

Sabadell Securities USA Inc.

Firm Brochure

(Part 2A of Form ADV)

2 South Biscayne Blvd., Suite 3301
Miami, FL 33131

Updated: March 2011

This brochure provides information about the qualifications and business practices of Sabadell Securities USA, Inc. (“Sabadell”). If you have any questions about the contents of this brochure, please contact us at 786-587-1600. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Sabadell is also available on the SEC’s website at: www.adviserinfo.sec.gov.

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

The U.S. Securities and Exchange Commission (“SEC”) issued a final rule in July 2010 requiring advisors to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization. As such, we have revised our ADV Part 2 form to reflect this new rule.

In August 2010, the SEC approved Sabadell’s application for registration as an Investment Adviser. Sabadell’s business activities have not changed materially since the time of this approval.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: (786) 587-1600.

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Advisory Business

Firm Description

Sabadell Securities USA, Inc. (“Sabadell” or “We”), a State of Florida registered Investment Adviser and FINRA registered broker-dealer, provides investment supervisory services to its brokerage clients who wish to engage Sabadell for fee based asset management services. Sabadell’s clients include various categories of institutional and individual clients. Accounts are normally managed using mutual funds, equities and fixed income securities on an asset allocation basis. Investment services are provided on a discretionary basis as stated in the investment advisory agreement signed with the client. Account supervision is guided by the stated objectives of the client (i.e., growth, income, etc.). Sabadell will assist the client with identifying investment objectives by assessing the client's risk tolerance based upon their age, income, need for cash flow, investment goals, and emotional tolerance for volatility. Strategies are then developed and implemented through an optimal combination of investments. When constructing portfolios, Sabadell will determine how to allocate funds across different asset classes and securities.

Principal Owners

Sabadell Securities USA, Inc. is a wholly-owned subsidiary of Banco de Sabadell, S.A., Spain (“Parent”). There are no intermediate subsidiaries.

Types of Advisory Services

The type of advisory service offered by Sabadell is Discretionary Investment Supervisory Services (i.e. “discretionary asset management”) and investment advice.

In performing its services, Sabadell is not required to verify any information received from the client or from the client's other professionals. Each client is advised that it remains his/her responsibility to promptly notify Sabadell when there is any change in his/her financial situation and/or financial objectives for the purpose of reviewing, evaluating, or revising previous recommendations and/or services.

Fees and Compensation

Description

For discretionary asset management services, compensation is derived from fee income based upon a percentage of assets under management, up to 1.00%, plus trading fees. The compensation method is explained and agreed with the client in advance before any services are rendered. The annual management fee for our services includes developing and implementing an investment policy and objectives, formulating a quantitatively driven asset allocation analysis and recommendation and monitoring a client’s investment results. Management fees are charged quarterly in arrears based on the total asset value of the clients’ account on the last business day of the preceding calendar quarter.

Fee Billing

Investment management services begin on the date the client signs the Investment Advisory Agreement (“Agreement”). For that calendar quarter, fees will be adjusted pro rata based upon the number of calendar days in the calendar quarter that the Agreement was in effect. Fees will generally be deducted directly from the client's custodial account pursuant to the Agreement. Fees are generally non-negotiable; however Sabadell reserves the right to adjust the fee schedule for accounts depending on the size and type of account, the level of activity in other accounts maintained at Sabadell by the same customer and the services required.

Sabadell may waive or negotiate lower fees for certain clients, such as charitable organizations or employees’ family members.

Other Fees

Advisory fees charged by Sabadell are separate and distinct from fees and expenses charged by mutual funds, which may be recommended to clients. A description of these fees and expenses is available in each fund's prospectus. Additionally, the fees charged by Sabadell are exclusive of all custodial and transaction costs paid to custodians, brokers or any other third parties. Clients should review all fees charged by the Adviser, custodians and brokers and others to fully understand the total amount of fees incurred.

Termination of Agreement

Either Sabadell or the client may terminate the Agreement at any time upon 30 days advance written notice. If a client terminates the investment management agreement with Sabadell in the middle of a billing period Sabadell will invoice the client for an amount that is pro-rated based on the number of days that the account was managed. The client can cancel the Agreement without penalty within the first five business days after the signing of the Agreement.

