



(FFIEC)
**Federal Financial
Institution Examination Council
Supervisory Policy**

Revised October, 2024

Dear Client:

To assist you in meeting the supervisory policy requirements of the five national regulatory bodies comprising the Federal Financial Institution Examination Council regarding the selection of securities dealers, we have provided the following information in accordance with the supervisory agencies' specifications:

- Background Summary – Duties and Responsibilities
- Compliance – Qualifications and Requirements of a Broker/Dealer
- Annual Statement of Financial Condition
- References
- Regulatory and Clearing Agencies
- Regulatory Disciplinary Action Disclosure
- Biographies of The Baker Group's Managing Directors
- Officers, Account Executives, and Traders

Please do not hesitate to call our toll-free number 1-800-937-2257 if you have any questions or require further information.

Sincerely,

The Baker Group LP

Background Summary Duties and Responsibilities

The Baker Group LP is a successor firm to James Baker & Company founded in 1979. The Baker Group LP is registered with the Securities & Exchange Commission as a general securities broker/dealer and is a member of the Financial Industry Regulatory Authority, the Securities Investment Protection Corporation, the Municipal Securities Rulemaking Board, and the Securities Information Center.

The Baker Group LP has been providing quality investment services to community banks nationwide since 1979. The firm is a leader in the development of innovative software and management reporting services for community banks. As an independently owned investment firm, The Baker Group specializes in products and programs to address emerging needs in the areas of:

- Portfolio Management
 - Broker/Dealer Services
- Software Solutions*
 - BBA: Baker Bond Accounting®
 - APM®: Advanced Portfolio Monitor
 - IRRM®: Interest Rate Risk Monitor
 - BSM®: Balance Sheet Monitor
- Financial Strategies Group
 - Strategic Planning
 - Regulatory Compliance and Policy Education
 - Investment Seminars
 - Quarterly Investment Strategies
 - Updated Investment and Asset/Liability Policies
 - Regular Online Educational Sessions

Since the early 1980's, The Baker Group LP has taken a leadership position in presenting investment management seminars. Regularly scheduled seminars are conducted to keep bank clients abreast of current market conditions, changing bank regulations, prudent security analysis and the introduction of new investment vehicles. Our staff has addressed numerous national and state banking associations and served on the faculty of various community banking schools.

The Baker Group LP

1. Executes, clears, and settles securities transactions for clients;
2. Prepares and transmits confirmations of executed transactions to clients;
3. Prepares and sends monthly security and position statements to clients, as required;
4. Maintains the financial books and records required by law and by sound business practice

* The Baker Group LP is the sole authorized distributor for the products and services developed and provided by The Baker Group Software Solutions, Inc.

Compliance

Qualifications and Requirements of a Broker/Dealer

Membership & Registration

Financial Industry Regulatory Authority (FINRA) The Securities and Exchange Commission (SEC)

The Baker Group LP is a broker/dealer and member of the Financial Industry Regulatory Authority, otherwise known as FINRA. FINRA regulates trading in equities, corporate bonds, securities futures, and options markets. All firms dealing in securities are required to be a FINRA member firm. FINRA by-laws dictate that each member, in the conduct of its business, must observe high standards of commercial conduct and just and equitable principles of trades. All FINRA members are obligated to subscribe to the same standards of ethical conduct by demonstrating compliance with these by-laws.

Additionally, as a FINRA member, the firm is required to both maintain registration with and adhere to the applicable rules and regulations of the Securities and Exchange Commission (SEC).

Securities Investor Protection Corporation (SIPC)

Certain broker/dealers are also subject to federal statutory provisions requiring them to become members of the Securities Investor Protection Corporation (SIPC). All non-bank broker/dealers registered with the SEC whose principal business is conducted within the United States or its territories must become members of the SIPC. All firms that are required to become members of SIPC must carry a blanket fidelity bond that meets the requirements as to form, amount and type of coverage specified.

Municipal Securities Rulemaking Board (MSRB)

All broker/dealers engaging in the offer and/or sale of municipal securities are obliged to comply with the rules and regulations of the Municipal Securities Rulemaking Board (MSRB).

