FINANCIAL INDUSTRY REGULATORY AUTHORITY
OFFICE OF HEARING OFFICERS

DEPARTMENT OF ENFORCEMENT, COMPLAINANT, v. **DENNIS A. MEHRINGER, JR.** (CRD No. 722569), RESPONDENT.	DISCIPLINARY PROCEEDING No. 2014041868001 HEARING OFFICER --

COMPLAINT

The Department of Enforcement alleges:

SUMMARY

1. From July 2010 to August 2013, Respondent Dennis A. Mehringer, Jr. made unsuitable recommendations that caused a customer to engage in excessively expensive short-term trading and intra-day switching of mutual fund Class A shares, thereby violating NASD Rule 2310 (for conduct prior to July 9, 2012) and FINRA Rules 2111 (for conduct on or after July 9, 2012) and 2010. In addition, Mehringer violated NASD Rule 2510 and FINRA Rule 2010 by exercising discretion in the same customer's accounts without obtaining the customer's written authorization and the firm's approval to do so.

2. From March 2013 to at least May 2015, Mehringer also failed to fulfill his fiduciary obligations to a charitable trust he had helped create when, as trustee, he violated the purported charitable purposes of the trust; endangered the favorable tax treatment for donations to the trust; temporarily held trust assets in his own name; and made a risky investment of trust assets without conducting due diligence or taking reasonable steps to protect those assets. He also

provided false information to his firm when questioned about the use of assets from the trust. By virtue of this conduct, Mehringer violated FINRA Rule 2010.

3. In addition, Mehringer settled a customer complaint in May 2014 without providing notice to his firm, and later submitted false responses about the complaint and settlement in a compliance questionnaire from his firm, which also violated FINRA Rule 2010.

RESPONDENT AND JURISDICTION

4. Mehringer has been in the securities industry since 1981. He has been registered with thirteen FINRA member firms, and has been registered with Western International Securities, Inc. since 2009.

FIRST CAUSE OF ACTION

Unsuitable Short-Term Trading and Intra-day Switching of Mutual Funds

(NASD Rule 2310 and FINRA Rules 2111 and 2010)

5. The Department realleges and incorporates by reference paragraphs 1–4 above.

6. Between July 2010 and July 2011, customer ES opened a total of six brokerage accounts with Mehringer at Western International. These included personal, retirement, joint, and business accounts.[1]

7. The investment objective for each of the six accounts was "growth." None of them had "trading" or "speculation" as a stated objective.

8. Mehringer solicited all or almost all of the transactions in ES's accounts.

9. Mutual funds with front-end loads are unsuitable as short-term investments. Short-term trading of mutual fund shares, such as purchases made with the intention to sell within one year, are generally unsuitable due to the high cost of those securities.

[1] Enforcement will identify any customers by name in a separate filing.

10. Mehringer repeatedly recommended, and caused ES to engage in, short-term purchases and sales of 84 mutual fund Class A positions (involving the sale of shares within a year of purchasing them) in five of ES's accounts between July 2010 and August 2013. The specific trades are identified in Attachment A.

11. In 47 of the 84 purchase transactions described in the preceding paragraph, ES paid front-end sales loads ranging from four to five percent.

12. All but 17 of these 84 mutual fund positions were held for less than six months, and approximately 35 of them were held for less than three months. Five were held for less than one week.

13. Mehringer received $169,735 in commissions from the 84 transactions set forth in Attachment A.

14. NASD Rule 2310, which was in effect until July 9, 2012, required that, in recommending the purchase, sale, or exchange of a security, a member have reasonable grounds for believing that the recommendation is suitable for the customer based on the facts, if any, disclosed by such customer as to his other security holdings and his financial situation and needs.

15. FINRA Rule 2111, which became effective on July 9, 2012, requires that a member or associated person have a reasonable basis to believe that a recommended securities transaction or investment strategy is suitable for the customer, based on the information obtained through the reasonable diligence of the member or associated person to ascertain the customer's investment profile.

16. One requirement of the suitability obligation, as set forth in Supplementary Material .05 to FINRA Rule 2111, is that an associated person must have a reasonable basis to believe, based on reasonable diligence, that the recommendation is suitable for at least *some* investors.

17. Another requirement of the suitability obligation, as set forth in Supplementary Material .05 to FINRA Rule 2111, is that an associated person who has actual or *de facto* control over a customer account must have a reasonable basis for believing that a series of recommended transactions, even if suitable when viewed in isolation, are not excessive and unsuitable for the customer when taken together in light of the customer's investment profile.

18. Mehringer recommended the short-term mutual fund trading and the intra-day mutual fund switching alleged above without reasonable grounds to believe that the recommendations were suitable for ES in light of the frequency and nature of the transactions, including the associated sales loads, based on ES's investment objectives.

19. Given the long-term nature of Class A mutual fund share investments, along with the sales loads incurred in connection with frequent trading and switching between the relevant mutual funds and mutual fund families, Mehringer's short-term trading and switching was also unsuitable for any customer.

20. By virtue of the foregoing, Mehringer violated NASD Rule 2310 (for conduct prior to July 9, 2012) and FINRA Rule 2111 (for conduct on or after July 9, 2012).

21. By violating NASD Rule 2310 and FINRA Rule 2111, Mehringer also violated FINRA Rule 2010.

SECOND CAUSE OF ACTION

Unauthorized Exercise of Discretionary Authority

(NASD Rule 2510 and FINRA Rule 2010)

22. The Department realleges and incorporates by reference paragraphs 1–21 above.

23. Mehringer did not contact ES prior to every trade he made in ES's accounts.

24. Mehringer did not have discretionary authority over any of ES's accounts .

25. NASD Rule 2510(b) provides that registered persons may not exercise discretionary power in a customer's account unless the customer has given prior written authorization and the account has been accepted by the firm in writing as a discretionary account. Mehringer failed to comply with either of these conditions, and thereby violated NASD Rule 2510(b).

26. By violating NASD Rule 2510, Mehringer also violated FINRA Rule 2010.

THIRD CAUSE OF ACTION

Breach of Fiduciary Obligations as Trustee

(FINRA Rule 2010)

27. The Department realleges and incorporates by reference paragraphs 1–26 above.

Establishment of the Mehringer Education Trust

28. In or about March 2013, Mehringer and his customer, JB, established what was the Mehringer Education Trust (the Trust) for the putative purpose of funding scholarships and educational expenses for underprivileged children at private schools in the Pasadena, California area and to provide contributors with an opportunity to make tax-deductible charitable donations.

29. Mehringer created the Trust by creating a Trust Agreement using a form he downloaded from the Internet. This was a generic trust document, and did not relate or refer in any way to charitable purposes other than titling the document "Charitable Trust Known as Mehringer Education Trust." It established no criteria delineating who was eligible to receive scholarships funded by the Trust and had no provisions restricting the use of Trust assets to educational or charitable purposes or stating any charitable purposes for the Trust.

30. Mehringer designated himself as the settlor of the Trust and designated himself and JB as the trustees.

31. Under the terms of the Trust Agreement, Mehringer had the right to receive the income generated by the Trust and to withdraw the principal of the Trust.

32. Mehringer opened an account for the Trust at his firm, Western International, with himself as the registered representative for the account. The Trust was designated as a non-profit organization on the new account documentation generated by Mehringer.

