Richard M. Nummi, Esq.

Nummi & Associates, P.A. (813) 727-3673 - rnummi@mac.com

Executive Profile: Hands-on, results oriented senior regulatory compliance executive and securities attorney. Highly analytical, able to quickly comprehend complex regulatory requirements and develop detailed action plans to forestall potential issues. Highly personable manager of both routine and cause regulatory examinations, skilled at negotiating successful resolutions of both. Key strengths include: organizational understanding, multi-year experience with development/testing and final implementation of best practice strategic corporate compliance programs, exceptional organization, highly personable self-starter and an excellent lawyer. Personal leadership goals include the cultivation of respect from executives, clients and co-workers, the mentoring of others, and the ability to motivate team members to deliver an industry standard compliance program. An additional goal is to respect and recognize that diversity in professional and personal backgrounds adds value to any organization's products and services. Highly proficient in oral and written communications. Direct, assertive, positive, and persuasive. Known for the ability to create collaborative relationships; facilitate discussions with colleagues, clients, executive leadership, and staff members. A track record of professionalism, courtesy, and tact in dealings at all levels from line staff to executive management. Extensive experience in public speaking and presentations.

Practical Experience: Over 20 years of progressively broad-based executive regulatory compliance experience encompassing project management, leadership motivation, supervision and performance management, human resources management, business liaison relations, systems analysis conversions, budgeting negotiations, policies and procedures, problem solving, and change management. Specific training and experience as field examiner and auditor utilizing all aspects of standard accounting and GAAP review principles. Skilled at MS Word, Excel, Access, PowerPoint and Visio; Planview; FileNet Optical Imaging Systems; and Internet.

Employment

<u>Nummi & Associates, P.A.</u> (NAPA) – Managing Partner and Chief Legal Officer – Specialized Regulatory Law Firm, Financial Industry Business Consultant, Crisis Manger, Risk Management and Abatement. 11/1/05 – Current

NAPA Client Sampling

Accounting & Compliance International - Financial Industry Media commentator, published author, nationally recognized expert in securities regulation and governance. Fully versed in all aspects of financial industry regulation and oversight. ACI's clients include some of the world's most respected financial companies. Since the founding ACI, Mr. Nummi has been instrumental in expanding the firm to its current status as the one of the financial industry's leading providers of compliance consultation services. Offices located in New York, New Jersey, Florida, South Carolina, California, Connecticut and Texas. International offices located in Helsinki Finland. Opened: Beijing and Hong Kong.

<u>National Regulatory Service</u> (NRS) – Executive Consultant to several securities industry firms and vendors. National speaker, published author and industry commentator. Contributor to numerous industry professional journals and publications covering all aspects of 33, 34 and 40 Act implementation. Representing a broad spectrum of broker-dealers, Issuers, registered investment advisors and vendors to the securities industry. Offices located in Connecticut.

<u>CSG Holdings</u> (CSG) – Outside General Counsel to the largest pension consulting firm in the U.S. In excess of 25 billion under advisement, including the New York Common Retirement Fund, Shelby County, New Orleans Fire Fighters, Municipal Employees Retirement and Firefighters Retirement Systems. Establishment, compliance and operations for 3 subsidiary registered investment advisors. Managed all regulatory contacts and inquiries, responsible for overall compliance effort of the entity.

<u>Commerce Asset Management</u> (CAM) – Outside General Counsel for hedge fund compliance operations. Responsible for regulatory contact and relations, general compliance and operations oversight.

<u>Merrimac Securities</u> – Outside General Counsel for independent broker-dealer. Responsible for all legal and regulatory issues. Counsel for arbitration and regulatory disciplinary actions. Advisor to the CEO on strategic direction and business expansion opportunities.

<u>R.F. Lafferty & Co</u> – Compliance consulting client. Responsible for all firm regulatory interaction and securities compliance conformance. Performed ongoing 3012, 3130 and AML Reviews for independent broker-dealer.

<u>John Thomas Financial</u> – Hired to perform risk mitigation and crisis regulatory consulting to mid-size broker-dealer. Responsible for assessment and overall improvement of Compliance Department. Created entire written supervisory procedures to be submitted to regulators after findings systemic failure. Crisis management advisor to Chairman of organization.

<u>Freedom Investments</u> - Outside General Counsel for independent broker-dealer. Responsible for all legal and regulatory issues. Counsel for arbitration and regulatory disciplinary actions. Advisor to the CEO on strategic direction and business expansion opportunities.

KCD Financial - Outside General Counsel for independent broker-dealer. Responsible for all legal and regulatory issues. Counsel for arbitration and regulatory disciplinary actions. Advisor to the CEO on strategic direction and business expansion opportunities.

GAH Holdings Corporation – Corporate Counsel – CCO – Financial Industry

5002 W. Waters Ave., Tampa Florida 33634

05/31/04 - 11/01/05

Executive Vice President, Corporate Counsel, Chief Compliance Officer, Corporate Secretary

Partner and Director of GAH Holdings, parent company to GunnAllen Financial, a member of FINRA and registered broker-dealer. Principal executive responsible for supervisory oversight legal and compliance with all aspects of securities industry rules and regulations. Primary architect of the firms written supervisory procedures and surveillance systems. Close coordination/cooperation with FINRA/SEC/State regulators for over 34 examinations of the firm and its business practices. 42 direct reports.

<u>The United States Securities and Exchange Commission</u> – Securities Regulator

450 5th St. NW, Washington, D.C. 20549

12/31/00 - 05/31/04.

Senior Attorney with the Office of Compliance Inspections and Examinations (33, 34 and 40 Act). Assignments included: Mutual Fund Governance Sweep, Asian Markets, Mutual Fund Breakpoint Sweep, Variable Annuity Bonus Sweep, Independent Contractor / Registered Representative Supervisory Sweep, Developer and Senior Attorney – Bank Branch Examinations, Instructor SEC Phase I, II and III Examiner Training. Significant accomplishments include: Featured speaker at numerous national securities/industry conferences, panelist and presenter at several trade conferences, the research, development and implementation of several recent industry sweeps (Variable Insurance Products, Remote Supervision, Bank Securities Sales, Implementation of Reg. SP and Gramm-Leach-Bliley. Developed automated examination tracking module which significantly decreased the amount of time required to process examination findings, currently developing an automated (computer based) examination which will allow a "paperless" audit thereby increasing the number of SEC field examinations.

