

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2014041218901**

TO: Department of Enforcement
Financial Industry Regulatory Authority ("FINRA")

RE: Dominick & Dominick LLC n/k/a Dominick & Dickerman LLC, Respondent
(CRD. No. 7344)

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, Dominick & Dominick LLC, now known as Dominick & Dickerman ("D & D" or the "Firm") submits this Letter of Acceptance, Waiver and Consent ("AWC") for the purpose of proposing a settlement of the alleged rule violations described below. This AWC is submitted on the condition that, if accepted, FINRA will not bring any future actions against the Firm alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. D & D hereby accepts and consents, without admitting or denying the findings, and solely for the purposes of this proceeding and any other proceeding brought by or on behalf of FINRA, or to which FINRA is a party, prior to a hearing and without an adjudication of any issue of law or fact, to the entry of the following findings by FINRA:

BACKGROUND

D & D, a New York registered broker-dealer, became a FINRA registered firm on October 17, 2002. At that time, the Firm was acting principally as a retail broker-dealer with a small investment banking division and some ancillary services. It employed approximately 75 registered representatives, most of whom were employed in its New York City office. In January, 2015, D & D sold its retail operation to Wunderlich Securities ("Wunderlich"). After the sale, D & D changed its name to Dominick and Dickerman and has continued to operate a small investment banking business that employs approximately 12 individuals.

RELEVANT DISCIPLINARY HISTORY

The Firm has no relevant disciplinary history.

OVERVIEW

From November 1, 2011 through March 20, 2014 (the “Relevant Period”), D & D solicited and accepted orders for low-priced securities¹, particularly with respect to low-priced security X (“Stock X”). Stock X is a development stage company that Firm clients and employees have invested in since 2003.

Regarding Stock X, D & D failed to establish and maintain a system to reasonably supervise and monitor customer accounts for manipulative trading activity, such as potential market manipulation, including pre-arranged or matched trading.

More generally, the Firm was also deficient in its implementation of the Firm’s supervisory system to ensure compliance with anti-money laundering (“AML”) policies and procedures reasonably designed to detect and cause the reporting of potentially suspicious transactions related to deposits and liquidations of low-priced securities. By failing reasonably to supervise and monitor customer accounts for manipulative trading, and failing to detect and investigate “red flags” indicative of potentially suspicious account activity, including transactions that could have been prearranged or matched trading and the deposit and liquidations of low-priced securities for impermissible purposes, D & D violated NASD Rule 3010(a) and FINRA Rules 3310(a), and 2010.

In addition, for equity trades, the Firm charged certain customers excessive commissions greater than 5% and/or, depending on the dollar amount of certain transactions, greater than the Firm’s \$100 minimum transaction charge in violation of NASD Rule 2440, IM-2440 and NASD Rule 3010(a) and FINRA Rule 2010.

FACTS AND VIOLATIVE CONDUCT

I. Applicable Law

NASD Rule 3010(a) requires that “[e]ach member shall establish and maintain a system to supervise the activities of each registered representative, registered principal, and other associated person that is reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable [FINRA] Rules. Final responsibility for proper supervision shall rest with the member.” A member’s supervisory system shall provide, at a minimum, for the establishment and maintenance of written procedures.

FINRA Rule 3310 requires that FINRA members develop and implement a written AML program reasonably designed to achieve and monitor compliance with the requirements of the Bank Secrecy Act, 31 U.S.C. §5311, et seq., and the

¹The United States Securities and Exchange Commission defines a low-priced security or penny stock as a security that trades below \$5-per share, is not listed on a national exchange, and is highly speculative with low liquidity and small capitalization.

regulations promulgated thereunder. FINRA Rule 3310(a) requires a member firm to establish and implement policies and procedures reasonably expected to detect and cause the reporting of suspicious transactions. Implementing regulations under the Bank Secrecy Act, 31 CFR §1023.320, specifically require a broker-dealer to report certain transactions.

