Other: ILLIQUID PRIVATE PLACEMENTS AND REITS

**Allegations:** NASD RULES 2110, 2310: KUNKEL MADE UNSUITABLE RECOMMENDATIONS TO A CUSTOMER, WHO WAS AN ELDERLY AND UNSOPHISTICATED INVESTOR, FOR ALTERNATIVE INVESTMENTS WITH HIGH-RISK FINANCIAL PRODUCTS. KUNKEL RECOMMENDED INVESTMENTS IN SOME PRIVATE PLACEMENTS AND SOME REITS TO THE CUSTOMER, WHO ACCEPTED THE RECOMMENDATIONS AND INVESTED A TOTAL OF \$595,000 IN THE OFFERINGS. THE SOURCE OF FUNDS FOR NEARLY THE ENTIRE AMOUNT OF THESE INVESTMENTS WAS THE LIQUIDATION OF MUTUAL FUNDS AND VARIABLE ANNUITIES, AND BY THE END OF NEARLY TWO YEARS, APPROXIMATELY 55 PERCENT OF THE CUSTOMER'S LIQUID NET WORTH WAS CONCENTRATED IN THESE ALTERNATIVE INVESTMENTS. THE CUSTOMER EVENTUALLY LOST APPROXIMATELY \$235,000 OF THE \$595,000 THAT HE INVESTED IN THE ALTERNATIVE INVESTMENTS THAT KUNKEL RECOMMENDED. THE INVESTMENTS THAT KUNKEL RECOMMENDED WERE ALSO ILLIQUID. MANY OF THEM RESTRICTED INVESTORS FROM TRANSFERRING THEIR SHARES FOR CERTAIN PERIODS OF TIME OR



IMPOSED PENALTIES ON SUCH TRANSFERS. GIVEN THE INFORMATION AVAILABLE TO HIM CONCERNING THE CUSTOMER'S FINANCIAL NEEDS AND PERSONAL CIRCUMSTANCES, KUNKEL DID NOT HAVE REASONABLE GROUNDS FOR BELIEVING THAT THE ALTERNATIVE INVESTMENTS THAT HE RECOMMENDED TO THE CUSTOMER DURING A PERIOD WERE SUITABLE FOR HIM.

**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:** 01/23/2013

**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**

<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	ALL CAPACITIES
<b>Duration:</b>	30 BUSINESS DAYS
<b>Start Date:</b>	02/19/2013
<b>End Date:</b>	04/02/2013

**Monetary Sanction 1 of 1**

<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$5,000.00
<b>Portion Levied against individual:</b>	\$5,000.00
<b>Payment Plan:</b>	
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	02/04/2013
<b>Was any portion of penalty waived?</b>	No

**Amount Waived:****Regulator Statement**

WITHOUT ADMITTING OR DENYING THE FINDINGS, KUNKEL 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 ALL CAPACITIES FOR 30 BUSINESS DAYS. THE SUSPENSION IS IN EFFECT FROM FEBRUARY 19, 2013, THROUGH APRIL 2, 2013. FINE PAID IN FULL ON 2/4/13.