<u>Jefferson Pilot Financial</u> – CCO – Corporate Counsel

1 Granite Place, Concord, NH 03301

09/14/98- 12/31/00

Vice President, Chief Compliance Officer

Chief Compliance Officer for Jefferson Pilot Securities/Jefferson Pilot Variable and Jefferson Pilot Investment Advisory Services in 9/98. JP is the eleventh largest insurance company operating in the U.S. Responsible for

providing leadership, guidance and overall direction of the corporate compliance program. Primary duties included oversight of all aspects of insurance/securities sales supervision, market conduct and the distribution of variable securities products. Conducted complete evaluation of existing compliance/supervisory structure. Proposed and implemented comprehensive enhancement program to significantly improve oversight/risk management process. Personally developed and implemented computerized audit/examination system (utilization of Microsoft Excel and Access to create field portable audit module incorporating current sales data, previous audits, field imaging, and remote connectivity). Supervisory responsibility includes direction of the following areas: Field Audit Program, Advertising Review, Surveillance and Market Conduct, Registered Investment Advisor, Variable Products and Registration/Licensing. Additional responsibilities include: primary liaison with federal, state and SRO regulatory authorities and comprehensive legal research on multi-source securities regulations (including tracking legislative initiatives, proposing and developing solutions to new regulations and application/dissemination of the new initiatives). Directly responsible for daily supervision of 45 subordinates and approximately 2500 widely dispersed registered representatives and over 40 individually registered investment advisory firms. Field supervision was accomplished by utilizing "Regional Compliance Managers", licensed principals, functioning as regional auditors and compliance consultants. Ancillary duties include the direction of ongoing internal audits of the various corporate business units and subsidiaries and the oversight of multiple field investigations. Author of industry "White Paper": "Recent Developments and the Future of Securities Sales Supervision". 28 direct reports.

INVEST Financial Corporation / Zurich-Kemper

2701 N. Rocky Pt. Dr. Tampa, Fl.

07/01/96 - 09/14/98

Vice President, Chief Compliance Officer, Associate General Counsel, Trial and Arbitration Counsel

Vice President, Chief Compliance Officer and Associate General Counsel for INVEST Financial, wholly owned subsidiary of Kemper Insurance, the largest independent provider of financial/brokerage services to banks in the world. Performed complete redesign of INVEST's Compliance Department to improve regulatory compliance with federal regulatory mandates (FDIC/OCC/OTS - "The Interagency Statement"). Frequent interaction with regulators from over 25 agencies provided continuing improvement in policies and procedures for operation of securities sales in financial institutions. Successfully led INVEST through over 15 separate audits including that of The Federal Reserve Board, Office of the Comptroller of Currency, NASD and SEC. Personally wrote Compliance Manual, Written Supervisory Procedures, Operations Manual for Securities Sales in Financial Institutions and taught Compliance to Representative classes. Gave regular speeches and was recognized by peers as an expert on securities sales activities in banks. Redesigned branch/bank examination program, Enhanced surveillance efforts by applying the latest technological advances to market conduct review. Evaluated, developed and deployed rigorous advertising review and registration programs. Attended numerous regulatory symposia as an expert on the merging Secondary responsibilities: Directing/performing special investigations of of securities/bank product sales. significant regulatory violations and representative malfeasance. Reviews typically included forensic audits of individual trade review as well as global trade pattern analysis. Conducted arbitration/mediation/litigation as primary counsel.

Morgan Stanley Dean Witter Reynolds

3251 3rd Ave. N. St. Petersburg, Fl.

08/01/94 - 07/01/96

Registered Representative - Portfolio management, financial analysis and planning based upon a broad spectrum of corporate investment products. Specialized in the establishment of goals, performance and risk criteria for individual, institutional, and retirement financial plans. Speaker at numerous public seminars. Holder of numerous awards for performance. Branch compliance representative.

United States Navy

(World-wide assignments)

06/01/77 - 12/01/89

<u>Naval Intelligence</u> - Assigned as the Photo Interpretation and Briefing Block Instructor at the Armed Forces Air Intelligence Training Center. Collateral duties included Staff Intelligence Briefer and Intelligence Watch Officer for Commander in Chief Central Command (CENTCOM), General Military Training Coordinator. Received Master Training Specialist Award from the Chief of Naval Technical Training. Revised and taught the Amphibious Intelligence section of the Intelligence Officer Training Course. Developed and taught the photo interpretation section of the new 11 week Naval Intelligence Specialist Course. Received personal recognition for implementation of advanced photo and satellite imagery recognition algorithms and techniques from VADM. Ramsey, Deputy Commmander in Chief, US Space Command (CINCSPACE). Contributed material support to U.S./Iraqi conflict reduction negotiations, designated senior intelligence officer for Commander Middle East Force, arriving

combatants, designated intelligence briefer for RADM Benson, Commander, Middle-East Forces (COMIDEASTFOR). Conducted extensive development and testing of Fleet Intelligence Center Pacific Intelligence data base. Achieved designation as Intelligence Watch Officer, Battle Staff, COMIDEASTTFOR. Assigned as Submarine Launched Ballistic Missile Analyst, Strategic Threat Division, North American Aerospace Defense (NORAD). Collateral duties included analysis and dissemination of intelligence dealing with foreign missile threats to North America. Graphic, analytical and briefing support to the Commander in Chief NORAD. Wrote background briefings for CINCNORAD regarding Soviet Strategic Missile Systems and probable deployment parameters. Passably conversant in German with the ability to read and translate articles, technical material and the like into English. Completed the following courses of instruction while in military service: Intelligence Specialist A, Course NV1606-0030 (14 wks), Technical Intructor, Course AF1406-0030 Ver. 1, (4 wks), Amphibious Intelligence Officer, Course NV 1606-0004 (2 wks) and Intelligence Officer Imagery Training, Course AF1606-0061 (27 wks). Following the Special Background Investigation (SBI), maintained Top Secret, SCI Security Clearance throughout military service.

<u>Naval Aviation</u> - Assistant to the Operations Duty Officer responsible for the operational efficiency of NAS Cubi Point Air Station. As Flight Planning Dispatcher at NAS Jacksonville, NAS Cubi Point, USS America and NAS Norfolk, received processed and posted flight plans and aircraft movement messages. Coordinated with other air traffic control agencies regarding incoming and outgoing communications, acted as flight guard and initiator of overdue action messages. As Radar Arrival/Clearance Delivery at NAS Jacksonville, NAS Point Mugu, NAS Norfolk, provided TRACON air traffic control services to arriving and departing aircraft. As Radar Final Controller on USS America, NAS Point Mugu, NAS Norfolk and NAS Cubi Point, provided air traffic control services to arriving aircraft. Achieved FAA Ratings – Control Tower Operator, Radar Approach Controller, Radara Final Controller. Air Operations Supervisor. Developed and wrote training curriculum for advanced approach control and final control training program. Instructor for Santa Barbara Approach Control. Completed the following courses of air traffic control instruction while in military service: Radar Air Traffic Control (TRACON) Course Number NV-1704-0244, Carrier Air Traffic Control (CATC) Course Number NV-1704-0245 and Basic Air Traffic Control A School.

