This disclosure provides information about the business practices, compensation and conflicts of interest related to the brokerage business of Cibest Capital Securities, LLC (referred to as "we," "us," or "CCS"). Additional information about CCS and its financial professionals is available on FINRA's website at http://brokercheck.finra.org.

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### **ITEM 1 INTRODUCTION**

CCS is a broker-dealer registered with the Securities and Exchange Commission (SEC) and member of the Financial Industry Regulatory Authority (FINRA). As a broker-dealer, CCS transacts business in various types of securities, including mutual funds, exchange-traded funds (ETFs), stocks, bonds, options, structured products, and other investment products.

CCS maintains a network of individuals, referred to as "financial professionals", who offer brokerage services, investment advisory services, or both, depending on their licenses. Some of CCS's financial professionals are investment adviser representatives (IARs) of Cibest Capital Advisory Services, LLC ("CCA") or a non-affiliated third-party investment adviser. Some "financial professionals" are also register with other affiliated financial entities of CCS. CCS sometimes refers to these specific financial professionals as "financial advisors" or "advisors." CCS's financial professionals are primarily employed individuals.

Although most financial professionals offer both brokerage and investment advisory services through CCS and CCA respectively, some only offer brokerage services and others only offer investment advisory services. When you are discussing services with a financial professional, you should ask in what capacity the financial professional is acting or will be acting – as a broker-dealer registered representative and/or an IAR – when providing services to you. This disclosure discusses important information regarding financial professionals who act as registered representatives of CCS's broker-dealer. For more information about CCS and the services financial professionals provide when they act as IARs, please see Cibest Capital Advisory Services LLC's Form ADV disclosure brochures available at <a href="www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> or contact that investment advisor for a copy of its Form ADV. For additional information on which type of investment

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account is right for you, please see CCS's Form CRS (Customer Relationship Summary) that will be available upon request to your financial professional.

When you enter in a relationship with CCS, you will be opening a brokerage account. This means that you will be able to execute securities transactions in your account. As a broker or dealer, all recommendations CCS provides regarding your brokerage account will be made in a broker-dealer capacity and not an investment advisory capacity. CCS does not offer account monitoring services. However, from time to time, we voluntarily review clients' accounts to determine whether our recommendation continues to be in clients' best interest.

While we will take reasonable care in developing and making recommendations to you, securities products involve risk, are not guaranteed, and you may lose money. There is no guarantee that you will meet your investment goals, or that our recommended investment strategy will perform as anticipated. Please note that past performance is no guarantee of future results. Please consult any available offering documents for any security we recommend for a discussion of risks associated with the product and associated fees. We can make these documents available to you.

You should be aware that even when we provide recommendations that we believe are in your best interest there will be instances where we may have a conflict of interest in regard to the security, strategy or product. We will do our best effort to identify any material conflict of interest with respect to any recommendation. When we identify a conflict of interest, we will do our best to eliminate the conflict. If we are not able to eliminate the conflict, we will place mitigating controls to minimize the impact, and we will disclose to you the conflict of interest. We have disclosed below those conflicts of interest that are material and that you should be aware of when making any investment decision.

In the next sections, you will be able to obtain more information on our general obligations, products and services, compensation practices and **conflict of interests**. Please read them carefully and should have any comments or questions, please contact your financial professional or us directly at <a href="mailto:compliance@cibestcapital.us">compliance@cibestcapital.us</a>

Like all financial services providers, CCS and its financial professionals have **conflicts of interest**. CCS and its financial professionals are compensated indirectly from customers and the investments made by customers. When customers pay us, we typically get paid an upfront commission or sales load at the time of the transaction and in some cases a deferred sales charge. If we are paid an upfront commission, it means that we are paid more the more transactions a customer makes. When we are paid indirectly from the investments made by customers, we receive ongoing compensation, typically called a "trail" payment, for as long as a customer holds an investment. In addition, we receive compensation from the sponsors of some of the investment products that customers purchase through us. The amount we receive varies

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depending on the particular type of investment a customer makes. The compensation described in this disclosure represents the maximum gain or profit we receive on an investment, before subtraction of our expenses.

Please also note that not all of the conflicts described in this disclosure apply to a particular financial professional, his/her services or all the products we sell. The types and amounts of compensation we receive change over time. You should ask your financial professional if you have any questions about compensation, costs, fees, or conflicts of interest.

