

**Transaction Fees to be assessed for the following Non-Blottered Transactions**  
Variable Annuities, Variable Life Products, Equity Indexed Annuities, Direct Participation  
Programs,  
1031 Tenant-In Common Programs, REITs

Effective **September 1, 2009**, if transactions in any of the above products have not been blottered by the time payment is made to the Firm, the Supervision department will use details from the commission report to blotter the transaction on behalf of the FA via Direct Order Entry in **VISION2020** and assess a transaction fee for each entry. The Blotter Fee Schedule & Escalation Process is outlined below.

In the event that a Non-Brokerage account has not been established in the system for the client, the FA and FLS will be notified that a Non-Brokerage account must be established within 48 hours and the FA will be responsible for blottering the transaction.

**Blotter Fee Schedule & Escalation Process**

1<sup>st</sup> violation Notification Warning indicating that the next violation is subject to a transaction fee.

No transaction fee will be assessed.

2-10 violations (cumulative for all products requiring manual blottering: DPPs, REITs, VLs, VAs, EIAs, and 1031s)

**\$20/per transaction**

11-20 violations (cumulative for all products requiring manual blottering: DPPs, REITs, VLs, VAs, EIAs, and 1031s)

**\$30/ per transaction**

21+ violations (cumulative for all products requiring manual blottering: DPPs, REITs, VLs, VAs, EIAs, and 1031s)

**\$30 and referral** to Executive Review Committee for review to determine disciplinary action

*Willamette will continue to assist you with this by sending reminder emails as we become aware of any transactions that need to be blottered, but it is ultimately your responsibility.*