

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

Department of Enforcement,

Complainant,

v.

James Iannazzo  
CRD No. 2807988,

Respondent.

Disciplinary Proceeding  
No. 2020067734001

**COMPLAINT**

The Department of Enforcement alleges:

**SUMMARY**

1. Over the course of more than six years, while associated with FINRA member Merrill Lynch, Pierce, Fenner & Smith, Inc. (“Merrill Lynch”), James Iannazzo repeatedly structured cash deposits and withdrawals in three separate bank and brokerage accounts for the purpose of causing the financial institutions to fail to file a Currency Transaction Report (CTR).
2. Specifically, between December 2014 and March 2021 (the “Relevant Period”), Iannazzo divided cash transactions over \$10,000 into smaller deposits or withdrawals conducted over several days at the same bank, and often conducted the transactions at different branches of the same bank. Iannazzo also frequently withdrew more than \$10,000 in cash on a single day through transactions conducted at two different financial institutions.
3. In total, Iannazzo structured 71 cash deposits and withdrawals totaling \$568,440 in two personal bank accounts and 297 ATM deposits and withdrawals totaling \$277,450 in a Merrill Lynch account.

4. Iannazzo structured these cash transactions to avoid conducting a single deposit or withdrawal over \$10,000 at a financial institution, which would require the financial institution to file a CTR. Iannazzo engaged in this conduct despite receiving training on money laundering and structuring from Merrill Lynch and pamphlets describing CTRs and structuring from one of the banks.

5. By this conduct, Iannazzo violated FINRA Rule 2010.

### **RESPONDENT AND JURISDICTION**

6. Iannazzo entered the securities industry in 1995 and became registered with FINRA as a General Securities Representative through his association with Merrill Lynch in November 1996.

7. In a Uniform Termination Notice for Securities Industry Registration (Form U5) dated February 23, 2022, Merrill Lynch disclosed that it terminated Iannazzo on January 24, 2022, due to “[p]ersonal conduct outside the workplace inconsistent with Firm standards ... [that] did not involve the servicing of [Firm] accounts.”

8. Since March 16, 2022, Iannazzo has been registered with FINRA as a General Securities Representative through his association with a different FINRA member firm. Iannazzo is therefore subject to FINRA’s jurisdiction.

### **CAUSE OF ACTION Structuring Cash Transactions (FINRA Rule 2010)**

9. The Department of Enforcement realleges and incorporates by reference paragraphs 1 through 8 above.

10. FINRA Rule 2010 requires members and associated persons to “observe high standards of commercial honor and just and equitable principles of trade” in the conduct of their business.

11. The ethical standard embodied in FINRA Rule 2010 applies to any unethical business-related conduct, not just misconduct involving a security, that reflects on an associated person's ability to comply with the regulatory requirements of the securities industry.

12. 31 U.S.C. § 5313 and 31 C.F.R. § 1010.311 require financial institutions, including banks and broker-dealers, to file a CTR for each deposit, withdrawal, or exchange of currency in excess of \$10,000.

13. 31 U.S.C. § 5324(a) states that no person shall, for the purpose of evading this federal reporting requirement, (i) cause or attempt to cause a domestic financial institution to fail to file a required transaction report; (ii) cause or attempt to cause a domestic financial institution to file a required transaction report containing a material omission or misstatement; or (iii) structure or assist in structuring any transaction with one or more domestic financial institutions, or attempt to do so.

14. Similarly, 31 C.F.R. § 1010.314 states that no person shall, for the purpose of evading the currency reporting requirements under the regulations, (i) cause or attempt to cause a domestic financial institution to fail to file a report required by the regulations; (ii) cause or attempt to cause a domestic financial institution to file a report required by the regulations containing a material omission or misstatement of fact; or (iii) structure, assist in structuring, or attempt to structure or assist in structuring, any transaction with one or more domestic financial institutions.

15. 31 C.F.R. § 1010.100(xx) defines "structuring" as when a person, who, acting alone or in conjunction with, or on behalf of others, "conducts or attempts to conduct one or more transactions in currency in any amount, at one or more financial institutions, on one or more days, in any manner," for the purpose of evading the regulations' reporting requirements.

The phrase “in any manner” includes the act of breaking down a single sum of currency exceeding \$10,000 into smaller sums at or below \$10,000, as well as conducting a series of transactions at or below \$10,000.

16. Structuring cash transactions violates FINRA Rule 2010.

***Iannazzo’s Training and Knowledge of Structuring and Federal Currency Reporting Requirements***

17. Iannazzo was aware of the currency reporting requirements for domestic financial institutions during the Relevant Period.

