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Form 101

January 2003

Suspicious Activity Report by the Securities and Futures Industries

Please type or print. Always complete entire report. Items

marked with an asterisk * are considered critical. (See instructions).



1 Check the box if this report corrects a prior report (see instructions, page 7)

Part 1 Subject Information 2 Check box (a) If multiple subjects box (b) subject information unavailable 13 Individual's list name or entity's full name 14 First name 5 Middle initial 6 Also known as (AKA - individual), doing business as (DBA - entity) 7 Occupation or type of business 19 10 State 111 ZIP code 12 Country (if not U.S.) 13 E-mail address (if available) 14 State 111 ZIP code 12 Country (if not U.S.) 13 E-mail address (if available) 14 State Acct # yes () Acct # yes () Acct # yes () MM (DD 'YYY') 17 Covernment issued identification (if available) acct # yes () MM (DD 'YYY') 17 Covernment issued identification (if available) g Issuing state or country () Image: Ima					
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Part III Law Enforcement or Regulatory Contact Information 2					
31 If a law enforcement or regulatory auth a DEA f U.S. S b U.S. Attorney (**32) g CFTC c IRS h SEC d FBI i NASD e U.S. Customs Svc. j NFA	ecret Svc. k NY Si I Other m Other n Other	tock Exchg. Registered Futu registered entit	p State rres Assoc q Foreig	securities regulator	
32 Other authority contacted (for Box 31 I	through r) ** List U.S. Attorne	ey office here.	33 Name of individual cont	acted (for all of Box 31)	
34 Telephone number of individual contacted (box 33) 35 Date contacted $\begin{pmatrix} & & & \\ & & & \\ & & & & \\ & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & & & & \\ & & & &$					
Part IV Reporting Financi	al Institution Inform	ation			
*36 Name of financial institution or sole pro	prietorship		*37 EIN/	SSN/ITIN 	
*39 City			*40 State *41 ZIP	code 	
42 Additional branch address locations ha	andling account, activity or cu	istomer.	43 Multiple loc	ations (see instructions)	
44 City			45 State 46 ZIP	code	
47 Central Registration Depository number	48 SEC ID number	49	Nat'l. Futures Ass'n. ID num	ber	
50 Has this reporting individual/entity coord	· .		dual/entity? Yes (Provi	ide details in Part VI) No	
 51 Type of institution or individual- Check a Agriculture trade option merchant b Affiliate of bank holding company c Commodity pool operator d Commodity trading advisor e Direct participation program f Futures commission merchant g Futures floor broker h Futures floor trader i Introducing Broker-Futures j Investment adviser 	box(es) for functions that ap k Investment comp I Market maker m Municipal securit n National Futures o Registered Entit p Other Registered q Securities broker s Securities broker t Securities floor b	bany - mutual fun ties dealer Assoc. y-futures d Futures Assn. r - clearing r - introducing	v Self regulatory of w Specialist x Subsidiary of bar y U.S. Government	rganization (SRO) nk t broker-dealer t interdealer broker	
Part V Contact For Assista	nce				
*52 Last name of individual to be contacte	d regarding this report	*53 First name		*54 Middle initial	
*55 Title/Position	*56 Work phone number $\begin{pmatrix} 1 & 1 \\ 1 & 1 \\ 1 & 1 \end{pmatrix}$		*57 Date report pi	repared /// MM DD YYYY	
Paperwork Reduction Act Notice: The p enforcement agencies of suspicious transac authority contained in 31 U.S.C. 5318(g). Inf and the U.S. Departments of Justice and Treas burden for this form is estimated to average 4 the instructions, and complete the informatior to the Office of Management and Budget, Pap Paperwork Reduction Act, P.O. Box 39, Vier required to respond to, a collection of inform	ctions that occur by, through, ormation collected on this repo- sury, and other authorized auth 5 minutes per response, and ir o collection. Send comments re- perwork Reduction Project, Wa ana VA 22183-0039. The age	or at the financi ort is confidential orities may use an includes time to ga egarding this burd shington, DC 205 ency may not cor	al institutions. This report is (31 U.S.C. 5318(g)). Federal Id share this information. Publ ther and maintain information en estimate, including sugges 03 <u>and</u> to the Financial Crime induct or sponsor, and an org	required by law, pursuant to securities regulatory agencies lic reporting and recordkeeping of the required report, review stions for reducing the burden, is Enforcement Network, Attn.:	

Part VI Suspicious Activity Information - Narrative *

Explanation/description of suspicious activity(ies). This section of the report is <u>critical</u>. The care with which it is completed may determine whether <u>or not the described activity and its possible criminal nature are clearly understood by investigators</u>. Provide a clear, complete and chronological description (**not exceeding this page and the next page**) of the activity, including what is unusual, irregular or suspicious about the transaction(s), using the checklist below as a guide, as you prepare your account.

- a. Describe conduct that raised suspicion.
- b. Explain whether the transaction(s) was completed or only attempted.
- c. Describe supporting documentation (e.g. transaction records, new account information, tape recordings, e-mail messages, correspondence, etc.) and retain such documentation in your file for five years.
- d. **Explain** who benefited, financially or otherwise, from the transaction(s), how much and how (if known).
- e. **Describe and retain** any admission, or explanation of the transaction(s) provided by the subject(s), or other persons. Indicate to whom and when it was given.
- f . **Describe and retain** any evidence of cover-up or evidence of an attempt to deceive federal or state examiners, SRO, or others.
- g. Indicate where the possible violation of law(s) took place (e.g., main office, branch, other).
- h. Indicate whether the suspicious activity is an isolated incident or relates to another transaction.
- i. Indicate whether there is any related litigation. If so, specify the name of the litigation and the court where the action is pending.
- Recommend any further investigation that might assist law enforcement authorities.
- k. Indicate whether any information has been excluded from this report; if so, state reasons.
- I. Indicate whether U.S. or foreign currency and/or U.S. or foreign negotiable instrument(s) were involved. If foreign, provide the amount, name of currency, and country of origin.

- m. **Indicate** "<u>Market where traded</u>" and "<u>Wire transfer identifier</u>" information when appropriate.
- n. Indicate whether funds or assets were recovered and, if so, enter the dollar value of the recovery in whole dollars only.
- o. Indicate any additional account number(s), and any foreign bank(s) account number(s) which may be involved.
- p. Indicate for a foreign national any available information on subject's passport(s), visa(s), and/or identification card(s). Include date, country, city of issue, issuing authority, and nationality.
- q. Describe any suspicious activities that involve transfer of funds to or from a foreign country, or transactions in a foreign currency. Identify the country, sources and destinations of funds.
- r. Describe subject(s) position if employed by the financial institution.
- s. Indicate whether securities, futures or options were involved. If so, list the type, CUSIP® number or ISID® number, and amount.
- t. Indicate the type of institution filing this report, if this is not clear from Part IV. For example, an investment advisor that is managing partner of a limited partnership that is acting as a hedge fund that detects suspicious activity tied in part to its hedge fund activities should note that it is operating as a hedge fund.
- u. Indicate in instances when the subject or entity has a CRD or NFA number, what that number is.
- If correcting a prior report (box 1 checked), complete the form in its entirety and note the corrected items here in Part VI.

Information already provided in earlier parts of this form need not necessarily be repeated if the meaning is clear. Supporting documentation should not be filed with this report. Maintain the information for your files.

Enter explanation/description in the space below. Continue on the next page if necessary.

Suspicious Activity Report Narrative (continued)