Education

Doctor of Law (J.D.), The Stetson University College of Law, 12/91 Bachelor of Arts (B.A.), Virginia Wesleyan University, 06/84 Associate of Arts (A.A.), Columbia, 06/82

Formal Training and Certification

Basic, Intermediate and Advanced Options, Mutual Fund Development and Distribution, Annuity Development and Distribution, Corporate Securities, Corporate Secretary, Single Stock Futures, Mutual Fund Share Class Distinctions, Internal Controls, Securities Law Enforcement, Customer Complaints, Developing a Securities Enforcement Case, Private Placements, Analyst Conflicts and Rules, Complex Financial Operations, Options Examination Techniques, Advanced CRD/Exam Qualification, Best Execution, Anti-Money Laundering, Misappropriation of Customer Funds, Financial Crimes Enforcement Network Training, Basic, Intermediate and Advanced Forensic Accounting., The SEC's Investigative and Enforcement Process, Fundamental Strategies in Securities Litigation, Financial Disclosure, Regulation FD, Regulation SP, Civil and Criminal Enforcement, Insider Trading, Broker-Dealer Regulation and Investigations. Media relations and interview techniques.

References:

Jeffrey M. Bloch, Director and Counsel, Pershing LLC
Thomas F. Guinan, Managing Director, Pershing LLC
John Walsh, Chief Counsel – U.S. Securities & Exchange Commission
Lori Richards, Director - U.S. Securities & Exchange Commission
Morgan Chong – Branch Chief – U.S. Securities & Exchange Commission
Michael Standard, Vice-President, EAI Surveillance Systems, Inc.
Ron Kovack, CEO Kovack Securities
Vince Robinson – Chairman, Commerce Holdings
Lee Giovannetti – Chairman, CSG Holdings
Joel R. Blumenschein – Chairman, Freedom Securities, FINRA Board of Governors
Jed Bandes – FINRA Board of Governors

Ken Norensberg – FINRA Board of Governors Abraham Mirman – Director of Investment Banking, ATB Richard Freuh – Chairman, GAH Holdings David Sobel – Chair, FINRA Small Firm Advisory Board Anthony Turbeville – CEO, Brookstone Securities Robert Hackel – CEO R.F. Lafferty &Co.

Public Speaking - Presentations

2001 - 16th Annual Spring Compliance Conference, April 16 - 19, Sheraton Bal Harbour, Miami, FL 1) A Look at Recent "Failure to Supervise" Cases: What Can Be Learned?

2001 - Branch Office Compliance Practices Conference, May 24 - 25, The Argent Hotel, San Francisco

- 1) Regulatory Concerns: The SEC and NASD Examination and Enforcement Focus
- 2) Additional Supervisory Considerations

2001 - 16th Annual Fall Compliance Conference, September 9 - 12, Arizona Biltmore, Phoenix

- 1) Guide to Drafting and Implementing Written Policies & Procedures
- 2) BD Compliance Panel

2001 - Suitability for Traditional & Online Brokers, October 4 - 5, The Roosevelt Hotel, New York City

- 1) Suitability in the Online Environment
- 2) Supervision of Suitability Determinations
- 3) Summary Remarks & Questions from the Floor

2002 - Branch Office Compliance Practices, June 18 - 19, The Phoenician, Scottsdale, AZ

- 1) Creating an Effective Supervisory System
- 2) Additional Supervisory Considerations

2002 - Suitability for Traditional & Online Brokers, June 20, The Phoenician, Scottsdale, AZ

- 1) Suitability in the Online Environment
- 2) Supervision of Suitability Determinations

2004 - 19th Annual Spring Compliance Conference, April 13 - 16, Hyatt Regency Coconut Point, Bonita Springs, FL

- 1) BD Pre-Conference Workshop: Breaking Down Compliance into Workable Parts (3 hours)
- 2) Broker/Dealer Internal Investigations
- 3) Q & A/Final Thoughts on How to Survive

2004 - 19th Annual Fall Compliance Conference, October 11 - 14, The Ritz-Carlton, New Orleans 1) Identifying and Managing BD Conflicts of Interest

2) Closing Q & A - Summary Comments & Recommendations

2005 - CEO Now Stands for Certifying Executive Officer, March 9 - 11, Hyatt Regency Grand Cypress, Orlando, FL

- 1) How to "Test" Processes
- 2) Questions for Panelists

2005 - 20th Annual Spring Compliance Conference, April 19 - 22, Hyatt Regency Scottsdale, AZ

- 1) Critical Elements of an Effective Supervisory Structure
- 2) Closing Q & A Summary Comments & Recommendations

2005 - Getting NASD New Rules 3012, 3013 and Amended 3010 Under Control, July 14, The Helmsley Hotel, New York City

- 1) NASD Rule 3012 (Supervisory Controls) (3.5 hours)
- 2) NASD Rule 3013 (CEO Cerification) (3.5 hours)

2005 - 20th Annual Fall Compliance Conference, October 18 - 21, Loews Miami Beach Hotel, Miami, FL

- 1) Dealing with NASD Rule 3012 How's It Going?
- 2) Q & A Summary Comments & Recommendations

2006 - 21st Annual Spring Compliance Conference, April 17 - 20, Westin Mission Hills Resort, Palm Springs, CA

- 1) How Do You Keep the Ball Rolling now that the First 3012, 3013 Reports have been Completed?
- 2) You're the CCO: Here are your Action Items

2006 - 21st Annual Fall Compliance Conference, October 3 - 6, Hyatt Regency Scottsdale, AZ

- 1) BD Pre-Conference Workshop Effective BD Supervision: A Supervisor's Role in Creating a Compliance Culture (3 hrs)
- 2) Adding New Products to Your Business Mix: A Good Idea or a Potential Pitfall?
- 3) You're the CCO: Here are your Action Items

2007 - 22nd Annual Spring Compliance Conference, April 15 - 18, Hyatt Regency Grand Cypress, Orlando, FL

- 1) BD Pre-Conference Workshop Creating an Effective Branch Office Inspection Program (3 hours)
- 2) You're the CCO: Here are Your Action Items

2007 – 22nd Annual Fall Compliance Conference, October 7-12, Hyatt Regency Newport Beach, CA

- 1) BD Pre-Conference Workshop Creating an effective business continuity plan.
- 2) Investment Advisory regulatory requirements.