18. Merrill Lynch’s written policies and procedures in effect during the Relevant Period directed employees not to take any action, either personally or on behalf of the company, that violated any law, rule, regulation, or company policy, including money laundering.

19. Merrill Lynch’s financial crimes compliance policy advised employees, among other things, that the firm must file a CTR whenever an individual or entity conducts a currency transaction that exceeds \$10,000. The policy also explained that the firm must treat every transaction conducted on a single business day, including currency transactions at other locations, as one aggregate transaction when determining whether to file a CTR, and prohibited structuring transactions to evade this reporting requirement.

20. Merrill Lynch required its representatives to complete mandatory training regarding financial crimes on an annual basis, which in some years included money laundering and structuring. For example, in 2016, the firm’s training explained that structuring occurs when a person conducts one or more currency transactions to avoid the \$10,000 currency reporting threshold and includes both “[c]ash deposits or withdrawals slightly less than the \$10,000 reporting limit” and “[s]plitting cash deposits or withdrawals into multiple transactions to evade reporting limits.” The 2016 training, which Iannazzo completed on March 30, 2016, also

explained that “[l]egitimate funds can be structured” and advised employees that structuring transactions in a client or personal account is a felony and violation of company policy that would result in disciplinary action, up to and including termination.

21. Iannazzo completed this mandatory, annual training each year from 2014 through 2021.

22. In addition, during the Relevant Period, after questioning Iannazzo about his cash transactions, representatives of one of the banks at which Iannazzo made cash deposits and withdrawals provided him a FinCEN pamphlet on at least two occasions that explained both the CTR requirement and structuring and included examples of structured transactions that violate the law.

#### ***Iannazzo’s Cash Withdrawals and Deposits***

23. In 2014, Iannazzo began construction of a new home in Southport, Connecticut. Iannazzo and his family moved into the home in July 2015, while continuing construction. In 2017, Iannazzo added a pool. In late 2019, Iannazzo decided to build a combined pool house and in-law suite.

24. Iannazzo paid for these and other home improvements or expenses in cash, because vendors provided a cash discount and did not collect Connecticut’s 6.35% sales and use tax. Iannazzo also understood that paying the contractors (or their laborers) in cash would allow them to not report the cash as income on their taxes.

25. Iannazzo used two personal bank accounts and one firm account to withdraw the cash that he needed for household and construction expenses: a joint checking account at a local bank (the “Local Bank Account”), a joint checking account at Merrill Lynch’s affiliate bank (the

“Affiliate Bank Account”), and an individual cash management account at Merrill Lynch (the “Merrill Lynch Account”).

26. Iannazzo controlled all three accounts and frequently transferred money between them (and others) to fund his cash withdrawals.

27. Between December 2014 and March 2021, Iannazzo conducted 80 cash transactions in the Local Bank Account and the Affiliate Bank Account totaling approximately \$629,720. However, he never conducted a cash deposit or withdrawal in either of these accounts over \$10,000.

28. Instead, during this period, Iannazzo made 71 structured cash deposits and withdrawals totaling \$568,440 in the Local Bank Account and the Affiliate Bank Account, and he made 297 structured ATM deposits and withdrawals totaling \$277,450 in the Merrill Lynch Account, for a total of 368 structured cash transactions across the three accounts equaling \$845,890, as set forth in Attachment A.

29. For example, Iannazzo made the following structured transactions between December 2014 and November 2019:

a. Between December 16 and December 19, 2014, Iannazzo made daily withdrawals from the Merrill Lynch Account ranging from \$800 to \$2,500 (the daily ATM withdrawal limit), for a total of \$10,700;

b. Iannazzo withdrew \$2,950 from the Local Bank Account on March 5, 2015, and \$9,500 from the account on March 6, 2015, for a total of \$12,450;

c. Between October 5 and October 9, 2015, Iannazzo made daily ATM withdrawals of \$2,400 (once) and \$2,500 (four times) from the Merrill Lynch Account, for a total of \$12,400;

d. Iannazzo withdrew \$9,000 from the Local Bank Account on November 18, 2015, \$8,500 from the account on November 19, 2015, and \$9,000 from the account on November 20, 2015, for a total of \$26,500;

e. On November 3, 2016, Iannazzo withdrew \$9,000 from the Local Bank Account and \$2,500 from the Merrill Lynch Account, for a total of \$11,500;

f. On January 13, 2017, Iannazzo withdrew \$8,700 from the Local Bank Account and \$2,400 from the Merrill Lynch Account, for a total of \$11,100;

g. Between March 8 and March 17, 2017, Iannazzo withdrew a total of \$28,800 from the Local Bank Account and the Merrill Lynch Account, including \$8,800 withdrawn on March 9 from the Local Bank Account and \$2,400 from the Merrill Lynch Account for a total of \$11,200 that day, and \$8,000 withdrawn from the Local Bank Account on March 17 and \$2,400 from the Merrill Lynch Account for a total of \$10,400 that day;