33. An associate of JB initially funded the Trust by donating more than $1 million in March 2013. Another associate of JB donated a total of more than $350,000 in October and November 2014. These funds were all deposited into the Trust's Western International account.

34. On July 22, 2015, over two years after the Trust had been founded and engaged in various investments, disbursements, and other activities, Mehringer and JB executed an amendment to the Trust Agreement (dated as of March 25, 2015) that for the first time documented the purported charitable purpose of the Trust.

35. Mehringer breached his fiduciary obligation to the Trust by establishing it in such a manner as to give himself potential ownership of the Trust's assets and by failing to ensure that it would fulfill its purported charitable purposes.

Mehringer's Mismanagement of the Trust and Improper Use of Trust Assets

Payment of Tuition for JB's Children from Trust Assets

36. Between March 2013 and February 2015, Mehringer wrote six checks totaling $154,310 to a private school in the Pasadena area from the Trust account at Western International.

37. All or nearly all of the Trust's disbursements for educational purposes were used to pay tuition expenses for the children of Mehringer's affluent co-trustee, JB. The Trust made no disbursements for scholarships or any other support for underprivileged students.

38. Specifically, on June 10, 2013, Mehringer wrote a check for $3,750 from the Trust's account to the school to pay the summer school tuition for JB's six children.

39. On July 11, 2013, JB's wife forwarded Mehringer an email from the private school regarding the $69,310 tuition due for their children with a cover message saying "[w]e need to have a check sent to the kids' school for tuition in the Amt below."

40. That same day, Mehringer wrote a $69,310 check from the Trust's account to the same private school to pay the tuition for JB's children.

41. Approximately one year later, on July 10, 2014, Mehringer wrote a check from the Trust's account for $69,500 to the same private school.

42. Mehringer did not obtain any receipts evidencing donations to the private school or any other documentation indicating that any of the payments to the private school were donations.

43. Mehringer violated his fiduciary obligations by using the Trust funds for non-charitable purposes, thereby violating the intent of the Trust and endangering the tax exempt status of the Trust and of donations to the Trust.

Purchase of Property in Alaska with Trust Assets and Personal Funds, and Commingling of Funds

44. On June 19, 2013, Mehringer wired $123,880 from the Trust's account at Western International Securities to a title company in Alaska with the notation "FBO Dennis Mehringer." On the same day, he sent the same amount from his personal 401(k) account to the same title company.

45. On June 19, 2013, Mehringer used the funds described in the previous paragraph to purchase a condominium in Anchorage as a short-term investment. The condominium was purchased solely in Mehringer's name.

46. The purchase price for the condominium was $255,000.

47. Mehringer did not create any documentation evidencing any interest in the condominium on the part of the Trust.

48. On August 26, 2013, Mehringer sold the condominium for $287,500, and received net proceeds of $268,089.

49. On August 27, 2013, Mehringer wrote two personal checks to the Trust, one for the $123,880 amount originally taken from the Trust for the purchase, and one for $10,164.56, representing one-half of the profits from the transaction.

50. Mehringer breached his fiduciary obligation to the Trust by commingling his personal assets with those of the Trust, and by holding title to the property in his own name.

Nursing Home Transaction

51. Mehringer used more than $128,000 of the Trust's assets to make an ill-fated investment involving a nursing home owned by one of his customers without conducting adequate due diligence into the investment and without putting the invested funds into escrow.

52. On October 3, 2014, Mehringer wrote two checks payable to one of his customers, MM, for $63,412 and $65,000 from the Trust's account at Western International Securities.

53. MM was introduced to Mehringer by JB.

54. Mehringer intended to use the funds for the Trust's purchase of a mortgage on a nursing home owned by a partnership in which MM was a partner.

55. According to Mehringer, the funds were supposed to go into an escrow account, but Mehringer failed to ascertain there was an escrow account, and instead sent the money directly to MM.

56. MM deposited the funds into the partnership account.

57. Mehringer failed to obtain any documentation from the partnership that owned the nursing home to evidence the purpose or receipt of the payments.

58. Mehringer failed to conduct due diligence (including conducting a title search) into the nursing home, and thereby failed to discover that the partnership's assets were subject to a lien for unpaid payroll taxes.

59. The account into which the Trust's funds were deposited by MM was subject to the payroll tax lien which had been in effect and publicly disclosed prior to the time Mehringer sent the Trust's money to MM, and the funds could not be returned.

60. Mehringer breached his fiduciary obligation to the Trust and endangered its assets by making an undocumented investment, by failing to conduct due diligence, and by failing to ensure that the funds were being deposited into an escrow account.

61. By engaging in the conduct alleged in the Cause of Action, Mehringer failed to observe high standards of commercial honor and just and equitable principles of trade, thereby violating FINRA Rule 2010.

FOURTH CAUSE OF ACTION

Providing False Information to Firm Regarding Trust Proceeds

(FINRA Rule 2010)

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

63. Mehringer made multiple misrepresentations to his firm regarding the payments from the Trust alleged above to the private school attended by JB's children. On October 27, 2014 Mehringer told his firm's compliance department by email that the funds were donated to the Trust to benefit underprivileged children. On November 4, 2014, he responded to a follow-up email from compliance asking "How does the money [from the Trust] get to the underprivileged children?" by saying "The money is sent to the schools where they attend as a scholarship." In

another email, dated December 9, 2014, Mehringer represented that "Donations were made to the [private] school...."

64. In or about April 2015, Mehringer responded to an inquiry by his firm regarding activity in the Trust account. He falsely represented that the $69,310 check to the private school written on August 17, 2013, was a donation to the school. As alleged above, the payment was for tuition for the children of Mehringer's co-trustee, JB.

65. By providing false information to his firm, Mehringer failed to observe high standards of commercial honor and just and equitable principles of trade, thereby violating FINRA Rule 2010.

FIFTH CAUSE OF ACTION

Settling Customer Complaint Away From the Firm

(FINRA Rule 2010)

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

67. In or about March 2014, Mehringer's customer MN instructed Mehringer to sell a bond that MN owned in his account with Mehringer.

68. The bond was not sold until approximately one week after Mehringer was told to do so by MN, by which time the issuer had declared bankruptcy and the price of the bond had fallen drastically from the price at the time MN directed Mehringer to sell it.

69. On May 20, 2014, MN sent Mehringer an email stating, "I see the sale at our full loss, now what?"

70. Mehringer responded the same date stating, "I am overnighting you a check for the difference. The balance is classified as a 'settlement of a legal claim' and is NOT taxable income."

71. Also on that same day, Mehringer sent a personal check to MN for $47,777.98. He wrote "Settlement of Claim" on the memo line.

72. Mehringer did not disclose either the complaint or the settlement to his firm's compliance department or to his supervisor.

73. Western International's written supervisory procedures specifically provided: "Employees may not make payments to customers of any kind to resolve an error or customer complaint. Errors and complaints must be brought to the attention of the employee's designated supervisor."

74. By settling customer MN's complaint without notifying his firm, Mehringer failed to observe high standards of commercial honor and just and equitable principles of trade, and thereby violated FINRA Rule 2010.

SIXTH CAUSE OF ACTION

False Responses to Compliance Questionnaire

(FINRA Rule 2010)

75. The Department realleges and incorporates by reference paragraphs 1–74 above.

76. On or about October 28, 2014, Mehringer completed his 2014 Annual Compliance Questionnaire.

77. In response to item 3.1 under the heading "U4 Form Updates," Mehringer responded that he had promptly reported all written or oral customer complaints he had received while at the firm to the firm's compliance department.