2009 – 2nd Annual Hedge Fund Operations and Technology Conference, April 21, Bayards New York, NY

1) Best Practices for Managing Counterparty Risk for Hedge Funds

2009 - How to Launch a Hedge Fund Seminar, June 3, Bayards New York, NY

1) Compliance Issues

2009 - How to Launch a Hedge Fund Seminar, September 22, Bayards New York NY

1) Compliance Issues

2009 - NSCP National Membership Meeting, October 5-7, Marriot Downtown, Philadelphia, PA

- 1) IA Workshop: Your Compliance Empire
- 2) Balancing masters
- 3) Territories you have to cover
- 4) Staffing levels
- 5) Training your elite force

2009 - HedgeCo How to Start a Hedge Fund Panel, October 13, U.S. Trust Building New York, NY

1) Hedge Fund Compliance Post-Madoff

2009 - Jefferies Hedge Fund Regulation Seminar, October 15, New York, NY

1) Current rule changes, requirements, impact on the marketplace, time frames

2009 - NAIBD Fall Symposium, October 23, NYSE New York, NY

1) Technology Panel II – How to be Compliant Using Technology & Using Technology to Meet Compliance

2009 - FSX Financial Services Exchange Conference, October 29-31, Ritz Carlton Philadelphia, PA

- 1) Keynote Speaker: Broker Dealer Compliance Post-Madoff
- 2) Presenting Company Accounting & Compliance International

2009 - Hedge Fund Compliance & Risk: A Self-Help Guide, December 2, Bayards, New York, NY

- 1) Chairperson's Opening Remarks
- 2) Compliance Program: How to Build, Implement, Assess and Document

2009 – Auditing Broker Dealers in a Post-Madoff World, December 3, Essex House, New York, NY

- 1) Examining new Regulatory Requirements
- 2) Developing a Compliance Program
- 3) Navigating the Year-End Audit

2010 - FSX Financial Services Exchange Conference, January 28-30, Ritz Carlton Dallas, TX

1) Keynote Speaker: Broker Dealer Compliance

Professional Coursework (As Instructor)

- Straight Talk from the Securities Regulators
- Securities Trading Environment in the U.S.
- Going Global: International Securities Laws, Registration and Regulation
- Advertising and Marketing Securities over the Internet
- Personal Trading
- New Focus on Best Execution
- Registered Reps: Heightened Procedures for Pre-Hire Retention, Termination and Audit and Exam Protocols
- The SEC's Soft Dollar Release
- Internal Audit Programs for Broker-Dealers and Financial Institutions
- Mutual Fund Advertising
- What Investment Advisers Need to Know about ERISA Accounts
- The New Web CRD
- Investment Advisors and Broker Dealers: Business/Compliance Risk Assessment
- Financial Institution Internal Audit: 14 Years of Findings
- Creating an Effective Supervisory Structure
- Insurance Investment Products
- Contingency Planning: Y2K
- Regulatory Inspections: Current Focus and Deficiencies
- Who Gets Inspected and Why? What Triggers SEC Enforcement Referrals? What Steps does the SEC Take?
- Top 10 Litigation Avoidance Strategies for Investment Advisers.
- Top 10 Litigation Avoidance Strategies for Broker Dealers.
- Top 10 Litigation Avoidance Strategies for Mutual Funds
- Financial Institution Record keeping
- New Focus on Investment Suitability
- The Financial Professionals Identity: Who does what?
- The CPA as a Registered Representative.
- Special Issues for Investment Advisers who Manage Mutual Funds
- Legal Developments Impacting Insurance Design and Compliance
- Updating Compliance Infrastructure for Insurance Products
- Internet Marketing and Compliance for Insurance
- Insurance Marketing and Advertising
- Ensuring Insurance Marketplace Standards Association Standards
- Disciplinary Actions of the NASD
- Adhering to Illustration Guidelines for Insurance Products
- Suitability Issues Involving Broker-Dealer Sales of Insurance Products
- Developing and Implementing Electronic Compliance at Financial Institutions
- Developing Procedures, Policies & Documentation for Large Organizations
- Financial Product Internet Fraud
- Securities Law: The Securities Act of 1933 and the Exchange Act of 1934
- Examination Electronic Resources
- Registration of Broker-Dealers and Associated Persons
- Using Internet Research Tools in Examinations
- Pre-Examination Preparation
- Research Tools: Books on Screen
- Customer Account Selection in Examinations
- SEC Databases and Systems
- Interviewing Techniques

- Overview of DTCC-Clearance and Settlement of Equities
- Brokerage Mandatory Books and Records
- Broker-Dealer Accounting
- Suitability for Financial Products
- Regulation T and Margin Accounts
- Examination Documentation and Work papers
- Overview of Financial Responsibility Rules
- Broker-Dealer Net Capital
- Overview of Securities Investor Protection Corporation
- Customer Protection
- Securities Parking and Unauthorized Transactions
- Switching and Excessive Trading/Churning
- Professional Conduct
- Current and Future Securities Regulation Issues
- Single Stock Futures
- Suitability: Managing an Examination
- Supervision: Examination Techniques and Building a Case
- CDs: Advertising Issues, CD Sweeps, Exam Techniques
- Foreign Broker-Dealers
- Electronic Communication: On-line Suitability, E-Mail Supervision and Retention
- Internet Fraud
- Information Barriers
- Exchange Traded Funds
- Enforcement Cases
- Privacy: New Bank Rules, Reg. SP and Gramm Leach Bliley
- Best Execution
- Variable Insurance Products
- Money Laundering Part 1
- Money Laundering Part 2
- Micro-Cap Fraud and Cold Calling
- Variable Insurance Products
- Fixed Insurance Products
- Municipal Securities
- Unregistered Offerings and Distributions
- Broker-Dealer Supervision
- Market Manipulation
- Overview of Treasury Markets
- Derivatives
- Money Laundering
- Regulation SP and Privacy
- Obtaining Information from Clearing Corporations
- Prime Brokers
- Introduction to Market Risk
- Market Risk: Sound Practices
- Market Risk: Use of Models
- Market Risk: Limit Structures
- Market Risk: Stress Testing
- Key Elements of Market Control Structure
- Evolution of Control Practices at a Firm
- Market Risk: Document Requests
- Market Risk Portion of the IC Module
- Organization Structures and Risk Reporting
- Introduction to Risk Value

