

**FINANCIAL INDUSTRY REGULATORY AUTHORITY  
OFFICE OF HEARING OFFICERS**

Department of Enforcement,

Complainant,

v.

D. Allen Blankenship,  
CRD No.2842335,

Respondent.

Disciplinary Proceeding  
No. 2019064333401

**COMPLAINT**

The Department of Enforcement alleges:

**SUMMARY**

1. During the period from August 2016 to September 2019 (the “Relevant Period”), while registered through the firm, Independent Financial Group, LLC (BD No. 7717) (IFG), respondent D. Allen Blankenship engaged in unsuitable mutual fund trading. Specifically, Blankenship, solely to earn commissions, recommended unsuitable short-term trading of Class A mutual funds that caused 11 customer accounts to pay \$21,158.45 in excessive sales charges. Blankenship also caused 37 customer accounts to miss \$21,873.91 in Class A mutual fund breakpoint discounts. He did so by dividing his customers’ purchases of the same mutual fund into multiple purchases of less than \$20,000 each, to evade detection and supervisory review by his firm, which unnecessary division resulted in the customers’ not receiving available breakpoint discounts. As a result, Blankenship violated FINRA Rules 2111 and 2010.

2. Blankenship's pattern of dividing customers' mutual fund investments into multiple purchases of less than \$20,000 circumvented written procedures and supervisory reviews of the firm that applied to transactions of \$20,000 or more. Blankenship further circumvented firm procedures and supervisory systems by failing to complete required forms concerning mutual fund transactions, failing to obtain the customers' signatures on the forms, and failing to submit the forms for supervisory approval. This conduct constitutes an independent violation of FINRA Rule 2010.

3. Finally, Blankenship mismarked 250 mutual fund transactions as unsolicited, causing IFG's books and records to be inaccurate, thereby violating FINRA Rules 4511 and 2010.

#### **RESPONDENT AND JURISDICTION**

4. Blankenship first became registered with FINRA as an Investment Company and Variable Products Representative (IR) through an association with two former member firms in February 1997. During the period from February 1997 until July 2016, Blankenship was registered through several FINRA member firms as an IR, as a General Securities Representative (GSR) (beginning in February 1999), and as a General Securities Principal (beginning in April 2001).

5. During the period from July 2016 to October 2019, Blankenship was registered as an IR, GSR, and GP through IFG. According to the Uniform Termination Notice for Securities Industry Registration (Form U5) filed with respect to Blankenship, IFG discharged Blankenship on October 14, 2019, for the stated reason that he was "terminated for violation of firm's policy with regard to submission of required documents for certain mutual fund transactions and failure to ensure clients were receiving benefits of mutual fund breakpoints."

6. Since April 2020, Blankenship has been and continues to be registered as an IR, GSR and GP through different FINRA member firms.

## FACTS

### ***Blankenship repeatedly recommended to his customers unsuitable short-term trading of Class A mutual funds.***

7. Blankenship's primary business at IFG was the recommendation and sale of Class A mutual funds.

8. Class A mutual funds are long-term investments because they have upfront sales charges, which often exceed 5% of the total purchase price. These sales charges apply each time the customer purchases a new Class A fund.

9. Blankenship recommended that 9 IFG customers engage in 27 short-term trades of Class A mutual fund shares in 11 accounts. In these transactions, Blankenship recommended that his customers purchase Class A shares and then sell those shares after holding them for less than a year. The customers' average holding period for these funds was just 269 days. A chart identifying these customers, their transactions, and their mutual fund holding periods is attached hereto as *Exhibit A*.

10. Following 23 out of 27 purchases held for the short-term, Blankenship recommended that his customers purchase new Class A mutual funds in a different fund family, thereby incurring additional mutual fund sales charges.

11. Blankenship's recommendation of the 27 short-term trades lacked a reasonable basis. Blankenship effected these trades without having reasonable grounds for believing that the trades were suitable in light of the nature and frequency of the transactions. These short-term trades were inconsistent with the long-term nature of the Class A shares.

12. As a result of the short-term trades, the 11 customer accounts incurred \$21,158.45 in unnecessary upfront sales charges, with Blankenship obtaining \$16,014.16 of that amount in commissions.

***Blankenship purposefully evaded and circumvented IFG's supervisory procedures by failing to submit required forms for review for mutual fund transactions.***

13. IFG's written supervisory procedures (WSPs) in effect from prior to July 2016 until July 2019 (*i.e.*, during almost all of the Relevant Period) required that registered representatives complete a Mutual Fund/529 Plan Transaction Form (Mutual Fund Form) in the following three instances: (i) initial purchases of any mutual fund made by customers (with the exception of mutual fund exchanges within the same fund family); (ii) all subsequent purchases of a mutual fund in amounts greater than \$20,000 made after an initial purchase; and (iii) all mutual fund switch transactions where customers sold shares of one mutual fund and used the proceeds to purchase another mutual fund, Unit Investment Trust, variable annuity, or life insurance product. IFG required the Mutual Fund Form to be signed by the customer, the registered representative, and an IFG supervisory principal.

14. The Mutual Fund Form required registered representatives to provide:

- a. information about the funds being purchased, including whether the transaction was solicited or unsolicited, the name of the mutual fund, share class, and amount of the purchase;
- b. customer background information, including information about the source of funds for the purchase and the customer's investment experience, investment objectives, and risk tolerance;
- c. the amount of the sales charge, including the percentage sales charge and/or whether there was a contingent deferred sales charge;
- d. information relevant to switch transactions, such as information concerning the investments that were sold to fund the purchase transaction(s) and the reasons for the switch; and

e. information to ensure that the customer received any applicable breakpoints.

15. The WSPs provided that the Mutual Fund Form “serve[s] as an explanation of the investment, disclosure document and help[s] determine if the client received the appropriate sales charges.”

16. From at least July 2016 to July 2019, IFG’s system for supervising mutual fund transactions was designed to flag for review only mutual fund purchases of \$20,000 or more.

17. In July 2019, IFG implemented changes to its supervision of mutual fund transactions. The firm replaced the Mutual Fund Form with a different form known as the Mutual Fund Purchase Switch Acknowledgment Form (the “Switch Acknowledgment Form”). The Switch Acknowledgment Form was required to be used only for mutual fund switch transactions, regardless of the dollar amount of the transaction (and not for all initial mutual fund purchases or subsequent purchases in amounts greater than \$20,000 as was required with the Mutual Fund Form). The Switch Acknowledgment Form, like the Mutual Fund Form, was required to be signed by the client, registered representative, and IFG supervisory principal. The Switch Acknowledgment Form required disclosure of important facts concerning mutual fund switch transactions including disclosure as to the reasons for the switch and the costs associated with purchasing new mutual funds.

18. Blankenship did not complete and submit to IFG a Mutual Fund Form or Switch Acknowledgment Form for at least 429 transactions that required a form submission.

19. In addition, Blankenship recommended 351 mutual fund switch transactions where he effected sales of mutual fund shares and then purchased new fund shares in a different fund family for his customers within 90 days of the sale. In each of those instances, Blankenship

was required to complete either the Mutual Fund Form or the Switch Acknowledgement Form but failed to do so.

20. Blankenship purposefully circumvented IFG's procedures and prevented and evaded his firm's supervision of these mutual fund transactions in his customers' accounts.

***Blankenship disadvantaged customers and circumvented firm supervision by dividing mutual fund investments into multiple transactions.***

21. Class A mutual funds offer "breakpoint" discounts, entitling customers to reduced sales charges, when the customer's aggregate investments in a fund exceeds certain thresholds. For example, a mutual fund might charge a front-end sales charge, or load, of 5.75 percent for share purchases of less than \$50,000 but reduce the load to 4.50 percent for investments between \$50,000 and \$99,999, and further reduce or eliminate the load for larger investments.

22. Blankenship divided customers' mutual fund investments into multiple purchases of the same fund over several days, in amounts less than \$20,000, so that the purchases would escape supervisory review that would have revealed to the firm that he was dividing customers' investments for the purpose of obtaining additional commissions.

23. On 234 occasions, involving a total of 578 purchases in 59 customer accounts, Blankenship divided a customer's mutual fund investment into multiple purchases over the course of two to five business days, with each purchase in an amount less than \$20,000. A list identifying these customers and transactions is attached hereto as *Exhibit B*.

24. Blankenship effected 273 transactions in amounts from \$19,000 to \$19,975 (including 116 transactions in the amount of \$19,500 in 40 accounts), and another 220 transactions between \$17,000 and \$19,000.

25. Because Blankenship divided his customers' mutual fund investments in this manner, Blankenship caused 37 customer accounts in 143 purchases to incur a total of

\$21,873.91 in excess sales charges resulting from missed breakpoints they would have received if Blankenship had effected each purchase as a single transaction.<sup>1</sup> These customers missed the breakpoints because Blankenship split up their purchases into multiple transactions of less than \$20,000 each over several days. The impacted customers, transactions and missed breakpoints are identified on *Exhibit B*.

26. Additionally, Blankenship failed to obtain Letters of Intent from his customers that would have permitted them to obtain the breakpoints or discounts on the entire amounts of multiple mutual fund purchases made over time. In a Letter of Intent, investors express a commitment to buy a specified number of shares over a period of time, usually 13 months, which allows the investors to receive breakpoint discounts on all of their purchases, even those before reaching the “breakpoint” or threshold amount which otherwise would not have been eligible for any discount.

***Blankenship mismarked order tickets.***

27. Blankenship recorded the orders for his customers’ initial purchases of a mutual fund as “solicited.” However, Blankenship mismarked each of the subsequent purchases he effected over the course of several days, to complete the mutual fund investment he recommended to the customer, as “unsolicited” when the subsequent purchases were not, in fact, unsolicited but rather were part of the original solicited purchases. Blankenship mismarked these order tickets to conceal his scheme to evade supervisory review by his firm of these trades.

28. In 186 of the 234 occasions during the Relevant Period in which Blankenship improperly divided customers’ mutual fund investments, Blankenship marked the initial

---

<sup>1</sup> The \$21,873.91 in missed breakpoints discounts does not include \$1,455.60 from 8 transactions involving 4 accounts and 3 customers with missed breakpoints that are also included in the excessive sales charges.

purchase as “solicited” but marked at least one subsequent purchase of additional amounts of the same fund as “unsolicited.”

29. In total, Blankenship mismarked at least 250 mutual fund purchases as “unsolicited” that he should have marked as “solicited.”

***IFG discovers Blankenship’s misconduct and terminates him.***

30. After IFG modified its electronic system for reviewing mutual fund transactions in July 2019, including removing the \$20,000 threshold for flagging transactions for further review and implementing new parameters flagging transactions for possible mutual fund switching, the firm identified for review several Blankenship transactions. The firm then conducted a further review and identified, among other things, Blankenship’s failure to submit the Mutual Fund Forms and Switch Acknowledgment Forms and his practice of dividing mutual fund investments into amounts less than \$20,000 that resulted in his clients’ failure to obtain breakpoint discounts. After investigating, IFG discharged Blankenship.

**FIRST CAUSE OF ACTION  
Unsuitable Mutual Fund Transactions (Violation of FINRA Rules 2111 and 2010)**

31. The Department of Enforcement realleges and incorporates by reference all preceding paragraphs.

32. FINRA Rule 2111 requires, in part, that:

A member or an associated person must have a reasonable basis to believe that a recommended transaction or investment strategy involving a security or securities is suitable for the customer, based on the information obtained through the reasonable diligence of the member or associated person to ascertain the customer’s investment profile.

33. Rule 2111.05(a) states that the reasonable-basis obligation requires “a member or associated person to have a reasonable basis to believe, based on reasonable diligence, that the recommendation is suitable for at least some investors.”



34. A registered representative may violate his or her reasonable-basis suitability obligation when recommending a pattern of short-term trading in mutual funds, where there is no indication of a change in the investment objectives of the customers and where new sales loads are incurred.

35. In addition, recommending investments without considering potential cost-savings for the customer, such as those from mutual fund breakpoint discounts, violates a registered representatives' reasonable basis suitability obligation.

36. FINRA Rule 2010 provides that “[a] member, in the conduct of its business, shall observe high standards of commercial honor and just and equitable principles of trade.”

37. A violation of FINRA Rule 2111 is also a violation of FINRA Rule 2010.

38. Blankenship engaged in unsuitable short-term trading of mutual funds by effecting 27 short-term trades in 11 customer accounts that lacked a reasonable basis. The holding periods for these trades ranged from 119 to 364 days. Those transactions resulted in sales charges of \$21,158.45 paid by the customers and generated commissions of \$16,014.16 for Blankenship.

39. Additionally, Blankenship recommended 143 mutual fund purchases where he failed to ensure that 37 accounts for 30 customers received \$21,873.91 in available mutual fund breakpoints.

40. By reason of the foregoing, Blankenship violated FINRA Rules 2111 and 2010.

**SECOND CAUSE OF ACTION  
Circumventing Firm Procedures (Violation of FINRA Rule 2010)**

41. The Department of Enforcement realleges and incorporates by reference all preceding paragraphs.

42. Circumventing firm procedures, particularly those designed to protect customers, is conduct inconsistent with high standards of commercial honor and just and equitable principles of trade and a violation of FINRA Rule 2010.

43. Blankenship circumvented IFG's procedures for supervising mutual fund transactions when he intentionally divided his customers' mutual fund investments into multiple purchases of amounts less than \$20,000 to avoid completing and submitting Mutual Fund Forms and Switch Transaction Forms as required by IFG's written procedures and to evade the firm's supervisory requirements, and circumvent the firm's system, including its electronic system, for reviewing mutual fund transactions for suitability.

44. Blankenship's circumvention of firm procedures deprived his customers of important information concerning their mutual fund transactions and impeded IFG from supervising mutual fund transactions.

45. By reason of the foregoing, Blankenship violated FINRA Rule 2010.

**THIRD CAUSE OF ACTION**  
**Mismarking Orders**  
**(Violation of FINRA Rules 4511 and 2010)**

46. The Department of Enforcement realleges and incorporates by reference all preceding paragraphs.

47. FINRA Rule 4511 provides that "[m]embers shall make and preserve books and records as required under FINRA Rules, the Exchange Act, and the applicable Exchange Act Rules." This rule applies to both members and associated persons.

48. Securities Exchange Act Rule 17a-3(a)(6)(i) requires broker-dealers to make and keep current "[a] memorandum of each brokerage order, and of any other instruction, given or

received for the purchase or sale of securities, whether executed or unexecuted,” which shall include “the terms and conditions of the order or instructions.”

49. FINRA members, and their associated persons, have an obligation to ensure that the books and records made and preserved under FINRA Rule 4511 are accurate.

50. A violation of FINRA Rule 4511 is also a violation of FINRA Rule 2010.

51. Blankenship mismarked 250 of the above-described purchases of mutual funds as unsolicited, even though he solicited these investments.

52. By reason of the foregoing, Blankenship violated FINRA Rules 4511 and 2010.

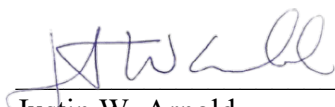
### **RELIEF REQUESTED**

WHEREFORE, the Department of Enforcement respectfully requests that the Panel:

- A. make findings of fact and conclusions of law that Respondent committed the violations charged and alleged herein;
- B. order that one or more of the sanctions provided under FINRA Rule 8310(a), be imposed, including that Respondent be required to disgorge fully any and all ill-gotten gains and/or make full and complete restitution, together with interest; and
- C. order that Respondent bear such costs of the proceeding as are deemed fair and appropriate under the circumstances in accordance with FINRA Rule 8330.

