FinCEN Form 101

Suspicious Activity Report by the Securities and Futures Industries



January 2003

Please type or print. Always complete entire report. Items marked with an asterisk * are considered critical. (See instructions).

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| OLID 11 1500 0010 | |

1 Check the box if this report corrects a prior report (see instructions, page 3) 2 Check box (a) subject information unavailable **Subject Information** if multiple subjects box (b) Part I *3 Individual's last name or entity's full name *4 First name 5 Middle initial 6 Also known as (AKA - individual), doing business as (DBA - entity) 7 Occupation or type of business *8 Address *9 City 10 State 11 ZIP code *12 Country (if not U.S.) 13 E-mail address (if available) *15 Account number(s) affected, if any. Indicate if closed. 16 Date of birth *14 SSN/ITIN (individual), or EIN (entity) yes
Acc't # DD YYYY 17 Government issued identification (If available) Driver's license/state ID Passport Alien registration Corporate/Partnership Resolution Other f ID Number g Issuing state or country 20 Is individual/business associated/affiliated 18 Phone number - work 19 Phone number - home with the reporting institution? (See instructions) a Yes b No Part II **Suspicious Activity Information** *22 Total dollar amount involved in suspicious activity *21 Date or date range of suspicious activity \$ DD MM 23 Instrument type (Check all that apply) Bonds/Notes Commodity options Commodity type (Please identify) Security Futures Products Cash or equiv. Commercial paper Stocks Instrument description Commodity futures contract Warrants Money Market Mutual Fund Other securities Market where traded Mutual Fund Other non-securities (Enter approprite three or four-letter code.) **OTC** Derivatives Foreign currency futures Other (Explain in Part IV) g Other derivatives Foreign currencies 24 CUSIP® number 25 CUSIP® number 26 CUSIP® number 28 CUSIP® number 27 CUSIP® number 29 CUSIP® number Type of suspicious activity: Significant wire or other transactions Identity theft Bribery/gratuity without economic purpose Insider trading b Check fraud Suspicious documents or ID presented Mail fraud Computer intrusion Terrorist financing Market manipulation Credit/debit card fraud d Wash or other fictitious trading Money laundering/Structuring Embezzlement/theft Wire fraud Prearranged or other non-competitive trading Futures fraud Other (Describe in Part VI) Securities fraud Forgery

| Part III Law Enforcem | ent or Regulatory Co | ontact Informa | ation | 2 |
|---|---|--|--|---|
| 31 If a law enforcement or regulatory a | uthority has been contacted (ex | cluding submission of | f a SAR) check the appropria | te box. |
| a DEA f U.S. b U.S. Attorney (**32) g CFT c IRS h SEC d FBI i NA: e U.S. Customs Svc. j NF: | C | Stock Exchg. r Registered Futures r registered entity-future r state/local SRO (PHLX, PCX, CE | Assoc q Foreign ures r Other (Expla | ities regulator ain in Part VI) |
| 32 Other authority contacted (for Box 3 | 1 I through r) ** List U.S. Attorn | ey office here. 33 | Name of individual contacted | (for all of Box 31) |
| 34 Telephone number of individual contact (| 1 | 35 Date contacted | / | YYY |
| 8 | cial Institution Inform | ation | *07. FIN. (OON) | ITIN I |
| *36 Name of financial institution or sole *38 Address | proprietorship | | *37 EIN/SSN/ | |
| *39 City | | | *40 State | |
| 42 Additional branch address locations | handling account, activity or co | ustomer. | 43 Multiple locations | (see instructions) |
| 44 City | | | 45 State | |
| 47 Central Registration Depository number | er 48 SEC ID number | 49 Nat' | 'I. Futures Ass'n. ID number | |
| | | | | |
| 50 Has this reporting individual/entity co | pordinated this report with anoth | ner reporting individual | l/entity? Yes (Provide de | tails in Part VI) No |
| 51 Type of institution or individual- Che a | nt k Investment com y l Market maker m Municipal securi n National Futures o Registered Entii p Other Registere q Securities broke r Securities broke s Securities deale t Securities floor | pany - mutual fund unities dealer was Assoc. when the second control of the second contr | Self regulatory organiz Specialist Subsidiary of bank U.S. Government broke U.S. Government intercomment | ation (SRO) er-dealer dealer broker |
| *55 Title/Position | *56 Work phone number | | *57 Date report prepare | d l |
| | | | - MN | /// M DD YYYY |

Paperwork Reduction Act Notice: The purpose of this form is to provide an effective means for financial institutions to notify appropriate law enforcement agencies of suspicious transactions that occur by, through, or at the financial institutions. This report is required by law, pursuant to authority contained in 31 U.S.C. 5318(g). Information collected on this report is confidential (31 U.S.C. 5318(g)). Federal securities regulatory agencies and the U.S. Departments of Justice and Treasury, and other authorized authorities may use and share this information. Public reporting and recordkeeping burden for this form is estimated to average 45 minutes per response, and includes time to gather and maintain information for the required report, review the instructions, and complete the information collection. Send comments regarding this burden estimate, including suggestions for reducing the burden, to the Office of Management and Budget, Paperwork Reduction Project, Washington, DC 20503 and to the Financial Crimes Enforcement Network, Attn.: Paperwork Reduction Act, P.O. Box 39, Vienna VA 22183-0039. The agency may not conduct or sponsor, and an organization (or a person) is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

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 or not the described activity and its possible criminal nature are clearly understood by investigators. 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.
- 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.
- Indicate whether any information has been excluded from this report; if so, state reasons.
- 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 "Market where traded" and "Wire transfer identifier" information when appropriate.
- Indicate whether funds or assets were recovered and, if so, enter the dollar value of the recovery in whole dollars only.
- 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) | 4 |
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