



*WESTPARK CAPITAL, INC.*  
I N V E S T M E N T B A N K I N G  
Member FINRA/SIPC

Effective May 1<sup>st</sup>, 2022

| Fee Description   | Total Fee   | Fee Basis                        |
|---|-------------|----------------------------------|
| Service Fee – (Handling & Administrative Fees) Listed and OTC Equities, Corporate, Government, and Municipal Bonds, UIT's, and Mutual Funds | \$45.50     | Per Item                         |
| Transactions in options and other executions  | Varies      | Per Item                         |
| Annual Account Fee  | \$100.00    | Per Year                         |
| Overnight Delivery (UPS)  | \$60.00     | Per Item                         |
| International Delivery (UPS)  | \$100.00    | Per Item                         |
| DWAC Charge   | \$125.00    | Per Item                         |
| DWAC Reject Charges   | As Incurred | Per Item                         |
| Client Foreign Financial Intermediary (Omnibus) Due Diligence   | \$1,000.00  | \$200/hr Over 5 hrs; Per Account |
| Safekeeping / Reconciliation / Vault Fee  | \$80.00     | Per Year (Charged Quarterly)     |
| Re-registration of Stock or Alternative Investment  | \$100.00    | Costs                            |
| Clearance or Transfer of Restricted Stock   | \$150.00    | Costs                            |
| Certificate Request DTC   | \$1,100.00  | Per Certificate                  |
| Rush Withdrawal DTC   | \$250.00    | Additional                       |
| Penny Stock Re-registration w/Agent (Domestic)  | \$3000.00   | Per Certificate                  |
| Penny stock re-registration w/Agent (Canadian)  | \$900.00    | Per Certificate                  |
| Rejected Deposits DTC or Agent  | \$285.00    | Per Certificate                  |
| Transfer Agent Charges  | As Incurred | Per Item                         |
| Long Positions (Sub Penny Book Entry)   | \$0.0000006 | Per Share, Monthly Basis         |
| Axos Clearing Assisted Dividend Posting (Asset Not Held at Axos Clearing)   | \$15.00     | Per Item                         |
| IRA Annual Custodial Fee  | \$100.00    | Per Plan                         |
| TOD Set Up Fee  | \$50        | Per Item                         |
| Transfers (Including Transfer of Roth To/From Traditional IRA)  | \$125.00    | Per Transfer                     |
| Limited Partnerships/AIP  | \$100.00    | Per Year (Charged Quarterly)     |
| Termination Fee   | \$100.00    | Per Plan                         |
| Certificate Deposit   | \$75.00     | Per Position/Per Customer        |
| Cashless Stock Options  | \$35 min    | 1% Of Proceeds Plus Costs        |
| Reg.-T Extension  | \$35.00     | Per Extension                    |
| TOD Distributions   | \$300.00    | Per Distribution                 |
| Prepayment of Unsettled Funds   | \$60.00     | Interest                         |

| Fee Description  | Total Fee | Fee Basis                     |
|--|-----------|-------------------------------|
| ACAT – Non-ACAT (Full or Partial) Transfer (Transfer Out) Plus Free Delivery Charge for Each Position. | \$150.00  | Per Account                   |
| Voluntary Tender/Exchange Offer/Bond Puts  | \$50.00   | Per Election                  |
| Bond Redemption/Conversion (Physical Only)   | \$50.00   | Plus Costs                    |
| Worthless Securities Processing Charges  | \$60.00   | Per Security Processed        |
| Mandatory Reorg Corporate Actions  | \$40.00   | Per Account                   |
| Cash Dividend Outgoing Check   | \$10.00   | Per Check                     |
| Manual Options Exercise Request  | \$40.00   | Per Request                   |
| Physical Settlements   | \$200.00  | Plus Costs                    |
| Free Deliveries DTC  | \$40.00   | Per Security                  |
| NY Window / Physical Delivery  | \$50.00   | Per Security                  |
| Trades Settled Same-Day (Cash Trades)  | \$35.00   | Per Trade                     |
| Transfer In and Out/Physical Certificate (Foreign)   | \$150.00  | Costs                         |
| Foreign Custody Fee  | Varies    | Per Security; Charged Monthly |
| Stop Payments  | \$35.00   | Per Check                     |
| Returned Checks  | \$55.00   | Per Check                     |
| Photocopies of Checks  | \$5.00    | Per Check                     |
| Returned ACH Items   | \$55.00   | Per Return                    |
| Wire, Domestic (Outgoing)  | \$45.00   | Per Wire                      |
| Wire, International (Outgoing)   | \$100.00  | Per Wire                      |
| Wire Research Requests / Service Messages  | \$50.00   | Per Request                   |
| Foreign Currency Conversions   | \$50.00   | Per Conversion                |
| Foreign Currency Transaction Postings  | \$25.00   | Per Posting                   |
| Check Writing Stop Pays  | \$40.00   | Per Stop                      |
| ACCPA Check writing and Platinum Card  | \$80.00   | Per Year                      |

