

FINANCIAL INDUSTRY REGULATORY AUTHORITY
OFFICE OF HEARING OFFICERS

Department of Enforcement,

Complainant,

v.

Take Charge Financial (CRD No. 16724),

and

Joan A. Perry (CRD No. 502847),

Respondents.

DISCIPLINARY PROCEEDING
No. 20110289509-01

COMPLAINT

The Department of Enforcement alleges:

SUMMARY

1. Respondent Joan A. Perry and her firm, Respondent Take Charge Financial (TCF), stole more than \$90,000 from their customers by taking the customers' funds directly out of their securities accounts without authorization. Respondents hid the thefts by designating the fund movements as fees of various types.
2. They subsequently attempted to conceal their misconduct from FINRA by asking customers to sign and backdate new versions of their existing fee agreements. These new versions contained added language ostensibly authorizing some of the "fees." However, before having the customers sign the agreements, Respondents failed to inform the customers about this change in the new version and, in at least some instances, they affirmatively misrepresented that the two versions were the same.
3. Perry later falsified other documents and provided false testimony to FINRA staff in order to conceal the thefts.

4. In addition, Perry borrowed approximately \$300,000 from a customer under circumstances prohibited by FINRA rules, and without the customer's authorization.
5. Further, Respondents failed to report or failed to timely report various customer complaints to FINRA.
6. Respondents failed to preserve correspondence in accordance with the requirements of Exchange Act Rule 17a-4.
7. TCF, acting through Perry, conducted securities business on multiple dates while failing to maintain minimum required net capital. Further, TCF, acting through Perry, failed to file timely notice of TCF's net capital deficiency.
8. Moreover, Respondents failed to conduct records searches in response to requests for information from the Financial Crimes Enforcement Network (FinCEN), and then made misrepresentations to FINRA staff in connection with their failure to conduct such searches.
9. Also, Perry failed to update her Form U4 to disclose an unsatisfied civil judgment against her, and she filed a materially incomplete and misleading Form U4 amendment in connection with the investigation that resulted in this Complaint.
10. Finally, when asked by FINRA staff pursuant to FINRA Rule 8210 to provide information and documents pertaining to Perry's incomplete and misleading Form U4 amendment, the Respondents failed to respond.

RESPONDENTS AND JURISDICTION

11. Perry entered the securities industry in or about March 1979 by filing a Form U4 to become registered at a FINRA member. She first became registered as a Municipal

Securities Representative at that time. In July 1982, she first became registered as a General Securities Representative and Municipal Securities Principal.

12. Since on or about May 9, 1986, Perry has been registered at TCF as a General Securities Representative, General Securities Principal, Municipal Securities Representative and Municipal Securities Principal. Since on or about September 16, 1992, she has also been registered at TCF as a Financial and Operations Principal. And since on or about October 13, 1997, Perry has also been registered at TCF as a Registered Options Principal.
13. TCF has been a FINRA member firm since on or about May 9, 1986. The firm conducts a general securities business from one office and currently employs two registered persons. TCF is also dually registered as an investment adviser with the State of California.
14. At all times relevant to this Complaint, Perry was the President, Chief Financial Officer and Anti-Money Laundering Compliance Officer of TCF.

FACTS COMMON TO MULTIPLE CAUSES OF ACTION

15. The Department realleges and incorporates by reference paragraphs 1 through 14 above.
16. From on or about February 5, 2009 through on or about November 30, 2011, Respondents transferred approximately \$90,781.06 from approximately 45 customer accounts to accounts owned or controlled by Respondents.
17. Respondents accomplished the transfers electronically, using the computer system of TCF's clearing firm. Within the clearing firm's system, Respondents designated each transfer of funds as a type of fee or commission.

18. At the time of each transfer, Respondents had not obtained authorization from the relevant customer to take the funds out of the customer account or charge the type of fee or commission claimed by Respondents.
19. Appendix A, attached and incorporated by reference, summarizes the above-described transfers.
20. From on or about August 18, 2011 through on or about August 19, 2011, FINRA staff was present at Respondents' office to conduct field work in connection with its investigation of a customer complaint. At that time, the staff inquired about fees charged to customers of TCF. Perry informed the staff that, in addition to the firm's standard 2% annual investment advisory fee, customers might have been charged fees in connection with reports pertaining to year-end analyses of customer portfolios.
21. While onsite, FINRA staff obtained copies of signed Advisory Services Agreements (ASAs) pertaining to approximately 24 customer accounts. Although these agreements included authorization for TCF to charge its standard investment advisory fee, none of the ASAs included an authorization for TCF to charge a fee in connection with portfolio analysis reports.
22. Also while onsite, FINRA staff requested copies of the reports. Perry replied that any such reports were contained in the customer files maintained by TCF. FINRA staff reviewed those files and did not find any such reports.
23. From on or about August 18, 2011 through on or about December 23, 2011, Respondents provided a new version of TCF's ASA (ASAv2) to their customers and requested that the customers sign it. Appendix B, attached and incorporated by

reference, summarizes the signed ASAv2s that Respondents obtained from their customers.

24. The ASAv2 included the following sentence, which was not present in earlier versions of the ASA: “The Advisor will provide a year-end report to the Client and will charge a fee proportion[sic] to the assets for the production of this analysis report, which will be included in the monthly brokerage statement that is provided to the Client.”
25. As to customers JBa, JH, KH, GJ, KJ, DK, EL, GL, LN, JN, MR, RS, CV, JV, MV, LW and JY, Respondents omitted to inform them that the ASAv2 ostensibly authorized a year-end report fee that had not been authorized in the original ASA. Further, each of these customers was not actually aware when signing the ASAv2 that it contained the added fee provision.
26. As to customers KB, LB, KH, GJ, LN, LP, RS, NS, JV, PV, CV, MV, DW, LW and LWF, Respondents falsely claimed to them that Respondents required a signature on the ASAv2 because the version of the ASA that had previously been signed was missing. The statement was false because Respondents still possessed the earlier versions and, in fact, they were subsequently produced to FINRA staff by Respondents.
27. As to customers JBa, KB, DK, JN, LP, RS, NS, PV, IV, CV, MV, DW, LW, LWF and JY, Respondents made a material misrepresentation to them by falsely claiming that the ASAv2 was “the same” as an earlier version of the ASA that the customers had signed.

28. As to each ASAv2 in Appendix B, Perry caused the falsification of the document by either altering the date(s) appearing by the customer signature line(s) or by requesting that the customer backdate the document.
29. On or about September 20, 2011, FINRA staff sent Respondents a request, pursuant to FINRA Rule 8210, for information and documents in connection with its investigation. Among the items requested were "... the last two portfolio analysis reports that Joan Perry compiled for her customers and for which she charged a portfolio analysis fee outside of her customary 2% management fee..." Respondents failed to provide the requested documents by the due date of September 21, 2011.
30. On or about September 23, 2011, FINRA staff sent Respondents a second request pursuant to Rule 8210 for the above-described reports. Respondents failed to provide the requested documents by the due date of September 27, 2011.
31. On or about October 17, 2011, FINRA staff sent Respondents a third request pursuant to Rule 8210 for the above-described reports, with a due date of October 24, 2011.
32. On or about October 25, 2011, in response to the above-described requests, FINRA staff received two reports from Respondents, one for customer TH and one for customer PV.
33. In fact, the two reports had never been sent to TH and PV. Rather, Perry manufactured the two reports in response to the September 20, September 23, and October 17, 2011 requests from FINRA staff.
34. On or about December 7, 2011, Perry testified to FINRA staff that she provided the portfolio analysis reports for Year 2010 to her customers sometime during the first

quarter of 2011. She further testified that she kept copies of all of these reports in the basement of TCF's office.

35. On or about December 13, 2011, FINRA staff appeared at the TCF office and requested that Respondents produce the portfolio analysis reports that Perry testified she had sent to her customers during the first quarter of 2011. At that time, Perry informed the staff that the reports were not in the basement, nor were they at her home. She then stated that they might be in a storage facility in Lake Tahoe.
36. On or about December 14, 2011, FINRA staff sent Respondents a letter, pursuant to FINRA Rule 8210, requesting that they produce, by December 16, 2011, all of the portfolio analysis reports that had been sent to customers for Year 2010.
37. From on or about December 16, 2011 through December 20, 2011, Respondents provided FINRA staff with approximately 55 portfolio analysis reports for Year 2010 in response to the staff's December 14, 2011 request.
38. Notwithstanding Perry's representations, the reports she produced had not been sent to customers prior to FINRA's initial queries about them in August 2011. Rather, Perry prepared them in response to FINRA's investigation.

