IAPD Report

Christopher Patrick Cromer

CRD# 2802020

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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

Christopher Patrick Cromer (CRD# 2802020)

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 **06/18/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	04/04/2008
IA	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	04/17/2008

QUALIFICATIONS

This representative is currently registered in **6** SRO(s) and **22** 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	WACHOVIA SECURITIES, LLC	19616	ROME, GA	01/01/2008 - 04/07/2008
IA	WACHOVIA SECURITIES, LLC	19616	ROME, GA	01/01/2008 - 04/07/2008
B	A. G. EDWARDS & SONS, INC.	4	ROME, GA	01/07/1999 - 01/03/2008

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	3

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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 **22** 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	Cboe BYX Exchange, Inc.	General Securities Representative	Approved	05/13/2014
B	Cboe BZX Exchange, Inc.	General Securities Representative	Approved	05/13/2014
B	Cboe Exchange, Inc.	General Securities Representative	Approved	04/04/2008
B	FINRA	General Securities Representative	Approved	04/04/2008
B	Nasdaq Stock Market	General Securities Representative	Approved	04/04/2008
B	New York Stock Exchange	General Securities Representative	Approved	04/04/2008
B	Alabama	Agent	Approved	04/04/2008
B	Arkansas	Agent	Approved	04/25/2023
B	California	Agent	Approved	05/07/2020
B	Colorado	Agent	Approved	06/18/2025
B	Connecticut	Agent	Approved	02/28/2011
B	Florida	Agent	Approved	01/31/2012
B	Georgia	Agent	Approved	04/04/2008

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Qualifications

	Regulator	Registration	Status	Date
IA	Georgia	Investment Adviser Representative	Approved	04/17/2008
B	Indiana	Agent	Approved	10/24/2023
B	Kansas	Agent	Approved	08/15/2023
B	Mississippi	Agent	Approved	06/09/2020
B	Nevada	Agent	Approved	12/24/2015
B	New Jersey	Agent	Approved	08/27/2018
B	New Mexico	Agent	Approved	12/18/2017
B	North Carolina	Agent	Approved	02/22/2012
B	Ohio	Agent	Approved	11/02/2023
B	Oklahoma	Agent	Approved	10/24/2023
B	Pennsylvania	Agent	Approved	02/15/2017
B	Tennessee	Agent	Approved	08/29/2018
B	Texas	Agent	Approved	12/18/2018
IA	Texas	Investment Adviser Representative	Restricted Approval	04/17/2008
B	Utah	Agent	Approved	02/05/2025
B	Virginia	Agent	Approved	08/11/2016
B	Washington	Agent	Approved	08/21/2019

Branch Office Locations

MERRILL LYNCH, PIERCE, FENNER & SMITH

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Qualifications

INCORPORATED
401 BROAD ST
ROME, GA 30161

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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 1 state securities law exam.

Principal/Supervisory Exams

Exam	Category	Date
No information reported.		

General Industry/Product Exams

	Exam	Category	Date
B	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
B	General Securities Representative Examination (S7)	Series 7	01/06/1999
B	Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	01/17/1997

State Securities Law Exams

	Exam	Category	Date
B	Uniform Securities Agent State Law Examination (S63)	Series 63	12/12/1996

PROFESSIONAL DESIGNATIONS

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

No information reported.

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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	01/01/2008 - 04/07/2008	WACHOVIA SECURITIES, LLC	CRD# 19616	ROME, GA
IA	01/01/2008 - 04/07/2008	WACHOVIA SECURITIES, LLC	CRD# 19616	ROME, GA
B	01/07/1999 - 01/03/2008	A. G. EDWARDS & SONS, INC.	CRD# 4	ROME, GA
IA	05/06/2003 - 01/01/2008	A. G. EDWARDS & SONS, INC.	CRD# 4	ROME, GA
B	08/19/1998 - 10/20/1998	EDWARD D. JONES & CO., L.P.	CRD# 250	ST. LOUIS, MO
B	01/20/1997 - 08/21/1998	EQ FINANCIAL CONSULTANTS, INC.	CRD# 6627	NEW YORK, NY
B	01/20/1997 - 08/21/1998	THE EQUITABLE LIFE ASSURANCE SOCIETY OF THE UNITED STATES	CRD# 4039	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
06/2011 - Present	Bank of America,N.A.	Senior Financial Advisor	Y	ROME, GA, United States
04/2008 - Present	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED : 7691	FINANCIAL ADVISOR	Y	ROME, GA, 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.