### **FINRA DEPARTMENT OF ENFORCEMENT**

Date: December 7, 2023

  
Justin W. Arnold  
Senior Litigation Counsel  
FINRA Department of Enforcement  
Brookfield Place  
200 Liberty Street, 11<sup>th</sup> Floor  
New York, NY 10281  
Phone: (206) 549-0036  
Email: justin.arnold@finra.org

John R. Baraniak, Jr.  
Litigation Director  
FINRA Department of Enforcement  
99 High Street  
Suite 900  
Boston, MA 02110  
Phone: 617-532-3423  
Email: [John.Baraniak@finra.org](mailto:John.Baraniak@finra.org)

# EXHIBIT

A

Dept. of Enforcement v. D. Allen Blankenship  
Disc. Proceeding No. 2019064333401  
Exhibit A

Item #	Customer No.	Account No.	Ticker Symbol	Buy/Sell Code	Trade Date	Principal Amount	Sum of Sales Charge	Days Held
1	Customer 2	Account 3	FDSAX	B	12/5/2017	\$10,000.00	\$ 476.00	212
2	Customer 2	Account 3	FDSAX	B	1/12/2018	\$7,250.00	\$ 341.98	174
	Customer 2	Account 3	FDSAX	S	7/5/2018	(\$43,484.56)		
3	Customer 2	Account 3	RYPDX	B	3/8/2017	\$13,500.00	\$ 641.25	356
	Customer 2	Account 3	RYPDX	S	2/27/2018	(\$42,393.91)		
4	Customer 6	Account 1	PGCOX	B	3/26/2018	\$5,000.00	\$ 288.00	119
	Customer 6	Account 1	PGCOX	S	7/23/2018	(\$45,465.98)		
5	Customer 6	Account 1	SGAAX	B	3/26/2018	\$10,400.00	\$ 595.92	318
	Customer 6	Account 1	SGAAX	S	2/7/2019	(\$12,115.65)		
6	Customer 12	Account 1	HFEAX	B	12/18/2017	\$15,000.00	\$ 861.00	290
7	Customer 12	Account 1	HFEAX	B	12/19/2017	\$19,882.85	\$ 1,143.26	289
8	Customer 12	Account 1	HFEAX	B	1/30/2018	\$10,000.00	\$ 575.00	247
	Customer 12	Account 1	HFEAX	S	10/4/2018	(\$38,006.66)		
9	Customer 12	Account 1	MMUFX	B	5/8/2018	\$10,000.00	\$ 473.00	153
	Customer 12	Account 1	MMUFX	S	10/8/2018	(\$35,590.74)		
10	Customer 22	Account 2	FDSAX	B	10/23/2017	\$15,000.00	\$ 711.54	191
	Customer 22	Account 2	FDSAX	S	5/2/2018	(\$45,845.12)		
11	Customer 22	Account 2	RYPDX	B	12/21/2017	\$6,000.00	\$ 225.60	327
	Customer 22	Account 2	RYPDX	S	11/13/2018	(\$19,014.15)		
12	Customer 24	Account 2	CWGIX	B	5/8/2017	\$11,000.00	\$ 632.50	319
13	Customer 24	Account 2	CWGIX	B	5/9/2017	\$12,000.00	\$ 690.00	318
14	Customer 24	Account 2	CWGIX	B	11/8/2017	\$9,844.26	\$ 492.21	135
	Customer 24	Account 2	CWGIX	S	3/23/2018	(\$31,735.96)		
15	Customer 24	Account 1	HFEAX	B	5/18/2018	\$15,000.00	\$ 861.00	328
16	Customer 24	Account 1	HFEAX	B	5/21/2018	\$17,500.00	\$ 1,008.00	325
17	Customer 24	Account 1	HFEAX	B	5/22/2018	\$17,500.00	\$ 1,004.50	324
	Customer 24	Account 1	HFEAX	S	4/11/2019	(\$39,292.93)		
18	Customer 25	Account 1	RRIAX	B	1/16/2018	\$19,000.00	\$ 1,094.40	357
19	Customer 25	Account 1	RRIAX	B	1/17/2018	\$19,500.00	\$ 1,121.25	356
	Customer 25	Account 1	RRIAX	S	1/8/2019	(\$31,649.25)		
20	Customer 26	Account 2	HFEAX	B	1/19/2018	\$19,800.00	\$ 1,138.50	364
	Customer 26	Account 2	HFEAX	S	1/18/2019	(\$13,549.57)		
21	Customer 26	Account 2	RRIAX	B	1/19/2018	\$19,800.00	\$ 1,136.52	364
	Customer 26	Account 2	RRIAX	S	1/18/2019	(\$16,058.92)		
22	Customer 32	Account 1	HFEAX	B	1/29/2018	\$19,500.00	\$ 1,119.30	224
23	Customer 32	Account 1	HFEAX	B	2/26/2018	\$21,000.00	\$ 1,209.60	196
24	Customer 32	Account 1	HFEAX	B	2/27/2018	\$13,900.00	\$ 626.89	195
	Customer 32	Account 1	HFEAX	S	9/10/2018	(\$45,761.43)		
25	Customer 32	Account 2	JVAAX	B	1/9/2017	\$18,000.00	\$ 943.20	364
	Customer 32	Account 2	JVAAX	S	1/8/2018	(\$36,968.42)		
26	Customer 35	Account 1	JVIAX	B	11/5/2018	\$19,750.00	\$ 1,135.63	205
27	Customer 35	Account 1	JVIAX	B	11/6/2018	\$19,750.00	\$ 612.41	204
	Customer 35	Account 1	JVIAX	S	5/29/2019	(\$25,000.00)		
	<b>Total</b>						<b>\$ 21,158.45</b>	<b>*269</b>

\*Total for days held is the average across the 27 short term trades.

**EXHIBIT**

**B**

Dept. of Enforcement v. D. Allen Blankenship  
Disc. Proceeding No. 2019064333401  
Exhibit B

Item #	Customer No.	Account No.	Solicited /Unsolicited	GDC	Price	Fund	Buy/Sell Code	Trade Date	ENF Days Sold	Amount Invested	Sales Charge %	Sales Charge	Overcharge*	Total Amount Invested
1	Customer 1	Account 1	S	\$925.00	\$37.25	EKWAX	B	6/15/2017		\$18,500.00	0.0575	\$ 1,063.75	\$ -	\$18,500.00
2	Customer 1	Account 1	U	\$900.00	\$37.31	EKWAX	B	6/19/2017		\$18,000.00	0.0576	\$ 2,102.40	\$ -	\$36,500.00
3	Customer 1	Account 1	S	\$900.00	\$18.43	FDSAX	B	12/22/2016		\$18,000.00	0.0575	\$ 1,035.00	\$ -	\$18,000.00
4	Customer 1	Account 1	U	\$900.00	\$18.45	FDSAX	B	12/23/2016		\$18,000.00	0.0575	\$ 2,070.00	\$ -	\$36,000.00
5	Customer 1	Account 1	S	\$975.00	\$32.22	FUGAX	B	10/24/2017		\$19,500.00	0.0574	\$ 1,119.30	\$ -	\$19,500.00
6	Customer 1	Account 1	U	\$125.00	\$32.13	FUGAX	B	10/25/2017		\$2,500.00	0.0576	\$ 1,267.20	\$ -	\$22,000.00
7	Customer 1	Account 1	S	\$975.00	\$7.23	HFQAX	B	10/11/2018		\$19,500.00	0.0581	\$ 1,132.95	\$ 255.45	\$19,500.00
8	Customer 1	Account 1	U	\$975.00	\$7.25	HFQAX	B	10/12/2018		\$19,500.00	0.0579	\$ 1,129.05	\$ 251.55	\$39,000.00
9	Customer 1	Account 1	U	\$550.00	\$7.25	HFQAX	B	10/15/2018		\$11,000.00	0.0579	\$ 636.90	\$ 141.90	\$50,000.00
10	Customer 1	Account 1	S	\$300.00	\$24.90	IBNAX	B	3/19/2019		\$6,000.00	0.0574	\$ 344.40	\$ 29.40	\$6,000.00
11	Customer 1	Account 1	S	\$987.50	\$24.85	IBNAX	B	3/20/2019		\$19,750.00	0.0576	\$ 1,137.60	\$ 100.73	\$25,750.00
12	Customer 1	Account 1	U	\$987.50	\$25.00	IBNAX	B	3/21/2019		\$19,750.00	0.0576	\$ 1,137.60	\$ 100.73	\$45,500.00
13	Customer 1	Account 1	U	\$847.89	\$24.56	IBNAX	B	3/22/2019		\$18,842.00	0.0525	\$ 989.21	\$ -	\$64,342.00
14	Customer 1	Account 1	S	\$875.00	\$19.36	MMUFX	B	12/22/2016		\$17,500.00	0.0573	\$ 1,002.75	\$ -	\$17,500.00
15	Customer 1	Account 1	U	\$825.00	\$19.42	MMUFX	B	12/23/2016		\$16,500.00	0.0577	\$ 952.05	\$ -	\$34,000.00
16	Customer 1	Account 1	S	\$925.00	\$22.41	PGCOX	B	6/15/2017		\$18,500.00	0.0576	\$ 1,065.60	\$ -	\$18,500.00
17	Customer 1	Account 1	U	\$900.00	\$22.62	PGCOX	B	6/19/2017		\$18,000.00	0.0575	\$ 1,035.00	\$ -	\$36,500.00
18	Customer 1	Account 1	S	\$975.00	\$14.29	RRIAX	B	1/29/2018		\$19,500.00	0.0574	\$ 1,119.30	\$ -	\$19,500.00
19	Customer 1	Account 1	U	\$875.00	\$14.25	RRIAX	B	1/31/2018		\$17,500.00	0.0575	\$ 1,006.25	\$ -	\$37,000.00
20	Customer 1	Account 1	S	\$720.00	\$60.88	RYPDX	B	12/21/2016		\$18,000.00	0.0475	\$ 855.00	\$ -	\$18,000.00
21	Customer 1	Account 1	U	\$714.00	\$60.85	RYPDX	B	12/22/2016		\$17,850.00	0.0475	\$ 847.88	\$ -	\$35,850.00
22	Customer 1	Account 1	U	\$875.00	\$20.55	SGAAX	B	5/9/2018		\$17,500.00	0.0574	\$ 1,004.50	\$ -	\$17,500.00
23	Customer 1	Account 1	U	\$325.00	\$20.66	SGAAX	B	5/10/2018		\$6,500.00	0.0576	\$ 374.40	\$ -	\$24,000.00
24	Customer 2	Account 1	S	\$950.00	\$42.66	AIVSX	B	9/14/2017		\$19,000.00	0.0574	\$ 1,090.60	\$ -	\$19,000.00
25	Customer 2	Account 1	U	\$250.00	\$42.50	AIVSX	B	9/15/2017		\$5,000.00	0.0574	\$ 287.00	\$ -	\$24,000.00
26	Customer 2	Account 1	S	\$925.00	\$32.33	FUGAX	B	9/14/2017		\$18,500.00	0.0575	\$ 1,063.75	\$ -	\$18,500.00
27	Customer 2	Account 1	U	\$975.00	\$32.40	FUGAX	B	9/15/2017		\$19,500.00	0.0574	\$ 1,119.30	\$ -	\$38,000.00
28	Customer 2	Account 1	U	\$500.00	\$32.12	FUGAX	B	9/18/2017		\$10,000.00	0.0576	\$ 576.00	\$ -	\$48,000.00
29	Customer 2	Account 1	S	\$950.00	\$14.25	IBIAX	B	9/14/2017		\$19,000.00	0.0575	\$ 1,092.50	\$ -	\$19,000.00
30	Customer 2	Account 1	U	\$500.00	\$14.24	IBIAX	B	9/15/2017		\$10,000.00	0.0576	\$ 576.00	\$ -	\$29,000.00
31	Customer 2	Account 1	S	\$950.00	\$28.85	IRSAX	B	9/14/2017		\$19,000.00	0.0575	\$ 1,092.50	\$ -	\$19,000.00
32	Customer 2	Account 1	U	\$225.00	\$28.59	IRSAX	B	9/18/2017		\$5,000.00	0.0525	\$ 262.50	\$ -	\$24,000.00
33	Customer 2	Account 1	S	\$975.00	\$34.27	JVIAX	B	10/15/2018		\$19,500.00	0.0575	\$ 1,121.25	\$ -	\$19,500.00
34	Customer 2	Account 1	S	\$975.00	\$34.90	JVIAX	B	10/16/2018		\$19,500.00	0.0576	\$ 1,123.20	\$ -	\$39,000.00
35	Customer 2	Account 1	U	\$175.00	\$34.64	JVIAX	B	10/17/2018		\$3,500.00	0.0575	\$ 201.25	\$ -	\$42,500.00
36	Customer 2	Account 1	S	\$950.00	\$21.85	MMUFX	B	9/14/2017		\$19,000.00	0.0577	\$ 1,096.30	\$ -	\$19,000.00
37	Customer 2	Account 1	U	\$975.00	\$21.79	MMUFX	B	9/15/2017		\$19,500.00	0.0574	\$ 1,119.30	\$ -	\$38,500.00
38	Customer 2	Account 1	U	\$500.00	\$21.75	MMUFX	B	9/18/2017		\$10,000.00	0.0575	\$ 575.00	\$ -	\$48,500.00
39	Customer 2	Account 2	S	\$925.00	\$18.94	FDSAX	B	3/3/2017		\$18,500.00	0.0575	\$ 1,063.75	\$ -	\$18,500.00
40	Customer 2	Account 2	U	\$241.25	\$18.85	FDSAX	B	3/6/2017		\$4,825.00	0.0573	\$ 276.47	\$ -	\$23,325.00
41	Customer 2	Account 3	S	\$900.00	\$32.34	EKWAX	B	12/20/2016		\$18,000.00	0.0575	\$ 1,035.00	\$ -	\$18,000.00
42	Customer 2	Account 3	U	\$875.00	\$32.31	EKWAX	B	12/21/2016		\$17,500.00	0.0576	\$ 1,008.00	\$ -	\$35,500.00
43	Customer 2	Account 3	S	\$912.50	\$19.28	FDSAX	B	6/13/2017		\$18,250.00	0.0576	\$ 1,051.20	\$ -	\$18,250.00
44	Customer 2	Account 3	U	\$480.00	\$19.02	FDSAX	B	6/14/2017		\$12,000.00	0.0473	\$ 567.60	\$ -	\$30,250.00
45	Customer 2	Account 3	S	\$975.00	\$35.73	HFEAX	B	2/27/2018		\$19,500.00	0.0574	\$ 1,119.30	\$ -	\$19,500.00
46	Customer 2	Account 3	U	\$987.50	\$35.38	HFEAX	B	2/28/2018		\$19,750.00	0.0574	\$ 1,133.65	\$ -	\$39,250.00
47	Customer 2	Account 3	S	\$675.00	\$24.74	IBNAX	B	12/19/2016		\$15,000.00	0.0526	\$ 789.00	\$ -	\$15,000.00
48	Customer 2	Account 3	U	\$450.00	\$24.79	IBNAX	B	12/20/2016		\$10,000.00	0.0524	\$ 524.00	\$ -	\$25,000.00
49	Customer 2	Account 3	S	\$987.50	\$25.77	IBNAX	B	5/6/2019		\$19,750.00	0.0574	\$ 1,133.65	\$ -	\$19,750.00
50	Customer 2	Account 3	U	\$830.00	\$25.46	IBNAX	B	5/7/2019		\$16,600.00	0.0574	\$ 952.84	\$ -	\$36,350.00
51	Customer 2	Account 3	S	\$840.00	\$30.74	JVIAX	B	3/2/2017		\$16,800.00	0.0576	\$ 967.68	\$ -	\$16,800.00
52	Customer 2	Account 3	U	\$750.00	\$30.81	JVIAX	B	3/3/2017		\$15,000.00	0.0574	\$ 861.00	\$ -	\$31,800.00
53	Customer 2	Account 3	U	\$750.00	\$30.73	JVIAX	B	3/6/2017		\$15,000.00	0.0576	\$ 864.00	\$ -	\$46,800.00



Dept. of Enforcement v. D. Allen Blankenship  
Disc. Proceeding No. 2019064333401  
Exhibit B