### ITEM 2 COMMISSIONS, FEES AND OTHER TYPES OF SALES COMPENSATION

### **Commissions and Sales Charges**

CCS receives upfront commissions when it executes transactions that result in the purchase or sale of a security. A commission, which also may be called a sales load, sales charge or placement fee, is typically paid at the time of the transaction and can reduce the amount available to invest or can be charged directly against an investment. Commissions are often based on the amount of assets invested. CCS receives the sales charge or commission and shares it with your financial professional. In some cases, a portion of the sales charge or commission is retained by the investment's sponsor. Commissions vary from product to product, which creates an incentive to sell a higher commission security rather than a lower commission security. The maximum and typical commissions for common investment products are listed in Schedule II. For more information about other commissions that apply to a particular transaction, please refer to the applicable investment's prospectus or other offering document.

### Markups and Markdowns – Principal or Dealer Transactions

When CCS buys from or sells a security to you in a principal capacity, CCS buys or sells the security directly to or from you, rather than acting as your agent to buy or sell the security from a third party. These transactions are also known as "dealer transactions." In these circumstances, if we sell a security at a price higher than what we paid for it, we will earn a markup. Conversely, if we buy a security from you at a price lower than what we sell it for, we will earn a markdown. Transactions in bonds and other fixed-income securities such as structured products often occur as dealer transactions. Please refer to Schedule II for more information on Allowable Mark ups and Mark downs.

On rare occasions, a markup/markdown may exceed 3% on a deeply discounted security. In many cases, the actual markup/markdown percentage is lower based on factors such as quantity, price, type of security, rating, maturity, etc.

#### **Direct Fees and Charges**

If you hold an account at CCS, CCS charges miscellaneous fees directly to your account such as fees for transaction processing, account transfers, and retirement account maintenance. For direct fees that apply

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per transaction, CCS receives more fees the more transactions that result from a financial professional's recommendation. These direct fees and charges are set out in Schedule I of the Brokerage Account Fees & Charges and are not shared with financial professionals.

#### ITEM 3 THIRD PARTY COMPENSATION

CCS and financial professionals receive compensation from investment product sponsors and other third parties in connection with investments that CCS customers make in securities such as mutual funds, and alternative investments. Some types of third-party compensation are received by CCS and shared with financial professionals, and other types are retained only by CCS.

## Third Party Compensation Shared by CCS and Financial Professionals Trail Compensation

CCS and its financial professionals receive ongoing compensation from certain investment products such as mutual funds, and alternative investments. This compensation (commonly known as trails or Rule 12b-1 fees or management fees) is typically paid from the assets of the investment product under a distribution or servicing arrangement with the investment sponsor and is calculated as an annual percentage of assets invested by CCS customers. The more assets you invest in the product, the more fees will be paid to CCS. Therefore, we have an incentive to encourage you to increase the size of your investment. The amount of trails received varies from product to product. This creates an incentive to recommend a product that pays a higher trail rather than a lower trail. We also have an incentive to recommend a product that pays trails (regardless of amount) rather than products that do not pay trails. For more information about trail compensation received with respect to a particular investment, please refer to the prospectus or offering document for the investment.

- Mutual Funds: The ongoing payment depends on the class of shares but is typically between 0.25% and 1.5% of assets annually.
- Alternative Investments: For alternative investment products, such as private funds, trail payments may be as high as 1.5% on an annual basis.

#### **Non-Cash Compensation**

CCS, CCS employees and financial professionals may receive non-cash compensation from investment sponsors that is not in connection with any particular customer or investment. Compensation includes such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings, customer workshops or events, or marketing or advertising initiatives, including services for identifying prospective customers. Investment sponsors may also pay, or reimburse CCS and/or its financial professionals, for the costs associated with education or training events that may be attended by CCS employees and financial professionals and for CCS sponsored conferences and events.

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### Third Party Compensation Retained by CCS Cash Sweep and Non-Sweep Money Market Mutual Funds

If a customer holds an account with CCS, CCS offers a service to sweep cash held within money market funds. Under its agreement with each fund in which CCS deposits customer cash, CCS receives a fee from the fund equal to a percentage of the average daily deposit balance in the money market fund.

For accounts held at CCS uninvested cash balances are automatically invested in a money market sweep fund. CCS receives compensation (e.g. trailer or 12b1 fees from sweep and non-sweep money market funds) from the sponsors to these funds, ranging between -0.01% and 0.45% of the assets invested in cash sweep and non-sweep money market funds and may change at any time with market conditions. The client and/or the registered representative instructs desired investments in cash sweep and non-sweep products.