78. This answer was false in light of Mehringer's failure to disclose the May 2014 complaint by customer MN.

79. In response to item 5 under the heading "Prohibited Practices," Mehringer answered "no" to the question "While associated with the firm, have you ever promised or actually paid money to a client in connection with a securities transaction?"

80. This answer was false in light of Mehringer's May 2014 payment to customer MN, alleged in the preceding Cause of Action.

81. By virtue of the foregoing, Mehringer violated FINRA Rule 2010.

RELIEF REQUESTED

WHEREFORE, the Department respectfully requests that the Panel:

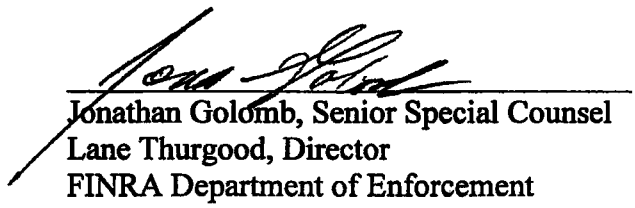
A. make findings of fact and conclusions of law that Respondent(s) committed the violations charged and alleged herein;

B. order that one or more of the sanctions provided under FINRA Rule 8310(a), including monetary sanctions, be imposed, including that Respondent be required to disgorge fully any and all ill-gotten gains, together with interest; and

C. order that Respondent(s) bear such costs of proceeding as are deemed fair and appropriate under the circumstances in accordance with FINRA Rule 8330.

FINRA DEPARTMENT OF ENFORCEMENT

Date: December 16, 2016



Jonathan Golomb, Senior Special Counsel
Lane Thurgood, Director
FINRA Department of Enforcement
15200 Omega Drive
Rockville, MD 20850
(301) 258-8532
jonathan.golomb@finra.org

No	Trade Date	Account	Security Desc	B/S	Quantity	Price	Comm/Credit	Net Amount	Load %
1	7/29/2010	xxxx1120	ALLIANCE BERNSTEIN HIGH INCOME	B	10,976.95	$ 9.11	$ 3,000.00	$ 100,000.00	0.0300
	2/4/2011	xxxx1120	ALLIANCE BERNSTEIN HIGH INCOME	S	10,976.95	$ 9.17		$ 100,628.61	
2	12/28/2011	xxxx1120	AMERICAN BEACON INTERMEDIATE BOND	B	3,493.45	$ 11.45	$ 1,600.00	$ 40,000.00	0.0400
	11/1/2012	xxxx1120	AMERICAN BEACON INTERMEDIATE BOND	S	3,493.91	$ 11.23		$ 39,206.59	
3	12/29/2010	xxxx1120	AB GLOBAL THEMATIC GROWTH	B	126.282	$ 79.98	$ 303.00	$ 10,100.00	0.0300
	6/3/2011	xxxx1120	AB GLOBAL THEMATIC GROWTH	S	6.503	$ 76.89		$ 500.00	
	9/12/2011	xxxx1120	AB GLOBAL THEMATIC GROWTH	S	119.779	$ 64.47		$ 7,692.15	
4	8/26/2013	xxxx1120	AMERICAN FUNDS AMCAP FUND	B	1,841.04	$ 27.05	$ 2,116.50	$ 49,800.00	0.0425
	10/23/2013	xxxx1120	AMERICAN FUNDS AMCAP FUND	S	1,841.04	$ 27.37		$ 50,339.13	
5	10/9/2012	xxxx1120	UBS US EQUITY OPPORTUNITY	B	6,862.75	$ 7.14	$ 2,450.00	$ 49,000.00	0.0500
	1/24/2013	xxxx1120	UBS US EQUITY OPPORTUNITY	S	6,862.75	$ 7.14		$ 48,970.00	
6	10/9/2012	xxxx1120	AB DISCOVERY GROWTH	B	6,721.54	$ 7.29	$ 1,470.00	$ 49,000.00	0.0300
	1/24/2013	xxxx1120	AB DISCOVERY GROWTH	S	6,721.54	$ 7.62		$ 51,188.10	
7	7/29/2010	xxxx1120	DELAWARE DIVERSIFIED INCOME	B	10,121.46	$ 9.88	$ 3,000.00	$ 100,000.00	0.0300
	2/4/2011	xxxx1120	DELAWARE DIVERSIFIED INCOME	S	10,121.46	$ 9.16		$ 92,682.55	
8	7/29/2010	xxxx1120	EATON VANCE EMERGING MARKETS LOCAL INC.	B	9,310.99	$ 10.74	$ 3,000.00	$ 100,000.00	0.0300
	10/6/2010	xxxx1120	EATON VANCE EMERGING MARKETS LOCAL INC.	S	9,310.99	$ 10.98		$ 102,204.64	
9	3/14/2012	xxxx1120	MAINSTAY EPOCH GLOBAL EQUITY YIELD	B	2,201.26	$ 15.90	$ 350.00	$ 35,000.00	0.0100
	8/28/2012	xxxx1120	MAINSTAY EPOCH GLOBAL EQUITY YIELD	S	2,201.26	$ 16.11		$ 35,082.27	
10	10/10/2012	xxxx1120	FIDELITY ADVISOR BIOTECHNOLOGY	B	4,281.10	$ 12.38	$ 1,987.50	$ 53,000.00	0.0375
	2/4/2013	xxxx1120	FIDELITY ADVISOR BIOTECHNOLOGY	S	4,281.10	$ 12.38		$ 52,970.01	