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**Reporting Source:**

Individual

**Regulatory Action Initiated By:**

FINRA

**Sanction(s) Sought:**

Other: N/A

**Date Initiated:**

01/23/2013

**Docket/Case Number:**[2011026362601](#)**Employing firm when activity occurred which led to the regulatory action:**

CAPITAL FINANCIAL SERVICES

**Product Type:**

Other: ILLIQUID PRIVATE PLACEMENTS AND REITS

**Allegations:**

NASD RULES 2110, 2310: KUNKEL MADE UNSUITABLE RECOMMENDATIONS TO A CUSTOMER, WHO WAS AN ELDERLY AND UNSOPHISTICATED INVESTOR, FOR ALTERNATIVE INVESTMENTS WITH HIGH-RISK FINANCIAL PRODUCTS. KUNKEL RECOMMENDED INVESTMENTS IN SOME PRIVATE PLACEMENTS AND SOME REITS TO THE CUSTOMER, WHO ACCEPTED THE RECOMMENDATIONS AND INVESTED A TOTAL OF \$595,000 IN THE OFFERINGS. THE SOURCE OF FUNDS FOR NEARLY THE ENTIRE AMOUNT OF THESE INVESTMENTS WAS THE LIQUIDATION OF MUTUAL FUNDS AND VARIABLE ANNUITIES, AND BY THE END OF NEARLY TWO YEARS, APPROXIMATELY 55 PERCENT OF THE CUSTOMER'S LIQUID NET WORTH WAS CONCENTRATED IN THESE ALTERNATIVE INVESTMENTS. THE CUSTOMER EVENTUALLY LOST APPROXIMATELY \$235,000 OF THE \$595,000 THAT HE INVESTED IN THE ALTERNATIVE INVESTMENTS THAT KUNKEL RECOMMENDED. THE INVESTMENTS THAT KUNKEL RECOMMENDED WERE ALSO ILLIQUID. MANY OF THEM RESTRICTED INVESTORS FROM TRANSFERRING THEIR SHARES FOR CERTAIN PERIODS OF TIME OR IMPOSED PENALTIES ON SUCH TRANSFERS. GIVEN THE INFORMATION AVAILABLE TO HIM CONCERNING THE CUSTOMER'S FINANCIAL NEEDS AND PERSONAL CIRCUMSTANCES, KUNKEL DID NOT HAVE REASONABLE GROUNDS FOR BELIEVING THAT THE ALTERNATIVE INVESTMENTS THAT HE RECOMMENDED TO THE CUSTOMER DURING A PERIOD WERE SUITABLE FOR HIM.

**Current Status:**

Final

**Resolution:**

Acceptance, Waiver &amp; 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:**

01/23/2013



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

**Sanction 1 of 1**

**Sanction Type:** Suspension

**Capacities Affected:** ALL CAPACITIES

**Duration:** 30 BUSINESS DAYS

**Start Date:** 02/19/2013

**End Date:** 04/02/2013

**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:** 02/14/2013

**Was any portion of penalty waived?** No

**Amount Waived:**

**Broker Statement**

WITHOUT ADMITTING OR DENYING THE FINDINGS, KUNKEL 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 ALL CAPACITIES FOR 30 BUSINESS DAYS. THE SUSPENSION IS IN EFFECT FROM FEBRUARY 19, 2013, THROUGH APRIL 2, 2013.

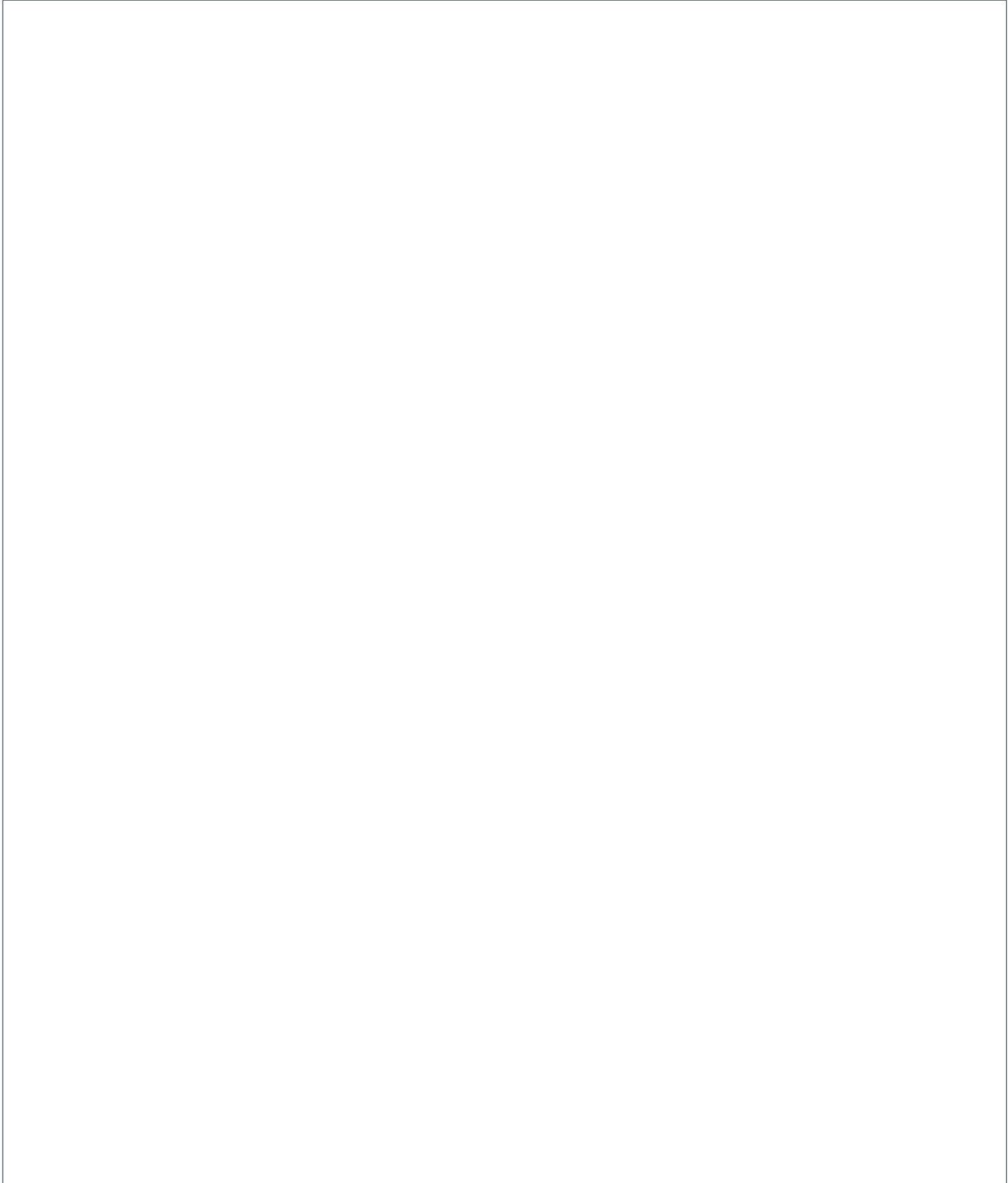
I HAD A STRONG RELATIONSHIP WITH MY CLIENT FOR OVER 15 YEARS. MY CLIENT HAD EXPERIENCED MARKET LOSSES IN SECURITY PRODUCTS IN THE PAST. HE WAS AWARE OF THE RISKS OF INVESTING IN THE MARKET. PRIOR TO THE MARKET CRASH IN 2008, MY CLIENT WAS A HEALTHY INDIVIDUAL, IN HIS 70'S, WHO WAS PLANNING TO LIVE ANOTHER 20 PLUS YEARS. HIS MOTHER HAD LIVED TO BE OVER 100 YEARS OLD. MY CLIENT HAD ENOUGH INCOME AND LIQUIDITY TO PURCHASE SPECULATIVE INVESTMENTS THAT OFFERED NO LIQUIDITY IN THE SHORT TERM.

