

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER, AND CONSENT
NO. 2015048250401**

TO: Department of Enforcement
Financial Industry Regulatory Authority (FINRA)

RE: Transamerica Financial Advisors, Inc. (Respondent)
Member Firm
CRD No. 16164

Pursuant to FINRA Rule 9216, Respondent Transamerica Financial Advisors, Inc. (TFA) submits this Letter of Acceptance, Waiver, and Consent (AWC) for the purpose of proposing a settlement of the alleged rule violations described below. This AWC is submitted on the condition that, if accepted, FINRA will not bring any future actions against Respondent alleging violations based on the same factual findings described in this AWC.

I.

ACCEPTANCE AND CONSENT

- A. Respondent hereby accepts and consents, without admitting or denying the findings and solely for the purposes of this proceeding and any other proceeding brought by or on behalf of FINRA, or to which FINRA is a party, prior to a hearing and without an adjudication of any issue of law or fact, to the entry of the following findings by FINRA:

BACKGROUND

TFA has been a FINRA member since 1985, maintaining its home office in St. Petersburg, Florida. The firm currently has approximately 3,400 registered representatives and over 350 branch offices. It conducts a general securities business with an emphasis in annuity and mutual fund products.

TFA does not have any relevant disciplinary history.

OVERVIEW

TFA failed to reasonably supervise its representatives' recommendations of three different products—variable annuities, mutual funds, and 529 plans—resulting in significant customer harm.

First, from May 1, 2010, through May 15, 2016, TFA failed to reasonably supervise representatives' variable annuity recommendations. During this period, the firm's commissions from the sale of variable annuities comprised more than 40% of the firm's total revenue. Yet, TFA's system for supervising variable annuity sales and exchanges was deficient, resulting in various sales practice violations. Most significantly, the firm failed to detect that certain of its representatives made thousands of misstatements to

customers in recommending variable annuity exchanges, understating the benefits of the existing variable annuity and overstating the benefits of the new variable annuity.

Second, from January 1, 2009, through November 15, 2016, TFA failed to reasonably supervise representatives' sale of certain mutual funds. The firm relied on its representatives to determine the applicability of sales charge waivers to customers' mutual fund purchases, but the firm failed to provide guidance to representatives to assist them in making this determination and failed to establish a system to verify whether waivers were properly applied. As a result, TFA failed to apply approximately \$438,239 in available waivers to customers.

Finally, from May 1, 2010, through May 31, 2015, TFA failed to reasonably supervise representatives' recommendations to customers to purchase particular share classes of 529 savings plans. TFA did not provide adequate guidance to representatives regarding the importance of considering share-class differences when recommending 529 plans and did not provide supervisors with the information necessary to properly evaluate the suitability of 529 share-class recommendations.

As a result of the foregoing, TFA violated NASD Rules 3010(a) and (b); FINRA Rules 2330(b), (c), (d), and (e), 3110(a) and (b), and 2010; and MSRB Rules G-27(a), (b), and (c).¹

FACTS AND VIOLATIVE CONDUCT

This matter originated from FINRA's 2015 cycle exam of TFA.

A. TFA failed to reasonably supervise representatives' variable annuity recommendations.

From May 1, 2010, through May 15, 2016, TFA sold over 51,000 variable annuity policies. The firm and its representatives received compensation from new variable annuity sales, trials, and subsequent contributions in the form of gross dealer commissions in excess of \$591 million, representing more than 40% of the firm's total revenue.

FINRA Rule 2330 imposes specific requirements on firms' supervision of representatives' variable annuity purchase and exchange recommendations.

Variable annuities are complex investments that are commonly marketed and sold to retirees or individuals saving for retirement. Due in part to the complexity of these products, FINRA issued Rule 2330 to require that firms provide more comprehensive and targeted protection to investors who purchase or exchange variable annuities.

¹ FINRA Rule 3110 superseded NASD Rule 3010 on December 1, 2014.

Among other things, FINRA Rule 2330 requires:

- that firms and representatives who recommend variable annuities have a reasonable basis to conclude the proposed recommendations are suitable and that the customers have been informed of various features of the variable annuities, such as the potential surrender periods and surrender charges, potential tax penalties, and potential charges for and features of riders;
- that representatives who recommend that customers exchange one variable annuity for another consider the impact of the exchange and whether the customer would incur surrender charges, be subject to the commencement of a new surrender period, lose existing benefits, or be subject to increased fees or charges as a result of the exchange;
- that a registered principal reviews each variable annuity transaction and approves such transaction only if the principal has determined that there is a reasonable basis to believe that the transaction would be suitable;
- that firms implement surveillance procedures to determine if associated persons have rates of effecting deferred variable annuity exchanges that raise for review whether such rates of exchanges evidence conduct inconsistent with the applicable provisions of this Rule, other applicable FINRA Rules, or the federal securities laws; and
- that firms develop training programs reasonably designed to ensure that registered representatives and reviewing principals are complying with the requirements of Rule 2330 and that they understand the material features of deferred variable annuities.

In addition, FINRA Rule 3110 and its predecessor, NASD Rule 3010, require FINRA members to establish and maintain a system and written procedures to supervise the activities of its associated persons that are reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable FINRA Rules.

FINRA Rule 2010 requires FINRA members, in the conduct of their business, to observe high standards of commercial honor and just and equitable principles of trade.

TFA failed to reasonably supervise representatives' variable annuity exchange recommendations.

When recommending a variable annuity exchange, TFA required its registered representatives to complete a six-page disclosure form. The form included important disclosures to the customer related to the fee structure, benefits, and features of both the new and existing variable annuities, as well as the representative's rationale for recommending the exchange. Importantly, TFA's principals relied on the information in the disclosure forms to determine whether to approve variable annuity exchanges.

TFA, however, failed to provide adequate training to its representatives regarding how to complete the disclosure forms. Similarly, the firm failed to provide adequate training to supervisors regarding how they should verify the information on the disclosure forms or how they should use that information to conduct a meaningful comparison of the old and new variable annuities. As a result of these supervisory deficiencies, certain firm principals approved variable annuity exchanges based on disclosure forms that contained inaccurate or missing information.

Between January 1, 2014, and May 15, 2016, more than half of the 3,781 exchanges approved by the firm contained at least one misstatement or omission. These inaccuracies and omissions, which pertained to surrender charges, fees, and other features of the existing and proposed variable annuities, each had the effect of making the exchange appear to be more favorable than was the actual case. For example:

- 45 disclosure forms (1%) either understated or failed to disclose that a surrender charge would be assessed in connection with the exchange;
- 58 disclosure forms (2%) inaccurately stated that the new variable annuity's up-front bonus would offset the surrender charge imposed;
- 577 disclosure forms (15%) materially overstated the fees associated with the customer's existing variable annuity;
- 177 disclosure forms (5%) materially understated the fees associated with the recommended variable annuity;
- 495 disclosure forms (13%) inaccurately stated that the new variable annuity was not more expensive than the customer's existing variable annuity;
- 984 disclosure forms (26%) were either blank or stated that there were no advantages associated with retaining the customer's existing variable annuity;
- 173 disclosure forms (5%) failed to disclose the death benefit associated with the customer's existing variable annuity; and
- 971 disclosure forms (26%) failed to disclose a guaranteed value associated with a living benefit rider on the customer's existing variable annuity.

In certain instances, these misstatements or omissions prevented TFA's reviewing principals from having a reasonable basis to approve these transactions as required by FINRA Rule 2330(c).

TFA failed to reasonably surveil representatives' rates of variable annuity exchanges.

From May 1, 2010, through May 15, 2016, TFA maintained an exception report for analyzing patterns of variable annuity exchanges, but the report was not reasonably designed. Specifically, the report only identified representatives who conducted a certain volume of exchanges in a quarter, and only if the total value of those exchanges exceeded 50% of the representative's overall business. This report was insufficient to detect inappropriate rates of exchange because representatives who effected a large number of

exchanges but had a high overall level of production could be excluded from additional scrutiny because of the 50% threshold.

TFA failed to reasonably supervise representatives' variable annuity share-class recommendations.

From May 1, 2010, through May 15, 2016, TFA sold variable annuity contracts with different share class options, including B shares, L shares, and C shares. B-share contracts are the most common share class sold in the industry and typically have a seven-year surrender period. L-share contracts typically provide a shorter surrender period of three to five years and have annual fees that are between 0.35% and 0.50% higher than most B-share contracts. However, some L-share contracts have a specific provision, commonly called a "persistency credit," which reduces the annual fees so it is comparable to a B-share contract after the product is held for a period of time, generally seven to ten years. C-share contracts typically have no surrender period and have annual fees that are 0.05% to 0.10% higher than most L-share contracts.

Because C- and L-share contracts generally charge higher fees than comparable B-share contracts, the sale of these contracts may raise suitability concerns when sold to customers with long-term investment horizons. This is especially true when combining such contracts with a long-term living benefit rider, such as a Guaranteed Minimum Income Benefit (GMIB) rider or Guaranteed Minimum Withdrawal Benefit (GMWB) rider. These riders typically cost the customer additional annual fees ranging from 1.0% to 1.5% of the face value of the variable annuity contract. GMIB riders usually require a holding period of ten years before the customer can access the income stream benefit. GMWB riders typically require the customer to hold the variable annuity for more than five years to obtain the full benefit of the guaranteed minimum withdrawal.

From May 1, 2010, to May 31, 2015, the firm sold 1,965 C-share contracts, and 7,809 L-share contracts, collectively accounting for 21.9% of all variable annuities sold during that period, for an aggregate principal amount of approximately \$1.03 billion. The firm's representatives paired nearly 41% of C shares and 82.5% of L shares with long-term living benefit riders such as a GMIB or GMWB. Moreover, many of TFA's customers who purchased C or L shares had longer-term investment horizons of over seven years.²

TFA did not reasonably supervise the sale of these multi-share class variable annuities.

First, TFA failed to provide reasonable training and guidance to its representatives on the features, fees, and surrender charges of the various share classes. As a result, certain representatives lacked the information necessary to compare share classes in making suitability determinations. Similarly, the firm failed to provide adequate training or guidance to its supervisors regarding variable annuity share classes. Consequently, supervisors did not identify common red flags, including sales of C- and L-share

² Based on a review of a sample of 950 C- and L-share contracts, the firm's registered representatives sold these shorter-term share classes to customers with a long-term investment horizon (i.e., over seven years) on 840 occasions—88.4% of the time. Additionally, 183 customers (19.3%) were under the age of 55.

contracts to customers with no short-term liquidity needs or to customers who indicated a long-term investment horizon, and representatives who recommended that customers combine a C-share or L-share purchase with a long-term living benefit rider.

Second, TFA lacked a reasonably designed system to detect red flags of inappropriate share-class recommendations. TFA did not have any system to monitor for patterns or trends pertaining to variable annuity share-class suitability. In fact, the firm's blotter for variable annuity transactions did not capture share-class data.

Even when the firm became aware of red flags regarding representatives' variable annuity share-class recommendations, it failed to take appropriate action. For example, the firm was aware of representatives who employed a "one-size-fits-all" approach with respect to variable annuity share classes recommended to their customers. At least four TFA representatives sold the same shorter-term share class to between 70% and 95% of their variable annuity customers. Although TFA's supervisory and compliance personnel were aware of these representatives' tendency to sell only one share class, the firm did not reasonably supervise these representatives to ensure that they had a reasonable basis for each share class recommendation to their customers.

By failing to reasonably supervise representatives' variable annuity recommendations, TFA violated NASD Rules 3010(a) and (b) and FINRA Rules 2330(b), (c), (d), and (e), 3110(a) and (b), and 2010. In addition, by making disclosures that contained materially inaccurate information or omitted material information in connection with variable annuity exchange recommendations, TFA violated FINRA Rule 2010.

B. TFA failed to reasonably supervise representatives' sale of certain mutual funds.

From January 1, 2009, through November 15, 2016, TFA sold mutual funds with different share classes, including A shares, B shares, and C shares. Class A shares typically include a front-end sales charge, and have annual fund expenses, including ongoing distribution and service fees typically around 0.25%. B and C shares do not generally carry a front-end sales charge but have significantly higher distribution and service fees (typically 1%) and may include a contingent deferred sales charge.