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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.

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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	3

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 3

Reporting Source: Regulator

Employing firm when activities occurred which led to the complaint: WELLS FARGO ADVISORS, LLC F/K/A WACHOVIA SECURITIES, LLC

Allegations: BREACH OF FIDUCIARY DUTY; NEGLIGENCE; FRAUD; BREACH OF CONTRACT

Product Type: Other: AUCTION RATE SECURITIES, FREDDIE MACS

Alleged Damages: $100,000.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: FINRA - CASE #09-06162

Date Notice/Process Served: 10/19/2009

Arbitration Pending? No

Disposition: Denied

Disposition Date: 09/09/2011

Disposition Detail: CROMER WAS A SUBJECT OF THE CUSTOMER'S STATEMENT OF CLAIM FOR THIS ARBITRATION ALLEGING THAT HE ALONG WITH HIS MEMBER FIRM CONTRIBUTED TO THE SALES PRACTICE VIOLATION(S). ACCORDINGLY, ALL CLAIM(S) AGAINST CROMER'S MEMBER FIRM WERE DENIED.

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Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	WELLS FARGO ADVISORS, LLC
Allegations:	CLAIMANTS, RESIDENTS OF FLORIDA, ALLEGE MISREPRESENTATION AGAINST WELLS FARGO ADVISORS FOR INVESTMENTS IN THE ARS MARKET MADE IN OCTOBER OF 2007. CLAIMANTS SEEK DAMAGES IN AN UNSPECIFIED AMOUNT BUT BELIEVED TO EXCEED $5,000.
Product Type:	Equity Listed (Common & Preferred Stock)
Alleged Damages:	$0.00
Alleged Damages Amount Explanation (if amount not exact):	CLAIMANTS SEEK DAMAGES IN AN UNSPECIFIED AMOUNT BUT BELIEVED TO EXCEED $5,000.
Is this an oral complaint?	No
Is this a written complaint?	Yes
Is this an arbitration/CFTC reparation or civil litigation?	Yes
Arbitration/Reparation forum or court name and location:	FINRA
Docket/Case #:	09-06162
Filing date of arbitration/CFTC reparation or civil litigation:	11/03/2009

Customer Complaint Information

Date Complaint Received:	11/09/2009
Complaint Pending?	No
Status:	Denied
Status Date:	09/09/2011
Settlement Amount:	
Individual Contribution Amount:	
Firm Statement	AFTER CONSIDERING THE PLEADINGS, TESTIMONY AND EVIDENCE PRESENTED, THE ARBITRATOR DECIDED THAT ALL OF CLAIMANTS' CLAIMS ARE DENIED.

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	WELLS FARGO ADVISORS, LLC
Allegations:	CLAIMANTS, RESIDENTS OF FLORIDA, ALLEGE MISREPRESENTATION AGAINST WELLS FARGO ADVISORS FOR INVESTMENTS IN THE ARS MARKET MADE IN OCTOBER OF 2007. CLAIMANTS SEEK DAMAGES IN AN UNSPECIFIED AMOUNT BUT BELIEVED TO EXCEED $5,000.
Product Type:	Equity Listed (Common & Preferred Stock)

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Alleged Damages:	$0.00
Alleged Damages Amount Explanation (if amount not exact):	CLAIMANTS SEEK DAMAGES IN AN UNSPECIFIED AMOUNT BUT BELIEVED TO EXCEED $5,000.
Is this an oral complaint?	No
Is this a written complaint?	Yes
Is this an arbitration/CFTC reparation or civil litigation?	Yes
Arbitration/Reparation forum or court name and location:	FINRA
Docket/Case #:	09-06162
Filing date of arbitration/CFTC reparation or civil litigation:	11/03/2009

Customer Complaint Information

Date Complaint Received:	11/09/2009
Complaint Pending?	No
Status:	Denied
Status Date:	09/09/2011
Settlement Amount:	
Individual Contribution Amount:	
Broker Statement	AFTER CONSIDERING THE PLEADINGS, TESTIMONY AND EVIDENCE PRESENTED, THE ARBITRATOR DECIDED THAT ALL OF CLAIMANTS' CLAIMS ARE DENIED.

