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Individual Needs Analysis 2011 Firm Wide CE Survey

Under FNRA Rule 1120, our Firm is required to conduct a continuing education program for its registered personnel covered by the rule. In order to prepare a plan and be in compliance with the rule, please provide the information requested in this Individual Needs Analysis.

Any information furnished on this Needs Analysis will remain confidential and will not be used for any other purpose by RegEd.

Firm Element Continuing Education Program

Name

SSN

Firm

Reviewed by

Title

Tell Us About You and Your Business

1. Are you licensed to sell variable insurance products?

- Yes
 No

2. How would you describe yourself? Please select one of the following:

| | |
|--|--|
| Sales Assistant | Your main business is supporting the sales efforts of another producer. You interact with clients. |
| Financial Consultant | Your main business is the retail sale of financial products with some planning services. |
| Insurance Agent | Your main business is the retail sale of insurance-based products including variable annuities and/or life insurance. |
| Financial Planner | Your main business is providing of financial planning services and the associated sale of products to fund plans. |
| Investment Advisor | You operate a Registered Investment Advisor firm and limit your practice to fee-based business only. |
| Money Manager | You manage accounts for other producers and have no personal retail business. |
| Equity Trader | You are employed as an Equity Trader with no or few retail accounts. |
| Bond Trader | You are employed as a Bond Trader with no or few retail accounts. |
| Investment Banker | You are employed as an investment banker with few or no retail accounts. |
| Financial Principal | You are employed as a FINOP with no or few retail accounts. |
| Compliance Principal | You are employed as a Compliance Officer with no or few retail accounts. |
| Marketing Principal | You are employed as a Marketing Principal with no or few retail accounts. |
| Supervising Principal | You are not associated with an OSJ but have supervisory responsibilities with respect to registered representatives. |
| Branch (or OSJ) Manager (Non-Producer) | You are employed as a Branch (or OSJ) Manager with no or few retail accounts. Your primary job is supervision. |
| Branch (or OSJ) Manager (Producer) | You are employed as a Branch (or OSJ) Manager and run your own book of business as well. |
| Institutional Supervisor | You are responsible for supervising the activities of institutional sales, institutional trading, syndication or investment banking. |
| Wholesaler | You are employed as a registered product wholesaler with no or few retail accounts. Your primary job is representing the issuer. |
| Home Office/Administrative Staff | You are employed in the home office or in a branch office in an administrative capacity but have few or no clients. You interact with the Firm's clients and representatives. |
| Research Analyst and/or Research Assistant | You prepare or assist in the preparation and delivery of reports on market segments, competitors or investment opportunities to upper management for a financial services company. |

3. In the most recent 24 months, have you been the subject of any disciplinary proceedings by the SEC, any SRO, or any state regulatory body?

- Yes
- No

3.1. If yes, what was the allegation?

4. In the most recent 24 months, have you been involved in any type of consumer-initiated arbitration action?

- Yes
- No

4.1. If yes, what was the allegation?

5. In the most recent 24 months, have you been the subject of any consumer-initiated oral or written complaint?

- Yes
- No

5.1. If yes, what was the allegation?

6. Are you subject to heightened supervision?

- Yes
- No

6.1. If yes, what is the reason?

Registration/Professional Designation Information

1. Indicate whether you hold the following registrations:

| | Yes | No | | Yes | No | | Yes | No | | Yes | No |
|------|-----|----|------|-----|----|------|-----|----|------|-----|----|
| S-3 | | | S-16 | | | S-37 | | | S-71 | | |
| S-4 | | | S-17 | | | S-38 | | | S-72 | | |
| S-5 | | | S-22 | | | S-39 | | | S-79 | | |
| S-6 | | | S-23 | | | S-42 | | | S-82 | | |
| S-7 | | | S-24 | | | S-51 | | | S-86 | | |
| S-8 | | | S-26 | | | S-52 | | | S-87 | | |
| S-9 | | | S-27 | | | S-53 | | | | | |
| S-10 | | | S-28 | | | S-55 | | | | | |
| S-11 | | | S-30 | | | S-62 | | | | | |
| S-12 | | | S-31 | | | S-63 | | | | | |
| S-14 | | | S-32 | | | S-65 | | | | | |
| S-15 | | | S-33 | | | S-66 | | | | | |

2. Indicate whether you hold the following professional designations:

| | Yes | No | | Yes | No | | Yes | No | | Yes | No |
|-----|-----|----|------|-----|----|-----|-----|----|-------|-----|----|
| CFP | | | ChFC | | | CLU | | | LUTCF | | |
| CPA | | | CFA | | | CEP | | | CFS | | |

3. Do you intend to take any continuing education courses required by your professional designation board this coming year?

- Yes
- No

3.1. If yes, please identify all courses.

Product Information

1. Indicate the percentage of your compensation earned as a result of each of the following products (you must select one in each category):

| | None | 1-25% | 26-50% | 51-75% | 76-100% |
|--------------------------------------|------|-------|--------|--------|---------|
| Individual Equities | | | | | |
| Options (Index/Equity/OTC) | | | | | |
| Commodities | | | | | |
| Futures | | | | | |
| Corporate Bonds | | | | | |
| Government Bonds | | | | | |
| Government Agency Bonds | | | | | |
| Short-term Instruments/Money Markets | | | | | |
| Asset-Backed Securities | | | | | |
| Municipal Bonds | | | | | |
| Limited Partnerships | | | | | |
| Private Placements | | | | | |
| Structured Products/Structured Notes | | | | | |
| Hedge Funds (all types) | | | | | |
| Wrap Accounts | | | | | |
| REITS | | | | | |
| Unit Investment Trusts | | | | | |
| Variable Annuities | | | | | |
| Variable Life Insurance | | | | | |
| Fixed Insurance | | | | | |
| Security Futures | | | | | |
| 529 Plans | | | | | |
| Asset-Backed Bonds | | | | | |
| CMOs | | | | | |
| Penny Stocks | | | | | |
| Equity Indexed Annuities | | | | | |
| Brokered CDs | | | | | |
| Mutual Funds (A Shares) | | | | | |
| Mutual Funds (B Shares) | | | | | |
| Mutual Funds (C Shares) | | | | | |
| Other: | | | | | |
| Other: | | | | | |
| Other: | | | | | |
| Other: | | | | | |
| Other: | | | | | |
| Other: | | | | | |
| Other: | | | | | |
| Other: | | | | | |