ATTACHMENT A

No	Trade Date	Account	Security Desc	B/S	Quantity	Price	Comm/Credit	Net Amount	Load %
11	7/29/2010	xxxx1120	FIDELITY ADVISOR FLOATING RATE HIGH INC.	B	10,288.07	$ 9.72	$ 1,500.00	$ 100,000.00	0.0150
	2/4/2011	xxxx1120	FIDELITY ADVISOR FLOATING RATE HIGH INC.	S	10,288.07	$ 9.91		$ 101,924.73	
12	10/9/2012	xxxx1120	FEDERATED KAUFMANN SMALL CAP	B	1,799.49	$ 27.23	$ 1,960.00	$ 49,000.00	0.0363
	5/28/2013	xxxx1120	FEDERATED KAUFMANN SMALL CAP	B	1,674.55	$ 28.76	$ 1,565.20	$ 48,160.00	
	7/22/2013	xxxx1120	FEDERATED KAUFMANN SMALL CAP	S	3,474.03	$ 28.26		$ 98,146.20	
13	7/29/2010	xxxx1120	FRANKLIN TOTAL RETURN	B	9,596.93	$ 10.42	$ 2,800.00	$ 100,000.00	0.0280
	2/4/2011	xxxx1120	FRANKLIN TOTAL RETURN	S	9,596.93	$ 10.02		$ 96,131.23	
14	10/9/2012	xxxx1120	FIDELITY ADVISOR LEVERAGE COMPANY STOCK	B	1,246.50	$ 39.31	$ 2,450.00	$ 49,000.00	0.0500
	1/24/2013	xxxx1120	FIDELITY ADVISOR LEVERAGE COMPANY STOCK	S	1,246.50	$ 41.90		$ 52,198.43	
15	9/25/2012	xxxx1120	INVESCO GLOBAL HEALTH CARE	B	401.386	$ 34.63	$ 695.00	$ 13,900.00	0.0344
	9/27/2012	xxxx1120	INVESCO GLOBAL HEALTH CARE	B	178.366	$ 34.76	$ 310.00	$ 6,200.00	
	10/8/2012	xxxx1120	INVESCO GLOBAL HEALTH CARE	B	806.219	$ 34.73	$ 840.00	$ 28,000.00	
	10/8/2012	xxxx1120	INVESCO GLOBAL HEALTH CARE	B	1,382.09	$ 34.73	$ 1,440.00	$ 48,000.00	
	12/6/2012	xxxx1120	INVESCO GLOBAL HEALTH CARE	B	88.895	$ 34.31	$ 122.00	$ 3,050.00	
	4/3/2013	xxxx1120	INVESCO GLOBAL HEALTH CARE	S	2,856.96	$ 35.11		$ 100,277.73	
16	7/15/2013	xxxx1120	INVESCO GLOBAL HEALTH CARE	B	1,205.12	$ 40.66	$ 2,450.00	$ 49,000.00	0.0400
	7/17/2013	xxxx1120	INVESCO GLOBAL HEALTH CARE	B	851.064	$ 39.95	$ 1,360.00	$ 34,000.00	
	7/23/2013	xxxx1120	INVESCO GLOBAL HEALTH CARE	B	1,231.78	$ 39.78	$ 1,470.00	$ 49,000.00	
	10/28/2013	xxxx1120	INVESCO GLOBAL HEALTH CARE	S	740.513	$ 40.58		$ 30,000.00	
17	7/29/2010	xxxx1120	HIGHMARK GROUP-BOND FD	B	8,795.08	$ 11.37	$ 1,580.00	$ 100,000.00	0.0158
	2/4/2011	xxxx1120	HIGHMARK GROUP-BOND FD	S	8,795.08	$ 10.97		$ 96,451.97	
18	4/19/2012	xxxx1120	TRANSAMERICA CAPITAL GROWTH	B	974.296	$ 17.39	$ 804.79	$ 16,943.00	0.0392
	4/20/2012	xxxx1120	TRANSAMERICA CAPITAL GROWTH	B	4,380.84	$ 17.12	$ 3,000.00	$ 75,000.00	
	5/10/2012	xxxx1120	TRANSAMERICA CAPITAL GROWTH	B	1,062.54	$ 16.47	$ 481.25	$ 17,500.00	
	5/21/2012	xxxx1120	TRANSAMERICA CAPITAL GROWTH	S	6,417.68	$ 15.38		$ 98,673.84	

No	Trade Date	Account	Security Desc	B/S	Quantity	Price	Comm/Credit	Net Amount	Load %
19	6/14/2012	xxxx1120	TRANSAMERICA CAPITAL GROWTH	B	842.305	$ 15.79	$ 631.75	$ 13,300.00	0.0475
	7/12/2012	xxxx1120	TRANSAMERICA CAPITAL GROWTH	B	328.49	$ 15.83	$ 247.00	$ 5,200.00	
	7/13/2012	xxxx1120	TRANSAMERICA CAPITAL GROWTH	B	937.5	$ 16.00	$ 712.50	$ 15,000.00	
	9/20/2012	xxxx1120	TRANSAMERICA CAPITAL GROWTH	S	2,108.30	$ 16.23		$ 34,187.63	
20	10/8/2012	xxxx1120	TRANSAMERICA CAPITAL GROWTH	B	2,999.40	$ 16.67	$ 2,000.00	$ 50,000.00	0.0400
	3/4/2013	xxxx1120	TRANSAMERICA CAPITAL GROWTH	S	2,999.40	$ 16.51		$ 49,490.09	
21	12/15/2011	xxxx1120	TRANSAMERICA AEGON HIGH YIELD BOND	B	716.304	$ 9.20	$ 263.60	$ 6,590.00	0.0350
	12/21/2011	xxxx1120	TRANSAMERICA AEGON HIGH YIELD BOND	B	2,833.62	$ 9.19	$ 1,041.64	$ 26,041.00	
	12/28/2011	xxxx1120	TRANSAMERICA AEGON HIGH YIELD BOND	B	7,181.72	$ 9.19	$ 2,145.00	$ 66,000.00	
	4/10/2012	xxxx1120	TRANSAMERICA AEGON HIGH YIELD BOND	S	10,731.65	$ 9.22		$ 98,915.79	
22	8/23/2012	xxxx1120	TRANSAMERICA AEGON HIGH YIELD BOND	B	634.441	$ 9.93	$ 252.00	$ 6,300.00	0.0335
	10/8/2012	xxxx1120	TRANSAMERICA AEGON HIGH YIELD BOND	B	4,295.70	$ 10.01	$ 1,397.50	$ 43,000.00	
	1/30/2013	xxxx1120	TRANSAMERICA AEGON HIGH YIELD BOND	S	4,930.15	$ 9.83		$ 48,433.33	
23	12/28/2011	xxxx1120	JP MORGAN INCOME BUILDER	B	7,104.41	$ 9.29	$ 2,673.00	$ 66,000.00	0.0405
	12/29/2011	xxxx1120	JP MORGAN INCOME BUILDER	B	2,783.73	$ 9.34	$ 1,053.00	$ 26,000.00	
	3/22/2012	xxxx1120	JP MORGAN INCOME BUILDER	B	508.647	$ 9.83	$ 202.50	$ 5,000.00	
	8/28/2012	xxxx1120	JP MORGAN INCOME BUILDER	S	10,396.79	$ 9.58		$ 99,571.21	
24	11/17/2010	xxxx1120	LORD ABBETT SHORT DURATION INCOME	B	21,353.07	$ 4.73	$ 1,515.00	$ 101,000.00	0.0150
	2/4/2011	xxxx1120	LORD ABBETT SHORT DURATION INCOME	S	21,658.23	$ 4.60		$ 99,597.85	
25	3/28/2011	xxxx1120	NATIXIS CGM ADVISOR TARGETED EQUITY	B	858.053	$ 11.61	$ 398.48	$ 9,962.00	0.0400
	6/27/2011	xxxx1120	NATIXIS CGM ADVISOR TARGETED EQUITY	S	109.922	$ 10.28		$ 1,100.00	
26	7/21/2011	xxxx1120	NATIXIS CGM ADVISOR TARGETED EQUITY	B	1,552.63	$ 11.40	$ 708.00	$ 17,700.00	0.0400
	7/25/2011	xxxx1120	NATIXIS CGM ADVISOR TARGETED EQUITY	B	1,172.50	$ 11.42	$ 535.60	$ 13,390.00	
	8/30/2011	xxxx1120	NATIXIS CGM ADVISOR TARGETED EQUITY	B	1,524.39	$ 9.84	$ 600.00	$ 15,000.00	
	9/12/2011	xxxx1120	NATIXIS CGM ADVISOR TARGETED EQUITY	S	4,997.66	$ 8.85		$ 44,199.26	