h. Between September 13 and September 20, 2017, Iannazzo withdrew a total of \$20,000 from the Local Bank Account and the Merrill Lynch Account, including \$9,000 withdrawn on September 20 from the Local Bank Account and \$1,400 from the Merrill Lynch Account, for a total of \$10,400 that day;

i. Between June 4 and June 16, 2019, Iannazzo withdrew a total of \$25,500 from the Local Bank Account and the Merrill Lynch Account, including \$9,700 withdrawn on June 7 from the Local Bank Account and \$2,500 from the Merrill Lynch Account, for a total of \$12,200 that day; and

j. In November 2019, Iannazzo withdrew a total of \$30,000 from the Local Bank Account in four separate transactions at four different branches:

<b>Date</b>	<b>Amount</b>	<b>Location</b>
11/13/2019	\$8,000	2000 Post Road, Fairfield, CT
11/16/2019	\$7,500	20 South Compo Road, Westport, CT
11/21/2019	\$7,000	255 Tunxis Hill Road, Fairfield, CT
11/23/2019	\$7,500	850 East Main Street, Stamford, CT

30. Iannazzo continued to structure cash transactions in his accounts in 2020 and 2021. For example, between January 2020 and April 2021, Iannazzo conducted the following structured transactions:

a. In March 2020, Iannazzo delayed the construction of his pool house and deposited a total of \$24,900 in cash refunds that he received into the Local Bank Account through structured deposits of \$8,700 on March 6, \$9,000 on March 7, and \$7,200 on March 11. Iannazzo had a check drawn on the Local Bank Account for \$25,000 payable to Merrill Lynch on March 11.

b. In April 2020, Iannazzo deposited a total of \$22,000 into the Local Bank Account, in deposits of \$8,500 on April 3, \$8,000 on April 7, and \$5,500 on April 17. Iannazzo had a check drawn on the Local Bank Account for \$22,000 payable to Merrill Lynch on April 17.

c. In October 2020, Iannazzo restarted his pool house project and withdrew \$8,500 from the Local Bank Account on October 1, followed by withdrawals of \$8,500 on October 3, \$9,000 on October 6, \$8,500 on October 9, \$8,500 on October 13, and \$1,000 on October 13, for a total of \$44,000.



d. Between September 29 and October 13, 2020, Iannazzo also withdrew \$27,500 in cash from the Merrill Lynch Account through ATM withdrawals at the daily limit of \$2,500 conducted on 11 separate days.

e. In November and December 2020, after canceling the pool house project again, Iannazzo made a series of deposits, alternating between the Local Bank Account and the Affiliate Bank Account, for a total of \$59,840:

<b>Date</b>	<b>Amount</b>	<b>Account</b>
11/13/2020	\$8,340	Affiliate Bank Account
11/16/2020	\$8,000	Local Bank Account
11/25/2020	\$9,000	Affiliate Bank Account
12/1/2020	\$8,500	Local Bank Account
12/15/2020	\$7,500	Affiliate Bank Account
12/23/2020	\$9,000	Local Bank Account
12/23/2020	\$9,500	Affiliate Bank Account

f. In January 2021, Iannazzo made a series of deposits in the Local Bank Account, the Affiliate Bank Account, and the Merrill Lynch Account for a total of \$59,300, including ATM deposits into the Merrill Lynch Account of \$7,500 on January 27 and \$7,500 on January 29:

<b>Date</b>	<b>Amount</b>	<b>Account</b>
1/8/21	\$8,300	Local Bank Account
1/15/21	\$9,000	Local Bank Account
1/20/21	\$9,000	Affiliate Bank Account
1/22/21	\$9,000	Local Bank Account
1/27/21	\$7,500	Merrill Lynch Account
1/29/21	\$7,500	Merrill Lynch Account
1/30/21	\$9,000	Local Bank Account

g. In February 2021, Iannazzo made a series of deposits in the Local Bank Account, the Affiliate Bank Account, and the Merrill Lynch Account for a total of \$42,800:

<b>Date</b>	<b>Amount</b>	<b>Account</b>
2/2/21	\$8,500	Affiliate Bank Account
2/9/21	\$9,000	Local Bank Account
2/23/21	\$9,000	Local Bank Account
2/24/21	\$8,800	Affiliate Bank Account
2/26/21	\$7,500	Merrill Lynch Account

h. In March 2021, Iannazzo made a series of deposits in the Local Bank Account, the Affiliate Bank Account, and the Merrill Lynch Account for a total of \$38,400:

<b>Date</b>	<b>Amount</b>	<b>Account</b>
3/2/21	\$7,500	Local Bank Account
3/4/21	\$9,000	Affiliate Bank Account
3/8/21	\$7,500	Merrill Lynch Account
3/19/21	\$6,400	Merrill Lynch Account
3/24/21	\$8,000	Local Bank Account

31. Iannazzo stopped conducting large cash transactions in his financial accounts shortly after receiving a May 10, 2021 request from FINRA for documents and information regarding his personal bank and brokerage account activity.