Course Topics

1. Indicate whether you would like to fulfill your 20 Firm Element CE requirements by taking courses in any of the following areas:

| | Yes | No |
|---|-----|----|
| 1031 Non Taxable Exchanges | | |
| Account Documentation | | |
| Advertising and Sales Literature | | |
| AML Considerations for Correspondent Accounts | | |
| AML Considerations for Foreign Banks | | |
| AML Considerations for Private Banking Accounts | | |
| Asset Allocation | | |
| Asset Backed Securities | | |
| Brokered CDs | | |
| Case Studies in Ethics for Retail Sales | | |
| Chinese Walls | | |
| CMOs | | |
| College Savings | | |
| Consolidated Account Reports | | |
| Corporate Bonds | | |
| Correspondence | | |
| Currency Transaction Reporting | | |
| Customer Communications | | |
| Customer Complaints | | |
| Customer Identification Procedures | | |
| Defined Contribution Plans | | |
| Do Not Call Registry | | |
| Electronic Communications | | |
| Equities | | |
| Equity Indexed Annuities | | |
| Equity Options | | |
| Estate Planning | | |
| Ethics | | |
| Ethics (general) | | |
| Ethics for Institutional Sales (Case Studies) | | |
| Excessive Trading | | |
| ETFs | | |
| ETNs | | |
| Fee Based Accounts | | |
| Fixed Insurance | | |
| Gifts and Gratuities | | |
| Government Bonds | | |
| Guiding Clients Through Difficult Markets | | |
| Hedge Funds | | |
| High Yield Investments | | |
| Impact of the Gramm-Leach-Bliley Act | | |
| Income Taxation of Life Insurance | | |
| Index Options | | |
| Information Security Awareness | | |
| Insider Trading | | |
| Institutional/Proprietary Trading | | |

| | Yes | No |
|---|-----|----|
| Investment Advisers Regulation | | |
| IPO Allocations | | |
| IRA Distribution Planning | | |
| IRAs | | |
| Know Your Customer | | |
| Limited Partnerships | | |
| Margin/Credit | | |
| Medicare D | | |
| Municipal Bonds | | |
| Municipal Securities | | |
| Mutual Fund Sales Practices | | |
| Mutual Funds (all types) | | |
| OFAC | | |
| Outside Activities | | |
| Pension Planning | | |
| Prevention and Detection of Money Laundering | | |
| Privacy | | |
| Private Placements | | |
| Product Suitability Issues | | |
| Regulation B | | |
| Replacements, Exchanges and Mutual Fund Switches | | |
| Research Analysts Conflicts of Interest | | |
| Retirement Planning for Seniors | | |
| Retirement Plans | | |
| Sales of Variable Annuities in Tax Advantaged Accounts | | |
| Sales of Variable Annuities to Seniors | | |
| Sales Practices for Sales of Bonds and Bond Funds | | |
| Sarbanes Oxley Act | | |
| Securities Fundamentals for Sales Assistants | | |
| Selling Away | | |
| Small Business Retirement Plans | | |
| Social Media | | |
| Soft Dollars | | |
| Structured Products | | |
| Suitability Issues for Fixed Income Products | | |
| Supervision (general) | | |
| Supervision of Equity Indexed Annuities | | |
| Supervision of Institutional Accounts | | |
| Supervision of Retail Accounts | | |
| Supervision Updates | | |
| Suspicious Activity Reporting | | |
| U-4 Updates | | |
| Underwriting/Syndicate Participation | | |
| Variable Annuities, Exchanging and Selling | | |
| Variable Annuities, Functions, Benefits and Limitations | | |
| Variable Annuities, Income Taxation | | |
| Variable Annuities, Living Benefit Riders | | |
| Variable Life Insurance | | |

Ethics

The Securities Industry/Regulatory Council on Continuing Education has advised that ethical issues should be addressed in Firm Element Training programs. A firm’s annual needs assessment should try to identify ethical dilemmas that employees face (or see their colleagues facing), as well as pressures that may keep employees from acting properly or reporting their ethical concerns. Examples may include: (a) conflicts of interest, (b) relationships with other employees, (c) relationships with customers, and (d) representing the firm’s interests.

Please identify any ethical issues that you think should be addressed in your training:

| Conflicts of Interest | Yes | No |
|--------------------------------------|------------|-----------|
| Personal Trading | | |
| Outside Business Activities | | |
| Gifts/Gratuities/Entertainment | | |
| Political Contributions | | |
| | | |
| Relationships with Co-Workers | Yes | No |
| Harassment | | |
| Discrimination | | |
| | | |
| Relationships with Customers | Yes | No |
| Customer Needs First | | |
| Improper Customer Requests | | |
| Loans to/from Customers | | |
| | | |
| Relationships with Firm | Yes | No |
| Use of Firm Property | | |
| Maintaining Accurate Records | | |
| Responding to Regulators | | |
| | | |
| Other: | | |
| Please identify: | | |
| | | |