#### Commission Fees

Equities and Fixed Income minimum commissions are \$65.00, negotiable, exclusive of Service fees. Options and Other Products commissions vary and may also be determined by the broker, security issuer and/or fund sponsor.

Please note, your Axos Clearing Trade Confirmation may reflect a Service Fee that includes, but is not limited to, postage, handling, ticket charges, Axos Clearing fees, overhead, trade costs, booking costs and other costs. This fee is in addition to any commission, markup, or markdown. If you have any questions regarding Service Fees, please contact your representative or WestPark Capital, Inc.'s Operations Department.

*This Fee Schedule is not inclusive of all fees - other fees may be applicable in certain situations and certain fees may be negotiated per transaction. Fees are subject to change by WestPark Capital, Inc*

*\*Please note, all calls may be recorded to ensure quality customer service.*



## INVESTOR DISCLOSURES

### PRIVACY POLICY

#### What is our commitment to you?

The following describes our Privacy Policy. Please take a moment to review it and feel free to contact us with any questions.

#### What types of non-public personal information do we collect about you?

In the course of providing service to you, we collect non-public personal information about you from the following sources:

- Information from you on account applications and other standard forms (for example, name, address, social security number, assets, types and amounts of investments, transactions, and income);
- Information about your transactions, our affiliates or others including those companies that work closely with us to provide you with diverse financial products and services (for example, your account balance, payment history, parties to transactions, types and amounts of investments, transactions, and credit card usage);
- Information we receive from consumer reporting agencies (for example, your credit worthiness and credit history);
- Information obtained when verifying the information, you provide on applications or other forms (this may be obtained from your current or past employers, or from other institutions where you conduct financial transactions).

#### How do we protect the confidentiality and security of your non-public personal information?

Keeping your information secure is one of our most important responsibilities. We restrict access to non-public personal information about you to those employees and agents who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your non-public personal information.

#### Do we disclose to any non-affiliated third parties your non-public personal information?

We do not sell, share, or disclose your non-public personal information to non-affiliated third-party marketing companies.

#### What types of non-public personal information do we disclose about you?

We may disclose all the information we collect, as described above to companies that perform marketing or other services on our behalf, or to other financial institutions with whom we have joint marketing agreements.

All these companies are contractually obligated to keep the information that we provide to them confidential and use the information only for the services required and as allowed by applicable law or regulation and are not permitted to share or use the information for any other purpose.

We may also disclose non-public personal information about you under circumstances as permitted or required by law. These disclosures typically include information to process transactions on your behalf, to conduct our operations, to follow your instructions as you authorize, or to protect the security of our financial records.

#### Do we disclose within our family of affiliated companies your nonpublic personal information?

In the course of providing services to you, we are permitted by law to share within our family of affiliated companies, information about our transactions or experiences with you (such as account balance or payment history).

#### What is our policy relating to former customers?

If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

We reserve the right to change this policy at any time and you will be notified if any changes occur.