- Introduction to Operational Risk
- Front, Middle and Back Office Operations
- Broker-Dealer Funding and Liquidity
- Financial Institution Internal Audit
- Entrance and Exit Conferences
- Coordination with other Regulators
- Contingency Planning
- The Patriot Act
- Bank Secrecy Act
- Indicators of Suspicious Activity
- Correspondent Accounts
- SARs Suspicious Activity Reports
- Currency Transaction Reporting Requirements
- Treasury Interim Guidance
- Joint Examination Module
- NASD Rules 3230 and NYSE 382
- Services Provided by Clearing Firms
- What Clearing Firms Do
- Clearing Firm Reports
- Utililization of Clearing Firm Reports on Exams
- NASDs INSITE Examination Program
- Banking Regulation Part I
- Banking Overview and Important Banking Legislation
- How Federal Reserve Regulation Relates to SEC Regulation
- Banking Regulation Part 2
- Overview of Bank Examination
- Banking and the Patriot Act, Money Laundering
- Sharing Information with other Regulators
- Review of Options Basics
- Selecting Options Strategies
- Complex Net Capital Issues
- Valuing Illiquid Securities
- Haircuts on Complex Securities
- Using Sampling to Test Net Capital Compliance
- Intra-Day Net Capital
- Risk Based Net Capital
- Derivatives: Forwards, Futures and Swaps
- Derivatives: Options
- Credit Derivatives and Structured Securities
- Risk (Credit, Settlement, Interest Rate, Currency, Etc.)
- Derivatives: Hedging
- Derivative Risk Management Responsibilities
- Derivative Risk Management Limits, Internal Controls, Reporting
- Operation Risk and Contingency Planning/Disaster Recovery after 9/11
- Securities Futures
- Regulatory Concerns: The SEC and NASD Examination and Enforcement Focus
- Supervision of Branch Offices
- Creating an Effective Supervisory System
- Training Branch Managers to Effectively Supervise
- Supervision of Registered Representatives
- Broker-Dealer Compliance and Risk Management
- Supervision: New Books & Records Requirements for Branch Offices
- Supervision: Sale of Variable Bonus Insurance, Brokered CDs, Promissory Notes.

- Supervision: Electronic and Written Correspondence and Communication
- Creating and Audit Program for Branch Offices and Off-site Locations.
- SEC Doctrine: The Shingle Theory of Securities Fraud
- The Elements of NASD Rule 2310
- The Link Between Excessive Trading and Suitability
- Mutual Fund Suitability Issues
- Institutional Customer Suitability Obligations
- Suitability for Options Transactions
- Suitability for Speculative and Low Priced Securities
- NASD Rule 3110
- The Arbitration and Litigation Landscape
- The Applicability of Suitability Rules to Variable Insurance
- Online Suitability
- Supervision of Suitability Determinations
- Intermediate Options
- Single Stock Futures, What Examiners Need to Know
- Mutual Fund B Shares
- Internal Controls
- Customer Complaints
- Private Placements
- Developing and Enforcement Case
- New Analyst Rules
- Complex Financial Operations
- Options Examination Techniques
- Advanced CRD/Exam Qualifications
- Best Execution, Impact of the New Rules
- Advanced Money Laundering
- Misappropriation of Customer Funds
- SEC Inspection Findings: Where Advisors Fall Short
- BD Inspection Findings & Corresponding Solutions
- Managing BD Regulatory Investigations
- IA and Best Execution: Demonstrating Internal Controls
- BD Supervisory Practices: Branch Offices
- FORM ADV Disclosure
- New Issues in Communications with the Public
- A Primer on CFTC and NFA Oversight
- Building a Firm-Wide Compliance Program
- Introducing BD's and their Clearing Firms
- Wrap Fee/Managed Accounts
- Recordkeeping Focusing on the Problem Areas
- Key NASD/SEC Enforcement Cases
- Utilizing Technology to Streamline Compliance
- Understanding Custody Issues
- Assessing Compliance Programs Utilizing Internal Reviews
- Achieving Compliance with the SEC's New Proxy Rule
- Performance Advertising
- The SEC's New Books and Records Rule
- New AML Procedures and IA Requirements
- Implementation of a Customer Identification Program
- State Regulatory Issues
- Personal Securities Trading: Effective Oversight
- Anti-Money Laundering
- Advisory Referral Programs

Special Products: Variable Inst	surance, Mutual Funds	
Richard M. Nummi	Page 12 of 23	

Risk Management Related Coursework

Name of School	Location	Date From	Date to	Credit Hrs Earned	Course of Study
NRS	Various	9/99	Current		Speaker
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	Straight Talk from the Securities Regulators
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	Securities Trading Environment in the U.S.
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1.5	Going Global: International Securities Laws, Registration and Regulation
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	Advertising and Marketing Securities over the Internet
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	Personal Trading
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	New Focus on Best Execution
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	Registered Reps: Heightened Procedures for Pre-Hire Retention, Termination and Audit and Exam Protocols
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	The SEC's Soft Dollar Release
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	Internal Audit Programs for Broker-Dealers and Financial Institutions
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	Mutual Fund Advertising
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	What Investment Advisers Need to Know about ERISA Accounts
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	The New Web CRD
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	Investment Advisors and Broker Dealers: Business/Compliance Risk Assessment
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	Financial Institution Internal Audit: 14 Years of Findings
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	Creating an Effective Supervisory Structure
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	Insurance Investment Products
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	Contingency Planning: Y2K
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	Regulatory Inspections: Current Focus and Deficiencies
NRS Fall Securities Conference	Santa Fe, Nm.	9/99	9/99	1	Who Gets Inspected and Why? What Triggers SEC Enforcement Referrals? What Steps does the SEC Take?