32. Iannazzo intentionally structured 368 transactions, totaling \$845,890 in cash deposits and withdrawals, in his three bank and firm accounts during the Relevant Period to evade the federal reporting requirements in 31 U.S.C. § 5313 and 31 C.F.R. § 1010, in that he acted with the purpose of preventing the financial institutions from filing and/or intended to cause the bank to fail to file a CTR reporting a cash transaction over \$10,000.

33. By virtue of the foregoing conduct, Iannazzo violated FINRA Rule 2010.

**RELIEF REQUESTED**

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

- A. make findings of fact and conclusions of law that Iannazzo committed the violations charged and alleged herein;
- B. order that one or more of the sanctions provided under FINRA Rule 8310(a), including monetary sanctions, be imposed; and
- C. order that Iannazzo bears such costs of proceeding as are deemed fair and appropriate under the circumstances in accordance with FINRA Rule 8330.

**FINRA DEPARTMENT OF ENFORCEMENT**

Date: June 23, 2023



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# ATTACHMENT A

<b>Date</b>	<b>Transaction</b>	<b>Local Bank Account</b>	<b>Affiliate Bank Account</b>	<b>Merrill Lynch Account</b>
12/7/2014	ATM Withdrawal			(\$1,000)
12/7/2014	ATM Withdrawal			(\$500)
12/7/2014	ATM Withdrawal			(\$1,000)
12/8/2014	Withdrawal	(\$9,500)		
12/12/2014	ATM Withdrawal			(\$1,000)
12/12/2014	ATM Withdrawal			(\$1,000)
12/12/2014	ATM Withdrawal			(\$500)
12/16/2014	ATM Withdrawal			(\$800)
12/16/2014	ATM Withdrawal			(\$800)
12/16/2014	ATM Withdrawal			(\$800)
12/16/2014	ATM Withdrawal			(\$1,000)
12/16/2014	ATM Withdrawal			(\$500)
12/16/2014	ATM Withdrawal			(\$1,000)
12/17/2014	ATM Withdrawal			(\$1,000)
12/17/2014	ATM Withdrawal			(\$1,000)
12/17/2014	ATM Withdrawal			(\$500)
12/18/2014	ATM Withdrawal			(\$800)
12/19/2014	ATM Withdrawal			(\$1,000)
12/19/2014	ATM Withdrawal			(\$1,000)
12/19/2014	ATM Withdrawal			(\$500)
3/5/2015	Withdrawal	(\$2,950)		
3/6/2015	Withdrawal	(\$9,500)		
10/5/2015	ATM Withdrawal			(\$1,000)
10/5/2015	ATM Withdrawal			(\$1,000)
10/5/2015	ATM Withdrawal			(\$500)
10/6/2015	ATM Withdrawal			(\$1,000)
10/6/2015	ATM Withdrawal			(\$1,000)
10/6/2015	ATM Withdrawal			(\$400)
10/7/2015	Withdrawal	(\$9,000)		
10/7/2015	ATM Withdrawal			(\$1,000)
10/7/2015	ATM Withdrawal			(\$1,000)
10/7/2015	ATM Withdrawal			(\$500)
10/8/2015	Withdrawal	(\$7,500)		