Item #	Customer No.	Account No.	Solicited /Unsolicited	GDC	Price	Fund	Buy/Sell Code	Trade Date	ENF Days Sold	Amount Invested	Sales Charge %	Sales Charge	Overcharge*	Total Amount Invested
54	Customer 2	Account 3	S	\$765.00	\$21.10	MSFBX	B	12/19/2016		\$17,000.00	0.0474	\$ 805.80	\$ -	\$17,000.00
55	Customer 2	Account 3	U	\$450.00	\$21.13	MSFBX	B	12/20/2016		\$10,000.00	0.0473	\$ 473.00	\$ -	\$27,000.00
56	Customer 2	Account 3	S	\$500.00	\$22.49	PGCOX	B	6/13/2017		\$10,000.00	0.0574	\$ 574.00	\$ -	\$10,000.00
57	Customer 2	Account 3	U	\$625.00	\$22.49	PGCOX	B	6/14/2017		\$12,500.00	0.0574	\$ 717.50	\$ -	\$22,500.00
58	Customer 2	Account 3	S	\$987.50	\$15.33	PRUAX	B	5/6/2019		\$19,750.00	0.0548	\$ 1,082.30	\$ 94.80	\$19,750.00
59	Customer 2	Account 3	U	\$747.00	\$15.23	PRUAX	B	5/7/2019		\$16,600.00	0.0499	\$ 828.34	\$ -	\$36,350.00
60	Customer 2	Account 3	S	\$750.00	\$13.27	RRIAX	B	5/1/2018	2	\$15,000.00	0.0573	\$ 859.50	\$ -	\$15,000.00
61	Customer 2	Account 3	U	\$875.00	\$13.29	RRIAX	B	5/2/2018		\$17,500.00	0.0572	\$ 1,001.00	\$ -	\$32,500.00
62	Customer 2	Account 3	U	\$512.50	\$13.34	RRIAX	B	5/3/2018		\$10,250.00	0.0577	\$ 591.43	\$ -	\$42,750.00
63	Customer 2	Account 3	S	\$600.00	\$60.82	RYPDX	B	12/19/2016		\$15,000.00	0.0475	\$ 712.50	\$ -	\$15,000.00
64	Customer 2	Account 3	S	\$700.00	\$60.78	RYPDX	B	12/20/2016		\$17,500.00	0.0475	\$ 831.25	\$ -	\$32,500.00
65	Customer 2	Account 3	S	\$975.00	\$20.71	SGAAX	B	7/5/2018		\$19,500.00	0.0575	\$ 1,121.25	\$ 195.00	\$19,500.00
66	Customer 2	Account 3	U	\$770.00	\$20.70	SGAAX	B	7/6/2018		\$19,250.00	0.0473	\$ 910.53	\$ -	\$38,750.00
67	Customer 2	Account 3	S	\$1,086.25	\$22.88	SSIZX	B	8/9/2019		\$19,750.00	0.0577	\$ 1,139.58	\$ -	\$19,750.00
68	Customer 2	Account 3	U	\$1,086.25	\$22.82	SSIZX	B	8/13/2019		\$19,750.00	0.0574	\$ 1,133.65	\$ -	\$39,500.00
69	Customer 3	Account 1	S	\$975.00	\$34.77	JVIAX	B	11/29/2018		\$19,500.00	0.0575	\$ 910.53	\$ -	\$19,500.00
70	Customer 3	Account 1	U	\$720.00	\$34.57	JVIAX	B	11/30/2018		\$14,400.00	0.0576	\$ 910.53	\$ -	\$33,900.00
71	Customer 3	Account 1	S	\$875.00	\$22.72	PGCOX	B	11/9/2017		\$17,500.00	0.0577	\$ 1,009.75	\$ -	\$17,500.00
72	Customer 3	Account 1	U	\$872.50	\$22.71	PGCOX	B	11/10/2017		\$17,450.00	0.0577	\$ 1,006.87	\$ -	\$34,950.00
73	Customer 4	Account 1	U	\$250.00	\$37.76	EKWAX	B	11/22/2017		\$5,000.00	0.0575	\$ 287.50	\$ 50.00	\$5,000.00
74	Customer 4	Account 1	U	\$780.00	\$37.19	EKWAX	B	11/24/2017		\$19,500.00	0.0476	\$ 928.20	\$ -	\$24,500.00
75	Customer 4	Account 1	U	\$532.00	\$37.47	EKWAX	B	11/27/2017		\$13,300.00	0.0475	\$ 631.75	\$ -	\$37,800.00
76	Customer 4	Account 2	S	\$248.75	\$37.45	EKWAX	B	11/9/2017		\$4,975.00	0.0574	\$ 285.57	\$ 49.25	\$42,775.00
77	Customer 4	Account 2	U	\$490.00	\$36.86	EKWAX	B	11/13/2017		\$9,800.00	0.0575	\$ 563.50	\$ 98.00	\$52,575.00
78	Customer 5	Account 1	S	\$500.00	\$36.55	JVIAX	B	4/3/2018		\$10,000.00	0.0575	\$ 575.00	\$ -	\$10,000.00
79	Customer 5	Account 1	U	\$700.00	\$36.68	JVIAX	B	4/4/2018		\$14,000.00	0.0575	\$ 805.00	\$ -	\$24,000.00
80	Customer 6	Account 1	U	\$975.00	\$19.16	FDSAX	B	7/24/2017		\$19,500.00	0.0574	\$ 1,119.30	\$ -	\$19,500.00
81	Customer 6	Account 1	U	\$465.00	\$19.30	FDSAX	B	7/25/2017		\$9,300.00	0.0575	\$ 534.75	\$ -	\$28,800.00
82	Customer 6	Account 1	S	\$975.00	\$7.76	HFQAX	B	7/23/2018		\$19,500.00	0.058	\$ 1,131.00	\$ -	\$19,500.00
83	Customer 6	Account 1	U	\$975.00	\$7.82	HFQAX	B	7/24/2018		\$19,500.00	0.0575	\$ 1,121.25	\$ -	\$39,000.00
84	Customer 6	Account 1	U	\$370.00	\$7.85	HFQAX	B	7/25/2018		\$7,400.00	0.0573	\$ 424.02	\$ -	\$46,400.00
85	Customer 6	Account 1	S	\$975.00	\$22.59	PGCOX	B	7/20/2017		\$19,500.00	0.0575	\$ 1,121.25	\$ -	\$19,500.00
86	Customer 6	Account 1	U	\$975.00	\$22.66	PGCOX	B	7/21/2017		\$19,500.00	0.0574	\$ 1,119.30	\$ -	\$39,000.00
87	Customer 6	Account 1	S	\$987.50	\$14.55	PRUAX	B	2/6/2019		\$19,750.00	0.055	\$ 1,086.25	\$ 98.75	\$19,750.00
88	Customer 6	Account 1	U	\$888.75	\$14.59	PRUAX	B	2/7/2019		\$19,750.00	0.05	\$ 987.50	\$ -	\$39,500.00
89	Customer 6	Account 1	U	\$450.00	\$14.64	PRUAX	B	2/8/2019		\$10,000.00	0.0499	\$ 499.00	\$ -	\$49,500.00
90	Customer 6	Account 1	S	\$925.00	\$18.63	SGAAX	B	7/20/2017		\$18,500.00	0.0574	\$ 1,061.90	\$ -	\$18,500.00
91	Customer 6	Account 1	U	\$250.00	\$18.59	SGAAX	B	7/21/2017		\$5,000.00	0.0576	\$ 288.00	\$ -	\$23,500.00
92	Customer 7	Account 1	S	\$500.00	\$14.92	PRUAX	B	2/19/2019		\$10,000.00	0.055	\$ 550.00	\$ 100.00	\$10,000.00
93	Customer 7	Account 1	S	\$877.50	\$14.84	PRUAX	B	2/20/2019		\$19,500.00	0.0499	\$ 973.05	\$ 95.55	\$29,500.00
94	Customer 7	Account 1	U	\$877.50	\$14.91	PRUAX	B	2/21/2019		\$19,500.00	0.0503	\$ 980.85	\$ 103.35	\$49,000.00
95	Customer 7	Account 1	U	\$160.00	\$14.86	PRUAX	B	2/22/2019		\$4,000.00	0.0451	\$ 180.40	\$ -	\$53,000.00
96	Customer 7	Account 1	S	\$740.00	\$62.88	RYPDX	B	2/9/2017		\$18,500.00	0.0476	\$ 880.60	\$ -	\$18,500.00
97	Customer 7	Account 1	U	\$696.00	\$62.93	RYPDX	B	2/10/2017		\$17,400.00	0.0475	\$ 826.50	\$ -	\$35,900.00
98	Customer 7	Account 1	S	\$649.00	\$62.88	RYPDX	B	2/13/2017		\$16,225.00	0.0476	\$ 772.31	\$ -	\$52,125.00
99	Customer 8	Account 1	S	\$886.50	\$15.87	SGGDX	B	2/15/2019		\$19,700.00	0.0498	\$ 981.06	\$ 94.56	\$19,700.00
100	Customer 8	Account 1	U	\$582.25	\$16.24	SGGDX	B	2/19/2019		\$13,700.00	0.045	\$ 616.50	\$ -	\$33,400.00
101	Customer 8	Account 2	S	\$975.00	\$7.72	HFQAX	B	8/17/2018		\$19,500.00	0.057	\$ 1,111.50	\$ 234.00	\$19,500.00
102	Customer 8	Account 2	U	\$975.00	\$7.78	HFQAX	B	8/20/2018		\$19,500.00	0.0578	\$ 1,127.10	\$ 249.60	\$39,000.00
103	Customer 9	Account 1	U	\$739.21	\$7.75	HFQAX	B	8/27/2018		\$19,712.26	0.0452	\$ 890.99	\$ -	\$19,712.26
104	Customer 9	Account 1	U	\$150.00	\$7.75	HFQAX	B	8/28/2018		\$4,000.00	0.0452	\$ 180.80	\$ -	\$23,712.26
105	Customer 9	Account 1	S	\$760.00	\$64.45	RYPDX	B	8/23/2017		\$19,000.00	0.0475	\$ 902.50	\$ -	\$19,000.00
106	Customer 9	Account 1	U	\$220.00	\$63.77	RYPDX	B	8/25/2017		\$5,500.00	0.0475	\$ 261.25	\$ -	\$24,500.00

Dept. of Enforcement v. D. Allen Blankenship  
Disc. Proceeding No. 2019064333401  
Exhibit B

Item #	Customer No.	Account No.	Solicited /Unsolicited	GDC	Price	Fund	Buy/Sell Code	Trade Date	ENF Days Sold	Amount Invested	Sales Charge %	Sales Charge	Overcharge*	Total Amount Invested
107	Customer 10	Account 1	S	\$925.00	\$19.27	FDSAX	B	6/16/2017		\$18,500.00	0.0576	\$ 1,065.60	\$ -	\$18,500.00
108	Customer 10	Account 1	U	\$107.50	\$19.38	FDSAX	B	6/19/2017		\$2,150.00	0.0573	\$ 123.20	\$ -	\$20,650.00
109	Customer 10	Account 1	S	\$987.50	\$7.58	HFQAX	B	10/2/2018		\$19,750.00	0.058	\$ 1,145.50	\$ -	\$19,750.00
110	Customer 10	Account 1	U	\$121.85	\$7.59	HFQAX	B	10/3/2018		\$2,437.08	0.058	\$ 141.35	\$ -	\$22,187.08
111	Customer 10	Account 1	S	\$925.00	\$35.13	JVIAX	B	6/16/2017		\$18,500.00	0.0575	\$ 1,063.75	\$ -	\$18,500.00
112	Customer 10	Account 1	U	\$107.50	\$35.31	JVIAX	B	6/19/2017		\$2,150.00	0.0575	\$ 123.63	\$ -	\$20,650.00
113	Customer 10	Account 1	S	\$925.00	\$22.47	PGCOX	B	6/16/2017		\$18,500.00	0.0574	\$ 1,061.90	\$ -	\$18,500.00
114	Customer 10	Account 1	U	\$107.50	\$22.62	PGCOX	B	6/19/2017		\$2,150.00	0.0575	\$ 123.63	\$ -	\$20,650.00
115	Customer 11	Account 1	S	\$750.00	\$24.42	AMECX	B	8/15/2018		\$15,000.00	0.0573	\$ 859.50	\$ 109.50	\$15,000.00
116	Customer 11	Account 1	U	\$425.00	\$24.37	AMECX	B	8/16/2018		\$10,000.00	0.0501	\$ 501.00	\$ -	\$25,000.00
117	Customer 11	Account 1	S	\$760.00	\$19.91	FKUTX	B	8/15/2018		\$19,000.00	0.0427	\$ 811.30	\$ 51.30	\$19,000.00
118	Customer 11	Account 1	S	\$780.00	\$20.10	FKUTX	B	8/16/2018		\$19,500.00	0.0423	\$ 824.85	\$ 44.85	\$38,500.00
119	Customer 11	Account 1	S	\$975.00	\$7.64	HFQAX	B	8/15/2018		\$19,500.00	0.0576	\$ 1,123.20	\$ -	\$19,500.00
120	Customer 11	Account 1	S	\$975.00	\$7.69	HFQAX	B	8/16/2018		\$19,500.00	0.0572	\$ 1,115.40	\$ -	\$39,000.00
121	Customer 11	Account 1	U	\$350.00	\$7.72	HFQAX	B	8/17/2018		\$7,000.00	0.057	\$ 399.00	\$ -	\$46,000.00
122	Customer 11	Account 1	S	\$975.00	\$36.20	JVIAX	B	8/15/2018		\$19,500.00	0.0575	\$ 1,121.25	\$ -	\$19,500.00
123	Customer 11	Account 1	S	\$975.00	\$36.35	JVIAX	B	8/16/2018		\$19,500.00	0.0575	\$ 1,121.25	\$ -	\$39,000.00
124	Customer 11	Account 1	S	\$990.00	\$16.22	PRUAX	B	8/16/2019		\$19,800.00	0.0549	\$ 1,087.02	\$ 97.02	\$19,800.00
125	Customer 11	Account 1	U	\$337.50	\$16.18	PRUAX	B	8/20/2019		\$7,500.00	0.0501	\$ 375.75	\$ -	\$27,300.00
126	Customer 11	Account 1	S	\$1,089.00	\$22.89	SSIZX	B	8/16/2019		\$19,800.00	0.0577	\$ 1,142.46	\$ 201.96	\$19,800.00
127	Customer 11	Account 1	U	\$1,089.00	\$22.85	SSIZX	B	8/19/2019		\$19,800.00	0.0573	\$ 1,134.54	\$ 194.04	\$39,600.00
128	Customer 11	Account 1	U	\$891.00	\$22.64	SSIZX	B	8/20/2019		\$19,800.00	0.0477	\$ 944.46	\$ -	\$59,400.00
129	Customer 11	Account 2	S	\$925.00	\$19.68	FDSAX	B	8/16/2018		\$18,500.00	0.0574	\$ 1,061.90	\$ -	\$18,500.00
130	Customer 11	Account 2	S	\$950.00	\$19.82	FDSAX	B	8/17/2018		\$19,000.00	0.0575	\$ 1,092.50	\$ -	\$37,500.00
131	Customer 11	Account 2	U	\$845.75	\$19.66	SGGDY	B	8/16/2019		\$19,900.00	0.0448	\$ 891.52	\$ -	\$19,900.00
132	Customer 11	Account 2	U	\$714.00	\$19.82	SGGDY	B	8/20/2019		\$16,800.00	0.0449	\$ 754.32	\$ -	\$36,700.00
133	Customer 12	Account 1	S	\$750.00	\$36.92	HFEAX	B	12/18/2017		\$15,000.00	0.0574	\$ 861.00	\$ -	\$15,000.00
134	Customer 12	Account 1	U	\$994.14	\$36.34	HFEAX	B	12/19/2017		\$19,882.85	0.0575	\$ 1,143.26	\$ -	\$34,882.85
135	Customer 12	Account 1	S	\$975.00	\$7.45	HFQAX	B	10/8/2018		\$19,500.00	0.0577	\$ 1,125.15	\$ 247.65	\$19,500.00
136	Customer 12	Account 1	U	\$900.00	\$7.45	HFQAX	B	10/9/2018		\$18,000.00	0.0577	\$ 1,038.60	\$ 228.60	\$37,500.00
137	Customer 12	Account 1	U	\$875.00	\$6.76	HFQAX	B	1/4/2019		\$17,500.00	0.0577	\$ 1,009.75	\$ 222.25	\$17,500.00
138	Customer 12	Account 1	U	\$187.50	\$6.67	HFQAX	B	1/7/2019		\$5,000.00	0.045	\$ 225.00	\$ -	\$22,500.00
139	Customer 12	Account 1	S	\$875.00	\$21.89	IAUTX	B	1/4/2019		\$17,500.00	0.0548	\$ 959.00	\$ -	\$17,500.00
140	Customer 12	Account 1	U	\$950.00	\$21.93	IAUTX	B	1/7/2019		\$19,000.00	0.0552	\$ 1,048.80	\$ -	\$36,500.00
141	Customer 12	Account 1	S	\$825.00	\$36.02	JVIAX	B	9/29/2017		\$16,500.00	0.0575	\$ 948.75	\$ 165.00	\$16,500.00
142	Customer 12	Account 1	U	\$925.00	\$36.02	JVIAX	B	10/2/2017		\$18,500.00	0.0575	\$ 1,063.75	\$ 185.00	\$35,000.00
143	Customer 12	Account 1	U	\$485.00	\$36.18	JVIAX	B	10/3/2017		\$9,700.00	0.0575	\$ 557.75	\$ 97.00	\$44,700.00
144	Customer 12	Account 1	S	\$537.50	\$21.58	MMUFY	B	9/29/2017		\$10,750.00	0.0575	\$ 618.13	\$ -	\$10,750.00
145	Customer 12	Account 1	U	\$800.00	\$21.57	MMUFY	B	10/2/2017		\$16,000.00	0.0575	\$ 920.00	\$ -	\$26,750.00
146	Customer 12	Account 1	S	\$750.00	\$22.74	PGCOX	B	9/29/2017		\$15,000.00	0.0576	\$ 864.00	\$ -	\$15,000.00
147	Customer 12	Account 1	U	\$950.00	\$22.74	PGCOX	B	10/2/2017		\$19,000.00	0.0576	\$ 1,094.40	\$ -	\$34,000.00
148	Customer 12	Account 1	S	\$992.50	\$15.38	PRUAX	B	3/13/2019		\$19,850.00	0.0553	\$ 1,097.71	\$ 105.21	\$19,850.00
149	Customer 12	Account 1	S	\$893.25	\$15.26	PRUAX	B	3/14/2019		\$19,850.00	0.0498	\$ 988.53	\$ -	\$39,700.00
150	Customer 12	Account 1	S	\$850.00	\$14.29	RRIAX	B	1/29/2018		\$17,000.00	0.0574	\$ 975.80	\$ 210.80	\$17,000.00
151	Customer 12	Account 1	U	\$875.00	\$14.19	RRIAX	B	1/30/2018		\$17,500.00	0.0578	\$ 1,011.50	\$ 224.00	\$34,500.00
152	Customer 12	Account 1	U	\$487.50	\$14.06	RRIAX	B	1/31/2018		\$13,000.00	0.0448	\$ 582.40	\$ -	\$47,500.00
153	Customer 13	Account 1	S	\$975.00	\$19.89	FDSAX	B	3/12/2018		\$19,500.00	0.0573	\$ 1,117.35	\$ -	\$19,500.00
154	Customer 13	Account 1	U	\$262.50	\$19.89	FDSAX	B	3/13/2018		\$5,250.00	0.0573	\$ 300.83	\$ -	\$24,750.00
155	Customer 13	Account 1	S	\$990.00	\$29.67	JVIAX	B	3/14/2019		\$19,800.00	0.0576	\$ 1,140.48	\$ -	\$19,800.00
156	Customer 13	Account 1	U	\$132.50	\$29.92	JVIAX	B	3/15/2019		\$2,650.00	0.0575	\$ 152.38	\$ -	\$22,450.00
157	Customer 13	Account 2	S	\$750.00	\$37.80	HFEAX	B	1/16/2018		\$15,000.00	0.0574	\$ 861.00	\$ -	\$15,000.00
158	Customer 13	Account 2	U	\$800.00	\$37.85	HFEAX	B	1/17/2018		\$16,000.00	0.0576	\$ 921.60	\$ -	\$31,000.00