No	Trade Date	Account	Security Desc	B/S	Quantity	Price	Comm/Credit	Net Amount	Load %
27	4/3/2013	xxxx1120	PIMCO REAL ESTATE REAL RETURN STRATEGY	B	9,351.15	$ 5.24	$ 2,327.50	$ 49,000.00	0.0419
	4/4/2013	xxxx1120	PIMCO REAL ESTATE REAL RETURN STRATEGY	B	299.057	$ 5.30	$ 63.40	$ 1,585.00	
	4/25/2013	xxxx1120	PIMCO REAL ESTATE REAL RETURN STRATEGY	B	8,957.95	$ 5.47	$ 1,960.00	$ 49,000.00	
	5/14/2013	xxxx1120	PIMCO REAL ESTATE REAL RETURN STRATEGY	B	2,757.35	$ 5.44	$ 450.00	$ 15,000.00	
	8/15/2013	xxxx1120	PIMCO REAL ESTATE REAL RETURN STRATEGY	S	12,576.92	$ 3.90		$ 49,000.00	
28	7/29/2010	xxxx1120	PRINCIPAL GLOBAL DIVIDEND INCOME	B	7,651.11	$ 13.07	$ 2,250.00	$ 100,000.00	0.0225
	2/4/2011	xxxx1120	PRINCIPAL GLOBAL DIVIDEND INCOME	S	7,651.11	$ 13.47		$ 103,030.44	
29	7/29/2010	xxxx1120	PUTNAM U.S. GOVERNMENT INCOME	B	6,369.43	$ 15.70	$ 2,750.00	$ 100,000.00	0.0275
	11/16/2010	xxxx1120	PUTNAM U.S. GOVERNMENT INCOME	S	6,369.43	$ 15.03		$ 95,702.49	
30	5/29/2012	xxxx1120	PNC MULTI-FACTOR SMALL CAP VALUE	B	93.279	$ 12.35	$ 57.60	$ 1,152.00	0.0500
	9/12/2012	xxxx1120	PNC MULTI-FACTOR SMALL CAP VALUE	S	93.279	$ 12.72		$ 1,156.51	
31	9/20/2012	xxxx1120	PNC MULTI-FACTOR SMALL CAP VALUE	B	1,537.34	$ 13.66	$ 1,050.00	$ 21,000.00	0.0441
	10/8/2012	xxxx1120	PNC MULTI-FACTOR SMALL CAP VALUE	B	5,965.70	$ 13.41	$ 3,400.00	$ 80,000.00	
	10/26/2012	xxxx1120	PNC MULTI-FACTOR SMALL CAP VALUE	S	7,503.03	$ 12.51		$ 93,832.93	
32	1/30/2013	xxxx1120	PNC MULTI-FACTOR SMALL CAP VALUE	B	3,455.72	$ 13.89	$ 2,280.00	$ 48,000.00	0.0474
	3/6/2013	xxxx1120	PNC MULTI-FACTOR SMALL CAP VALUE	B	82.811	$ 14.37	$ 50.58	$ 1,190.00	
	3/11/2013	xxxx1120	PNC MULTI-FACTOR SMALL CAP VALUE	S	3,538.54	$ 13.92		$ 49,226.41	
33	7/29/2010	xxxx1120	PRINCIPAL BOND & MORTGAGE SECURITIES	B	9,469.70	$ 10.56	$ 2,250.00	$ 100,000.00	0.0225
	2/4/2011	xxxx1120	PRINCIPAL BOND & MORTGAGE SECURITIES	S	9,469.70	$ 10.35		$ 97,981.36	
34	5/28/2013	xxxx1120	JP MORGAN SMALL CAP VALUE	B	3,131.12	$ 25.55	$ 3,240.00	$ 80,000.00	0.0405
	7/23/2013	xxxx1120	JP MORGAN SMALL CAP VALUE	S	3,131.12	$ 25.70		$ 80,439.66	

No	Trade Date	Account	Security Desc	B/S	Quantity	Price	Comm/Credit	Net Amount	Load %
35	8/7/2012	xxxx1120	PUTNAM EQUITY SPECTRUM	B	295.073	$ 29.63	$ 437.15	$ 8,743.00	0.0369
	8/23/2012	xxxx1120	PUTNAM EQUITY SPECTRUM	B	140.94	$ 29.80	$ 210.00	$ 4,200.00	
	8/28/2012	xxxx1120	PUTNAM EQUITY SPECTRUM	B	198.756	$ 29.75	$ 295.65	$ 5,913.00	
	8/29/2012	xxxx1120	PUTNAM EQUITY SPECTRUM	B	490.62	$ 29.85	$ 732.25	$ 14,645.00	
	9/12/2012	xxxx1120	PUTNAM EQUITY SPECTRUM	B	38.71	$ 31.00	$ 60.00	$ 1,200.00	
	9/20/2012	xxxx1120	PUTNAM EQUITY SPECTRUM	B	415.719	$ 30.79	$ 480.00	$ 12,800.00	
	10/8/2012	xxxx1120	PUTNAM EQUITY SPECTRUM	B	1,605.06	$ 30.84	$ 1,361.25	$ 49,500.00	
	11/6/2012	xxxx1120	PUTNAM EQUITY SPECTRUM	S	3,184.88	$ 30.23		$ 95,763.59	
36	2/12/2013	xxxx1120	PUTNAM EQUITY SPECTRUM	B	1,506.77	$ 32.52	$ 1,837.50	$ 49,000.00	0.0350
	3/13/2013	xxxx1120	PUTNAM EQUITY SPECTRUM	B	765.697	$ 32.65	$ 937.50	$ 25,000.00	
	3/21/2013	xxxx1120	PUTNAM EQUITY SPECTRUM	B	604.778	$ 33.07	$ 750.00	$ 20,000.00	
	5/20/2013	xxxx1120	PUTNAM EQUITY SPECTRUM	B	710.833	$ 35.17	$ 687.50	$ 25,000.00	
	7/10/2013	xxxx1120	PUTNAM EQUITY SPECTRUM	B	175.221	$ 36.16	$ 174.24	$ 6,336.00	
	7/12/2013	xxxx1120	PUTNAM EQUITY SPECTRUM	S	1,386.99	$ 35.35		$ 49,000.00	
	7/18/2013	xxxx1120	PUTNAM EQUITY SPECTRUM	S	2,376.31	$ 35.88		$ 85,231.90	
37	3/28/2012	xxxx1120	AMERICAN BEACON HIGH YIELD OPPOR.	B	1,466.28	$ 10.23	$ 525.00	$ 15,000.00	0.0350
	10/8/2012	xxxx1120	AMERICAN BEACON HIGH YIELD OPPOR.	B	548.204	$ 10.58	$ 203.00	$ 5,800.00	
	11/6/2012	xxxx1120	AMERICAN BEACON HIGH YIELD OPPOR.	B	3,682.72	$ 10.59	$ 1,365.00	$ 39,000.00	
	1/24/2013	xxxx1120	AMERICAN BEACON HIGH YIELD OPPOR.	S	5,697.20	$ 10.54		$ 59,242.17	
38	2/7/2013	xxxx1120	AMERICAN BEACON HIGH YIELD OPPOR.	B	1,379.22	$ 11.02	$ 607.96	$ 15,199.00	0.0362
	2/8/2013	xxxx1120	AMERICAN BEACON HIGH YIELD OPPOR.	B	4,296.35	$ 10.96	$ 1,648.08	$ 47,088.00	
	2/22/2013	xxxx1120	AMERICAN BEACON HIGH YIELD OPPOR.	B	126.364	$ 11.00	$ 48.65	$ 1,390.00	
	4/2/2013	xxxx1120	AMERICAN BEACON HIGH YIELD OPPOR.	B	135.321	$ 10.90	$ 51.63	$ 1,475.00	
	4/12/2013	xxxx1120	AMERICAN BEACON HIGH YIELD OPPOR.	B	1,141.55	$ 10.95	$ 437.50	$ 12,500.00	
	7/15/2013	xxxx1120	AMERICAN BEACON HIGH YIELD OPPOR.	S	7,078.81	$ 10.25		$ 72,527.78	
39	7/23/2013	xxxx1164	ALLIANCE BERNSTEIN HIGH INCOME	B	4,668.01	$ 9.94	$ 1,856.00	$ 46,400.00	0.0400
	7/24/2013	xxxx1164	ALLIANCE BERNSTEIN HIGH INCOME	B	5,393.15	$ 9.92	$ 2,140.00	$ 53,500.00	
	12/9/2013	xxxx1164	ALLIANCE BERNSTEIN HIGH INCOME	S	10,061.15	$ 9.38		$ 94,323.62	