During this period, many mutual funds waived the front-end sales charges on A shares for certain retirement plan and charitable organization customers. TFA failed to reasonably supervise the application of these sales charge waivers. The firm relied on its representatives to determine the applicability of sales charge waivers but failed to provide adequate guidance or training to assist them in making this determination. Furthermore, TFA had no system or processes to detect whether available sales charge waivers were applied properly.

As a result, TFA failed to apply sales charge waivers to certain mutual fund purchases made by eligible customers; instead, selling them A shares with front-end sales charges or B or C shares with back-end sales charges and higher ongoing fees and expenses. These sales caused customers to pay higher fees than they were actually required to pay.

Specifically, the firm overcharged 433 accounts a total of \$438,239. TFA reimbursed each of these accountholders during FINRA's examination.

By failing to reasonably supervise mutual fund sales to ensure that eligible customers who purchased mutual fund shares received the benefit of applicable sales charge waivers, TFA violated NASD Rules 3010(a) and (b) and FINRA Rules 3110(a) and (b), and 2010.

C. TFA failed to reasonably supervise representatives' 529 plan share-class recommendations.

529 plans are tax-advantaged municipal securities that are designed to encourage saving for the future educational expenses of a designated beneficiary.³ 529 plans are sponsored by states, state agencies, or educational institutions. States offer 529 plans either directly, through designated broker-dealers, or both.

Shares of 529 plans are sold in different classes with different fee structures.⁴ Class A shares typically impose a front-end sales charge but charge lower annual fees compared to other classes.⁵ C shares typically impose no front-end sales charge but impose higher annual fees than A shares. Because of their higher annual fees, C shares may be more expensive over extended holding periods and, consequently, A shares are frequently the suitable option for accounts with younger beneficiaries and longer investment horizons.⁶

Because 529 plans are municipal securities, the sale of 529 plans are governed by the rules of the Municipal Securities Rulemaking Board (MSRB). MSRB Rule G-27(a) requires each broker, dealer, and municipal securities dealer to supervise the conduct of its municipal securities activities to ensure compliance with MSRB rules and federal securities laws. MSRB Rules G-27(b) and (c) require each firm to establish and maintain a system, and to establish, maintain, and enforce written procedures, to supervise its municipal securities activities in a manner that is reasonably designed to achieve compliance with the federal securities laws and MSRB Rules.

From May 1, 2010, through May 31, 2015, TFA's systems and procedures for supervising representatives' 529 plan share-class recommendations were not reasonably designed. TFA did not provide adequate guidance to representatives regarding the

³ 529 plans are named after Section 529 of the Internal Revenue Code (26 U.S.C. § 529), which grants tax-exempt status to qualified tuition programs.

⁴ A 529 plan is structured as a trust. A customer purchases "units" in the trust. For purposes of this AWC, the terms "unit class" and "share class" are used interchangeably.

⁵ Additionally, some 529 plans reduce front-end sales charges if the aggregate amount invested meets certain thresholds—known as breakpoint discounts.

⁶ Class C shares may be suitable for accounts with younger beneficiaries based on the customers' particular facts and circumstances. Additionally, as of January 1, 2018, amendments to the United States tax code permit 529 plan customers to withdraw tax-free up to \$10,000 per beneficiary, per year, for tuition in connection with enrollment or attendance at a public, private, or religious elementary or secondary school. This AWC addresses misconduct prior to January 2018.

importance of considering share-class differences when recommending 529 plans. And the firm failed to provide supervisors with adequate guidance necessary to review the suitability of representative's 529 plan share-class recommendations. For example, the firm's policies and procedures relating to 529 plans did not instruct supervisors to consider either (1) the age of the beneficiary or (2) the number of years until expected withdrawals—both critical factors in determining the suitability of the recommended share class.

By failing to establish and maintain a supervisory system, and failing to establish, maintain, and enforce written procedures reasonably designed to supervise the suitability of 529 plan share-class recommendations, TFA violated MSRB Rules G-27(a), (b) and (c).

B. Respondent also consents to the imposition of the following sanctions:

- a censure;
- a \$4,400,000 fine;⁷ and
- restitution of \$4,354,160 as described below:
 - \$3,594,754 to 1,141 customers (specified on Attachment A) related to inaccurate exchange disclosures;
 - \$438,239 to 433 customers related to mutual fund sales charge waivers, which the firm paid during FINRA's examination; and
 - \$321,167, plus interest, to 831 customers (specified on Attachment B) related to the sale of Class C shares in certain 529 Plans.

Restitution is ordered to be paid to the customers listed on Attachments A and B to this AWC in the total amount of \$3,915,921. Restitution paid to customers listed on Attachment B to this AWC shall add interest at the rate set forth in Section 6621(a)(2) of the Internal Revenue Code, 26 U.S.C. § 6621(a)(2), from January 1 of the year during which each respective customer first incurred harm for the specific transactions due to the purchase of a Class C share until the date this AWC is accepted by the National Adjudicatory Council (NAC).

A registered principal on behalf of Respondent shall submit satisfactory proof of payment of restitution and, where applicable, prejudgment interest (separately specifying the date and amount of each paid to each customer listed on Attachment A and B) or of

⁷ FINRA is not assessing a fine for the firm's violation of MSRB rules. In resolving this matter without a monetary fine as to the MSRB rule violations, Enforcement recognizes TFA's extraordinary cooperation pertaining to the firm's 529 plan violations. The firm provided substantial assistance to FINRA in its investigation, including providing FINRA staff with detailed information about the challenges associated with collecting and assessing 529 plan data. Additionally, TFA engaged an outside consulting firm to conduct a complex analysis to identify potentially disadvantaged customers on an expedited basis.

reasonable and documented efforts undertaken to effect restitution. No later than 120 days after the date of the notice of acceptance of the AWC, such proof shall be submitted by email to EnforcementNotice@FINRA.org from a work-related account of the registered principal of Respondent. The email must identify Respondent and the case number and include a copy of the check, money order, or other method of payment.

If for any reason Respondent cannot locate any customer identified in Attachment A or B after reasonable and documented efforts within 120 days after the date of the notice of acceptance of the AWC, or such additional period agreed to by FINRA in writing, Respondent shall forward any undistributed restitution and interest to the appropriate escheat, unclaimed property, or abandoned property fund for the state in which the customer is last known to have resided. Respondent shall provide satisfactory proof of such action to FINRA in the manner described above, within 14 calendar days of forwarding the undistributed restitution and interest to the appropriate state authority.

Respondent also will identify current customers who may incur or may continue to incur excess fees and expenses following acceptance of this AWC as the result of having purchased 529 plan Class C shares instead of Class A shares, where those Class C shares do not automatically convert to A shares under the applicable plan documents (eligible 529 plan account holders). Respondent will identify eligible 529 plan account holders, describe for them the difference in fees associated with Class C shares and Class A shares, along with the impact of those fees over time, and review with eligible 529 plan account holders their share class selection. Respondent will assist any eligible 529 plan account holder who requests that his/her Class C shares be converted to Class A shares, including effecting such conversion at no cost to the account holder where practical.

Not later than 120 days after the date of the notice of acceptance of the AWC, or such additional period agreed to by FINRA in writing, Respondent shall certify completion of the steps identified in the preceding paragraph, including that conversion of share classes for any eligible 529 plan account holder who requested conversion occurred at no cost to the account holder where practical.

Restitution payments to customers shall be preceded or accompanied by a letter, not unacceptable to FINRA, describing the reason for the payment and the fact that the payment is being made pursuant to a settlement with FINRA and as a term of this AWC.

Respondent specifically and voluntarily waives any right to claim an inability to pay, now or at any time after the execution of this AWC, the monetary sanctions imposed in this matter.

The imposition of a restitution order or any other monetary sanction in this AWC, and the timing of such ordered payments, does not preclude customers from pursuing their own actions to obtain restitution or other remedies.

Respondent agrees to pay the monetary sanctions upon notice that this AWC has been accepted and that such payment is due and payable. Respondent has submitted an

Election of Payment form showing the method by which it proposes to pay the fine imposed.

The sanctions imposed in this AWC shall be effective on a date set by FINRA.

II.

WAIVER OF PROCEDURAL RIGHTS

Respondent specifically and voluntarily waives the following rights granted under FINRA's Code of Procedure:

- A. To have a complaint issued specifying the allegations against it;
- B. To be notified of the complaint and have the opportunity to answer the allegations in writing;
- C. To defend against the allegations in a disciplinary hearing before a hearing panel, to have a written record of the hearing made, and to have a written decision issued; and
- D. To appeal any such decision to the NAC and then to the U.S. Securities and Exchange Commission and a U.S. Court of Appeals.

Further, Respondent specifically and voluntarily waives any right to claim bias or pre-judgment of the Chief Legal Officer, the NAC, or any member of the NAC, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including its acceptance or rejection.

Respondent further specifically and voluntarily waives any right to claim that a person violated the ex parte prohibitions of FINRA Rule 9143 or the separation of functions prohibitions of FINRA Rule 9144, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including its acceptance or rejection.

III.

OTHER MATTERS

Respondent understands that:

- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs (ODA), pursuant to FINRA Rule 9216;

- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against Respondent; and
- C. If accepted:
 - 1. this AWC will become part of Respondent's permanent disciplinary record and may be considered in any future action brought by FINRA or any other regulator against Respondent;
 - 2. this AWC will be made available through FINRA's public disclosure program in accordance with FINRA Rule 8313;
 - 3. FINRA may make a public announcement concerning this agreement and its subject matter in accordance with FINRA Rule 8313; and
 - 4. Respondent may not take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or indirectly, any finding in this AWC or create the impression that the AWC is without factual basis. Respondent may not take any position in any proceeding brought by or on behalf of FINRA, or to which FINRA is a party, that is inconsistent with any part of this AWC. Nothing in this provision affects Respondent's testimonial obligations or right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.
- D. Respondent may attach a corrective action statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. Respondent understands that it may not deny the charges or make any statement that is inconsistent with the AWC in this statement. This statement does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA.

The undersigned, on behalf of Respondent, certifies that a person duly authorized to act on Respondent's behalf has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; that Respondent has agreed to the AWC's provisions voluntarily; and that no offer, threat, inducement, or promise of any kind, other than the terms set forth in this AWC and the prospect of avoiding the issuance of a complaint, has been made to induce Respondent to submit this AWC.

December 15, 2020

Date



Transamerica Financial Advisors, Inc.
Respondent

Print Name: George Chuang

Title: President

Reviewed by:

Brian L. Rubin
Counsel for Respondent
Eversheds Sutherland (US) LLP
700 Sixth Street, NW, Suite 700
Washington, DC 20001-3980
Phone: (202) 383-0124
Fax: (202) 637-3593
Email: brianrubin@eversheds-sutherland.com

Accepted by FINRA:

Signed on behalf of the
Director of ODA, by delegated authority

Date

Dan Cristol
Counsel
FINRA Department of Enforcement
5200 Town Center Circle
Tower I, Suite 200
Boca Raton, FL 33486
Phone: (561) 443-8039
Fax: (202) 721-7585

The undersigned, on behalf of Respondent, certifies that a person duly authorized to act on Respondent's behalf has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; that Respondent has agreed to the AWC's provisions voluntarily; and that no offer, threat, inducement, or promise of any kind, other than the terms set forth in this AWC and the prospect of avoiding the issuance of a complaint, has been made to induce Respondent to submit this AWC.