In relevant part, Section (a)(2) of the Bank Secrecy Act specifically provides:

A transaction requires reporting . . . if it is conducted or attempted by, at, or through a broker-dealer, it involves or aggregates funds or other assets of at least \$5,000, and the broker-dealer knows, suspects, or has reason to suspect that the transaction (or a pattern of transactions of which the transaction is a part):

(iii) Has no business or apparent lawful purpose or is not the sort in which the particular customer would normally be expected to engage, and the broker-dealer knows of no reasonable explanation for the transaction after examining the available facts, including the background and possible purpose of the transaction;

Violations of NASD Rule 3010(a) and FINRA Rule 3310(a) are also violations of FINRA Rule 2010. An adequate supervisory system must guard against potential market manipulation, including monitoring for matched and/or pre-arranged trading and for penny stock deposits and liquidations.

In July 2002, the NASD issued guidance to the securities industry regarding broker-dealer monitoring and reporting requirements. In Notice to Members (“NTM”) 02-21, NASD emphasized that each broker-dealer has a duty to detect red flags that may indicate money laundering or other violative activity and, when it detects red flags, “to perform additional due diligence before proceeding with the transaction.” NTM 02-21 contains a non-exhaustive list of 25 AML “red flags.” In NTM 02-47 and subsequent guidance, NASD further advised broker-dealers of their duty to file a SAR for certain suspicious transactions.

II. D & D Failed to Reasonably Implement its Supervisory and AML Procedures

1. Failure to Supervise Adequately Potential Market Manipulation, Including Prearranged or Matched Trades

During the Relevant Period, the Firm’s Written Supervisory Procedures (“WSPs”) identified “market manipulation” as a prohibited activity. Among other references to prohibited transactions and activities, the Firm’s WSPs also provide that “[n]o purchase or sales orders shall be entered that is designed to raise or lower the price of a security or to give the appearance of trading for purposes of inducing others to buy and sell.”

During the Relevant Period, the Firm effected 1,218 individual trades in Stock X (1,051 solicited trades) in 148 customer accounts, resulting in total purchase and sale activity of \$3,337,059, and generating commissions of \$89,000. Two Firm registered representatives accounted for over 90% of the Stock X transactions (in excess of 1,100 trades combined).

On 219 trading days during the Relevant Period, the Firm effected what appeared to be 67 matched trades in Stock X. Many of the Stock X trades typically consisted of one registered representative's selling a position while the customers of another Firm registered representative bought that same position at the same time, volume and price. Furthermore, those two representatives traded shares of Stock X from personal accounts.

The following limit trade orders in Stock X directed to market makers on March 2, 2012 and March 5, 2012, are two examples of the 67 apparent matched trades:

March 2, 2012

Shares	Time	Customer	Shares	Price	Customer	RR
500						
	3:54:48 PM	FIRM CUSTOMER A	500	\$1.50		FIRM RR 1
	3:54:48 PM		500	\$1.50	FIRM CUSTOMER B	FIRM RR 2

March 5, 2012

Shares	Time	Customer	Shares	Price	Customer	RR
500						
	2:03:37 PM	FIRM CUSTOMER A	469	\$1.50		Firm RR 2
	2:03:37 PM		469	\$1.50	FIRM CUSTOMER C	FIRM RR 1

The trades highlighted above were indicative of potential market manipulation. However, the Firm lacked certain systems or surveillance reports to monitor for this specific type of trading activity in customer accounts. In addition, Firm supervisors did not perform a tailored review of trading in customer accounts for this particular type of market manipulation, including potential matched or pre-arranged trading.

Based on the foregoing, the Firm violated NASD Rule 3010(a) and FINRA Rule 2010 by failing to establish and maintain adequate systems to surveil for market

manipulation, matched or pre-arranged trading.