No	Trade Date	Account	Security Desc	B/S	Quantity	Price	Comm/Credit	Net Amount	Load %
40	4/26/2013	xxxx1164	GROWTH FUND OF AMERICA	B	1,258.35	$ 38.94	$ 1,347.50	$ 49,000.00	0.0275
	7/15/2013	xxxx1164	GROWTH FUND OF AMERICA	B	715.99	$ 41.90	$ 825.00	$ 30,000.00	
	7/18/2013	xxxx1164	GROWTH FUND OF AMERICA	S	1,974.34	$ 40.70		$ 80,325.48	
41	2/28/2013	xxxx1164	FIDELITY ADVISOR COMMUN. EQUIP	B	4,969.57	$ 9.86	$ 2,450.00	$ 49,000.00	0.0500
	8/26/2013	xxxx1164	FIDELITY ADVISOR COMMUN.EQUIP	S	4,969.57	$ 10.21		$ 50,689.35	
42	4/26/2013	xxxx1164	FIDELITY ADVISOR LEVERAGE CO. STOCK	B	1,101.75	$ 46.29	$ 1,912.50	$ 51,000.00	0.0365
	7/10/2013	xxxx1164	FIDELITY ADVISOR LEVERAGE CO. STOCK	B	110.39	$ 48.99	$ 148.72	$ 5,408.00	
	8/20/2013	xxxx1164	FIDELITY ADVISOR LEVERAGE CO. STOCK	S	1,212.14	$ 47.76		$ 57,841.81	
43	9/21/2012	xxxx1164	INVESCO GLOBAL HEALTH CARE	B	1,403.61	$ 34.91	$ 2,450.00	$ 49,000.00	0.0399
	10/8/2012	xxxx1164	INVESCO GLOBAL HEALTH CARE	B	1,439.68	$ 34.73	$ 1,500.00	$ 50,000.00	
	4/4/2013	xxxx1164	INVESCO GLOBAL HEALTH CARE	S	1,421.31	$ 35.20		$ 50,000.00	
	4/5/2013	xxxx1164	INVESCO GLOBAL HEALTH CARE	S	1,421.98	$ 35.05		$ 49,810.40	
44	4/19/2012	xxxx1164	TRANSAMERICA CAPITAL GROWTH	B	603.795	$ 17.39	$ 498.75	$ 10,500.00	0.0475
	5/15/2012	xxxx1164	TRANSAMERICA CAPITAL GROWTH	B	1,355.42	$ 16.60	$ 1,068.75	$ 22,500.00	
	5/21/2012	xxxx1164	TRANSAMERICA CAPITAL GROWTH	S	1,959.22	$ 15.38		$ 30,102.76	
45	7/12/2012	xxxx1164	TRANSAMERICA CAPITAL GROWTH	B	334.807	$ 15.83	$ 251.75	$ 5,300.00	0.0475
	9/19/2012	xxxx1164	TRANSAMERICA CAPITAL GROWTH	S	334.807	$ 16.32		$ 5,434.05	
46	11/6/2012	xxxx1164	TRANSAMERICA CAPITAL GROWTH	B	2,222.90	$ 16.42	$ 1,733.75	$ 36,500.00	0.0475
	1/28/2013	xxxx1164	TRANSAMERICA CAPITAL GROWTH	S	2,222.90	$ 16.51		$ 36,670.06	
47	8/20/2013	xxxx1164	TRANSAMERICA CAPITAL GROWTH	B	2,684.90	$ 19.74	$ 1,457.50	$ 53,000.00	0.0275
	9/6/2013	xxxx1164	TRANSAMERICA CAPITAL GROWTH	S	129.903	$ 19.63		$ 2,500.00	

No	Trade Date	Account	Security Desc	B/S	Quantity	Price	Comm/Credit	Net Amount	Load %
48	12/11/2012	xxxx1164	TRANSAMERICA AEGON HIGH YIELD BOND	B	686.275	$ 10.20	$ 280.00	$ 7,000.00	0.0382
	12/13/2012	xxxx1164	TRANSAMERICA AEGON HIGH YIELD BOND	B	1,204.34	$ 10.13	$ 396.50	$ 12,200.00	
	1/30/2013	xxxx1164	TRANSAMERICA AEGON HIGH YIELD BOND	B	2,810.08	$ 10.32	$ 1,160.00	$ 29,000.00	
	2/4/2013	xxxx1164	TRANSAMERICA AEGON HIGH YIELD BOND	B	237.318	$ 10.29	$ 97.68	$ 2,442.00	
	2/25/2013	xxxx1164	TRANSAMERICA AEGON HIGH YIELD BOND	S	2,033.50	$ 9.85		$ 20,000.00	
49	2/26/2013	xxxx1164	TRANSAMERICA AEGON HIGH YIELD BOND	B	1,962.71	$ 10.19	$ 650.00	$ 20,000.00	0.0325
	9/6/2013	xxxx1164	TRANSAMERICA AEGON HIGH YIELD BOND	S	435.467	$ 9.53		$ 4,100.00	
50	4/26/2013	xxxx1164	LEGG MASON OPPORTUNITY	B	3,618.91	$ 13.54	$ 2,082.50	$ 49,000.00	0.0351
	7/18/2013	xxxx1164	LEGG MASON OPPORTUNITY	B	3,230.15	$ 14.86	$ 1,320.00	$ 48,000.00	
	7/24/2013	xxxx1164	LEGG MASON OPPORTUNITY	S	6,849.06	$ 14.23		$ 97,432.05	
51	3/28/2011	xxxx1164	NATIXIS CGM ADVISOR TARGETED EQUITY	B	4,955.99	$ 11.61	$ 2,301.56	$ 57,539.00	0.0400
	9/12/2011	xxxx1164	NATIXIS CGM ADVISOR TARGETED EQUITY	S	4,955.99	$ 8.85		$ 43,830.48	
52	2/28/2013	xxxx1164	NATIXIS CGM ADVISOR TARGETED EQUITY	B	4,242.42	$ 11.55	$ 1,960.00	$ 49,000.00	0.0359
	5/14/2013	xxxx1164	NATIXIS CGM ADVISOR TARGETED EQUITY	B	484.243	$ 13.01	$ 252.00	$ 6,300.00	
	6/10/2013	xxxx1164	NATIXIS CGM ADVISOR TARGETED EQUITY	B	3,095.24	$ 12.60	$ 1,170.00	$ 39,000.00	
	7/25/2013	xxxx1164	NATIXIS CGM ADVISOR TARGETED EQUITY	S	7,821.91	$ 12.14		$ 94,927.93	
53	4/4/2013	xxxx1164	PIMCO REAL ESTATE REAL RETURN STRATEGY	B	4,710.28	$ 5.35	$ 1,197.00	$ 25,200.00	0.0475
	4/5/2013	xxxx1164	PIMCO REAL ESTATE REAL RETURN STRATEGY	B	4,621.07	$ 5.41	$ 1,187.50	$ 25,000.00	
	4/5/2013	xxxx1164	PIMCO REAL ESTATE REAL RETURN STRATEGY	S	4,621.07	$ 5.41	$ 1,187.50	$ 25,000.00	
54	4/5/2013	xxxx1164	PIMCO REAL ESTATE REAL RETURN STRATEGY	B	4,672.90	$ 5.35	$ 1,000.00	$ 25,000.00	0.0400
	4/25/2013	xxxx1164	PIMCO REAL ESTATE REAL RETURN STRATEGY	B	8,957.95	$ 5.47	$ 1,960.00	$ 49,000.00	
	8/15/2013	xxxx1164	PIMCO REAL ESTATE REAL RETURN STRATEGY	S	12,576.92	$ 3.90		$ 49,000.00	
55	9/21/2012	xxxx1164	PNC MULTI-FACTOR SMALL CAP VALUE	B	1,828.82	$ 13.67	$ 1,187.50	$ 25,000.00	0.0475
	10/8/2012	xxxx1164	PNC MULTI-FACTOR SMALL CAP VALUE	B	1,557.86	$ 13.48	$ 997.50	$ 21,000.00	
	10/26/2012	xxxx1164	PNC MULTI-FACTOR SMALL CAP VALUE	S	3,386.69	$ 12.51		$ 42,337.44	