December 15, 2020

Date

[REDACTED]
Transamerica Financial Advisors, Inc.
Respondent

Print Name: George Chuang

Title: President

Reviewed by:

Brian L. Rubin

Brian L. Rubin
Counsel for Respondent
Eversheds Sutherland (US) LLP
700 Sixth Street, NW, Suite 700
Washington, DC 20001-3980
Phone: (202) 383-0124
Fax: (202) 637-3593
Email: brianrubin@eversheds-sutherland.com

Accepted by FINRA:

Signed on behalf of the
Director of ODA, by delegated authority

Dan Cristol

Dan Cristol
Counsel
FINRA Department of Enforcement
5200 Town Center Circle
Tower I, Suite 200
Boca Raton, FL 33486
Phone: (561) 443-8039
Fax: (202) 721-7585

December 21, 2020

Date

Attachment A

Customer	Restitution Amount
1609	\$ 9,542.09
2346	\$ 3,172.62
2770	\$ 1,203.98
2806	\$ 3,185.93
4177	\$ 1,681.76
4207	\$ 6,008.92
5251	\$ 2,715.26
5342	\$ 1,490.79
5342	\$ 2,726.22
5535	\$ 3,104.59
6016	\$ 1,828.54
6500	\$ 6,763.64
7897	\$ 4,000.00
8043	\$ 11,389.32
12233	\$ 360.00
12369	\$ 157.93
12467	\$ 2,850.52
12584	\$ 979.16
12611	\$ 3,813.21
12638	\$ 2,629.08
12669	\$ 3,178.11
13026	\$ 4,309.85
13155	\$ 1,227.47
13207	\$ 15,931.84
13574	\$ 356.97
13869	\$ 4,699.40
14269	\$ 206.54
14536	\$ 120.50
14596	\$ 6,861.96
14640	\$ 198.68
14737	\$ 3,391.03
14759	\$ 828.10
14949	\$ 2,749.00
15031	\$ 761.37
15379	\$ 8,022.71
15410	\$ 3,301.55
15439	\$ 787.82
15486	\$ 1,330.70
15552	\$ 3,412.62
15893	\$ 268.34
16130	\$ 486.97
16640	\$ 398.55
16669	\$ 517.45
17033	\$ 1,255.20
17063	\$ 88.60
17379	\$ 777.58
17426	\$ 1,580.57
17748	\$ 2,218.50

Customer	Restitution Amount
608895	\$ 946.35
608916	\$ 105.46
608947	\$ 18,265.92
609009	\$ 8,301.90
609058	\$ 973.22
609114	\$ 2,502.23
609287	\$ 12,961.95
609372	\$ 6,341.90
609406	\$ 6,700.39
609540	\$ 318.96
609660	\$ 4,418.00
609810	\$ 359.72
610024	\$ 6,908.53
610045	\$ 13,266.41
610066	\$ 749.43
610224	\$ 4,327.64
610309	\$ 949.61
610338	\$ 3,445.46
610443	\$ 13,000.00
610564	\$ 543.01
610622	\$ 7,869.79
610891	\$ 636.14
610954	\$ 5,950.91
611131	\$ 943.54
611229	\$ 584.14
611291	\$ 2,911.93
611350	\$ 1,559.37
611440	\$ 308.00
611469	\$ 1,925.11
611520	\$ 201.37
611579	\$ 517.49
611692	\$ 1,120.49
612081	\$ 298.71
612115	\$ 1,357.72
612187	\$ 1,435.34
612214	\$ 245.14
612237	\$ 1,458.06
612358	\$ 1,784.11
612385	\$ 2,540.76
612410	\$ 34,706.77
612446	\$ 282.53
612531	\$ 610.54
612632	\$ 4,500.00
612666	\$ 1,806.72
612695	\$ 1,350.00
612916	\$ 5,853.06
613131	\$ 2,425.22
613209	\$ 10,735.07

Customer	Restitution Amount
653766	\$ 1,745.37
654015	\$ 856.31
654208	\$ 841.26
654238	\$ 1,770.10
654425	\$ 146.05
654456	\$ 2,837.49
654638	\$ 2,915.33
654797	\$ 468.77
654948	\$ 502.70
655161	\$ 835.97
655520	\$ 1,444.48
655701	\$ 1,174.69
655745	\$ 2,493.19
655812	\$ 3,000.00
655881	\$ 1,706.72
655998	\$ 793.10
656069	\$ 505.30
656174	\$ 529.68
656257	\$ 1,449.39
656283	\$ 305.24
656362	\$ 106.86
656415	\$ 1,826.06
656463	\$ 788.89
656493	\$ 317.68
656517	\$ 862.06
656756	\$ 1,535.23
656782	\$ 1,549.50
657009	\$ 1,544.40
657033	\$ 12,589.53
657071	\$ 9,297.46
657102	\$ 32,233.86
657310	\$ 74.22
657457	\$ 3,689.89
657502	\$ 430.00
657526	\$ 443.94
657682	\$ 591.59
657776	\$ 326.95
657828	\$ 1,636.93
657853	\$ 437.37
657878	\$ 310.64
658023	\$ 99.57
658058	\$ 99.47
658093	\$ 6,405.42
658126	\$ 759.30
658240	\$ 743.31
658293	\$ 24,834.94
658320	\$ 24,000.00
658591	\$ 100.00

Attachment A

Customer	Restitution Amount
17816	\$ 98.07
17899	\$ 1,210.02
17931	\$ 511.17
18018	\$ 991.41
18045	\$ 231.29
18125	\$ 189.58
18179	\$ 400.00
18412	\$ 292.08
18439	\$ 922.07
18466	\$ 666.17
18493	\$ 826.21
18799	\$ 46.75
18825	\$ 1,124.77
18952	\$ 941.03
19254	\$ 22,070.64
19275	\$ 349.01
19450	\$ 3,409.65
19474	\$ 538.99
19764	\$ 4,658.03
19794	\$ 965.75
19827	\$ 1,293.02
19857	\$ 937.35
20407	\$ 99.02
20574	\$ 3,788.69
20674	\$ 236.75
20755	\$ 9,170.36
20852	\$ 1,953.73
20918	\$ 1,006.33
21023	\$ 119.75
21122	\$ 4,164.50
21176	\$ 2,537.40
21761	\$ 1,238.07
21817	\$ 1,751.46
22032	\$ 1,410.70
25410	\$ 724.41
25716	\$ 1,942.35
25782	\$ 156.99
26002	\$ 6,483.79
26028	\$ 6,712.77
26049	\$ 3,237.11
26236	\$ 2,572.81
26292	\$ 549.31
26320	\$ 8,415.68
26506	\$ 52.95
26599	\$ 590.70
26656	\$ 419.83
26751	\$ 1,048.18
26955	\$ 838.75

Customer	Restitution Amount
613265	\$ 390.79
613480	\$ 141.76
613595	\$ 1,250.02
613650	\$ 1,940.41
613676	\$ 318.70
613884	\$ 11,339.84
613931	\$ 5,648.30
614089	\$ 203.67
614118	\$ 174.14
614173	\$ 742.37
614336	\$ 2,591.00
614425	\$ 2,661.75
614647	\$ 275.21
615086	\$ 3,325.25
615217	\$ 560.04
615590	\$ 346.71
615620	\$ 840.66
615679	\$ 602.35
615713	\$ 772.22
615849	\$ 1,168.24
615946	\$ 414.37
615972	\$ 3,579.77
616079	\$ 7,910.05
616289	\$ 2,495.35
616368	\$ 532.33
616399	\$ 604.45
616592	\$ 780.00
616758	\$ 1,743.87
616782	\$ 2,746.26
616845	\$ 343.65
616869	\$ 16,875.00
616889	\$ 4,417.55
616952	\$ 908.93
617030	\$ 2,268.76
617054	\$ 3,342.83
617075	\$ 1,105.91
617337	\$ 527.89
617364	\$ 436.06
617678	\$ 118.82
617771	\$ 7,371.26
617829	\$ 610.17
617880	\$ 7,400.00
618086	\$ 2,771.11
618348	\$ 337.84
618603	\$ 360.00
618661	\$ 8,066.00
618758	\$ 123.56
618975	\$ 384.70

Customer	Restitution Amount
658611	\$ 547.16
659040	\$ 64.67
659069	\$ 1,514.58
659239	\$ 2,000.00
659533	\$ 578.92
660036	\$ 1,187.92
660059	\$ 1,294.43
660139	\$ 327.93
660168	\$ 382.20
660193	\$ 859.21
660537	\$ 3,782.86
660638	\$ 382.59
660664	\$ 1,675.49
660786	\$ 1,634.03
660816	\$ 12,771.75
660918	\$ 795.43
661049	\$ 327.59
661078	\$ 3,747.63
661112	\$ 1,944.17
661160	\$ 409.65
661260	\$ 1,335.79
661536	\$ 1,015.15
661937	\$ 2,762.94
661990	\$ 116.47
662074	\$ 1,999.82
662293	\$ 202.61
662345	\$ 581.74
662378	\$ 1,824.49
662485	\$ 739.92
662535	\$ 969.93
662569	\$ 200.80
662832	\$ 1,413.72
662931	\$ 1,962.75
663068	\$ 1,336.10
663117	\$ 520.00
663193	\$ 4,606.71
663218	\$ 1,028.36
663394	\$ 280.55
663603	\$ 366.00
663855	\$ 2,975.05
663963	\$ 2,650.00
663988	\$ 4,920.00
664013	\$ 1,328.00
664043	\$ 1,305.21
664093	\$ 3,131.21
664151	\$ 2,980.60
664240	\$ 1,435.95
664349	\$ 1,534.54

Attachment A

Customer	Restitution Amount
27079	\$ 2,392.06
27107	\$ 7,212.80
27200	\$ 5,181.87
27295	\$ 164.67
27349	\$ 180.27
27488	\$ 618.92
27537	\$ 1,249.06
27659	\$ 2,131.82
27688	\$ 328.56
27953	\$ 2,219.63
28160	\$ 708.64
28273	\$ 20,342.28
28312	\$ 17,465.73
28345	\$ 2,987.92
28370	\$ 13,696.79
28448	\$ 1,527.92
28503	\$ 91.71
28589	\$ 428.01
29047	\$ 1,152.86
29251	\$ 800.00
29275	\$ 7,957.51
29999	\$ 4,760.64
30132	\$ 2,062.22
30603	\$ 2,487.10
30698	\$ 3,784.57
31323	\$ 830.33
31851	\$ 5,683.82
32165	\$ 1,690.16
32438	\$ 823.88
32469	\$ 3,845.24
32559	\$ 619.30
32983	\$ 650.50
33013	\$ 8,562.01
33193	\$ 10,078.76
33433	\$ 21,020.01
35549	\$ 1,437.67
35577	\$ 2,069.56
35924	\$ 1,509.17
35965	\$ 4,886.87
36751	\$ 1,359.58
36779	\$ 2,071.23
36974	\$ 3,635.49
41727	\$ 6,051.88
42217	\$ 565.40
42367	\$ 133.94
42422	\$ 2,006.35
42572	\$ 241.48
42655	\$ 273.68

Customer	Restitution Amount
619081	\$ 2,360.86
619113	\$ 752.89
619146	\$ 9,760.00
619225	\$ 2,071.80
619362	\$ 620.68
619562	\$ 103.89
619687	\$ 417.09
619752	\$ 6,924.22
619777	\$ 208.75
619799	\$ 1,192.02
620218	\$ 3,937.50
620268	\$ 7,255.32
620325	\$ 673.67
620356	\$ 2,757.01
620444	\$ 1,230.02
620467	\$ 1,649.32
620514	\$ 244.33
620545	\$ 16,197.82
620690	\$ 3,245.84
620710	\$ 3,082.70
620947	\$ 20,615.41
620987	\$ 1,783.90
621025	\$ 5,159.31
621099	\$ 465.08
621244	\$ 3,021.44
621360	\$ 1,752.67
622198	\$ 2,297.35
622311	\$ 256.15
622465	\$ 151.00
622567	\$ 1,552.33
622600	\$ 184.89
622841	\$ 1,043.67
622906	\$ 362.66
622955	\$ 348.87
623278	\$ 1,767.19
623441	\$ 753.70
623740	\$ 599.97
623778	\$ 1,989.46
623829	\$ 2,975.86
623915	\$ 778.70
623950	\$ 718.90
624052	\$ 13,786.71
624129	\$ 322.62
624214	\$ 4,560.00
624361	\$ 4,300.16
624718	\$ 9,307.67
624817	\$ 241.16
624903	\$ 2,646.97