2. Failure to Monitor for, Detect, and where Appropriate, Report Suspicious Activity

During the Relevant Period, the Firm's written AML compliance program ("AMLCP") specified certain red flag "risk indicators" indicative of potential money laundering, requiring the Firm's subsequent analysis. Those red flags included, but are not limited to:

- *"The customer, for no apparent reason or in conjunction with other "red flags," engages in transactions involving certain types of securities, such as penny stocks, Regulation "S" (Reg S) stocks, and bearer bonds, which although legitimate, have been used in connection with fraudulent schemes and money laundering activity. (Such transactions may warrant further due diligence to ensure the legitimacy of the customer's activity.)"*

Based on the red flags, the AMLCP required that the Firm, daily and on an ongoing basis, review reports of cash and securities transactions, report suspicious activity, and notify registered representatives and supervisors of suspicious activity and close accounts when necessary.

During the Relevant Period, the Firm failed to reasonably implement these procedures. The Firm did not have a mechanism to review for these particular red flags systematically. The Firm's systems lacked mechanisms or processes to detect specific and identifiable trends in potential suspicious trading, such as whether Firm customers were trading with each other in the same security at the same execution time on the same day. Further, the Firm lacked a system to cross-reference and identify the individual codes for Firm registered representatives who had entered customer orders in the same security on opposite sides of the market on the same day. In addition, Firm supervisors did not review the trading in customer accounts for certain types of market manipulation or potential matched or pre-arranged trading.

Based on the foregoing, the Firm violated FINRA Rules 3310(a) and 2010 by failing to have an AML program reasonably designed to detect and report, where appropriate, potentially suspicious trading.

2. Monitoring for and Detecting Liquidation of Low-Priced Securities

During the Relevant Period, the Firm's AMLCP required that it monitor for red flags of suspicious activity involving low-priced securities, including but not limited to:

- *The customer engages in suspicious activity involving the practice of depositing penny stocks, liquidates them, and wires proceeds. A request to liquidate shares may also represent engaging in an unregistered distribution of penny stocks which may also be a red flag (FINRA Regulatory Notice 09-05).*

The Firm did not adequately surveil for this red flag or other indicia of fraud involving low-priced securities. The Firm did not maintain electronic wire transfer and stock deposit (and funds received) blotters but instead relied on a daily hardcopy log to record information and affix any supporting documentation to that day's log (e.g. physical stock certificates). During the Relevant Period, the Firm processed and reviewed approximately 13,000 wire transfers and 360 stock deposits yet failed to conduct any historical or account trends analysis. The Firm's manual method of reviewing wire transfer stock deposit activity was inadequate to detect and report, if necessary.

Several Firm customers made multiple deposits of low-priced securities, liquidated the shares shortly thereafter, and wired the proceeds out of the Firm. The Firm failed to investigate adequately how the customers acquired the shares. Further, the Firm failed to identify the suspicious deposit and liquidation of shares in low-priced securities followed by wiring of funds from the accounts and also failed to perform further reviews to determine whether to report the activity through a suspicious activity report.

Based on the foregoing, the Firm failed to develop and implement its AML program reasonably designed to achieve and monitor compliance with the requirements of the Bank Secrecy Act. As a result, the Firm violated FINRA Rules 3310(a) and 2010.

III. Excessive Commissions

NASD Rule 2440, Interpretive Material (IM) 2440-1 and IM-2440-2 prohibit member firms from charging customers prices that are not reasonably related to the current market price of the security.² NASD Rule 2440 requires that member firms sell securities to their customers "at a price which is fair, taking into consideration all relevant circumstances, including: (i) market conditions with respect to the subject security at the time of the transaction; (ii) the expense involved; and (iii) the fact that the broker is entitled to a profit." In IM-2440,

²NASD Rule 2440, IM-2440-1, and IM-2440-2 apply to the Relevant Period in this matter because FINRA Rule 2121 did not supersede the NASD Rule and the IMs until May 8, 2014. The text of FINRA Rule 2121 mirrors that of former NASD Rule 2440 and the text of IM 2440-1 and IM 2440-2 are now supplementary material for FINRA Rule 2121.