Compensation for Sales of Investment Products

The Firm’s compensation is solely from fees paid directly by clients. The Firm does not receive commissions based on the client’s purchase of any financial product, including insurance. No commission in any form is accepted.

Performance Based Fees and Side-by-Side Management

Sharing of Capital Gains

Sabadell does not charge any performance-based fees because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client. However, the nature of asset-based fees allows Sabadell to participate in the growth of the client’s wealth. This also means that our fees decline when the client’s portfolio declines in value.

Types of Clients

Description

Sabadell primarily provides customized investment management services to high-net-worth individuals and associated trusts, estates, pension and profit sharing plans, and other legal entities. Sabadell's minimum account size is generally \$100,000. However, Sabadell has discretion to waive the account minimum.

Methods of Analysis, Investment Strategies and Risk of Loss

Method of Analysis

Sabadell will conduct fundamental analysis on all securities recommended for client accounts. This analysis varies depending on the security in question. For stocks and bonds the analysis generally includes a review of:

- The issuer's management;
- The amount and volatility of past profits or losses;
- The issuer's assets and liabilities, as well as any material changes from historical norms;
- Prospects for the issuer's industry, as well as the issuer's competitive position within that industry; and
- Any other factors considered relevant.

For mutual funds and ETFs the analysis generally includes a review of:

- The fund's management team;
- The fund's historical risk and return characteristics;
- The fund's exposure to sectors and individual issuers;
- The fund's fee structure; and
- Any other factors considered relevant.

Investment Strategies

Occasionally, Sabadell may, to the extent allowable under FINRA rules, purchase equity securities that are part of an initial public offering ("New Issues") for client accounts. New issues shall be allocated to client accounts on a prorated basis weighted by the assets under management. Sensitive allocation issues arise when Sabadell is given the opportunity to participate in an offering that is expected to be over-subscribed, or to purchase a limited

position in a security that might be appropriate for multiple advisory clients. Because hot issue premiums provide the potential of an immediate profit and since Sabadell may typically receive only a small portion of the allotments sought, Sabadell will exercise particular care in the allocation of these securities. However, in the event that clients are not suitable for the IPO such clients will be excluded from the allocation. In addition, if a client is suitable but was not allocated a particular IPO due to the number of shares that were made available to Sabadell, then those clients will receive priority on the next IPO that Sabadell receives if the IPO is deemed by Sabadell to be suitable.

Depending on a client's investment objectives, Sabadell might engage in short selling or option writing. The use of short selling and option writing poses additional risks that are discussed in detail with any clients who are considering the use of these investment vehicles.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach keeps the risk of loss in mind. However, as with all investments, clients face investment risks including the following: Loss of Principal Risk, Interest-rate Risk, market Risk, Inflation Risk, Currency Risk, Reinvestment Risk, Business Risk, Liquidity Risk, and Financial Risk.

Disciplinary Information

Legal and Disciplinary

The Firm and its employees have not been involved in any legal or disciplinary events related to past or present activities.

Other Financial Industry Activities and Affiliations

Activities

Sabadell is a FINRA registered broker-dealer firm and as such will engage in traditional brokerage activities. The principals will function in a dual capacity with their responsibilities shared between the broker and advisory activities.

Sabadell has a dual employment arrangement with Banco Sabadell S.A.-Miami Branch ("Branch") whereby some employees of the Branch will also serve as employees of Sabadell.

Affiliations

Sabadell and its employees do not have any relationships or arrangements with non-affiliated financial services companies that pose material conflicts of interest.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

Sabadell has adopted a written code of ethics (“Code”) that is applicable to all employees. Among other things, the code requires Sabadell and its employees to act in clients’ best interests, abide by all applicable regulations, avoid even the appearance of insider trading, and pre-clear and report on many types of personal securities transactions. Sabadell’s restrictions on personal securities trading apply to employees, as well as employees’ family members living in the same household. A copy of Sabadell’s code of ethics is available upon request.

Sabadell permits its employees to engage, on a limited basis, in personal securities transactions. To avoid any potential conflicts of interest involving personal trades, Sabadell’s Code requires, among other things, that its employees:

1. Place client interests ahead of their own,
2. Engage in personal investing that is in full compliance with the Code,
3. Avoid taking advantage of their position, and
4. Maintain full compliance with applicable federal securities laws.

