

Investment Adviser/Broker Dealer Joint Examination Information Request List

Examination Period

Information is requested for the period January 1, 2008 through January 31, 2009 (the "Examination Period").

Organizing the Information to be Provided

In order to efficiently process the material assembled for the staff's review, please group the information so that it corresponds to the item number in the request list. If information provided is responsive to more than one request item, you may provide it only once and refer to it when responding to the other request item numbers. If any request item does not apply to your business, please indicate "N/A" (not applicable).

Information to be Provided

To the maximum extent possible, provide the documents below in electronic format. If not maintained electronically, the staff's preference is to receive the documents in a readable scanned format (OCR).

I. General Information

- A. Broker Dealer's and Adviser's organization charts. For the Adviser's organizational chart show ownership percentages of the Adviser and control persons and a schedule or chart of all affiliated entities. Include all entities that are commonly controlled by, or under common control with, Adviser.
- B. Names of any of the both the Adviser's and Broker-Dealer's officers and/or directors who resigned during the examination period and information regarding the reason for their departure.
- C. Names of employees who were disciplined and/or terminated during the examination period and information regarding the reason for the action.
- D. Any threatened, pending and settled litigation or arbitration involving the Adviser or any "supervised person" (if it relates to the individual's association with the adviser or a securities-related matter) including a description of the allegations, the status, and a brief description of any "out of court" or informal settlement. Note that "supervised person" is any partner, officer, director (or other person occupying a similar status or performing similar functions), or employee of an investment adviser, or other person who provides investment advice on behalf of the investment adviser and is subject to the supervision and control of the investment adviser (defined in Section 202(a)(25) of the Advisers Act). If none, please provide a written statement to that effect.

- E. Form ADV Part II furnished to clients during the examination period and any disclosure document used in conjunction with or in lieu of Part II.
- F. The names, addresses, and contact information of all service providers (both affiliated and unaffiliated providers). Also, identify the services they perform, provide information about the due diligence process to initially evaluate and monitor thereafter the work provided, and address how potential conflicts of interest and information flow issues are addressed.
- G. Breakdown of the Broker-Dealer's revenue by product area for the 12 month period ending December 31, 2008.
- H. Adviser's balance sheet, income statement, and cash flow statement as of the end of its most recent fiscal year.
- I. Total number of customer/client accounts, total assets, and percentage breakdown for each type of account (i.e., brokerage, advisory, margin, omnibus, etc.) as of December 31, 2008. Also, for advisory accounts, provide a percentage breakdown for each type of account (i.e., institutional, individual, private investment company, and registered investment company, etc.) as of December 31, 2008.

II. Compliance Program, Risk Management and Internal Controls

The staff requests the information listed below to assist in evaluating Registrant's compliance program with respect to its procedures for safekeeping clients' assets. If Registrant does not have information that is responsive, please state "none."

A. Compliance Policies and Procedures and Testing

The staff's review of Registrant's compliance program will focus on its safeguards surrounding its custodial arrangements and its verification procedures that support the existence of client assets.

1. The current inventory of risks and conflicts of interest.
2. Compliance policies and procedures that were in effect during the examination relating to clearance and settlement, receipt or disbursement of customer funds, client statements and custody used to mitigate and manage the compliance risks.
3. Information relating to the firm's compliance testing, including any compliance reviews, quality control analyses, surveillance, and/or forensic or transactional tests performed by the firm. This information should include any significant findings, both positive and negative, of such testing and any information about corrective or remedial actions taken regarding these findings. Staff will review these documents on-site.

B. Annual and/or Interim Reviews

Documentation maintained regarding any reviews conducted of the Registrant's compliance policies and procedures, including any annual and/or interim reports.

C. Customer Complaints

Have available for review all customer complaints relating to clearance and settlement, receipt or disbursement of customer funds, client statements or custody received for the Examination Period.