10/8/2015	ATM Withdrawal			(\$1,000)
10/8/2015	ATM Withdrawal			(\$1,000)
10/8/2015	ATM Withdrawal			(\$500)
10/9/2015	Withdrawal	(\$9,000)		
10/9/2015	ATM Withdrawal			(\$1,000)
10/9/2015	ATM Withdrawal			(\$1,000)
10/9/2015	ATM Withdrawal			(\$500)
11/9/2015	Withdrawal	(\$8,000)		
11/18/2015	ATM Withdrawal			(\$1,000)
11/18/2015	ATM Withdrawal			(\$1,000)
11/18/2015	ATM Withdrawal			(\$500)
11/18/2015	Withdrawal	(\$9,000)		
11/19/2015	ATM Withdrawal			(\$1,000)
11/19/2015	ATM Withdrawal			(\$1,000)
11/19/2015	ATM Withdrawal			(\$500)
11/19/2015	Withdrawal	(\$8,500)		
11/20/2015	Withdrawal	(\$9,000)		
12/3/2015	Withdrawal	(\$8,000)		
12/3/2015	ATM Withdrawal			(\$1,000)
12/3/2015	ATM Withdrawal			(\$1,000)
12/3/2015	ATM Withdrawal			(\$500)
12/4/2015	Withdrawal	(\$7,500)		
5/3/2016	Withdrawal	(\$3,200)		
5/10/2016	ATM Withdrawal			(\$1,000)
5/10/2016	ATM Withdrawal			(\$500)
5/10/2016	ATM Withdrawal			(\$1,000)
5/11/2016	Withdrawal	(\$7,000)		
5/11/2016	ATM Withdrawal			(\$1,200)
5/11/2016	ATM Withdrawal			(\$800)
5/11/2016	ATM Withdrawal			(\$700)
5/11/2016	ATM Withdrawal			(\$800)
10/31/2016	ATM Withdrawal			(\$1,000)
10/31/2016	ATM Withdrawal			(\$500)
10/31/2016	ATM Withdrawal			(\$1,000)
11/1/2016	ATM Withdrawal			(\$1,000)

11/1/2016	ATM Withdrawal			(\$1,000)
11/1/2016	ATM Withdrawal			(\$500)
11/2/2016	ATM Withdrawal			(\$1,000)
11/2/2016	ATM Withdrawal			(\$500)
11/2/2016	ATM Withdrawal			(\$1,000)
11/3/2016	Withdrawal	(\$9,000)		
11/3/2016	ATM Withdrawal			(\$800)
11/3/2016	ATM Withdrawal			(\$800)
11/3/2016	ATM Withdrawal			(\$800)
11/3/2016	ATM Withdrawal			(\$100)
12/28/2016	ATM Withdrawal			(\$1,000)
12/28/2016	ATM Withdrawal			(\$500)
12/28/2016	ATM Withdrawal			(\$1,000)
12/29/2016	ATM Withdrawal			(\$1,000)
12/29/2016	ATM Withdrawal			(\$1,000)
1/8/2017	ATM Withdrawal			(\$500)
1/8/2017	ATM Withdrawal			(\$1,000)
1/8/2017	ATM Withdrawal			(\$1,000)
1/9/2017	ATM Withdrawal			(\$500)
1/9/2017	ATM Withdrawal			(\$1,000)
1/9/2017	ATM Withdrawal			(\$1,000)
1/10/2017	ATM Withdrawal			(\$500)
1/10/2017	ATM Withdrawal			(\$1,000)
1/10/2017	ATM Withdrawal			(\$1,000)
1/11/2017	ATM Withdrawal			(\$1,000)
1/11/2017	ATM Withdrawal			(\$500)
1/11/2017	ATM Withdrawal			(\$1,000)
1/13/2017	ATM Withdrawal			(\$800)
1/13/2017	ATM Withdrawal			(\$800)
1/13/2017	ATM Withdrawal			(\$800)
1/13/2017	Withdrawal	(\$8,700)		
1/16/2017	ATM Withdrawal			(\$500)
1/16/2017	ATM Withdrawal			(\$1,000)
1/16/2017	ATM Withdrawal			(\$1,000)
1/17/2017	ATM Withdrawal			(\$800)

1/17/2017	ATM Withdrawal			(\$800)
1/17/2017	ATM Withdrawal			(\$800)
1/17/2017	Withdrawal	(\$9,100)		
3/8/2017	ATM Withdrawal			(\$800)
3/8/2017	ATM Withdrawal			(\$800)
3/8/2017	ATM Withdrawal			(\$800)
3/9/2017	Withdrawal	(\$8,800)		
3/9/2017	ATM Withdrawal			(\$800)
3/9/2017	ATM Withdrawal			(\$800)
3/9/2017	ATM Withdrawal			(\$800)
3/13/2017	ATM Withdrawal			(\$800)
3/13/2017	ATM Withdrawal			(\$800)
3/13/2017	ATM Withdrawal			(\$800)
3/16/2017	ATM Withdrawal			(\$800)
3/16/2017	ATM Withdrawal			(\$800)
3/16/2017	ATM Withdrawal			(\$800)
3/17/2017	Withdrawal	(\$8,000)		
3/17/2017	ATM Withdrawal			(\$800)
3/17/2017	ATM Withdrawal			(\$800)
3/17/2017	ATM Withdrawal			(\$800)
4/21/2017	ATM Withdrawal			(\$800)
4/21/2017	ATM Withdrawal			(\$800)
4/21/2017	ATM Withdrawal			(\$800)
4/27/2017	ATM Withdrawal			(\$800)
4/27/2017	ATM Withdrawal			(\$800)
4/27/2017	ATM Withdrawal			(\$800)
4/28/2017	ATM Withdrawal			(\$800)
4/28/2017	ATM Withdrawal			(\$800)
4/28/2017	ATM Withdrawal			(\$800)
5/1/2017	ATM Withdrawal			(\$800)
5/1/2017	ATM Withdrawal			(\$800)
5/1/2017	ATM Withdrawal			(\$800)
5/2/2017	Withdrawal	(\$8,500)		
5/2/2017	ATM Withdrawal			(\$800)
5/2/2017	ATM Withdrawal			(\$800)



