Attestation by Officer of Investment Adviser Regarding IAR Mass Registration

(Version Update 2/8/21)

I,	(the "Officer") hold the title of	
with the firm		(the "Adviser")
CRD Number		, and make the following

representations:

To the best of my knowledge

- Each individual whose first name, last name and CRD number appears on the attached spreadsheet attached as Appendix A to this affidavit, (the "Applicant List"), has authorized me to seek investment adviser representative registration ("RA") in New York on their behalf; and
- Each individual on the Applicant List is currently employed by the Adviser as an investment adviser representative as defined under 13 NYCRR 11.12(g) (as amended, effective February 1, 2021); and
- Each individual on the Applicant List maintains an updated Form U4 in compliance with FINRA rules; and

• Each individual on the Applicant List meets one or more of the following criteria:

- 1. Has a passing result for the Series 65 exam within the past two years; or
- 2. Has a passing result for the Series 66 exam within the past two years and a passing result for the Series 7 exam within the CRD continuous registration period or two years prior to the beginning of the continuous registration period; or
- 3. Has a passing result for the Series 66 exam within the past two years and a passing result or credit for the Securities Industry Essentials within the CRD continuous registration period or four years prior to the beginning of the continuous registration period and a passing result for the Series 7 Top-off exam within the CRD continuous registration period or two years prior to the beginning of the continuous registration period; or
- 4. Currently holds one of the professional designations listed in 13 NYCRR 11.7(c); or
- 5. Has been continuously registered to provide investment advice in any jurisdiction for a period of at least two (2) years prior to the date of filing registration information pursuant to section 11.4(c); has not had any lapse in registration exceeding two (2) years; and is not, and has not been, subject to any regulatory or civil action, proceeding or arbitration, either pending or in the preceding ten (10) years from the date of such application, that would require disclosure on Form U4; or
- 6. Has, in the regular course of business, acted as an investment adviser representative from a place of business in the State continuously and

permissibly for at least two (2) years prior to February 1, 2021; that person's investment advisory activities during the two (2) years preceding December 2, 2020 were not limited to serving or acting as a solicitor; and that person, for two (2) or more continuous years in the four (4) years preceding the filing of registration information, had not ceased performing acts as defined in section 11.12(f) of this Part in the regular course of business from a place of business in the State; and that person is not, and has not been, subject to any regulatory or civil action, proceeding or arbitration, either pending or in the preceding ten (10) years, from the date of such application, that would require disclosure on Form U4 and that person has not been notified or has reason to believe that they currently are or remain the subject of a regulatory or law enforcement investigation related to investment related activities; or

7. Has submitted a form NY-IAQ and been granted an exam waiver by OAG prior to February 1, 2021.

I authorize FINRA to debit the Adviser's flex funding account in the amount of \$360.00 to cover the cost of processing and reporting to New York the updates made to the individual registrations in the Applicant List.

All statements contained herein are true and correct to the best of my knowledge after a reasonable search for the information stated herein, including by communicating with the persons listed on the Applicant List and performing a search of CRD as well as internal systems. The undersigned understands, and has communicated to all persons on the Applicant List, that any false statement may void any registration granted in reliance on any such false information.

By:	Dated:

Signature of Officer

Sworn to before me this day of 20___

Notary Public