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BUSINESS CARD POLICY

(and Stationery)

Regulators have defined information that you must put on your business card. It is now dependent on the location at which you perform securities business. Using a combination of Rule 2010 governing advertising and Rule 3010's branch office definition as "net result" for formulating what is permissible to be on business cards has been put forth in Notice to Members

Consequently, you must correctly determine which situation applies to you and prepare the content of your business card based on your situation. The entire content of the card **MUST ALWAYS** be submitted to the home office for the Chief Compliance Officer's approval. It is required that you use your First Asset e-mail address if you use any e-mail address. You are **NOT** permitted to use any other e-mail address (even on a two sided card using your DBA). **You are required, however, to use First Asset's web page address on your card.** It is WWW.FIRSTASSETFINANCIAL.COM (or www.firstassetfinancial.com).

You should update your cards to reflect this change and the change of name of the SRO (Self-Regulatory Organization) from NASD to FINRA. This is a required change by FINRA (formerly NASD) before the end of the year. We also offer a free logo that merely says "Member SIPC" and does not refer to FINRA.

✓ If you work from a registered branch office you may use the address of the branch office, phone number of that branch office. You may also use your cell phone number (identified as "cell") or home phone (identified as "home") as long as the branch office number appears on the card (identified as "office"). You may **NOT** use your residence address or a mailing address other than the branch office's mailing address. You must place on the card: "check firstassetfinancial.com for more information" on your branch or OSJ card. FINRA wants a way for the customer to contact the home office in case they want to lodge a complaint. In lieu of this method of contact, you may include the home office's address and phone on the OSJ/branch card.

✓ If you work from your residence (and you do not register it as a branch), you may **NOT** use your residence address or mailing address, but must use, instead, the address of the branch/OSJ supervising you. You may use your home phone and/or cell phone on your business card as long as the branch/OSJ phone number/address appears on the card and are identified as such.

✓ If you work from an office location used primarily for a purpose other than securities sales (for example an insurance office, CPA office, etc. and you do not register it as a branch), you may use an exemption to Rule 3010 if you effect no more than 25 transactions per year. It is YOUR responsibility to keep track of the number of transaction each calendar year by maintaining a log or blotter with the number of transaction on it. If, in a calendar year, you exceed the 25 transaction, you MUST register as a branch through FINRA (formerly NASD). You may place your address & phone number of the office as long as the branch/OSJ that supervises you is also on the card.

For situations other than those above, contact the FAF compliance officer to determine what can be placed on your business card/stationery.

Regarding DBA's used by FAF representatives: It appears to be permissible to put your DBA information on one side of a card and your FAF information on the other side of a business card. This is the preferred format, and if used on a two sided card or you choose to attempt to use both your "DBA and First Asset Financial Inc." on the *same letterhead* also, you must use the following phrase in the communication in letters similar in size to your "DBA" name to read:

Only securities are offered through First Asset Financial Inc. (FAF). All other services/products are offered by (your DBA), which is not affiliated with FAF & is solely responsible for the products/services offered.

If you use the "2 sided" business card, this phrase should appear on the **First Asset side** of the card and may be in smaller letters at the bottom of the card.

It is NOT permissible (as was previously) to use the DBA and First Asset together, unless you are registered as a branch office. A conflict arises when you use all of your DBA information and then place something to the effect "Securities Offered through First Asset Financial Inc." as then, under FINRA/NASD definition, you would be "holding the location out as a place to do securities business."

Regulator Publication Regarding Business Cards (Sales Literature)

The following is an excerpt from an NASD publication, which gets very specific about the use of "DBAs" and business cards giving both background and conclusions:

Article III, Section 35 of the NASD Rules of Fair Practice governs members' communications with the public. Among the standards set forth in the rules are requirements that all advertising and sales literature contain the name of the NASD member and that no material fact be omitted if the omission would cause the communication to be misleading.

In recent years, non-member entities, such as financial planners, insurance companies, banks, and thrift institutions, have increasingly become involved in the securities field. As a consequence, the names of both NASD member firms and non-member entities often appear in a single advertisement or item of sales literature. Sometimes, advertising

and sales literature that have included the names of both member and non-member entities have done so in ways that made it difficult for the public to identify which entity was actually offering securities. Similar problems have arisen when an individual who is affiliated with member and non-member entities is named in public communications, but the nature of the individual's relationships with named member and nonmember entities is left unclear.

A related problem that has also developed during recent years stems from some members' use in advertising and other public communications of fictitious names or variations upon member names. Once again, this practice can make it difficult for the public to identify the NASD member with which it is dealing.

GENERAL STANDARDS

To address these problem areas, the proposed amendment sets forth general standards that would apply to any business card, letterhead, or other communication used in the promotion of a member's securities business. ...that when multiple entities are named in one communication, the nature of the relationships among the named entities and the products offered by each entity be made clear; that when an individual and multiple entities are named in one communication, the nature of the individual's relationship with each entity be clearly identified. The proposed general standards would also prohibit individuals from including in communications references to non-existent degrees or designations, or the use of *bona fide* degrees or designations in a misleading manner...