FIRST CAUSE OF ACTION
Conversion (NASD Rule 2330 and FINRA Rules 2150 and 2010)
As to Respondents TCF and Perry

39. The Department realleges and incorporates by reference paragraphs 1 through 38 above.
40. As described in paragraphs 16 through 19 and Appendix A, by taking customer funds without authorization, Respondents violated NASD Rule 2330 and FINRA Rule 2010

for the period from February 5, 2009 through December 13, 2009, and FINRA Rules 2150 and 2010 for the period from December 14, 2009 through November 30, 2011.

SECOND CAUSE OF ACTION
Misrepresentations and Omissions to Customers (FINRA Rule 2010)
As to Respondents TCF and Perry

41. The Department realleges and incorporates by reference paragraphs 1 through 40 above.
42. As described in paragraphs 23 through 27, by omitting and/or misrepresenting material facts to customers in connection with the procurement of their signatures on the ASAv2, Respondents failed to uphold high standards of commercial honor and just and equitable principles of trade, in violation of FINRA Rule 2010.

THIRD CAUSE OF ACTION
Falsification (FINRA Rule 2010)
As to Respondent Perry

43. The Department realleges and incorporates by reference paragraphs 1 through 42 above.
44. By causing the falsification of the documents described in paragraphs 23 through 38 and Appendix B, Perry violated FINRA Rule 2010.

FOURTH CAUSE OF ACTION
Providing Falsified Documents to FINRA (FINRA Rules 8210 and 2010)
As to Respondents TCF and Perry

45. The Department realleges and incorporates by reference paragraphs 1 through 44 above.

46. By presenting to FINRA staff the falsified documents described in paragraphs 29 through 38 in response to a request made pursuant to FINRA Rule 8210, Respondents violated FINRA Rules 8210 and 2010.

FIFTH CAUSE OF ACTION
Providing False Testimony to FINRA (FINRA Rules 8210 and 2010)
As to Respondent Perry

47. The Department realleges and incorporates by reference paragraphs 1 through 46 above.

48. On or about December 8, 2011, Perry provided sworn testimony to FINRA staff in response to a request made pursuant to FINRA Rule 8210.

49. Perry testified that she asked her customers to sign and backdate the ASAv2 in order to reflect a supposed unwritten understanding she had with those customers as of approximately January 2010. Specifically, she testified that she had informed all of those customers about the portfolio analysis report fee as of approximately January 2010, and that they had agreed to be charged the fee.

50. In fact, customers JBa, JH, KH, GJ, KJ, DK, EL, GL, LN, JN, MR, RS, CV, MV and LW had not agreed to be charged any such fee prior to Perry's request that they sign the ASAv2. Further, Perry had not previously disclosed the existence of the fee to any of those customers. Therefore, Perry's sworn testimony that she had previously notified and obtained authorization from each of her customers concerning the portfolio analysis report fee was false.

51. By providing false testimony to FINRA staff in connection with an investigation, Perry violated FINRA Rules 8210 and 2010.

SIXTH CAUSE OF ACTION
Improper Use of Customer Funds (FINRA Rules 2150 and 2010)
As to Respondent Perry

52. The Department realleges and incorporates by reference paragraphs 1 through 51 above.
53. In or about October 2010, customer DC opened an account with Respondents.
54. Perry subsequently approached DC with an opportunity to earn a 10% rate of return by lending Perry approximately \$300,000.00, which would be used to repay the then-current holder of a second mortgage on a property owned by Perry. Perry further informed DC that the new loan would be secured by a deed of trust on the property in favor of DC.
55. On or about December 29, 2010, Perry caused \$300,000.00 to be wired out of DC's securities account at TCF. Perry used the funds to pay off the above-described second mortgage.
56. At the time that Perry caused DC's funds to be wired out of her account, DC had not agreed to loan that money to Perry.
57. By borrowing funds from her customer without authorization, Perry violated FINRA Rules 2150 and 2010.

SEVENTH CAUSE OF ACTION
Borrowing from a Customer (FINRA Rules 3240 and 2010)
As to Respondent Perry

58. The Department realleges and incorporates by reference paragraphs 1 through 57 above.
59. As described above, on or about December 29, 2010, Perry borrowed approximately \$300,000.00 from DC.

60. At the time of the loan:

- a. DC was not a member of Perry's immediate family;
- b. DC was not a financial institution regularly engaged in the business of providing credit, financing or loans;
- c. DC was not an entity or person that regularly arranged or extended credit in the ordinary course of business;
- d. DC was not a registered person of the same FINRA member as Perry;
- e. The lending arrangement was not based on a personal relationship between Perry and DC; and
- f. The lending arrangement was not based on a business relationship outside of the broker-customer relationship.

61. By borrowing money from her customer under the above-described circumstances, Perry violated FINRA Rules 3240 and 2010.

EIGHTH CAUSE OF ACTION
Customer Complaint Reporting (NASD Rule 3070 and FINRA Rules 4530 and 2010)
As to Respondents TCF and Perry

62. The Department realleges and incorporates by reference paragraphs 1 through 61 above.

63. Since at least March 31, 2009, Perry has been the registered principal at TCF solely responsible for ensuring that customer complaints are timely and accurately reported to FINRA.

64. From on or about March 30, 2009 through on or about August 20, 2011, Respondents received twelve customer complaints that they did not report to FINRA in a timely

manner and four customer complaints that they did not report to FINRA at all. The table below summarizes these complaints:

Date	Customer	Due Date	Date Reported	Days Late
03/31/09	KW	04/15/09	03/15/12	1,065
07/19/09	MH	10/15/09	03/15/12	882
09/25/09	MH	10/15/09	03/15/12	882
10/30/09	MH	01/15/10	03/15/12	790
01/20/11	NS	04/15/11	*	*
03/25/11	DC	04/15/11	03/15/12	335
03/30/11	LP	04/15/11	03/15/12	335
04/14/11	MM	07/15/11	*	*
04/16/11	MM	07/15/11	03/15/12	244
04/26/11	EF	07/15/11	03/15/12	244
06/21/11	SV	07/15/11	01/11/12	180
07/14/11	CM	10/15/11	03/15/12	152
07/18/11	CW	10/15/11	*	*
07/21/11	SV	10/15/11	03/15/12	152
08/09/11	CW	10/15/11	*	*
08/20/11	EF	10/15/11	03/15/12	152

* Never reported.

65. Respondents thereby violated NASD Rule 3070 and FINRA Rule 2010 for the period from April 15, 2009 through June 30, 2011 and FINRA Rules 4530 and 2010 for the period from July 1, 2011 through the date hereof.

NINTH CAUSE OF ACTION
Failure to Properly Preserve Correspondence (Exchange Act Rule 17a-4,
NASD Rule 3110 and FINRA Rule 2010)
As to Respondents TCF and Perry

66. The Department realleges and incorporates by reference paragraphs 1 through 65 above.

67. From on or about February 1, 2010 through at least September 20, 2011, Perry was the sole person at TCF responsible for ensuring that TCF's books and records were

kept in accordance with all applicable rules and regulations of the Exchange Act of 1934.

68. From on or about February 1, 2010 through September 20, 2011, TCF, acting through Perry, preserved communications pertaining to its business using electronic storage media other than optical disk technology.
69. Respondents did not notify FINRA of their intent to employ electronic storage media to preserve such communications until on or about September 20, 2011.
70. Respondents have never provided FINRA with a representation that their selected storage media meets the conditions set forth in Exchange Act Rule 17a-4(f)(2).
71. The electronic storage media employed by Respondents did not preserve the communications exclusively in a non-rewritable, non-erasable format.
72. As a result of the foregoing conduct, TCF willfully violated Exchange Act Rule 17a-4 and also violated NASD Rule 3110 and FINRA Rule 2010.
73. By failing to ensure that TCF kept its books and records in accordance with Exchange Act Rule 17a-4, Perry violated NASD Rule 3110 and FINRA Rule 2010.

TENTH CAUSE OF ACTION
Failure to Maintain Minimum Required Net Capital (Exchange Act Rule 15c3-1
and FINRA Rule 2010)
As to Respondents TCF and Perry

74. The Department realleges and incorporates by reference paragraphs 1 through 73 above.
75. At all times relevant to this Complaint, Perry was the only Financial and Operations Principal at TCF and was solely responsible for TCF's compliance with Exchange Act Rule 15c3-1.
76. On or about December 22, 2010:

- a. TCF's net capital was approximately \$44,132.75;
- b. TCF's minimum net capital requirement was \$250,000.00; and
- c. TCF conducted a securities business, consisting of approximately two purchases of exchange traded funds for a customer account.