Dept. of Enforcement v. D. Allen Blankenship  
Disc. Proceeding No. 2019064333401  
Exhibit B

Item #	Customer No.	Account No.	Solicited /Unsolicited	GDC	Price	Fund	Buy/Sell Code	Trade Date	ENF Days Sold	Amount Invested	Sales Charge %	Sales Charge	Overcharge*	Total Amount Invested
159	Customer 13	Account 2	S	\$888.75	\$14.15	PRUAX	B	1/18/2019		\$19,750.00	0.0502	\$ 991.45	\$ -	\$19,750.00
160	Customer 13	Account 2	U	\$888.75	\$14.12	PRUAX	B	1/22/2019		\$19,750.00	0.0503	\$ 993.43	\$ -	\$39,500.00
161	Customer 13	Account 2	U	\$280.00	\$14.16	PRUAX	B	1/23/2019		\$7,000.00	0.0452	\$ 316.40	\$ -	\$46,500.00
162	Customer 13	Account 2	S	\$750.00	\$14.23	RRIAX	B	1/16/2018		\$15,000.00	0.0576	\$ 864.00	\$ -	\$15,000.00
163	Customer 13	Account 2	U	\$800.00	\$14.26	RRIAX	B	1/17/2018		\$16,000.00	0.0575	\$ 920.00	\$ -	\$31,000.00
164	Customer 14	Account 1	S	\$975.00	\$36.36	HFEAX	B	7/26/2017		\$19,500.00	0.0575	\$ 1,121.25	\$ -	\$19,500.00
165	Customer 14	Account 1	S	\$925.00	\$36.23	HFEAX	B	7/27/2017		\$18,500.00	0.0574	\$ 1,061.90	\$ -	\$38,000.00
166	Customer 14	Account 1	S	\$925.00	\$22.10	PGCOX	B	5/23/2017		\$18,500.00	0.0575	\$ 1,063.75	\$ -	\$18,500.00
167	Customer 14	Account 1	U	\$587.50	\$22.27	PGCOX	B	5/24/2017		\$11,750.00	0.0575	\$ 675.63	\$ -	\$30,250.00
168	Customer 14	Account 1	S	\$975.00	\$18.65	SGAAX	B	7/26/2017		\$19,500.00	0.0574	\$ 1,119.30	\$ -	\$19,500.00
169	Customer 14	Account 1	S	\$925.00	\$18.63	SGAAX	B	7/27/2017		\$18,500.00	0.0574	\$ 1,061.90	\$ -	\$38,000.00
170	Customer 14	Account 2	S	\$660.00	\$18.49	FKUTX	B	1/5/2017		\$16,500.00	0.0427	\$ 704.55	\$ -	\$16,500.00
171	Customer 14	Account 2	S	\$640.00	\$18.54	FKUTX	B	1/6/2017		\$16,000.00	0.0426	\$ 681.60	\$ -	\$32,500.00
172	Customer 14	Account 2	S	\$783.75	\$34.17	JVAAX	B	1/5/2017		\$16,500.00	0.0524	\$ 864.60	\$ -	\$16,500.00
173	Customer 14	Account 2	U	\$760.00	\$34.20	JVAAX	B	1/6/2017		\$16,000.00	0.0526	\$ 841.60	\$ -	\$32,500.00
174	Customer 15	Account 1	S	\$937.50	\$18.95	FDSAX	B	4/24/2017		\$18,750.00	0.0575	\$ 1,078.13	\$ -	\$18,750.00
175	Customer 15	Account 1	U	\$462.50	\$19.11	FDSAX	B	4/25/2017		\$9,250.00	0.0576	\$ 532.80	\$ -	\$28,000.00
176	Customer 15	Account 1	S	\$975.00	\$37.15	JVIAX	B	5/30/2018		\$19,500.00	0.0576	\$ 1,123.20	\$ -	\$19,500.00
177	Customer 15	Account 1	U	\$535.00	\$37.19	JVIAX	B	5/31/2018		\$10,700.00	0.0575	\$ 615.25	\$ -	\$30,200.00
178	Customer 15	Account 1	S	\$950.00	\$23.88	MSFBX	B	4/24/2017		\$19,000.00	0.0523	\$ 993.70	\$ 91.20	\$19,000.00
179	Customer 15	Account 1	S	\$832.50	\$23.82	MSFBX	B	4/25/2017		\$18,500.00	0.0474	\$ 876.90	\$ -	\$37,500.00
180	Customer 16	Account 1	S	\$900.00	\$39.15	EKWAX	B	4/7/2017		\$18,000.00	0.0575	\$ 1,035.00	\$ -	\$18,000.00
181	Customer 16	Account 1	S	\$740.00	\$38.88	EKWAX	B	4/10/2017		\$18,500.00	0.0476	\$ 880.60	\$ -	\$36,500.00
182	Customer 16	Account 1	S	\$250.00	\$40.37	EKWAX	B	4/11/2017		\$5,000.00	0.0575	\$ 287.50	\$ -	\$41,500.00
183	Customer 16	Account 1	S	\$950.00	\$36.10	FANAX	B	4/10/2017		\$19,000.00	0.0576	\$ 1,094.40	\$ -	\$19,000.00
184	Customer 16	Account 1	S	\$625.00	\$36.11	FANAX	B	4/11/2017		\$12,500.00	0.0576	\$ 720.00	\$ -	\$31,500.00
185	Customer 16	Account 1	S	\$850.00	\$23.30	MSFBX	B	4/7/2017		\$17,000.00	0.0524	\$ 890.80	\$ 210.80	\$17,000.00
186	Customer 16	Account 1	S	\$832.50	\$23.20	MSFBX	B	4/10/2017		\$18,500.00	0.0474	\$ 876.90	\$ 136.90	\$35,500.00
187	Customer 16	Account 1	S	\$675.00	\$23.09	MSFBX	B	4/11/2017		\$18,000.00	0.0398	\$ 716.40	\$ -	\$53,500.00
188	Customer 16	Account 1	S	\$646.88	\$23.20	MSFBX	B	4/12/2017		\$17,250.00	0.0401	\$ 691.73	\$ -	\$70,750.00
189	Customer 16	Account 2	S	\$925.00	\$18.77	FDSAX	B	4/7/2017		\$18,500.00	0.0575	\$ 1,063.75	\$ 185.00	\$18,500.00
190	Customer 16	Account 2	S	\$900.00	\$18.79	FDSAX	B	4/10/2017		\$18,000.00	0.0575	\$ 1,035.00	\$ 180.00	\$36,500.00
191	Customer 16	Account 2	S	\$700.00	\$18.62	FDSAX	B	4/11/2017		\$17,500.00	0.0473	\$ 827.75	\$ -	\$54,000.00
192	Customer 16	Account 2	U	\$330.00	\$18.56	FDSAX	B	4/12/2017		\$8,250.00	0.0474	\$ 391.05	\$ -	\$62,250.00
193	Customer 16	Account 2	U	\$900.00	\$33.18	JVIAX	B	12/10/2018		\$18,000.00	0.0576	\$ 1,036.80	\$ -	\$18,000.00
194	Customer 16	Account 2	U	\$765.00	\$32.94	JVIAX	B	12/11/2018		\$18,000.00	0.0474	\$ 853.20	\$ -	\$36,000.00
195	Customer 16	Account 2	S	\$675.00	\$18.40	SGGDY	B	4/7/2017		\$15,000.00	0.05	\$ 750.00	\$ 75.00	\$15,000.00
196	Customer 16	Account 2	S	\$456.88	\$18.32	SGGDY	B	4/10/2017		\$10,750.00	0.0448	\$ 481.60	\$ -	\$25,750.00
197	Customer 16	Account 2	U	\$350.63	\$18.84	SGGDY	B	4/12/2017		\$8,250.00	0.0451	\$ 372.08	\$ -	\$34,000.00
198	Customer 17	Account 1	S	\$875.00	\$24.66	IBNAX	B	5/30/2019		\$17,500.00	0.0576	\$ 1,008.00	\$ -	\$17,500.00
199	Customer 17	Account 1	S	\$835.12	\$24.51	IBNAX	B	5/31/2019		\$16,702.49	0.0575	\$ 960.39	\$ -	\$34,202.49
200	Customer 18	Account 1	S	\$750.00	\$36.99	HFEAX	B	10/2/2017		\$15,000.00	0.0576	\$ 864.00	\$ -	\$15,000.00
201	Customer 18	Account 1	U	\$500.00	\$36.90	HFEAX	B	10/3/2017		\$10,000.00	0.0575	\$ 575.00	\$ -	\$25,000.00
202	Customer 18	Account 1	S	\$975.00	\$7.28	HFQAX	B	11/2/2018		\$19,500.00	0.0577	\$ 1,125.15	\$ -	\$19,500.00
203	Customer 18	Account 1	S	\$731.25	\$7.21	HFQAX	B	11/5/2018		\$19,500.00	0.0577	\$ 1,125.15	\$ -	\$39,000.00
204	Customer 18	Account 1	S	\$990.00	\$34.53	JVIAX	B	11/2/2018		\$19,800.00	0.0576	\$ 1,140.48	\$ 199.98	\$19,800.00
205	Customer 18	Account 1	U	\$975.00	\$34.45	JVIAX	B	11/5/2018		\$19,500.00	0.0575	\$ 1,121.25	\$ 195.00	\$39,300.00
206	Customer 18	Account 1	S	\$680.00	\$34.10	JVIAX	B	11/6/2018		\$16,000.00	0.0475	\$ 760.00	\$ -	\$55,300.00
207	Customer 18	Account 1	S	\$900.00	\$22.74	PGCOX	B	10/2/2017		\$18,000.00	0.0576	\$ 1,036.80	\$ -	\$18,000.00
208	Customer 18	Account 1	U	\$750.00	\$22.80	PGCOX	B	10/3/2017		\$15,000.00	0.0575	\$ 862.50	\$ -	\$33,000.00
209	Customer 18	Account 1	S	\$641.88	\$12.60	PONAX	B	7/10/2019		\$19,750.00	0.0373	\$ 736.68	\$ -	\$19,750.00
210	Customer 18	Account 1	U	\$316.88	\$12.60	PONAX	B	7/11/2019		\$9,750.00	0.0373	\$ 363.68	\$ -	\$29,500.00
211	Customer 18	Account 1	S	\$1,086.25	\$22.76	SSIZX	B	7/10/2019		\$19,750.00	0.0576	\$ 1,137.60	\$ -	\$19,750.00
212	Customer 18	Account 1	U	\$536.25	\$22.75	SSIZX	B	7/11/2019		\$9,750.00	0.0576	\$ 561.60	\$ -	\$29,500.00
213	Customer 19	Account 1	S	\$880.00	\$18.62	FDSAX	B	2/13/2017		\$17,600.00	0.0575	\$ 1,012.00	\$ -	\$17,600.00

Dept. of Enforcement v. D. Allen Blankenship  
Disc. Proceeding No. 2019064333401  
Exhibit B