Depending on interest rates and other market factors, the yields on money market sweep fund have been, and may continue in the future to be, lower than the aggregate fees and expenses received by CCS for a customer's participation in the cash sweep programs. This may result in a customer experiencing a negative overall investment return with respect to cash balances in the cash sweep programs. Interest rates under money market funds may be lower than the interest rates available if customers make deposits directly with a bank or other depository institution outside of CCS's brokerage platform or invests in some other money market fund or other cash equivalent. Customers should compare the terms, interest rates, required minimum amounts and other features with other types of accounts and investments for cash. Unlike other types of mutual funds available on CCS's platform, CCS makes available Non-Sweep and Sweep Money Market Funds from only a limited number of mutual fund sponsors. Because of the limited number of Non-Sweep and Sweep Money Market Funds available on the platform and the fees paid by those funds, other money market mutual funds not available through CCS's brokerage platform are likely to have higher returns than the Non-Sweep and Sweep Money Market Funds.

#### ITEM 4 PRODUCT COSTS AND RELATED CONFLICTS

Financial professionals provide recommendations with respect to a broad range of investment products, including stocks, bonds, ETFs, mutual funds, and alternative investments. Each type of investment product carries unique risks, and many investment products charge fees and costs that are separate from and in addition to the commissions and fees that CCS and financial professionals receive. You can learn more about these risks, fees and costs charged by an investment product by reviewing the investment product's prospectus, offering memorandum, or other disclosure documents.

Set out below is the typical range of expenses of the various investment products we sell. In most cases, these expenses are in addition to the commissions and fees that CCS receives for its brokerage services.

☐ *ETFs:* The expense ratios range from 0.05% to 1.0%, with an average expense ratio of around 0.44%.

- Mutual Funds: Expense ratios can vary based on the type of mutual fund purchased. The average expense ratio for actively managed funds is 0.5% to 1.0%, for passive index mutual funds the average is 0.2%.
- Alternative Investments. The typical range of annual expenses, excluding any commissions or dealer manager fees, is 0.80% to 6.00% which may include management fees, acquisition fees, disposition fees, performance participation fees, organization and offering fees, acquired fund fees and expenses, or interest payments on borrowed funds.

#### □ Share Class and Fund Selection

CCS offers various share classes of mutual funds. As an example, certain mutual fund share classes, often referred to as Class A shares, charge a sales charge and an ongoing trail. For other mutual fund share classes, often titled Class C shares, there is upfront sale charge paid, as well as an ongoing trail payment and a contingent deferred sales charge to the investor if there is a redemption within a certain period of time after purchase. Depending on the length of the holding period for the mutual fund, and other factors, one share class may be less expensive to the investor than another, and CCS and the financial professional may earn more or less in compensation for one share class than another. Because of their characteristics and sales load structure, mutual funds generally are longer term investments. Frequent purchases and sales of mutual funds can result in significant sales charges unless the transactions are limited to exchanges among mutual funds offered by a sponsor that permits exchanges without additional sales charges. CCS maintains policies and procedures that are designed to detect and prevent excessive mutual fund switching, but you should monitor your account and discuss with your financial professional any frequent mutual fund purchases and sales.

Some share classes or funds we offer do not charge or pay to us an upfront sales charge and pay us ongoing trails of 0.25% or less annually ("no- load funds"). CCS makes no-load funds available only to certain customers. We may be compensated in other ways by sponsors of no-load funds, such as through revenue sharing payments. Because of the limited compensation from no-load funds, we have an incentive to limit the availability of no-load funds we offer and to recommend you invest in funds that impose sales charges and trails.

CCS also offers various mutual funds and ETFs, some of which have similar or identical investment strategies but differing fee structures. For example, a mutual fund that is designed to track an index of securities, such as the S&P 500 Index, may have higher or different types of fees than an ETF that is designed to track the same index. Whether a fund or ETF is more expensive than another fund or ETF with a similar or identical investment strategy may depend on factors such as length of holding, size of the initial investment and other factors. CCS and a financial professional may earn more compensation for one fund or ETF than another, giving CCS and the financial professional an incentive to recommend the product that pays more compensation to us.

**Proprietary Products:** CCS, CCA and its registered representatives offer products sponsored and/or managed by Grupo Cibest or related/affiliated entities under common control. In such instances, CCS, CCA, their associated persons and affiliated entity(ies) earn compensation for all transactions directly and

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indirectly. The compensation received is a conflict of interest and can potentially incentivize us to promote proprietary products to you over other ones available.