Santa Fe, Nm.	9/99	9/99	1	Top 10 Litigation Avoidance Strategies for Investment Advisers.
Santa Fe, Nm.	9/99	9/99	1	Top 10 Litigation Avoidance Strategies for Broker Dealers.
Santa Fe, Nm.	9/99	9/99	1	Top 10 Litigation Avoidance Strategies for Mutual Funds
Santa Fe, Nm.	9/99	9/99	1	Financial Institution Record keeping
Santa Fe, Nm.	9/99	9/99	1	New Focus on Investment Suitability
Santa Fe, Nm.	9/99	9/99	1	The Financial Professionals Identity: Who does What?
Santa Fe, Nm.	9/99	9/99	1	The CPA as a Registered Representative.
Santa Fe, Nm.	9/99	9/99	1	Special Issues for Investment Advisers who Manage Mutual Funds
Tyson's Corner, Va.	4/00	4/00	2	Legal Developments Impacting Insurance Design and Compliance
Tyson's Corner, Va.	4/00	4/00	1	Updating Compliance Infrastructure for Insurance Products
Tyson's Corner, Va.	4/00	4/00	1.5	Internet Marketing and Compliance for Insurance
Tyson's Corner, Va.	4/00	4/00	2	Insurance Marketing and Advertising
Tyson's Corner, Va.	4/00	4/00	1	Ensuring Insurance Marketplace Standards Association Standards
Tyson's Corner, Va.	4/00	4/00	1.5	Disciplinary Actions of the NASD
Tyson's Corner, Va.	4/00	4/00	1	Adhering to Illustration Guidelines for Insurance Products
Tyson's Corner, Va.	4/00	4/00	1	Suitability Issues Involving Broker-Dealer Sales of Insurance Products
Tyson's Corner, Va.	4/00	4/00	1	Devewloping and Implementing Electronic Compliance at Financial Institutions
SEC HQ, Wash., D.C.	11/00	11/00	8	Developing Procedures, Policies & Documentation for Large Organizations
SEC HQ, Wash., D.C.	11/00	11/00	8	Financial Product Internet Fraud
SEC HQ, Wash., D.C.	01/01	02/01	4.5	Securities Law: The Securities Act of 1933 and the Exchange Act of 1934
	Santa Fe, Nm. Tyson's Corner, Va. Tyson's Corner, Va. Tyson's Corner, Va. Secorner, Va.	Santa Fe, Nm. 9/99 Tyson's Corner, Va. 4/00 Tyson's Corner, Va. 4/00 Tyson's Corner, Va. 4/00 Tyson's Corner, Va. 4/00 Tyson's Corner, Va. 4/00 Tyson's Corner, Va. 4/00 Tyson's Corner, Va. 4/00 SEC HQ, Wash., D.C. 11/00 SEC HQ, Wash., D.C. 11/00 SEC HQ, Wash., D.C. 11/00	Santa Fe, Nm. 9/99 9/99 Tyson's Corner, Va. 4/00 4/00 SEC HQ, Wash., D.C. 11/00 11/00 SEC HQ, Wash., D.C. 11/00 11/00 SEC HQ, Name of the proper of t	Santa Fe, Nm. 9/99 9/99 1 Tyson's Corner, Va. 4/00 4/00 2 Tyson's Corner, Va. 4/00 4/00 1 Tyson's Corner, Va. 4/00 4/00 2 Tyson's Corner, Va. 4/00 4/00 1 Syson's Corner, Va. 4/00 4/00 1 Tyson's Corner, Va. 4/00 4/00 1 Syson's Corner, Va. 4/00 4/00 1

Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	2.5	Examination Electronic Resources
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	1	Registration of Broker-Dealers and Associated Persons
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	1.25	Using Internet Research Tools in Examinations
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	2.5	Pre-Examination Preparation
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	1	Research Tools: Books on Screen
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	1	Customer Account Selection in Examinations
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	1.75	SEC Databases and Systems
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	3	Interviewing Techniques
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	1.25	Overview of DTCC-Clearance and Settlement of Equities
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	1	Brokerage Mandatory Books and Records
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	3	Broker-Dealer Accounting
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	1.5	Suitability for Financial Products
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	1	Regulation T and Margin Accounts
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	1	Examination Documentation and Workpapers
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	1	Overview of Financial Responsibility Rules
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	5	Broker-Dealer Net Capital
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	1.5	Overview of Securities Investor Protection Corporation
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	8.5	Customer Protection
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	1.5	Securities Parking and Unauthorized Transactions
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	2.5	Switching and Excessive Trading/Churning
Broker-Dealer Examinations I	SEC HQ, Wash., D.C.	01/01	02/01	1	Professional Conduct
SEC/NASD/NYSE/State Regulatory Training 2001	Ft. Lauderdale, Fl.	7/01	8/01	1	Current and Future Securities Regulation Issues
SEC/NASD/NYSE/State Regulatory Training 2001	Ft. Lauderdale, Fl.	7/01	8/01	1	Single Stock Futures
SEC/NASD/NYSE/State Regulatory Training 2001	Ft. Lauderdale, Fl.	7/01	8/01	1	Suitability: Managing an Examination

SEC/NASD/NYSE/State Regulatory Training 2001	Ft. Lauderdale, Fl.	7/01	8/01	1	Supervision: Examination Techniques and Building a Case
SEC/NASD/NYSE/State Regulatory Training 2001	Ft. Lauderdale, Fl.	7/01	8/01	1	CDs: Advertising Issues, CD Sweeps, Exam Techniques
SEC/NASD/NYSE/State Regulatory Training 2001	Ft. Lauderdale, Fl.	7/01	8/01	1	Foreign Broker-Dealers
SEC/NASD/NYSE/State Regulatory Training 2001	Ft. Lauderdale, Fl.	7/01	8/01	1	Electronic Communication: On-line Suitability, E-Mail Supervision and Retention
SEC/NASD/NYSE/State Regulatory Training 2001	Ft. Lauderdale, Fl.	7/01	8/01	1	Internet Fraud
SEC/NASD/NYSE/State Regulatory Training 2001	Ft. Lauderdale, Fl.	7/01	8/01	1	Information Barriers
SEC/NASD/NYSE/State Regulatory Training 2001	Ft. Lauderdale, Fl.	7/01	8/01	1	Exchange Traded Funds
SEC/NASD/NYSE/State Regulatory Training 2001	Ft. Lauderdale, Fl.	7/01	8/01	1	Enforcement Cases
SEC/NASD/NYSE/State Regulatory Training 2001	Ft. Lauderdale, Fl.	7/01	8/01	1	Privacy: New Bank Rules, Reg. SP and Gramm Leach Bliley
SEC/NASD/NYSE/State Regulatory Training 2001	Ft. Lauderdale, Fl.	7/01	8/01	1	Best Execution
SEC/NASD/NYSE/State Regulatory Training 2001	Ft. Lauderdale, Fl.	7/01	8/01	1	Variable Insurance Products
SEC/NASD/NYSE/State Regulatory Training 2001	Ft. Lauderdale, Fl.	7/01	8/01	1	Money Laundering Part 1
SEC/NASD/NYSE/State Regulatory Training 2001	Ft. Lauderdale, Fl.	7/01	8/01	1	Money Laundering Part 2
Broker-Dealer Examinations II	SEC HQ, Wash., D.C.	9/01	9/01	2	Micro-Cap Fraud and Cold Calling
Broker-Dealer Examinations II	SEC HQ, Wash., D.C.	9/01	9/01	2.5	Variable Insurance Products
Broker-Dealer Examinations II	SEC HQ, Wash., D.C.	9/01	9/01	1	Fixed Insurance Products
Broker-Dealer Examinations II	SEC HQ, Wash., D.C.	9/01	9/01	1.5	Municipal Securities
Broker-Dealer Examinations II	SEC HQ, Wash., D.C.	9/01	9/01	2	Unregistered Offerings and Distributions
Broker-Dealer Examinations II	SEC HQ, Wash., D.C.	9/01	9/01	3	Broker-Dealer Supervision
	•	•			