77. On or about March 30, 2011:

- a. TCF's net capital was approximately \$14,617.01;
- b. TCF's minimum net capital requirement was \$250,000.00; and
- c. TCF conducted a securities business, consisting of approximately nine purchases of various securities for a customer account.

78. On or about June 28, 2011:

- a. TCF's net capital was approximately \$37,611.15;
- b. TCF's minimum net capital requirement was \$250,000.00; and
- c. TCF conducted a securities business, consisting of a purchase of stock for a customer account.

79. On or about October 4, 2011:

- a. TCF's net capital was approximately \$38,063.45;
- b. TCF's minimum net capital requirement was \$250,000.00; and
- c. TCF conducted a securities business, consisting of approximately 17 purchases of an exchange-traded fund for approximately 13 customer accounts.

80. On or about November 25, 2011:

- a. TCF's net capital was approximately \$(19,579.77);
- b. TCF's minimum net capital requirement was \$250,000.00; and

c. TCF conducted a securities business, consisting of a purchase of stock for a customer account.

81. As a result of the foregoing conduct, TCF willfully violated Exchange Act Rule 15c3-1 and also violated FINRA Rule 2010.

82. By failing to ensure that TCF maintained minimum required net capital while conducting a securities business, Perry violated FINRA Rule 2010.

ELEVENTH CAUSE OF ACTION
Untimely Notice of Net Capital Deficiency (Exchange Act Rule 17a-11
and FINRA Rule 2010)
As to Respondents TCF and Perry

83. The Department realleges and incorporates by reference paragraphs 1 through 82 above.

84. At all times relevant to this Complaint, Perry was solely responsible for TCF's compliance with Exchange Act Rule 17a-11.

85. On or about December 20, 2011, FINRA staff hand-delivered to Perry written notification of the staff's determination that TCF had an ongoing net capital deficiency.

86. Respondents did not file any notice of its net capital deficiency, as required by Exchange Act Rule 17a-11, until on or about January 6, 2012.

87. By failing to timely file notice of its net capital deficiency, TCF willfully violated Exchange Act Rule 17a-11 and also violated FINRA Rule 2010.

88. By failing to timely file notice of TCF's net capital deficiency pursuant to Exchange Act Rule 17a-11, Perry violated FINRA Rule 2010.

TWELFTH CAUSE OF ACTION
Failure to Implement Anti-Money Laundering Compliance Program (NASD Rules 3011 and
2110 and FINRA Rules 3310 and 2010)
As to Respondents TCF and Perry

89. The Department realleges and incorporates by reference paragraphs 1 through 88 above.
90. From on or about October 7, 2008 through on or about March 8, 2011, on an approximately bi-weekly basis, FinCEN sent Respondents a total of approximately 73 emails. Each email stated that new 314(a) case information had been posted to FinCEN's Secure Information Sharing System (SISS).
91. As detailed in TCF's written Anti-Money Laundering Compliance Program, Perry was solely responsible for logging into SISS in response to each such email, reviewing the posted information, and conducting a search of TCF's records to determine if TCF maintained an account for or engaged in a transaction with any individual, entity or organization listed in the SISS posting.
92. As of March 15, 2011, Respondents had not reviewed the 314(a) case information pertaining to 67 of the 73 emails they received from FinCEN.
93. By failing to search TCF's records in response to 314(a) requests from FinCEN, Respondents violated NASD Rules 3011 and 2110 for the period from October 7, 2008 through December 14, 2008, NASD Rule 3011 and FINRA Rule 2010 for the period from December 15, 2008 through December 31, 2009, and FINRA Rules 3310 and 2010 for the period from January 1, 2010 through March 15, 2011.

THIRTEENTH CAUSE OF ACTION
Providing False Information and Documents to FINRA (FINRA Rule 2010)
As to Respondents TCF and Perry

94. The Department realleges and incorporates by reference paragraphs 1 through 93 above.
95. From on or about November 29, 2010 through on or about December 14, 2010, FINRA staff conducted field work in connection with a routine cycle examination of TCF, consisting of an onsite review of information and documents at TCF's place of business.
96. While onsite, Respondents provided FINRA staff with printouts of eight emails in response to the staff's request for documents evidencing TCF's compliance with its obligations pertaining to 314(a) requests from FinCEN.
97. At the bottom of each printout, Perry had handwritten, "Checked per date and no positive matches."
98. As of December 14, 2010, Respondents had not logged into SISS to review 314(a) case information pertaining to five of the emails. Also as of December 14, 2010, Respondents had logged into SISS to review 314(a) case information related to two other emails, but on dates subsequent to receipt of the emails. The table below summarizes the email dates and SISS login dates:

Email Date	SISS Accessed
05/04/10	*
05/06/10	*
06/01/10	*
06/15/10	*
09/21/10	09/21/10
10/19/10	*
11/02/10	11/29/10
11/16/10	11/29/10

* Not accessed as of December 14, 2010.

99. On or about December 14, 2010, FINRA staff provided Respondents with an Exit Meeting Report. The report notified Respondents that the staff had completed the field work portion of its routine cycle examination and listed various exceptions found as a result of that field work. One of the exceptions in the report was a finding that TCF had failed to review information in connection with 27 of 29 FinCEN requests sent to TCF between January 12, 2010 and November 16, 2010.
100. On or about February 17, 2011, FINRA staff received a letter from Respondents in response to the Exit Meeting Report. With respect to the FinCEN-related exception, Respondents wrote, “The Reports sent by FinCen [sic] and as contained on the enclosed list – were downloaded and reviewed.” Although there was no actual list included, enclosed with the letter were printouts of 16 emails received from FinCEN between February 23, 2010 and January 25, 2011. Some of these printouts were duplicates of the emails provided to the staff between November 29, 2010 and December 14, 2010. However, none of the emails enclosed with the letter bore any handwriting.
101. As of February 17, 2011, Respondents had not logged into SISS to review 314(a) case information pertaining to 13 of those emails.
102. By making material misrepresentations to FINRA staff concerning TCF’s review of FinCEN information requests, Respondents violated FINRA Rule 2010.

FOURTEENTH CAUSE OF ACTION
Failure to Update Form U4 (FINRA By-Laws, Article V, Section 2 and FINRA Rule 2010)
As to Respondent Perry

103. The Department realleges and incorporates by reference paragraphs 1 through 102 above.
104. On or about December 19, 2011, Perry provided sworn testimony to FINRA staff. During her testimony, the staff asked Perry about a civil judgment against her in favor of her gardener in the amount of approximately \$1,120.00 , which was entered on or about June 2, 2010.
105. Perry testified that she could not recall with specificity when she became aware of the judgment. She further testified that she could not recall whether or not the judgment had been satisfied.
106. In fact, as of December 19, 2011, the judgment remained unsatisfied.
107. When the staff questioned Perry as to why she had not updated her Form U4 to reflect the judgment, she testified that she was unaware of her obligation to do so.
108. Perry did not update her Form U4 to disclose the judgment until on or about March 20, 2012. However, she had previously satisfied the judgment on or about March 1, 2012.
109. By willfully failing to update her Form U4 to disclose an unsatisfied judgment within 30 days of becoming aware of it, Perry violated Article V, Section 2 of the FINRA By-Laws and FINRA Rule 2010.

FIFTEENTH CAUSE OF ACTION
Failure to Accurately Update Form U4 (FINRA By-Laws, Article V, Section 2
and FINRA Rules 1122 and 2010)
As to Respondent Perry

110. The Department realleges and incorporates by reference paragraphs 1 through 109 above.
111. On or about February 23, 2012, FINRA staff notified Perry in writing that she was the subject of an investigation (the Wells notice).
112. The Wells notice stated that FINRA staff had made a preliminary determination to recommend disciplinary action against Perry for the following potential violations: conversion, falsification, providing false testimony to FINRA, failure to amend Form U4, borrowing from a customer, unauthorized taking/misuse of customer funds, providing false information and documents to FINRA, misrepresentations and omissions to customers, complaint reporting, anti-money laundering compliance program, untimely notice of net capital deficiency, failure to maintain minimum required net capital and failure to properly preserve electronic correspondence.
113. On or about April 2, 2012, Perry updated her Form U4 in response to the Wells notice. Despite the numerous violations listed in the Wells notice, however, Perry's update simply read, "FINRA is investigating fee charges to customer, borrowing from customer and testimony."
114. By willfully filing a materially incomplete and misleading update to her Form U4, Perry violated Article V, Section 2 of the FINRA By-Laws and FINRA Rules 1122 and 2010.

