

# *Feltl and Company*

SECURITIES BROKERAGE AND INVESTMENT BANKING

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## **COMPLIANCE ALERT**

**2014-01**

**To:** All Brokers

**From:** Matthew Oholendt, CCO

**RE:** Trade Cancel/Rebills

**Date:** 1/09/2014

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Effective immediately, all cancels/rebills on any trade must be submitted to trading in written form, and signed off by a Branch Manager or Executive of Feltl and Company. All verbal requests (in person or over the phone) will no longer be processed by the trading desk.

It is the firm's hope that standardizing trade corrections will cut down on miscommunications. In order to streamline this process, the firm has updated the Cancel/Rebill Form to better serve your needs. The form is now electronically fillable, and we've tried to eliminate all unnecessary information.

Included with this Compliance Alert is a copy of the Cancel/Rebill form, which is also available on the Feltl website under the forms section. Thank you for your continued cooperation.

PS – On another note, the firm would like to remind all brokers that it is only accepting unsolicited orders on Penny Stock transactions. Please see the attached Compliance Alert from 2012.

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## CANCEL / REBILL REQUEST

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ACCOUNT NAME: \_\_\_\_\_

IE NAME: \_\_\_\_\_

ACCOUNT NUMBER: \_\_\_\_\_

REP. NUMBER: \_\_\_\_\_

Please Enter Trade Information From the Trade Confirm Below:

Symbol/Cusip: \_\_\_\_\_

Quantity: \_\_\_\_\_

Price: \_\_\_\_\_

Trade Date: \_\_\_\_\_

Settlement Date: \_\_\_\_\_

Principle Amount: \_\_\_\_\_

Commission: \_\_\_\_\_

**I am requesting a cancel/re-bill for the above-referenced customer account for the following reason:**

- Data Entry Error. Do Not Bill
- Incorrect account number. Correct name: \_\_\_\_\_ & Correct account number: \_\_\_\_\_
- Commission is incorrect. Correct commission should be \_\_\_\_\_
- Incorrect Price. Price should be \_\_\_\_\_
- Other. Please explain \_\_\_\_\_
- Do not charge CXL/COR fees. Explain. \_\_\_\_\_

**(NOT TO BE USED FOR DATA ENTRY ERRORS)**

Date: \_\_\_\_\_

Investment Executive

Date: \_\_\_\_\_

Branch Manager

*Feltl and Company*  
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**COMPLIANCE ALERT**

**2012-05**

**To:** All Securities Licensed Personnel  
**From:** Mitchell Edwards, CCO  
**RE:** Penny Stock Procedures  
**Date:** **October 10, 2012**

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**REMEMBER – YOU MAY NOT SOLICIT THE PURCHASE OF “PENNY STOCKS”** (i.e., Bulletin Board or Pink Sheets), unless Compliance has approved a specific exception for that stock. Typically, Compliance will only approve exceptions if there is Corporate Finance relationship with the company that allows us to satisfy our due diligence obligations AND/OR the security qualifies for an exemption from the Penny Stock rules due to Revenue or Assets. Attached is a form to request such an exception.

Compliance approval in no way limits the Registered Representative’s responsibility to maintain the proper due diligence file as required by Rule 2111 for all solicited investments.

If you have a customer who desires to make an Unsolicited Purchase of a Penny Stock, he/she may only do so by filling out and signing a copy of our “Unsolicited Letter” in advance of the trade. A copy of the Unsolicited Letter is attached and also can be found on F&C’s website.

The Unsolicited Letter must be received by Compliance prior to purchase. Do NOT ask if you can have a few days to obtain the letter after the trade. Violations of this policy will result in immediate cancellation of the trade. **There are NO exceptions.**

Thanks for your attention and anticipated cooperation.



Mitchell Edwards