5/2/2017	ATM Withdrawal			(\$800)
5/25/2017	ATM Withdrawal			(\$400)
5/25/2017	ATM Withdrawal			(\$1,000)
5/25/2017	ATM Withdrawal			(\$1,000)
5/26/2017	ATM Withdrawal			(\$800)
5/26/2017	ATM Withdrawal			(\$800)
5/26/2017	ATM Withdrawal			(\$800)
5/31/2017	ATM Withdrawal			(\$1,000)
5/31/2017	ATM Withdrawal			(\$800)
5/31/2017	ATM Withdrawal			(\$700)
6/6/2017	ATM Withdrawal			(\$800)
6/6/2017	ATM Withdrawal			(\$800)
6/6/2017	ATM Withdrawal			(\$800)
6/7/2017	ATM Withdrawal			(\$800)
6/7/2017	ATM Withdrawal			(\$800)
6/7/2017	ATM Withdrawal			(\$800)
6/8/2017	ATM Withdrawal			(\$1,000)
6/8/2017	ATM Withdrawal			(\$1,000)
9/13/2017	ATM Withdrawal			(\$800)
9/13/2017	ATM Withdrawal			(\$800)
9/13/2017	ATM Withdrawal			(\$800)
9/13/2017	ATM Withdrawal			(\$800)
9/13/2017	ATM Withdrawal			(\$800)
9/13/2017	ATM Withdrawal			(\$800)
9/13/2017	ATM Withdrawal			(\$800)
9/15/2017	ATM Withdrawal			(\$800)
9/15/2017	ATM Withdrawal			(\$800)
9/15/2017	ATM Withdrawal			(\$800)
9/19/2017	ATM Withdrawal			(\$800)
9/19/2017	ATM Withdrawal			(\$800)
9/19/2017	ATM Withdrawal			(\$800)
9/20/2017	Withdrawal	(\$9,000)		
9/20/2017	ATM Withdrawal			(\$600)
9/20/2017	ATM Withdrawal			(\$800)
1/5/2018	Deposit	\$3,500		
1/5/2018	Deposit	\$5,000		

1/12/2018	Deposit	\$8,500		
6/4/2019	Withdrawal	(\$2,800)		
6/4/2019	ATM Withdrawal			(\$500)
6/4/2019	ATM Withdrawal			(\$1,000)
6/4/2019	ATM Withdrawal			(\$1,000)
6/6/2019	ATM Withdrawal			(\$500)
6/6/2019	ATM Withdrawal			(\$1,000)
6/6/2019	ATM Withdrawal			(\$1,000)
6/7/2019	Withdrawal	(\$9,700)		
6/7/2019	ATM Withdrawal			(\$1,000)
6/7/2019	ATM Withdrawal			(\$1,000)
6/7/2019	ATM Withdrawal			(\$500)
6/7/2019	ATM Withdrawal			(\$1,000)
6/7/2019	ATM Withdrawal			(\$1,000)
6/7/2019	ATM Withdrawal			(\$500)
6/15/2019	ATM Withdrawal			(\$1,000)
6/16/2019	ATM Withdrawal			(\$1,000)
6/16/2019	ATM Withdrawal			(\$1,000)
9/14/2019	ATM Withdrawal			(\$800)
9/14/2019	ATM Withdrawal			(\$800)
9/14/2019	ATM Withdrawal			(\$800)
9/16/2019	ATM Withdrawal			(\$1,000)
9/16/2019	ATM Withdrawal			(\$1,000)
9/16/2019	ATM Withdrawal			(\$500)
9/16/2019	ATM Withdrawal			(\$1,000)
9/16/2019	ATM Withdrawal			(\$500)
9/16/2019	ATM Withdrawal			(\$1,000)
9/18/2019	ATM Withdrawal			(\$1,000)
9/18/2019	ATM Withdrawal			(\$500)
9/18/2019	ATM Withdrawal			(\$1,000)
9/18/2019	ATM Withdrawal			(\$1,000)
9/18/2019	ATM Withdrawal			(\$500)
9/18/2019	ATM Withdrawal			(\$1,000)
9/20/2019	Withdrawal	(\$8,100)		
9/20/2019	ATM Withdrawal			(\$500)

