

CONSUMER PROTECTION

1. Is the financial institution currently in compliance with all applicable consumer financial protection laws?

Yes ___ No ___

If no, please briefly explain: _____

2. Does the financial institution have policies to prevent the use of illegal predatory consumer adverse sales goals as the bases for evaluation, promotion, discipline or compensation of employees?

Yes ___ No ___

If no, please briefly explain: _____

3. Does the financial institution encourage and maintain whistleblower protection policies for its employees and/or customers to report suspected illegal practices, including predatory sales goals?

Yes ___ No ___

If no, please briefly explain: _____

4. In the last five years, has the financial institution been subject to any disciplinary actions such as fines, suspensions, or settlements, undertaken by the Securities and Exchange Commission, the Consumer Financial Protection Bureau, the Municipal Securities Regulation Board, the Financial Industry Regulatory Agency and/or any State regulatory agency?

Yes ___ No ___

5. If the answer to question no. 4 is yes, please provide in separate attachment labeled Exhibit 3, what the violation(s) are, the reason for the enforcement action, what government agencies are involved, the date of the enforcement action, what is the current status, and how were or will the issues be resolved?

Exhibit 3

On October 12, 2017 (related to activity in 2013), without admitting or denying the findings, the firm consented to sanctions and to the entry of findings by FINRA related to the maintenance of due diligence files, internal procedures for underwriting when not acting as a lead underwriter, and regulatory registrations. With respect to these items, FINRA did not note any negative impact to any client or to the public. In addition, the firm has revised its internal procedures to address each of the concerns raised by FINRA's findings. The full text of the findings with respect to disciplinary action can be found at the following link <https://brokercheck.finra.org/> by entering Cabrera's CRD# 10081.