Customer	Restitution Amount
664408	\$ 1,638.27
664694	\$ 1,838.34
664736	\$ 30.00
665009	\$ 4,922.89
665036	\$ 61,420.09
665067	\$ 60.00
665332	\$ 10,786.06
665389	\$ 2,619.17
665426	\$ 2,415.51
665524	\$ 1,336.10
665602	\$ 1,587.67
665683	\$ 4,156.10
665913	\$ 8,803.31
666133	\$ 7,238.12
666228	\$ 2,472.36
666263	\$ 1,288.10
666289	\$ 2,266.64
666314	\$ 189.81
666341	\$ 246.01
666368	\$ 8,849.45
666587	\$ 3,902.92
666781	\$ 1,084.64
666840	\$ 1,231.69
666899	\$ 433.23
666939	\$ 2,989.85
666963	\$ 3,022.15
667078	\$ 5,947.99
667481	\$ 630.17
667514	\$ 605.40
667581	\$ 1,821.88
667675	\$ 108.16
667715	\$ 176.75
667869	\$ 358.50
667891	\$ 286.00
668119	\$ 169.00
668602	\$ 824.46
669042	\$ 451.86
669159	\$ 275.34
669233	\$ 18,388.52
669291	\$ 5,374.43
669411	\$ 1,833.34
669468	\$ 612.79
669505	\$ 2,389.90
669546	\$ 217.50
669758	\$ 406.52
669909	\$ 574.98
670022	\$ 21,499.03
670133	\$ 372.48

Attachment A

Customer	Restitution Amount
42682	\$ 1,144.00
42763	\$ 4,334.98
42865	\$ 7,091.10
43213	\$ 691.36
43571	\$ 2,347.29
43763	\$ 712.68
43795	\$ 482.75
43822	\$ 751.39
43851	\$ 530.00
43879	\$ 1,200.00
43998	\$ 25.15
44054	\$ 2,340.00
44182	\$ 1,745.78
44277	\$ 214.36
44424	\$ 5,535.71
44497	\$ 5,814.11
44670	\$ 3,119.86
44700	\$ 421.89
44726	\$ 524.18
44786	\$ 306.39
44812	\$ 171.20
44944	\$ 967.87
45036	\$ 377.14
45419	\$ 640.00
45449	\$ 1,221.22
45554	\$ 14,506.14
45597	\$ 3,875.00
45692	\$ 9,391.67
45719	\$ 12,562.67
45853	\$ 462.73
45913	\$ 214.84
46011	\$ 258.11
46062	\$ 30.43
46121	\$ 6,859.76
46309	\$ 4,992.11
46402	\$ 480.77
46431	\$ 948.62
46711	\$ 817.99
148818	\$ 1,089.80
149322	\$ 5,176.02
149517	\$ 71,242.55
149653	\$ 902.87
150774	\$ 195.00
151706	\$ 730.31
151885	\$ 357.58
152220	\$ 2,403.26
152358	\$ 687.74
153771	\$ 1,633.45

Customer	Restitution Amount
624967	\$ 1,408.27
625078	\$ 390.48
625113	\$ 385.10
625140	\$ 125.18
625167	\$ 161.41
625199	\$ 1,931.30
625358	\$ 864.99
625400	\$ 900.00
625727	\$ 2,491.88
625789	\$ 3,058.38
625877	\$ 991.44
625962	\$ 1,956.23
626166	\$ 3,870.88
626252	\$ 1,876.83
626346	\$ 1,863.00
626373	\$ 528.78
626545	\$ 1,019.35
626611	\$ 9,760.23
626894	\$ 545.14
627029	\$ 938.82
627290	\$ 1,409.86
627327	\$ 419.97
627396	\$ 655.57
627562	\$ 2,316.46
627750	\$ 1,316.83
627839	\$ 2,394.71
627921	\$ 291.59
628374	\$ 184.39
628438	\$ 2,082.09
628605	\$ 1,502.38
628632	\$ 1,037.53
628655	\$ 878.50
628678	\$ 1,780.23
628853	\$ 2,467.29
628972	\$ 8,890.59
629010	\$ 2,630.24
629031	\$ 815.58
629105	\$ 5,061.78
629157	\$ 241.26
629512	\$ 361.01
629826	\$ 3,785.06
629901	\$ 997.76
629997	\$ 2,421.95
630055	\$ 7,400.00
630086	\$ 8,099.58
630437	\$ 441.96
630720	\$ 3,438.11
631018	\$ 1,050.00

Customer	Restitution Amount
670324	\$ 1,180.62
670611	\$ 3,416.22
670668	\$ 4,556.53
671131	\$ 529.02
671263	\$ 2,188.82
671353	\$ 5,853.77
671458	\$ 1,011.27
671655	\$ 3,231.59
671984	\$ 1,745.55
672315	\$ 3,818.93
672872	\$ 158.76
672928	\$ 564.86
673137	\$ 1,934.36
673343	\$ 2,515.50
673646	\$ 3,869.72
673677	\$ 3,501.12
673901	\$ 1,601.41
674386	\$ 6,556.04
674632	\$ 17,403.93
674691	\$ 4,056.99
674720	\$ 920.39
674797	\$ 1,659.10
674848	\$ 6,690.89
674965	\$ 475.03
675243	\$ 430.13
675477	\$ 523.22
675627	\$ 2,691.21
675752	\$ 799.15
675777	\$ 902.24
676069	\$ 2,481.25
676362	\$ 118.98
677008	\$ 600.00
677273	\$ 344.20
677321	\$ 732.75
677471	\$ 1,645.66
677504	\$ 228.94
677729	\$ 10,598.30
678366	\$ 28,469.30
678438	\$ 761.51
678515	\$ 2,683.81
678541	\$ 1,385.36
678660	\$ 2,057.72
679128	\$ 279.43
679422	\$ 182.03
679712	\$ 247.86
679839	\$ 2,826.26
679915	\$ 695.77
680106	\$ 22,848.52

Attachment A

Customer	Restitution Amount
155123	\$ 4,061.41
156029	\$ 1,172.18
156058	\$ 204.84
156714	\$ 2,436.97
157933	\$ 1,625.34
157967	\$ 929.01
157995	\$ 24,851.89
158765	\$ 538.86
159639	\$ 433.78
160625	\$ 8,530.43
161630	\$ 1,215.06
162667	\$ 9,696.28
163191	\$ 159.68
163228	\$ 4,125.04
163263	\$ 1,592.30
164352	\$ 1,712.18
165149	\$ 160.69
165465	\$ 1,184.71
166853	\$ 3,434.56
168439	\$ 4,905.67
169176	\$ 127.14
170866	\$ 1,549.57
171505	\$ 436.25
171546	\$ 19,738.74
171616	\$ 1,959.02
172159	\$ 136.80
172219	\$ 128.32
173059	\$ 203.00
173219	\$ 2,099.59
173305	\$ 904.24
208752	\$ 3,882.93
209167	\$ 7,503.06
209431	\$ 627.83
209468	\$ 262.25
209544	\$ 327.96
209730	\$ 3,530.01
210183	\$ 127.56
210299	\$ 3,852.50
210537	\$ 2,803.85
210992	\$ 560.00
211026	\$ 1,475.58
211447	\$ 22,030.35
211574	\$ 870.57
211605	\$ 1,093.18
211637	\$ 6,735.20
211662	\$ 807.55
211694	\$ 9,990.60
211777	\$ 6,677.37

Customer	Restitution Amount
631076	\$ 59.54
631257	\$ 389.76
631377	\$ 1,723.99
631510	\$ 390.56
631550	\$ 1,321.00
631607	\$ 189.73
631727	\$ 1,897.46
631805	\$ 114.21
632014	\$ 2,461.17
632130	\$ 544.17
632157	\$ 343.86
632383	\$ 1,099.06
632477	\$ 710.86
632647	\$ 265.11
632764	\$ 3,783.84
632841	\$ 728.11
632944	\$ 1,239.25
632969	\$ 7,457.68
633154	\$ 304.30
633318	\$ 2,143.14
633347	\$ 23,133.19
633369	\$ 1,284.23
633577	\$ 2,575.18
633607	\$ 297.98
633666	\$ 4,426.80
633811	\$ 6,795.60
633879	\$ 5,739.82
633904	\$ 5,211.60
633941	\$ 1,020.00
634025	\$ 17,582.94
634249	\$ 1,942.33
634278	\$ 1,549.70
634360	\$ 3,280.00
634430	\$ 933.84
634797	\$ 5,039.08
634950	\$ 2,440.86
635218	\$ 1,882.33
635244	\$ 154.30
635271	\$ 70.84
635323	\$ 19,519.44
635440	\$ 109.48
635981	\$ 2,060.12
636012	\$ 2,326.03
636129	\$ 5,256.66
636163	\$ 13,814.72
636268	\$ 3,365.60
636311	\$ 2,571.83
636374	\$ 26,656.45

Customer	Restitution Amount
680220	\$ 1,452.19
680266	\$ 1,118.82
680472	\$ 434.56
680503	\$ 744.21
680534	\$ 993.71
680734	\$ 1,625.93
681248	\$ 1,226.81
681539	\$ 1,006.55
681629	\$ 160.78
681951	\$ 575.73
682273	\$ 2,133.62
682323	\$ 433.87
682531	\$ 1,168.18
682632	\$ 418.57
682664	\$ 95.03
682762	\$ 7,493.42
682940	\$ 1,140.00
683118	\$ 8,319.24
683294	\$ 447.00
683482	\$ 4,221.65
683671	\$ 829.83
684014	\$ 2,623.63
684125	\$ 6,605.54
684171	\$ 952.50
684547	\$ 473.95
684582	\$ 1,234.94
684888	\$ 8,391.91
685125	\$ 402.31
685346	\$ 461.05
685566	\$ 1,546.87
686166	\$ 707.28
686332	\$ 3,027.33
686431	\$ 3,493.65
686622	\$ 291.95
686784	\$ 11,585.00
686839	\$ 2,111.71
686909	\$ 983.55
687105	\$ 4,327.48
687253	\$ 7,006.37
687315	\$ 313.70
687356	\$ 255.19
687902	\$ 611.74
687963	\$ 2,250.19
687996	\$ 956.18
688126	\$ 3,672.28
688248	\$ 1,280.26
689441	\$ 747.39
689496	\$ 2,438.51

Attachment A

Customer	Restitution Amount
211884	\$ 5,215.83
212079	\$ 3,631.69
212229	\$ 31.42
212419	\$ 59.93
212644	\$ 800.82
212822	\$ 987.50
213034	\$ 1,588.50
213063	\$ 438.85
213125	\$ 499.33
213262	\$ 3,266.04
213599	\$ 1,097.35
213633	\$ 225.00
213798	\$ 2,712.07
213822	\$ 13,445.63
214227	\$ 2,750.50
214418	\$ 6,472.04
214789	\$ 4,096.16
214918	\$ 3,119.33
215076	\$ 3,518.51
215104	\$ 521.39
215135	\$ 916.24
215166	\$ 45.25
215375	\$ 3,607.18
215497	\$ 2,205.63
215586	\$ 2,102.83
215685	\$ 1,109.14
215743	\$ 225.00
215865	\$ 1,104.12
216005	\$ 11,983.00
216066	\$ 2,037.64
586729	\$ 4,718.64
588296	\$ 2,560.30
589113	\$ 2,529.96
590095	\$ 415.76
590225	\$ 936.27
590835	\$ 156.94
590941	\$ 1,241.94
591050	\$ 1,932.70
592241	\$ 1,134.68
592299	\$ 6,767.95
593276	\$ 5,500.21
593308	\$ 2,158.09
593641	\$ 3,292.47
593865	\$ 1,040.27
593889	\$ 1,882.88
593942	\$ 274.81
594173	\$ 2,474.50
594205	\$ 1,753.25