If you have any questions after reading this Privacy Policy, please contact us in writing to WestPark Capital, Inc., Attn: Privacy Officer, 1900 Avenue of the Stars, Suite 310, Los Angeles, CA 90067.

This Privacy Policy applies to consumers who are customers or former customers of WestPark Capital, Inc. and its affiliated companies in the United States. Our affiliated companies include WestPark Capital, Inc., a SEC Registered Investment Adviser, and WestPark Insurance Services, Inc.

### BUSINESS CONTINUITY PLAN SUMMARY

WestPark Capital Inc.'s policy is to respond to a Significant Business Disruption (SBD) by safeguarding our property and the lives of our employees, by making the appropriate assessments to ensure that we can complete the following:

- Resume operations,
- Protect all of WestPark Capital's books and records,
- Allow our customers to continue to conduct business, and
- Allow customers prompt access to fund and securities.



### **Significant Business Disruptions (SBDs)**

Our plan anticipates internal and external disruptions. Internal disruptions affect only our ability to communicate and conduct business, such as a power outage or fire. External disruptions prevent the operation of the securities markets or a number of many firms, such as an earthquake, terrorist attack or widespread disruption. Our response to an external disruption relies more heavily on other organizations and systems especially including our clearing firm.

Our clearing firm is Axos Clearing, LLC, 1200 Landmark Center, Ste. 800 Omaha, NE 68102-1916. Telephone: (800) 811-3487

### **Office Locations**

Our Offices of Supervisory Jurisdiction are located in Los Angeles, California; Boca Raton, Florida; New York, New York; and Newport Beach, California.

### **Customers' Access to Funds and Securities**

The Firm does not maintain custody of customers' funds or securities. Customer funds and securities are carried by our clearing firm, Axos Clearing, LLC. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf, and if our Web access is available, we will post on our website notification so customers may access their funds and securities by contacting Axos Clearing LLC Client Services at (866) 774-0218.

### **Data Back-Up and Recovery (Hard Copy and Electronic)**

The Firm maintains its primary hard copy books and records and its electronic records at our Corporate Office in Los Angeles, California. A Designated Principal is responsible for the maintenance of these books and records. Hard copies of books and records and electronic records are also maintained at our clearing firm.

The Firm's computer server, hard copy books and records and other electronic records are backed up daily and retained off-site in a secure location. In addition, we have engaged the services of an independent technology firm that automatically backs up our records daily.

In the event of an internal or external SBD that causes the loss of our paper records, we can and will physically recover them from our back-up site. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

### **Order Taking**

Currently, the Firm receives orders from customers via telephone as well as in-person visits. During an SBD, either internal or external, we will accept transaction orders from our customers through telephone, fax, email, or through our clearing firm at (866) 774-0218. As communications permit, we will notify our customers when communications vehicles become available regarding what alternatives are available to them to transmit orders to us. Our initial method of communication to our customers will be via telephone, if available.

### **Other Services Currently Provided to Customers**

In addition to those services listed above, we also receive requests for account journals of securities, monies and stock certificates, stock certificates received and mailed out, change of address, and overall customer service. In the event of an internal SBD, we request all customers to contact Axos Clearing, LLC directly at (866) 774-0218. In the event of an external SBD, we would document all requests and forward them to our clearing firm via the best available means. If none are available, we will notify customers of the delay then forward them to our clearing firm as soon as possible.

## **INVESTOR EDUCATION AND PROTECTION**

Under the Public Disclosure Program, FINRA provides certain information regarding the disciplinary history of FINRA members and their associated persons in response to written inquiries, electronic inquiries or telephone inquiries via FINRA Regulation's toll-free telephone number (800) 289-9999. Additional information, including a brochure describing the Public Disclosure Program, may be obtained from the FINRA Regulation Website at [www.finra.org](http://www.finra.org).

## **INVESTOR COMPLAINT REGISTRATION**

Pursuant to NASD (FINRA) Rule 3010, investors may contact the Firm directly for any matter, including the filing of a complaint by contacting the office of the Chief Compliance Officer, 1900 Avenue of the Stars, Suite 310, Los Angeles, CA 90067, or via telephone at (310) 843-9300.