Item #	Customer No.	Account No.	Solicited /Unsolicited	GDC	Price	Fund	Buy/Sell Code	Trade Date	ENF Days Sold	Amount Invested	Sales Charge %	Sales Charge	Overcharge*	Total Amount Invested
214	Customer 19	Account 1	S	\$925.00	\$18.67	FDSAX	B	2/14/2017		\$18,500.00	0.0573	\$ 1,060.05	\$ -	\$36,100.00
215	Customer 19	Account 1	S	\$987.50	\$34.53	JVIAX	B	11/2/2018		\$19,750.00	0.0576	\$ 1,137.60	\$ 199.48	\$19,750.00
216	Customer 19	Account 1	S	\$987.50	\$34.45	JVIAX	B	11/5/2018		\$19,750.00	0.0575	\$ 1,135.63	\$ 197.50	\$39,500.00
217	Customer 19	Account 1	S	\$847.88	\$34.10	JVIAX	B	11/6/2018		\$19,950.00	0.0475	\$ 947.63	\$ -	\$59,450.00
218	Customer 19	Account 1	S	\$600.00	\$62.88	RYPDX	B	2/13/2017		\$15,000.00	0.0475	\$ 712.50	\$ -	\$15,000.00
219	Customer 19	Account 1	S	\$670.00	\$62.89	RYPDX	B	2/14/2017		\$16,750.00	0.0475	\$ 795.63	\$ -	\$31,750.00
220	Customer 19	Account 1	U	\$400.00	\$63.37	RYPDX	B	2/15/2017		\$10,000.00	0.0475	\$ 475.00	\$ -	\$41,750.00
221	Customer 19	Account 1	S	\$675.00	\$18.86	SGGDx	B	2/13/2017		\$15,000.00	0.0498	\$ 747.00	\$ -	\$15,000.00
222	Customer 19	Account 1	U	\$225.00	\$18.82	SGGDx	B	2/14/2017		\$5,000.00	0.0499	\$ 249.50	\$ -	\$20,000.00
223	Customer 20	Account 1	S	\$995.00	\$30.53	JVIAX	B	5/20/2019		\$19,900.00	0.0576	\$ 1,146.24	\$ -	\$19,900.00
224	Customer 20	Account 1	U	\$80.00	\$30.54	JVIAX	B	5/21/2019		\$1,600.00	0.0576	\$ 92.16	\$ -	\$21,500.00
225	Customer 20	Account 1	S	\$995.00	\$15.57	PRUAX	B	5/20/2019		\$19,900.00	0.0552	\$ 1,098.48	\$ -	\$19,900.00
226	Customer 20	Account 1	U	\$80.00	\$15.62	PRUAX	B	5/21/2019		\$1,600.00	0.0551	\$ 88.16	\$ -	\$21,500.00
227	Customer 21	Account 1	S	\$995.00	\$7.00	HFQAX	B	5/23/2019		\$19,900.00	0.0571	\$ 1,136.29	\$ 240.79	\$19,900.00
228	Customer 21	Account 1	S	\$995.00	\$7.06	HFQAX	B	5/24/2019		\$19,900.00	0.0581	\$ 1,156.19	\$ 260.69	\$39,800.00
229	Customer 21	Account 1	U	\$529.69	\$6.91	HFQAX	B	5/28/2019		\$14,125.00	0.0449	\$ 634.21	\$ -	\$53,925.00
230	Customer 21	Account 1	S	\$895.50	\$14.86	SGGDx	B	5/23/2019		\$19,900.00	0.0498	\$ 991.02	\$ 344.27	\$19,900.00
231	Customer 21	Account 1	S	\$845.75	\$14.82	SGGDx	B	5/24/2019		\$19,900.00	0.0452	\$ 899.48	\$ 252.73	\$39,800.00
232	Customer 21	Account 1	U	\$529.69	\$14.65	SGGDx	B	5/28/2019		\$14,125.00	0.0403	\$ 569.24	\$ 110.18	\$53,925.00
233	Customer 21	Account 1	U	\$656.25	\$19.42	SGGDx	B	8/13/2019		\$17,500.00	0.0402	\$ 703.50	\$ 134.75	\$17,500.00
234	Customer 21	Account 1	U	\$371.25	\$19.48	SGGDx	B	8/14/2019		\$9,900.00	0.04	\$ 396.00	\$ 74.25	\$27,400.00
235	Customer 22	Account 1	S	\$740.63	\$7.13	HFQAX	B	11/13/2018		\$19,750.00	0.0449	\$ 886.78	\$ 195.53	\$19,750.00
236	Customer 22	Account 1	S	\$740.63	\$7.14	HFQAX	B	11/14/2018		\$19,750.00	0.0448	\$ 884.80	\$ 193.55	\$39,500.00
237	Customer 22	Account 1	U	\$536.25	\$7.06	HFQAX	B	11/15/2018		\$19,500.00	0.0354	\$ 690.30	\$ -	\$59,000.00
238	Customer 22	Account 1	S	\$975.00	\$25.68	IBNAX	B	4/22/2019		\$19,500.00	0.0576	\$ 1,123.20	\$ 99.45	\$19,500.00
239	Customer 22	Account 1	U	\$877.50	\$25.70	IBNAX	B	4/23/2019		\$19,500.00	0.0525	\$ 1,023.75	\$ -	\$39,000.00
240	Customer 22	Account 1	U	\$283.50	\$25.73	IBNAX	B	4/24/2019		\$6,300.00	0.0525	\$ 330.75	\$ -	\$45,300.00
241	Customer 22	Account 1	U	\$950.00	\$35.07	JVIAX	B	6/23/2017		\$19,000.00	0.0576	\$ 1,094.40	\$ 381.90	\$19,000.00
242	Customer 22	Account 1	U	\$950.00	\$35.23	JVIAX	B	6/26/2017		\$19,000.00	0.0576	\$ 1,094.40	\$ 381.90	\$38,000.00
243	Customer 22	Account 1	U	\$485.00	\$35.19	JVIAX	B	6/27/2017		\$9,700.00	0.0574	\$ 556.78	\$ 193.03	\$47,700.00
244	Customer 22	Account 2	S	\$672.00	\$18.55	FDSAX	B	4/21/2017		\$16,800.00	0.0474	\$ 796.32	\$ -	\$16,800.00
245	Customer 22	Account 2	U	\$780.00	\$18.91	FDSAX	B	4/25/2017		\$19,500.00	0.0476	\$ 928.20	\$ -	\$36,300.00
246	Customer 22	Account 3	S	\$975.00	\$25.68	IBNAX	B	4/22/2019		\$19,500.00	0.0576	\$ 1,123.20	\$ -	\$19,500.00
247	Customer 22	Account 3	U	\$216.00	\$25.73	IBNAX	B	4/24/2019		\$4,800.00	0.0525	\$ 252.00	\$ -	\$24,300.00
248	Customer 22	Account 4	S	\$835.13	\$33.67	JVIAX	B	11/13/2018		\$19,650.00	0.0475	\$ 933.38	\$ -	\$19,650.00
249	Customer 22	Account 4	S	\$828.75	\$33.88	JVIAX	B	11/14/2018		\$19,500.00	0.0475	\$ 926.25	\$ -	\$39,150.00
250	Customer 22	Account 4	S	\$950.00	\$22.60	PGCOX	B	6/23/2017		\$19,000.00	0.0575	\$ 1,092.50	\$ -	\$19,000.00
251	Customer 22	Account 4	U	\$950.00	\$22.63	PGCOX	B	6/26/2017		\$19,000.00	0.0574	\$ 1,090.60	\$ -	\$38,000.00
252	Customer 22	Account 4	U	\$514.31	\$22.51	PGCOX	B	6/27/2017		\$10,286.27	0.0573	\$ 589.40	\$ -	\$48,286.27
253	Customer 22	Account 4	S	\$832.50	\$15.25	PRUAX	B	5/6/2019		\$18,500.00	0.0498	\$ 921.30	\$ -	\$18,500.00
254	Customer 22	Account 4	U	\$315.00	\$15.23	PRUAX	B	5/7/2019		\$7,000.00	0.0499	\$ 349.30	\$ -	\$25,500.00
255	Customer 23	Account 1	S	\$975.00	\$36.82	JVIAX	B	6/25/2018		\$19,500.00	0.0576	\$ 1,123.20	\$ -	\$19,500.00
256	Customer 23	Account 1	U	\$167.50	\$36.77	JVIAX	B	6/26/2018		\$3,350.00	0.0574	\$ 192.29	\$ -	\$22,850.00
257	Customer 23	Account 1	S	\$975.00	\$26.03	MSFBX	B	6/25/2018		\$19,500.00	0.0526	\$ 1,025.70	\$ -	\$19,500.00
258	Customer 23	Account 1	U	\$167.50	\$25.95	MSFBX	B	6/26/2018		\$3,350.00	0.0524	\$ 175.54	\$ -	\$22,850.00
259	Customer 24**	Account 2	S	\$550.00	\$51.31	CWGIX	B	5/8/2017		\$11,000.00	0.0575	\$ 632.50	\$ 82.50	\$11,000.00
260	Customer 24**	Account 2	U	\$600.00	\$51.31	CWGIX	B	5/9/2017		\$12,000.00	0.0575	\$ 690.00	\$ 90.00	\$23,000.00
261	Customer 24	Account 2	S	\$747.00	\$39.72	MGIAX	B	8/15/2016		\$18,675.00	0.0476	\$ 888.93	\$ -	\$18,675.00
262	Customer 24	Account 2	U	\$750.00	\$39.33	MGIAX	B	8/22/2016		\$18,750.00	0.0475	\$ 890.63	\$ -	\$37,425.00
263	Customer 24	Account 1	S	\$750.00	\$18.27	FDSAX	B	8/15/2016		\$15,000.00	0.0575	\$ 862.50	\$ -	\$15,000.00
264	Customer 24	Account 1	U	\$750.00	\$18.22	FDSAX	B	8/22/2016		\$15,000.00	0.0576	\$ 864.00	\$ -	\$30,000.00
265	Customer 24	Account 1	S	\$740.00	\$19.50	FKUTX	B	5/4/2017		\$18,500.00	0.0426	\$ 788.10	\$ -	\$18,500.00
266	Customer 24	Account 1	U	\$720.00	\$19.61	FKUTX	B	5/5/2017		\$18,000.00	0.0423	\$ 761.40	\$ -	\$36,500.00

Dept. of Enforcement v. D. Allen Blankenship  
Disc. Proceeding No. 2019064333401  
Exhibit B

Item #	Customer No.	Account No.	Solicited /Unsolicited	GDC	Price	Fund	Buy/Sell Code	Trade Date	ENF Days Sold	Amount Invested	Sales Charge %	Sales Charge	Overcharge*	Total Amount Invested
267	Customer 24	Account 1	U	\$760.00	\$20.86	FKUTX	B	11/20/2017		\$19,000.00	0.0427	\$ 811.30	-	\$19,000.00
268	Customer 24	Account 1	U	\$400.00	\$20.90	FKUTX	B	11/21/2017		\$10,000.00	0.0426	\$ 426.00	-	\$29,000.00
269	Customer 24	Account 1	S	\$525.00	\$20.88	FKUTX	B	4/8/2019		\$15,000.00	0.0374	\$ 561.00	-	\$15,000.00
270	Customer 24	Account 1	S	\$350.00	\$20.85	FKUTX	B	4/10/2019		\$10,000.00	0.0374	\$ 374.00	-	\$25,000.00
271	Customer 24	Account 1	S	\$925.00	\$10.12	GAUAX	B	2/13/2017		\$18,500.00	0.0573	\$ 1,060.05	\$ 181.30	\$18,500.00
272	Customer 24	Account 1	U	\$925.00	\$10.08	GAUAX	B	2/14/2017		\$18,500.00	0.0575	\$ 1,063.75	\$ 185.00	\$37,000.00
273	Customer 24	Account 1	U	\$640.00	\$9.95	GAUAX	B	2/15/2017		\$16,000.00	0.0472	\$ 755.20	-	\$53,000.00
274	Customer 24**	Account 1	U	\$750.00	\$35.90	HFEAX	B	5/18/2018		\$15,000.00	0.0574	\$ 861.00	\$ 186.00	\$15,000.00
275	Customer 24**	Account 1	U	\$875.00	\$35.96	HFEAX	B	5/21/2018		\$17,500.00	0.0576	\$ 1,008.00	\$ 220.50	\$32,500.00
276	Customer 24**	Account 1	U	\$875.00	\$36.05	HFEAX	B	5/22/2018		\$17,500.00	0.0574	\$ 1,004.50	\$ 217.00	\$50,000.00
277	Customer 24	Account 1	S	\$731.25	\$27.31	HFOAX	B	11/14/2018		\$19,500.00	0.045	\$ 877.50	-	\$19,500.00
278	Customer 24	Account 1	U	\$731.25	\$27.41	HFOAX	B	11/15/2018		\$19,500.00	0.0449	\$ 875.55	-	\$39,000.00
279	Customer 24	Account 1	U	\$637.50	\$27.32	HFOAX	B	11/16/2018		\$17,000.00	0.045	\$ 765.00	-	\$56,000.00
280	Customer 24	Account 1	U	\$536.25	\$26.82	HFOAX	B	11/19/2018		\$19,500.00	0.035	\$ 682.50	-	\$75,500.00
281	Customer 24	Account 1	U	\$912.50	\$24.90	IBNAX	B	11/8/2016		\$18,250.00	0.0574	\$ 1,047.55	\$ 89.43	\$18,250.00
282	Customer 24	Account 1	U	\$750.00	\$25.01	IBNAX	B	11/9/2016		\$15,000.00	0.0576	\$ 864.00	\$ 76.50	\$33,250.00
283	Customer 24	Account 1	S	\$825.00	\$25.05	IBNAX	B	11/10/2016		\$16,500.00	0.0575	\$ 948.75	\$ 82.50	\$49,750.00
284	Customer 24	Account 1	U	\$832.50	\$24.83	IBNAX	B	11/11/2016		\$18,500.00	0.0524	\$ 969.40	-	\$68,250.00
285	Customer 24	Account 1	U	\$742.50	\$24.87	IBNAX	B	11/15/2016		\$16,500.00	0.0527	\$ 869.55	-	\$84,750.00
286	Customer 24	Account 1	U	\$450.00	\$24.88	IBNAX	B	11/16/2016		\$10,000.00	0.0527	\$ 527.00	-	\$94,750.00
287	Customer 24	Account 1	S	\$875.00	\$25.39	IBNAX	B	4/8/2019		\$17,500.00	0.0575	\$ 1,006.25	\$ 87.50	\$17,500.00
288	Customer 24	Account 1	U	\$990.00	\$25.26	IBNAX	B	4/9/2019		\$19,800.00	0.0574	\$ 1,136.52	\$ 97.02	\$37,300.00
289	Customer 24	Account 1	S	\$893.25	\$25.20	IBNAX	B	4/10/2019		\$19,850.00	0.0524	\$ 1,040.14	-	\$57,150.00
290	Customer 24	Account 1	U	\$893.25	\$25.18	IBNAX	B	4/11/2019		\$19,850.00	0.0524	\$ 1,040.14	-	\$77,000.00
291	Customer 24	Account 1	U	\$675.00	\$25.29	IBNAX	B	4/12/2019		\$15,000.00	0.0526	\$ 789.00	-	\$92,000.00
292	Customer 24	Account 1	S	\$750.00	\$37.15	IGAAX	B	5/18/2018		\$15,000.00	0.0576	\$ 864.00	\$ 114.00	\$15,000.00
293	Customer 24	Account 1	S	\$637.50	\$37.05	IGAAX	B	5/21/2018		\$15,000.00	0.0499	\$ 748.50	-	\$30,000.00
294	Customer 24	Account 1	S	\$875.00	\$30.20	JVIAX	B	2/13/2017		\$17,500.00	0.0576	\$ 1,008.00	\$ 176.75	\$17,500.00
295	Customer 24	Account 1	S	\$900.00	\$30.04	JVIAX	B	2/14/2017		\$18,000.00	0.0576	\$ 1,036.80	\$ 181.80	\$35,500.00
296	Customer 24	Account 1	S	\$773.50	\$29.88	JVIAX	B	2/15/2017		\$18,200.00	0.0475	\$ 864.50	-	\$53,700.00
297	Customer 24	Account 1	S	\$828.75	\$33.88	JVIAX	B	11/14/2018		\$19,500.00	0.0475	\$ 926.25	\$ 195.00	\$19,500.00
298	Customer 24	Account 1	U	\$633.75	\$33.50	JVIAX	B	11/15/2018		\$19,500.00	0.0376	\$ 733.20	-	\$39,000.00
299	Customer 24	Account 1	U	\$552.50	\$33.68	JVIAX	B	11/16/2018		\$17,000.00	0.0374	\$ 635.80	-	\$56,000.00
300	Customer 24	Account 1	S	\$990.00	\$15.39	PRUAX	B	4/8/2019		\$19,800.00	0.0552	\$ 1,092.96	\$ 201.96	\$19,800.00
301	Customer 24	Account 1	U	\$891.00	\$15.31	PRUAX	B	4/9/2019		\$19,800.00	0.0503	\$ 995.94	\$ 104.94	\$39,600.00
302	Customer 24	Account 1	U	\$794.00	\$15.21	PRUAX	B	4/10/2019		\$19,850.00	0.0447	\$ 887.30	-	\$59,450.00
303	Customer 24	Account 1	S	\$987.50	\$14.21	RRIAX	B	1/12/2018		\$19,750.00	0.0577	\$ 1,139.58	\$ 250.83	\$19,750.00
304	Customer 24	Account 1	U	\$987.50	\$14.23	RRIAX	B	1/16/2018		\$19,750.00	0.0576	\$ 1,137.60	\$ 248.85	\$39,500.00
305	Customer 24	Account 1	U	\$712.50	\$14.07	RRIAX	B	1/17/2018		\$19,000.00	0.0448	\$ 851.20	-	\$58,500.00
306	Customer 24	Account 1	U	\$731.25	\$14.10	RRIAX	B	1/19/2018		\$19,500.00	0.0447	\$ 871.65	-	\$78,000.00
307	Customer 24	Account 1	S	\$962.00	\$21.25	RRRAX	B	5/4/2017		\$18,500.00	0.0574	\$ 1,061.90	-	\$18,500.00
308	Customer 24	Account 1	U	\$936.00	\$21.41	RRRAX	B	5/5/2017		\$18,000.00	0.0574	\$ 1,033.20	-	\$36,500.00
309	Customer 24	Account 1	U	\$540.80	\$21.24	RRRAX	B	5/8/2017		\$10,400.00	0.0574	\$ 596.96	-	\$46,900.00
310	Customer 24	Account 1	U	\$640.00	\$62.85	RYPD	B	11/8/2016		\$16,000.00	0.0476	\$ 761.60	-	\$16,000.00
311	Customer 24	Account 1	U	\$600.00	\$61.78	RYPD	B	11/9/2016		\$15,000.00	0.0474	\$ 711.00	-	\$31,000.00
312	Customer 25	Account 1	S	\$900.00	\$19.09	FDSAX	B	6/6/2017		\$18,000.00	0.0576	\$ 1,036.80	-	\$18,000.00
313	Customer 25	Account 1	U	\$911.15	\$19.09	FDSAX	B	6/7/2017		\$18,223.00	0.0576	\$ 1,049.64	-	\$36,223.00
314	Customer 25	Account 1	S	\$975.00	\$7.73	HFQAX	B	7/16/2018		\$19,500.00	0.0569	\$ 1,109.55	\$ 232.05	\$19,500.00
315	Customer 25	Account 1	U	\$975.00	\$7.72	HFQAX	B	7/17/2018		\$19,500.00	0.057	\$ 1,111.50	\$ 234.00	\$39,000.00
316	Customer 25	Account 1	S	\$731.25	\$7.64	HFQAX	B	7/18/2018		\$19,500.00	0.0445	\$ 867.75	-	\$58,500.00
317	Customer 25	Account 1	S	\$990.00	\$25.68	IBNAX	B	4/22/2019		\$19,800.00	0.0576	\$ 1,140.48	\$ 100.98	\$19,800.00
318	Customer 25	Account 1	U	\$787.50	\$25.70	IBNAX	B	4/23/2019		\$17,500.00	0.0525	\$ 918.75	-	\$37,300.00
319	Customer 25	Account 1	S	\$975.00	\$37.19	JVIAX	B	4/16/2018		\$19,500.00	0.0575	\$ 1,121.25	-	\$19,500.00
320	Customer 25	Account 1	U	\$975.00	\$37.41	JVIAX	B	4/17/2018		\$19,500.00	0.0575	\$ 1,121.25	-	\$39,000.00
321	Customer 25	Account 1	U	\$300.00	\$37.42	JVIAX	B	4/18/2018		\$6,000.00	0.0575	\$ 345.00	-	\$45,000.00

Dept. of Enforcement v. D. Allen Blankenship  
Disc. Proceeding No. 2019064333401  
Exhibit B

