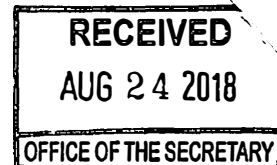


**BEFORE THE
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C.**



In the Matter of the Application
of Timothy Charles Sullivan
For Review of Action Taken By
FINRA
File No. 3-18616

**APPLICANT’S RESPONSE TO FINRA’S MOTION TO DISMISS THE APPLICATION
FOR REVIEW AND TO STAY THE BRIEFING SCHEDULE**

I. INTROUDUCTION

On Friday, August 17, 2018, FINRA’s Office of the General Counsel submitted a Motion to Dismiss the Application for Review and to Stay the Briefing Schedule via certified, overnight mail. Counsel for the Applicant, Timothy Charles Sullivan (“Sullivan”), received a copy of this Motion on Monday, August 20, 2018. FINRA states that Sullivan’s Application for Review should be dismissed because “it is untimely.” Specifically, FINRA asserts that Sullivan filed his Application for Review “almost two months after he was notified that his request for expungement of a customer arbitration from his record in the Central Registration Depository (“CRD®”) was not eligible for arbitration.” FINRA also asserts that Sullivan has not “made the required showing of ‘extraordinary circumstances’ sufficient to justify an extension of his time to file.” However, Sullivan did in fact file his Application for Review within the 30-day time-frame allotted, and thus had no need to show

“extraordinary circumstances” sufficient to justify an extension of his time to file, as he had no need to seek such an extension. Consequently, the Commission should deny FINRA’s Motion to Dismiss the Application for Review and to Stay the Briefing Schedule.

II. FACTUAL BACKGROUND

On April 6, 2018, Sullivan filed a Statement of Claim with FINRA’s Office of Dispute Resolution (“Dispute Resolution”), naming his former firms, Alamo Capital (“Alamo”) and FSC Securities Corporation (“FSC”) as Respondents, seeking expungement of three disclosures from his CRD Record and BrokerCheck. *See Exhibit 1.* On May 24, 2018, Alamo filed its Statement of Answer. *See Exhibit 2.* On May 29, 2018 FSC, filed its Statement of Answer. *See Exhibit 3.*

On May 31, 2018, Dispute Resolution issued a notice to Sullivan stating that his request for expungement for one of the disclosures “which arises from a prior adverse Award” was “not eligible for arbitration.” *See Exhibit 4.* Sullivan was advised that forum would be granted for the other two disclosures.

On June 29, 2018, Sullivan sent an original, plus 3 copies, of his Application for Review to Dispute Resolution’s Chicago office via certified, overnight mail. *See Exhibit 5.* On that same day, Sullivan sent an original, plus 3 copies, of his Application for Review to the Commission via certified, overnight mail. *See Exhibit 5.* According to FINRA’s Motion to Dismiss, the Office of General Counsel somehow received a copy of the Application for Review on June 18, 2018.

On July 23, 2018 counsel for Sullivan received notice from the Commission that they had received the Application for Review from FINRA. Counsel for Sullivan explained that it had served both FINRA and the Commission contemporaneously, as required by

Commission Rule of Practice 420. 17 C.F.R. § 201.420(b). It was conveyed to counsel for Sullivan via telephone that the copies sent to the Commission must have been sent to a different address than what is used for service of process and that the Application for Review may be in the wrong location within the office. The Commission requested a copy be faxed to one of two fax numbers. After several failed attempts to fax the requested copies, counsel for Sullivan mailed another copy via certified, priority mail. *See Exhibit 6*. Counsel for Sullivan sent the Application for Review to the same address as it had used previously after confirming that it was, in fact, the proper address. For reasons unknown, only the second attempt to mail the Application for Review to the Commission was successful despite the use of certified mail on both attempts.

On July 30, 2018, the Commission issued a letter acknowledging that it had received Sullivan's Application for Review on July 27, 2018. However, the Commission made no mention that the filing was untimely.

III. ARGUMENT

The Commission should deny FINRA's Motion to Dismiss the Application for Review and to Stay the Briefing Schedule because FINRA's assertion of and argument that the Application is untimely is both false and brought in bad faith. Further, the argument that Sullivan "has made no attempt to establish 'extraordinary circumstances' sufficient to justify an extension of his time to submit an application for review" is an irrelevant argument. Sullivan did not seek an extension of his time to file as he filed his Application for Review within 30 days of receiving notice from Dispute Resolution that his request for expungement for one disclosure was not eligible for arbitration. As such, he made no argument to establish "extraordinary circumstances."

According to Comment (b) of Commission Rule of Practice 420, “a method of service that provides proof of delivery is not mandatory,” but the applicant for review bears the burden of proving that a filing was made in a timely manner when such a fact comes into question. While there is no identifiable reason as to why the Commission did not receive the Application for Review when it was first sent via certified, overnight mail on June 29, 2018, Sullivan has met his burden of proof in establishing that his Application for Review was filed within the 30-day time limit pursuant to Commission Rules of Practice 420 and 151. 17 C.F.R. §§ 202.420; 202.151. *See Exhibits 5, 6.*

In the event that the Commission did make a determination that Sullivan’s Application for Review was untimely because it was not received by the Commission within the 30-day time limit, Sullivan would then vehemently argue that he has experienced “extraordinary circumstances” which warrant an extension; as he made a best faith effort to file his Application for Review within the 30-day time limit by sending the required original plus 3 copies and Certificates of Service to both FINRA and the Commission via certified, overnight mail on June 29, 2018, one day before his deadline. It is unknown why the Application was received by FINRA, but not the Commission.

The Commission has held that “extraordinary circumstances” may arise when “the failure to timely file was beyond the control of the applicant.” *PennMont*, 2010 WL 1638720, at *4. The failure of Sullivan’s best faith efforts to serve both FINRA and the Commission via certified, overnight mail is an extraordinary circumstance beyond his control. Sullivan must not be held responsible for whatever extraordinary circumstances caused a well-established and usually extremely reliable process of service to fail.

The power and authority granted to the Commission is plenary. FINRA's motion to dismiss as untimely is a misguided attempt to persuade the Commission to overlook the principles of justice in their entirety. As outlined herein, the sole basis of FINRA's motion is not only littered with assumptions, but unequivocally excepted pursuant to *PennMont*.

IV. CONCLUSION

Sullivan filed his Application for Review within the 30-day time limit that is established by Commission Rule of Practice 420. While that fact has come into question, Sullivan has met his burden of proof with receipts of certified, overnight mail sent to both FINRA and the Commission, dated June 29, 2018. Because Sullivan did not file untimely, there is no requirement for him to show "extraordinary circumstances" that warrant an extension. However, should the Commission determine the showing of such a requirement, Sullivan has met that burden as well. Consequently, the Commission should deny FINRA's Motion to Dismiss the Application for Review and to Stay the Briefing Schedule.

Respectfully submitted,



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Attorney

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Broomfield, CO 80020

Date: August 23, 2018

Exhibit 1 – Timothy Charles Sullivan, Statement of Claim and Exhibits, dated April 6, 2018.

Exhibit 2 – Alamo Capital Investment Services Answer to Statement of Claim, dated May 24, 2018.

Exhibit 3 – FSC Securities Corporation Statement of Answer, dated May 29, 2018.

Exhibit 4 – FINRA Notice titled ‘Forum Was Denied Without Prejudice,’ dated May 31, 2018.

Exhibit 5 – Copy of Receipts for Certified, Overnight Mail, dated June 29, 2018.

Exhibit 6 – Copy of Receipt of Certified, Priority Mail, dated July 27, 2018.

EXHIBIT 1

FINANCIAL INDUSTRY REGULATION AUTHORITY DISPUTE RESOLUTION	
In the Matter of the Arbitration Between: Claimant: Timothy Charles Sullivan v. Respondents: Alamo Capital and FSC Securities Corporation	
STATEMENT OF CLAIM	

CASE NO. _____

As his Statement of Claim, Mr. Timothy C. Sullivan (the “Claimant”), by the undersigned attorney, hereby requests arbitration with a telephonic expungement hearing before FINRA Dispute Resolution regarding the following allegations against Alamo Capital (“Alamo”) and FSC Securities Corporation (“FSC”) (together, the “Respondents”) pursuant to customer dispute occurrence numbers: 765540, 693544, and 1067267 (together, the “Occurrences”):

THE PARTIES

1. The Claimant, Timothy Sullivan (CRD #2969989), is a resident of Danville, California. He has been working in securities since December of 1997 and is an investment advisor with International Assets Investment Management, LLC in San Ramon, California and is not currently registered with FINRA. (*see*, Exhibit 1)

2. The respondent, Alamo Capital (CRD #26193) (f/k/a Alamo Capital Investments), is a securities broker-dealer, investment adviser firm, and FINRA member firm with its corporate headquarters in Walnut Creek, California. Between December of 1997 and January of 2000,

Alamo employed the Claimant as Vice President and a registered representative in Walnut Creek, California. (*see*, Exhibit 1)

3. The respondent, FSC Securities Corporation (CRD #7461), is a securities broker-dealer, investment adviser firm, and FINRA member firm with its corporate headquarters in Atlanta, Georgia. Between January of 2000 and July of 2006, FSC employed the Claimant as a registered representative in Walnut Creek, California. (*see*, Exhibit 1)

FACTUAL BACKGROUND

4. Each customer dispute is summarized below in chronological order by the date of the customer's initial complaint.

5. The information herein is to the best of the Claimant's recollection in the absence of substantiating documentation.

Occurrence Number 765540

6. In 1999, Mr. Daniel Sienes ("Sienes") became a client of the Claimant at Alamo after he attended a financial seminar. Sienes was looking for ways to produce income.

7. Sienes was 72 years old and retired. He had more than 30 years of experience as an investor. Sienes had an annual income of approximately [REDACTED] and a liquid net worth of approximately [REDACTED]. Based on conversations with Sienes and a questionnaire on the New Account Form completed by Sienes, the Claimant and Sienes ascertained Sienes's investment objectives to be income followed by growth and his risk tolerance to be moderate. Sienes needed some income from his investments. His investment time horizon was more than ten years.

8. Subsequently, Sienes opened at least two Individual Retirement Accounts ("IRAs") at Alamo (the "Sienes Portfolio").

9. In or around 1999, based on Sienes's investment objective of income, the Claimant recommended several investment products, including a variable annuity from the GE Life and

Annuity Company (the “GE Annuity”). The Claimant explained in detail the terms, risks, fees, advantages, and disadvantages of the GE Annuity to Sienes.

10. Sienes wanted to take the Required Minimum Distribution (“RMD”) from the Sienes IRA. The Claimant verified with GE Life and Annuity Company to ensure that there would be no penalty for taking an RMD out of the Sienes IRA, even if it exceeded the free surrender amount.

11. In late 1999, following several conversations with the Claimant, Sienes purchased the GE Annuity in one of his IRA accounts (the “Sienes IRA”). Sienes’s investment in the GE Annuity represented approximately 20% of his investable assets.

12. The Claimant spoke with Sienes at least twice over the next few months, and there was no further trading in Sienes’s account.

13. In January of 2000, the Claimant left Alamo Capital. (*see*, Exhibit 1) Sienes remained at Alamo.

14. In early January of 2000, Sienes called Alamo, asking to take his RMD for the calendar year. Sienes wanted to take the RMD from the GE Annuity for his entire portfolio, which consisted of separate IRAs. Alamo explained to Sienes that, while he was allowed to take his RMD on the Sienes IRA based on its value only, he could not combine all of his RMDs on other accounts and withdraw only from the Sienes IRA.

15. Sienes did not speak with the Claimant about filing a complaint.

16. On January 10, 2000, Sienes sent a letter to Alamo, alleging that “he could not withdraw [the] mandatory IRA [distribution] from [the GE Annuity],” and that the Claimant “used misleading proactices [*sic*].” (*see*, Exhibit 1)

17. In February of 2000, Alamo reversed Sienes’s contract for the GE Annuity, effectively eliminating the source of Sienes’s complaint. (*see*, Exhibit 1)

18. In or around 2010, this customer dispute appeared on the Claimant's CRD record as "Pending." The Claimant was unaware as to why the dispute, which he understood to be closed, suddenly appeared on his CRD record.

19. This customer dispute is currently listed on the Claimant's CRD record as "Pending." (*see*, Exhibit 1)

20. Sienes did not pursue his claim in arbitration or court. (*see*, Exhibit 1)

21. Sienes's claims that "he could not withdraw [the] mandatory IRA [distribution] from [the GE Annuity]," and that the Claimant "used misleading practices [*sic*]" are clearly erroneous, factually impossible, and false and, therefore, meet both the FINRA Rule 2080(b)(1)(A) standard and the Rule 2080(b)(1)(C) standard for expungement. (*see*, Exhibit 1)

22. Since Sienes could withdraw the mandatory IRA distribution from the GE Annuity, and since the Claimant committed no misrepresentation, did not engage in any misleading practices, made a suitable recommendation, and performed his duties as a representative in a thorough, ethical, and professional manner, the public disclosure of the patently false allegations herein does not offer any public protection and has no regulatory value. If not expunged, this customer dispute will mislead any person viewing the Claimant's Central Registration Depository ("CRD") record and will not provide valuable information for knowledgeable decision making.

Occurrence Number 693544

23. In 1999, Mr. Leonardo Dominguez ("Dominguez") became a client of the Claimant after he attended a financial seminar on retirement held by Alamo. Dominguez was leaving his employment at a hospital, and he wanted to move his 403(b) plan (the "Dominguez 403(b)") to an account at Alamo.

24. A 403(b) plan, also known as a tax-sheltered annuity (TSA) plan, is a retirement plan for certain employees of public schools, employees of certain tax-exempt organizations, and certain ministers.

25. Dominguez was approximately 50 years old and was a hospital administrator. Dominguez had more than ten years of experience as an investor and an annual income of more than ██████. Based on conversations with Dominguez and a risk assessment questionnaire completed by Dominguez, the Claimant and Dominguez ascertained Dominguez's investor profile.