No	Trade Date	Account	Security Desc	B/S	Quantity	Price	Comm/Credit	Net Amount	Load %
56	2/7/2013	xxxx1164	PNC MULTI-FACTOR SMALL CAP VALUE	B	2,839.93	$ 14.20	$ 1,915.53	$ 40,327.00	0.0459
	2/25/2013	xxxx1164	PNC MULTI-FACTOR SMALL CAP VALUE	B	496.046	$ 13.91	$ 327.75	$ 6,900.00	
	2/26/2013	xxxx1164	PNC MULTI-FACTOR SMALL CAP VALUE	B	1,582.73	$ 13.90	$ 935.00	$ 22,000.00	
	6/6/2013	xxxx1164	PNC MULTI-FACTOR SMALL CAP VALUE	S	4,918.71	$ 14.84		$ 72,963.66	
57	9/21/2012	xxxx1164	PUTNAM EQUITY SPECTRUM	B	1,564.00	$ 31.33	$ 2,450.00	$ 49,000.00	0.0437
	10/8/2012	xxxx1164	PUTNAM EQUITY SPECTRUM	B	1,604.62	$ 31.16	$ 1,875.00	$ 50,000.00	
	10/26/2012	xxxx1164	PUTNAM EQUITY SPECTRUM	S	1,946.66	$ 29.81		$ 57,885.93	
	11/6/2012	xxxx1164	PUTNAM EQUITY SPECTRUM	S	1,221.96	$ 30.23		$ 36,540.30	
58	2/25/2013	xxxx1164	PUTNAM EQUITY SPECTRUM	B	413.003	$ 31.84	$ 657.50	$ 13,150.00	0.0408
	2/26/2013	xxxx1164	PUTNAM EQUITY SPECTRUM	B	1,141.41	$ 31.54	$ 1,350.00	$ 36,000.00	
	3/25/2013	xxxx1164	PUTNAM EQUITY SPECTRUM	S	1,554.41	$ 31.77		$ 49,353.64	
59	3/25/2013	xxxx1164	PUTNAM EQUITY SPECTRUM	B	1,554.41	$ 31.77		$ 49,353.64	
	3/25/2013	xxxx1164	PUTNAM EQUITY SPECTRUM	S	1,554.41	$ 31.77		$ 48,859.80	
60	2/28/2013	xxxx1164	COLUMBIA GLOBAL INFRASTRUCTURE	B	2,270.62	$ 21.58	$ 1,837.50	$ 49,000.00	0.0375
	6/10/2013	xxxx1164	COLUMBIA GLOBAL INFRASTRUCTURE	B	1,473.06	$ 23.76	$ 1,312.50	$ 35,000.00	
	7/12/2013	xxxx1164	COLUMBIA GLOBAL INFRASTRUCTURE	S	1,750.33	$ 22.87		$ 40,000.00	
	7/23/2013	xxxx1164	COLUMBIA GLOBAL INFRASTRUCTURE	S	1,993.36	$ 23.32		$ 46,455.09	
61	9/21/2012	xxxx1164	AMERICAN BEACON HIGH YIELD OPPOR.	B	4,596.62	$ 10.66	$ 1,960.00	$ 49,000.00	0.0375
	10/8/2012	xxxx1164	AMERICAN BEACON HIGH YIELD OPPOR.	B	4,725.90	$ 10.58	$ 1,750.00	$ 50,000.00	
	7/15/2013	xxxx1164	AMERICAN BEACON HIGH YIELD OPPOR.	S	9,322.52	$ 10.25		$ 95,525.84	
62	4/26/2013	xxxx1164	AMERICAN FUNDS SMALLCAP WORLD	B	1,122.11	$ 45.45	$ 1,402.50	$ 51,000.00	0.0275
	7/24/2013	xxxx1164	AMERICAN FUNDS SMALLCAP WORLD	S	1,122.11	$ 46.41		$ 52,047.22	