SIXTEENTH CAUSE OF ACTION
Failure to Provide Information and Documents to FINRA (FINRA Rules 8210 and 2010)
As to Respondents TCF and Perry

115. The Department realleges and incorporates by reference paragraphs 1 through 114 above.
116. On or about April 24, 2012, FINRA staff sent Respondents a request, pursuant to FINRA Rule 8210, pertaining to Perry's Form U4 amendment disclosing the Wells notice (First Request). Specifically, the staff requested a copy of the signed Form U4 amendment, along with a written explanation from Perry as to why she did not disclose all of the potential violations listed in the Wells notice. The First Request was sent via first class mail, certified mail and facsimile to Respondents' attorney at the time (Counsel).
117. On or about April 24, 2012, Counsel informed FINRA staff in writing that Perry would be responding directly to the staff concerning the First Request.
118. On or about April 25, 2012, Counsel informed FINRA staff in writing that she and her firm did not currently represent Respondents, and that subsequent information requests should be sent to Respondents directly.
119. Although the due date for the First Request was April 27, 2012, Respondents failed to provide any of the requested information or documents.
120. On or about May 3, 2012, FINRA staff sent Respondents a second request, pursuant to FINRA Rule 8210, for the information and documents originally requested on April 24, 2012 (Second Request). The Second Request was sent via first class mail to Perry at her last known residential address, as listed in the Central Registration Depository (CRD), and to TCF at its last known business address, as listed in CRD.

121. Although the due date for the Second Request was May 7, 2012, Respondents failed to provide any of the requested information or documents.
122. By failing to provide FINRA staff with information and documents requested in connection with an investigation, Respondents violated FINRA Rules 8210 and 2010.

RELIEF REQUESTED

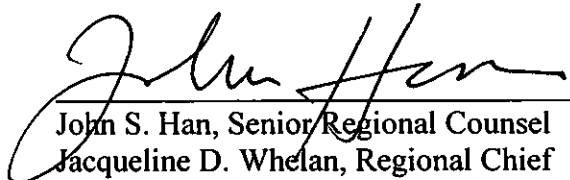
WHEREFORE, the Department respectfully requests that the Panel:

- A. order that one or more of the sanctions provided under FINRA Rule 8310(a) be imposed, including that the Respondents be required to disgorge fully any and all ill-gotten gains and/or make full and complete restitution, together with interest;
- B. order that the Respondents bear such costs of proceeding as are deemed fair and appropriate under the circumstances in accordance with FINRA Rule 8330; and
- C. make specific findings that Respondent Perry's conduct, as alleged in the Fourteenth and Fifteenth Causes of Action, was willful; the omitted information was material; and, the omission to state material facts was on a Form U4 application; and

- D. make specific findings that Respondent TCF willfully violated Rules 15c3-1, 17a-4 and 17a-11 of the Exchange Act.

FINRA DEPARTMENT OF ENFORCEMENT

Date: 06/19/2012


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Appendix A

ACCOUNT	DATE	AMOUNT	DESCRIPTION	
GJ (Account 1)	02/05/09	\$29.75	FEE CHARGE	1ST Q PERF REPORT
GJ (Account 1)	02/05/09	\$29.75	FEE CHARGE	2ND Q PERF REPORT
GJ (Account 1)	02/05/09	\$29.75	FEE CHARGE	3RD Q PERF REPORT
GJ (Account 2)	02/05/09	\$29.75	FEE CHARGE	3RD Q PERF REPORT
GJ (Account 2)	02/05/09	\$29.77	FEE CHARGE	1ST Q PERF REPORT
GJ (Account 2)	02/05/09	\$31.77	FEE CHARGE	2ND Q PERF REPORT
KJ (Account 2)	02/05/09	\$29.75	FEE CHARGE	1ST Q PERF REPORT
KJ (Account 2)	02/05/09	\$29.75	FEE CHARGE	2ND Q PERF REPORT
KJ (Account 2)	02/05/09	\$29.75	FEE CHARGE	3RD Q PERF REPORT
KJ (Account 3)	02/05/09	\$29.75	FEE CHARGE	1ST Q PERF REPORT
KJ (Account 3)	02/05/09	\$29.75	FEE CHARGE	2ND Q PERF REPORT
KJ (Account 3)	02/05/09	\$29.75	FEE CHARGE	3RD Q PERF REPORT
DK (Account 2)	02/05/09	\$28.75	FEE CHARGE	1ST Q PERF REPORT
DK (Account 2)	02/05/09	\$29.16	FEE CHARGE	3RD Q PERF REPORT
DK (Account 2)	02/05/09	\$31.08	FEE CHARGE	2ND Q PERF REPORT
SV (Account 1)	02/05/09	\$40.98	FEE CHARGE	3RD Q PERF REPORT
SV (Account 1)	02/05/09	\$43.33	FEE CHARGE	2ND Q PERF REPORT
SV (Account 1)	02/05/09	\$44.29	FEE CHARGE	1ST Q PERF REPORT
SV (Account 2)	02/05/09	\$36.48	FEE CHARGE	3RD Q PERF REPORT
SV (Account 2)	02/05/09	\$39.37	FEE CHARGE	2ND Q PERF REPORT
SV (Account 2)	02/05/09	\$39.99	FEE CHARGE	1ST Q PERF REPORT
SV (Account 3)	02/05/09	\$28.75	FEE CHARGE	1ST Q PERF REPORT
SV (Account 3)	02/05/09	\$28.75	FEE CHARGE	2ND Q PERF REPORT
SV (Account 3)	02/05/09	\$28.75	FEE CHARGE	3RD Q PERF REPORT
LW	02/05/09	\$33.05	FEE CHARGE	3RD Q PERF REPORT
LW	02/05/09	\$35.33	FEE CHARGE	1ST Q PERF REPORT
LW	02/05/09	\$35.48	FEE CHARGE	2ND Q PERF REPORT
KJ (Account 2)	05/18/09	\$25.50	FEE CHARGE	3RD Q ADV ADJ
DK (Account 2)	05/18/09	\$131.24	FEE CHARGE	3RD Q ADV ADJ
KD	07/27/09	\$36.44	FEE CHARGE	3RD Q ADV FEE
DK (Account 1)	09/10/09	\$509.36	FEE CHARGE	2ND Q ADV FEE
DK (Account 2)	12/29/09	\$97.30	FEE CHARGE	YEAR END
RS	12/29/09	\$97.30	FEE CHARGE	YEAR END
GS	12/29/09	\$97.30	FEE CHARGE	YEAR END
SV (Account 1)	12/29/09	\$97.30	FEE CHARGE	YEAR END
SV (Account 3)	12/29/09	\$97.30	FEE CHARGE	YEAR END
JBa	01/08/10	\$97.30	FEE CHARGE	YEAR END
PG (Account 1)	01/08/10	\$97.30	FEE CHARGE	YEAR END
PG (Account 2)	01/08/10	\$97.30	FEE CHARGE	YEAR END
JH	01/08/10	\$97.30	FEE CHARGE	YEAR END
KH	01/08/10	\$97.30	FEE CHARGE	YEAR END
GJ (Account 1)	01/08/10	\$97.30	FEE CHARGE	YEAR END
GJ (Account 2)	01/08/10	\$97.30	FEE CHARGE	YEAR END
KJ (Account 2)	01/08/10	\$97.30	FEE CHARGE	YEAR END
KJ (Account 3)	01/08/10	\$97.30	FEE CHARGE	YEAR END
DK (Account 1)	01/08/10	\$97.30	FEE CHARGE	YEAR END
DK (Account 2)	01/08/10	\$97.30	FEE CHARGE	YEAR END
EL & GL	01/08/10	\$97.30	FEE CHARGE	YEAR END
EL	01/08/10	\$97.30	FEE CHARGE	YEAR END
GL	01/08/10	\$97.30	FEE CHARGE	YEAR END
LN	01/08/10	\$97.30	FEE CHARGE	YEAR END
JN (Account 1)	01/08/10	\$97.30	FEE CHARGE	YEAR END
JN (Account 3)	01/08/10	\$97.30	FEE CHARGE	YEAR END
JN (Account 3)	01/08/10	\$97.30	FEE CHARGE	YEAR END
SN (Account 2)	01/08/10	\$97.30	FEE CHARGE	YEAR END
CR	01/08/10	\$97.30	FEE CHARGE	YEAR END
RS	01/08/10	\$97.30	FEE CHARGE	YEAR END
GS	01/08/10	\$97.30	FEE CHARGE	YEAR END
SV (Account 1)	01/08/10	\$97.30	MARGIN TO CASH A/C	
SV (Account 2)	01/08/10	\$97.30	FEE CHARGE	YEAR END
SV (Account 3)	01/08/10	\$97.30	FEE CHARGE	YEAR END
CV & MV	01/08/10	\$97.30	FEE CHARGE	YEAR END
GJ (Account 1)	03/18/10	\$20.00	FEE CHARGE	ON-LINE ACCESS
GJ (Account 2)	03/18/10	\$20.00	FEE CHARGE	ON-LINE ACCESS
KJ (Account 2)	03/18/10	\$20.00	FEE CHARGE	ON-LINE ACCESS