26. The Claimant met with Dominguez at least six times to discuss moving the Dominguez 403(b) and to determine what the deferred sales charge would be for moving the Dominguez 403(b). The Claimant and Dominguez called the administrator of the Dominguez 403(b) many times to get the specific dollar amount of the expected deferred sales charge.

27. While the Claimant discussed other investment products with Dominguez, Dominguez did not choose to purchase any investments with the Claimant.

28. In 1999, Dominguez opened an account (the "Dominguez Account"), and he transferred the Dominguez 403(b), which was worth \$207,587.67, into the Dominguez Account. (*see*, Exhibit 1) This transfer incurred a deferred sales charge of 0.4%, or \$892.59, which was consistent with what Dominguez and the Claimant had previously discussed. (*see*, Exhibit 1) Dominguez was fully aware of these penalties, and he signed all appropriate paperwork associated with the transaction, wherein Dominguez indicated that he understood the terms of the transfer of the Dominguez 403(b), including the deferred sales charge. (*see*, Exhibit 1) By transferring the Dominguez 403(b) to the Dominguez Account, Dominguez's rate of return was increased by six percent. (*see*, Exhibit 1)

29. In January of 2000, the Claimant left Alamo Capital. (*see*, Exhibit 1) Dominguez remained at Alamo. The Claimant did not speak with Dominguez again.

30. On January 20, 2000, Dominguez alleged that “he had deferred sales charges on his transferring [the Dominguez] 403(b).” Dominguez sought compensatory damages estimated to be in excess of \$5,000. (*see*, Exhibit 1)

31. In or around 2010, the dispute appeared on the Claimant’s CRD record as “Pending.” The Claimant had no idea why the dispute, which he understood to be closed, suddenly appeared on his CRD record.

32. This customer dispute is currently listed on the Claimant’s CRD record as “Pending.” (*see*, Exhibit 1)

33. Dominguez did not pursue his claim in arbitration or court. (*see*, Exhibit 1)

34. Dominguez’s claim that “he had deferred sales charges on his transferring [the Dominguez] 403(b),” as reported to the Claimant’s CRD and BrokerCheck, is clearly erroneous, factually impossible, and false and, therefore, meets both the FINRA Rule 2080(b)(1)(A) standard and the Rule 2080(b)(1)(C) standard for expungement. (*see*, Exhibit 1)

35. Since Dominguez was fully aware of all details involving the transfer of the Dominguez 403(b), including the deferred sales charge, the public disclosure of the patently false allegations herein does not offer any public protection and has no regulatory value. If not expunged, this customer dispute will mislead any person viewing the Claimant’s CRD record and will not provide valuable information for knowledgeable decision making.

Occurrence Number 1067267

36. In or around late 2000, Mr. William E. Harris (“William”) and Mrs. Antoinette Harris (“Antoinette”) (together, the “Harrises”) became clients of the Claimant at FSC after William attended a seminar hosted by FSC. William was set to retire early from his job at Quest Diagnostics Incorporated (“Quest”). William wanted to set up an IRA at FSC into which he could transfer his existing IRA. William wanted a firm to work with to manage his retirement account.

37. William was 50 years old and was a technician at Quest. He had more than ten years of experience as an investor. William had an annual income of approximately \$80,000 and a liquid net worth of \$500,000. Based on conversations with William and a risk assessment questionnaire completed by William, the Claimant and William ascertained William's investment objective to be growth and his risk tolerance to be moderate. William had no liquidity needs, and his investment time horizon was more than ten years.

38. Based on William's investor profile and objective, the Claimant discussed many investment products and strategies with William, including mutual funds. The Claimant explained in detail the terms, risks, fees, advantages, and disadvantages of his investment recommendations to William.

39. William chose to open a growth-based portfolio (the "Harris Portfolio") at FSC.

40. In or around late 2000, William chose to purchase certain mutual funds (the "Harris Funds") from among the Claimant's recommendations. William's investment in the Harris Funds represented approximately 40% of his investable assets.

41. Subsequently, the Claimant did not speak with the Harrises again, and there was no trading in the account subsequent to the purchase of the Harris Funds. The Harrises received monthly account statements, as well as updates regarding the performance of the Harris Portfolio.

42. On March 10, 2000, the NASDAQ index peaked at nearly double over the previous year. In the five years leading up to said market peak, the country had experienced rapid technological advancement and the commercialization of the internet, which had led to an enormous increase in capital growth. At the peak of the market, several leading high-tech companies, including Dell and Cisco, were downgraded due to valuation issues, which prompted investors to begin panic-selling. (*see*, Exhibit 2)

43. Within a few weeks, the stock market lost ten percent of its value. Investment capital, which had been fueling many cash-poor dotcom companies, evaporated. Dotcom companies that had achieved market capitalization in the hundreds of millions of dollars became worthless within months. By the end of 2001, more than half of all publicly traded dotcom companies folded, and trillions of dollars of investment capital was lost. (*see*, Exhibit 2)

44. Due to the collapse of the technology sector, the value of the Harris Portfolio declined.

45. On March 22, 2002, the HARRISES alleged that the Claimant “transferred funds that were in a money market fund into a stock fund without their authorization.” The HARRISES sought compensatory damages in the amount of \$151,958. (*see*, Exhibit 1)

46. Initially, FSC denied the HARRISES’ complaint.

47. On September 27, 2002, the HARRISES filed for arbitration with FINRA’s predecessor, the National Association for Securities Dealers (NASD), alleging that the Claimant “transferred funds that were in a money market fund into a stock fund without their authorization.” The HARRISES sought compensatory damages in the amount of \$151,958. (*see*, Exhibit 1)

48. On August 1, 2003, the NASD arbitration panel awarded the HARRISES \$23,927.60. The Claimant’s errors and omissions insurance contributed \$5,000 to the award amount on behalf of the Claimant. (*see*, Exhibits 1, 3)

49. The HARRISES’ claim that the Claimant “transferred funds that were in a money market fund into a stock fund without their authorization” is clearly erroneous, factually impossible, and false and, therefore, meets both the FINRA Rule 2080(b)(1)(A) standard and the Rule 2080(b)(1)(C) standard for expungement. (*see*, Exhibit 1)

50. Since the Claimant committed no transfer of funds without the HARRISES’ authorization, the public disclosure of the patently false allegations herein does not offer any public

protection and has no regulatory value. If not expunged, this customer dispute will mislead any person viewing the Claimant's CRD record and will not provide valuable information for knowledgeable decision making.

RELIEF REQUESTED

51. The Claimant requests expungement of the Occurrences from his CRD record pursuant to FINRA Rule 2080(b)(1)(A), as the claims, allegations, or information are factually impossible or clearly erroneous.

52. The Claimant requests expungement of the Occurrences from his CRD record pursuant to FINRA Rule 2080(b)(1)(C), as the claims, allegations, or information are false.

53. The Claimant requests an award of damages in the amount of \$1.00 from the Respondents.

54. The Claimant requests any and all other relief that the Arbitrator deems just and equitable.

Respectfully submitted,



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AdvisorLaw LLC
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Broomfield, CO 80020

Date: April 6, 2018

Exhibit 1 – Timothy Sullivan BrokerCheck Report, April 5, 2018 and CRD Individual Snapshot
Report, dated February 4, 2018

Exhibit 2 – “Dotcom Bubble” Investopedia article, not dated

Exhibit 3 – NASD Dispute Resolution Award in the Matter of Arbitration Between: William E.

Harris and Antoinette Harris, Claimants v. FSC Securities Corporation, Frank

Cuenca and Timothy C. Sullivan, Respondents, dated August 1, 2003

EXHIBIT 1

BrokerCheck Report
Timothy Charles Sullivan
CRD# 2969989

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Broker Qualifications	2 - 3
Registration and Employment History	4 - 5
Disclosure Events	6



About BrokerCheck®

BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.

- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

- **Where did this information come from?**

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:

- o information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
- o information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

Thank you for using FINRA BrokerCheck.



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at

brokercheck.finra.org



For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit www.finra.org.

Report Summary for this Broker



This report summary provides an overview of the broker's professional background and conduct. Additional information can be found in the detailed report.

Broker Qualifications

This broker is not currently registered.

This broker has passed:

- ✳ 1 Principal/Supervisory Exam
- ✳ 1 General Industry/Product Exam
- ✳ 2 State Securities Law Exams

Registration History

This broker was previously registered with the following securities firm(s):

SII INVESTMENTS, INC.

CRD# 2225
SAN RAMON, CA
09/2008 - 12/2017

SECURITIES SERVICE NETWORK, INC.

CRD# 13318
DANVILLE, CA
07/2006 - 09/2008

FSC SECURITIES CORPORATION

CRD# 7461
DANVILLE, CA
01/2000 - 07/2006

Disclosure Events

All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.



The following types of disclosures have been reported:

Type	Count

Investment Adviser Representative Information



Broker Qualifications



Registrations

This section provides the self-regulatory organizations (SROs) and U.S. states/territories the broker is currently registered and licensed with, the category of each license, and the date on which it became effective. This section also provides, for every brokerage firm with which the broker is currently employed, the address of each branch where the broker works.

This broker is not currently registered.



Broker Qualifications

Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below.

This individual has passed 1 principal/supervisory exam, 1 general industry/product exam, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
[Redacted]		

General Industry/Product Exams

Exam	Category	Date
[Redacted]		

State Securities Law Exams

Exam	Category	Date
[Redacted]		

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at www.finra.org/brokerqualifications/registeredrep/.

Registration and Employment History



Registration History

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
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[REDACTED]			
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Employment History

This section provides up to 10 years of an individual broker's employment history as reported by the individual broker on the most recently filed Form U4.

Please note that the broker is required to provide this information only while registered with FINRA or a national securities exchange and the information is not updated via Form U4 after the broker ceases to be registered. Therefore, an employment end date of "Present" may not reflect the broker's current employment status.

Employment Dates	Employer Name	Employer Location
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[REDACTED]		
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Other Business Activities

This section includes information, if any, as provided by the broker regarding other business activities the broker is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious or fraternal and is recognized as tax exempt.

- 1) MONARCH PRIVATE CLIENT GROUP 550 MIKADO PLACE, DANVILLE, CA 94526 - LICENSED INSURANCE AGENT PROVIDING FIXED INSURANCE PRODUCTS - PRESIDENT SINCE 2010 - APPROX 3 HRS/MO - COMMISSIONS
- 2) MONARCH ADVISORS 550 MIKADO PLACE, DANVILLE, CA 94526 - LICENSED INSURANCE AGENT PROVIDING FIXED INSURANCE PRODUCTS - OWNER SINCE 2013 - APPROX 3 HRS/MO - COMMISSIONS
- 3) TS CLASSICS & AUTOMOTIVE 2035 SAN RAMON VALLEY BLVD, SAN RAMON, CA 94583 - AUTOMOTIVE REPAIR - OWNER SINCE 8/2014 - APPROX 15 HRS/MO - NET PROFITS
- 4) NORTHERN CALIFORNIA CORVETTE ASSN P.O. BOX 6232, HAYWARD, CA 94540 - CAR CLUB - PRESIDENT
ADL000017

Registration and Employment History



Other Business Activities, continued

SINCE 2002 - APPROX 3 HRS/MO - NO COMPENSATION

5) SPORTS CAR CLUB OF AMERICA SFR REGION P.O. BOX 308, WILLOWS, CA 95988 - AUTO RACING CLUB - DIRECTOR/TREASURER SINCE 2014 - APPROX 10 HRS/MO - NO COMPENSATION



Disclosure Events

What you should know about reported disclosure events:

1. All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
 - o A law enforcement agency must file formal charges before a broker is required to disclose a particular criminal event.
 - o A customer dispute must involve allegations that a broker engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.
 - o
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - o As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, brokerage firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
 - o
4. **There are different statuses and dispositions for disclosure events:**
 - o A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - § A "pending" event involves allegations that have not been proven or formally adjudicated.
 - § An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - § A "final" event has been concluded and its resolution is not subject to change.
 - o A final event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - § An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - § A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that brokers and brokerage firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - § A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.

For your convenience, below is a matrix of the number and status of disclosure events involving this broker. Further information regarding these events can be found in the subsequent pages of this report. You also may wish to contact the broker to obtain further information regarding these events.

	Pending	Final	On Appeal
ADJUDICATED			





Disclosure Event Details

When evaluating this information, please keep in mind that a disclosure event may be pending or involve allegations that are contested and have not been resolved or proven. The matter may, in the end, be withdrawn, dismissed, resolved in favor of the broker, or concluded through a negotiated settlement for certain business reasons (e.g., to maintain customer relationships or to limit the litigation costs associated with disputing the allegations) with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to CRD and therefore some of the specific data fields contained in the report may be blank if the information was not provided to CRD.

Criminal - Final Disposition

This type of disclosure event involves a criminal charge against the broker that has resulted in a conviction, acquittal, dismissal, or plea. The criminal matter may pertain to any felony or certain misdemeanor offenses, including bribery, perjury, forgery, counterfeiting, extortion, fraud, and wrongful taking of property.

Reporting Source:	Broker
Court Details:	SANTA MONICA POLICE DEPT - MUNICIPAL COURT OF SANTA MONICA CR 113793
Charge Date:	06/17/1982
Charge Details:	FIGHT. \$305 FINE PLUS 18 MO. PROBATION
Felony?	No
Current Status:	Final
Status Date:	06/17/1982
Disposition Details:	\$100 FINE WHICH WAS SUSPENDED 18 MO. PROBATION. - MISDEMEANOR -
Broker Statement	NOT PROVIDED

Reporting Source:	Broker
Court Details:	SANTA CRUZ P.D., MUNICIPAL COURT/SANTA CROZ. S056880
Charge Date:	05/14/1987

ADL000021



Charge Details:	BRIBE PUBLIC OFFICER
Felony?	No
Current Status:	Final
Status Date:	05/14/1987
Disposition Details:	CHARGE WAS DISMISSED - FURTHERANCE OF JUSTICE.
Broker Statement	I WAS ARRESTED FOR SUSPICION OF DUI, WHEN ASKED FOR MY I.D. I HANDED THE OFFICER MY WHOLE WALLET, WHICH HE MISCONSTRUED AS A BRIBE. CASE WAS A MISDEMEANOR CHARGE, BUT IT WAS DISMISSED.