Clients will pay commissions to CCS for executing the purchase/sale of proprietary products. Advisory clients that have an account through CCA will also be assessed a management fee based on all assets under management, including these proprietary funds.

### ITEM 5 CUSTOMER REFERRALS, OTHER COMPENSATION, AND OTHER CONFLICTS

### **Payment for Referrals**

CCS offers programs where CCS pays third parties and/or professionals, such as attorneys or accountants, for referrals. In one such program, CCS pays such professionals for referrals exclusively to its advisory business, and customers must acknowledge the referral payment to the professional. In another program, the professionals become registered as representatives of CCS and share in brokerage commissions and advisory fees in connection with the referral.

## Margin & Loan Advance

CCS offers customers the ability to purchase securities on credit, also known as margin purchases. When a customer purchases securities on margin, CCS extends a line of credit to the customer and charges interest on the margin balance. CCS has a financial incentive to encourage margin borrowing because CCS earns compensation in the form of interest, transaction charges and other fees on investments made with borrowed amounts. That financial incentive creates a conflict of interest so far as CCS and financial professionals benefit from your decision to borrow and incur the various fees and interest described above. If contemplating use of margin, please consult the CCS Margin Agreement and related disclosures for additional details.

#### **Error Correction**

If a customer holds an account at CCS and a trade error caused by CCS occurs in the account, CCS will cancel the trade and remove the resulting monetary loss for the customer from the account. If a trade correction is required as a result of a customer (e.g., if a customer does not make full payment for purchases or fails to deliver negotiable securities for liquidations before trade settlement), CCS will cancel the trade and any resulting monetary loss will be borne by the customer. In the case of a trade that requires a correction and that resulted in a monetary gain to the customer, such gain may be removed from the account and may result in a financial benefit to CCS.

#### **Limitations on Investment Recommendations**

CCS and financial professionals offer and recommend investment products only from investment sponsors with which CCS has entered into selling and distribution agreements. Other firms may offer products and services not available through CCS, or the same or similar investment products and services at lower cost.

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In addition, CCS may only offer certain products in a brokerage account, even though there is a version of the product that may be offered at a lower cost through an advisory account, and vice versa.

The scope of products and services offered by certain financial professionals may also be more limited than what is available through other financial professionals. A financial professional's ability to offer individual products and services depends on his/her licensing, training or branch office policy restrictions. For example, a financial professional maintaining a Series 6, Series 63 and Life Insurance Agent license is limited to providing investment company securities, such as mutual funds and UITs and variable annuity contracts. A financial professional maintaining a Series 7, Series 63 and Life Insurance Agent license can provide solutions including all securities available for sale by a Series 6 representative as well as individual stocks, bonds, and alternative investments, among others. As another example, a financial professional may only be licensed to provide brokerage services, and not advisory services, or vice versa. To provide investment advisory services, a financial professional is often required to be registered as an IAR (Investment Advisor Representative) with the state in which he/she has a place of business.

You should ask your financial professional about the securities or services he/she is licensed or qualified to sell, and his/her ability to service investments that you transfer to CCS from another firm. You should also review the licenses held by your financial professional by visiting the FINRA Broker Check system at <a href="http://brokercheck.finra.org">http://brokercheck.finra.org</a>.

### ITEM 6 FINANCIAL PROFESSIONAL COMPENSATION, FEES AND RELATED CONFLICTS

CCS generally compensates financial professionals pursuant to an employment agreement. Described below are the compensation and other benefits that employed financial professionals receive from CCS.

### **Cash Compensation**

CCS typically pays a financial professional a salary and a variable compensation based partially on a percentage of the revenue he/she generates from sales of products and services; however, other factors are considered in the variable compensation such as customer service, compliance, and overall firm performance, all of which have equal weight. When compensation is based partially on the level of production or assets, the financial professional has a financial incentive to meet those production or asset levels. CCS and branch managers have an obligation to supervise financial professionals and may decide to terminate a financial professional's association with CCS based on performance, a disciplinary event or other factors. The amount of revenue a financial professional generates creates a conflict of interest when considering whether to terminate a financial professional.