### **IDENTITY THEFT PREVENTION PLAN (ITPP)**

The Firm maintains an Identity Theft Prevention Plan ("ITPP") that is intended to protect our clients and their accounts from identity theft and to comply with the FTC's Red Flags Rule. The ITPP addresses identification of relevant identity theft Red Flags for our Firm, detecting those Red Flags, responding appropriately to any that are detected to prevent and mitigate identity theft, and updating our ITPP periodically to reflect changes in risks.

To identify relevant identity theft Red Flags, our Firm assessed these risk factors:

- The types of covered accounts introduced to our clearing firm,
- The methods provided to open or access these accounts, and
- Our clearing firm's previous experience with identity theft.

Our Firm also considered the sources of Red Flags, including identity theft incidents our clearing firm has experienced and how they changed identity theft techniques as they became aware of new risks, and applicable supervisory guidance of both our Firm and our clearing firm.

In addition to developing responses to Red Flags once they are identified, our Firm has also taken proactive measures to mitigate the likelihood of identity theft. Some of those proactive measures may include, but are not necessarily limited to, the following:

- Securing front-end system access,
- Physical and logical access controls,
- Secured vendor key-locked on-site shredding bins,
- Disposal of decommissioned electronic media, and
- Internal education to our staff and associated persons.

The Firm's ITPP also provides for on-going associate education and training and oversight of vendors who may receive confidential information.

The Firm's ITPP is subject to continual change as we assess the ongoing needs of our clients and changing business environment in which we operate. The Firm's ITPP is periodically reviewed by Management. Questions regarding the Firm's ITPP may be directed to our AML/ITPP Compliance Officer at WestPark Capital, Inc., 1900 Avenue of the Stars, Suite 310, Los Angeles, CA 90067 or via telephone at (310) 843-9300.

### **ANTI-MONEY LAUNDERING (AML) DISCLOSURE**

The USA PATRIOT Act, implemented in October 2002, is designed to detect, deter, and punish terrorists in the United States and abroad. The Act imposes new anti-money laundering requirements on brokerage firms and financial institutions. WestPark Capital, Inc. has implemented its AML program. To help you understand these efforts, we want to provide you with some information about money laundering and our steps to implement the USA PATRIOT Act.

#### **What is money laundering?**

Money laundering is the process of disguising illegally obtained money so that the funds appear to come from legitimate sources or activities. Money laundering occurs in connection with a wide variety of crimes, including illegal arms sales, drug trafficking, robbery, fraud, racketeering, securities fraud and terrorism.

#### **What are we required to do to eliminate money laundering?**

Under the rules required by the USA PATRIOT Act, our firm has designated an AML Compliance Officer, set up employee training, arranged for independent audits, coordinate activities with our clearing firm, Axos Clearing, LLC and established policies and procedures to detect and report suspicious transactions and ensure compliance with the laws. As part of our required program, you will be asked to provide various identification documents. Until you provide the information or documents and until your identity has been verified, you may not be able to open an account or effect any transactions through us or our clearing firm. We thank you for your cooperation and hope that you will support us in our efforts to deny terrorists groups' access to America's financial systems.

#### **SEC Order Disclosure**

The U.S. Securities and Exchange Commission's Rule 606 requires brokers that route equity and option orders to make available quarterly reports (broken out by month) that provide statistical details regarding their routing practices.

Rule 606 of Regulation NMS requires broker-dealers to disclose certain information about their order routing practices for NMS securities. A report is posted quarterly on our website.

As required under SEC Rule 606(b)(1), on request, WestPark will provide the identity of the market center to which your orders were routed for execution in the six months prior to the request, whether the orders were directed orders or non-directed orders, and the time of the executions, if any, that resulted from such orders. This applies to both held and not held orders.

#### **Annual Account Maintenance**

We annually assess an account maintenance fee which gets charged to your account during the fourth quarter of each year in the amount of \$100.