Customer Dispute - Award / Judgment

This type of disclosure event involves a final, consumer-initiated, investment-related arbitration or civil suit containing allegations of sales practice violations against the broker that resulted in an arbitration award or civil judgment for the customer.

Reporting Source: Regulator

Employing firm when activities occurred which led to the complaint: FSC SECURITIES CORPORATION

Allegations: UNSUITABILITY, NEGLIGENCE, UNAUTHORIZED TRADING, BREACH OF FIDUCIARY DUTY, MISREPRESENTATION, NON-DISCLOSURE

Product Type: Mutual Fund(s)

Alleged Damages: \$151,958.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD - CASE #02-04811

Date Notice/Process Served: 08/14/2002

Arbitration Pending? No

Disposition: Award

Disposition Date: 08/01/2003

Disposition Detail: RESPONDENT IS LIABLE, JOINTLY AND SEVERALLY, AND SHALL PAY TO CLAIMANT THE SUM OF \$23,927.60 AS COMPENSATORY DAMAGES, PLUS INTEREST.

.....

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: FSC SECURITIES CORPORATION

Allegations: CLIENTS ALLEGES REPRESENTATIVE TRANSFERRED FUNDS THAT WERE IN A MONEY MARKET FUND INTO A STOCK FUND WITHOUT THEIR AUTHORIZATION.

Product Type: Mutual Fund(s)

Alleged Damages: \$151,958.00

ADL000023



Customer Complaint Information

Date Complaint Received: 03/22/2002
Complaint Pending? No
Status: Arbitration/Reparation
Status Date: 09/27/2002

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD CASE NO. 02-04811

Date Notice/Process Served: 09/27/2002
Arbitration Pending? No
Disposition: Award to Customer
Disposition Date: 08/01/2003
Monetary Compensation Amount: \$23,927.60
Individual Contribution Amount: \$5,000.00



Customer Dispute - Closed-No Action / Withdrawn / Dismissed / Denied

This type of disclosure event involves (1) a consumer-initiated, investment-related arbitration or civil suit containing allegations of sales practice violations against the individual broker that was dismissed, withdrawn, or denied; or (2) a consumer-initiated, investment-related written complaint containing allegations that the broker engaged in sales practice violations resulting in compensatory damages of at least \$5,000, forgery, theft, or misappropriation, or conversion of funds or securities, which was closed without action, withdrawn, or denied.

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	SII INVESTMENTS, INC
Allegations:	CLIENT ALLEGES SHE WAS NOT INFORMED OF TAX CONSEQUENCE UPON LIQUIDATION OF A VARIABLE ANNUITY TO PURCHASE A LIFE INSURANCE PRODUCT.
Product Type:	Annuity-Variable Insurance
Alleged Damages:	\$46,188.47
Is this an oral complaint?	No
Is this a written complaint?	Yes
Is this an arbitration/CFTC reparation or civil litigation?	No

Customer Complaint Information

Date Complaint Received:	04/02/2015
Complaint Pending?	No
Status:	Denied
Status Date:	04/13/2015

Settlement Amount:

Individual Contribution Amount:

Broker Statement	CLIENT WAS ADVISED TO GET THE COST BASIS AND SEEK TAX ADVICE FROM A PROFESSIONAL BEFORE SHE SURRENDERED THE INHERITED PRODUCT. SHE WAS GIVEN A REFERRAL TO A CPA SINCE SHE DID NOT HAVE ONE. IT WAS OVER A YEAR AFTER THE EVENT THAT SHE FINALLY SPOKE WITH A TAX PERSON, WHICH I HAD RECOMMENDED SHE DO FROM
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ADL000025



 THE START

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: SECURITIES SERVICE NETWORK, INC.

Allegations: CLIENT ALLEGES THAT MR. SULLIVAN NEVER "ADJUSTED TO PRESERVE MY PRINCIPAL DUE TO THE DECREASING VALUE OF MY IRA ACCOUNT."

Product Type: Equity Listed (Common & Preferred Stock)
Mutual Fund

Alleged Damages: \$67,000.00

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation? No

Customer Complaint Information

Date Complaint Received: 06/04/2009

Complaint Pending? No

Status: Closed/No Action

Status Date: 10/31/2009

Settlement Amount:

Individual Contribution Amount:
.....

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: SECURITIES SERVICE NETWORK, INC.

Allegations: CLIENT ALLEGES THAT MR. SULLIVAN NEVER "ADJUSTED TO PRESERVE MY PRINCIPAL DUE TO THE DECREASING VALUE OF MY IRA ACCOUNT."

Product Type: Equity Listed (Common & Preferred Stock)

ADL000026



Mutual Fund
Alleged Damages: \$67,000.00
Is this an oral complaint? No
Is this a written complaint? Yes
**Is this an arbitration/CFTC
 reparation or civil litigation?** No

Customer Complaint Information

Date Complaint Received: 06/04/2009
Complaint Pending? No
Status: Closed/No Action
Status Date: 10/31/2009
Settlement Amount:
**Individual Contribution
 Amount:**

Reporting Source: Broker
**Employing firm when
 activities occurred which led
 to the complaint:** SII INVESTMENTS, INC.
Allegations: CLIENT ALLEGES THAT THREE STOCK PURCHASED IN EARLY OCTOBER
 2008 WERE UNAUTHORIZED.
Product Type: Equity Listed (Common & Preferred Stock)
Alleged Damages: \$10,030.00

Customer Complaint Information

Date Complaint Received: 02/20/2009
Complaint Pending? No
Status: Denied
Status Date: 03/05/2009
Settlement Amount:

ADL000027



**Individual Contribution
Amount:**

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: SII INVESTMENTS, INC.

Allegations: CLIENT ALLEGES HE PLACED INSTRUCTIONS TO SELL MUTUAL FUNDS POSITIONS THAT WERE NOT EXECUTED TIMILY.

Product Type: Mutual Fund(s)

Alleged Damages: \$15,950.00

Customer Complaint Information

Date Complaint Received: 12/19/2008

Complaint Pending? No

Status: Denied

Status Date: 01/14/2009

Settlement Amount:

**Individual Contribution
Amount:**

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: SECURITIES SERVICE NETWORK, INC.

Allegations: CLIENT ALLEGES THAT "CMO BOND INVESTED ON 07/09/2008 FOR \$100K WAS NOT APPROVED FOR PURCHASE PRIOR TO MY KNOWLEDGE..."

Product Type: Debt - Asset Backed

Alleged Damages: \$5,000.00

Customer Complaint Information

Date Complaint Received: 09/19/2008

ADL000028



Complaint Pending? No
Status: Closed/No Action
Status Date: 10/03/2008
Settlement Amount:
Individual Contribution Amount:
Firm Statement BROKER'S RECORDS REFLECT MEETINGS WITH CLIENT JUST PRIOR TO BOND PURCHASE. NO COMPENSATORY DAMAGE AMOUNT WAS CLAIMED BUT A GOOD FAITH DETERMINATION BY THE FIRM THAT DAMAGES COULD EXCEED \$5000 DICTATES THE REPORTIN OF THIS COMPLAINT

Reporting Source: Broker
Employing firm when activities occurred which led to the complaint: SECURITIES SERVICE NETWORK, INC.
Allegations: CLIENT ALLEGES THAT "CMO BOND INVESTED ON 07/09/2008 FOR \$100K WAS NOT APPROVED FOR PURCHASE PRIOR TO MY KNOWLEDGE...
Product Type: Debt - Asset Backed
Alleged Damages: \$5,000.00

Customer Complaint Information

Date Complaint Received: 09/19/2008
Complaint Pending? No
Status: Closed/No Action
Status Date: 10/03/2008
Settlement Amount:
Individual Contribution Amount:
Broker Statement BROKER'S RECORDS REFLECT MEETINGS WITH CLIENT JUST PRIOR TO BOND PURCHASE. NO COMPENSATORY DAMAGE AMOUNT WAS CLAIMED BUT A GOOD FAITH DETERMINATION BY THE FIRM THAT DAMAGES COULD EXCEED \$5000 DICTATES THE REPORTING OF THIS COMPLAINT.

ADL000029

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: SECURITIES SERVICE NETWORK, INC.

Allegations: CLIENT ALLEGES THAT, "TIM DID NOT COMMUNICATE WITH ME ABOUT MY ACCOUNT...I WAS NEVER ADVISED OF THE INVESTMENT STRATEGY...INVESTMENTS MADE ON MY ACCOUNT WERE DONE WITHOUT MY APPROVAL AND WERE UNAUTHORIZED.' THE INVESTMENTS AT ISSUE OCCURRED BETWEEN 2006-2008

Product Type: Mutual Fund(s)

Alleged Damages: \$5,000.00

Customer Complaint Information

Date Complaint Received: 09/22/2008

Complaint Pending? No

Status: Closed/No Action

Status Date: 10/03/2008

Settlement Amount:

Individual Contribution Amount:

Firm Statement BROKER'S RECORDS REFLECT NUMEROUS MEETING AT CONTACTS DURING WHICH CLIENTS INVESTMENTS WERE DISCUSSED. NO COMPENSATORY DAMAGE CLAIM IS MADE BUT A GOOD FAITH DETERMINATION MADE BY THE FIRM THAT DAMAGES COULD EXCEED \$5,000 DICTATES THE REPORTIN OF THIS COMPLAINT

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: SECURITIES SERVICE NETWORK, INC.

Allegations: CLIENT ALLEGES THAT, "TIM DID NOT COMMUNICATE WITH ME ABOUT MY ACCOUNT... I WAS NEVER ADVISED OF THE INVESTMENT STRATEGY INVESTMENTS MADE ON MY ACCOUNT WERE DONE WITH OUT MY APPROVAL AND WERE UNAUTHORIZED." THE INVESTMENTS AT ISSUE OCCURRED BETWEEN 2006-2008.

ADL000030



Product Type: Mutual Fund(s)

Alleged Damages: \$5,000.00

Customer Complaint Information

Date Complaint Received: 09/22/2008

Complaint Pending? No

Status: Closed/No Action

Status Date: 10/03/2008

Settlement Amount:

Individual Contribution Amount:

Broker Statement

BROKER'S RECORDS REFLECT NUMEROUS MEETING AT CONTACTS DURING WHICH CLIENTS INVESTMENTS WERE DISCUSSED. NO COMPENSATORY DAMAGE CLAIM IS MADE BUT A GOOD FAITH DETERMINATION MADE BY THE FIRM THAT DAMAGES COULD EXCEED \$5,000 DICTATES THE REPORTING OF THIS COMPLAINT.



Customer Dispute - Pending

This type of disclosure event involves (1) a pending consumer-initiated, investment-related arbitration or civil suit that contains allegations of sales practice violations against the broker; or (2) a pending, consumer-initiated, investment-related written complaint containing allegations that the broker engaged in, sales practice violations resulting in compensatory damages of at least \$5,000, forgery, theft, or misappropriation, or conversion of funds or securities.

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: ALAMO CAPITAL

Allegations: CUSTOMER SENT A LETTER TO ALAMO CAPITAL STATING HE COULD NOT WITHDRAW MANDATORY IRA DIST FROM NEW V/A. HE ALLEDGED I USED MISLEADING PROACTICES. I FILED A RESPONSE TO ALAMO. V/A CONTRACT WAS REVERSED PER ALAMO, IN 02/2000.

Product Type: Annuity(ies) - Variable

Alleged Damages:

Customer Complaint Information

Date Complaint Received: 01/10/2000

Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: ALAMO CAPITAL

Allegations: SEE UNDER INTERNAL REVIEW DRP.

Product Type: Annuity(ies) - Variable

Alleged Damages:

Customer Complaint Information

Date Complaint Received: 12/29/1999

ADL000032



Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:
.....

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: ALAMO CAPITAL INVESTMENTS

Allegations: CUSTOMER SAID HE HAD DEFERRED SALES CHARGES ON HIS TRANSFERRING 403(B). THE PENALTY WAS 892.59 ON A TOTAL OF 207587.67. .04% HIS RATE OF RETURN WAS INCREASED BY 6%. HE KNEW OF THE PENALTIES AND SIGNED ALL APPROPRIATE PAPERWORK

Product Type: Annuity(ies) - Variable

Alleged Damages:

Customer Complaint Information

Date Complaint Received: 01/20/2000

Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:



Employment Separation After Allegations

This type of disclosure event involves a situation where the broker voluntarily resigned, was discharged, or was permitted to resign after being accused of (1) violating investment-related statutes, regulations, rules or industry standards of conduct; (2) fraud or the wrongful taking of property; or (3) failure to supervise in connection with investment-related statutes, regulations, rules, or industry standards of conduct.

Reporting Source: Firm
Employer Name: SII INVESTMENTS
Termination Type: Discharged
Termination Date: 12/07/2017
Allegations: REP FAILED TO DISCLOSE TAX LIENS AND UPDATE FORM U4, AND USED UNAPPROVED EMAIL
Product Type: No Product

Reporting Source: Broker
Employer Name: SII INVESTMENTS, INC.
Termination Type: Discharged
Termination Date: 12/07/2017
Allegations: TERMINATION BASED UPON FAILURE TO DISCLOSE TAX LIENS AND UPDATE FORM U4, AND USE OF UNAPPROVED EMAIL.
Product Type: No Product



Judgment / Lien

This type of disclosure event involves an unsatisfied and outstanding judgments or liens against the broker.

Reporting Source:	Broker
Judgment/Lien Holder:	STATE OF CALIFORNIA
Judgment/Lien Amount:	\$58,354.00
Judgment/Lien Type:	Tax
Date Filed with Court:	01/15/2015
Date Individual Learned:	09/26/2016
Type of Court:	State Court
Name of Court:	STATE OF CALIFORNIA
Location of Court:	Martinez, CA
Docket/Case #:	15000739500
Judgment/Lien Outstanding?	Yes
Broker Statement	This state tax lien was erroneously combined, and previously disclosed, with a separate federal tax lien. The occurrence number for this prior disclosure is #1905605. This disclosure is being made to correct that error and separate the two liens.