Sabadell’s Code also requires employees to: (1) pre-clear certain personal securities transactions, (2) report personal securities transactions on at least a quarterly basis, and (3) provide Sabadell with a detailed summary of holdings (both initially upon commencement of employment and annually thereafter) over which the employee has a direct or indirect beneficial interest.

Participation or Interest in Client Transactions

Sabadell maintains a watch list of securities that are being considered for client accounts, as well as securities already held in client accounts. Any proposed employee transaction involving securities on the watch list requires preclearance from the Chief Compliance Officer. The Chief Compliance Officer does not grant preclearance where it would appear that an employee’s trading could disadvantage Sabadell’s clients.

Under certain circumstances an employee might invest in a security that is not considered suitable for client accounts because of size, liquidity, or other factors. A change in these factors could result in the security becoming more suitable for clients, but the Chief Compliance Officer might not allow the security to be purchased for client accounts in order to avoid even the appearance of employees trading ahead of clients. In Sabadell’s experience, it is rare for an employee’s personal trading to limit clients’ investment opportunities, but such a situation may arise from time to time.

Brokerage Practices

General

Sabadell requires that clients be held with Pershing, LLC (“Pershing”). Sabadell will manage client assets held at Pershing and expects Pershing to offer good services at competitive prices.

Soft Dollars

Sabadell will receive certain products and services from Pershing free of charge or at discounted rates. These products and services may include:

- The receipt of duplicate client confirmations, statements, and other account information;
- Direct advisory fee debiting capabilities;
- Access to an electronic network for order entry, including the simultaneous entry of trades on behalf of multiple client accounts;
- A portfolio management system and software that supports Sabadell’s research processes.

Periodically Pershing may pay for Sabadell employees’ travel and accommodation costs in connection with industry conferences.

Sabadell does not expect clients whose accounts are held by Pershing to bear any additional costs in connection with Sabadell’s receipt of the products and services. Furthermore, Pershing’s provision of these products and services is not contingent upon Sabadell formally committing any specific amount of business to Pershing. However, Sabadell would not receive these products and services if client accounts were not held in custody and traded by Pershing.

The Selection of Trading Counterparties

Sabadell can typically trade accounts held at Pershing using other broker/dealers. However, Pershing charges clients trade-away fees that Sabadell believes outweigh any benefits from trading stocks, mutual funds, or ETFs with other brokers. The availability and pricing of bonds may vary more widely, so prior to placing a bond trade Sabadell will solicit bids from several dealers and then execute the trade with the dealer that offers sufficient liquidity and the most favorable pricing.

Some clients’ accounts may be relatively small, in which case the custodian may not allow Sabadell to trade through other firms. Other clients may specifically request that their accounts only be traded through a particular broker/dealer. Sabadell will trade these accounts through the firm chosen by the client, which may limit Sabadell’s ability to seek best execution. Trading restrictions may result in materially higher trading costs and reduced returns.

Best Execution Reviews

On at least an annual basis, Sabadell's Chief Compliance Officer and other senior executives will evaluate the pricing and services offered by Pershing and other trading counterparties with those offered by other reputable firms. Sabadell will seek to make a good-faith determination that Pershing and other chosen trading counterparties provide clients with good services at competitive prices. However, clients should be aware that this determination could have been influenced by Sabadell's receipt of products and services from Pershing. Historically Sabadell has concluded that Pershing is as good as, or better than, the other firms that have been considered. Sabadell will notify its clients if it determines that another firm offers better pricing and services than Pershing.

Aggregated Trades

Sabadell typically will aggregate client trades in an effort to treat all clients fairly. Clients participating in a bunched order receive the same average price and incur trading costs that are the same as would be paid if they were trading individually. Employees may be included side-by-side in bunched client trades. If an order is partially filled, clients will have their orders fully filled on a randomized basis; Sabadell will seek to complete any unfilled client orders on the next trading day. Employees will be excluded from bunched trades whenever client orders are only partially filled.