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ACCOUNT	DATE	AMOUNT	DESCRIPTION	
KJ (Account 3)	03/18/10	\$20.00	FEE CHARGE	ON-LINE ACCESS
DL (Account 2)	04/12/10	\$3,765.38	FEE CHARGE	
DL (Account 2)	04/29/10	\$1,879.00	FEE CHARGE	ADJ QUARTER
DL (Account 2)	05/03/10	\$3,191.81	FEE CHARGE	
GS	05/05/10	\$49.50	FEE CHARGE	WIRE
LT	05/14/10	\$685.64	FEE CHARGE	
DL (Account 2)	06/03/10	\$439.60	FEE CHARGE	
LT	06/03/10	\$619.00	FEE CHARGE	
DL (Account 3)	06/10/10	\$2,976.58	FEE CHARGE	
RS	06/11/10	\$156.90	FEE CHARGE	
JBa & DK	06/15/10	\$59.63	FEE CHARGE	
JBa	06/15/10	\$59.63	FEE CHARGE	
KD	06/15/10	\$59.63	FEE CHARGE	
PG (Account 2)	06/15/10	\$59.63	FEE CHARGE	
JH	06/15/10	\$59.63	FEE CHARGE	
KH	06/15/10	\$59.63	FEE CHARGE	
GJ (Account 1)	06/15/10	\$59.63	FEE CHARGE	
GJ (Account 2)	06/15/10	\$59.63	FEE CHARGE	
KJ (Account 2)	06/15/10	\$59.63	FEE CHARGE	
KJ (Account 3)	06/15/10	\$59.63	FEE CHARGE	
DKr	06/15/10	\$59.63	FEE CHARGE	
DL (Account 3)	06/15/10	\$159.63	FEE CHARGE	
EL	06/15/10	\$59.63	FEE CHARGE	
GL	06/15/10	\$59.63	FEE CHARGE	
CM	06/15/10	\$59.63	FEE CHARGE	
LN	06/15/10	\$59.63	FEE CHARGE	
JN (Account 3)	06/15/10	\$59.63	FEE CHARGE	
SN (Account 2)	06/15/10	\$59.63	FEE CHARGE	
JP (Account 1)	06/15/10	\$59.63	FEE CHARGE	
JP (Account 2)	06/15/10	\$59.63	FEE CHARGE	
CR	06/15/10	\$59.63	FEE CHARGE	
LS	06/15/10	\$59.63	FEE CHARGE	
GS	06/15/10	\$59.63	FEE CHARGE	
SV (Account 1)	06/15/10	\$59.63	FEE CHARGE	
SV (Account 2)	06/15/10	\$59.63	FEE CHARGE	
SV (Account 3)	06/15/10	\$159.63	FEE CHARGE	
LW	06/15/10	\$59.63	FEE CHARGE	
JY	06/15/10	\$59.63	FEE CHARGE	
PG (Account 2)	09/07/10	\$299.00	FEE CHARGE	
JBa & DK	09/16/10	\$92.50	FEE CHARGE	
JBa	09/16/10	\$62.50	FEE CHARGE	
KD	09/16/10	\$62.50	FEE CHARGE	
PG (Account 2)	09/16/10	\$62.50	FEE CHARGE	
JH	09/16/10	\$62.50	FEE CHARGE	
KH	09/16/10	\$62.50	FEE CHARGE	
GJ (Account 1)	09/16/10	\$292.50	FEE CHARGE	
GJ (Account 2)	09/16/10	\$292.50	FEE CHARGE	
KJ (Account 1)	09/16/10	\$62.50	FEE CHARGE	
KJ (Account 2)	09/16/10	\$192.50	FEE CHARGE	
KJ (Account 3)	09/16/10	\$62.50	FEE CHARGE	
DK (Account 2)	09/16/10	\$392.50	FEE CHARGE	
DKr	09/16/10	\$292.50	FEE CHARGE	
DL (Account 3)	09/16/10	\$1,527.51	FEE CHARGE	
EL & GL	09/16/10	\$589.16	FEE CHARGE	
EL	09/16/10	\$392.50	FEE CHARGE	
GL	09/16/10	\$392.65	FEE CHARGE	
CM	09/16/10	\$62.50	FEE CHARGE	
LN	09/16/10	\$62.50	FEE CHARGE	
JN (Account 1)	09/16/10	\$192.50	FEE CHARGE	
JN (Account 3)	09/16/10	\$192.50	FEE CHARGE	
SN (Account 1)	09/16/10	\$62.50	FEE CHARGE	
SN (Account 2)	09/16/10	\$92.50	FEE CHARGE	
JP (Account 1)	09/16/10	\$192.50	FEE CHARGE	
JP (Account 2)	09/16/10	\$192.50	FEE CHARGE	
MR (Account 1)	09/16/10	\$62.50	FEE CHARGE	

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ACCOUNT	DATE	AMOUNT	DESCRIPTION	
MR (Account 2)	09/16/10	\$167.14	FEE CHARGE	
CR	09/16/10	\$92.50	FEE CHARGE	
RS	09/16/10	\$589.16	FEE CHARGE	
LS	09/16/10	\$92.50	FEE CHARGE	
GS	09/16/10	\$192.50	FEE CHARGE	
LT	09/16/10	\$392.50	FEE CHARGE	
JV	09/16/10	\$62.50	FEE CHARGE	
SV (Account 1)	09/16/10	\$392.65	FEE CHARGE	
SV (Account 2)	09/16/10	\$392.65	FEE CHARGE	
SV (Account 3)	09/16/10	\$292.50	FEE CHARGE	
CV & MV	09/16/10	\$192.50	FEE CHARGE	
LW	09/16/10	\$392.65	FEE CHARGE	
JY	09/16/10	\$92.50	FEE CHARGE	
DL (Account 3)	09/29/10	\$961.38	FEE CHARGE	EXECUTION FEES
KD	10/01/10	\$56.20	FEE CHARGE	2ND Q ADV FEE
KD	10/01/10	\$56.26	FEE CHARGE	1ST Q ADV FEE
JP (Account 2)	10/01/10	\$217.70	FEE CHARGE	2ND Q ADV FEE
DK (Account 2)	10/19/10	\$550.00	FEE CHARGE	3RD Q ADV
DKr	10/28/10	\$299.00	FEE CHARGE	ACCOUNT CLOSE
KD	11/16/10	\$55.91	FEE CHARGE	3RD Q ADV FEE
DL (Account 3)	11/23/10	\$99.00	FEE CHARGE	ACCOUNT CLOSE
DL (Account 3)	11/23/10	\$399.00	FEE CHARGE	ACCOUNT CLOSE
RS	12/14/10	\$199.00	MISCELLANEOUS ADJ	
DK (Account 2)	12/15/10	\$349.00	COMMISSION ADJ	
GL	12/15/10	\$349.00	COMMISSION ADJ	
LW	12/15/10	\$349.00	COMMISSION ADJ	
KD	12/21/10	\$299.00	FEE CHARGE	
GJ (Account 1)	12/22/10	\$399.00	FEE CHARGE	YEAR END PORT
GJ (Account 2)	12/22/10	\$399.00	FEE CHARGE	YEAR END PORT
KJ (Account 2)	12/22/10	\$299.00	FEE CHARGE	YEAR END PORT
DK (Account 2)	12/22/10	\$399.00	FEE CHARGE	YEAR END PORT
EL	12/22/10	\$399.00	FEE CHARGE	YEAR END PORT
GL	12/22/10	\$399.00	FEE CHARGE	YEAR END PORT
JN (Account 3)	12/22/10	\$299.00	FEE CHARGE	YEAR END PORT
SN (Account 2)	12/22/10	\$199.00	FEE CHARGE	YEAR END PORT
JP (Account 2)	12/22/10	\$299.00	FEE CHARGE	YEAR END PORT
CR	12/22/10	\$199.00	FEE CHARGE	YEAR END PORT
RS	12/22/10	\$399.00	FEE CHARGE	YEAR END PORT
LW	12/22/10	\$399.00	FEE CHARGE	YEAR END PORT
JBa & DK	12/27/10	\$199.00	FEE CHARGE	YEAR END PORT
JBa	12/27/10	\$79.00	FEE CHARGE	YEAR END PORT
DC	12/27/10	\$499.00	FEE CHARGE	YEAR END PORT
KD	12/27/10	\$99.00	FEE CHARGE	YEAR END PORT
JH	12/27/10	\$99.00	FEE CHARGE	YEAR END PORT
KH	12/27/10	\$99.00	FEE CHARGE	YEAR END PORT
KJ (Account 1)	12/27/10	\$39.00	FEE CHARGE	YEAR END PORT
KJ (Account 3)	12/27/10	\$79.00	FEE CHARGE	YEAR END PORT
DL (Account 3)	12/27/10	\$99.00	FEE CHARGE	YEAR END PORT
EL & GL	12/27/10	\$399.00	FEE CHARGE	YEAR END PORT
CM	12/27/10	\$99.00	FEE CHARGE	YEAR END PORT
LN	12/27/10	\$199.00	FEE CHARGE	YEAR END PORT
JN (Account 1)	12/27/10	\$199.00	FEE CHARGE	YEAR END PORT
SN (Account 1)	12/27/10	\$199.00	FEE CHARGE	YEAR END PORT
JP (Account 1)	12/27/10	\$199.00	FEE CHARGE	YEAR END PORT
GS	12/27/10	\$199.00	FEE CHARGE	YEAR END PORT
LT	12/27/10	\$199.00	FEE CHARGE	YEAR END PORT
JV	12/27/10	\$99.00	FEE CHARGE	YEAR END PORT
JY	12/27/10	\$199.00	FEE CHARGE	YEAR END PORT
JP (Account 1)	01/12/11	\$499.00	FEE CHARGE	CLOSE
JP (Account 2)	01/12/11	\$499.00	FEE CHARGE	CLOSE
KD	01/28/11	\$34.79	FEE CHARGE	AD FEE 4THQ
LS	01/28/11	\$127.39	FEE CHARGE	
LW	01/28/11	\$880.29	FEE CHARGE	AD FEE 4THQ
JN (Account 2)	01/31/11	\$250.00	FEE CHARGE	4THQ ADV FEE
JBa & DK	03/09/11	\$99.00	COMMISSION ADJ	