Reporting Source:	Broker
Judgment/Lien Holder:	State of California
Judgment/Lien Amount:	\$31,464.00
Judgment/Lien Type:	Tax
Date Filed with Court:	10/05/2016
Date Individual Learned:	10/03/2017
Type of Court:	State Court
Name of Court:	RECORDER OF DEEDS
Location of Court:	Martinez, CA
Docket/Case #:	16020732500

ADL000035



Judgment/Lien Outstanding? Yes

Reporting Source: Broker

Judgment/Lien Holder: IRS

Judgment/Lien Amount: \$278,906.00

Judgment/Lien Type: Tax

Date Filed with Court: 12/29/2015

Date Individual Learned: 09/29/2016

Type of Court: State Court

Name of Court: CONTRA COSTA COUNTY COURT

Location of Court: PITTSBURG CA

Docket/Case #: 2015026579900

Judgment/Lien Outstanding? Yes

Broker Statement REP WAS UNAWARE THAT THIS TURNED INTO A LIEN. HAD BEEN WORKING WITH IRS FOR MANY YEARS. CURRENTLY WORKING FOR A RESOLUTION LETTER FROM IRS. ***1/15/2015 Docket/Case #2015000739500 was inadvertently left off and is part of this disclosure***REPORTED 2015000739500 ERRONEOUSLY COMBINED, REMOVED AND REPORTED ON SEPARATE DRP***

End of Report



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Individual Snapshot Report

Data current as of: 2/4/2018

NOTICE

This report contains information from the Central Registration Depository (CRD®) and/or the Investment Adviser Registration Depository (IARD™), which are operated by the Financial Industry Regulatory Authority (FINRA®), a national securities association registered under the Securities Exchange Act of 1934. The CRD system primarily contains information submitted on uniform broker-dealer and agent registration forms and certain other information related to registration and licensing. The IARD system primarily contains information submitted on uniform investment adviser and agent registration forms and certain other information related to registration and licensing.

FINRA operates the CRD system in its capacity as a registered national securities association and pursuant to an agreement with the North American Securities Administrators Association, Inc. (NASAA).

FINRA operates the IARD system as a vendor pursuant to a contract with the Securities and Exchange Commission and undertakings with NASAA and participating state regulators.

2969989
Sullivan, Timothy Charles
SULLIVAN, TIM
California
Yes
No

02/01/2006	PRESENT		DANVILLE	CA
07/01/2003	10/2003		DUBLIN	CA
04/01/1997	08/1997		DANVILLE	CA
11/01/1990	01/1997		DANVILLE	CA

INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC	144426	01/11/2018	Present
CA	RA	01/11/2018	APPROVED 01/11/2018

SII INVESTMENTS, INC.	2225	09/02/2008	12/07/2017	DISCHARGE	TERMINATION BASED UPON FAILURE TO DISCLOSE TAX LIENS AND UPDATE FORM U4, AND USE OF UNAPPROVED EMAIL.
FINRA	GP		12/07/2017	TERMED	09/02/2008
AZ	AG		12/07/2017	TERMED	09/02/2008
CA	RA		12/07/2017	TERMED	09/03/2008
FL	RA		12/07/2017	TERMED	03/17/2014
IL	AG		12/07/2017	TERMED	09/02/2008
LA	AG		12/07/2017	TERMED	09/02/2008
MI	RA		12/07/2017	TERMED	10/30/2010
NC	AG		12/07/2017	TERMED	09/02/2008
NJ	RA		12/07/2017	TERMED	09/04/2008
NV	RA		12/07/2017	TERMED	09/04/2008
OR	AG		12/07/2017	TERMED	09/23/2008
PA	AG		12/07/2017	TERMED	09/02/2008
TX	RA		12/07/2017	TERMED	10/18/2017
WA	AG		12/07/2017	TERMED	09/02/2008

SECURITIES SERVICE NETWORK, INC.	13318	07/26/2006	09/02/2008	VOLUNTARY	
FINRA	GP		09/02/2008	TERMED	07/28/2006
AZ	AG		09/02/2008	TERMED	07/28/2006
FL	AG		09/02/2008	TERMED	04/12/2007
IL	AG		09/02/2008	TERMED	08/02/2006
LA	AG		09/02/2008	TERMED	09/15/2006
MD	AG		09/02/2008	TERMED	07/28/2006
NJ	AG		09/02/2008	TERMED	09/14/2006
NY	AG		09/02/2008	TERMED	07/28/2006
PA	AG		09/02/2008	TERMED	07/28/2006
WA	AG		09/02/2008	TERMED	07/28/2006

AZ	RA			11/01/2002	TRANS_ERROR			
CO	RA			11/01/2002	TRANS_ERROR			
FSC SECURITIES CORPORATION		7461	12/23/1999	07/24/2006	VOLUNTARY			
FINRA	GP			07/28/2006	TERMED			01/07/2000
AK	AG			04/24/2003	T_NOREG			
CA	AG			07/28/2006	TERMED			01/07/2000
CO	AG			04/25/2002	T_NOREG			
FL	AG			09/02/2004	T_NOREG			
IL	AG			07/28/2006	TERMED			02/15/2005
LA	AG			07/28/2006	TERMED			01/07/2004
MO	AG			02/25/2005	T_NOREG			
NJ	AG			02/16/2006	T_NOREG			
NY	AG			07/28/2006	TERMED			08/11/2005
PA	AG			07/28/2006	TERMED			02/03/2006
TX	AG			09/13/2004	T_NOREG			
FINRA	GP			01/25/2000	TERMED			05/18/1999
CA	AG			01/25/2000	TERMED			12/15/1997

No Designations

01/16/2018	01/18/2018	INTERNATIONAL ASSETS ADVISORY, LLC (10645)		Non Registered Location	No	No	Located At	390 N Orange Ave Suite 750 Orlando, FL 32801 United States	
01/11/2018	Present	INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC (144426)	Yes	Non Registered Location	No	No	Located At	2603 CAMINO RAMON SUITE 200 SAN RAMON, CA 94563 United States	
09/11/2008	12/07/2017	SII INVESTMENTS, INC. (2225)	Yes	379644	10232	Yes	No	Located At	2603 CAMINO RAMON SUITE 200 SAN RAMON, CA 94563 United States
09/02/2008	12/07/2017	SII INVESTMENTS, INC. (2225)	Yes	Non Registered Location	No	No	Located At	2603 CAMINO RAMON STE 200 SAN RAMON, CA 94526 United States	
06/02/2006	09/02/2008	SECURITIES SERVICE NETWORK, INC. (13318)	Yes	297401		Yes	No	Located At	185 FRONT STREET SUITE 204 DANVILLE, CA 94526 United States
06/27/2006	07/24/2006	FSC SECURITIES CORPORATION (7461)	Yes	286284	C2W	Yes	No	Located At	185 FRONT STREET SUITE 204 DANVILLE, CA 94526 United States
12/15/1999	08/01/2006	THE RETIREMENT GROUP (123102)		Non Registered Location	No	No	Located At	707 BROADWAY SUITE 1200 SAN DIEGO, CA 92101 United States	

01/2018	PRESENT	INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC	SAN RAMON, CA United States	FINANCIAL ADVISOR	Yes
06/2006	03/2009	THE RETIREMENT GROUP	SAN DIEGO, CA United States	INVESTMENT ADVISOR REPRESENTATIVE	Yes
12/1999	07/2006	FSC SECURITIES	WALNUT CREEK, CA United States	REGISTERED REP	Yes
08/1997	12/1999	ALAMO CAPITAL	WALNUT CREEK, CA United States	VICE PRESIDENT REGISTERED REPS	Yes
01/1993	06/1995	SPARTAN MEDICAL CLAIMS	DANVILLE, CA United States	OTHER - OWNER/OPERATOR	No
10/1990	12/1992	TONY ROMOS OF DANVILLE	DANVILLE, CA United States	OTHER - GENERAL MANAGER	No

1) MONARCH PRIVATE CLIENT GROUP 550 MIKADO PLACE, DANVILLE, CA 94526 - LICENSED INSURANCE AGENT PROVIDING FIXED INSURANCE PRODUCTS - PRESIDENT SINCE 2010 - APPROX 3 HRS/MO - COMMISSIONS 2) MONARCH ADVISORS 550 MIKADO PLACE, DANVILLE, CA 94526 - LICENSED INSURANCE AGENT PROVIDING FIXED INSURANCE PRODUCTS - OWNER SINCE 2013 - APPROX 3 HRS/MO - COMMISSIONS 3) TS CLASSICS & AUTOMOTIVE 2035 SAN RAMON VALLEY BLVD, SAN RAMON, CA 94583 - AUTOMOTIVE REPAIR - OWNER SINCE 6/2014 - APPROX 15 HRS/MO - NET PROFITS 4) NORTHERN CALIFORNIA CORVETTE ASSN P.O. BOX 6232, HAYWARD, CA 94540 - CAR CLUB - PRESIDENT SINCE 2002 - APPROX 3 HRS/MO - NO COMPENSATION 5) SPORTS CAR CLUB OF AMERICA SFR REGION P.O. BOX 308, WILLOWS, CA 95988 - AUTO RACING CLUB - DIRECTOR/TREASURER SINCE 2014 - APPROX 10 HRS/MO - NO COMPENSATION

57	22547229	Official Result	12/11/1997	12/11/1997	Passed	72
563	22547227	Official Result	12/12/1997	12/12/1997	Passed	78

No Exzm Appointments

REQUIRED
12/15/1997

No Current CE Appointments

Anniversary	34761616	201	REQUIRED	12/15/2017	12/15/2017 - 04/13/2018
12/15/2020 - 04/13/2021	36490307		Anniversary		

No CE Inactive History

IF THE ANSWER TO ANY OF THE FOLLOWING QUESTIONS IS 'YES', COMPLETE DETAILS OF ALL EVENTS OR PROCEEDINGS ON APPROPRIATE DRP(S)

14A. (1) Have you ever: Yes No

(a) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any felony?

(b) been charged with any felony?

(2) Based upon activities that occurred while you exercised control over it, has an organization ever:

(a) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic or foreign court to any felony?

(b) been charged with any felony?

14B. (1) Have you ever: Yes No

(a) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign or military court to a misdemeanor involving: investments or an investment-related business or any fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?

(b) been charged with a misdemeanor specified in 14B(1)(a)?

(2) Based upon activities that occurred while you exercised control over it, has an organization ever:

(a) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic or foreign court to a misdemeanor specified in 14B(1)(a)?

(b) been charged with a misdemeanor specified in 14B(1)(a)?

14C. Has the U.S. Securities and Exchange Commission or the Commodity Futures Trading Commission ever: Yes No

(1) found you to have made a false statement or omission?

(2) found you to have been involved in a violation of its regulations or statutes?

(3) found you to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?

(4) entered an order against you in connection with investment-related activity?

(5) imposed a civil money penalty on you, or ordered you to cease and desist from any activity?