NASD's Board of Governors stated that in most equity transactions, markups and markdowns should not exceed five percent of the current market price. The member firm has the burden of justifying markups in excess of 5%.

Moreover, NASD Rule 3010(a) requires that the Firm "establish and maintain a system to supervise activities of each registered representative" and review trading activity that is "reasonably designed to assist in detecting and preventing violations."

During the Relevant Period, the Firm's written supervisory procedures required that the Firm charge no more than a 5% commission on any transaction, or depending on the dollar amount of certain trades no more than a \$100 minimum transaction charge. In addition, the written procedures included factors, referenced in IM-2440-1, that when determining the fairness of charges, the Firm should consider factors, including among other things, the type of security, the price of security, and the amount of money involved in the transaction.

The Firm, however, failed to implement an adequate system to ensure that all trades were reviewed against the 5% guideline in accordance with IM-2440-1 and/or the \$100 minimum transaction charge provided for in the Firm's written supervisory procedures. Although the Firm performed daily, manual review of all trading activity, the Firm did not generate and review electronic exception reports specifically designed to detect red flag indicators, including trades that were charged commissions in excess of the above thresholds.

Of the 236 unique customer accounts, the Firm charged 143 customer accounts in excess of the 5% guideline and 61 customer accounts greater than the \$100 minimum transaction charge. For 32 customer accounts, the Firm charged some trades greater than the 5% guideline and for other trades greater than \$100 minimum transaction charge.

The discrete excessive commissions charged to the 236 unique customer accounts ranged from \$5.00 (for a single trade in one customer account) to \$1,943 (for a total of 24 trades in one customer account). For customer accounts charged in excess of the 5% guideline, the over-charges ranged from 0.08% to 70.2% above the guideline. For customer accounts charged greater than the \$100 minimum transaction charge, in instances where 5% of the principal amount fell below \$100, the over-charges ranged from \$0.46 to \$195, and in the aggregate totaled \$4,882.

As a result, the Firm charged net excessive commissions totaling \$17,425 relating to 236 unique customer accounts and 420 equity trades. Accordingly, based on the foregoing, the Firm violated NASD Rules 2440, IM-2440-1 and IM-2440-2 and NASD Rule 3010(a) and FINRA Rule 2010.

B. D & D consents to the imposition of the following sanctions:

- A censure;
- \$20,000 fine (reduced pursuant to NTM 06-55)³; and
- Payment of restitution of \$17,425 to customers who were charged excessive commissions for certain equity trades.

The sanctions imposed herein shall be effective on a date set by FINRA staff.

D & D agrees to pay the monetary sanctions upon notice that this AWC has been accepted and that such payments are due and payable. D & D has submitted an Election of Payment form showing the method by which the Firm proposes to pay the fine imposed.

D & D specifically and voluntarily waives any right to claim that it is unable to pay, now or at any time hereafter, the monetary sanctions imposed in this matter.

Restitution is ordered to be paid to the customers listed on Attachment A hereto in the total amount of \$17,425. FINRA staff considered D & D's administrative burden and cost in calculating the small amount of interest due on the restitution to be paid to customers, therefore, D & D will not be required to pay interest on those remediations.

A registered principal on behalf of Respondent firm shall submit satisfactory proof of payment of restitution or of reasonable and documented efforts undertaken to effect restitution. Such proof shall be submitted to FINRA Senior Trial Counsel, Myles L. Orosco, at FINRA – Department of Enforcement, Brookfield Place, 200 Liberty Street, New York, NY 10281-1003 either by letter that identifies Dominick & Dominick LLC n/k/a Dominick & Dickerman LLC, Matter No. 2014041218901 or by e-mail from a work-related account of the registered principal of Respondent firm to EnforcementNotice@FINRA.org. This proof shall be provided to the FINRA staff member listed above no later than 120 days after acceptance of the AWC.