When trading accounts through Pershing and one or more other broker/dealers, Sabadell's trader may choose to place smaller trades ahead of larger trades when the smaller trades are not expected to materially affect the price or liquidity of the security in question. This practice may result in accounts held at Pershing trading after other accounts with disproportionate frequency. It is possible that, over time, this practice could result in clients whose accounts trade through other broker/dealers experiencing a benefit at the expense of the Pershing accounts.

Principal Transactions

From time to time, Sabadell may determine that it is in the best interest of one or more of its clients for Sabadell to sell a security to or purchase a security from such client. These principal transactions will not be effected until Sabadell has disclosed to the client the capacity in which it is acting and has obtained consent for the transaction.

As a general matter, when Sabadell engages in principal transactions it will price the securities involved in the transactions according to the following guidelines. Securities for which market quotations are readily available will be valued at market values determined by the securities' most recent sale price as determined from standard sources of financial information, such as the Bloomberg service, or the average between the last bid and the last ask price. For other types of securities, Sabadell uses independent third parties' prices. If Sabadell cannot obtain an independent third-party price or it determines that the third-parties' prices are incorrect, Sabadell will price the security based on the security's fair valuation.

Cross Trades

As is consistent with its duty to seek to obtain best execution, occasionally Sabadell may cross trades for client accounts. A cross trade occurs when Sabadell purchases and sells a particular security between two or more accounts under Sabadell's management by instructing brokers

to cross the trade. Sabadell generally utilizes “cross” trades to address account funding issues and when it specifically deems the practice to be advantageous for each participant. In no instance does Sabadell receive additional compensation when crossing trades for client accounts. Sabadell will seek to ensure that the terms of the transaction, including the consideration to be paid or received, are fair and reasonable, and the transactions is done for the sole benefit of the clients.

Brokerage Transactions in Traditional Brokerage Accounts

Sabadell effects, as broker, securities transactions for clients. Sabadell, as broker, has executed a fully disclosed clearing agreement with Pershing LLC. Therefore, trades are not executed by Sabadell, but by an exchange member firm pursuant to the clearing agreement. Sabadell receives compensation as the introducing broker.

Review of Accounts

Periodic Reviews

The frequency of reviews is agreed with each client. Reviews may vary in focus and may include asset allocation updates and rebalancing, performance reviews, investment reviews, cash flow monitoring, and more.

Review Triggers

Reviews of client accounts will also be triggered if a client changes his or her investment objectives, or if the market, political, or economic environment changes materially.

Regular Reports

Clients receive account statements directly from the custodian, Pershing, on at least a quarterly basis. Sabadell may supplement these custodial statements with reports provided during client meetings or as requested.

Client Referrals and Other Compensation

Incoming Referrals

Sabadell has entered into a referral arrangement with the Branch and Sabadell United Bank (“SUB”). Sabadell United Bank is a national charter Bank 98.33% owned by Banco Sabadell S.A., Sabadell’s parent company. In this referral arrangement, Sabadell will compensate the Branch and SUB for referring clients who want investment advisory services.

Sabadell’s payment of a referral does not affect the fees paid by any new or existing advisory client or investor. The referral arrangement will conform to Rule 206(4)-3 under the Investment Advisers Act of 1940, as amended, including that such referral arrangement is disclosed to prospective advisory clients and investors.

Sabadell does not compensate Pershing or any other custodian or broker/dealer for referring client accounts.

Referrals to Other Professionals

Other than the previously described referral arrangement, Sabadell does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred.

Custody

Account Statements

All clients' accounts will be held in custody by Pershing. Account custodians may send statements directly to the account owners on at least a quarterly basis. Clients should carefully review these statements, and should compare these statements to any account information provided by Sabadell.

SEC "Custody"

According to a recent ruling by the SEC, investment advisers are deemed to have "custody" of client funds if certain conditions are met. Sabadell may be technically considered to have "custody" of accounts, through its ability to debit advisory fees. The SEC requires an annual surprise audit of those "custodied" accounts by an independent CPA firm. Sabadell complies with this requirement.

Investment Discretion

Discretionary Authority for Trading

When a client agrees to discretionary management, Sabadell will be responsible for selecting the amount of securities to be bought and sold. The only limitations on the investment authority will be those limitations imposed in writing by the client.