No	Trade Date	Account	Security Desc	B/S	Quantity	Price	Comm/Credit	Net Amount	Load %
63	2/28/2013	xxxx1164	FRANKLIN MUTUAL EUROPEAN	B	2,176.81	$ 22.51	$ 1,837.50	$ 49,000.00	0.0349
	7/18/2013	xxxx1164	FRANKLIN MUTUAL EUROPEAN	B	824.063	$ 24.27	$ 750.00	$ 20,000.00	
	7/24/2013	xxxx1164	FRANKLIN MUTUAL EUROPEAN	B	1,059.55	$ 24.35	$ 722.40	$ 25,800.00	
	7/26/2013	xxxx1164	FRANKLIN MUTUAL EUROPEAN	S	4,060.42	$ 23.37		$ 94,842.04	
64	7/11/2011	xxxx1252	AMERICAN BEACON SMALL CAP VALUE	B	1,355.14	$ 21.40	$ 1,160.00	$ 29,000.00	0.0400
	2/21/2012	xxxx1252	AMERICAN BEACON SMALL CAP VALUE	S	1,355.14	$ 20.73		$ 28,062.05	
65	7/11/2011	xxxx1252	AMERICAN BEACON INTERNATIONAL EQUITY	B	1,617.40	$ 17.93	$ 1,160.00	$ 29,000.00	0.0400
	7/21/2011	xxxx1252	AMERICAN BEACON INTERNATIONAL EQUITY	S	21.566	$ 17.62		$ 350.00	
	4/4/2012	xxxx1252	AMERICAN BEACON INTERNATIONAL EQUITY	S	1,595.84	$ 15.26		$ 24,322.44	
66	7/11/2011	xxxx1252	AMERICAN BEACON LARGE CAP VALUE	B	1,442.79	$ 20.10	$ 1,160.00	$ 29,000.00	0.0400
	11/7/2011	xxxx1252	AMERICAN BEACON LARGE CAP VALUE	S	1,442.79	$ 18.11		$ 26,098.85	
67	7/11/2011	xxxx1252	COLUMBIA PACIFIC/ASIA FUND	B	3,169.40	$ 9.15	$ 1,450.00	$ 29,000.00	0.0500
	4/4/2012	xxxx1252	COLUMBIA PACIFIC/ASIA FUND	S	3,169.40	$ 7.99		$ 25,323.50	
68	7/11/2011	xxxx1252	DIAMOND HILL SMALL-MID CAP	B	2,083.33	$ 13.92	$ 1,305.00	$ 29,000.00	0.0450
	10/18/2011	xxxx1252	DIAMOND HILL SMALL-MID CAP	S	2,083.33	$ 11.70		$ 24,345.00	
69	7/11/2011	xxxx1252	EATON VANCE ATLANTA CAPITAL SMID-CAP	B	1,749.10	$ 16.58	$ 1,450.00	$ 29,000.00	0.0500
	10/21/2011	xxxx1252	EATON VANCE ATLANTA CAPITAL SMID-CAP	S	1,749.10	$ 14.28		$ 24,947.08	
70	7/11/2011	xxxx1252	FEDERATED KAUFMANN SMALL CAP	B	1,000.69	$ 28.98	$ 1,450.00	$ 29,000.00	0.0500
	9/21/2011	xxxx1252	FEDERATED KAUFMANN SMALL CAP	S	1,000.69	$ 21.28		$ 21,264.68	
71	10/12/2012	xxxx1252	INVESCO GLOBAL HEALTH CARE	B	574.218	$ 34.83	$ 1,000.00	$ 20,000.00	0.0438
	11/6/2012	xxxx1252	INVESCO GLOBAL HEALTH CARE	B	859.076	$ 33.99	$ 1,168.00	$ 29,200.00	
	12/12/2012	xxxx1252	INVESCO GLOBAL HEALTH CARE	B	92.937	$ 32.28	$ 120.00	$ 3,000.00	
	1/30/2013	xxxx1252	INVESCO GLOBAL HEALTH CARE	S	952.013	$ 32.93		$ 31,319.79	
	1/30/2013	xxxx1252	INVESCO GLOBAL HEALTH CARE	S	574.218	$ 32.93		$ 18,879.00	

No	Trade Date	Account	Security Desc	B/S	Quantity	Price	Comm/Credit	Net Amount	Load %
72	5/17/2012	xxxx1252	TRANSAMERICA CAPITAL GROWTH	B	3,022.83	$ 16.21	$ 2,327.50	$ 49,000.00	0.0475
	5/21/2012	xxxx1252	TRANSAMERICA CAPITAL GROWTH	S	3,022.83	$ 15.38		$ 46,461.05	
73	10/10/2012	xxxx1252	TRANSAMERICA CAPITAL GROWTH	B	2,982.35	$ 16.43	$ 2,327.50	$ 49,000.00	0.0475
	1/28/2013	xxxx1252	TRANSAMERICA CAPITAL GROWTH	S	2,982.35	$ 16.51		$ 49,208.58	
74	2/4/2013	xxxx1252	TRANSAMERICA CAPITAL GROWTH	B	113.064	$ 17.07	$ 91.68	$ 1,930.00	0.0475
	2/13/2013	xxxx1252	TRANSAMERICA CAPITAL GROWTH	S	113.064	$ 16.44		$ 1,828.77	
75	7/11/2011	xxxx1252	JP MORGAN RUSSIA FUND	B	1,978.17	$ 14.66	$ 1,377.50	$ 29,000.00	0.0475
	9/12/2011	xxxx1252	JP MORGAN RUSSIA FUND	S	1,978.17	$ 10.28		$ 20,305.61	
76	7/11/2011	xxxx1252	OPPENHEIMER GOLD & SPECIAL MINERALS	B	596.585	$ 48.61	$ 1,377.50	$ 29,000.00	0.0475
	7/14/2011	xxxx1252	OPPENHEIMER GOLD & SPECIAL MINERALS	S	596.585	$ 48.38		$ 28,862.78	
77	7/11/2011	xxxx1252	PIMCO REAL ESTATE REAL RETURN STRATEGY	B	5,482.04	$ 5.29	$ 1,377.50	$ 29,000.00	0.0475
	9/27/2011	xxxx1252	PIMCO REAL ESTATE REAL RETURN STRATEGY	S	5,482.04	$ 4.39		$ 24,036.16	
78	7/11/2011	xxxx1252	PUTNAM VOYAGER FUND	B	1,167.47	$ 24.84	$ 1,450.00	$ 29,000.00	0.0500
	9/27/2011	xxxx1252	PUTNAM VOYAGER FUND	S	1,167.47	$ 19.00		$ 22,151.97	
79	10/10/2012	xxxx1252	PUTNAM EQUITY SPECTRUM	B	1,590.39	$ 30.81	$ 1,837.50	$ 49,000.00	0.0375
	11/6/2012	xxxx1252	PUTNAM EQUITY SPECTRUM	S	1,590.39	$ 30.23		$ 47,566.80	
80	7/11/2011	xxxx1252	TEMPLETON EMERGING MARKETS SMALL CAP	B	2,241.11	$ 12.94	$ 1,450.00	$ 29,000.00	0.0500
	10/25/2011	xxxx1252	TEMPLETON EMERGING MARKETS SMALL CAP	S	520.704	$ 9.66		$ 5,000.00	
	12/5/2011	xxxx1252	TEMPLETON EMERGING MARKETS SMALL CAP	S	107.741	$ 9.56		$ 1,000.00	
	2/21/2012	xxxx1252	TEMPLETON EMERGING MARKETS SMALL CAP	S	1,612.67	$ 10.69		$ 17,209.42	
81	6/17/2011	xxxx1168	NATIXIS CGM ADVISOR TARGETED EQUITY	B	1,895.74	$ 10.55	$ 800.00	$ 20,000.00	0.0400
	6/28/2011	xxxx1168	NATIXIS CGM ADVISOR TARGETED EQUITY	B	611.872	$ 10.95	$ 268.00	$ 6,700.00	
	7/6/2011	xxxx1168	NATIXIS CGM ADVISOR TARGETED EQUITY	S	2,507.61	$ 10.92		$ 27,353.07	

No	Trade Date	Account	Security Desc	B/S	Quantity	Price	Comm/Credit	Net Amount	Load %
82	1/28/2013	xxxx1168	AMERICAN BEACON HIGH YIELD OPPORTUNITIES	B	396.754	$ 11.09	$ 176.00	$ 4,400.00	0.0400
	3/18/2013	xxxx1168	AMERICAN BEACON HIGH YIELD OPPORTUNITIES	S	396.754	$ 10.41		$ 4,017.61	
83	12/29/2011	xxxx1237	TRANSAMERICA AEGON HIGH YIELD BOND	B	2,610.45	$ 9.28	$ 969.00	$ 24,225.00	0.0400
	4/4/2012	xxxx1237	TRANSAMERICA AEGON HIGH YIELD BOND	S	2,610.45	$ 9.28		$ 24,195.00	
84	12/26/2012	xxxx1237	INVESCO GLOBAL HEALTH CARE	B	528.443	$ 32.17	$ 850.00	$ 17,000.00	0.0500
	1/28/2013	xxxx1237	INVESCO GLOBAL HEALTH CARE	S	528.443	$ 32.78		$ 17,292.36	