Customer	Restitution Amount
636416	\$ 138.31
636479	\$ 15.55
636565	\$ 481.53
636617	\$ 2,876.29
636683	\$ 615.78
636746	\$ 99.89
636893	\$ 330.30
636971	\$ 252.92
637007	\$ 69.41
637064	\$ 1,551.46
637131	\$ 306.91
637324	\$ 228.78
637347	\$ 1,000.00
637376	\$ 502.12
637501	\$ 17,267.73
637575	\$ 345.36
637703	\$ 1,608.85
637731	\$ 7,030.26
637762	\$ 19,334.81
637793	\$ 382.00
637919	\$ 1,387.73
637950	\$ 3,559.36
638100	\$ 7,783.37
638323	\$ 19,496.80
638507	\$ 1,212.52
638628	\$ 6,807.20
638780	\$ 5,755.47
638923	\$ 1,841.35
639003	\$ 1,211.95
639204	\$ 8,000.00
639270	\$ 2,982.13
639391	\$ 133.19
639424	\$ 130.57
639457	\$ 294.11
639654	\$ 3,825.61
639688	\$ 3,128.94
639870	\$ 535.93
639969	\$ 175.59
640032	\$ 6,164.51
640109	\$ 1,089.27
640134	\$ 16,282.06
640207	\$ 17,602.27
640280	\$ 3,634.03
640436	\$ 338.03
640558	\$ 3,467.08
640583	\$ 413.93
640694	\$ 2,268.31
640720	\$ 194.24

Customer	Restitution Amount
689629	\$ 4,142.53
689906	\$ 5,520.00
689930	\$ 7,500.00
690084	\$ 1,340.15
690266	\$ 3,149.78
690291	\$ 934.80
690321	\$ 540.62
690378	\$ 2,192.23
690428	\$ 3,776.40
690504	\$ 209.77
690876	\$ 2,103.31
691129	\$ 205.92
691160	\$ 249.05
691419	\$ 660.04
691446	\$ 19,789.15
691699	\$ 3,138.38
691724	\$ 8,519.22
691818	\$ 4,412.69
691852	\$ 5,827.77
691869	\$ 187.69
691922	\$ 1,200.00
692151	\$ 1,620.82
692373	\$ 1,440.00
692524	\$ 2,744.00
693241	\$ 78.80
693472	\$ 3,867.12
694011	\$ 12,578.81
694075	\$ 3,216.74
694171	\$ 1,366.94
694849	\$ 797.78
694905	\$ 1,823.64
695275	\$ 2,506.30
695484	\$ 4,535.96
695608	\$ 3,089.53
695758	\$ 2,706.48
695801	\$ 9,742.25
696357	\$ 3,720.00
696588	\$ 435.44
696619	\$ 95.13
697038	\$ 3,930.00
697174	\$ 1,136.20
697267	\$ 57.13
697310	\$ 1,110.82
697340	\$ 1,243.00
697768	\$ 3,082.77
698150	\$ 582.97
698248	\$ 3,655.87
698745	\$ 597.34

Attachment A

Customer	Restitution Amount
594287	\$ 117.31
594394	\$ 1,711.90
594503	\$ 520.00
595389	\$ 1,148.07
595424	\$ 34.21
595591	\$ 7,485.26
595669	\$ 5,521.03
595808	\$ 8,125.31
595868	\$ 6,219.74
595946	\$ 1,734.74
596219	\$ 577.67
596360	\$ 3,000.00
596433	\$ 6,800.40
596660	\$ 5,057.07
596944	\$ 641.30
596969	\$ 1,311.39
597155	\$ 520.00
597195	\$ 14,306.34
597221	\$ 1,500.67
597286	\$ 2,163.66
597342	\$ 207.01
597574	\$ 55,629.55
597602	\$ 1,350.02
597651	\$ 1,713.17
597788	\$ 9,458.00
598052	\$ 2,729.23
598113	\$ 1,408.84
598143	\$ 4,126.69
598212	\$ 1,146.00
598239	\$ 500.00
598358	\$ 12,000.00
598541	\$ 2,734.46
598830	\$ 65.00
598857	\$ 312.52
598890	\$ 8,816.00
599095	\$ 1,367.59
599124	\$ 509.17
599309	\$ 1,986.92
599626	\$ 2,245.01
599646	\$ 467.71
599679	\$ 787.23
599793	\$ 7,708.07
599852	\$ 335.80
600001	\$ 844.93
600179	\$ 722.45
600285	\$ 1,294.76
600311	\$ 888.89
600474	\$ 3,369.26

Customer	Restitution Amount
640985	\$ 496.78
641246	\$ 3,904.89
641304	\$ 820.02
641329	\$ 1,444.62
641648	\$ 1,259.80
641699	\$ 1,413.85
641747	\$ 1,885.04
641771	\$ 289.50
641796	\$ 24.00
642048	\$ 998.44
642138	\$ 5,133.86
642220	\$ 1,247.21
642243	\$ 1,005.87
642265	\$ 1,839.48
642291	\$ 1,779.46
642384	\$ 3,517.48
642436	\$ 99.33
642564	\$ 406.58
642709	\$ 9,874.41
642751	\$ 969.12
642989	\$ 2,948.81
643023	\$ 866.40
643048	\$ 23,513.17
643141	\$ 4,871.67
643175	\$ 96.92
643257	\$ 9,717.25
643375	\$ 945.46
643409	\$ 14.73
643449	\$ 4,789.09
643644	\$ 263.24
643806	\$ 6,828.99
643888	\$ 1,888.31
644061	\$ 1,132.37
644109	\$ 3,489.09
644246	\$ 190.27
644447	\$ 219.07
644472	\$ 59.33
644758	\$ 1,648.74
644796	\$ 316.15
644889	\$ 89.65
644921	\$ 1,574.54
645075	\$ 2,191.65
645142	\$ 596.84
645332	\$ 4,946.12
645426	\$ 2,750.79
645625	\$ 663.77
645722	\$ 2,654.65
645908	\$ 1,463.50

Customer	Restitution Amount
698771	\$ 311.98
698860	\$ 204.46
698899	\$ 1,663.23
698999	\$ 51.25
699058	\$ 843.26
699171	\$ 130.95
699215	\$ 414.69
699448	\$ 6,061.52
699671	\$ 331.40
699739	\$ 275.78
699908	\$ 2,140.84
700013	\$ 5,509.10
700356	\$ 35.04
700405	\$ 55.34
700484	\$ 945.00
700518	\$ 5,031.44
700906	\$ 409.36
701112	\$ 898.60
701419	\$ 1,082.57
701475	\$ 595.61
701745	\$ 179.63
702058	\$ 3,602.95
702090	\$ 2,917.60
702392	\$ 424.48
702423	\$ 4,027.33
702485	\$ 2,785.35
703898	\$ 922.54
703918	\$ 1,320.25
704576	\$ 8,466.88
704601	\$ 201.49
704734	\$ 3,889.03
704858	\$ 631.27
704952	\$ 1,221.58
705122	\$ 2,157.23
705246	\$ 869.76
705354	\$ 6,266.00
705489	\$ 430.56
705551	\$ 5,061.76
705581	\$ 323.47
705853	\$ 634.71
705915	\$ 258.55
705940	\$ 4,185.58
706165	\$ 1,388.47
706320	\$ 200.00
706525	\$ 1,778.49
706584	\$ 731.67
706640	\$ 384.90
706668	\$ 226.68

Attachment A

Customer	Restitution Amount
600506	\$ 722.65
600540	\$ 742.90
601009	\$ 5,663.19
601659	\$ 8,724.32
601795	\$ 487.99
601823	\$ 613.68
601965	\$ 1,373.38
602125	\$ 1,877.72
602176	\$ 4,000.00
602360	\$ 485.37
602648	\$ 736.27
602778	\$ 152.92
602964	\$ 1,250.22
603067	\$ 6,630.00
603126	\$ 318.00
603355	\$ 607.33
603414	\$ 2,079.25
603440	\$ 2,564.81
603686	\$ 12,085.12
603972	\$ 879.17
604261	\$ 387.41
604332	\$ 850.70
604372	\$ 783.85
604485	\$ 1,117.68
604595	\$ 20,782.66
604622	\$ 1,326.02
604925	\$ 1,306.51
605043	\$ 5,059.13
605124	\$ 362.85
605227	\$ 2,160.48
605353	\$ 426.99
605440	\$ 213.69
605524	\$ 350.65
605574	\$ 4,448.14
605666	\$ 4,485.63
605697	\$ 339.58
605730	\$ 5,985.97
605863	\$ 2,369.53
605941	\$ 5,346.50
605965	\$ 7,637.86
606016	\$ 3,862.77
606093	\$ 578.56
606157	\$ 375.57
606250	\$ 1,270.00
606287	\$ 20,181.05
606422	\$ 989.87
606694	\$ 933.41
606725	\$ 1,317.07

Customer	Restitution Amount
646051	\$ 413.36
646106	\$ 1,239.96
646135	\$ 1,548.01
646161	\$ 1,136.74
646230	\$ 9,021.85
646323	\$ 557.90
646376	\$ 2,906.25
646427	\$ 8,550.00
646452	\$ 7,070.07
646513	\$ 2,073.38
646648	\$ 1,186.26
646680	\$ 321.60
646706	\$ 851.27
646998	\$ 2,135.14
647295	\$ 9,228.18
647430	\$ 3,087.68
647460	\$ 5,548.27
647632	\$ 500.08
648290	\$ 246.04
648318	\$ 588.08
648688	\$ 7,039.59
648742	\$ 450.00
648768	\$ 400.00
649069	\$ 249.44
649149	\$ 1,092.61
649199	\$ 3,031.30
649323	\$ 104.69
649541	\$ 2,709.44
649653	\$ 1,404.10
649775	\$ 10,469.99
649808	\$ 3,298.44
649833	\$ 25,155.23
649976	\$ 3,329.46
650004	\$ 543.67
650169	\$ 5,555.58
650249	\$ 702.74
650275	\$ 141.67
650300	\$ 11,200.00
650362	\$ 240.90
650585	\$ 254.41
650699	\$ 1,522.75
650723	\$ 2,064.60
650833	\$ 556.47
650866	\$ 732.89
650957	\$ 604.78
651093	\$ 9,412.86
651305	\$ 451.50
651333	\$ 289.63

Customer	Restitution Amount
706726	\$ 4,599.04
706797	\$ 1,413.02
706814	\$ 287.87
707482	\$ 3,391.85
707511	\$ 1,517.82
707655	\$ 2,700.00
707696	\$ 232.33
708334	\$ 4,903.19
708468	\$ 624.83
708789	\$ 232.00
709041	\$ 26,499.81
709322	\$ 956.77
709615	\$ 5,231.26
710187	\$ 684.26
710217	\$ 3,932.64
710519	\$ 800.00
710709	\$ 6,728.66
710733	\$ 919.55
710798	\$ 1,203.34
711086	\$ 190.47
711269	\$ 1,760.00
711345	\$ 684.42
711548	\$ 311.17
711931	\$ 1,841.01
712257	\$ 1,929.34
712296	\$ 2,927.25
712565	\$ 318.02
712589	\$ 1,513.74
712788	\$ 522.85
712883	\$ 2,002.85
713074	\$ 303.85
713400	\$ 1,572.24
713762	\$ 16.08
713819	\$ 1,080.00
713852	\$ 1,475.24
714126	\$ 933.85
714381	\$ 1,174.27
714512	\$ 2,390.00
714647	\$ 3,568.30
715490	\$ 773.33
715571	\$ 3,780.00
715620	\$ 2,770.61
715698	\$ 492.64
715753	\$ 45.98
715868	\$ 676.47
716141	\$ 3,685.45
716557	\$ 576.45
716597	\$ 324.85

Attachment A

Customer	Restitution Amount
606794	\$ 215.74
606969	\$ 2,055.43
607021	\$ 264.43
607215	\$ 797.61
607285	\$ 240.00
607314	\$ 440.00
607423	\$ 394.37
607452	\$ 394.37
607552	\$ 344.02
607762	\$ 810.22
607865	\$ 1,800.00
607979	\$ 1,198.73
608008	\$ 2,351.66
608037	\$ 908.01
608068	\$ 4,474.18
608264	\$ 5,104.82
608337	\$ 480.27
608398	\$ 456.60
608434	\$ 124.98
608456	\$ 296.25
608478	\$ 359.52
608543	\$ 554.46