In the course of providing our services, we will execute trades for our clients through broker-dealers. When a client has given us broker discretion, there is no restriction on the brokers we may select to execute client transactions. Our general guiding principle is to trade through broker-dealers who offer the best overall execution under the particular circumstances. With respect to execution, we consider a number of factors, including if the broker has custody of client assets, the actual handling of the order, the ability of the broker-dealer to settle the trade promptly and accurately, the financial standing of the broker-dealer, the ability of the broker-dealer to position stock to facilitate execution, our past experience with similar trades, and other factors which may be unique to a particular order. Based on these judgmental factors, we may trade through broker-dealers that charge fees that are higher than the lowest available fees.

Orders for the same security entered on behalf of more than one client will generally be aggregated (bunched) subject to the aggregation being in the best interests of all participating clients. Subsequent orders for the same security entered during the same trading day may be aggregated with any previously unfilled orders; filled orders shall be allocated separately from subsequent orders. All clients participating in each aggregated order shall receive the average price and if applicable, pay a pro-rata portion of commissions. Accounts that are beneficially

owned by Sabadell or its employee or access person may participate in aggregated orders under the same conditions as set forth above. Transactions are usually aggregated to seek a lower commission, lower costs, or a more advantageous net price.

Sabadell is not obligated to acquire for any account any security that we or our officers, partners, members or employees may acquire for their own accounts or for the account of any other client, if in Sabadell's absolute discretion it is not practical or desirable to acquire a position in such security.

Limited Power of Attorney

Clients must sign a limited power of attorney before Sabadell is given discretionary authority. The limited power of attorney is included in the account application.

Voting Client Securities

Proxy Votes

Among the services that Sabadell provides is that we may vote proxies on your behalf. We are charged with identifying the proxies upon which we will vote, voting the proxies in the best interest of clients, and submitting the proxies promptly and properly.

Our policy is to vote your proxies in the interest of maximizing investor value. To that end, Sabadell will vote in a way that it believes, consistent with its fiduciary duty, will cause the issue to increase the most or decline the least in value. Consideration will be given to both the short and long term implications of the proposal to be voted on when considering the optimal vote. We have currently identified no conflicts of interest between our client interests and our own within our proxy voting process.

As a matter of policy, Sabadell does not disclose how it expects to vote on upcoming proxies. Additionally, Sabadell does not disclose the way it voted proxies to unaffiliated third parties without a legitimate need to know such information. Our complete proxy voting policy and procedures are memorialized in writing and are available for review. In addition, our complete proxy voting record is available to our clients, and only to our clients. Please contact Sabadell if you have any questions or if you would like to review either of these documents.

Financial Information

Financial Condition

Sabadell does not have any financial impairment that will preclude the Firm from meeting contractual commitments to clients or affect its ability to manage client accounts.

Business Continuity Plan

General

Sabadell has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications or services.

Disasters

The Business Continuity Plan covers natural disasters such as storms, hurricanes, tornados, fire and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, bomb threat, communications line outage, internet outage. Electronic files are backed up daily and archived on and off site.

Alternate Office

Alternate work locations are identified to support ongoing operations in the event the main office is unavailable.

Information Security Program

Information Security

Sabadell maintains an information security program to reduce the risk that personal and confidential information may be breached.

Privacy Notice

Sabadell is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. The categories of nonpublic information that we collect from our clients may include information about personal finances, information about health to the extent that it is needed for the financial planning process, information about transactions between clients and third parties. We use this information to help our clients meet their personal financial goals.

We maintain a secure office to ensure that our clients' information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information will be maintained while you are a client of Sabadell and for the required retention period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We are required by law to deliver this Privacy Notice to our clients annually, in writing.

Sabadell Securities USA, Inc.
Brochure Supplement
Supervised Persons
(Part 2B of Form ADV)

2 South Biscayne Blvd., Suite 3301
Miami, FL 33131

Updated: March 2011

This brochure supplement provides information about Principals. It supplements Sabadell's accompanying Form ADV brochure. Please contact Sabadell's Chief Compliance Officer, Kyree Pina, at 786-587-1600 if you have any questions about the Form ADV brochure or this supplement, or if you would like to request additional or updated copies of either document.

Additional information is available on the SEC's website at www.adviserinfo.sec.gov.