ADL000040

(6) found you to have willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or found you to have been unable to comply with any provision of such Act, rule or regulation?	<input type="radio"/>	<input type="radio"/>
(7) found you to have willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board?	<input type="radio"/>	<input type="radio"/>
(8) found you to have failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board?	<input type="radio"/>	<input type="radio"/>
14D. (1) Has any other Federal regulatory agency or any state regulatory agency or foreign financial regulatory authority ever:	Yes	No
(a) found you to have made a false statement or omission or been dishonest, unfair or unethical?	<input type="radio"/>	<input type="radio"/>
(b) found you to have been involved in a violation of investment-related regulation(s) or statute(s)?	<input type="radio"/>	<input type="radio"/>
(c) found you to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked or restricted?	<input type="radio"/>	<input type="radio"/>
(d) entered an order against you in connection with an investment-related activity?	<input type="radio"/>	<input type="radio"/>
(e) denied, suspended, or revoked your registration or license or otherwise, by order, prevented you from associating with an investment-related business or restricted your activities?	<input type="radio"/>	<input type="radio"/>
(2) Have you been subject to any final order of a state securities commission (or any agency or officer performing like functions), state authority that supervises or examines banks, savings associations, or credit unions, state insurance commission (or any agency or office performing like functions), an appropriate federal banking agency, or the National Credit Union Administration, that:	<input type="radio"/>	<input type="radio"/>
(a) bars you from association with an entity regulated by such commission, authority, agency, or officer, or from engaging in the business of securities, insurance, banking, savings association activities, or credit union activities; or	<input type="radio"/>	<input type="radio"/>
(b) constitutes a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	<input type="radio"/>	<input type="radio"/>
14E. Has any self-regulatory organization ever:	Yes	No
(1) found you to have made a false statement or omission?	<input type="radio"/>	<input type="radio"/>
(2) found you to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the U.S. Securities and Exchange Commission)?	<input type="radio"/>	<input type="radio"/>
(3) found you to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked or restricted?	<input type="radio"/>	<input type="radio"/>
(4) disciplined you by expelling or suspending you from membership, barring or suspending your association with its members, or restricting your activities?	<input type="radio"/>	<input type="radio"/>
(5) found you to have willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or found you to have been unable to comply with any provision of such Act, rule or regulation?	<input type="radio"/>	<input type="radio"/>
(6) found you to have willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board?	<input type="radio"/>	<input type="radio"/>
(7) found you to have failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board?	<input type="radio"/>	<input type="radio"/>
14F. Have you ever had an authorization to act as an attorney, accountant or federal contractor that was revoked or suspended?	<input type="radio"/>	<input type="radio"/>
14G. Have you been notified, in writing, that you are now the subject of any:	Yes	No
(1) regulatory complaint or proceeding that could result in a "yes" answer to any part of 14C, D or E? (If "yes", complete the Regulatory Action Disclosure Reporting Page.)	<input type="radio"/>	<input type="radio"/>
(2) investigation that could result in a "yes" answer to any part of 14A, B, C, D or E? (If "yes", complete the Investigation Disclosure Reporting Page.)	<input type="radio"/>	<input type="radio"/>
14H. (1) Has any domestic or foreign court ever:	Yes	No
(a) enjoined you in connection with any investment-related activity?	<input type="radio"/>	<input type="radio"/>
(b) found that you were involved in a violation of any investment-related statute(s) or regulation(s)?	<input type="radio"/>	<input type="radio"/>
(c) dismissed, pursuant to a settlement agreement, an investment-related civil action brought against you by a state or foreign financial regulatory authority?	<input type="radio"/>	<input type="radio"/>
(2) Are you named in any pending investment-related civil action that could result in a "yes" answer to any part of 14H(1)?	<input type="radio"/>	<input type="radio"/>
14I. (1) Have you ever been named as a respondent/defendant in an investment-related, consumer-initiated arbitration or civil litigation which alleged that you were involved in one or more sales practice violations and which:	Yes	No
(a) is still pending, or;	<input type="radio"/>	<input type="radio"/>
(b) resulted in an arbitration award or civil judgment against you, regardless of amount, or;	<input type="radio"/>	<input type="radio"/>
(c) was settled, prior to 05/18/2009, for an amount of \$10,000 or more, or;	<input type="radio"/>	<input type="radio"/>
(d) was settled, on or after 05/18/2009, for an amount of \$15,000 or more?	<input type="radio"/>	<input type="radio"/>
(2) Have you ever been the subject of an investment-related, consumer-initiated (written or oral) complaint, which alleged that you were involved in one or more sales practice violations, and which:	<input type="radio"/>	<input type="radio"/>
(a) was settled, prior to 05/18/2009 for an amount of \$10,000 or more, or;	<input type="radio"/>	<input type="radio"/>
(b) was settled, on or after 05/18/2009, for an amount of \$15,000 or more?	<input type="radio"/>	<input type="radio"/>
(3) Within the past twenty four (24) months, have you been the subject of an investment-related, consumer-initiated, written complaint, not otherwise reported under question 14I(2) above, which:	<input type="radio"/>	<input type="radio"/>
(a) alleged that you were involved in one or more sales practice violations and contained a claim for compensatory damages of \$5,000 or more (if no damage amount is alleged, the complaint must be reported unless the firm has made a good faith determination that the damages from the alleged conduct would be less than \$5,000), or;	<input type="radio"/>	<input type="radio"/>
(b) alleged that you were involved in forgery, theft, misappropriation or conversion of funds or securities?	<input type="radio"/>	<input type="radio"/>
Answer questions (4) and (5) below only for arbitration claims or civil litigation filed on or after 05/18/2009.		
(4) Have you ever been the subject of an investment-related, consumer-initiated arbitration claim or civil litigation which alleged that you were involved in one or more sales practice violations, and which:	<input type="radio"/>	<input type="radio"/>
(a) was settled for an amount of \$15,000 or more, or;	<input type="radio"/>	<input type="radio"/>
(b) resulted in an arbitration award or civil judgment against any named respondent(s)/defendant(s), regardless of any amount?	<input type="radio"/>	<input type="radio"/>
(5) Within the past twenty four (24) months, have you been the subject of an investment-related, consumer-initiated arbitration claim or civil litigation not otherwise reported under questions 14I(4) above, which:	<input type="radio"/>	<input type="radio"/>
(a) alleged that you were involved in one or more sales practice violations and contained a claim for compensatory damages of \$5,000 or more (if no damage amount is alleged, the arbitration claim or civil litigation, must be reported unless the firm has made a good faith determination that the damages from the alleged conduct would be less than \$5,000), or;	<input type="radio"/>	<input type="radio"/>
(b) alleged that you were involved in forgery, theft, misappropriation or conversion of funds or securities?	<input type="radio"/>	<input type="radio"/>
14J. Have you ever voluntarily resigned, been discharged or permitted to resign after allegations were made that accused you of:	Yes	No
(1) violating investment-related statutes, regulations, rules, or industry standards of conduct?	<input type="radio"/>	<input type="radio"/>
(2) fraud or the wrongful taking of property?	<input type="radio"/>	<input type="radio"/>
(3) failure to supervise in connection with investment-related statutes, regulations, rules or industry standards of conduct?	<input type="radio"/>	<input type="radio"/>
14K. Within the past 10 years:	Yes	No
(1) have you made a compromise with creditors, filed a bankruptcy petition or been the subject of an involuntary bankruptcy petition?	<input type="radio"/>	<input type="radio"/>

- (2) based upon events that occurred while you exercised control over it, has an organization made a compromise with creditors, filed a bankruptcy petition or been the subject of an involuntary bankruptcy petition?
- (3) based upon events that occurred while you exercised control over it, has a broker or dealer been the subject of an involuntary bankruptcy petition, or had a trustee appointed, or had a direct payment procedure initiated under the Securities Investor Protection Act?
- 14L. Has a bonding company ever denied, paid out on, or revoked a bond for you?
- 14M. Do you have any unsatisfied judgments or liens against you?

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Current Disclosure Events

This Disclosure Reporting Page is an INITIAL OR AMENDED response to report details for affirmative responses to Items 23A and 23B on page 3 of Form U-4;
 Check item(s) you are responding to:

- 23A(1)(a) 23A(2)(a) 23B(1)(a) 23B(2)(a)
 23A(1)(b) 23A(2)(b) 23B(1)(b) 23B(2)(b)

Use this DRP to report all charges arising out of the same event. One event may result in more than one affirmative answer to the above items. Multiple counts of the same charge arising out of the same event should be reported on the same DRP. Unrelated criminal actions, including separate cases arising out of the same event, must be reported on separate DRPs.
Applicable court documents (i.e., criminal complaint, information or indictment as well as judgment of conviction or sentencing documents) must be provided to the CRD if not previously submitted.

- If charge(s) were brought against an organization over which you exercise(d) control: Enter Organization Name, whether or not the organization was an investment-related business and your position, title or relationship.
- Formal Charge(s) were brought in: (Include name of Federal, Military, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case number).
 SANTA CRUZ P.D., MUNICIPAL COURT/SANTA CROZ. S056880
- Event Disclosure Detail (Use this for both organizational and individual charges.)
 - Date First Charged (MM/DD/YYYY):
 05/14/1987 Exact Explanation
 If not exact, provide explanation:
 - Event Disclosure Detail (Include Charge(s)/Charge Description(s), and for each charge provide: 1 number of counts, 2 felony or misdemeanor, 3 plea for each charge, and 4 product type if charge is investment-related):
 BRIBE PUBLIC OFFICER
 - Did any of the Charge(s) within the Event involve a Felony? Yes No
 - Current status of the Event? Pending On Appeal Final
 - Event Status Date (complete unless status is Pending) (MM/DD/YYYY):
 05/14/1987 Exact Explanation
 If not exact, provide explanation:
- Disposition Disclosure Detail
 Include for each charge, A Disposition Type [e.g., convicted, acquitted, dismissed, pretrial, etc.], B Date, C Sentence/Penalty, D Duration [if sentence-suspension, probation, etc.], E Start Date of Penalty, F Penalty/Fine Amount and G Date Paid.
 CHARGE WAS DISMISSED - FURTHERANCE OF JUSTICE.
- Provide a brief summary of circumstances leading to the charge(s) as well as the disposition. Include the relevant dates when the conduct which was the subject of the charge(s) occurred. (Your information must fit within the space provided.)
 I WAS ARRESTED FOR SUSPICION OF DUI, WHEN ASKED FOR MY I.D. I HANDED THE OFFICER MY WHOLE WALLET, WHICH HE MISCONSTRUEO AS A BRIBE. CASE WAS A MISDEMEANOR CHARGE, BUT IT WAS OIISMISSED.

This Disclosure Reporting Page is an INITIAL or AMENDED response to report details for affirmative responses to Questions 14A and 14B on Form U4;
 Check question(s) you are responding to:

- 14A(1)(a) 14A(2)(a) 14B(1)(a) 14B(2)(a)
 14A(1)(b) 14A(2)(b) 14B(1)(b) 14B(2)(b)

Use this DRP to report all charges arising out of the same event. One event may result in more than one affirmative answer to the above items. Multiple counts of the same charge arising out of the same event should be reported on the same DRP. Unrelated criminal actions, including separate cases arising out of the same event, must be reported on separate DRPs.
Applicable court documents (i.e., criminal complaint, information or indictment as well as judgment of conviction or sentencing documents) must be provided to the CRD if not previously submitted.

- If charge(s) were brought against an organization over which you exercise(d) control: Enter Organization Name, whether or not the organization was an investment-related business and your position, title or relationship.
- Formal Charge(s) were brought in: (Include name of Federal, Military, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case number).
 SANTA MONICA POLICE DEPT - MUNICIPAL COURT OF SANTA MONICA CR 113793
- Event Disclosure Detail (Use this for both organizational and individual charges.)

ADL000042

- A. Date First Charged (MM/DD/YYYY):
06/17/1982 Exact Explanation
If not exact, provide explanation:
- B. Event Disclosure Detail (Include Charge(s)/ Charge Description(s), and for each charge provide: 1. number of counts, 2. felony or misdemeanor, 3. plea for each charge, and 4. product type if charge is investment-related):
FIGHT. \$305 FINE PLUS 18 MO. PROBATION
- C. Did any of the Charge(s) within the Event involve a Felony? Yes No
- D. Current status of the Event? Pending On Appeal Final
- E. Event Status Date (complete unless status is Pending) (MM/DD/YYYY):
06/17/1982 Exact Explanation
If not exact, provide explanation:
4. Disposition Disclosure Detail
Include for each charge, A. Disposition Type [e.g., convicted, acquitted, dismissed, pretrial, etc.], B. Date, C. Sentence/Penalty, D. Duration [if sentence-suspension, probation, etc.], E. Start Date of Penalty, F. Penalty/Fine Amount and G. Date Paid.
\$100 FINE WHICH WAS SUSPENDED 13 MO. PROBATION. - MISDEMEANOR -
5. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the charge(s) as well as the current status or final disposition. Your information must fit within the space provided.
NOT PROVIDED

This Disclosure Reporting Page (DRP U-5) is an INITIAL OR AMENDED response to report details for affirmative responses to Item 15 of Form U-5;

Check Item(s) being responded to:

15

If the individual has been notified that the internal review has been concluded without formal action, complete items 1, 2, 3 and 4 of this DRP to update.

1. Notice Received From: (Name of firm initiating the internal review):
ALAMO CAPITAL
2. Date internal review initiated (MM/DD/YYYY):
12/29/1999 Exact Explanation
If not exact, provide explanation:
CLIENT DANIEL SIENES WROTE COMPLAINT LETTER TO GE LIFE & ANNUITY RE HIS POLICY THAT TIM SULLIVAN SOLD HIM. CLIENT STATES TIM USED FRAUD TO SELL HIM THE POLICY.
3. Describe briefly the nature of the internal review or details of the conclusion. (The information must fit within the space provided.):
ALL PAPERWORK AND INFORMATION BEING GATHERED FROM CLIENT AND GE. INTERACTING WITH TIM SULLIVAN ALSO.
4. Date internal review concluded (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
MATTER STILL PENDING RESOLUTION.

INDIVIDUAL SUBJECT MAY USE THIS SPACE FOR DETAILS TO AFFIRMATIVE ANSWERS OF ITEM 15 ONLY

The individual who is the subject of the internal review may provide a brief summary of this event. The summary must fit within the space provided below. This summary may be submitted electronically to the CRD by the terminating firm or may be sent to: CRD, P.O. Box 9495 Gaithersburg, MD 20898-9495.

This Disclosure Reporting Page (DRP U-5) is an INITIAL OR AMENDED response to report details for affirmative responses to Item 15 of Form U-5;

Check Item(s) being responded to:

15

If the individual has been notified that the internal review has been concluded without formal action, complete items 1, 2, 3 and 4 of this DRP to update.

1. Notice Received From: (Name of firm initiating the internal review):
ALAMO CAPITAL
2. Date internal review initiated (MM/DD/YYYY):
01/09/2000 Exact Explanation
If not exact, provide explanation:
3. Describe briefly the nature of the internal review or details of the conclusion. (The information must fit within the space provided.):
COMPLAINT LETTER RECEIVED FROM CLIENT LEO DOMINGUEZ. CLIENT DISPUTING SURRENDER FEE CHARGED WHEN 1035 EXCHANGED A POLICY TO HARTFORD LIFE.
4. Date internal review concluded (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
MATTER STILL PENDING.

INDIVIDUAL SUBJECT MAY USE THIS SPACE FOR DETAILS TO AFFIRMATIVE ANSWERS OF ITEM 15 ONLY

The individual who is the subject of the internal review may provide a brief summary of this event. The summary must fit within the space provided below. This summary may be submitted electronically to the CRD by the terminating firm or may be sent to: CRD, P.O. Box 9495 Gaithersburg, MD 20898-9495.

This Disclosure Reporting Page is an INITIAL OR AMENDED response to report details for affirmative response to Question 14I on Form U4;

Check question(s) you are responding to:

14I(1)(a)

14I(1)(b)

14I(1)(c)

14I(2)

14I(3)(a)

14I(3)(b)

One event may result in more than one affirmative answer to the above items. Use only one DRP to report details related to one customer complaint/arbitration/civil litigation. Use a separate DRP for each customer complaint/arbitration/civil litigation.

DRP Instructions:

- In all matters (i.e., customer complaints, arbitrations/CFTC reparations, civil litigations), complete items 1-6.
- If the matter involves only a customer complaint, also complete items 7-12, as appropriate.
- If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.
- If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.
- If the matter involves a civil litigation, complete items 20-27.
- Item 28 is an optional field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation).

Complete items 1-6 for all events.