### **Other Benefits**

Financial professionals are eligible to receive other benefits based on the revenue he/she generates from sales of products and services. These benefits present a conflict of interest because the financial professional has an incentive to remain a registered representative of CCS in order to maintain these benefits. These benefits include eligibility for practice management support and enhanced service support

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levels that confer a variety of benefits, conferences (e.g., for education, networking, training, and personal and professional development), and other non-cash compensation.

### **Financial Professional's Outside Business Activities**

Financial professionals may have business activities that are aside and in addition to their securities brokerage responsibilities within CCS, these are called "Outside Business Activities" or "OBA's". These OBA's are required to be approved by CCS and there may be instances where the OBA from your financial professional is with an affiliate of CCS. In other instances, they may not be with an affiliate. You should be aware that due to the nature of some OBA's there may be times that your financial professional's OBA may present a conflict with their recommendations, solicitation of products, solicitation of accounts and other services we may be providing you. Under US securities rules and regulations, financial professionals must disclose and make public all OBA's, including the nature and time dedicated to the business. Because each scenario will be unique to you and your relationship with your financial professional, we encourage you to review his/her FINRA BrokerCheck Report and find additional information about your financial professional's outside business activities on <a href="https://brokercheck.finra.org">https://brokercheck.finra.org</a>. You will gain access to all material disclosures relevant to your financial professional, including any OBA they may have.

A financial professional may earn compensation, benefits and non-cash compensation through the outside business activity and may have an incentive to recommend you purchase products away from CCS. If you engage with a financial professional for services separate from CCS, you may wish to discuss with him/her any questions you have about the compensation he/she receives from the engagement.

## **Compensation for Other Services**

CCS and financial professionals can offer various types of advisory and brokerage programs, platforms and services, and earn differing types and amounts of compensation depending on the type of service, program or platform in which you participate. This variation in compensation can incentivize a financial professional to recommend services, programs or platforms that generate more compensation for CCS and the financial professional than others. For example, if you expect to trade securities frequently in your account, a brokerage account in which you pay a commission for each transaction may generate more compensation for your financial professional than an advisory account that generates compensation in the form of investment advisory fees.

### **ITEM 7 OTHER FINANCIAL INDUSTRY AFFILIATIONS**

CCS is affiliated with other financial services companies. The affiliated entities include:

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Cibest Capital Advisory Services LLC ("CCA") is an affiliated investment adviser registered with the Securities and Exchange Commission ("SEC"). CCA can recommend the services of CCS. Because of the affiliation, CCA has an incentive to recommend CCS over another broker dealer. CCA may also utilize research and reporting services of CCS.

Valores Bancolombia S.A. ("Valores") is an affiliated broker dealer and investment adviser registered with the Colombian Superintendency of Finance. Valores can recommend the services of CCS. Because of the affiliation and Sub-Clearing agreement signed between CCS and Valores. Valores has an incentive to recommend CCS over another broker dealer. CCS may also utilize research and reporting services of Valores.

**Bancolombia S.A.** ("Bancolombia") is an affiliated bank registered with the Colombian Superintendency of Finance. Bancolombia can recommend the services of CCS. Because of the affiliation, Bancolombia has an incentive to recommend CCS over another broker dealer.

**Valores Banistmo S.A. ("Banistmo")** is an affiliated broker dealer and investment adviser registered with the Panamanian Superintendency of Capital Markets. Banistmo can recommend the services of CCS. Because of the affiliation, Banistmo has an incentive to recommend CCS over another broker dealer.

Valores Banagricola S.A. de C.V. ("Banagricola") is an affiliated broker dealer registered with the Salvadorian Superintendency of the Financial System. Banagricola can recommend the services of CCS. Because of the affiliation, Banagricola has an incentive to recommend CCS over another broker dealer.

Gestora De Fondos De Inversión Banagricola, S.A. ("Gestora Banagricola") is an asset manager registered with the Salvadorian Superintendency of the Financial System. Gestora Banagricola can recommend the services of CCS. Because of the affiliation, Gestora Banagricola has an incentive to recommend CCS over another broker dealer.

**Agrovalores S.A.** ("Agrovalores") is an affiliated broker dealer registered with the Guatemalan Superintendency of Banks. Agrovalores can recommend the services of CCS. Because of the affiliation, Agrovalores has an incentive to recommend CCS over another broker dealer.

Please request the Disclosures page to your financial professional for the current information about CCS's brokerage compensation and related conflicts of interest. CCS updates this disclosure from time to time. CCS may not notify you when these changes are made, so you should consult with your financial professional to learn about any changes that have been made.