Biographical Information

Gustavo A. Cano, President, Chief Executive Officer and Principal

Educational Background and Business Experience

Mr. Cano holds a degree in Theoretical Physics from UC (Spain), the Financial Risk Manager (FRM) and the CFA designations, FINRA Series 7, 24, 53 and 79.

In 1996, he was selected by BBVA on a national basis to form a group of 16 people dedicated to work with different areas of the Bank (Treasury, Asset Management, Brokerage and Private Wealth Management), in order to understand and improve the processes related to the market, as well as the products offered. In 1998, he was transferred to BBVA-Miami, where he worked as an Analyst and Portfolio Manager for Private Banking clients and providing advisory to some institutional money managers in Latin America. During that time, his duties included adviser to sophisticated clients regarding options and options strategies, specifically long calls, covered calls strategies on US and European stocks, naked sold puts on US stocks, and long puts on stock indexes and individual stocks.

In 2002, Mr. Cano joined Banco Sabadell-Miami Branch as Investments and Private Banking Manager, where he was in charge of the origination, development and commercialization of all investment products and services supervising a group of more than 15 people. He was also in charge of development and implementation of the risk management module and procedures to control the collateral for options strategies in client's portfolios.

Presently, he is the President and CEO of Sabadell Securities USA, Inc. and Senior Vice President, and Head of Treasury and Investments for Banco Sabadell America. Mr. Cano has extensive experience in Portfolio Management, product development, and the securities business in the United States, where he has spent most of his professional career.

Disciplinary Information

Mr. Cano has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Cano or of Sabadell.

Other Business Activities

Mr. Cano is the Head of Treasury of Banco de Sabadell, S.A.-Miami Branch and Chief Investment Officer for Sabadell United Bank.

Additional Compensation

Mr. Cano does not receive economic benefits from any person or entity other than Sabadell and the Branch in connection with the provision of investment advice to clients.

Supervision

As Sabadell's Chief Executive Officer, Mr. Cano maintains ultimate responsibility for the company's operations. Mr. Cano discusses investment decisions with Management Committee

members. Operational decisions are discussed with Sabadell's Chief Operating Officer and Chief Compliance Officer. Any of these individuals can be reached directly by calling the telephone number on the cover of this brochure supplement.

Andrés von Dincklage, Risk Manager and Principal

Educational Background and Business Experience

Mr. von Dincklage is a Certified Public Accountant from Universidad Nacional de Buenos Aires, Argentina, July 1973 / December 1978. FINRA Series 7, 24, 4, 53 and 79

He has 30+ years experience in Corporate Banking and Risk Management in large international financial institutions (Citibank N.A., ABN Amro Bank and Banco de Sabadell S.A.). At ABN Amro he was Senior Vice President - Risk Management at the bank's headquarters in Amsterdam, The Netherlands, responsible for Telecomm, Media and Technology portfolio risk assessment.

Currently Mr. von Dincklage, aside from his position at Sabadell Securities USA, Inc. is Senior Vice President, Head of Risk and Compliance at Banco de Sabadell S.A.-Miami Branch, responsible for Risk Management, Credit, Credit Administration, Trade Finance, Middle Office, Compliance, Internal Control, and Documentation.

Disciplinary Information

Mr. von Dincklage has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. von Dincklage or of Sabadell.

Other Business Activities

Mr. von Dincklage is Senior Vice President; Head of Risk and Compliance at Banco de Sabadell S.A.-Miami Branch.

Additional Compensation

Mr. von Dincklage does not receive economic benefits from any person or entity other than Sabadell and the Branch in connection with the provision of investment advice to clients.

Supervision

Mr. von Dincklage is supervised by Sabadell's CEO, Mr. Gustavo Cano. Any of these individuals can be reached directly by calling the telephone number on the cover of this brochure supplement.

Virginia Labiste, Director of Trading Operations and ROP Principal

Educational Background and Business Experience

Ms. Labiste holds FINRA Series 4, 7, 24 & 79 additionally S.F.A. Registered Representative Securities Institute (A.S.I.) in the U.K.