- Customer Name(s):
WILLIAM B ANTOINETTE HARRIS
- Customer(s) State of Residence:
Washington
Other state(s) of residence/detail:
- Employing Firm when activities occurred which led to the complaint:
FSC SECURITIES CORPORATION
- Allegation(s) and a brief summary of events related to the allegation(s) including dates when activities leading to the allegation(s) occurred:
CLIENTS ALLEGES REPRESENTATIVE TRANSFERRED FUNDS THAT WERE IN A MONEY MARKET FUND INTO A STOCK FUND WITHOUT THEIR AUTHORIZATION.
- Principal Product Type:
Mutual Fund(s)
Other Product Types:
- Alleged Compensatory Damage Amount:
\$ 151,958.00

If the matter involves only a customer complaint, complete items 7-12, as appropriate.

- Date Customer Complaint was received (MM/DD/YYYY):
03/22/2002 Exact Explanation
If not exact, provide explanation:
- Is the customer complaint pending? Yes No

If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.

- If the customer complaint is not pending, provide status:
If status is settlement, complete items 11 and 12;
If status is arbitration/reparation, complete items 13-19;
If status is litigation, complete items 20-27.
 Closed/No Action Withdrawn Denied
 Settled Arbitration/Reparation Litigation
- Status Date (MM/DD/YYYY):
09/27/2002 Exact Explanation
If not exact, provide explanation:
- Settlement Amount (if settled without arbitration, litigation or reparation):
\$
- Individual Contribution Amount:
\$

If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.

- Arbitration/Reparation claim filed with FINRA, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
NASO CASE NO. 02-04811
- Date notice/process was served (MM/DD/YYYY):
09/27/2002 Exact Explanation
If not exact, provide explanation:
- Is arbitration/reparation pending? Yes No
- If the arbitration is not pending, what was the disposition?
Award to Customer
- Disposition Date (MM/DD/YYYY):
08/01/2003 Exact Explanation
If not exact, provide explanation:
- Amount of Monetary Compensation (award, settlement, reparation amount):
\$ 23,927.60
- Individual Contribution Amount:
\$ 5,000.00

If the matter involves a civil litigation, complete items 20-27.

- Court that case was filed in (Include name of Federal, Military, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case number).
- Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
- Is the civil litigation pending? Yes No
- If the civil litigation is not pending, what was the disposition?
- Disposition Date (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
- Amount of Monetary Compensation (judgment, restitution, settlement amount):
\$
- Individual Contribution Amount:
\$

ADL000044

27. If the action is currently on appeal enter date appeal filed (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:
28. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the customer complaint, arbitration/CFTC reparation and/or civil litigation as well as the current status or final disposition(s). Your information must fit within the space provided.

This Disclosure Reporting Page is an INITIAL OR AMENDED

1. Case Name:
WILLIAM E. AND ANTOINETTE HARRIS V FSC SECURITIES CORPORATION, AND TIMOTHY C. SULLIVAN ET AL.
2. Arbitration/Reparation filed with:
NASD
3. Date case was initiated (MM/DD/YYYY):
08/14/2002
4. Case Number:
02-04811
5. Employing Firm when events occurred which led to the arbitration/reparation:
FSC SECURITIES CORPORATION
6. Allegation(s):
UNSUITABILITY, NEGLIGENCE, UNAUTHORIZED TRADING, BREACH OF FIDUCIARY DUTY, MISREPRESENTATION, NON-DISCLOSURE
7. Principal Product Type:
Mutual Fund(s)
Other Product Types:
8. Alleged Compensatory Damage Amount:
\$ 151,958.00
9. Is arbitration/reparation currently pending? Yes No
 If No, how was arbitration/reparation resolved?
 Award
 Resolution Date (MM/DD/YYYY):
 08/01/2003
10. Disposition details:
RESPONDENT IS LIABLE, JOINTLY AND SEVERALLY, AND SHALL PAY TO CLAIMANT THE SUM OF \$23,927.60 AS COMPENSATORY DAMAGES, PLUS INTEREST.

This Disclosure Reporting Page is an INITIAL or AMENDED response to report details for affirmative response(s) to Question(s) 14M on Form U4;
 Check the question(s) you are responding to, regardless of whether you are answering the question(s) "yes" or amending the answer(s) to "no":

14M

[Click here to view question text](#)

If multiple, unrelated events result in the same affirmative answer, details must be provided on separate DRPs.

1. Judgment/Lien Amount:
\$ 162,759.00
2. Judgment/Lien Holder:
FEDERAL TAX LIEN
3. Judgment/Lien Type:
 Civil Tax
4. A. Date Filed with Court (MM/DD/YYYY):
07/30/2013 Exact Explanation
 If not exact, provide explanation:
 B. Date individual learned of the Judgment/Lien (MM/DD/YYYY):
 10/08/2014 Exact Explanation
 If not exact, provide explanation:
5. Court action brought in:
 Federal Court State Court Foreign Court Other:
 A. Name of Court (Federal, State, Foreign or Other):
 RECORDER OF DEEDS
 B. Location of Court (City or County and State or Country):
 MARTINEZ, CA
 C. Docket/Case#:
 13018891400
 Check this box if the Docket/Case# is your SSN, a Bank Card number, or a Personal Identification Number.
6. Is Judgment/Lien Outstanding?
 Yes No
 If "No", complete item 7. If "Yes", skip to item 8.
7. If Judgment/Lien is not outstanding, provide:
 A. Status Date (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:
 B. How was matter resolved? (select appropriate item):
 Discharged Released Removed Satisfied
8. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the action as well as the current status or final disposition. Your information must fit within the space provided.
 THIS HAS BEEN IN CONTENTION WITH THE IRS FOR ALMOST SIX YEARS. THE LIEN FROM 2010 SHOWS PAID, HOWEVER, IT WAS NOT PAID, IT WAS RELEASED. OTHER LIEN SHOULD BE RELEASED ONCE LEGAL PROCEDURES WITH IRS ARE CONCLUDED. REQUIRING THIS TO BE REPORTED WHILE BEING CONTESTED WITH IRS IS UNJUST.

ADL000045

This Disclosure Reporting Page is an INITIAL or AMENDED response to report details for affirmative response(s) to Question(s) 14M on Form U4; Check the question(s) you are responding to, regardless of whether you are answering the question(s) "yes" or amending the answer(s) to "no":

14M

[Click here to view question text](#)

If multiple, unrelated events result in the same affirmative answer, details must be provided on separate DRPs.

1. Judgment/Lien Amount:
\$ 278,906.00
2. Judgment/Lien Holder:
IRS
3. Judgment/Lien Type:
 Civil Tax
4. A. Date Filed with Court (MM/DD/YYYY):
12/29/2015 Exact Explanation
If not exact, provide explanation:
B. Date individual learned of the Judgment/Lien (MM/DD/YYYY):
09/29/2016 Exact Explanation
If not exact, provide explanation:
BECAME AWARE DURING A ROUTINE AUDIT
5. Court action brought in:
 Federal Court State Court Foreign Court Other:
A. Name of Court (Federal, State, Foreign or Other):
CONTRA COSTA COUNTY COURT
B. Location of Court (City or County and State or Country):
PITTSBURG CA
C. Docket/Case#:
2015026579900
 Check this box if the Docket/Case# is your SSN, a Bank Card number, or a Personal Identification Number.
6. Is Judgment/Lien Outstanding?
 Yes No
If "No", complete item 7. If "Yes", skip to item 8.
7. If Judgment/Lien is not outstanding, provide:
A. Status Date (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
B. How was matter resolved? (select appropriate item):
 Discharged Released Removed Satisfied
8. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the action as well as the current status or final disposition. Your information must fit within the space provided.
REP WAS UNAWARE THAT THIS TURNED INTO A LIEN. HAD BEEN WORKING WITH IRS FOR MANY YEARS. CURRENTLY WORKING FOR A RESOLUTION LETTER FROM IRS. ***1/15/2015 Docket/Case #2015000739500 was inadvertently left off and is part of this disclosure*** REPORTED 2015000739500 ERRONEOUSLY COMBINED, REMOVED AND REPORTED ON SEPARATE DRP***

This Disclosure Reporting Page is an INITIAL or AMENDED response to report details for affirmative response(s) to Question(s) 14M on Form U4; Check the question(s) you are responding to, regardless of whether you are answering the question(s) "yes" or amending the answer(s) to "no":

14M

[Click here to view question text](#)

If multiple, unrelated events result in the same affirmative answer, details must be provided on separate DRPs.

1. Judgment/Lien Amount:
\$ 31,464.00
2. Judgment/Lien Holder:
State of California
3. Judgment/Lien Type:
 Civil Tax
4. A. Date Filed with Court (MM/DD/YYYY):
10/05/2016 Exact Explanation
If not exact, provide explanation:
B. Date individual learned of the Judgment/Lien (MM/DD/YYYY):
10/03/2017 Exact Explanation
If not exact, provide explanation:
On, or about 10/3/2017, SII ran a credit report which identified this previously unreported lien.
5. Court action brought in:
 Federal Court State Court Foreign Court Other:
A. Name of Court (Federal, State, Foreign or Other):
RECORDER OF DEEDS
B. Location of Court (City or County and State or Country):
Martinez, CA
C. Docket/Case#:
16020732500
 Check this box if the Docket/Case# is your SSN, a Bank Card number, or a Personal Identification Number.
6. Is Judgment/Lien Outstanding?
 Yes No
If "No", complete item 7. If "Yes", skip to item 8.
7. If Judgment/Lien is not outstanding, provide:
A. Status Date (MM/DD/YYYY):

ADL000046

Exact Explanation

If not exact, provide explanation:

B. How was matter resolved? (select appropriate item):

Discharged Released Removed Satisfied

8. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the action as well as the current status or final disposition. Your information must fit within the space provided.

This Disclosure Reporting Page is an INITIAL or AMENDED response to report details for affirmative response(s) to Question(s) 14M on Form U4; Check the question(s) you are responding to, regardless of whether you are answering the question(s) "yes" or amending the answer(s) to "no":

14M

[Click here to view question text](#)

If multiple, unrelated events result in the same affirmative answer, details must be provided on separate DRPs.

1. Judgment/Lien Amount:
\$ 58,354.00

2. Judgment/Lien Holder:
STATE OF CALIFORNIA

3. Judgment/Lien Type:
 Civil Tax

4. A. Date Filed with Court (MM/DD/YYYY):

01/15/2015 Exact Explanation

If not exact, provide explanation:

B. Date individual learned of the Judgment/Lien (MM/DD/YYYY):

09/26/2016 Exact Explanation

If not exact, provide explanation:

In the course of a FINRA exam, a credit report was run on 9/28/2016 which showed the state tax lien.

5. Court action brought in:

Federal Court State Court Foreign Court Other:

A. Name of Court (Federal, State, Foreign or Other):

STATE OF CALIFORNIA

B. Location of Court (City or County and State or Country):

Martinez, CA

C. Docket/Case#:

15000739500

Check this box if the Docket/Case# is your SSN, a Bank Card number, or a Personal Identification Number.

6. Is Judgment/Lien Outstanding?

Yes No

If "No", complete item 7. If "Yes", skip to item 8.

7. If Judgment/Lien is not outstanding, provide:

A. Status Date (MM/DD/YYYY):

Exact Explanation

If not exact, provide explanation:

B. How was matter resolved? (select appropriate item):

Discharged Released Removed Satisfied

8. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the action as well as the current status or final disposition. Your information must fit within the space provided.

This state tax lien was erroneously combined, and previously disclosed, with a separate federal tax lien. The occurrence number for this prior disclosure is #1905605. This disclosure is being made to correct that error and separate the two liens.

This Disclosure Reporting Page is an INITIAL or AMENDED response to report details for affirmative response(s) to Question(s) 14J on Form U4; Check the question(s) you are responding to, regardless of whether you are answering the question(s) "yes" or amending the answer(s) to "no":

14J(1)

14J(2)

14J(3)

[Click here to view question text](#)

One event may result in more than one affirmative answer to the above items. Use only one DRP to report details related to the same termination. Use a separate DRP for each termination reported.

1. Firm Name:
SII INVESTMENTS, INC.

2. Termination Type:
Discharged

3. Termination Date:
12/07/2017 Exact Explanation
If not exact, provide explanation:

4. Allegation(s):
TERMINATION BASED UPON FAILURE TO DISCLOSE TAX LIENS AND UPDATE FORM U4, AND USE OF UNAPPROVED EMAIL.

5. Product Type(s): (select all that apply)

No Product

Annuity-Charitable

Annuity-Fixed

Annuity-Variable

Banking Products (other than CDs)

CD

Commodity Option

Debt-Asset Backed

Debt-Corporate

Derivative

Direct Investment-DPP & LP Interests

Equipment Leasing

Equity Listed (Common & Preferred Stock)

Equity-OTC

Futures Commodity

Futures-Financial

Index Option

Insurance

Mutual Fund

Oil & Gas

Options

Penny Stock

Prime Bank Instrument

Promissory Note

Real Estate Security

Security Futures

Unit Investment Trust

ADL000047

- Debt-Government
- Debt-Municipal

- Investment Contract
- Money Market Fund

- Viatical Settlement
- Other:

6. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the termination. Your information must fit within the space provided.

This Disclosure Reporting Page is an INITIAL or AMENDED response to report details for affirmative response(s) to Question(s) 7F on Form U-5; Check the question(s) you are responding to, regardless of whether you are answering the question(s) "yes" or amending the answer(s) to "no":

7F(1)

7F(2)

7F(3)

[Click here to view question text](#)

One event may result in more than one affirmative answer to the above items. Use only one DRP to report details related to the same termination.