If for any reason Respondent cannot locate any customer identified in Attachment A after reasonable and documented efforts within 15 days from the date each payment is due under the installment plan, or such additional period agreed to by a FINRA staff member in writing, Respondent shall forward any undistributed restitution and interest to the appropriate escheat, unclaimed property or abandoned property fund for the state in which the customer is last known to have resided. Respondent shall provide satisfactory proof of such action to the FINRA

³Pursuant to the General Principles Applicable to all Sanction Determinations contained in the Sanction Guidelines, FINRA imposed a lower fine in this case after is considered, among other things, the Firm's revenues and financial resources. See Notice to Members 06-55.

staff member identified above and in the manner described above, within 14 days of forwarding the undistributed restitution and interest to the appropriate state authority.

Respondent has specifically and voluntarily waived any right to claim an inability to pay at any time hereafter the monetary sanction(s) imposed in this matter.

The imposition of a restitution order or any other monetary sanction herein, and the timing of such ordered payments, does not preclude customers from pursuing their own actions to obtain restitution or other remedies.

II.

WAIVER OF PROCEDURAL RIGHTS

I specifically and voluntarily waive the following rights granted under FINRA's Code of Procedure:

- A. To have a Complaint issued specifying the allegations against me;**
- B. To be notified of the Complaint and have the opportunity to answer the allegations in writing;**
- C. To defend against the allegations in a disciplinary hearing before a hearing panel, to have a written record of the hearing made and to have a written decision issued; and**
- D. To appeal any such decision to the National Adjudicatory Council ("NAC") and then to the U.S. Securities and Exchange Commission and a U.S. Court of Appeals.**

Further, I specifically and voluntarily waive any right to claim bias or prejudgment of the Chief Legal Officer, the NAC, or any member of the NAC, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including acceptance or rejection of this AWC.

I further specifically and voluntarily waive any right to claim that a person violated the ex parte prohibitions of FINRA Rule 9143 or the separation of functions prohibitions of FINRA Rule 9144, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including its acceptance or rejection.

III.

OTHER MATTERS

I understand that:

- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs ("ODA"), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against me; and
- C. If accepted:
 - 1. this AWC will become part of my permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against me;
 - 2. this AWC will be made available through FINRA's public disclosure program in accordance with FINRA Rule 8313;
 - 3. FINRA may make a public announcement concerning this agreement and the subject matter thereof in accordance with FINRA Rule 8313; and
 - 4. I may not take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or indirectly, any finding in this AWC or create the impression that the AWC is without factual basis. I may not take any position in any proceeding brought by or on behalf of FINRA, or to which FINRA is a party, that is inconsistent with any part of this AWC. Nothing in this provision affects my: (i) testimonial obligations; or (ii) right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.
- D. D & D may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. I understand that I may not deny the charges or make any statement that is inconsistent with the AWC in this Statement. This Statement does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA or its staff.

The undersigned, on behalf of the Firm, certifies that a person duly authorized to act on its behalf has read and understood all of the provisions of this AWC and has been given a full opportunity to ask questions about it; that I have agreed to its provisions voluntarily; and that no offer, threat, inducement, or promise of any kind, other than the terms set forth herein and the prospect of avoiding the issuance of a Complaint, has been made to induce the Firm to submit it.

03/30/2017
Date (mm/dd/yyyy)

Dominick & Dominick LLC n/k/a Dominick &
Dickerman LLC, Respondent

By: [Signature]
Corporate Officer

Reviewed by:

[Signature]

Brian F. Amery, Esq.
Counsel for Respondent
Bressler, Amery & Ross, PC
17 State Street
New York, NY 10004
212-425-9300

Accepted by FINRA:

4/7/2017
Date

Signed on behalf of the
Director of ODA, by delegated authority

[Signature]
Susan Light
Senior Vice President and Chief Counsel
FINRA Department of Enforcement
Brookfield Place, 200 Liberty Street
New York, New York 10281-1003
Phone Number: 646-315-7333
Fax Number: 202-689-3411