Item #	Customer No.	Account No.	Solicited /Unsolicited	GDC	Price	Fund	Buy/Sell Code	Trade Date	ENF Days Sold	Amount Invested	Sales Charge %	Sales Charge	Overcharge*	Total Amount Invested
322	Customer 25	Account 1	S	\$900.00	\$22.67	PGCOX	B	6/6/2017		\$18,000.00	0.0573	\$ 1,031.40	\$ -	\$18,000.00
323	Customer 25	Account 1	U	\$901.70	\$22.67	PGCOX	B	6/7/2017		\$18,034.00	0.0573	\$ 1,033.35	\$ -	\$36,034.00
324	Customer 25	Account 1	U	\$450.00	\$22.57	PGCOX	B	6/8/2017		\$9,000.00	0.0576	\$ 518.40	\$ -	\$45,034.00
325	Customer 25	Account 1	S	\$975.00	\$13.86	PRUAX	B	1/7/2019		\$19,500.00	0.0548	\$ 1,068.60	\$ 93.60	\$19,500.00
326	Customer 25	Account 1	U	\$756.00	\$13.95	PRUAX	B	1/8/2019		\$16,800.00	0.0502	\$ 843.36	\$ -	\$36,300.00
327	Customer 25	Account 1	S	\$950.00	\$14.23	RRIAX	B	1/16/2018		\$19,000.00	0.0576	\$ 1,094.40	\$ -	\$19,000.00
328	Customer 25	Account 1	U	\$975.00	\$14.26	RRIAX	B	1/17/2018		\$19,500.00	0.0575	\$ 1,121.25	\$ -	\$38,500.00
329	Customer 26	Account 1	S	\$780.00	\$19.92	FDSAX	B	11/10/2017		\$19,500.00	0.0477	\$ 930.15	\$ -	\$19,500.00
330	Customer 26	Account 1	U	\$790.00	\$19.83	FDSAX	B	11/13/2017		\$19,750.00	0.0474	\$ 936.15	\$ -	\$39,250.00
331	Customer 26	Account 2	S	\$975.00	\$14.22	PRUAX	B	1/18/2019		\$19,500.00	0.0549	\$ 1,070.55	\$ 193.05	\$19,500.00
332	Customer 26	Account 2	U	\$877.50	\$14.12	PRUAX	B	1/22/2019		\$19,500.00	0.053	\$ 1,033.50	\$ 156.00	\$39,000.00
333	Customer 26	Account 2	U	\$496.00	\$14.16	PRUAX	B	1/23/2019		\$12,400.00	0.0452	\$ 560.48	\$ -	\$51,400.00
334	Customer 26	Account 2	S	\$780.00	\$63.81	RYPD	B	8/31/2017		\$19,500.00	0.0475	\$ 926.25	\$ -	\$19,500.00
335	Customer 26	Account 2	U	\$420.00	\$64.15	RYPD	B	9/1/2017		\$10,500.00	0.0475	\$ 498.75	\$ -	\$30,000.00
336	Customer 27	Account 1	S	\$625.00	\$14.33	AGREX	B	6/11/2018		\$12,500.00	0.0551	\$ 688.75	\$ -	\$12,500.00
337	Customer 27	Account 1	U	\$375.00	\$14.35	AGREX	B	6/12/2018		\$7,500.00	0.0551	\$ 413.25	\$ -	\$20,000.00
338	Customer 27	Account 1	S	\$750.00	\$50.10	AWSHX	B	6/11/2018		\$15,000.00	0.0575	\$ 862.50	\$ 112.50	\$15,000.00
339	Customer 27	Account 1	U	\$425.00	\$49.72	AWSHX	B	6/12/2018		\$10,000.00	0.0501	\$ 501.00	\$ -	\$25,000.00
340	Customer 27	Account 1	S	\$975.00	\$19.29	FDSAX	B	6/11/2018		\$19,500.00	0.0575	\$ 1,121.25	\$ 195.00	\$19,500.00
341	Customer 27	Account 1	U	\$975.00	\$19.28	FDSAX	B	6/12/2018		\$19,500.00	0.0576	\$ 1,123.20	\$ 196.95	\$39,000.00
342	Customer 27	Account 1	S	\$680.00	\$18.14	FKUTX	B	6/12/2018		\$17,000.00	0.0424	\$ 720.80	\$ 40.80	\$17,000.00
343	Customer 27	Account 1	U	\$520.00	\$18.39	FKUTX	B	6/15/2018		\$13,000.00	0.0424	\$ 551.20	\$ 31.20	\$30,000.00
344	Customer 27	Account 1	S	\$691.25	\$21.83	FKUTX	B	6/18/2019		\$19,750.00	0.0376	\$ 742.60	\$ -	\$49,750.00
345	Customer 27	Account 1	S	\$975.00	\$6.64	HFQAX	B	1/2/2019		\$19,500.00	0.0572	\$ 1,115.40	\$ 237.90	\$19,500.00
346	Customer 27	Account 1	U	\$975.00	\$6.60	HFQAX	B	1/3/2019		\$19,500.00	0.0576	\$ 1,123.20	\$ 245.70	\$39,000.00
347	Customer 27	Account 1	U	\$731.25	\$6.67	HFQAX	B	1/4/2019		\$19,500.00	0.045	\$ 877.50	\$ -	\$58,500.00
348	Customer 27	Account 1	U	\$125.63	\$6.67	HFQAX	B	1/7/2019		\$3,350.00	0.045	\$ 150.75	\$ -	\$61,850.00
349	Customer 28	Account 1	S	\$755.00	\$10.05	GAUAX	B	5/3/2017		\$15,100.00	0.0577	\$ 871.27	\$ -	\$15,100.00
350	Customer 28	Account 1	U	\$715.00	\$10.13	GAUAX	B	5/5/2017		\$14,300.00	0.0573	\$ 819.39	\$ -	\$29,400.00
351	Customer 28	Account 1	S	\$750.00	\$37.73	HFEAX	B	1/5/2018		\$15,000.00	0.0575	\$ 862.50	\$ -	\$15,000.00
352	Customer 28	Account 1	U	\$740.00	\$37.22	HFEAX	B	1/8/2018		\$14,800.00	0.0575	\$ 851.00	\$ -	\$29,800.00
353	Customer 28	Account 1	S	\$950.00	\$35.53	JVIAX	B	7/31/2017		\$19,000.00	0.0574	\$ 1,090.60	\$ -	\$19,000.00
354	Customer 28	Account 1	U	\$950.00	\$35.66	JVIAX	B	8/1/2017		\$19,000.00	0.0575	\$ 1,092.50	\$ -	\$38,000.00
355	Customer 28	Account 1	S	\$950.00	\$25.01	MSFBX	B	8/1/2017		\$19,000.00	0.0524	\$ 995.60	\$ 93.10	\$19,000.00
356	Customer 28	Account 1	U	\$330.75	\$24.79	MSFBX	B	8/2/2017		\$7,350.00	0.0476	\$ 349.86	\$ -	\$26,350.00
357	Customer 28	Account 1	S	\$540.00	\$25.46	MSFBX	B	1/3/2018		\$12,000.00	0.0475	\$ 570.00	\$ 90.00	\$12,000.00
358	Customer 28	Account 1	U	\$513.84	\$25.61	MSFBX	B	1/5/2018		\$13,702.51	0.0398	\$ 545.36	\$ -	\$25,702.51
359	Customer 28	Account 1	S	\$900.00	\$22.49	PGCOX	B	6/13/2017		\$18,000.00	0.0574	\$ 1,033.20	\$ -	\$18,000.00
360	Customer 28	Account 1	U	\$925.00	\$22.49	PGCOX	B	6/14/2017		\$18,500.00	0.0574	\$ 1,061.90	\$ -	\$36,500.00
361	Customer 28	Account 1	U	\$505.00	\$22.41	PGCOX	B	6/15/2017		\$10,100.00	0.0576	\$ 581.76	\$ -	\$46,600.00
362	Customer 28	Account 1	S	\$850.00	\$15.41	PRUAX	B	4/2/2019		\$17,000.00	0.0552	\$ 938.40	\$ 173.40	\$17,000.00
363	Customer 28	Account 1	U	\$765.00	\$15.25	PRUAX	B	4/4/2019		\$17,000.00	0.0498	\$ 846.60	\$ 81.60	\$34,000.00
364	Customer 28	Account 1	S	\$794.88	\$15.31	PRUAX	B	4/5/2019		\$19,872.03	0.0451	\$ 896.23	\$ -	\$53,872.03
365	Customer 28	Account 1	S	\$975.00	\$21.15	SGAAX	B	7/23/2018		\$19,500.00	0.0577	\$ 1,125.15	\$ 198.90	\$19,500.00
366	Customer 28	Account 1	U	\$925.00	\$21.20	SGAAX	B	7/24/2018		\$18,500.00	0.0575	\$ 1,063.75	\$ 185.00	\$38,000.00
367	Customer 28	Account 1	U	\$760.00	\$21.24	SGAAX	B	7/25/2018		\$19,000.00	0.0476	\$ 904.40	\$ -	\$57,000.00
368	Customer 28	Account 1	S	\$1,086.25	\$22.84	SSIZX	B	7/29/2019		\$19,750.00	0.0574	\$ 1,133.65	\$ -	\$19,750.00
369	Customer 28	Account 1	U	\$1,086.25	\$22.78	SSIZX	B	7/30/2019		\$19,750.00	0.0575	\$ 1,135.63	\$ -	\$39,500.00
370	Customer 29	Account 1	S	\$912.50	\$18.85	FDSAX	B	3/6/2017		\$18,250.00	0.0573	\$ 1,045.73	\$ -	\$18,250.00
371	Customer 29	Account 1	U	\$700.00	\$18.81	FDSAX	B	3/13/2017		\$14,000.00	0.0574	\$ 803.60	\$ -	\$32,250.00
372	Customer 29	Account 1	S	\$625.00	\$25.56	MSFBX	B	12/19/2017		\$12,500.00	0.0524	\$ 655.00	\$ 61.25	\$12,500.00
373	Customer 29	Account 1	U	\$607.50	\$25.23	MSFBX	B	12/20/2017		\$13,500.00	0.0476	\$ 642.60	\$ -	\$26,000.00
374	Customer 29	Account 1	S	\$992.50	\$14.73	PRUAX	B	2/11/2019		\$19,850.00	0.055	\$ 1,091.75	\$ 99.25	\$19,850.00
375	Customer 29	Account 1	U	\$258.75	\$14.69	PRUAX	B	2/12/2019		\$5,750.00	0.0497	\$ 285.78	\$ -	\$25,600.00

Dept. of Enforcement v. D. Allen Blankenship  
Disc. Proceeding No. 2019064333401  
Exhibit B

Item #	Customer No.	Account No.	Solicited /Unsolicited	GDC	Price	Fund	Buy/Sell Code	Trade Date	ENF Days Sold	Amount Invested	Sales Charge %	Sales Charge	Overcharge*	Total Amount Invested
376	Customer 30	Account 1	S	\$750.00	\$14.19	AGREX	B	7/11/2018		\$15,000.00	0.055	\$ 825.00	\$ -	\$15,000.00
377	Customer 30	Account 1	U	\$500.00	\$14.24	AGREX	B	7/13/2018		\$10,000.00	0.0548	\$ 548.00	\$ -	\$25,000.00
378	Customer 30	Account 1	U	\$750.00	\$14.19	AGREX	B	7/16/2018		\$15,000.00	0.055	\$ 825.00	\$ -	\$40,000.00
379	Customer 30	Account 1	S	\$190.00	\$14.12	AGREX	B	7/17/2018		\$3,800.00	0.0552	\$ 209.76	\$ -	\$43,800.00
380	Customer 30	Account 1	S	\$875.00	\$24.31	AMECX	B	7/11/2018		\$17,500.00	0.0576	\$ 1,008.00	\$ 133.00	\$17,500.00
381	Customer 30	Account 1	U	\$425.00	\$24.27	AMECX	B	7/13/2018		\$10,000.00	0.0499	\$ 499.00	\$ -	\$27,500.00
382	Customer 30	Account 1	S	\$425.00	\$24.23	AMECX	B	7/16/2018		\$10,000.00	0.0499	\$ 499.00	\$ -	\$37,500.00
383	Customer 30	Account 1	S	\$950.00	\$19.36	FDSAX	B	7/10/2018		\$19,000.00	0.0573	\$ 1,088.70	\$ 186.20	\$19,000.00
384	Customer 30	Account 1	U	\$975.00	\$19.14	FDSAX	B	7/11/2018		\$19,500.00	0.0575	\$ 1,121.25	\$ 195.00	\$38,500.00
385	Customer 30	Account 1	U	\$600.00	\$19.00	FDSAX	B	7/13/2018		\$15,000.00	0.0474	\$ 711.00	\$ -	\$53,500.00
386	Customer 30	Account 1	U	\$780.00	\$18.98	FDSAX	B	7/17/2018		\$19,500.00	0.0474	\$ 924.30	\$ -	\$73,000.00
387	Customer 30	Account 1	S	\$760.00	\$19.35	FKUTX	B	7/10/2018		\$19,000.00	0.0424	\$ 805.60	\$ 45.60	\$19,000.00
388	Customer 30	Account 1	U	\$740.00	\$19.50	FKUTX	B	7/11/2018		\$18,500.00	0.0426	\$ 788.10	\$ 48.10	\$37,500.00
389	Customer 30	Account 1	U	\$760.00	\$19.51	FKUTX	B	7/13/2018		\$19,000.00	0.0425	\$ 807.50	\$ 47.50	\$56,500.00
390	Customer 30	Account 1	U	\$640.00	\$19.47	FKUTX	B	7/16/2018		\$16,000.00	0.0426	\$ 681.60	\$ 41.60	\$72,500.00
391	Customer 30	Account 1	S	\$780.00	\$19.45	FKUTX	B	7/17/2018		\$19,500.00	0.0427	\$ 832.65	\$ 52.65	\$92,000.00
392	Customer 30	Account 1	S	\$975.00	\$7.82	HFQAX	B	7/10/2018		\$19,500.00	0.0575	\$ 1,121.25	\$ 243.75	\$19,500.00
393	Customer 30	Account 1	U	\$950.00	\$7.71	HFQAX	B	7/11/2018		\$19,000.00	0.0571	\$ 1,084.90	\$ 229.90	\$38,500.00
394	Customer 30	Account 1	U	\$656.25	\$7.65	HFQAX	B	7/13/2018		\$17,500.00	0.0444	\$ 777.00	\$ -	\$56,000.00
395	Customer 30	Account 1	S	\$731.25	\$7.63	HFQAX	B	7/16/2018		\$19,500.00	0.0446	\$ 869.70	\$ -	\$75,500.00
396	Customer 30	Account 1	S	\$731.25	\$7.62	HFQAX	B	7/17/2018		\$19,500.00	0.0446	\$ 869.70	\$ -	\$95,000.00
397	Customer 30	Account 1	S	\$950.00	\$37.34	JVIAX	B	7/11/2018		\$19,000.00	0.0576	\$ 1,094.40	\$ 191.90	\$19,000.00
398	Customer 30	Account 1	U	\$637.50	\$37.52	JVIAX	B	7/13/2018		\$15,000.00	0.0474	\$ 711.00	\$ -	\$34,000.00
399	Customer 30	Account 1	S	\$637.50	\$37.44	JVIAX	B	7/16/2018		\$15,000.00	0.0475	\$ 712.50	\$ -	\$49,000.00
400	Customer 30	Account 1	S	\$750.00	\$47.85	LGGAX	B	7/10/2018		\$15,000.00	0.0575	\$ 862.50	\$ 112.50	\$15,000.00
401	Customer 30	Account 1	U	\$500.00	\$47.94	LGGAX	B	7/13/2018		\$10,000.00	0.0576	\$ 576.00	\$ 76.00	\$25,000.00
402	Customer 30	Account 1	U	\$531.25	\$47.53	LGGAX	B	7/16/2018		\$12,500.00	0.0501	\$ 626.25	\$ -	\$37,500.00
403	Customer 30	Account 1	S	\$950.00	\$26.64	MSFBX	B	7/10/2018		\$19,000.00	0.0526	\$ 999.40	\$ 239.40	\$19,000.00
404	Customer 30	Account 1	U	\$855.00	\$26.31	MSFBX	B	7/11/2018		\$19,000.00	0.0475	\$ 902.50	\$ 142.50	\$38,000.00
405	Customer 30	Account 1	U	\$562.50	\$26.38	MSFBX	B	7/13/2018		\$15,000.00	0.0402	\$ 603.00	\$ -	\$53,000.00
406	Customer 30	Account 1	S	\$562.50	\$26.25	MSFBX	B	7/16/2018		\$15,000.00	0.04	\$ 600.00	\$ -	\$68,000.00
407	Customer 30	Account 1	S	\$950.00	\$21.14	SGAAX	B	7/10/2018		\$19,000.00	0.0577	\$ 1,096.30	\$ -	\$19,000.00
408	Customer 30	Account 1	U	\$950.00	\$21.01	SGAAX	B	7/11/2018		\$19,000.00	0.0576	\$ 1,094.40	\$ -	\$38,000.00
409	Customer 30	Account 1	U	\$500.00	\$21.32	SGAAX	B	7/13/2018		\$10,000.00	0.0577	\$ 577.00	\$ -	\$48,000.00
410	Customer 30	Account 1	S	\$787.50	\$16.24	SGGDY	B	7/11/2018		\$17,500.00	0.0499	\$ 873.25	\$ 85.75	\$17,500.00
411	Customer 30	Account 1	U	\$425.00	\$16.09	SGGDY	B	7/13/2018		\$10,000.00	0.0447	\$ 447.00	\$ -	\$27,500.00
412	Customer 30	Account 1	U	\$425.00	\$16.04	SGGDY	B	7/16/2018		\$10,000.00	0.0449	\$ 449.00	\$ -	\$37,500.00
413	Customer 30	Account 1	S	\$1,072.50	\$22.76	SSIZX	B	7/10/2019		\$19,500.00	0.0576	\$ 1,123.20	\$ 196.95	\$19,500.00
414	Customer 30	Account 1	U	\$1,045.00	\$22.75	SSIZX	B	7/11/2019		\$19,000.00	0.0576	\$ 1,094.40	\$ 191.90	\$38,500.00
415	Customer 30	Account 1	S	\$517.50	\$22.54	SSIZX	B	7/15/2019		\$11,500.00	0.0475	\$ 546.25	\$ -	\$50,000.00
416	Customer 31	Account 1	S	\$987.50	\$26.10	MSFBX	B	3/8/2019		\$19,750.00	0.0525	\$ 1,036.88	\$ 98.75	\$19,750.00
417	Customer 31	Account 1	U	\$553.50	\$26.64	MSFBX	B	3/14/2019		\$12,300.00	0.0477	\$ 586.71	\$ -	\$32,050.00
418	Customer 31	Account 1	S	\$877.50	\$15.01	PRUAX	B	3/8/2019		\$19,500.00	0.05	\$ 975.00	\$ 97.50	\$19,500.00
419	Customer 31	Account 1	U	\$780.00	\$15.07	PRUAX	B	3/11/2019		\$19,500.00	0.0451	\$ 879.45	\$ -	\$39,000.00
420	Customer 32	Account 1	S	\$750.00	\$18.20	FDSAX	B	1/5/2017		\$15,000.00	0.0577	\$ 865.50	\$ -	\$15,000.00
421	Customer 32	Account 1	S	\$900.00	\$18.18	FDSAX	B	1/6/2017		\$18,000.00	0.0578	\$ 1,040.40	\$ -	\$33,000.00
422	Customer 32**	Account 1	U	\$1,050.00	\$36.14	HFEAX	B	2/26/2018		\$21,000.00	0.0576	\$ 1,209.60	\$ 264.60	\$21,000.00
423	Customer 32	Account 1	U	\$521.25	\$35.27	HFEAX	B	2/27/2018		\$13,900.00	0.0451	\$ 626.89	\$ -	\$34,900.00
424	Customer 32	Account 1	U	\$975.00	\$7.63	HFQAX	B	9/11/2018		\$19,500.00	0.0577	\$ 1,125.15	\$ 247.65	\$19,500.00
425	Customer 32	Account 1	S	\$262.50	\$7.55	HFQAX	B	9/12/2018		\$7,000.00	0.045	\$ 315.00	\$ -	\$26,500.00
426	Customer 32	Account 1	S	\$750.00	\$19.49	MMUFX	B	1/6/2017		\$15,000.00	0.0575	\$ 862.50	\$ -	\$15,000.00
427	Customer 32	Account 1	S	\$945.00	\$19.36	MMUFX	B	1/9/2017		\$18,900.00	0.0573	\$ 1,082.97	\$ -	\$33,900.00
428	Customer 32	Account 1	S	\$600.00	\$61.11	RYPDX	B	1/5/2017		\$15,000.00	0.0475	\$ 712.50	\$ -	\$15,000.00
429	Customer 32	Account 1	S	\$752.00	\$61.03	RYPDX	B	1/6/2017		\$18,800.00	0.0475	\$ 893.00	\$ -	\$33,800.00
430	Customer 32	Account 1	S	\$476.00	\$60.62	RYPDX	B	1/9/2017		\$11,900.00	0.0475	\$ 565.25	\$ -	\$45,700.00