1. Firm Name:
SII INVESTMENTS
2. Termination Type:
Discharged
3. Termination Date:
12/07/2017 Exact Explanation
If not exact, provide explanation:
4. Allegation(s):
REP FAILED TO DISCLOSE TAX LIENS AND UPDATE FORM U4, AND USED UNAPPROVED EMAIL
5. Product Type(s): (select all that apply)

<input checked="" type="checkbox"/> No Product	<input type="checkbox"/> Derivative	<input type="checkbox"/> Mutual Fund
<input type="checkbox"/> Annuity-Charitable	<input type="checkbox"/> Direct Investment-DPP & LP Interests	<input type="checkbox"/> Oil & Gas
<input type="checkbox"/> Annuity-Fixed	<input type="checkbox"/> Equipment Leasing	<input type="checkbox"/> Options
<input type="checkbox"/> Annuity-Variable	<input type="checkbox"/> Equity Listed (Common & Preferred Stock)	<input type="checkbox"/> Penny Stock
<input type="checkbox"/> Banking Products (other than CDs)	<input type="checkbox"/> Equity-OTC	<input type="checkbox"/> Prime Bank Instrument
<input type="checkbox"/> CD	<input type="checkbox"/> Futures Commodity	<input type="checkbox"/> Promissory Note
<input type="checkbox"/> Commodity Option	<input type="checkbox"/> Futures-Financial	<input type="checkbox"/> Real Estate Security
<input type="checkbox"/> Debt-Asset Backed	<input type="checkbox"/> Index Option	<input type="checkbox"/> Security Futures
<input type="checkbox"/> Debt-Corporate	<input type="checkbox"/> Insurance	<input type="checkbox"/> Unit Investment Trust
<input type="checkbox"/> Debt-Government	<input type="checkbox"/> Investment Contract	<input type="checkbox"/> Viatical Settlement
<input type="checkbox"/> Debt-Municipal	<input type="checkbox"/> Money Market Fund	<input type="checkbox"/> Other:

6. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the termination. Your information must fit within the space provided.

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Archived Disclosure Events

This Disclosure Reporting Page is an INITIAL or AMENDED response to report details for affirmative responses to Items 23K(1), 23K(2) and 23K(3) on page 3 of Form U-4; Check item(s) you are responding to:

23K(1)

23K(2)

23K(3)

If events result in affirmative answers to both 23K(1) and 23K(2), details to each must be provided on separate DRPs.

1. Action Type:
Bankruptcy
2. Action Date (MM/DD/YYYY):
01/01/1993 Exact Explanation
If not exact, provide explanation:
3. If the financial action relates to an organization over which you exercise(d) control, enter Organization Name and your position, title or relationship:

Was the Organization investment-related? Yes No
4. Court action brought in (Name of Federal, State or Foreign Court), Location of Court (City or County and State or Country), Docket/Case Number and Bankruptcy Chapter Number (if Federal Bankruptcy Filing):
SELF Not Provided PERSONAL BANKRUPTCY
5. Is action currently pending? Yes No
6. If not pending, provide Disposition Type:
Discharged
7. Disposition Date (MM/DD/YYYY):
08/01/1993 Exact Explanation
If not exact, provide explanation:
8. Provide a brief summary of events leading to the action and if not discharged, explain. (Your information must fit within the space provided.):
NO ALLEGATIONS-SELF INITIATED PERSONAL BANKRUPTCY
9. If a SIPA trustee was appointed or a direct payment procedure was begun, enter the amount paid or agreed to be paid by you; or the name of the trustee:

Currently Open? Yes No

Date Direct Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY):

Exact Explanation

If not exact, provide explanation:

10. Provide details to any status/disposition. Include details as to creditors, terms, conditions, amounts due and settlement schedule (if applicable). (Your information must fit within the space provided.):
DISCHARGED Not Provided

This Disclosure Reporting Page is an INITIAL OR AMENDED response to report details for affirmative response to Question 14I on Form U4;

Check question(s) you are responding to:

14I(1)(a)

14I(1)(b)

14I(1)(c)

14I(2)

14I(3)(a)

14I(3)(b)

One event may result in more than one affirmative answer to the above items. Use only one DRP to report details related to one customer complaint/arbitration/civil litigation. Use a separate DRP for each customer complaint/arbitration/civil litigation.

DRP Instructions:

- * In all matters (i.e., customer complaints, arbitrations/CFTC reparations, civil litigations), complete items 1-6.
- * If the matter involves only a customer complaint, also complete items 7-12, as appropriate.
- * If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.
- * If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.
- * If the matter involves a civil litigation, complete items 20-27.
- * Item 28 is an optional field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation).

Complete items 1-6 for all events.

1. Customer Name(s):
LEO DOMINGUEZ
2. Customer(s) State of Residence:
California
Other state(s) of residence/detail:
3. Employing Firm when activities occurred which led to the complaint:
ALAMO CAPITAL INVESTMENTS
4. Allegation(s) and a brief summary of events related to the allegation(s) including dates when activities leading to the allegation(s) occurred:
CUSTOMER SAID HE HAD DEFERRED SALES CHARGES ON HIS TRANSFERRING 403(B). THE PENALTY WAS 892.59 ON A TOTAL OF 207587.67. .04% HIS RATE OF RETURN WAS INCREASED BY 6%. HE KNEW OF THE PENALTIES AND SIGNED ALL APPROPRIATE PAPERWORK
5. Principal Product Type:
Annuity(ies) - Variable
Other Product Types:
6. Alleged Compensatory Damage Amount:
\$

If the matter involves only a customer complaint, complete items 7-12, as appropriate.

7. Date Customer Complaint was received(MM/DD/YYYY):
01/20/2000 Exact Explanation
If not exact, provide explanation:
THIS IS THE DATE ALAMO CAPITAL CONTACTED ME
8. Is the customer complaint pending? Yes No

If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.

9. If the customer complaint is not pending, provide status:
If status is settlement, complete items 11 and 12;
If status is arbitration/reparation, complete items 13-19;
If status is litigation, complete items 20-27.
 Closed/No Action Withdrawn Denied
 Settled Arbitration/Reparation Litigation
10. Status Date (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
11. Settlement Amount (if settled without arbitration, litigation or reparation):
\$
12. Individual Contribution Amount:
\$

If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.

13. Arbitration/Reparation claim filed with FINRA, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
14. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
15. Is arbitration/reparation pending? Yes No
16. If the arbitration is not pending, what was the disposition?
17. Disposition Date (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
18. Amount of Monetary Compensation (award, settlement, reparation amount):
\$
19. Individual Contribution Amount:
\$

If the matter involves a civil litigation, complete items 20-27.

20. Court that case was filed in (include name of Federal, Military, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case number).

ADL000049

21. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:
22. Is the civil litigation pending? Yes No
23. If the civil litigation is not pending, what was the disposition?
24. Disposition Date (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:
25. Amount of Monetary Compensation (judgment, resbution, settlement amount):
 \$
26. Individual Contribution Amount:
 \$
27. If the action is currently on appeal enter date appeal filed (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:
28. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the customer complaint, arbitration/CFTC reparation and/or civil litigation as well as the current status or final disposition(s). Your information must fit within the space provided.

This Disclosure Reporting Page (DRP U-5) is an INITIAL OR AMENDED response to report details for affirmative response to Items 18(A), 18(B) and 18(C) of Form U-5;

Check item(s) being responded to:

18A(1) 18A(2) 18A(3) 18B 18C(1) 18C(2)

One event may result in more than one affirmative answer to the above items. Use only one DRP to report all the details related to one customer complaint. Use a separate DRP for each customer complaint.

1. Customer Name(s):
DANIEL SIENES LEONARDO DOMINGUEZ
2. Customer(s) State of Residence:
California
Other state(s) of residence/detail:
3. Employing Firm when activities occurred which led to the complaint:
ALAMO CAPITAL
4. Date Complaint was received (MM/DD/YYYY):
12/29/1999 Exact Explanation
If not exact, provide explanation:
5. Allegation(s) and a brief summary of events related to the allegation(s) including dates when activities leading to the allegation(s) occurred:
SEE UNDER INTERNAL REVIEW DRP.
6. Principal Product Type:
Annuity(ies) - Variable
Other Product Types:
7. Alleged Compensatory Damage Amount: \$
8. Is complaint pending? Yes No
9. If the complaint is not pending, provide status:
 If status is settlement, complete questions 11 and 12;
 If status is arbitration/reparation, complete questions 13-19;
 If status is litigation, complete questions 20-27. Complete question 28 for all statuses.
 No Action Withdrawn Denied
 Settled Arbitration/Reparation Litigation
10. Resolution Date(MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:

11. Settlement Amount (If settled without Arbitration, Litigation or Reparation): \$
12. Individual Contribution Amount: \$

IF ARBITRATION OR CFTC REPARATION

13. Arbitration/Reparation claim filed with (NASD, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
14. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:
15. Is arbitration/reparation pending? Yes No
16. If the arbitration/reparation is not pending, what was the disposition?
17. Disposition Date (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:
18. Amount of Monetary Compensation (award, settlement, reparation amount): \$
19. Individual Contribution Amount: \$

IF CIVIL LITIGATION

20. Court that case was filed in (include name of Federal, Military, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case number).
21. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation

If not exact, provide explanation:

- 22. Is the civil litigation pending? Yes No
- 23. If the civil litigation is not pending, what was the disposition?
- 24. Disposition Date (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:
- 25. Amount of Monetary Compensation (Judgment, restitution, settlement amount): \$
- 26. Individual Contribution Amount: \$
- 27. If the action is currently on appeal enter date appeal filed (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:
- 28. Provide details as to dispositions, including any limits or conditions. (Your information must fit within the space provided.)

This Disclosure Reporting Page is an INITIAL OR AMENDED response to report details for affirmative response to Question 14I on Form U4;

Check question(s) you are responding to:

- 14I(1)(a)
 14I(1)(b)
 14I(1)(c)
 14I(2)
 14I(3)(a)
 14I(3)(b)

One event may result in more than one affirmative answer to the above items. Use only one DRP to report details related to one customer complaint/arbitration/civil litigation. Use a separate DRP for each customer complaint/arbitration/civil litigation.

DRP Instructions:

- * In all matters (i.e., customer complaints, arbitrations/CFTC reparations, civil litigations), complete items 1-6.
- * If the matter involves only a customer complaint, also complete items 7-12, as appropriate.
- * If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.
- * If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.
- * If the matter involves a civil litigation, complete items 20-27.
- * Item 28 is an optional field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation).

Complete items 1-6 for all events.

- 1. Customer Name(s):
DANIEL SIENES
- 2. Customer(s) State of Residence:
California
Other state(s) of residence/detail:
- 3. Employing Firm when activities occurred which led to the complaint:
ALAMO CAPITAL
- 4. Allegation(s) and a brief summary of events related to the allegation(s) including dates when activities leading to the allegation(s) occurred:
CUSTOMER SENT A LETTER TO ALAMO CAPITAL STATING HE COULD NOT WITHDRAW MANDATORY IRA DIST FROM NEW V/A. HE ALLEGED I USED MISLEADING PROACTICES. I FILED A RESPONSE TO ALAMO. V/A CONTRACT WAS REVERSED PER ALAMO, IN 02/2000.
- 5. Principal Product Type:
Annuity(ies) - Variable
Other Product Types:
- 6. Alleged Compensatory Damage Amount:
\$

If the matter involves only a customer complaint, complete items 7-12, as appropriate.

- 7. Date Customer Complaint was received(MM/DD/YYYY):
01/10/2000 Exact Explanation
 If not exact, provide explanation:
DATE WHICH I WAS CONTACTED BY ALAMO CAPITAL
- 8. Is the customer complaint pending? Yes No

If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.

- 9. If the customer complaint is not pending, provide status:
 If status is settlement, complete items 11 and 12;
 If status is arbitration/reparation, complete items 13-19;
 If status is litigation, complete items 20-27.
 Closed/No Action Withdrawn Denied
 Settled Arbitration/Reparation Litigation
- 10. Status Date (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:
- 11. Settlement Amount (If settled without arbitration, litigation or reparation):
\$
- 12. Individual Contribution Amount:
\$

If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.

- 13. Arbitration/Reparation claim filed with FINRA, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
- 14. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:
- 15. Is arbitration/reparation pending? Yes No
- 16. If the arbitration is not pending, what was the disposition?

17. Disposition Date (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:
18. Amount of Monetary Compensation (award, settlement, reparation amount):
 \$
19. Individual Contribution Amount:
 \$
- If the matter involves a civil litigation, complete Items 20-27.**
20. Court that case was filed in (include name of Federal, Military, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case number).
21. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:
22. Is the civil litigation pending? Yes No
23. If the civil litigation is not pending, what was the disposition?
24. Disposition Date (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:
25. Amount of Monetary Compensation (judgment, restitution, settlement amount):
 \$
26. Individual Contribution Amount:
 \$
27. If the action is currently on appeal enter date appeal filed (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:
28. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the customer complaint, arbitration/CFTC reparation and/or civil litigation as well as the current status or final disposition(s). Your information must fit within the space provided.

This Disclosure Reporting Page is an INITIAL OR AMENDED response to report details for affirmative response to **Question 14I** on Form U4;

Check question(s) you are responding to:

14I(1)(a) 14I(1)(b) 14I(1)(c) 14I(2) 14I(3)(a) 14I(3)(b)

One event may result in more than one affirmative answer to the above items. Use only one DRP to report details related to one customer complaint/arbitration/civil litigation. Use a separate DRP for each customer complaint/arbitration/civil litigation.

DRP Instructions:

- In all matters (i.e., customer complaints, arbitrations/CFTC reparations, civil litigations), complete items 1-6.
- If the matter involves only a customer complaint, also complete items 7-12, as appropriate.
- If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.
- If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.
- If the matter involves a civil litigation, complete items 20-27.
- Item 28 is an optional field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation).

Complete items 1-6 for all events.

1. Customer Name(s):
VIOLET BRAITHWAITE
2. Customer(s) State of Residence:
North Carolina
Other state(s) of residence/detail:
3. Employing Firm when activities occurred which led to the complaint:
SECURITIES SERVICE NETWORK, INC.
4. Allegation(s) and a brief summary of events related to the allegation(s) including dates when activities leading to the allegation(s) occurred:
CLIENT ALLEGES THAT, "TIM DID NOT COMMUNICATE WITH ME ABOUT MY ACCOUNT... I WAS NEVER ADVISED OF THE INVESTMENT STRATEGY INVESTMENTS MADE ON MY ACCOUNT WERE DONE WITH OUT MY APPROVAL AND WERE UNAUTHORIZED." THE INVESTMENTS AT ISSUE OCCURRED BETWEEN 2006-2008.
5. Principal Product Type:
Mutual Fund(s)
Other Product Types:
6. Alleged Compensatory Damage Amount:
\$ 5,000.00

If the matter involves only a customer complaint, complete items 7-12, as appropriate.