ATTACHMENT A
CUSTOMERS TO RECEIVE RESTITUTION

1. JH
2. AC - SEP IRA
3. MOC
4. MC - IRA
5. VB
6. CIG - Living TR, CGM
7. EM Trust – FBO MR
8. MHR Trust - SMR, JOR, JMR, MRM - TTEES FBO SMR
9. MHR TR, JMR & NG & SMR TTEES
10. MPC
11. EMR TR JMR & NLG & SMR TTEES
12. MHR TR, JR & NG & SR & DG & RG TTEES
13. EMR Trust; JMR & NLG & SMR TTEES
14. C & Co – FBO AT - IRA
15. IRA - FBO SL
16. RS
17. IRA - FBO AS
18. MMI
19. Trust - U/W IRA – I, CI & RI & MI TTEES
20. RAI
21. IRA - FBO RAI
22. IRA FBO B/O CM
23. SEP FBO – JRP
24. FLG
25. NMM
26. MJE
27. SMVDV
28. GBW
29. BJR TR, MRC TTE, LK TTEE, WR TTE
30. LKW
31. K 501 (c) (3) TR, CK TTEE
32. ALR, PSP
33. CAR
34. EPR
35. JBR
36. RCG
37. DW
38. IRA - FBO – RHG
39. KAA, LAMA – JT TEN

40. PH, DH - JT TEN
41. TER
42. NLG
43. CEC - TR, GC TTEE
44. JOT
45. GHL
46. JH - IRA
47. RW
48. NS
49. MPS
50. IRA FBO - AM
51. YSY & KSY - JT TEN
52. IRA FBO - LIL
53. RW
54. IRA - FBO - SK
55. RS, LS
56. MB - IRA
57. HU
58. IRA - FBO - MEJ
59. MEJ
60. Business Customer 1
61. IRA - FBO - PW
62. CEL & DLL - JT TEN
63. RCH
64. VB
65. IRA - FBO - MBR
66. HR - Liv TR, HCR TTEE
67. DH-G
68. JG & DW - JT TEN
69. MMRC
70. PR & NR - JT TEN
71. Business Customer 2
72. FT
73. SR - IRA
74. AB
75. BB & EB - JT TEN
76. MR - SEP IRA
77. Broker Dealer A - F/A/O CM
78. YBAI
79. GS - IRA
80. SAR
81. LP - IRA
82. MR - ROTH IRA
83. PMO - SIM IRA

84. KD – FBO DD UTMA
85. KD - FBO KD UTMA
86. KD - FBO AD
87. VBB - IRA CFB
88. GJF
89. JAP
90. IRA - FBO – MS
91. IRA - FBO – JRF
92. IRA - FBO – BFB
93. Business Customer 3 C/O D
94. LR
95. AGPW – 401K & PSP FBO DL-J
96. AGPW - 401K & PSP FBO SB
97. AGPW - 401K & PSP FBO MR
98. SKS
99. AGPW - 401K & PSP FBO GW
100. MW - FBO PW
101. DRF
102. FS
103. JG, AN - JT TEN
104. IRA - FBO - MB B/O ZM
105. IRA - FBO – NS
106. IRA - FBO – RCS
107. IRA - FBO – SKS
108. IRA - FBO – GRA
109. FCS
110. GAD Trust UAD, ZGD & DD TTEE
111. IRA - FBO - RB
112. JS
113. JSC, KLC - JT TEN
114. LF, LF - JT TEN
115. LBS, MTV UGMA
116. LBS
117. IM
118. AM & IM - JT TEN
119. JR IRA
120. RD, JGD - JT TEN
121. DSR
122. TR
123. PB – IRA
124. SW, JW & MW – JT TEN
125. IRA - FBO – JK
126. SAH C/F JWH UGMA
127. PB – IRA