...(g) Standards Applicable to the Use and Disclosure of the NASD Member's Name

In addition to the provisions of subsection (. of this Section, members' public communications shall conform to the following provisions concerning the use and disclosure of the member's name:

(1) General Standards

- (A) Any business card, letterhead or other communication used in the promotion of a member's securities business must clearly and prominently set forth the name of the NASD member.
- (B) The name of the NASD member firm shall be in type size at least as prominent as that used for any other entity named in the communication.
- (C) If more than one entity is named in the communication, any relationship among the entities shall be clear. However, if there is not a direct relationship, the communication shall not imply that there is one.
- (D) If an individual is named in the communication, the nature of the affiliation or relationship of the individual with each entity shall be made clear.
- (E) Individuals shall not create or award to themselves non-existent degrees or designations or use *bona fide* designations in a misleading manner.
- (F) If products or services are offered by companies identified in the communication, there shall be no confusion as to which entity is offering which products and/or services. Securities products and services shall be clearly identified as being offered by the registered broker/dealer.
- (G) If the communication identifies a single company, the communication shall not be used in a manner which implies the offering of a product or service not available from the company named (e.g., an insurance agency business card should not accompany an offer of securities). (FAF note: It is permissible to use a two sided card)

(H) The positioning of disclosures can create confusion even if the disclosures or references are entirely accurate. To avoid confusion, a reference to an affiliation (e.g., registered representative), shall not be placed in proximity to the wrong entity.

(I) Any references to memberships, (e.g., NASD, SIPC, etc.) shall be clearly identified as belonging to the entity that is the actual member of the organization.

If you choose to attempt to use both your “DBA and First Asset Financial Inc.” on the same business card or letterhead, you must use the following phrase in the communication in letters similar in size to your “DBA” name to read:

Only securities are offered through First Asset Financial Inc. (FAF). All other services/products are offered by (your DBA), which is not affiliated with FAF & is solely responsible for the products/services offered.

Use of Certifications and Designations

In keeping with recently adopted regulations by several states governing the use of certifications and designations by registered representatives and investment advisor representatives, First Asset has determined to parallel these principals.

Due to concern that certifications or designations that specifically target seniors or imply a specialized expertise in the financial needs of seniors, FAF will not allow use of the following designation on any business cards, stationery, or other communications:

- Certified Senior Advisor (CSA)
- Certified Financial Gerontologist (CFG)
- Chartered Senior Financial Planner (CSFP)
- Certified Elder Planning Specialist (SEPS)
- Retirement Income Specialist (RIS)

Regulators continually raise concerns about the use of designations and the potential for misleading clients and prospective clients by using designations which lack educational substance and may be primarily used for marketing purposes. Although there are legitimate organizations whose members must complete rigorous programs of study, pass comprehensive examinations, and have practical experience in order to receive their designations, regulators note a number of entities formed in the last few years have created designations with less stringent requirements. First Asset will not allow the above designations to be used on two-sided cards, stationery, or advertisement that discloses First Asset’s name. For your outside business activity, it may be questionable whether we are able to enforce not using these designations, but they are none-the-less prohibited there as well for the same reasons herein outlined.

First Asset will allow designations that are factual and can be documented on your First Asset business card other than those listed above. Simply submit

the designations with your business card content and a determination will be made by the CCO of First Asset.

The above being said, your “title” is at your discretion, except the use of “senior,” “retirement and “investment advisor” in your title is not allowed. We have no “set” title that is preferred and it appears not to be regulated (although we “like” Financial Advisor, as it is similar to the first two letters of the firm name when abbreviated “FA”). You may use the following terms; Registered Representative, Financial Advisor, Investment Representative, Investment Counselor, Financial Counselor, Financial Consultant, Stock Broker, Discount Broker, Branch Manager (if you are), or you may place nothing below your name as a title. As with all other parts of your business card, the data must be approved prior to use (and preferably-prior to being printed!). Below are samples of business cards. The home office has a logo that they will share with at no charge if you request it.

OSJ office location card:

John Doe
Financial Advisor

Investments · Stocks
Mutual Funds
Retirement Planning · IRAs



FIRST ASSET FINANCIAL Inc.
 Member SIPC ♦ FINRA

123 Easy St.
 Salina, KS 67401
www.FirstAssetFinancial.com

Where is this the OSJ address & phone →
 Web address required to be On An OSJ or Branch Card ←

785-827-4444 Office
785-787-5054 Cell
785-823-9207 FAX
 E-Mail me at
JohnD@firstassetfinancial.com

For a person working from their home not registered as a branch, they may use the following on their card:

Cecil Hart
Financial Advisor

Investments · Mutual Funds
Variable Annuities · IRAs



FIRST ASSET FINANCIAL Inc.
 Member SIPC ♦ FINRA

700 Gold Brick (where this is the OSJ address)
Dodge City, KS 67401
(785) 825-5050 (where this is the OSJ phone)

785-827-4544 home
785-887-5974 Cell
CecilH@firstassetfinancial.com
www.firstassetfinancial.com

For a person working from an office used primarily for non-securities business and performs less than 25 transactions per year:

Connie Helpful
Financial Advisor

Investments
Mutual Funds IRAs



Logo is optional

123 Easy St. (Home Office)
Salina, KS 67401
(785) 825-5050
www.firstassetfinancial.com

785-827-5540 local Office
785-785-5054 Cell
1212 Cadillac Blvd.
Tree City, IA 77422
ConnieH@firstassetfinancial.com

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Connie Helpful
Financial Advisor



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