

SECURITIES SUPPLEMENT

Risk Management Procedures

1. **Yes** **No** Does the Applicant or any firm member conduct what is commonly referred to as a “due diligence investigation” when representing clients as to the offering or sale of securities?
2. **Yes** **No** During the past five (5) years has the Applicant been involved in or have knowledge of any facts that would indicate that the Applicant or any firm member may be included in an investigation or administrative action by the SEC or any state securities regulator or authority?

If yes, provide details on a separate addendum.
3. **Yes** **No** Has the Applicant or any firm member prepared any portion of a prospectus, offering memorandum or disclosure statement (including a tax opinion) which is required by law in connection with the issuance, sale or transfer of a security?
4. **Yes** **No** Has the Applicant or any firm member had any involvement in the direct sale to an individual purchaser of any security for which a prospectus, offering memorandum or disclosure statement is required by law?
5. **Yes** **No** Has the Applicant or any firm member accepted any type of equity interest in a securities client in lieu of attorney’s fees?

If yes, provide a separate addendum including the following information:
 - a. What are the circumstances that would permit the Applicant or any firm member to accept an equity interest in lieu of attorney’s fees?
 - b. What is the approval process to accept an equity interest in lieu of attorney’s fees?
6. Has the Applicant or any firm member provided professional legal services to securities clients in which any firm member or any immediate family member:
 - a. **Yes** **No** Serves or served as an officer, director, trustee, employee or partner of such client?
 - b. **Yes** **No** Owns or owned an equity interest or financial interest in such client?