Dept. of Enforcement v. D. Allen Blankenship  
Disc. Proceeding No. 2019064333401  
Exhibit B

Item #	Customer No.	Account No.	Solicited /Unsolicited	GDC	Price	Fund	Buy/Sell Code	Trade Date	ENF Days Sold	Amount Invested	Sales Charge %	Sales Charge	Overcharge*	Total Amount Invested
431	Customer 32	Account 1	S	\$950.00	\$65.53	SHSAX	B	9/10/2018		\$19,000.00	0.0525	\$ 997.50	\$ 95.00	\$19,000.00
432	Customer 32	Account 1	U	\$315.00	\$65.26	SHSAX	B	9/11/2018		\$7,000.00	0.0475	\$ 332.50	\$ -	\$26,000.00
433	Customer 32	Account 2	S	\$975.00	\$38.18	EKWAX	B	1/8/2018		\$19,500.00	0.0576	\$ 1,123.20	\$ -	\$19,500.00
434	Customer 32	Account 2	U	\$875.00	\$37.55	EKWAX	B	1/9/2018		\$17,500.00	0.0575	\$ 1,006.25	\$ -	\$37,000.00
435	Customer 32	Account 2	S	\$975.00	\$7.63	HFQAX	B	9/11/2018		\$19,500.00	0.0577	\$ 1,125.15	\$ 247.65	\$19,500.00
436	Customer 32	Account 2	U	\$322.50	\$7.55	HFQAX	B	9/12/2018		\$8,600.00	0.045	\$ 387.00	\$ -	\$28,100.00
437	Customer 32	Account 2	S	\$935.00	\$24.99	IBNAX	B	6/6/2019		\$18,700.00	0.0576	\$ 1,077.12	\$ -	\$18,700.00
438	Customer 32	Account 2	U	\$637.50	\$25.18	IBNAX	B	6/7/2019		\$12,750.00	0.0576	\$ 734.40	\$ -	\$31,450.00
439	Customer 32	Account 2	S	\$760.00	\$34.20	JVAAX	B	1/6/2017		\$16,000.00	0.0526	\$ 841.60	\$ -	\$16,000.00
440	Customer 32	Account 2	U	\$855.00	\$33.94	JVAAX	B	1/9/2017		\$18,000.00	0.0524	\$ 943.20	\$ -	\$34,000.00
441	Customer 32	Account 2	S	\$800.00	\$21.39	MSFBX	B	1/6/2017		\$16,000.00	0.0524	\$ 838.40	\$ 198.40	\$16,000.00
442	Customer 32	Account 2	S	\$810.00	\$21.28	MSFBX	B	1/9/2017		\$18,000.00	0.0475	\$ 855.00	\$ 135.00	\$34,000.00
443	Customer 32	Account 2	S	\$975.00	\$15.94	PRUAX	B	6/6/2019		\$19,500.00	0.0552	\$ 1,076.40	\$ 101.40	\$19,500.00
444	Customer 32	Account 2	U	\$573.75	\$15.81	PRUAX	B	6/7/2019		\$12,750.00	0.05	\$ 637.50	\$ -	\$32,250.00
445	Customer 32	Account 2	S	\$750.00	\$19.90	SGAAX	B	3/1/2018		\$15,000.00	0.0573	\$ 859.50	\$ -	\$15,000.00
446	Customer 32	Account 2	U	\$775.00	\$20.02	SGAAX	B	3/2/2018		\$15,500.00	0.0574	\$ 889.70	\$ -	\$30,500.00
447	Customer 32	Account 2	U	\$875.00	\$20.20	SGAAX	B	3/5/2018		\$17,500.00	0.0574	\$ 1,004.50	\$ -	\$48,000.00
448	Customer 32	Account 3	S	\$900.00	\$28.84	JVIAX	B	1/6/2017		\$18,000.00	0.0576	\$ 1,036.80	\$ -	\$18,000.00
449	Customer 32	Account 3	S	\$917.50	\$28.92	JVIAX	B	1/9/2017		\$18,350.00	0.0574	\$ 1,053.29	\$ -	\$36,350.00
450	Customer 32	Account 3	U	\$839.38	\$14.79	SGGDX	B	12/24/2018		\$19,750.00	0.0453	\$ 894.68	\$ 104.68	\$19,750.00
451	Customer 32	Account 3	U	\$674.81	\$14.65	SGGDX	B	12/26/2018		\$17,995.00	0.0403	\$ 725.20	\$ -	\$37,745.00
452	Customer 33	Account 1	S	\$875.00	\$39.07	EKWAX	B	1/17/2017		\$17,500.00	0.0576	\$ 1,008.00	\$ -	\$17,500.00
453	Customer 33	Account 1	U	\$875.00	\$38.56	EKWAX	B	1/18/2017		\$17,500.00	0.0576	\$ 1,008.00	\$ -	\$35,000.00
454	Customer 33	Account 1	S	\$875.00	\$18.14	FDSAX	B	1/17/2017		\$17,500.00	0.0573	\$ 1,002.75	\$ -	\$17,500.00
455	Customer 33	Account 1	S	\$900.00	\$18.18	FDSAX	B	1/18/2017		\$18,000.00	0.0578	\$ 1,040.40	\$ -	\$35,500.00
456	Customer 33	Account 1	U	\$500.00	\$18.13	FDSAX	B	1/19/2017		\$10,000.00	0.0574	\$ 574.00	\$ -	\$45,500.00
457	Customer 33	Account 1	S	\$875.00	\$19.71	MMUFX	B	1/17/2017		\$17,500.00	0.0573	\$ 1,002.75	\$ -	\$17,500.00
458	Customer 33	Account 1	S	\$875.00	\$19.63	MMUFX	B	1/18/2017		\$17,500.00	0.0576	\$ 1,008.00	\$ -	\$35,000.00
459	Customer 33	Account 1	U	\$500.00	\$19.52	MMUFX	B	1/19/2017		\$10,000.00	0.0574	\$ 574.00	\$ -	\$45,000.00
460	Customer 33	Account 1	S	\$900.00	\$14.29	RRIAX	B	1/29/2018		\$18,000.00	0.0574	\$ 1,033.20	\$ -	\$18,000.00
461	Customer 33	Account 1	U	\$675.00	\$14.19	RRIAX	B	1/30/2018		\$13,500.00	0.0578	\$ 780.30	\$ -	\$31,500.00
462	Customer 34	Account 1	S	\$990.00	\$26.02	IBNAX	B	7/18/2019		\$19,800.00	0.0577	\$ 1,142.46	\$ -	\$19,800.00
463	Customer 34	Account 1	U	\$500.00	\$26.01	IBNAX	B	7/19/2019		\$10,000.00	0.0577	\$ 577.00	\$ -	\$29,800.00
464	Customer 34	Account 1	S	\$950.00	\$37.66	JVIAX	B	6/4/2018		\$19,000.00	0.0576	\$ 1,094.40	\$ -	\$19,000.00
465	Customer 34	Account 1	U	\$881.43	\$37.69	JVIAX	B	6/5/2018		\$17,628.62	0.0576	\$ 1,015.41	\$ -	\$36,628.62
466	Customer 34	Account 1	S	\$740.00	\$45.51	MGIAX	B	12/4/2017		\$18,500.00	0.0475	\$ 878.75	\$ -	\$18,500.00
467	Customer 34	Account 1	U	\$760.00	\$45.59	MGIAX	B	12/5/2017		\$19,000.00	0.0476	\$ 904.40	\$ -	\$37,500.00
468	Customer 34	Account 1	U	\$280.00	\$45.56	MGIAX	B	12/6/2017		\$7,000.00	0.0474	\$ 331.80	\$ -	\$44,500.00
469	Customer 34	Account 1	S	\$950.00	\$21.75	MMUFX	B	8/25/2017		\$19,000.00	0.0575	\$ 1,092.50	\$ -	\$19,000.00
470	Customer 34	Account 1	U	\$950.00	\$21.75	MMUFX	B	8/28/2017		\$19,000.00	0.0575	\$ 1,092.50	\$ -	\$38,000.00
471	Customer 34	Account 2	U	\$500.00	\$38.90	EKWAX	B	8/25/2017		\$10,000.00	0.0576	\$ 576.00	\$ -	\$10,000.00
472	Customer 34	Account 2	U	\$662.50	\$40.58	EKWAX	B	8/29/2017		\$13,250.00	0.0574	\$ 760.55	\$ -	\$23,250.00
473	Customer 34	Account 2	U	\$900.00	\$18.93	FDSAX	B	3/20/2017		\$18,000.00	0.0576	\$ 1,036.80	\$ -	\$18,000.00
474	Customer 34	Account 2	U	\$588.00	\$18.51	FDSAX	B	3/21/2017		\$14,700.00	0.0475	\$ 698.25	\$ -	\$32,700.00
475	Customer 34	Account 2	S	\$975.00	\$6.60	HFQAX	B	1/3/2019		\$19,500.00	0.0576	\$ 1,123.20	\$ -	\$19,500.00
476	Customer 34	Account 2	U	\$795.00	\$6.76	HFQAX	B	1/4/2019		\$15,900.00	0.0577	\$ 917.43	\$ -	\$35,400.00
477	Customer 34	Account 2	S	\$925.00	\$22.63	PGCOX	B	6/26/2017		\$18,500.00	0.0574	\$ 1,061.90	\$ -	\$18,500.00
478	Customer 34	Account 2	U	\$925.00	\$22.51	PGCOX	B	6/27/2017		\$18,500.00	0.0573	\$ 1,060.05	\$ -	\$37,000.00
479	Customer 34	Account 2	U	\$212.50	\$22.63	PGCOX	B	6/28/2017		\$4,250.00	0.0574	\$ 243.95	\$ -	\$41,250.00
480	Customer 35	Account 1	S	\$875.00	\$21.57	IAUTX	B	12/28/2018		\$17,500.00	0.0552	\$ 966.00	\$ -	\$17,500.00
481	Customer 35	Account 1	S	\$335.00	\$21.69	IAUTX	B	12/31/2018		\$6,700.00	0.0549	\$ 367.83	\$ -	\$24,200.00
482	Customer 35	Account 1	S	\$995.00	\$24.65	IBNAX	B	5/29/2019		\$19,900.00	0.0576	\$ 1,146.24	\$ -	\$19,900.00
483	Customer 35	Account 1	U	\$995.00	\$24.66	IBNAX	B	5/30/2019		\$19,900.00	0.0576	\$ 1,146.24	\$ -	\$39,800.00
484	Customer 35	Account 1	U	\$500.00	\$24.51	IBNAX	B	5/31/2019		\$10,000.00	0.0575	\$ 575.00	\$ -	\$49,800.00



Dept. of Enforcement v. D. Allen Blankenship  
Disc. Proceeding No. 2019064333401  
Exhibit B