Customer	Restitution Amount
651397	\$ 149.26
651428	\$ 697.48
651493	\$ 1,272.90
651836	\$ 210.62
652024	\$ 751.48
652159	\$ 1,030.39
652227	\$ 277.90
652311	\$ 1,127.98
652341	\$ 986.79
652482	\$ 1,198.78
652592	\$ 4,675.17
652685	\$ 3,449.33
652715	\$ 722.05
652843	\$ 130.00
653014	\$ 1,618.24
653115	\$ 1,700.88
653185	\$ 752.31
653211	\$ 4,230.45
653508	\$ 584.05
653599	\$ 292.37
653664	\$ 309.18
653712	\$ 654.05

Customer	Restitution Amount
716756	\$ 1,381.05
717469	\$ 252.02
717585	\$ 8,877.59
717654	\$ 231.61
717993	\$ 480.60
718193	\$ 1,161.44
718307	\$ 2,604.45
718346	\$ 1,170.00
718871	\$ 5,857.57
718899	\$ 11,855.63
719068	\$ 357.41
719103	\$ 407.45
719211	\$ 834.60
719286	\$ 3,300.00
719440	\$ 3,914.67
719511	\$ 1,083.81
720172	\$ 187.29
720325	\$ 542.96
720842	\$ 1,411.69
P****e, J.	\$ 4,526.78
P****e, R.	\$ 11,071.64
W****r, S.	\$ 3,885.50

TOTAL RESTITUTION AMOUNT**\$ 3,594,754.49**

Attachment B

Customer	Restitution Amount (before interest)
A***D, D***D	\$ 277.26
A***E, E***I	\$ 234.53
A***E, S***N	\$ 239.18
A***E, T***S	\$ 264.77
A***G, A***M	\$ 326.26
A***G, K***N	\$ 979.17
A***H, H***T	\$ 78.53
A***H, M***N	\$ 72.83
A***I, A***	\$ 727.54
A***I, A***N	\$ 89.94
A***I, C***S	\$ 401.24
A***I, J***T	\$ 198.68
A***I, S***A	\$ 252.19
A***I, S***M	\$ 793.75
A***N, C***	\$ 929.71
A***N, C***R	\$ 502.68
A***N, D***K	\$ 334.72
A***N, K***Y	\$ 329.71
A***N, S***	\$ 111.94
A***O, A***N	\$ 262.54
A***O, C***S	\$ 107.07
A***O, I***E	\$ 356.84
A***R, L***S	\$ 234.04
A***R, M***D	\$ 405.28
A***R, T***Y	\$ 320.20
A***S, C***N	\$ 246.99
A***S, J***L	\$ 98.00
A***S, J***N	\$ 187.54
A***S, S***N	\$ 78.60
A***T, C***N	\$ 261.51
A***X, S***A	\$ 138.17
A***Y, D***K	\$ 584.41
B***A, H***A	\$ 75.67
B***A, J***Y	\$ 141.60
B***A, N***S	\$ 96.92
B***D, A***Y	\$ 156.37
B***D, B***O	\$ 641.39
B***D, J***R	\$ 75.09
B***D, K***N	\$ 99.41
B***D, K***N	\$ 74.83
B***D, M***A	\$ 532.25
B***D, R***Y	\$ 375.02
B***D, S***N	\$ 575.81
B***E, A***A	\$ 343.59
B***E, B***N	\$ 77.49
B***E, C***S	\$ 99.39
B***E, E***N	\$ 333.13
B***E, R***X	\$ 178.51

Customer	Restitution Amount (before interest)
K***Z, A***A	\$ 620.22
K***Z, D***A	\$ 251.51
K***Z, L***A	\$ 292.62
L***D, D***D	\$ 234.11
L***D, M***L	\$ 121.86
L***E, C***G	\$ 159.74
L***E, C***L	\$ 94.14
L***E, D***	\$ 344.78
L***E, D***D	\$ 257.98
L***E, G***E	\$ 1,313.52
L***E, L***I	\$ 668.64
L***E, S***F	\$ 261.90
L***E, S***L	\$ 631.50
L***E, V***M	\$ 4,254.32
L***E, W***E	\$ 116.34
L***G, T***S	\$ 285.05
L***I, J***N	\$ 494.22
L***I, L***A	\$ 87.49
L***I, M***N	\$ 251.35
L***I, N***J	\$ 172.48
L***I, T***O	\$ 576.05
L***K, A***	\$ 105.19
L***L, P***K	\$ 2,145.83
L***M, K***Y	\$ 372.77
L***M, S***Y	\$ 84.16
L***N, E***H	\$ 125.39
L***N, R***N	\$ 346.55
L***O, A***E	\$ 137.53
L***O, J***H	\$ 125.79
L***O, R***R	\$ 160.80
L***R, C***A	\$ 165.99
L***R, R***N	\$ 96.14
L***S, A***	\$ 658.47
L***S, C***D	\$ 289.94
L***S, D***D	\$ 881.15
L***S, J***R	\$ 159.49
L***S, J***Y	\$ 89.71
L***S, S***E	\$ 134.49
L***S, W***E	\$ 810.34
L***T, T***G	\$ 158.39
L***T, W***M	\$ 182.94
L***U, C***G	\$ 226.24
L***U, M***S	\$ 293.03
L***Y, B***H	\$ 110.57
L***Y, S***E	\$ 986.82
L***Z, D***N	\$ 209.53
L***Z, M***A	\$ 89.75
M***A, A***M	\$ 72.37

Attachment B

Customer	Restitution Amount (before interest)
B***E, V***R	\$ 248.93
B***F, V***A	\$ 232.84
B***G, A***L	\$ 262.81
B***G, D***A	\$ 281.82
B***G, K***H	\$ 272.18
B***G, S***Y	\$ 205.22
B***H, C***	\$ 356.30
B***K, C***E	\$ 91.01
B***K, C***R	\$ 343.89
B***K, J***H	\$ 136.13
B***K, K***E	\$ 118.49
B***K, M***A	\$ 272.03
B***K, T***Y	\$ 191.21
B***L, D***D	\$ 678.18
B***L, D***D	\$ 99.87
B***L, E***H	\$ 234.35
B***L, J***N	\$ 204.26
B***L, L***H	\$ 266.95
B***L, R***R	\$ 189.92
B***L, T***S	\$ 220.33
B***M, K***N	\$ 796.38
B***N, B***	\$ 243.47
B***N, B***N	\$ 1,553.80
B***N, C***E	\$ 90.61
B***N, C***N	\$ 786.00
B***N, C***R	\$ 75.52
B***N, D***	\$ 277.74
B***N, D***A	\$ 431.59
B***N, E***R	\$ 918.99
B***N, F***N	\$ 753.73
B***N, K***S	\$ 161.09
B***N, K***Y	\$ 94.32
B***N, M***Y	\$ 86.70
B***N, M***Y	\$ 89.89
B***N, N***L	\$ 108.93
B***N, S***N	\$ 420.64
B***O, H***I	\$ 211.70
B***O, K***N	\$ 262.72
B***P, J***N	\$ 402.98
B***P, J***Y	\$ 235.49
B***R, A***W	\$ 441.01
B***R, B***E	\$ 488.07
B***R, B***H	\$ 338.03
B***R, B***N	\$ 251.50
B***R, B***N	\$ 387.28
B***R, G***I	\$ 102.08
B***R, J***Y	\$ 77.77
B***R, K***I	\$ 123.30

Customer	Restitution Amount (before interest)
M***A, F***A	\$ 78.39
M***A, M***A	\$ 154.93
M***A, P***L	\$ 106.74
M***D, K***Y	\$ 537.16
M***D, M***E	\$ 87.30
M***E, C***	\$ 363.21
M***E, D***S	\$ 119.33
M***E, J***E	\$ 188.31
M***E, J***E	\$ 284.66
M***E, K***N	\$ 433.98
M***E, P***A	\$ 464.75
M***E, T***M	\$ 381.59
M***E, T***Y	\$ 515.40
M***E, V***A	\$ 85.06
M***G, B***	\$ 3,425.39
M***I, E***H	\$ 130.16
M***L, P***O	\$ 130.33
M***L, R***T	\$ 774.19
M***L, T***A	\$ 505.37
M***L, W***T	\$ 377.22
M***M, B***	\$ 1,007.01
M***M, J***A	\$ 460.99
M***N, A***	\$ 375.04
M***N, A***Y	\$ 222.39
M***N, B***N	\$ 1,864.05
M***N, B***T	\$ 143.38
M***N, B***Y	\$ 247.03
M***N, C***R	\$ 577.64
M***N, E***C	\$ 816.31
M***N, E***D	\$ 493.55
M***N, J***E	\$ 497.31
M***N, J***Y	\$ 163.56
M***N, K***A	\$ 81.75
M***N, M***E	\$ 434.88
M***N, R***E	\$ 115.59
M***N, T***	\$ 360.74
M***N, T***D	\$ 262.09
M***O, E***Y	\$ 84.94
M***R, A***N	\$ 1,035.83
M***R, C***A	\$ 260.37
M***R, C***G	\$ 623.75
M***R, D***D	\$ 206.73
M***R, H***Y	\$ 647.74
M***R, J***E	\$ 244.97
M***R, J***H	\$ 316.04
M***R, J***R	\$ 167.52
M***R, J***S	\$ 72.59
M***R, L***Y	\$ 112.41

Attachment B

Customer	Restitution Amount (before interest)
B***R, L***E	\$ 132.18
B***R, M***A	\$ 1,937.84
B***R, M***A	\$ 118.76
B***R, P***P	\$ 171.24
B***R, R***K	\$ 162.11
B***R, R***N	\$ 97.72
B***R, R***N	\$ 169.04
B***R, R***T	\$ 1,159.52
B***S, J***	\$ 136.80
B***S, L***	\$ 84.55
B***S, M***L	\$ 1,001.40
B***S, R***D	\$ 118.56
B***S, R***L	\$ 165.17
B***S, R***M	\$ 827.56
B***S, R***O	\$ 125.76
B***S, S***E	\$ 297.92
B***S, S***N	\$ 83.71
B***T, G***D	\$ 176.82
B***T, J***N	\$ 370.89
B***T, J***R	\$ 3,369.53
B***T, T***Y	\$ 631.33
B***W, C***Y	\$ 239.09
B***W, N***S	\$ 134.00
B***Y, B***	\$ 105.82
C***D, J***N	\$ 86.13
C***D, K***Y	\$ 94.85
C***D, S***N	\$ 387.87
C***E, B***N	\$ 215.51
C***E, E***A	\$ 87.68
C***E, J***H	\$ 328.03
C***E, R***T	\$ 178.50
C***E, T***	\$ 321.78
C***E, T***S	\$ 526.23
C***G, C***S	\$ 2,215.67
C***G, H***Y	\$ 99.07
C***G, L***A	\$ 144.77
C***I, C***A	\$ 216.14
C***I, C***G	\$ 2,352.12
C***I, R***D	\$ 114.67
C***K, C***S	\$ 263.99
C***K, H***D	\$ 613.56
C***K, J***T	\$ 745.15
C***K, K***N	\$ 90.86
C***K, L***A	\$ 79.14
C***K, S***L	\$ 729.00
C***K, S***N	\$ 836.26
C***L, B***A	\$ 99.97
C***L, M***H	\$ 81.32