9/20/2019	ATM Withdrawal			(\$1,000)
9/20/2019	ATM Withdrawal			(\$1,000)
9/20/2019	ATM Withdrawal			(\$1,000)
9/20/2019	ATM Withdrawal			(\$500)
9/20/2019	ATM Withdrawal			(\$1,000)
11/12/2019	ATM Withdrawal			(\$500)
11/12/2019	ATM Withdrawal			(\$1,000)
11/12/2019	ATM Withdrawal			(\$1,000)
11/13/2019	ATM Withdrawal			(\$1,000)
11/13/2019	ATM Withdrawal			(\$1,000)
11/13/2019	ATM Withdrawal			(\$500)
11/13/2019	Withdrawal	(\$8,000)		
11/14/2019	ATM Withdrawal			(\$1,000)
11/14/2019	ATM Withdrawal			(\$1,000)
11/14/2019	ATM Withdrawal			(\$500)
11/15/2019	ATM Withdrawal			(\$1,000)
11/15/2019	ATM Withdrawal			(\$1,000)
11/15/2019	ATM Withdrawal			(\$500)
11/16/2019	Withdrawal	(\$7,500)		
11/18/2019	ATM Withdrawal			(\$500)
11/18/2019	ATM Withdrawal			(\$1,000)
11/18/2019	ATM Withdrawal			(\$1,000)
11/21/2019	Withdrawal	(\$7,000)		
11/21/2019	ATM Withdrawal			(\$1,000)
11/21/2019	ATM Withdrawal			(\$1,000)
11/21/2019	ATM Withdrawal			(\$500)
11/23/2019	Withdrawal	(\$7,500)		
11/25/2019	ATM Withdrawal			(\$1,000)
11/25/2019	ATM Withdrawal			(\$1,000)
11/25/2019	ATM Withdrawal			(\$500)
11/27/2019	ATM Withdrawal			(\$650)
1/2/2020	ATM Withdrawal			(\$1,000)
1/2/2020	ATM Withdrawal			(\$500)
1/2/2020	ATM Withdrawal			(\$1,000)
1/6/2020	ATM Withdrawal			(\$1,000)

1/6/2020	ATM Withdrawal			(\$500)
1/6/2020	ATM Withdrawal			(\$1,000)
1/6/2020	ATM Withdrawal			(\$1,000)
1/6/2020	ATM Withdrawal			(\$500)
1/6/2020	ATM Withdrawal			(\$1,000)
1/8/2020	ATM Withdrawal			(\$500)
1/8/2020	ATM Withdrawal			(\$1,000)
1/8/2020	ATM Withdrawal			(\$1,000)
1/10/2020	ATM Withdrawal			(\$1,000)
1/10/2020	ATM Withdrawal			(\$1,000)
1/10/2020	ATM Withdrawal			(\$500)
1/10/2020	Withdrawal	(\$8,500)		
1/13/2020	Withdrawal	(\$8,500)		
1/13/2020	ATM Withdrawal			(\$500)
1/13/2020	ATM Withdrawal			(\$1,000)
1/13/2020	ATM Withdrawal			(\$1,000)
1/13/2020	ATM Withdrawal			(\$1,000)
1/13/2020	ATM Withdrawal			(\$500)
1/13/2020	ATM Withdrawal			(\$1,000)
1/13/2020	ATM Withdrawal			(\$500)
1/13/2020	ATM Withdrawal			(\$1,000)
1/13/2020	ATM Withdrawal			(\$1,000)
1/14/2020	ATM Withdrawal			(\$1,000)
1/14/2020	ATM Withdrawal			(\$1,000)
1/14/2020	ATM Withdrawal			(\$500)
1/15/2020	ATM Withdrawal			(\$1,000)
1/15/2020	ATM Withdrawal			(\$1,000)
1/15/2020	ATM Withdrawal			(\$500)
1/15/2020	Withdrawal	(\$9,000)		
1/16/2020	ATM Withdrawal			(\$500)
1/16/2020	ATM Withdrawal			(\$1,000)
1/16/2020	ATM Withdrawal			(\$1,000)
1/17/2020	ATM Withdrawal			(\$1,000)
1/17/2020	ATM Withdrawal			(\$500)
1/17/2020	ATM Withdrawal			(\$1,000)