Item #	Customer No.	Account No.	Solicited /Unsolicited	GDC	Price	Fund	Buy/Sell Code	Trade Date	ENF Days Sold	Amount Invested	Sales Charge %	Sales Charge	Overcharge*	Total Amount Invested
485	Customer 35**	Account 1	S	\$987.50	\$34.45	JVIAX	B	11/5/2018		\$19,750.00	0.0575	\$ 1,135.63	\$ 197.50	\$19,750.00
486	Customer 35**	Account 1	S	\$987.50	\$34.46	JVIAX	B	11/6/2018		\$19,750.00	0.0575	\$ 1,135.63	\$ 197.50	\$39,500.00
487	Customer 35	Account 1	S	\$828.75	\$34.70	JVIAX	B	11/7/2018		\$19,500.00	0.0475	\$ 926.25	\$ -	\$59,000.00
488	Customer 35	Account 1	U	\$680.00	\$34.31	JVIAX	B	11/8/2018		\$16,000.00	0.0475	\$ 760.00	\$ -	\$75,000.00
489	Customer 35	Account 1	S	\$975.00	\$22.10	PGCOX	B	5/23/2017		\$19,500.00	0.0575	\$ 1,121.25	\$ -	\$19,500.00
490	Customer 35	Account 1	U	\$900.00	\$22.27	PGCOX	B	5/24/2017		\$18,000.00	0.0575	\$ 1,035.00	\$ -	\$37,500.00
491	Customer 35	Account 1	U	\$400.00	\$22.39	PGCOX	B	5/25/2017		\$8,000.00	0.0576	\$ 460.80	\$ -	\$45,500.00
492	Customer 36	Account 1	S	\$900.00	\$18.43	FDSAX	B	1/3/2017		\$18,000.00	0.0575	\$ 1,035.00	\$ -	\$18,000.00
493	Customer 36	Account 1	U	\$565.00	\$18.51	FDSAX	B	1/4/2017		\$11,300.00	0.0573	\$ 647.49	\$ -	\$29,300.00
494	Customer 36	Account 1	U	\$750.00	\$20.45	FDSAX	B	10/24/2017		\$15,000.00	0.0577	\$ 865.50	\$ 153.00	\$44,300.00
495	Customer 36	Account 1	U	\$360.00	\$20.04	FDSAX	B	10/25/2017		\$9,000.00	0.0474	\$ 426.60	\$ -	\$53,300.00
496	Customer 36	Account 1	S	\$975.00	\$7.31	HFQAX	B	11/5/2018		\$19,500.00	0.0575	\$ 1,121.25	\$ 243.75	\$19,500.00
497	Customer 36	Account 1	S	\$618.75	\$7.20	HFQAX	B	11/6/2018		\$16,500.00	0.0444	\$ 732.60	\$ -	\$36,000.00
498	Customer 36	Account 1	U	\$731.25	\$7.31	HFQAX	B	11/7/2018		\$19,500.00	0.0451	\$ 879.45	\$ -	\$55,500.00
499	Customer 36	Account 1	U	\$637.50	\$7.28	HFQAX	B	11/8/2018		\$17,000.00	0.0453	\$ 770.10	\$ -	\$72,500.00
500	Customer 36	Account 1	S	\$950.00	\$13.74	PRUAX	B	12/28/2018		\$19,000.00	0.0553	\$ 1,050.70	\$ 100.70	\$19,000.00
501	Customer 36	Account 1	U	\$855.00	\$13.76	PRUAX	B	12/31/2018		\$19,000.00	0.0501	\$ 951.90	\$ -	\$38,000.00
502	Customer 36	Account 1	U	\$740.00	\$58.96	RYPDX	B	12/6/2016		\$18,500.00	0.0475	\$ 878.75	\$ -	\$18,500.00
503	Customer 36	Account 1	U	\$740.00	\$59.79	RYPDX	B	12/7/2016		\$18,500.00	0.0475	\$ 878.75	\$ -	\$37,000.00
504	Customer 37	Account 1	S	\$875.00	\$40.59	GHAAX	B	1/31/2017		\$17,500.00	0.0574	\$ 1,004.50	\$ 129.50	\$17,500.00
505	Customer 37	Account 1	U	\$743.75	\$40.36	GHAAX	B	2/1/2017		\$17,500.00	0.05	\$ 875.00	\$ -	\$35,000.00
506	Customer 37	Account 1	U	\$510.00	\$40.48	GHAAX	B	2/3/2017		\$12,000.00	0.0499	\$ 598.80	\$ -	\$47,000.00
507	Customer 37	Account 1	S	\$975.00	\$7.75	HFQAX	B	7/5/2018		\$19,500.00	0.0581	\$ 1,132.95	\$ 255.45	\$19,500.00
508	Customer 37	Account 1	U	\$950.00	\$7.79	HFQAX	B	7/6/2018		\$19,000.00	0.0578	\$ 1,098.20	\$ 243.20	\$38,500.00
509	Customer 37	Account 1	U	\$137.50	\$7.81	HFQAX	B	7/9/2018		\$2,750.00	0.0576	\$ 158.40	\$ 34.65	\$41,250.00
510	Customer 37	Account 1	U	\$487.50	\$7.63	HFQAX	B	7/16/2018		\$13,000.00	0.0446	\$ 579.80	\$ -	\$54,250.00
511	Customer 37	Account 1	S	\$975.00	\$25.82	IBNAX	B	7/8/2019		\$19,500.00	0.0573	\$ 1,117.35	\$ -	\$19,500.00
512	Customer 37	Account 1	U	\$675.00	\$25.84	IBNAX	B	7/9/2019		\$13,500.00	0.0577	\$ 778.95	\$ -	\$33,000.00
513	Customer 37	Account 1	S	\$750.00	\$36.89	JVIAX	B	4/19/2018		\$15,000.00	0.0575	\$ 862.50	\$ -	\$15,000.00
514	Customer 37	Account 1	U	\$400.00	\$36.58	JVIAX	B	4/20/2018		\$8,000.00	0.0574	\$ 459.20	\$ -	\$23,000.00
515	Customer 38	Account 1	S	\$712.50	\$19.07	FDSAX	B	5/2/2017		\$14,250.00	0.0577	\$ 822.23	\$ -	\$14,250.00
516	Customer 38	Account 1	U	\$875.00	\$19.03	FDSAX	B	5/3/2017		\$17,500.00	0.0573	\$ 1,002.75	\$ -	\$31,750.00
517	Customer 38	Account 1	U	\$675.00	\$18.90	FDSAX	B	5/4/2017		\$13,500.00	0.0577	\$ 778.95	\$ -	\$45,250.00
518	Customer 38	Account 1	S	\$782.00	\$19.23	FKUTX	B	1/16/2019		\$19,550.00	0.0426	\$ 832.83	\$ 50.83	\$19,550.00
519	Customer 38	Account 1	U	\$494.00	\$19.32	FKUTX	B	1/17/2019		\$12,350.00	0.0424	\$ 523.64	\$ 29.64	\$31,900.00
520	Customer 38	Account 1	U	\$850.00	\$33.59	JVIAX	B	5/2/2017		\$17,000.00	0.0575	\$ 977.50	\$ -	\$17,000.00
521	Customer 38	Account 1	U	\$650.00	\$33.43	JVIAX	B	5/3/2017		\$13,000.00	0.0574	\$ 746.20	\$ -	\$30,000.00
522	Customer 38	Account 1	S	\$888.75	\$16.96	SGGDY	B	5/14/2018		\$19,750.00	0.0501	\$ 989.48	\$ 100.73	\$19,750.00
523	Customer 38	Account 1	U	\$85.50	\$16.62	SGGDY	B	5/15/2018		\$1,900.00	0.0499	\$ 94.81	\$ -	\$21,650.00
524	Customer 38	Account 2	S	\$950.00	\$20.32	MMUFX	B	5/9/2017		\$19,000.00	0.0576	\$ 1,094.40	\$ -	\$19,000.00
525	Customer 38	Account 2	U	\$925.00	\$20.50	MMUFX	B	5/10/2017		\$18,500.00	0.0576	\$ 1,065.60	\$ -	\$37,500.00
526	Customer 38	Account 2	S	\$950.00	\$24.04	MSFBX	B	5/9/2017		\$19,000.00	0.0524	\$ 995.60	\$ -	\$19,000.00
527	Customer 38	Account 2	U	\$185.00	\$24.05	MSFBX	B	5/10/2017		\$3,700.00	0.0524	\$ 193.88	\$ -	\$22,700.00
528	Customer 38	Account 2	S	\$1,089.00	\$22.88	SSIZX	B	8/8/2019		\$19,800.00	0.0577	\$ 1,142.46	\$ -	\$19,800.00
529	Customer 38	Account 2	U	\$1,089.00	\$22.84	SSIZX	B	8/12/2019		\$19,800.00	0.0574	\$ 1,136.52	\$ -	\$39,600.00
530	Customer 38	Account 2	U	\$332.75	\$22.84	SSIZX	B	8/12/2019		\$6,050.00	0.0574	\$ 347.27	\$ -	\$45,650.00
531	Customer 39	Account 1	S	\$500.00	\$19.28	FDSAX	B	6/13/2017		\$10,000.00	0.0576	\$ 576.00	\$ -	\$10,000.00
532	Customer 39	Account 1	U	\$525.00	\$19.23	FDSAX	B	6/14/2017		\$10,500.00	0.0577	\$ 605.85	\$ -	\$20,500.00
533	Customer 39	Account 1	S	\$987.50	\$25.44	IBNAX	B	8/6/2019		\$19,750.00	0.0574	\$ 1,133.65	\$ -	\$19,750.00
534	Customer 39	Account 1	U	\$987.50	\$25.39	IBNAX	B	8/7/2019		\$19,750.00	0.0575	\$ 1,135.63	\$ -	\$39,500.00
535	Customer 39	Account 1	U	\$75.00	\$25.73	IBNAX	B	8/8/2019		\$1,500.00	0.0575	\$ 86.25	\$ -	\$41,000.00
536	Customer 39	Account 1	S	\$750.00	\$36.55	JVIAX	B	4/3/2018		\$15,000.00	0.0575	\$ 862.50	\$ -	\$15,000.00
537	Customer 39	Account 1	U	\$900.00	\$36.68	JVIAX	B	4/4/2018		\$18,000.00	0.0575	\$ 1,035.00	\$ -	\$33,000.00
538	Customer 39	Account 1	U	\$450.00	\$36.90	JVIAX	B	4/5/2018		\$9,000.00	0.0575	\$ 517.50	\$ -	\$42,000.00

Dept. of Enforcement v. D. Allen Blankenship  
Disc. Proceeding No. 2019064333401  
Exhibit B

Item #	Customer No.	Account No.	Solicited /Unsolicited	GDC	Price	Fund	Buy/Sell Code	Trade Date	ENF Days Sold	Amount Invested	Sales Charge %	Sales Charge	Overcharge*	Total Amount Invested
539	Customer 39	Account 1	S	\$925.00	\$25.59	MSFBX	B	1/3/2018		\$18,500.00	0.0524	\$ 969.40	\$ 90.65	\$18,500.00
540	Customer 39	Account 1	U	\$828.00	\$25.59	MSFBX	B	1/4/2018		\$18,400.00	0.0477	\$ 877.68	\$ -	\$36,900.00
541	Customer 39	Account 1	S	\$950.00	\$14.55	PRUAX	B	2/6/2019		\$19,000.00	0.055	\$ 1,045.00	\$ 95.00	\$19,000.00
542	Customer 39	Account 1	S	\$855.00	\$14.59	PRUAX	B	2/7/2019		\$19,000.00	0.05	\$ 950.00	\$ -	\$38,000.00
543	Customer 39	Account 1	U	\$461.25	\$14.64	PRUAX	B	2/8/2019		\$10,250.00	0.0499	\$ 511.48	\$ -	\$48,250.00
544	Customer 39	Account 1	U	\$400.00	\$62.15	RYPDX	B	11/7/2016		\$10,000.00	0.0475	\$ 475.00	\$ -	\$10,000.00
545	Customer 39	Account 1	U	\$600.00	\$62.85	RYPDX	B	11/8/2016		\$15,000.00	0.0476	\$ 714.00	\$ -	\$25,000.00
546	Customer 39	Account 1	U	\$640.00	\$61.78	RYPDX	B	11/9/2016		\$16,000.00	0.0474	\$ 758.40	\$ -	\$41,000.00
547	Customer 39	Account 1	U	\$400.00	\$59.75	RYPDX	B	11/10/2016		\$10,000.00	0.0475	\$ 475.00	\$ -	\$51,000.00
548	Customer 40	Account 1	S	\$975.00	\$33.91	JVIAX	B	11/23/2018		\$19,500.00	0.0575	\$ 1,121.25	\$ 195.00	\$19,500.00
549	Customer 40	Account 1	U	\$828.75	\$33.77	JVIAX	B	11/26/2018		\$19,500.00	0.0474	\$ 924.30	\$ -	\$39,000.00
550	Customer 40	Account 1	U	\$828.75	\$33.76	JVIAX	B	11/27/2018		\$19,500.00	0.0474	\$ 924.30	\$ -	\$58,500.00
551	Customer 40	Account 1	U	\$552.50	\$34.34	JVIAX	B	11/28/2018		\$13,000.00	0.0474	\$ 616.20	\$ -	\$71,500.00
552	Customer 40	Account 2	S	\$1,031.63	\$37.05	DAMDX	B	9/20/2018		\$19,650.00	0.0574	\$ 1,127.91	\$ -	\$19,650.00
553	Customer 40	Account 2	U	\$1,023.75	\$36.98	DAMDX	B	9/21/2018		\$19,500.00	0.0576	\$ 1,123.20	\$ -	\$39,150.00
554	Customer 40	Account 2	U	\$525.00	\$36.87	DAMDX	B	9/24/2018		\$10,000.00	0.0575	\$ 575.00	\$ -	\$49,150.00
555	Customer 40	Account 2	S	\$750.00	\$19.54	FDSAX	B	8/6/2018		\$15,000.00	0.0573	\$ 859.50	\$ -	\$15,000.00
556	Customer 40	Account 2	U	\$900.00	\$19.59	FDSAX	B	8/7/2018		\$18,000.00	0.0577	\$ 1,038.60	\$ -	\$33,000.00
557	Customer 40	Account 2	U	\$812.50	\$19.55	FDSAX	B	8/9/2018		\$16,250.00	0.0573	\$ 931.13	\$ -	\$49,250.00
558	Customer 40	Account 2	S	\$750.00	\$7.84	HFQAX	B	8/6/2018		\$15,000.00	0.0574	\$ 861.00	\$ -	\$15,000.00
559	Customer 40	Account 2	U	\$900.00	\$7.88	HFQAX	B	8/7/2018		\$18,000.00	0.0571	\$ 1,027.80	\$ -	\$33,000.00
560	Customer 40	Account 2	U	\$812.50	\$7.87	HFQAX	B	8/9/2018		\$16,250.00	0.0572	\$ 929.50	\$ -	\$49,250.00
561	Customer 40	Account 2	S	\$995.00	\$26.18	IBNAX	B	9/12/2019		\$19,900.00	0.0577	\$ 1,148.23	\$ 103.48	\$19,900.00
562	Customer 40	Account 2	U	\$895.50	\$26.01	IBNAX	B	9/13/2019		\$19,900.00	0.0527	\$ 1,048.73	\$ -	\$39,800.00
563	Customer 40	Account 2	S	\$975.00	\$35.82	JVIAX	B	8/7/2017		\$19,500.00	0.0575	\$ 1,121.25	\$ -	\$19,500.00
564	Customer 40	Account 2	U	\$975.00	\$35.70	JVIAX	B	8/8/2017		\$19,500.00	0.0574	\$ 1,119.30	\$ -	\$39,000.00
565	Customer 40	Account 2	U	\$500.00	\$35.54	JVIAX	B	8/9/2017		\$10,000.00	0.0574	\$ 574.00	\$ -	\$49,000.00
566	Customer 40	Account 2	S	\$975.00	\$22.86	PGCOX	B	8/7/2017		\$19,500.00	0.0573	\$ 1,117.35	\$ -	\$19,500.00
567	Customer 40	Account 2	U	\$975.00	\$22.83	PGCOX	B	8/8/2017		\$19,500.00	0.0574	\$ 1,119.30	\$ -	\$39,000.00
568	Customer 40	Account 2	U	\$500.00	\$22.78	PGCOX	B	8/9/2017		\$10,000.00	0.0575	\$ 575.00	\$ -	\$49,000.00
569	Customer 40	Account 2	S	\$712.50	\$15.57	PRUAX	B	5/20/2019		\$14,250.00	0.0552	\$ 786.60	\$ 74.10	\$14,250.00
570	Customer 40	Account 2	S	\$787.50	\$15.54	PRUAX	B	5/21/2019		\$17,500.00	0.0502	\$ 878.50	\$ -	\$31,750.00
571	Customer 40	Account 2	U	\$787.50	\$15.62	PRUAX	B	5/24/2019		\$17,500.00	0.0499	\$ 873.25	\$ -	\$49,250.00
572	Customer 40	Account 2	S	\$975.00	\$14.19	RRIAX	B	1/30/2018		\$19,500.00	0.0578	\$ 1,127.10	\$ -	\$19,500.00
573	Customer 40	Account 2	S	\$975.00	\$14.25	RRIAX	B	1/31/2018		\$19,500.00	0.0575	\$ 1,121.25	\$ -	\$39,000.00
574	Customer 40	Account 2	S	\$348.00	\$58.12	RYPDX	B	12/1/2016		\$8,700.00	0.0475	\$ 413.25	\$ -	\$8,700.00
575	Customer 40	Account 2	U	\$708.80	\$58.47	RYPDX	B	12/2/2016		\$17,720.00	0.0475	\$ 841.70	\$ -	\$26,420.00
576	Customer 40	Account 2	U	\$500.00	\$58.77	RYPDX	B	12/5/2016		\$12,500.00	0.0475	\$ 593.75	\$ -	\$38,920.00
577	Customer 41	Account 1	S	\$987.50	\$48.41	AWSHX	B	4/20/2018		\$19,750.00	0.0574	\$ 1,133.65	\$ 146.15	\$19,750.00
578	Customer 41	Account 1	U	\$297.50	\$48.12	AWSHX	B	4/23/2018		\$7,000.00	0.0501	\$ 350.70	\$ -	\$26,750.00

**Totals**

**\$9,136,788.11**

**\$ 491,072.26**

**\$ 21,873.91**

\* Only overcharges greater than \$10 are included in Overcharge column