	ara no				1
Broker-Dealer Examinations II	SEC HQ, Wash., D.C.	9/01	9/01	2.5	Market Manipulation
Broker-Dealer Examinations II	SEC HQ, Wash., D.C.	9/01	9/01	2.5	Overview of Treasury Markets
Broker-Dealer Examinations II	SEC HQ, Wash., D.C.	9/01	9/01	3.5	Derivatives
Broker-Dealer Examinations II	SEC HQ, Wash., D.C.	9/01	9/01	1.5	Money Laundering
Broker-Dealer Examinations II	SEC HQ, Wash., D.C.	9/01	9/01	2	Regulation SP and Privacy
Broker-Dealer Examinations II	SEC HQ, Wash., D.C.	9/01	9/01	1.5	Obtaining Information from Clearing Corporations
Broker-Dealer Examinations II	SEC HQ, Wash., D.C.	9/01	9/01	2	Prime Brokers
Internal Controls/Risk Management	SEC HQ, Wash., D.C.	11/01	11/01	1	Introduction to Market Risk
Internal Controls/Risk Management	SEC HQ, Wash., D.C.	11/01	11/01	1	Market Risk: Sound Practices
Internal Controls/Risk Management	SEC HQ, Wash., D.C.	11/01	11/01	1	Market Risk: Use of Models
Internal Controls/Risk Management	SEC HQ, Wash., D.C.	11/01	11/01	1	Market Risk: Limit Structures
Internal Controls/Risk Management	SEC HQ, Wash., D.C.	11/01	11/01	1	Market Risk: Stress Testing
Internal Controls/Risk Management	SEC HQ, Wash., D.C.	11/01	11/01	1	Key Elements of Market Control Structure
Internal Controls/Risk Management	SEC HQ, Wash., D.C.	11/01	11/01	1	Evolution of Control Practices at a Firm
Internal Controls/Risk Management	SEC HQ, Wash., D.C.	11/01	11/01	1	Market Risk: Document Requests
Internal Controls/Risk Management	SEC HQ, Wash., D.C.	11/01	11/01	1	Market Risk Portion of the IC Module
Internal Controls/Risk Management	SEC HQ, Wash., D.C.	11/01	11/01	1	Organization Structures and Risk Reporting
Internal Controls/Risk Management	SEC HQ, Wash., D.C.	11/01	11/01	0.75	Introduction to Risk Value
Internal Controls/Risk Management	SEC HQ, Wash., D.C.	11/01	11/01	1	Introduction to Operational Risk
Internal Controls/Risk Management	SEC HQ, Wash., D.C.	11/01	11/01	1	Front, Middle and Back Office Operations
Internal Controls/Risk Management	SEC HQ, Wash., D.C.	11/01	11/01	1	Broker-Dealer Funding and Liquidity
Internal Controls/Risk Management	SEC HQ, Wash., D.C.	11/01	11/01	1	Financial Institution Internal Audit
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1	Entrance and Exit Conferences
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	0.5	Coordination with other Regulators
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	0.5	Contingency Planning

Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1.5	The Patriot Act
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1.5	Bank Secrecy Act
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1.5	Indicators of Suspicious Activity
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1.5	Correspondent Accounts
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1.5	SARs Suspicious Activity Reports
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1.5	Currency Transaction Reporting Rerquirements
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1.5	Treasury Interim Guidance
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1.5	Joint Examination Module
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1	NASD Rules 3230 and NYSE 382
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1	Services Provided by Clearing Firms
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1	What Clearing Firms Do
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1	Clearing Firm Reports
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1	Utililization of Clearing Firm Reports on Exams
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1	NASDs INSITE Examination Program
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1	Banking Regulation Part I
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1	Banking Overview and Important Banking Legislation
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1	How Federal Reserve Regulation Relates to SEC Regulation
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1	Banking Regulation Part 2
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1	Overview of Bank Examination
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1	Banking and the Patriot Act, Money Laundering
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1	Sharing Information with other Regulators
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1.5	Review of Options Basics
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1.5	Selecting Options Strategies
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	2	Complex Net Capital Issues
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	2	Valuing Illiquid Securities

Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	2	Haircuts on Complex Securitites
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	2	Using Sampling to Test Net Capital Compliance
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	2	Intra-Day Net Capital
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	2	Risk Based Net Capital
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	4	Derivatives: Forwards, Futures and Swaps
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	4	Derivatives: Options
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	4	Credit Derivatives and Structured Securities
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	4	Risk (Credit, Settlement, Interest Rate, Currency, Etc.)
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	4	Derivatives: Hedging
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	4	Derivative Risk Management Responsibilities
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	4	Derivative Risk Management Limits, Internal Controls, Reporting
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1.5	Operation Risk and Contingency Planning/Disaster Recovery after 9/11
Broker-Dealer Examinations III	SEC HQ, Wash., D.C.	3/02	3/02	1	Secuities Futures
Branch Office Compliance Practices	Scottsdale, Az.	6/02	6/02	2	Regulatory Concerns: The SEC and NASD Examination and Enforcement Focus
Branch Office Compliance Practices	Scottsdale, Az.	6/02	6/02	2	Supervision of Branch Offices
Branch Office Compliance Practices	Scottsdale, Az.	6/02	6/02	2	Creating an Effective Supervisory System
Branch Office Compliance Practices	Scottsdale, Az.	6/02	6/02	2	Training Branch Managers to Effectively Supervise
Branch Office Compliance Practices	Scottsdale, Az.	6/02	6/02	2	Supervision of Registered Representatives
Branch Office Compliance Practices	Scottsdale, Az.	6/02	6/02	2	Broker-Dealer Compliance and Risk Management
Branch Office Compliance Practices	Scottsdale, Az.	6/02	6/02	2	Supervision: New Books & Records Requirements for Branch Offices
Branch Office Compliance Practices	Scottsdale, Az.	6/02	6/02	2	Supervision: Sale of Variable Bonus Insurance, Brokered CDs, Prommissory Notes.
Branch Office Compliance Practices	Scottsdale, Az.	6/02	6/02	2	Supervision: Electronic and Written Correspondence and Communication
Branch Office Compliance Practices	Scottsdale, Az.	6/02	6/02	2	Creating and Audit Program for Branch Offices and Off-site Locations.