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ACCOUNT	DATE	AMOUNT	DESCRIPTION	
GJ (Account 1)	03/09/11	\$299.00	COMMISSION ADJ	
GJ (Account 2)	03/09/11	\$499.00	COMMISSION ADJ	
KJ (Account 2)	03/09/11	\$299.00	COMMISSION ADJ	
DK (Account 2)	03/09/11	\$499.00	COMMISSION ADJ	
EL	03/09/11	\$499.00	COMMISSION ADJ	
GL	03/09/11	\$499.00	COMMISSION ADJ	
JN (Account 3)	03/09/11	\$299.00	COMMISSION ADJ	
CR	03/09/11	\$299.00	COMMISSION ADJ	
RS	03/09/11	\$499.00	COMMISSION ADJ	
CV & MV	03/09/11	\$299.00	COMMISSION ADJ	
LW	03/09/11	\$499.00	COMMISSION ADJ	
JBa	03/14/11	\$50.00	COMMISSION ADJ	
DC	03/14/11	\$399.00	COMMISSION ADJ	
JH	03/14/11	\$99.00	COMMISSION ADJ	
KH	03/14/11	\$199.00	COMMISSION ADJ	
KJ (Account 3)	03/14/11	\$99.00	COMMISSION ADJ	
DK (Account 1)	03/14/11	\$499.00	COMMISSION ADJ	
CM	03/14/11	\$50.00	COMMISSION ADJ	
LN	03/14/11	\$50.00	COMMISSION ADJ	
JN (Account 1)	03/14/11	\$399.00	COMMISSION ADJ	
JN (Account 2)	03/14/11	\$299.00	COMMISSION ADJ	
GS	03/14/11	\$399.00	COMMISSION ADJ	
LT	03/14/11	\$99.00	COMMISSION ADJ	
JV	03/14/11	\$50.00	COMMISSION ADJ	
JY	03/14/11	\$299.00	COMMISSION ADJ	
CM	04/01/11	\$299.00	FEE CHARGE	CLOSE
LS	04/01/11	\$299.00	FEE CHARGE	CLOSE
GS	04/04/11	\$213.78	COMMISSION ADJ	
JBa & DK	04/26/11	\$192.30	COMMISSION ADJ	
KH	04/26/11	\$292.87	COMMISSION ADJ	
GJ (Account 1)	04/26/11	\$435.76	COMMISSION ADJ	
GJ (Account 2)	04/26/11	\$945.37	COMMISSION ADJ	
KJ (Account 2)	04/26/11	\$613.67	COMMISSION ADJ	
KJ (Account 3)	04/26/11	\$212.10	COMMISSION ADJ	
DK (Account 1)	04/26/11	\$237.90	COMMISSION ADJ	
DK (Account 2)	04/26/11	\$1,678.23	COMMISSION ADJ	
EL & GL	04/26/11	\$1,293.60	COMMISSION ADJ	
EL	04/26/11	\$2,014.65	COMMISSION ADJ	
GL	04/26/11	\$2,340.98	COMMISSION ADJ	
CM	04/26/11	\$292.76	COMMISSION ADJ	
JN (Account 1)	04/26/11	\$352.96	COMMISSION ADJ	
JN (Account 3)	04/26/11	\$592.56	COMMISSION ADJ	
MR (Account 2)	04/26/11	\$654.87	COMMISSION ADJ	
CR	04/26/11	\$392.54	COMMISSION ADJ	
RS	04/26/11	\$1,379.43	COMMISSION ADJ	
GS	04/26/11	\$96.51	COMMISSION ADJ	
LT	04/26/11	\$292.87	COMMISSION ADJ	
JV	04/26/11	\$197.45	COMMISSION ADJ	
SV (Account 2)	04/26/11	\$972.30	COMMISSION ADJ	
CV & MV	04/26/11	\$252.96	COMMISSION ADJ	
LW	04/26/11	\$1,172.89	COMMISSION ADJ	
JY	04/26/11	\$292.30	COMMISSION ADJ	
DC	05/19/11	\$398.43	COMMISSION ADJ	
GS	05/19/11	\$399.57	FEE CHARGE	CLOSE
DC	05/25/11	\$345.67	COMMISSION ADJ	
DC	05/25/11	\$499.56	COMMISSION ADJ	CLOSE
GJ (Account 2)	06/01/11	\$126.45	COMMISSION ADJ	
DK (Account 1)	06/01/11	\$532.12	COMMISSION ADJ	
EL & GL	06/01/11	\$582.67	COMMISSION ADJ	
GL	06/01/11	\$535.45	COMMISSION ADJ	
MR (Account 2)	06/01/11	\$439.67	COMMISSION ADJ	
RS	06/01/11	\$694.23	COMMISSION ADJ	
GS	06/01/11	\$387.54	COMMISSION ADJ	
EL & GL	06/22/11	\$365.97	COMMISSION ADJ	
JBa	06/28/11	\$79.20	COMMISSION ADJ	

