

THE FINANCIAL SERVICES INSURANCE PROGRAM

DISCRETIONARY MONEY MANAGEMENT SUPPLEMENTAL APPLICATION

INSTRUCTIONS: Complete this Supplement **only** if applying for coverage for discretionary investment management (other than discretion allowed under the terms of a Limited Mutual Fund Market Timing/Asset Allocation Agreement which is covered by the main *Application*).

1. BUSINESSES				
List below all business organizations affiliated with Applicant, including Applicant, for which discretionary investment management coverage is requested,				
indicating the relationship to Applicant. Use the S.I.F. if more space is needed.				
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II. CLIENTS AND MARKETING				
2a. List Applicant's total number of clients for the past three years and the current year:				
Prior Year (20): Prior Year (20): Prior Year (20): This Year (20)):			
2b. Split Applicant's clients into the following categories:				
Investment Companies:%	%			
Corporations Or Other (Describe):	%			
Business Entities:%				
Pension, Profit Sharing				
Or Similar Plans:% TOTAL:	100%			
2c. Does Applicant manage any investment companies?	🗆 Yes 🗖 No			
If "yes", list them below, and include their prospectuses, if registered, or partnership agreements or other documents, if a pr	rivate investment company with the			
Application. Include any limited partnerships or other organizations that could be viewed as investment companies except				
Company Act of 1940, as amended.				
2d. Do prospective clients have to meet certain qualifications to be accepted? If "yes", describe on the S.I.F.	🗆 Yes 🗆 No			
22. Bo propositive endition have to most contain qualimetation to be decepted? In yes, decense on the chine is a set of a root a				
How long does the typical client remain a client of Applicant ? years.				
2f. As an approved investment manager, is Applicant a fiduciary under ERISA for any managed portfolio?	🗆 Yes 🗆 No			
2g. Does Applicant function as a trustee, plan administrator, named fiduciary or in any other fiduciary capacity under ERISA of	ther than as an			
appointed investment manager? If "yes", explain on the S.I.F.				
appointed investment manager? If yes, explain on the S.t.				
2h. Does Applicant adhere to the Guidelines of the Association For Investment Management And Research (formerly the Fina	ncial			
Analysts Federation) and other relevant rules and regulations in presenting its investment management results?	🗆 Yes 🗆 No			
2. Deep Annline of present its best warst and mean partialis results to prespective alignts?				
2i. Does <i>Applicant</i> present its best, worst and mean portfolio results to prospective clients?	🗆 Yes 🗆 No			
2j. Does Applicant present model portfolio results to prospective clients?	🗆 Yes 🗆 No			

III. INVESTMENT PORTFOLIOS						
3a. List Applicant's assets under management for the past three years and the current year:						
Prior Year (20): \$ Prior Ye	ear (20): \$	Prior Year (20): \$ _	This Year (20): \$			
3b. Estimate the percentage of client assets investe	d in the securities listed below	:				
Cash and Cash Equivalents (liquid						
investments of 1 year or less maturity):	Total Equity Investm		Total Other Investments:	%		
Medium and Long Term Fixed	% Common Stock:	%	Option Contracts:	%		
Income Investments:	Preferred Stock	%	Hedge Funds:	_%		
U.S. Gov't./Agency Bonds:%	% Foreign Stock:	%	Future Contracts:	%		
Municipal Bonds:%	Mutual Funds:	%	Real Estate Ltd. Partnerships:	%		
Corporate Bonds:%	Other (Describe):%	Other Ltd. Partnerships:	%		
Mortgages:%	· · · · · · · · · · · · · · · · · · ·	, 	(e.g. Oil, Gas, Cable TV.)			
Derivatives:%			Precious Metals:	%		
Mutual Funds:%			Rare Gems and Coins:	%		
Foreign Bonds:%			Collectibles:	_%		
Guarant'd Invest. Contracts:%			(e.g., art, ceramics)			
Other (Describe):%			Other (Describe):	%		
			Total	100%		

3c. If Applicant's client portfolios include foreign securities, please list the countries invested in or mutual funds used and how currency exposure is hedged: ______