1/17/2020	Withdrawal	(\$9,000)		
3/6/2020	Deposit	\$8,700		
3/7/2020	Deposit	\$9,000		
3/11/2020	Deposit	\$7,200		
4/3/2020	Deposit	\$8,500		
4/7/2020	Deposit	\$8,000		
4/17/2020	Deposit	\$5,500		
7/8/2020	Deposit	\$9,000		
7/18/2020	Deposit	\$8,250		
7/23/2020	Deposit	\$8,500		
8/26/2020	Deposit	\$7,500		
8/28/2020	Deposit	\$9,000		
9/8/2020	ATM Withdrawal			(\$1,000)
9/8/2020	ATM Withdrawal			(\$500)
9/8/2020	ATM Withdrawal			(\$1,000)
9/8/2020	ATM Withdrawal			(\$1,000)
9/8/2020	ATM Withdrawal			(\$1,000)
9/8/2020	ATM Withdrawal			(\$500)
9/14/2020	ATM Withdrawal			(\$500)
9/14/2020	ATM Withdrawal			(\$1,000)
9/14/2020	ATM Withdrawal			(\$1,000)
9/17/2020	ATM Withdrawal			(\$1,000)
9/17/2020	ATM Withdrawal			(\$1,000)
9/17/2020	ATM Withdrawal			(\$500)
9/21/2020	ATM Withdrawal			(\$500)
9/21/2020	ATM Withdrawal			(\$1,000)
9/21/2020	ATM Withdrawal			(\$1,000)
9/29/2020	ATM Withdrawal			(\$500)
9/29/2020	ATM Withdrawal			(\$1,000)
9/29/2020	ATM Withdrawal			(\$1,000)
10/1/2020	Withdrawal	(\$8,500)		
10/1/2020	ATM Withdrawal			(\$1,000)
10/1/2020	ATM Withdrawal			(\$500)
10/1/2020	ATM Withdrawal			(\$1,000)
10/2/2020	ATM Withdrawal			(\$1,000)

10/2/2020	ATM Withdrawal			(\$500)
10/2/2020	ATM Withdrawal			(\$1,000)
10/3/2020	Withdrawal	(\$8,500)		
10/6/2020	Withdrawal	(\$9,000)		
10/6/2020	ATM Withdrawal			(\$500)
10/6/2020	ATM Withdrawal			(\$1,000)
10/6/2020	ATM Withdrawal			(\$1,000)
10/6/2020	ATM Withdrawal			(\$1,000)
10/6/2020	ATM Withdrawal			(\$1,000)
10/6/2020	ATM Withdrawal			(\$500)
10/7/2020	ATM Withdrawal			(\$1,000)
10/7/2020	ATM Withdrawal			(\$500)
10/7/2020	ATM Withdrawal			(\$1,000)
10/8/2020	ATM Withdrawal			(\$500)
10/8/2020	ATM Withdrawal			(\$1,000)
10/8/2020	ATM Withdrawal			(\$1,000)
10/9/2020	Withdrawal	(\$8,500)		
10/9/2020	ATM Withdrawal			(\$500)
10/9/2020	ATM Withdrawal			(\$1,000)
10/9/2020	ATM Withdrawal			(\$1,000)
10/13/2020	Withdrawal	(\$1,000)		
10/13/2020	Withdrawal	(\$8,500)		
10/13/2020	ATM Withdrawal			(\$1,000)
10/13/2020	ATM Withdrawal			(\$1,000)
10/13/2020	ATM Withdrawal			(\$500)
10/13/2020	ATM Withdrawal			(\$1,000)
10/13/2020	ATM Withdrawal			(\$500)
10/13/2020	ATM Withdrawal			(\$1,000)
10/13/2020	ATM Withdrawal			(\$1,000)
10/13/2020	ATM Withdrawal			(\$1,000)
10/13/2020	ATM Withdrawal			(\$500)
11/13/2020	Deposit		\$8,340	
11/16/2020	Deposit	\$8,000		
11/25/2020	Deposit		\$9,000	
12/1/2020	Deposit	\$8,500		

12/15/2020	Deposit		\$7,500	
12/23/2020	Deposit	\$9,000		
12/23/2020	Deposit		\$9,500	
1/8/2021	Deposit	\$8,300		
1/15/2021	Deposit	\$9,000		
1/20/2021	Deposit		\$9,000	
1/22/2021	Deposit	\$9,000		
1/27/2021	ATM Deposit			\$7,500
1/29/2021	ATM Deposit			\$7,500
1/30/2021	Deposit	\$9,000		
2/2/2021	Deposit		\$8,500	
2/9/2021	Deposit	\$9,000		
2/23/2021	Deposit	\$9,000		
2/24/2021	Deposit		\$8,800	
2/26/2021	ATM Deposit			\$7,500
3/2/2021	Deposit	\$7,500		
3/4/2021	Deposit		\$9,000	
3/8/2021	ATM Deposit			\$7,500
3/19/2021	ATM Deposit			\$6,400
3/24/2021	Deposit	\$8,000		