Customer	Restitution Amount (before interest)
M***R, M***M	\$ 73.04
M***R, R***D	\$ 164.16
M***R, R***D	\$ 95.00
M***R, T***A	\$ 390.29
M***R, W***M	\$ 99.84
M***S, B***B	\$ 281.25
M***S, B***L	\$ 472.42
M***S, C***R	\$ 405.77
M***S, J***D	\$ 102.01
M***S, L***A	\$ 400.05
M***S, L***A	\$ 163.41
M***S, R***N	\$ 75.64
M***S, R***N	\$ 1,052.39
M***T, K***Y	\$ 77.15
M***Z, J***N	\$ 212.67
N***A, D***E	\$ 174.94
N***D, R***E	\$ 73.10
N***F, A***	\$ 299.00
N***F, T***A	\$ 80.57
N***H, L***E	\$ 1,841.80
N***I, N***N	\$ 4,431.74
N***L, C***Y	\$ 99.65
N***L, H***B	\$ 483.32
N***N, A***L	\$ 708.94
N***N, C***E	\$ 71.96
N***N, C***I	\$ 483.67
N***N, K***H	\$ 1,499.41
N***N, K***H	\$ 191.18
N***N, K***N	\$ 110.88
N***N, L***M	\$ 839.74
N***N, R***T	\$ 333.78
N***R, J***H	\$ 668.99
N***R, J***S	\$ 1,334.34
N***R, J***Y	\$ 291.72
N***R, R***R	\$ 165.44
N***R, R***R	\$ 134.38
N***R, R***R	\$ 88.34
N***Y, D***D	\$ 415.14
N***Z, S***A	\$ 255.47
O***A, S***A	\$ 290.68
O***E, S***E	\$ 228.72
O***G, R***Y	\$ 84.68
O***H, E***D	\$ 216.13
O***I, L***N	\$ 83.46
O***K, A***Y	\$ 121.86
O***K, L***A	\$ 146.65
O***N, D***A	\$ 167.12
O***N, J***T	\$ 351.56

Attachment B

Customer	Restitution Amount (before interest)
C***L, M***K	\$ 234.56
C***L, N***L	\$ 204.91
C***N, C***D	\$ 91.32
C***N, D***D	\$ 1,128.61
C***N, D***L	\$ 231.25
C***N, J***E	\$ 511.09
C***N, J***E	\$ 143.61
C***N, J***S	\$ 74.41
C***N, J***S	\$ 731.65
C***N, K***N	\$ 215.36
C***N, M***L	\$ 91.77
C***N, M***W	\$ 82.44
C***N, M***Y	\$ 445.65
C***N, M***Z	\$ 79.90
C***O, S***N	\$ 442.40
C***N, S***N	\$ 269.65
C***O, M***E	\$ 1,819.91
C***O, S***A	\$ 274.03
C***O, S***N	\$ 1,007.03
C***O, T***Y	\$ 359.32
C***P, R***E	\$ 183.63
C***R, B***A	\$ 1,016.28
C***R, J***T	\$ 99.11
C***R, R***T	\$ 380.52
C***R, W***M	\$ 636.67
C***S, C***S	\$ 104.99
C***S, L***A	\$ 84.35
C***S, S***E	\$ 147.36
C***S, S***E	\$ 123.99
C***U, S***L	\$ 723.10
C***W, L***Y	\$ 124.12
C***Y, A***C	\$ 240.26
C***Y, D***N	\$ 877.62
C***Y, M***W	\$ 248.54
C***Y, R***A	\$ 1,612.35
D***A, J***A	\$ 527.33
D***D, B***E	\$ 975.18
D***D, D***W	\$ 168.96
D***D, L***Y	\$ 274.84
D***D, M***W	\$ 266.74
D***D, S***T	\$ 191.89
D***E, L***E	\$ 73.47
D***K, R***A	\$ 221.23
D***L, E***C	\$ 1,330.43
D***M, A***E	\$ 183.90
D***N, G***Y	\$ 747.06
D***N, J***S	\$ 490.90
D***N, M***Y	\$ 276.71

Customer	Restitution Amount (before interest)
O***N, J***Y	\$ 269.56
O***N, W***A	\$ 1,011.59
O***O, B***T	\$ 115.37
O***R, M***Y	\$ 324.93
O***S, R***T	\$ 984.71
O***V, A***R	\$ 317.38
O***X, V***R	\$ 133.22
P***A, C***A	\$ 73.53
P***A, P***L	\$ 260.95
P***E, C***E	\$ 241.35
P***E, J***S	\$ 162.28
P***E, N***	\$ 88.62
P***E, N***	\$ 90.33
P***E, S***E	\$ 1,308.85
P***E, T***D	\$ 237.30
P***E, W***M	\$ 767.06
P***I, K***N	\$ 86.00
P***I, M***L	\$ 416.17
P***I, R***R	\$ 884.76
P***K, B***N	\$ 478.42
P***K, B***N	\$ 393.23
P***K, M***N	\$ 124.03
P***L, D***D	\$ 132.10
P***N, B***Y	\$ 82.69
P***N, G***T	\$ 479.55
P***N, K***M	\$ 905.29
P***N, M***I	\$ 94.14
P***O, C***R	\$ 1,643.79
P***R, C***Y	\$ 216.35
P***R, D***N	\$ 293.28
P***R, K***Y	\$ 151.89
P***R, L***N	\$ 125.20
P***R, M***A	\$ 145.29
P***R, M***L	\$ 211.55
P***S, C***N	\$ 210.03
P***S, R***A	\$ 396.23
P***T, M***W	\$ 471.99
P***T, R***A	\$ 139.17
P***Z, O***R	\$ 104.05
R***A, D***E	\$ 267.26
R***D, G***Y	\$ 84.21
R***E, C***A	\$ 522.32
R***E, S***T	\$ 93.69
R***G, R***N	\$ 176.57
R***H, M***	\$ 145.23
R***I, R***D	\$ 209.65
R***I, T***N	\$ 110.92
R***K, P***A	\$ 446.56

Attachment B

Customer	Restitution Amount (before interest)
D***N, N***E	\$ 242.54
D***N, R***L	\$ 87.97
D***N, S***N	\$ 556.90
D***N, T***A	\$ 252.65
D***O, E***R	\$ 351.81
D***O, S***N	\$ 125.18
D***P, C***G	\$ 501.29
D***S, A***A	\$ 411.43
D***S, G***G	\$ 143.85
D***S, M***K	\$ 197.96
D***S, M***L	\$ 400.01
D***S, P***A	\$ 598.28
D***T, C***	\$ 207.76
D***U, L***C	\$ 179.45
D***Y, E***D	\$ 172.56
D***Y, K***N	\$ 350.27
D***Y, S***A	\$ 104.65
D***Z, S***T	\$ 191.28
E***H, C***S	\$ 261.41
E***I, E***D	\$ 90.69
E***K, A***	\$ 279.10
E***M, M***L	\$ 2,030.98
E***N, B***A	\$ 234.20
E***N, C***G	\$ 318.35
E***N, R***N	\$ 346.18
E***R, S***Y	\$ 285.40
E***S, B***N	\$ 323.56
E***S, L***E	\$ 145.12
E***T, B***E	\$ 417.17
E***T, C***N	\$ 97.41
E***T, D***M	\$ 801.79
E***T, M***Y	\$ 290.30
E***T, R***M	\$ 164.30
E***T, R***T	\$ 96.64
E***Y, K***N	\$ 531.06
F***A, B***Y	\$ 924.55
F***A, C***E	\$ 90.60
F***A, F***O	\$ 770.42
F***A, G***O	\$ 366.47
F***E, M***A	\$ 77.76
F***E, T***E	\$ 97.94
F***H, E***E	\$ 95.34
F***L, C***S	\$ 489.53
F***L, F***J	\$ 275.82
F***N, B***Y	\$ 594.01
F***N, K***N	\$ 97.65
F***N, S***H	\$ 273.75
F***N, S***Y	\$ 98.72

Customer	Restitution Amount (before interest)
R***L, J***N	\$ 618.69
R***L, P***A	\$ 271.22
R***N, A***E	\$ 135.59
R***N, C***D	\$ 1,428.88
R***N, E***S	\$ 114.31
R***N, J***N	\$ 144.44
R***N, T***S	\$ 181.28
R***N, T***S	\$ 197.25
R***O, A***X	\$ 500.37
R***O, J***L	\$ 96.71
R***O, J***N	\$ 610.94
R***O, U***I	\$ 1,486.30
R***P, D***A	\$ 191.40
R***P, D***S	\$ 211.50
R***R, B***A	\$ 327.04
R***R, S***T	\$ 233.35
R***S, C***A	\$ 83.79
R***S, C***E	\$ 169.21
R***S, D***N	\$ 495.89
R***S, E***E	\$ 73.86
R***S, E***H	\$ 170.62
R***S, J***	\$ 260.79
R***T, T***A	\$ 75.97
R***Y, C***G	\$ 248.92
R***Y, M***L	\$ 1,892.91
R***Z, I***I	\$ 137.54
S***A, D***E	\$ 220.04
S***A, R***T	\$ 79.08
S***A, T***D	\$ 217.50
S***A, V***T	\$ 94.21
S***D, M***A	\$ 342.22
S***E, A***N	\$ 99.07
S***E, D***K	\$ 280.13
S***E, K***Y	\$ 741.26
S***E, M***K	\$ 175.05
S***E, S***E	\$ 214.86
S***F, K***	\$ 571.66
S***H, A***M	\$ 842.14
S***H, B***	\$ 88.54
S***H, B***A	\$ 767.10
S***H, B***N	\$ 89.13
S***H, B***N	\$ 90.41
S***H, C***D	\$ 581.76
S***H, H***E	\$ 72.77
S***H, J***N	\$ 193.26
S***H, J***R	\$ 247.72
S***H, J***T	\$ 411.59
S***H, L***R	\$ 808.38

Attachment B

Customer	Restitution Amount (before interest)
F***R, A***A	\$ 264.54
F***R, A***M	\$ 73.78
F***R, B***	\$ 359.40
F***R, C***A	\$ 283.36
F***R, C***G	\$ 450.95
F***R, M***A	\$ 139.12
F***R, S***L	\$ 197.69
F***R, T***A	\$ 279.92
F***R, W***M	\$ 305.83
F***R, W***M	\$ 79.24
F***S, A***N	\$ 454.37
F***S, C***A	\$ 72.29
F***S, H***Y	\$ 71.99
F***S, H***Y	\$ 71.99
F***S, S***	\$ 104.48
F***S, T***O	\$ 89.45
F***Y, J***N	\$ 371.29
F***Y, J***R	\$ 827.52
F***Y, S***E	\$ 76.83
F***Z, A***N	\$ 526.59
F***Z, D***S	\$ 327.76
G***A, J***E	\$ 148.50
G***D, M***U	\$ 884.27
G***E, J***Y	\$ 798.11
G***E, K***Y	\$ 1,177.10
G***E, W***M	\$ 192.41
G***E, W***Y	\$ 200.10
G***H, C***A	\$ 290.77
G***K, A***M	\$ 507.41
G***K, J***R	\$ 211.21
G***L, K***Y	\$ 556.42
G***L, W***M	\$ 955.31
G***M, D***T	\$ 233.79
G***M, M***Y	\$ 90.34
G***M, P***P	\$ 92.44
G***N, C***E	\$ 86.12
G***N, C***E	\$ 256.83
G***N, J***E	\$ 75.01
G***N, J***S	\$ 922.10
G***N, J***Y	\$ 123.16
G***N, K***Y	\$ 225.14
G***N, P***A	\$ 178.81
G***N, R***D	\$ 217.32
G***N, S***N	\$ 232.54
G***N, W***Y	\$ 81.67
G***O, J***N	\$ 451.50
G***O, S***A	\$ 171.53
G***O, X***O	\$ 4,122.89