#### Schedule I

**Brokerage Account Fees & Charges** 

Outlined below are various fees for related services and activities provided to customers of Cibest Capital Securities, LLC ("CCS" or the "Firm"), which in certain instances are in addition to services provided by its clearing firm. Certain fees may not apply or may be discounted based on the type of account you have and/or the amount of assets you hold in your accounts. Other fees are only charged when the associated services are requested or when special processing is required. As a result, many fees listed below may not apply to your account. Please note, a portion of the fees are comprised of direct charges assessed by the clearing firm and the balance is charged by CCS, please contact CCS Compliance Department for further details regarding the charges. Any balance difference in fees is received by CCS as additional revenue that may be utilized to offset existing operational expenses with the remaining balance constituting additional compensation to CCS. The schedule below is not an exhaustive list of all account fees and charges.

If you have any questions about fees, please contact your financial professional.

	Commission	Minimum	
Trading			
Equities / ETF	Up to 3%	\$ 50	

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Equities / ETF (Self-trading)	Up to 3%	\$ 15
Fixed Income	Up to 3%	\$ 50
Mutual Funds	Up to 3%	\$ 15
Options	Up to \$3 per contract	\$ 15
Structured Notes	Up to 3%	\$ 50

	Fee	Frequency
Paper Delivery Fee		
Confirmation Fee (Physical)	\$ 3	Per Trade
Statements (Physical)	\$ 3	Per delivery
Account Fee		
Account Maintenance Fee	\$ 250	Annual
Inactive Accounts and Margin Extension		
Inactive Account <sup>1</sup>	\$ 150	Annual
Margin Extension	\$ 25	Per event
Account Transfers		
Euroclear Free Delivery (Outgoing)	\$ 20	Per item
ACAT – Automatic Outgoing Transfers	\$ 200	Per event

	Fee	Frequency
Transfers		
ACH Return Charge	\$ 30	Per event
Wire Transfers (same Beneficiary)	\$ 25	Per transfer
Wire Transfers (Third party)	\$ 50	Per transfer
DRS Transfer (Pershing to customer)	\$ 20	Per transfer
Legal, GNMA, and Restricted Items	\$ 140	Per transfer
Non-U.S. Market Transfers (Euroclear)	\$ 20	Per item

Non-U.S. Market Transfers (Euroclear DWAC)	\$ 160	Per item
Accommodation Transfer	\$ 70	Per transfer
Register and Ship Physical Certificate	\$ 70	Per transfer

Other Costs		
Certified check delivery	\$ 50	Per delivery
Overnight Mailing Customer	<u>\$ 50</u>	Per event
Returned Check	\$ 30	Per event
Stop Check Fee	\$ 30	Per event
Voluntary Reorganization	\$ 50	Per event
Mandatory Reorganization	\$ 0	Per event
Forced Statement Production	\$ 3	Per statement

1 An inactive retail or mutual fund only retail account is defined as an account holding a security for a full calendar year (January 1 – December 31) without generating: a) a trade or b) margin interest of at least \$100.00.

Force Year End Account Report	\$ 3	Per report
Physical Private Placements	\$ 600	Per trade
Safekeeping	\$ 5	Per position, per month

	Ticket Fee
Managed Account	
Equities / ETFs	\$ 20
Fixed Income	\$ 50
Mutual Funds	\$ 15
Options	\$ 3 per contract
Structured Notes	\$ 50
Equities / ETFs	\$ 20

	Interest Charge	
Margin		
\$0 - \$99,999	Fed Fund + up to 225 bps	
\$100,000 - \$999,999	Fed Fund + up to 200 bps	
> \$1,000,000	Fed Fund + up to 175 bps	

	Interest Charge
Loan Advance	
\$0 - \$99,999	Prime rate + up to 150 bps
\$100,000 - \$999,999	Prime rate + up to 125 bps
> \$1,000,000	Prime rate + up to 100 bps
7 71,000,000	1 Time rate 7 up to 100 bp3

	Annual Fee
Corestone <sup>2</sup>	Ailliudi i CC
Corestone	
Silver plus	\$ 75
Gold	\$ 125
Platinum	\$ 175
Corporate Gold	\$ 175
Corporate Platinum	\$ 275
Certified card delivery	\$ 60
Cash Advance Transaction (Non-ATM)	0.5%
Cash Advance Transaction (Outside US)	1%

<sup>2</sup> For more information regarding Corestone products please contact your financial professional.