Disclosure 2 of 3

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	WACHOVIA SECURITIES, LLC
Allegations:	ALLEGED WOULD NEVER HAVE INVESTED IN THE SECURITY EXCEPT FOR THE ASSURANCES BY THE FC THAT IT WAS COMPLETELY LIQUID. ALLEGED DAMAGES, UNSPECIFIED, BUT BELIEVED TO EXCEED $5,000. (DATES OF ACTIVITY ARE NOT SPECIFIED.)
Product Type:	Other: AUCTION RATE SECURITIES
Alleged Damages:	$0.00
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

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Date Complaint Received:	06/26/2008
Complaint Pending?	No
Status:	Settled
Status Date:	08/15/2008
Settlement Amount:	$50,000.00
Individual Contribution Amount:	$0.00
Firm Statement	THIS MATTER INVOLVES THE SALE OF AUCTION RATE SECURITIES (ARS). THE TRANSACTION(S) AT ISSUE TOOK PLACE BEFORE MID-FEBRUARY 2008, WHEN THE ARS MARKET SUFFERED WIDESPREAD AUCTION FAILURES AND ILLIQUIDITY. THE FINANCIAL ADVISOR DID NOT CAUSE, CONTRIBUTE OR HAVE ANY CONTROL WHATSOEVER OVER THESE MARKET EVENTS. THE FIRM REACHED AGREEMENT WITH CERTAIN OF ITS REGULATORS, PURSUANT TO WHICH IT REPURCHASED ARS FOR THEIR FULL PAR VALUE FROM CERTAIN CLIENTS, INCLUDING THE INSTANT CLIENT, WHETHER THEY COMPLAINED OR NOT. THE FINANCIAL ADVISOR WAS NOT A PARTY TO THAT AGREEMENT, DID NOT MAKE ANY PAYMENTS TO THE CLIENT, AND WAS NOT ASKED TO AND DID NOT CONTRIBUTE TO THE REPURCHASE AMOUNT. THE SETTLEMENT AMOUNT IN ITEM 11 ABOVE REFLECTS THE PAR VALUE OF THE REPURCHASED ARS, AS REQUIRED BY FINRA REGULATORY NOTICE 09-12.

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	WACHOVIA SECURITIES, LLC
Allegations:	ALLEGES WOULD NEVER HAVE INVESTED IN THE SECURITY EXCEPT FOR THE ASSURANCES BY THE FC THAT IT WAS COMPLETELY LIQUID. ALLEGES DAMAGES, UNSPECIFIED, BUT BELIEVED TO EXCEED $5,000. (DATES OF ACTIVITY ARE NOT SPECIFIED.)
Product Type:	Other: AUCTION RATE SECURITIES
Alleged Damages:	$0.00
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:	06/26/2008
Complaint Pending?	No
Status:	Settled
Status Date:	08/15/2008
Settlement Amount:	$50,000.00
Individual Contribution Amount:	$0.00
Broker Statement	THIS MATTER INVOLVES THE SALE OF AUCTION RATE SECURITIES (ARS).

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THE TRANSACTION(S) AT ISSUE TOOK PLACE BEFORE MID-FEBRUARY 2008, WHEN THE ARS MARKET SUFFERED WIDESPREAD AUCTION FAILURES AND ILLIQUIDITY. THE FINANCIAL ADVISOR DID NOT CAUSE, CONTRIBUTE OR HAVE ANY CONTROL WHATSOEVER OVER THESE MARKET EVENTS. THE FIRM REACHED AGREEMENT WITH CERTAIN OF ITS REGULATORS, PURSUANT TO WHICH IT REPURCHASED ARS FOR THEIR FULL PAR VALUE FROM CERTAIN CLIENTS, INCLUDING THE INSTANT CLIENT, WHETHER THEY COMPLAINED OR NOT. THE FINANCIAL ADVISOR WAS NOT A PARTY TO THAT AGREEMENT, DID NOT MAKE ANY PAYMENTS TO THE CLIENT, AND WAS NOT ASKED TO AND DID NOT CONTRIBUTE TO THE REPURCHASE AMOUNT. THE SETTLEMENT AMOUNT IN ITEM 11 ABOVE REFLECTS THE PAR VALUE OF THE REPURCHASED ARS, AS REQUIRED BY FINRA REGULATORY NOTICE 09-12.