UNFORTUNATELY, MY CLIENT DEVELOPED COMPLICATIONS AFTER A SURGICAL PROCEDURE, DURING THE SPRING OF 2009. AFTER THIS SURGERY MY CLIENT BECAME VERY FRAIL.

MY CLIENT HAD A SON-IN-LAW WHO SPECIALIZES IN LITIGATION, AND ARBITRATION OF SETTLEMENTS INVOLVING PERSONAL INJURIES. WHILE TRYING TO RECOVER, THE SON-IN-LAW ATTORNEY ENCOURAGED MY CLIENT TO INVOKE HIS DURABLE POWERS TO THE SON-IN-LAW ATTORNEY. MY CLIENT DID INVOKE THE DURABLE POWERS. THE SON-IN-LAW ATTORNEY TOOK IT UPON HIMSELF TO INITIATE THE COMPLAINT. IN MARCH OF 2010, THE SON-IN-LAW ATTORNEY HAD HIS FATHER-IN-LAW SIGN A FORMAL LETTER OF COMPLAINT.

ON JUNE 4, 2011 MY CLIENT DIED. THE SON-IN-LAW ATTORNEY IS THE PERSONAL REPRESENTATIVE FOR MY CLIENT'S ESTATE.

THIS IS THE FIRST AND ONLY COMPLAINT I HAVE EVER HAD SINCE RECEIVING MY SECURITIES LICENSE IN 1994.





## 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 1

<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	CAPITAL FINANCIAL SERVICES
<b>Allegations:</b>	CUSTOMER ALLEGES UNSUITABLE INVESTMENTS.
<b>Product Type:</b>	Direct Investment-DPP & LP Interests Oil & Gas Real Estate Security
<b>Alleged Damages:</b>	\$595,000.00

### Arbitration Information

<b>Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):</b>	FINRA DISPUTE RESOLUTION
<b>Docket/Case #:</b>	10-01197
<b>Date Notice/Process Served:</b>	03/22/2010
<b>Arbitration Pending?</b>	No
<b>Disposition:</b>	Settled
<b>Disposition Date:</b>	01/08/2013
<b>Monetary Compensation Amount:</b>	\$38,500.00
<b>Individual Contribution Amount:</b>	\$0.00



## End of Report

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