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ACCOUNT	DATE	AMOUNT	DESCRIPTION	
JH	06/28/11	\$79.20	COMMISSION ADJ	
KH	06/28/11	\$179.20	COMMISSION ADJ	
DK (Account 1)	06/28/11	\$239.60	COMMISSION ADJ	
LN	06/28/11	\$179.20	COMMISSION ADJ	
JN (Account 2)	06/28/11	\$239.60	COMMISSION ADJ	
SN (Account 2)	06/28/11	\$79.20	COMMISSION ADJ	
MR (Account 2)	06/28/11	\$279.30	COMMISSION ADJ	
GS	06/28/11	\$404.78	COMMISSION ADJ	
JV	06/28/11	\$79.20	COMMISSION ADJ	
JY	06/28/11	\$79.20	COMMISSION ADJ	
LN	06/29/11	\$79.20	COMMISSION ADJ	
JBa & DK	07/11/11	\$297.20	COMMISSION ADJ	
GJ (Account 1)	07/11/11	\$284.78	COMMISSION ADJ	
KJ (Account 2)	07/11/11	\$289.32	COMMISSION ADJ	
KJ (Account 3)	07/11/11	\$237.90	COMMISSION ADJ	
CM	07/11/11	\$197.98	COMMISSION ADJ	
JN (Account 1)	07/11/11	\$236.90	COMMISSION ADJ	
JN (Account 3)	07/11/11	\$297.43	COMMISSION ADJ	
CV & MV	07/11/11	\$177.40	COMMISSION ADJ	
JBa & DK	08/29/11	\$99.00	FEE CHARGE	2010 YEAR REPORT
JBa	08/29/11	\$50.00	FEE CHARGE	2010 YEAR REPORT
DC	08/29/11	\$399.00	FEE CHARGE	2010 YEAR REPORT
JH	08/29/11	\$99.00	FEE CHARGE	2010 YEAR REPORT
KH	08/29/11	\$199.00	FEE CHARGE	2010 YEAR REPORT
GJ (Account 1)	08/29/11	\$299.00	FEE CHARGE	2010 YEAR REPORT
GJ (Account 2)	08/29/11	\$499.00	FEE CHARGE	2010 YEAR REPORT
KJ (Account 2)	08/29/11	\$299.00	FEE CHARGE	2010 YEAR REPORT
KJ (Account 3)	08/29/11	\$99.00	FEE CHARGE	2010 YEAR REPORT
DK (Account 1)	08/29/11	\$499.00	FEE CHARGE	2010 YEAR REPORT
DK (Account 2)	08/29/11	\$499.00	FEE CHARGE	2010 YEAR REPORT
EL & GL	08/29/11	\$499.00	FEE CHARGE	YEAR-END REPORT 2010
EL	08/29/11	\$499.00	FEE CHARGE	2010 YEAR REPORT
GL	08/29/11	\$499.00	FEE CHARGE	2010 YEAR REPORT
CM	08/29/11	\$50.00	FEE CHARGE	2010 YEAR REPORT
LN	08/29/11	\$50.00	FEE CHARGE	2010 YEAR REPORT
JN (Account 1)	08/29/11	\$399.00	FEE CHARGE	2010 YEAR REPORT
JN (Account 2)	08/29/11	\$299.00	FEE CHARGE	2010 YEAR REPORT
JN (Account 3)	08/29/11	\$299.00	FEE CHARGE	2010 YEAR REPORT
MR (Account 2)	08/29/11	\$499.00	FEE CHARGE	YEAR-END REPORT 2010
CR	08/29/11	\$299.00	FEE CHARGE	2010 YEAR REPORT
RS	08/29/11	\$499.00	FEE CHARGE	2010 YEAR REPORT
GS	08/29/11	\$399.00	FEE CHARGE	2010 YEAR REPORT
LT	08/29/11	\$99.00	FEE CHARGE	2010 YEAR REPORT
JV	08/29/11	\$50.00	FEE CHARGE	2010 YEAR REPORT
LW	08/29/11	\$499.00	FEE CHARGE	2010 YEAR REPORT
LW	08/29/11	\$499.00	FEE CHARGE	YEAR-END REPORT 2010
JY	08/29/11	\$299.00	FEE CHARGE	2010 YEAR REPORT
JBa & DK	08/30/11	(\$99.00)	COMMISSION ADJ	
JBa	08/30/11	(\$50.00)	COMMISSION ADJ	
DC	08/30/11	(\$399.00)	COMMISSION ADJ	
JH	08/30/11	(\$99.00)	COMMISSION ADJ	
KH	08/30/11	(\$199.00)	COMMISSION ADJ	
GJ (Account 1)	08/30/11	(\$299.00)	COMMISSION ADJ	
GJ (Account 2)	08/30/11	(\$499.00)	COMMISSION ADJ	
KJ (Account 2)	08/30/11	(\$299.00)	COMMISSION ADJ	
KJ (Account 3)	08/30/11	(\$99.00)	COMMISSION ADJ	
DK (Account 1)	08/30/11	(\$499.00)	COMMISSION ADJ	
DK (Account 2)	08/30/11	(\$499.00)	COMMISSION ADJ	
EL	08/30/11	(\$499.00)	COMMISSION ADJ	
GL	08/30/11	(\$499.00)	COMMISSION ADJ	
CM	08/30/11	(\$50.00)	COMMISSION ADJ	
LN	08/30/11	(\$50.00)	COMMISSION ADJ	
JN (Account 1)	08/30/11	(\$399.00)	COMMISSION ADJ	
JN (Account 2)	08/30/11	(\$299.00)	COMMISSION ADJ	
JN (Account 3)	08/30/11	(\$299.00)	COMMISSION ADJ	

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ACCOUNT	DATE	AMOUNT	DESCRIPTION	
CR	08/30/11	(\$299.00)	COMMISSION ADJ	
RS	08/30/11	(\$499.00)	COMMISSION ADJ	
GS	08/30/11	(\$399.00)	COMMISSION ADJ	
LT	08/30/11	(\$99.00)	COMMISSION ADJ	
JV	08/30/11	(\$50.00)	COMMISSION ADJ	
LW	08/30/11	(\$499.00)	COMMISSION ADJ	
JY	08/30/11	(\$299.00)	COMMISSION ADJ	
JBa & DK	09/01/11	(\$192.30)	COMMISSION ADJ	
JBa & DK	09/01/11	\$192.30	FEE CHARGE	2011 REPORTING
KH	09/01/11	(\$292.87)	COMMISSION ADJ	
KH	09/01/11	\$292.87	FEE CHARGE	2011 REPORTING
GJ (Account 1)	09/01/11	(\$435.76)	COMMISSION ADJ	
GJ (Account 1)	09/01/11	\$435.76	FEE CHARGE	2011 REPORTING
GJ (Account 2)	09/01/11	(\$945.37)	COMMISSION ADJ	
GJ (Account 2)	09/01/11	\$945.37	FEE CHARGE	2011 REPORTING
KJ (Account 2)	09/01/11	(\$613.67)	COMMISSION ADJ	
KJ (Account 2)	09/01/11	\$613.67	FEE CHARGE	2011 REPORTING
KJ (Account 3)	09/01/11	(\$212.10)	COMMISSION ADJ	
KJ (Account 3)	09/01/11	\$212.10	FEE CHARGE	2011 REPORTING
DK (Account 1)	09/01/11	(\$237.90)	COMMISSION ADJ	
DK (Account 1)	09/01/11	\$237.90	FEE CHARGE	2011 REPORTING
DK (Account 2)	09/01/11	(\$1,678.23)	COMMISSION ADJ	
DK (Account 2)	09/01/11	\$1,678.23	FEE CHARGE	2011 REPORTING
EL & GL	09/01/11	(\$1,293.60)	COMMISSION ADJ	
EL & GL	09/01/11	\$1,293.60	FEE CHARGE	2011 REPORTING
EL	09/01/11	(\$2,014.65)	COMMISSION ADJ	
EL	09/01/11	\$1,500.00	FEE CHARGE	2011 REPORTING
GL	09/01/11	(\$2,340.98)	COMMISSION ADJ	
GL	09/01/11	\$1,500.00	FEE CHARGE	2011 REPORTING
CM	09/01/11	(\$292.76)	COMMISSION ADJ	
CM	09/01/11	\$292.76	FEE CHARGE	2011 REPORTING
JN (Account 1)	09/01/11	(\$352.96)	COMMISSION ADJ	
JN (Account 1)	09/01/11	\$352.96	FEE CHARGE	2011 REPORTING
JN (Account 3)	09/01/11	(\$592.56)	COMMISSION ADJ	
JN (Account 3)	09/01/11	\$592.56	FEE CHARGE	2011 REPORTING
MR (Account 2)	09/01/11	(\$654.87)	COMMISSION ADJ	
MR (Account 2)	09/01/11	\$654.87	FEE CHARGE	2011 REPORTING
CR	09/01/11	(\$392.54)	COMMISSION ADJ	
CR	09/01/11	\$392.54	FEE CHARGE	2011 REPORTING
RS	09/01/11	(\$1,379.43)	COMMISSION ADJ	
RS	09/01/11	\$1,379.43	FEE CHARGE	2011 REPORTING
LS	09/01/11	\$117.63	FEE CHARGE	2011 REPORTING
GS	09/01/11	(\$96.51)	COMMISSION ADJ	
GS	09/01/11	(\$213.78)	COMMISSION ADJ	
GS	09/01/11	\$96.51	FEE CHARGE	2011 REPORTING
GS	09/01/11	\$213.78	FEE CHARGE	2011 REPORTING
LT	09/01/11	(\$292.87)	COMMISSION ADJ	
LT	09/01/11	\$131.41	FEE CHARGE	2011 REPORTING
LT	09/01/11	\$292.87	FEE CHARGE	2011 REPORTING
JV	09/01/11	(\$197.45)	COMMISSION ADJ	
JV	09/01/11	\$197.45	FEE CHARGE	2011 REPORTING
SV (Account 2)	09/01/11	(\$972.30)	COMMISSION ADJ	
SV (Account 2)	09/01/11	\$972.30	FEE CHARGE	2011 REPORTING
LW	09/01/11	(\$1,172.89)	COMMISSION ADJ	
LW	09/01/11	\$1,172.89	FEE CHARGE	2011 REPORTING
JY	09/01/11	(\$292.30)	COMMISSION ADJ	
JY	09/01/11	\$292.30	FEE CHARGE	2011 REPORTING
JBa	09/02/11	\$79.20	FEE CHARGE	2011 REPORTING
DC	09/02/11	(\$345.67)	COMMISSION ADJ	
DC	09/02/11	(\$398.43)	COMMISSION ADJ	
DC	09/02/11	(\$499.56)	COMMISSION ADJ	
DC	09/02/11	\$499.56	FEE CHARGE	2011 REPORTING
DC	09/02/11	\$774.10	FEE CHARGE	2011 REPORTING
JH	09/02/11	(\$79.20)	COMMISSION ADJ	
JH	09/02/11	\$79.20	FEE CHARGE	2011 REPORTING