She has just over 20 years in the Treasury area which includes Money-Markets deposits & Foreign exchange trader plus 7+ years responsibility for identifying, selecting, introducing

alternative products for the banks' clients. In 1991 she started at Banco Santander Miami Agency as Asst. Vice President FX/MM and then transferred to BBVA Miami Agency. After 4 years working at BBVA she was transferred to BBVA Privanza Bank in 1998 as V.P. Investment Director and was a Board member of Canal Trust Company in Jersey, Channel Island U.K.

Currently Ms. Labiste is the Director of Trading at Sabadell Securities and Treasury & Structured Products Manager at Banco Sabadell S.A.-Miami Branch

Disciplinary Information

Ms. Labiste has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Ms. Labiste or of Sabadell.

Other Business Activities

Ms. Labiste is V.P. Treasury/ Structured Products at Banco de Sabadell S.A.-Miami Branch.

Additional Compensation

Ms. Labiste does not receive economic benefits from any person or entity other than Sabadell and the Branch in connection with the provision of investment advice to clients.

Supervision

Ms. Labiste is supervised by Sabadell's CEO, Mr. Cano. Any of these individuals can be reached directly by calling the telephone number on the cover of this brochure supplement.

Kyree Pina, Chief Compliance Officer and Principal

Educational Background and Business Experience

Ms. Pina holds an MBA degree from the University of Florida, FINRA Series 7, 24, 63 and 79 and a FIBA CP/AML Certification. She has attended several courses, conferences, and seminars sponsored by regulatory agencies, and industry groups.

Since 1993, Ms Kyree D. Pina has accumulated professional experiences in the Compliance Department of a regulatory agency, as well as in the Compliance Departments of banks and securities firms in Florida.

She has served, for example, as a bank examiner with the Florida Department of Financial Regulations; as a compliance officer of Hencorp Becstone Securities, deputy compliance officer of Lloyds TSB Bank, Compliance Officer of ABN Amro, Operations Manager for BNP Paribas and Compliance Officer for BNP Securities and Compliance Manager of Banco Itau International. She now serves as the Senior Compliance Officer of Banco Sabadell and Chief compliance Officer of Sabadell Securities USA, Inc.

Her experiences include, examining for the safety and soundness of the Florida offices of foreign banking organizations; monitoring her employers' compliance with applicable laws, regulations

and rules; communicating with Federal and state regulatory agencies as well as with SROs (e.g. FINRA, and SEC), and clearing firms; addressing customers' complaints; monitoring electronic communications and account transactions for suitability; and conducting due diligence and other functions specified in the BSA and its implementing regulations.

Disciplinary Information

Ms. Pina has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Ms. Pina or of Sabadell.

Other Business Activities

Ms. Pina is Vice President; Senior Compliance Officer at Banco de Sabadell S.A.-Miami Branch.

Additional Compensation

Ms. Pina does not receive economic benefits from any person or entity other than Sabadell and the Branch in connection with the provision of investment advice to clients.

Supervision

Ms. Pina is supervised by Sabadell's CEO, Mr. Gustavo Cano. Any of these individuals can be reached directly by calling the telephone number on the cover of this brochure supplement.

Alexander Rodriguez, Financial and Operations Principal

Educational Background and Business Experience

Mr. Rodriguez holds a Bachelor of Business Administration from Florida International University and FINRA Series 7 and 27.

Since 1997, Mr. Rodriguez has accumulated professional experiences in the Financial and Operations areas of introducing securities firms in Florida and New York.

He has served as Chief Financial Officer/FinOP for Puma Capital, LLC the Miami and New York offices; Global Investor Services, LLC of Miami, Florida; Hencorp Becstone, LC of Miami, Florida. He has also held positions of Controller for Alpha Capital Family of Funds and as Assistant Controller for Hencorp Becstone, LC, both located in Miami, Florida.

Disciplinary Information

Mr. Rodriguez has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Ms. Pina or of Sabadell.

Other Business Activities

Mr. Rodriguez is Vice President; Senior Compliance Officer at Banco de Sabadell S.A., Miami Branch.

Additional Compensation

Mr. Rodriguez is an independent contractor. He receives economic benefits from Sabadell in connection with his services to Sabadell.

Supervision

Mr. Rodriguez is supervised by Sabadell's CEO, Mr. Gustavo Cano. Any of these individuals can be reached directly by calling the telephone number on the cover of this brochure supplement.