Customer	Restitution Amount (before interest)
S***H, T***Y	\$ 228.63
S***I, J***E	\$ 1,388.03
S***K, E***L	\$ 464.29
S***K, K***H	\$ 921.27
S***K, T***A	\$ 130.85
S***K, V***A	\$ 71.92
S***L, J***N	\$ 207.33
S***L, K***N	\$ 157.64
S***L, R***N	\$ 99.22
S***M, D***L	\$ 470.01
S***N, A***N	\$ 79.00
S***N, C***L	\$ 222.62
S***N, D***	\$ 75.36
S***N, D***E	\$ 98.04
S***N, J***S	\$ 982.32
S***N, J***S	\$ 114.89
S***N, L***T	\$ 251.05
S***N, M***I	\$ 435.72
S***N, P***L	\$ 289.02
S***N, R***A	\$ 80.14
S***N, R***A	\$ 112.01
S***N, S***N	\$ 458.55
S***N, S***Y	\$ 143.53
S***N, T***Y	\$ 79.39
S***N, W***U	\$ 198.79
S***O, E***	\$ 1,042.58
S***O, J***R	\$ 187.16
S***O, P***N	\$ 622.01
S***O, P***R	\$ 562.49
S***O, R***E	\$ 174.71
S***R, A***Y	\$ 375.77
S***R, B***N	\$ 467.62
S***R, C***D	\$ 302.14
S***R, C***E	\$ 160.50
S***R, I***N	\$ 219.18
S***R, J***D	\$ 494.44
S***R, J***E	\$ 136.82
S***R, K***H	\$ 410.24
S***R, L***A	\$ 89.09
S***R, L***A	\$ 94.13
S***R, L***A	\$ 197.74
S***R, M***L	\$ 231.15
S***R, R***	\$ 162.21
S***R, R***D	\$ 284.79
S***R, R***E	\$ 420.46
S***R, S***N	\$ 394.04
S***S, A***A	\$ 212.13
S***S, C***E	\$ 374.10

Attachment B

Customer	Restitution Amount (before interest)
G***P, J***N	\$ 692.94
G***R, B***Y	\$ 163.33
G***R, J***H	\$ 85.20
G***R, M***Y	\$ 249.29
G***R, P***I	\$ 2,664.34
G***S, L***E	\$ 320.39
G***T, J***S	\$ 95.35
G***T, S***A	\$ 84.92
G***T, S***Y	\$ 260.83
G***V, W***Y	\$ 90.39
G***Y, J***A	\$ 631.14
G***Y, J***N	\$ 112.47
G***Y, M***L	\$ 178.88
G***Y, S***M	\$ 2,767.46
G***Y, S***Y	\$ 604.50
G***Z, N***S	\$ 217.80
G***Z, R***D	\$ 94.14
H***A, D***D	\$ 312.50
H***A, R***D	\$ 280.86
H***D, S***A	\$ 111.67
H***E, K***Y	\$ 250.72
H***G, G***Y	\$ 129.69
H***H, M***E	\$ 489.63
H***H, W***M	\$ 622.56
H***I, L***A	\$ 426.94
H***J, J***H	\$ 328.76
H***J, K***E	\$ 328.76
H***K, S***	\$ 170.85
H***K, S***Y	\$ 3,400.77
H***L, A***W	\$ 456.67
H***L, R***E	\$ 282.94
H***N, B***Y	\$ 700.52
H***N, D***D	\$ 205.25
H***N, D***E	\$ 1,092.54
H***N, H***E	\$ 733.54
H***N, J***E	\$ 377.24
H***N, J***N	\$ 124.49
H***N, L***N	\$ 110.59
H***N, M***E	\$ 485.57
H***N, S***E	\$ 167.64
H***N, S***H	\$ 388.70
H***N, S***N	\$ 74.65
H***N, S***N	\$ 94.18
H***N, S***R	\$ 1,254.23
H***R, A***	\$ 174.27
H***R, M***L	\$ 939.31
H***R, M***Y	\$ 155.14
H***R, P***A	\$ 399.91

Customer	Restitution Amount (before interest)
S***S, J***S	\$ 247.80
S***S, J***S	\$ 77.73
S***S, M***N	\$ 186.14
S***S, R***H	\$ 370.81
S***S, R***L	\$ 165.92
S***S, R***T	\$ 90.62
S***S, R***Y	\$ 74.30
S***S, S***H	\$ 166.15
S***S, T***Y	\$ 2,080.74
S***T, D***D	\$ 73.52
S***T, E***A	\$ 171.66
S***T, F***E	\$ 355.61
S***T, G***Y	\$ 193.35
S***T, J***N	\$ 168.61
S***T, K***E	\$ 124.30
S***T, N***E	\$ 320.89
S***W, G***	\$ 119.57
S***Y, L***A	\$ 151.06
S***Y, M***W	\$ 1,384.87
S***Z, M***A	\$ 508.65
S***Z, N***A	\$ 120.75
T***A, G***A	\$ 105.97
T***A, J***E	\$ 184.12
T***D, D***E	\$ 307.36
T***E, E***C	\$ 345.23
T***G, D***E	\$ 317.88
T***G, J***Y	\$ 321.48
T***G, W***E	\$ 247.15
T***H, M***A	\$ 332.56
T***M, C***D	\$ 463.97
T***M, T***M	\$ 152.59
T***N, A***Y	\$ 111.79
T***N, G***E	\$ 97.68
T***N, J***Q	\$ 133.83
T***N, J***S	\$ 216.38
T***N, M***I	\$ 858.08
T***N, T***S	\$ 138.70
T***N, W***Y	\$ 542.53
T***O, G***G	\$ 370.97
T***R, A***N	\$ 106.28
T***R, C***E	\$ 224.66
T***R, G***N	\$ 93.17
T***R, J***N	\$ 208.06
T***R, J***S	\$ 175.85
T***R, L***A	\$ 206.30
T***R, R***D	\$ 264.51
T***R, S***H	\$ 419.55
T***R, W***M	\$ 409.68

Attachment B

Customer	Restitution Amount (before interest)
H***S, B***N	\$ 644.56
H***S, C***E	\$ 426.66
H***S, C***S	\$ 258.98
H***S, D***Y	\$ 223.74
H***S, J***E	\$ 106.44
H***S, L***	\$ 778.24
H***S, M***Y	\$ 260.20
H***S, P***L	\$ 367.20
H***S, R***T	\$ 93.80
H***S, R***Y	\$ 214.57
H***T, A***	\$ 77.41
H***T, G***L	\$ 107.65
H***T, J***E	\$ 107.65
H***X, N***N	\$ 78.94
H***Y, A***A	\$ 238.39
H***Y, C***P	\$ 461.42
H***Y, D***N	\$ 347.54
H***Y, R***A	\$ 381.89
H***Y, T***T	\$ 287.20
H***Z, M***Y	\$ 74.38
H***Z, S***A	\$ 245.72
I***A, R***A	\$ 208.75
I***E, A***E	\$ 179.85
I***M, L***E	\$ 347.62
I***N, S***T	\$ 413.72
I***N, T***S	\$ 110.64
I***R, R***Y	\$ 97.03
J***B, K***N	\$ 158.36
J***B, P***L	\$ 1,144.14
J***E, H***	\$ 101.93
J***I, J***R	\$ 401.12
J***L, F***E	\$ 157.65
J***N, D***A	\$ 206.12
J***N, G***T	\$ 106.31
J***N, J***E	\$ 409.24
J***N, J***H	\$ 130.17
J***N, M***E	\$ 86.36
J***N, M***T	\$ 1,753.48
J***N, N***N	\$ 88.42
J***N, S***N	\$ 92.24
J***N, S***Y	\$ 106.31
J***Y, T***J	\$ 381.05
K***A, K***H	\$ 143.19
K***A, R***N	\$ 1,591.66
K***C, C***A	\$ 267.87
K***E, B***	\$ 298.45
K***E, C***L	\$ 199.25
K***E, P***K	\$ 72.61

Customer	Restitution Amount (before interest)
T***S, B***A	\$ 346.37
T***S, C***E	\$ 245.39
T***S, K***Y	\$ 234.81
T***T, J***K	\$ 152.88
T***Y, M***W	\$ 196.35
U***H, L***E	\$ 251.74
U***R, B***A	\$ 237.18
V***A, V***A	\$ 347.79
V***E, A***E	\$ 201.53
V***E, R***N	\$ 1,900.83
V***E, R***R	\$ 195.62
V***G, H***A	\$ 466.09
V***K, C***N	\$ 374.49
V***N, C***A	\$ 411.22
V***O, D***Y	\$ 679.35
V***P, B***N	\$ 396.25
V***R, B***N	\$ 176.85
V***S, J***T	\$ 77.76
V***S, R***D	\$ 187.69
V***U, H***I	\$ 162.18
V***Z, M***N	\$ 170.33
W***A, A***S	\$ 304.84
W***A, J***N	\$ 193.63
W***D, A***N	\$ 834.82
W***D, J***E	\$ 458.06
W***D, K***N	\$ 73.44
W***D, M***	\$ 97.09
W***E, A***A	\$ 135.80
W***E, G***N	\$ 230.08
W***E, M***W	\$ 389.93
W***E, M***Y	\$ 119.54
W***E, S***A	\$ 1,945.88
W***F, K***Y	\$ 1,275.76
W***G, F***A	\$ 322.76
W***G, F***N	\$ 4,138.06
W***G, M***I	\$ 617.96
W***H, M***N	\$ 84.59
W***K, A***W	\$ 161.32
W***K, C***G	\$ 194.22
W***K, K***H	\$ 197.29
W***L, R***H	\$ 222.94
W***N, D***L	\$ 315.04
W***N, E***A	\$ 319.40
W***N, K***	\$ 557.11
W***N, S***I	\$ 248.80
W***N, T***S	\$ 1,332.29
W***N, T***Y	\$ 1,098.66
W***R, A***N	\$ 1,353.73

Attachment B

Customer	Restitution Amount (before interest)
K***F, D***E	\$ 936.86
K***F, R***T	\$ 83.35
K***H, A***	\$ 141.34
K***H, R***D	\$ 108.64
K***I, E***M	\$ 1,805.30
K***I, J***S	\$ 125.45
K***I, S***N	\$ 84.18
K***I, T***Y	\$ 363.88
K***K, A***N	\$ 213.19
K***K, J***S	\$ 797.04
K***K, K***H	\$ 122.45
K***N, E***D	\$ 107.34
K***N, J***H	\$ 311.18
K***N, K***H	\$ 94.46
K***N, M***N	\$ 664.87
K***P, G***Y	\$ 430.27
K***R, D***H	\$ 84.70
K***R, J***N	\$ 175.27
K***R, K***I	\$ 335.39
K***R, L***E	\$ 110.58
K***R, R***H	\$ 2,273.83
K***R, T***D	\$ 159.26
K***R, T***M	\$ 94.65
K***S, N***S	\$ 810.33
K***S, S***N	\$ 945.97
K***T, P***I	\$ 228.15
K***T, R***L	\$ 106.00
K***Y, J***Y	\$ 945.98
K***Y, M***E	\$ 588.60
K***Y, R***Y	\$ 391.47
K***Y, S***E	\$ 213.11
K***Y, S***T	\$ 180.90

Customer	Restitution Amount (before interest)
W***R, B***N	\$ 194.48
W***R, D***E	\$ 148.00
W***R, D***H	\$ 123.23
W***R, J***S	\$ 139.45
W***R, T***D	\$ 73.75
W***S, A***R	\$ 536.81
W***S, B***E	\$ 216.50
W***S, J***S	\$ 279.81
W***S, N***E	\$ 176.21
W***S, P***A	\$ 141.33
W***S, S***N	\$ 77.12
W***S, V***A	\$ 120.48
W***T, B***N	\$ 87.29
W***T, T***D	\$ 272.74
W***T, T***E	\$ 587.21
W***T, T***Y	\$ 79.23
W***Y, A***E	\$ 1,606.56
W***Y, P***A	\$ 100.68
W***Y, S***N	\$ 177.90
Y***A, M***E	\$ 163.91
Y***G, D***	\$ 407.63
Y***G, L***N	\$ 589.13
Y***G, T***Y	\$ 355.07
Y***H, M***D	\$ 686.91
Y***N, J***A	\$ 124.99
Y***U, S***N	\$ 103.50
Y***W, E***E	\$ 96.37
Y***Y, S***N	\$ 159.63
Z***G, X***G	\$ 260.66
Z***N, B***D	\$ 114.51
Z***N, T***F	\$ 323.53

TOTAL RESTITUTION AMOUNT	\$ 321,166.59
---------------------------------	----------------------