State Regulatory Authorities

All broker/dealer firms are generally subject to the requirements of the securities laws and registration requirements of each state in which it conducts securities related business activities.

Securities Information Center (SIC)

FINRA member firms, with few exceptions, are required to register as direct or indirect inquirers in the Securities Information Center's Lost & Stolen Securities Program.

Regulatory Examinations

FINRA and SEC representatives have the statutory authority to conduct, at any time or from time to time, both periodic and special examinations of the activities and books and records of the broker/dealer registrant. The examination staff will seek to determine whether the broker/dealer is conducting its activities in accordance with the federal securities laws, and the rules adopted under those laws, as well as implementing supervisory systems and/or compliance policies and procedures that are reasonably designed to ensure that the broker/dealer's operations are in compliance with the applicable legal requirements.

Net Capital Requirements

The broker/dealer is subject to the SEC's Uniform Capital Rule (Rule 15c3-1) which requires that it maintain a minimum amount of net capital to continue operation.

Written Supervisory Procedures

Article III, Section 27 of the FINRA Rules of Fair Practice requires a firm to establish, maintain, and enforce written procedures that will enable it to properly supervise its employees' activities and to assure compliance with all applicable securities law, rules, and regulations, and the FINRA rules to which it is subject.

Personnel Requirements

FINRA prescribes two levels of qualifications and registration for broker/dealer personnel:

1. Registered representatives, generally sales personnel.
2. Principals, generally officers of the firm and other management personnel involved in the day-to-day operations of the broker/dealer's public finance or securities business. FINRA prescribes certain qualification requirements for members' senior management personnel.

Various personnel must demonstrate the competency to certain functions of the broker/dealer's business operations by passing certain qualifications tests. FINRA does not require registration of personnel performing certain support functions. The firm must comply with the continuing education program prescribed by for securities dealers by FINRA.

Financial Reporting

Broker/dealer firms are required to properly prepare and maintain certain books and records pursuant to SEC Rule 17a-3 and 17a-4 for the type of securities business conducted.

Broker/dealer firms are required to have their books and records examined annually by a Public Company Accounting Oversight Board (PCAOB) accounting firm. Each broker/dealer is required to file the annual audited financial statements, as well as monthly and /or quarterly financial information, with the regulatory authorities on a timely basis.

Financial Statements

To view our most recent financial statements please visit our website:

<https://www.gobaker.com/about-baker/financials-disclosures/>

REFERENCES

References are available upon request.

Please call: 1.800.937.2257

Regulatory Agencies

Ms. Danielle Dan
Principal Regulatory Coordinator
Financial Industry Regulatory Authority, Risk Oversight & Operational Regulations
200 Liberty Street, 9th Floor
New York, NY 10281

For Inquiries call:
(646) 315-8523

Clearing Agencies

John Vinci
Managing Director
The Bank of New York Mellon
One Wall Street 41st Floor
New York, New York 10286

Mr. Dean Schneider
Legal Compliance
Pershing LLC – Director Brokerage Services
One Pershing Place, Ninth Floor
Jersey City, New Jersey 07399

Regulatory Disciplinary Action Disclosure

FINRA Member Firm:
The Baker Group LP
Broker/Dealer Number: 007888

Disciplinary Actions

The Baker Group LP – Broker/Dealer

Details available at:

<http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/>

The Baker Group LP – Investment Advisor

None

Board of Directors

For a complete listing of our Board of Directors, their biographies, and contact information, please visit our website:

<https://www.gobaker.com/about-baker/board-of-directors/>

The Baker Group LP

Office Locations

MAIN OFFICE

1601 Northwest Expressway, Suite 2000
Oklahoma City, Oklahoma 73118
405.415.7200
1.800.937.2257

6500 River Place Drive
Building 4, Suite 101
Austin, Texas 78730
1.888.480.0301

2975 West Executive Parkway, Suite 139
Lehi, Utah 84043
801.990.1701
1.800.288.9411

901 Community Drive
Springfield, Illinois 62703
217.241.0835
1.888.333.7704

375 Deer Park Ave., 1st Floor
Babylon, NY 11702
1.800.937.2224

Officers, Account Executives, and Traders

Carl Huxley	Chief Executive Officer
Ryan Hayhurst	President
Brian Affolder	Managing Director
Mark Baumann	Managing Director
John Bloss	Managing Director
Taylor Currie	Managing Director
Gerry Hart	Managing Director
Ronald Hill	Managing Director
Jantz Kinzer	Managing Director
Jeff Oakes	Managing Director
Kathryn Phillips	Managing Director, CFO & COO
Phil Stenseth, CFA	Chairman
Raymond Amereno	Fixed Income Trader
Charles Amis	Associate Partner and Account Executive
Jason Bader	Vice President and Account Executive
Brian Bates	Associate Partner and Account Executive
Tim Beloit	Associate Partner and Account Executive
Nelson Burnett	Financial Analyst
Tim Civick	Operations Associate
J. Paul Clanton	Vice President and Account Executive
Frank Coffey	Account Executive
Logan Cox	Fixed Income Trader
Chris Dahlgren	Senior Financial Strategist
Kayla Diemer	Vice President
Chris Dykstra	Vice President and Account Executive
Eric Fischer	Associate Partner and Senior Trader
Adam Goodrich	Associate Partner and Senior Trader
Rick Hansing	Senior Partner
Todd Hardberger	Vice President and Account Executive
Eric Harland	Senior Partner
Buck Held	Associate Partner and Account Executive
Carl Holliday	Senior Partner
Rachel Howell	Financial Analyst
Bobby Huffman	Account Executive
Mike Johnston	Associate Partner and Account Executive
Ken Judd	Associate Partner and Account Executive
Maureen Kelley	Account Executive
Justin Kinzer	Vice President and Account Executive
Joseph LeMay	Account Executive
Ceth Loomis	Vice President and Account Executive
Mike Mackey	Senior Partner
Connor G. McGinnis	Account Executive
Jeffrey McQueen	Associate Partner and Account Executive
Todd Mettenbrink	Associate Partner and Senior Trader
Luke Mikles	Vice President, Financial Analyst
Roy Moore	Associate Partner and Account Executive
Randy Nelson	Director of Public Finance
Andrew Okolski	Associate Partner Director of Credit Union and Municipality Strategies
John Parker II	Associate Partner and Account Executive
Deon Perryman	Associate Partner and Account Executive
Griffin Pierce	Vice President, Financial Analyst
Dan Pilcher	Associate Partner and Senior Trader
Andrea Pringle	Financial Analyst
Dale Sheller	Associate Partner and Senior Vice President
Gerry Skousen	Associate Partner and Account Executive
Kayli Smith	Vice President and Fixed Income Trader
Dana Sparkman	Senior Vice President

Matt Stefurak
Wayne Story
Julie Szabolsci
Stephen Terrell
Dan Tonseth
Mat Turner
Gregory Tomaszewicz
Jeff Varner
Jason Vlcek
Nick Ward
Brenda Weaver
Travis White
Chris Wilson

Cody Wilson
Kathryn Williams
Dee Wint
Dillon Wiedemann
Tom Woods
Misty Wrinkle

Vice President Account Executive
Associate Partner and Account Executive
Vice President and Financial Analyst
Associate Partner and Account Executive
Senior Partner
Vice President
Associate Partner and Senior Financial Strategist
Senior Loan Trader
Associate Partner and Account Executive
Account Executive
Vice President
Account Executive
Associate Partner, Sr Vice President, Director of
Portfolio Systems & Services
Account Executive
Trading Associate
Associate Partner and Account Executive
Vice President and Financial Analyst
Associate Partner
Chief Compliance Officer

Traders

Raymond Amereno
Logan Cox
Eric Fischer
Adam Goodrich
Todd M. Mettenbrink
Dan Pilcher
Kayli Smith
Philip C. Stenseth
James C. Virgona

Education/Speaking

Chris Dahlgren
Ryan Hayhurst
Skoshi Heron
Luke Mikles
Andrew Okolski
Andrea Pringle
Dale Sheller
Dana Sparkman
Greg Tomaszewicz
Dillon Wiedemann
Chris Wilson