3d. If <i>Applicant's</i> client portfolios include options or futures contacts, describe the rol	e these securities play in the portfolios:	
3e. What percentage of Applicant's client portfolios could be described as illiquid? _	%	
3f. What percentage of <i>Applicant's</i> client portfolios could be described as iniquid r		
3g. Estimate the average, minimum and maximum turnover of <i>Applicant's</i> client port Average Portfolio: Turnover:%. Minimum Portfolio Turnove	r:%. Maximum Portfolio Turnover:%.	
3h. Estimate the average, minimum and maximum size and number of securities in A Invested Number of Assets (\$) Securities Average Portfolio:	oplicant's client portfolios:	
3i. Estimate the mean return on client portfolios vs. Appropriate comparative index for		
Equity Portfolios	Fixed Income Portfolios	
Client Portfolios Index (Specify) Prior Year (20):%%	Client Portfolios Index (S Prior Year (20):%	Specify) %
Prior Year (20):%%	Prior Year (20):%%	%
Prior Year (20):%%	Prior Year (20):%%	%
Prior Year (20):%%	Prior Year (20):%	%
This Year (20):%%	%%	%
IV. INVESTMENT PHILOSOPHY		
 4a. Describe <i>Applicant's</i> investment philosophy and strategies utilized (e.g., capital p stocks; aggressive growth through growth small stocks and leverage; etc.): 	reservation and income utilizing government bonds; capital gains thr	rough growth
4b. Indicate any particular type of asset management in which <i>Applicant</i> specializes	(e.g., asset allocation using mutual funds, commodities, etc.):	
	detail on the S.I.F. Yes □ No Arbitrage: □ Yes □ No Yes □ No)
 4d. Check which one of the following characterizes the authority <i>Applicant</i> exercises Full discretionary authority for all trades; client receives periodic notification of Full discretionary authority for all trades; client notified of each trade. Partial discretionary authority over trading (e.g., asset allocation among mutu No discretionary authority over trades; recommend trades but client makes the Other. Describe on the S.I.F. 	of portfolio composition and net asset value. Ial funds). Describe on S.I.F. ne decision.	
4e. Are any client funds pooled with other client funds for investment management? Are any of Applicant's own funds invested in these pools?]Yes □ No]Yes □ No
4f. Describe the procedures used in selecting securities for client portfolios (e.g., investmentagers can choose; all companies are visited; rely on brokers' research departmentagers.		rtfolio
V. BUSINESS AND ADMINISTRATIVE PRACTICES		
5a. 1. How are client goals and strategies and their appropriateness determined?		
2. Are client investment goals and strategies stated in detail in their investment of	 ontracts? E]Yes □ No
3. How frequently are client goals and strategies reviewed and updated?		
4. How often does <i>Applicant</i> meet with clients?		
 5. Are trades discussed with clients prior to execution? 6. Are clients notified of all trades?] Yes □ No] Yes □ No
If "yes", when?	L	
7. Does Applicant's client contract have an arbitration clause?	C]Yes □ No

7. Does Applicant's client contract have an arbitration clause?

5b. 1. Does Applicant have written risk management guidelines?	□ Yes □ No
2. Does Applicant have an internal control/audit system to insure that client investment goals and strategies are being adhered to and portfolio	
managers are not exceeding their authority?	🗆 Yes 🗖 No
3. Does Applicant have a system to verify the accuracy and timeliness of purchases/sales orders and confirmations?	🗆 Yes 🗖 No
4. Does Applicant have written guidelines for personal investments/trades by Applicant's officers, directors, partners and employees?	🗆 Yes 🗖 No
5. Does Applicant have written guidelines regarding conflicts of interest?	🗆 Yes 🗆 No
6. Does Applicant have written guidelines regarding the use of non-public information?	🗆 Yes 🗆 No
7. Does Applicant receive or pay referral fees?	□ Yes □ No
If "yes", are these disclosed to Applicant's clients?	🗆 Yes 🗆 No
5c. 1. Describe the criteria used to choose the custodian for client assets under management:	
2. Deep Ann figure function on the supportion for all and another under management 2. If "use" symbols on the CLE	
 Does <i>Applicant</i> ever function as the custodian for client assets under management? If "yes", explain on the S.I.F. What organizations are custodians for client assets under management?	🗆 Yes 🗆 No
4. Does Applicant have control of any client assets in any capacity other than as the client's investment manager (e.g., trustee)?	□ Yes □ No
If "yes", explain on the S.I.F.	
5. Does Applicant have authority to remove funds from client accounts for any reason other than payment of investment management fees?	🗆 Yes 🗆 No
If "yes", explain on the S.I.F.	
5d. 1. What criteria are used to choose the broker-dealer to execute client trades?	
2. Does Applicant have any "soft dollar" arrangement with broker-dealers? If "yes", explain on S.I.F.	🗆 Yes 🗆 No
3. Is Applicant associated through ownership, contract, etc. with any broker-dealer?	🗆 Yes 🗆 No
If "yes", explain the relationship on the S.I.F. and the percentage of client trades executed by this broker-dealer.	
5e. Does Applicant manage wrap accounts?	□ Yes □ No
If "yes", what percentage of Applicant's accounts are wrap accounts?%	
5f. List the name and address of Applicant's law firm:	
5g. 1. List the name and address of <i>Applicant's</i> accounting firm:	
2. Is Applicant audited annually?	□ Yes □ No
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VI. ADDITIONAL INFORMATION. Attach a copy of the following documents.	
6a. Prospectus, or equivalent document if unregistered, of any investment company managed by <i>Applicant</i> .	
6b. Written risk management guidelines.	
6c. Written guidelines for personal trades, conflicts of interest, use of non-public information, etc.	
APPLICANT:Date:	
BY: PRINT NAME AND TITLE:	