Appendix A

ACCOUNT	DATE	AMOUNT	DESCRIPTION	
KH	09/02/11	(\$179.20)	COMMISSION ADJ	
KH	09/02/11	\$179.20	FEE CHARGE	2011 REPORTING
GJ (Account 2)	09/02/11	(\$126.45)	COMMISSION ADJ	
GJ (Account 2)	09/02/11	\$126.45	FEE CHARGE	2011 REPORTING
DK (Account 1)	09/02/11	(\$239.60)	COMMISSION ADJ	
DK (Account 1)	09/02/11	(\$532.12)	COMMISSION ADJ	
DK (Account 1)	09/02/11	\$239.60	FEE CHARGE	2011 REPORTING
DK (Account 1)	09/02/11	\$532.12	FEE CHARGE	2011 REPORTING
EL & GL	09/02/11	(\$365.97)	COMMISSION ADJ	
EL & GL	09/02/11	(\$582.67)	COMMISSION ADJ	
EL & GL	09/02/11	\$365.97	FEE CHARGE	2011 REPORTING
EL & GL	09/02/11	\$582.67	FEE CHARGE	2011 REPORTING
GL	09/02/11	(\$535.45)	COMMISSION ADJ	
GL	09/02/11	\$535.45	FEE CHARGE	2011 REPORTING
LN	09/02/11	(\$179.20)	COMMISSION ADJ	
LN	09/02/11	\$79.20	FEE CHARGE	2011 REPORTING
LN	09/02/11	\$179.20	FEE CHARGE	2011 REPORTING
JN (Account 2)	09/02/11	(\$239.60)	COMMISSION ADJ	
JN (Account 2)	09/02/11	\$239.60	FEE CHARGE	2011 REPORTING
SN (Account 2)	09/02/11	(\$79.20)	COMMISSION ADJ	
SN (Account 2)	09/02/11	\$79.20	FEE CHARGE	2011 REPORTING
MR (Account 2)	09/02/11	(\$279.30)	COMMISSION ADJ	
MR (Account 2)	09/02/11	(\$439.67)	COMMISSION ADJ	
MR (Account 2)	09/02/11	\$279.30	FEE CHARGE	2011 REPORTING
MR (Account 2)	09/02/11	\$439.67	FEE CHARGE	2011 REPORTING
RS	09/02/11	(\$694.23)	COMMISSION ADJ	
RS	09/02/11	\$694.23	FEE CHARGE	2011 REPORTING
GS	09/02/11	(\$387.54)	COMMISSION ADJ	
GS	09/02/11	(\$404.78)	COMMISSION ADJ	
GS	09/02/11	\$387.54	FEE CHARGE	2011 REPORTING
GS	09/02/11	\$404.78	FEE CHARGE	2011 REPORTING
JV	09/02/11	\$79.20	FEE CHARGE	2011 REPORTING
JY	09/02/11	(\$79.20)	COMMISSION ADJ	
JY	09/02/11	\$79.20	FEE CHARGE	2011 REPORTING
JBa	09/06/11	(\$79.20)	COMMISSION ADJ	
LN	09/06/11	(\$79.20)	COMMISSION ADJ	
JV	09/06/11	(\$79.20)	COMMISSION ADJ	
JBa	09/09/11	\$112.80	FEE CHARGE	2011 REPORTING
GJ (Account 2)	09/09/11	\$128.18	FEE CHARGE	2011 REPORTING
DK (Account 1)	09/09/11	\$190.38	FEE CHARGE	2011 REPORTING
DL (Account 1)	09/09/11	\$79.00	FEE CHARGE	2011 REPORTING
DL (Account 3)	09/09/11	\$550.00	FEE CHARGE	2011 REPORTING
EL & GL	09/09/11	\$23.73	FEE CHARGE	2011 REPORTING
LN	09/09/11	\$12.80	FEE CHARGE	2011 REPORTING
JN (Account 2)	09/09/11	\$470.80	FEE CHARGE	2011 REPORTING
MR (Account 2)	09/09/11	\$126.16	FEE CHARGE	2011 REPORTING
LW	09/09/11	\$327.11	FEE CHARGE	2011 REPORTING
JY	09/09/11	\$178.50	FEE CHARGE	2011 REPORTING
GJ (Account 2)	10/06/11	\$348.87	FEE CHARGE	2010 REPORTING
KJ (Account 2)	10/06/11	\$291.37	FEE CHARGE	2010 REPORTING
DK (Account 2)	10/06/11	\$608.35	FEE CHARGE	2010 REPORTING
JN (Account 3)	10/06/11	\$291.37	FEE CHARGE	2010 REPORTING
LW	10/06/11	\$548.72	FEE CHARGE	2010 REPORTING
EL	10/10/11	\$941.37	FEE CHARGE	2010 REPORTING
GL	10/10/11	\$548.72	FEE CHARGE	2010 REPORTING
MR (Account 2)	10/10/11	\$901.37	FEE CHARGE	2010 REPORTING
DK (Account 1)	10/12/11	\$353.89	FEE CHARGE	2010 REPORTING
JN (Account 2)	10/12/11	\$351.00	FEE CHARGE	2010 REPORTING
RS	10/12/11	\$901.45	FEE CHARGE	2010 REPORTING
JBa	10/19/11	\$47.40	FEE CHARGE	4QADV FEE
JBa	11/07/11	\$19.87	FEE CHARGE	2010 REPORTING
KD	11/07/11	\$69.87	FEE CHARGE	2010 REPORTING
CR	11/07/11	\$98.87	FEE CHARGE	2010 REPORTING
LT	11/07/11	\$299.00	FEE CHARGE	ACCOUNT CLOSING
JV	11/07/11	\$79.50	FEE CHARGE	2010 REPORTING

Appendix A

ACCOUNT	DATE	AMOUNT	DESCRIPTION	
JY	11/07/11	\$98.87	FEE CHARGE	2010 REPORTING
DK (Account 1)	11/16/11	\$701.00	FEE CHARGE	2010 REPORTING
JN (Account 2)	11/16/11	\$351.00	FEE CHARGE	2010 REPORTING
RS	11/16/11	\$796.48	FEE CHARGE	2010 REPORTING
DL (Account 3)	11/30/11	\$736.66	FEE CHARGE	4THQ ADV
TOTAL		\$90,781.06		

Appendix B

CUSTOMER	SIGNATURE DATE
KA	08/31/10
HA	06/30/10
JB	08/02/10
JBa &	09/27/10
DK	09/26/11
KB	08/31/10
LB	09/12/10
JH	09/22/10
GJ	06/30/10
KJ	06/30/10
DJ	08/02/10
PJ	08/02/10
BJ	03/22/11
EL	07/01/10
JN	08/31/10
LP	08/31/10
RS	09/14/10
RS	10/01/10
NS	09/16/10
SS &	09/20/10
MS	09/20/10
IV	08/03/10
PV	09/01/10
PV	10/22/10
DW	08/29/10
LW	09/02/10
BW	08/10/10