Suitability for Traditional and Online Broker-Dealers	Phoenix, Az.	6/02	6/02	2	SEC Doctrine: The Shingle Theory of Securities Fraud
Suitability for Traditional and Online Broker-Dealers	Phoenix, Az.	6/02	6/02	2	The Elements of NASD Rule 2310
Suitability for Traditional and Online Broker-Dealers	Phoenix, Az.	6/02	6/02	2	The Link Between Excessive Trading and Suitability
Suitability for Traditional and Online Broker-Dealers	Phoenix, Az.	6/02	6/02	2	Mutual Fund Suitability Issues
Suitability for Traditional and Online Broker-Dealers	Phoenix, Az.	6/02	6/02	2	Institutional Customer Suitability Obligations
Suitability for Traditional and Online Broker-Dealers	Phoenix, Az.	6/02	6/02	2	Suitability for Options Transactions
Suitability for Traditional and Online Broker-Dealers	Phoenix, Az.	6/02	6/02	2	Suitability for Speculative and Low Priced Securities
Suitability for Traditional and Online Broker-Dealers	Phoenix, Az.	6/02	6/02	2	NASD Rule 3110
Suitability for Traditional and Online Broker-Dealers	Phoenix, Az.	6/02	6/02	2	The Arbitration and Litigation Landscape
Suitability for Traditional and Online Broker-Dealers	Phoenix, Az.	6/02	6/02	2	The Applicability of Suitability Rules to Variable Insurance
Suitability for Traditional and Online Broker-Dealers	Phoenix, Az.	6/02	6/02	2	Online Suitability
Suitability for Traditional and Online Broker-Dealers	Phoenix, Az.	6/02	6/02	2	Supervision of Suitability Determinations
Joint Regulatory Training	SEC HQ, Wash., D.C.	8/02	8/02	1.5	Intermediate Options
SEC/NASD/NYSE/State Regulatory Training 2002	SEC HQ, Wash., D.C.	8/02	8/02	0.5	Single Stock Futures, What Examiners Need to Know
SEC/NASD/NYSE/State Regulatory Training 2002	SEC HQ, Wash., D.C.	8/02	8/02	1	Mutual Fund B Shares
SEC/NASD/NYSE/State Regulatory Training 2002	SEC HQ, Wash., D.C.	8/02	8/02	2.5	Internal Controls
SEC/NASD/NYSE/State Regulatory Training 2002	SEC HQ, Wash., D.C.	8/02	8/02	2	Customer Complaints

SEC HQ, Wash., D.C.	8/02	8/02	1	Priovate Placements
SEC HQ, Wash., D.C.	8/02	8/02	1	Developing and Enforcement Case
SEC HQ, Wash., D.C.	8/02	8/02	1	New Analyst Rules
SEC HQ, Wash., D.C.	8/02	8/02	2.5	Complex Financial Operations
SEC HQ, Wash., D.C.	8/02	8/02	1.5	Options Examination Techniques
SEC HQ, Wash., D.C.	8/02	8/02	1.5	Advanced CRD/Exam Qualifications
SEC HQ, Wash., D.C.	8/02	8/02	1.5	Best Execution, Impact of the New Rules
SEC HQ, Wash., D.C.	8/02	8/02	1.5	Advanced Money Laundering
SEC HQ, Wash., D.C.	8/02	8/02	1	Misappropriation of Customer Funds
Charleston, SC	8/03	8/03	1	SEC Inspection Findings: Where Advisors Fall Short
Charleston, SC	8/03	8/03	1	BD Inspection Findings & Corresponding Solutions
Charleston, SC	8/03	8/03	1	Managing BD Regulatory Investigations
Charleston, SC	8/03	8/03	1	IA and Best Execution: Demonstrating Internal Controls
Charleston, SC	8/03	8/03	1	BD Supervisory Practices: Branch Offices
Charleston, SC	8/03	8/03	1	FORM ADV Disclosure
Charleston, SC	8/03	8/03	1	New Issues in Communications with the Public
Charleston, SC	8/03	8/03	1	A Primer on CFTC and NFA Oversight
	Wash., D.C. SEC HQ, Wash., D.C. Charleston, SC Charleston, SC	Wash., D.C. 8/02 SEC HQ, Wash., D.C. 8/03 Charleston, SC 8/03	Wash., D.C. 8/02 8/02 SEC HQ, Wash., D.C. 8/02 8/02 Charleston, SC 8/03 8/03 Charleston, SC 8/03 8/03	Wash., D.C. 8/02 8/02 1 SEC HQ, Wash., D.C. 8/02 8/02 1 SEC HQ, Wash., D.C. 8/02 8/02 1 SEC HQ, Wash., D.C. 8/02 8/02 2.5 SEC HQ, Wash., D.C. 8/02 8/02 1.5 SEC HQ, Wash., D.C. 8/02 8/02 1.5 SEC HQ, Wash., D.C. 8/02 8/02 1.5 SEC HQ, Wash., D.C. 8/02 8/02 1 Charleston, SC 8/03 8/03 <

NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	Building a Firm-Wide Compliance Program
NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	Introducing BD's and their Clearing Firms
NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	Wrap Fee/Managed Accounts
NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	Recordkeeping – Focusing on the Problem Areas
NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	Key NASD/SEC Enforcement Cases
NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	Utilizing Technology to Streamline Compliance
NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	Understanding Custody Issues
NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	Assessing Compliance Programs Utilizing Internal Reviews
NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	Achieving Compliance with the SEC's New Proxy Rule
NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	Performance Advertising
NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	The SEC's New Books and Records Rule
NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	New AML Procedures and IA Requirements
NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	Implementation of a Customer Identification Program
NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	State Regulatory Issues
NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	Personal Securities Trading: Effective Oversight
NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	Anti-Money Laundering
NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	Advisory Referral Programs

NRS Fall Compliance Conference	Charleston, SC	8/03	8/03	1	Special Products: Variable Insurance, Mutual Funds
--------------------------------	-------------------	------	------	---	--

PUBLICATIONS AND ARTICLES

No Excuse for Late Documents to FINRA – Wall Street Journal

http://compliancex.typepad.com/compliancex/2010/01/compliance-watch-staffing-no-excuse-for-late-documents-to-finra.html