

Attachment D-1: Number of Firms Meeting the Preliminary Criteria for Identification*

Identification Year	Number of FINRA Registered Member Firms	Firms Meeting the Preliminary Criteria for Identification	
		Number of Firms	Percentage of FINRA Registered Member Firms
2013	4,140	89	2.1%
2014	4,068	98	2.4%
2015	3,941	86	2.2%
2016	3,835	67	1.7%
2017	3,721	60	1.6%
2018	3,582	61	1.7%

* The statistics correspond to the number of firms that would have met the Preliminary Criteria for Identification as of year-end (December 31st) of the identification year.

Attachment D-2: Distribution of Firms Meeting the Preliminary Criteria for Identification by Firm Size*

Identification Year	Number of FINRA Registered Member Firms	Firms Meeting the Preliminary Criteria for Identification						
		Small	Mid-Size	Large	Total	Small	Mid-Size	Large
		Number of Firms				Percent of Total		
2013	4,140	84	4	1	89	94%	4%	1%
2014	4,068	92	4	2	98	94%	4%	2%
2015	3,941	79	5	2	86	92%	6%	2%
2016	3,835	61	5	1	67	91%	7%	1%
2017	3,721	54	6	0	60	90%	10%	0%
2018	3,582	55	6	0	61	90%	10%	0%

* Firm sizes are computed using the number of registered persons at the end of each identification year, e.g. December 31st. FINRA defines a small firm as a member with at least one and no more than 150 registered persons, a mid-size firm as a member with at least 151 and no more than 499 registered persons, and a large firm as a member with 500 or more registered persons. *See* FINRA By-Laws, Article I.

Attachment D-3: New Events (after identification) Associated with Firms Meeting the Preliminary Criteria for Identification

Identification Year	Number of Firms Meeting the Preliminary Criteria for Identification	Post-Identification Period	Number of "New" Registered Person and Member Firm Events in the Post-Identification Period
2013	89	2014-2018	1,859 (6.3x)**
2014	98	2015-2018	1,671 (7.5x)**
2015	86	2016-2018	1,287 (8.2x)**
2016	67	2017-2018	636 (9.2x)**
2013-2016	183***	2014-2018	2,793

* "New" events correspond to Registered Person and Member Firm Events that were identified or occurred after the firm's identification, and do not include events that were pending at the time of identification and subsequently resolved.

** The factors reported in parentheses represent a multiple for the average number of new events (on a per registered person basis) for firms that would have met the Preliminary Criteria for Identification relative to other firms. For example, the factor of 6.3x for 2013 shows that firms that met the Preliminary Criteria for Identification in 2013 had 6.3 times more new disclosure events (per registered person) in the years after identification (2014-2018) than other firms registered in 2013.

*** These 183 firms correspond to the unique number of firms that meet the Preliminary Criteria for Identification in one or more years during this period. Some of these firms meet the criteria in multiple years during the 2013-2016 period.