Disclosure 3 of 3

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	WACHOVIA SECURITIES, LLC
Allegations:	ALLEGED MISREPRESENTATION AND OMISSION OF MATERIAL FACTS. ALLEGED DAMAGES, BELIEVED TO EXCEED $5,000. (DATES OF ACTIVITY ARE NOT SPECIFIED)
Product Type:	Other: AUCTION RATE SECURITIES
Alleged Damages:	$0.00
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:	06/16/2008
Complaint Pending?	No
Status:	Settled
Status Date:	08/15/2008
Settlement Amount:	$50,000.00
Individual Contribution Amount:	$0.00
Firm Statement	THIS MATTER INVOLVES THE SALE OF AUCTION RATE SECURITIES (ARS). THE TRANSACTION(S) AT ISSUE TOOK PLACE BEFORE MID-FEBRUARY 2008, WHEN THE ARS MARKET SUFFERED WIDESPREAD AUCTION FAILURES AND ILLIQUIDITY. THE FINANCIAL ADVISOR DID NOT CAUSE, CONTRIBUTE OR HAVE ANY CONTROL WHATSOEVER OVER THESE MARKET EVENTS. THE FIRM REACHED AGREEMENT WITH CERTAIN OF ITS REGULATORS, PURSUANT TO WHICH IT REPURCHASED ARS FOR THEIR FULL PAR VALUE FROM CERTAIN CLIENTS, INCLUDING THE INSTANT CLIENT, WHETHER THEY COMPLAINED OR NOT. THE FINANCIAL ADVISOR WAS NOT A PARTY TO THAT AGREEMENT, DID NOT MAKE ANY PAYMENTS TO THE CLIENT, AND WAS NOT ASKED TO AND DID NOT CONTRIBUTE TO THE REPURCHASE AMOUNT. THE SETTLEMENT AMOUNT IN ITEM 11

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ABOVE REFLECTS THE PAR VALUE OF THE REPURCHASED ARS, AS REQUIRED BY FINRA REGULATORY NOTICE 09-12.

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	WACHOVIA SECURITIES, LLC
Allegations:	ALLEGES MISREPRESENTATION AND OMISSION OF MATERIAL FACTS. ALLEGES DAMAGES, BELIEVED TO EXCEED $5,000.(DATES OF ACTIVITY ARE NOT SPECIFIED)
Product Type:	Other: AUCTION RATE SECURITIES
Alleged Damages:	$0.00
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:	06/16/2008
Complaint Pending?	No
Status:	Settled
Status Date:	08/15/2008
Settlement Amount:	$50,000.00
Individual Contribution Amount:	$0.00
Broker Statement	THIS MATTER INVOLVES THE SALE OF AUCTION RATE SECURITIES (ARS). THE TRANSACTION(S) AT ISSUE TOOK PLACE BEFORE MID-FEBRUARY 2008, WHEN THE ARS MARKET SUFFERED WIDESPREAD AUCTION FAILURES AND ILLIQUIDITY. THE FINANCIAL ADVISOR DID NOT CAUSE, CONTRIBUTE OR HAVE ANY CONTROL WHATSOEVER OVER THESE MARKET EVENTS. THE FIRM REACHED AGREEMENT WITH CERTAIN OF ITS REGULATORS, PURSUANT TO WHICH IT REPURCHASED ARS FOR THEIR FULL PAR VALUE FROM CERTAIN CLIENTS, INCLUDING THE INSTANT CLIENT, WHETHER THEY COMPLAINED OR NOT. THE FINANCIAL ADVISOR WAS NOT A PARTY TO THAT AGREEMENT, DID NOT MAKE ANY PAYMENTS TO THE CLIENT, AND WAS NOT ASKED TO AND DID NOT CONTRIBUTE TO THE REPURCHASE AMOUNT. THE SETTLEMENT AMOUNT IN ITEM 11 ABOVE REFLECTS THE PAR VALUE OF THE REPURCHASED ARS, AS REQUIRED BY FINRA REGULATORY NOTICE 09-12.

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End of Report

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