128. IRA - FBO – HMG
 129. IRA - FBO – LGI – ROTH Account
 130. IRA - FBO – LGI
 131. IRA - FBO – SF, ROTH Conversion
 132. WTY, KJY - JT TEN
 133. Business Customer 4
 134. IRA FBO WTY
 135. RD
 136. RB – IRA
 137. DCL - IRA
 138. SEP FBO - AT
 139. MAG
 140. IEM
 141. GNP
 142. JLM – IRA
 143. MW & IW - JT TEN
 144. EPC, KGC, Executor
 145. GMTB – IRA MT
 146. PLA, IKA – JT TEN C/O DR
 147. JG – IRA
 148. HS – SEP IRA
 149. VCM – SEP IRA
 150. HK Revocable Trust, HK TTEE
 151. Customer 1
 152. NSM – IRA MR TR, JMR & MBR & JMR & DBR TTEES
 153. Customer 2
 154. MR TR, JMR & MBR & JMR & DB TTEES
 155. ET, MT, Executor
 156. EMR TR, JMR & NBR & JMR & DBR TTEES
 157. GA, EA – JT TEM
 158. Broker Dealer B – FAO Business Customer 5
 159. Broker Dealer C F/B/O Business Customer 6
 160. JS
 161. IRA - FBO – EG ROTH Account
 162. MJ-G Revocable Trust UAD MJ-G TTE
 163. DA C/F CLBA UTMA
 164. DRF - FBO RHF UTMA
 165. RAI, JZ TEN COM
 166. Broker Dealer D FAO DM
 167. AT & PT, AT & PT TTEES
 168. KK GIFT TR, SK TTEE & KK TTEE
 169. IRA - FBO – DR B/O RR
 170. TIS
 171. IRA - FBO – ALI ROTH Account

172.	IRA – FBO RIJ
173.	BW, MW - JT TEN
174.	ACS & RFS - JT WROS
175.	EB – IRA
176.	IRS FBO – RC
177.	MDG – IRA
178.	IRA - FBO – FR BO RR
179.	IRA - FBO – DVM
180.	MNK
181.	MMJ - FBO SEM UTMA
182.	AS
183.	JOS
184.	CS
185.	Business Customer 7 TR, ADP
186.	PVB & FVB - JTWROS
187.	LL, BB - JT TEN
188.	JC & SPC - JT TEN
189.	MAS – SEP IRA
190.	SJ – IRA - RI
191.	CS, LB Executor C/O BLKGG
192.	FR for JAR UGMA
193.	LV
194.	FR
195.	Business Customer 8 C/O RAW
196.	Business Customer 7 TR FBO RG - IRA
197.	CER-A, AMRG – JT TEN
198.	NJ, LAJ & REJ – JT TEN
199.	NJ, LAJ & REJ – JT TEN
200.	MBE
201.	EDB Trust, EDB TTEE UAD
202.	EJH-L
203.	FP
204.	VA & NA JTWROS CGRE
205.	Business Customer 10 C/O VV
206.	NJ
207.	IRA - FBO – EK
208.	JG – IRA
209.	AM
210.	DBG – IRA
211.	JC C/F EC
212.	AA, RA - JT TEN
213.	JM
214.	Business Customer 11 C/O JATM
215.	MEE – IRA

216.	RE – IRA
217.	JPB TR JPB – TTEE U/A
218.	Business Customer 12
219.	JAG
220.	Business Customer 13
221.	SA & LH – JT TEN
222.	JLF & JMF – JT TEN
223.	AN
224.	CCAR, CERA – JT TEN
225.	DG
226.	NDS
227.	JC C/F EC
228.	JRO, LEB – JT TEN
229.	IRA FBO – JAL
230.	CL
231.	JALI
232.	GP
233.	VCM, MDM – JT TEN
234.	RP, CP – JT TEN
235.	Business Customer 14
236.	MB