7. Date Customer Complaint was received (MM/DD/YYYY):
09/22/2008 Exact Explanation
If not exact, provide explanation:
8. Is the customer complaint pending? Yes No

If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.

9. If the customer complaint is not pending, provide status:
 If status is settlement, complete items 11 and 12;
 If status is arbitration/reparation, complete items 13-19;
 If status is litigation, complete items 20-27.
 Closed/No Action Withdrawn Denied
 Settled Arbitration/Reparation Litigation
10. Status Date (MM/DD/YYYY):
10/03/2008 Exact Explanation
If not exact, provide explanation:
11. Settlement Amount (if settled without arbitration, litigation or reparation):
 \$

ADL000052

12. Individual Contribution Amount:
\$

If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.

13. Arbitration/Reparation claim filed with FINRA, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:

14. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

15. Is arbitration/reparation pending? Yes No

16. If the arbitration is not pending, what was the disposition?

17. Disposition Date (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

18. Amount of Monetary Compensation (award, settlement, reparation amount):
\$

19. Individual Contribution Amount:
\$

If the matter involves a civil litigation, complete items 20-27.

20. Court that case was filed in (include name of Federal, Military, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case number).

21. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

22. Is the civil litigation pending? Yes No

23. If the civil litigation is not pending, what was the disposition?

24. Disposition Date (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

25. Amount of Monetary Compensation (Judgment, restitution, settlement amount):
\$

26. Individual Contribution Amount:
\$

27. If the action is currently on appeal enter date appeal filed (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

28. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the customer complaint, arbitration/CFTC reparation and/or civil litigation as well as the current status or final disposition(s). Your information must fit within the space provided.
BROKER'S RECORDS REFLECT NUMEROUS MEETING AT CONTACT'S DURING WHICH CLIENTS INVESTMENTS WERE DISCUSSED. NO COMPENSATORY DAMAGE CLAIM IS MADE BUT A GOOD FAITH DETERMINATION MADE BY THE FIRM THAT DAMAGES COULD EXCEED \$5,000 DICTATES THE REPORTING OF THIS COMPLAINT.

This Disclosure Reporting Page is an INITIAL OR AMENDED response to report details for affirmative response to Questions 7(E)(1), 7(E)(2) and 7(E)(3) on Form US :

Check question(s) you are responding to:

7(E)(1)(a)

7(E)(1)(b)

7(E)(1)(c)

7(E)(2)

7(E)(3)(a)

7(E)(3)(b)

One event may result in more than one affirmative answer to the above items. Use only one DRP to report details related to one customer complaint/arbitration/civil litigation. Use a separate DRP for each customer complaint/arbitration/civil litigation.

DRP Instructions:

- In all matters (i.e., customer complaints, arbitrations/CFTC reparations, civil litigations), complete items 1-6.
- If the matter involves only a customer complaint, also complete items 7-12, as appropriate.
- If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.
- If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.
- If the matter involves a civil litigation, complete items 20-27.
- Item 28 is an optional field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation).

Complete items 1-6 for all events.

1. Customer Name(s):
VIOLET BRAITHWAITE

2. Customer(s) State of Residence:
North Carolina
Other state(s) of residence/detail:

3. Employing Firm when activities occurred which led to the complaint:
SECURITIES SERVICE NETWORK, INC.

4. Allegation(s) and a brief summary of events related to the allegation(s) including dates when activities leading to the allegation(s) occurred:
CLIENT ALLEGES THAT, "TIM DID NOT COMMUNICATE WITH ME ABOUT MY ACCOUNT...I WAS NEVER ADVISED OF THE INVESTMENT STRATEGY...INVESTMENTS MADE ON MY ACCOUNT WERE DONE WITHOUT MY APPROVAL AND WERE UNAUTHORIZED." THE INVESTMENTS AT ISSUE OCCURRED BETWEEN 2006-2008

5. Principal Product Type:
Mutual Fund(s)
Other Product Types:

6. Alleged Compensatory Damage Amount:
\$ 5,000.00

If the matter involves only a customer complaint, complete items 7-12, as appropriate.

7. Date Customer Complaint was received(MM/DD/YYYY):
09/22/2008 Exact Explanation
If not exact, provide explanation:

8. Is the customer complaint pending? Yes No

If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.

ADL000053

9. If the customer complaint is not pending, provide status:
 If status is settlement, complete items 11 and 12;
 If status is arbitration/reparation, complete items 13-19;
 If status is litigation, complete items 20-27.

Closed/No Action Withdrawn Denied
 Settled Arbitration/Reparation Litigation

10. Status Date (MM/DD/YYYY):
 10/03/2008 Exact Explanation
 If not exact, provide explanation:

11. Settlement Amount (if settled without arbitration, litigation or reparation):
 \$

12. Individual Contribution Amount:
 \$

If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.

13. Arbitration/Reparation claim filed with FINRA, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:

14. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:

15. Is arbitration/reparation pending? Yes No

16. If the arbitration is not pending, what was the disposition?

17. Disposition Date (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:

18. Amount of Monetary Compensation (award, settlement, reparation amount):
 \$

19. Individual Contribution Amount:
 \$

If the matter involves a civil litigation, complete items 20-27.

20. Court that case was filed in (include name of Federal, Military, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case number).

21. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:

22. Is the civil litigation pending? Yes No

23. If the civil litigation is not pending, what was the disposition?

24. Disposition Date (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:

25. Amount of Monetary Compensation (Judgment, restitution, settlement amount):
 \$

26. Individual Contribution Amount:
 \$

27. If the action is currently on appeal enter date appeal filed (MM/DD/YYYY):
 Exact Explanation
 If not exact, provide explanation:

28. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the customer complaint, arbitration/CFTC reparation and/or civil litigation as well as the current status or final disposition(s). Your information must fit within the space provided.
 BROKER'S RECORDS REFLECT NUMEROUS MEETING AT CONTACTS DURING WHICH CLIENTS INVESTMENTS WERE DISCUSSED. NO COMPENSATORY DAMAGE CLAIM IS MADE BUT A GOOD FAITH DETERMINATION MADE BY THE FIRM THAT DAMAGES COULD EXCEED \$5,000 DICTATES THE REPORTIN OF THIS COMPLAINT

This Disclosure Reporting Page is an INITIAL OR AMENDED response to report details for affirmative response to Question 14I on Form U4;

Check question(s) you are responding to:

14I(1)(a) 14I(1)(b) 14I(1)(c) 14I(2) 14I(3)(a) 14I(3)(b)

One event may result in more than one affirmative answer to the above items. Use only one DRP to report details related to one customer complaint/arbitration/civil litigation. Use a separate DRP for each customer complaint/arbitration/civil litigation.

DRP Instructions:

- In all matters (i.e., customer complaints, arbitrations/CFTC reparations, civil litigations), complete items 1-6.
- If the matter involves only a customer complaint, also complete items 7-12, as appropriate.
- If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.
- If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.
- If the matter involves a civil litigation, complete items 20-27.
- Item 28 is an optional field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation).

Complete items 1-6 for all events.

- Customer Name(s):
RICHARD GONZALES
- Customer(s) State of Residence:
California
Other state(s) of residence/detail:
- Employing Firm when activities occurred which led to the complaint:
SECURITIES SERVICE NETWORK, INC.
- Allegation(s) and a brief summary of events related to the allegation(s) including dates when activities leading to the allegation(s) occurred:
CLIENT ALLEGES THAT "CMO BOND INVESTED ON 07/09/2008 FOR \$100K WAS NOT APPROVED FOR PURCHASE PRIOR TO MY KNOWLEDGE..."
- Principal Product Type:
Debt - Asset Backed

ADL000054

Other Product Types:

6. Alleged Compensatory Damage Amount:
\$ 5,000.00

If the matter involves only a customer complaint, complete Items 7-12, as appropriate.

7. Date Customer Complaint was received(MM/DD/YYYY):
09/19/2008 Exact Explanation
If not exact, provide explanation:

8. Is the customer complaint pending? Yes No

If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing Items 9 and 10.

9. If the customer complaint is not pending, provide status:
If status is settlement, complete items 11 and 12;
If status is arbitration/reparation, complete items 13-19;
If status is litigation, complete items 20-27.

Closed/No Action
 Settled

Withdrawn
 Arbitration/Reparation

Denied
 Litigation

10. Status Date (MM/DD/YYYY):
10/03/2008 Exact Explanation
If not exact, provide explanation:

11. Settlement Amount (if settled without arbitration, litigation or reparation):
\$

12. Individual Contribution Amount:
\$

If the matter involves an arbitration or CFTC reparation, complete Items 13-19, as appropriate.

13. Arbitration/Reparation claim filed with FINRA, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:

14. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

15. Is arbitration/reparation pending? Yes No

16. If the arbitration is not pending, what was the disposition?

17. Disposition Date (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

18. Amount of Monetary Compensation (award, settlement, reparation amount):
\$

19. Individual Contribution Amount:
\$

If the matter involves a civil litigation, complete items 20-27.

20. Court that case was filed in (include name of Federal, Military, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case number).

21. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

22. Is the civil litigation pending? Yes No

23. If the civil litigation is not pending, what was the disposition?

24. Disposition Date (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

25. Amount of Monetary Compensation (judgment, restitution, settlement amount):
\$

26. Individual Contribution Amount:
\$

27. If the action is currently on appeal enter date appeal filed (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

28. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the customer complaint, arbitration/CFTC reparation and/or civil litigation as well as the current status or final disposition(s). Your information must fit within the space provided.
BROKER'S RECORDS REFLECT MEETINGS WITH CLIENT JUST PRIOR TO BOND PURCHASE. NO COMPENSATORY DAMAGE AMOUNT WAS CLAIMED BUT A GOOD FAITH DETERMINATION BY THE FIRM THAT DAMAGES COULD EXCEED \$5000 DICTATES THE REPORTING OF THIS COMPLAINT.

This Disclosure Reporting Page is an INITIAL OR AMENDED response to report details for affirmative response to Questions 7(E)(1), 7(E)(2) and 7(E)(3) on Form US :

Check question(s) you are responding to:

7(E)(1)(a)

7(E)(1)(b)

7(E)(1)(c)

7(E)(2)

7(E)(3)(a)

7(E)(3)(b)

One event may result in more than one affirmative answer to the above items. Use only one DRP to report details related to one customer complaint/arbitration/civil litigation. Use a separate DRP for each customer complaint/arbitration/civil litigation.

DRP Instructions:

- In all matters (i.e., customer complaints, arbitrations/CFTC reparations, civil litigations), complete items 1-6.
- If the matter involves only a customer complaint, also complete Items 7-12, as appropriate.
- If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.
- If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.
- If the matter involves a civil litigation, complete items 20-27.
- Item 28 is an optional field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation).

Complete items 1-6 for all events.

1. Customer Name(s):
RICHARD GONZALES

ADL000055

2. Customer(s) State of Residence:
California
Other state(s) of residence/detail:
3. Employing Firm when activities occurred which led to the complaint:
SECURITIES SERVICE NETWORK, INC.
4. Allegation(s) and a brief summary of events related to the allegation(s) including dates when activities leading to the allegation(s) occurred:
CLIENT ALLEGES THAT "CMO BOND INVESTED ON 07/09/2008 FOR \$100K WAS NOT APPROVED FOR PURCHASE PRIOR TO MY KNOWLEDGE..."
5. Principal Product Type:
Debt - Asset Backed
Other Product Types:
6. Alleged Compensatory Damage Amount:
\$ 5,000.00

If the matter involves only a customer complaint, complete items 7-12, as appropriate.

7. Date Customer Complaint was received (MM/DD/YYYY):
09/19/2008 Exact Explanation
If not exact, provide explanation:

8. Is the customer complaint pending? Yes No

If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.

9. If the customer complaint is not pending, provide status:
If status is settlement, complete items 11 and 12;
If status is arbitration/reparation, complete items 13-19;
If status is litigation, complete items 20-27.

Closed/No Action
 Settled

Withdrawn
 Arbitration/Reparation

Denied
 Litigation

10. Status Date (MM/DD/YYYY):
10/03/2008 Exact Explanation
If not exact, provide explanation:

11. Settlement Amount (if settled without arbitration, litigation or reparation):
\$

12. Individual Contribution Amount:
\$

If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.

13. Arbitration/Reparation claim filed with FINRA, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:

14. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

15. Is arbitration/reparation pending? Yes No

16. If the arbitration is not pending, what was the disposition?

17. Disposition Date (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

18. Amount of Monetary Compensation (award, settlement, reparation amount):
\$

19. Individual Contribution Amount:
\$

If the matter involves a civil litigation, complete items 20-27.

20. Court that case was filed in (include name of Federal, Military, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case number):

21. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

22. Is the civil litigation pending? Yes No

23. If the civil litigation is not pending, what was the disposition?

24. Disposition Date (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

25. Amount of Monetary Compensation (judgment, restitution, settlement amount):
\$

26. Individual Contribution Amount:
\$

27. If the action is currently on appeal enter date appeal filed (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

28. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the customer complaint, arbitration/CFTC reparation and/or civil litigation as well as the current status or final disposition(s). Your information must fit within the space provided.
BROKER'S RECORDS REFLECT MEETINGS WITH CLIENT JUST PRIOR TO BOND PURCHASE. NO COMPENSATORY DAMAGE AMOUNT WAS CLAIMED BUT A GOOD FAITH DETERMINATION BY THE FIRM THAT DAMAGES COULD EXCEED \$5000 DICTATES THE REPORTING OF THIS COMPLAINT

This Disclosure Reporting Page is an INITIAL OR AMENDED response to report details for affirmative response to Question 141 on Form U4;

Check question(s) you are responding to:

141(1)(a)

141(1)(b)

141(1)(ADL000056)

141(2)

141(3)(a)

141(3)(b)

One event may result in more than one affirmative answer to the above items. Use only one DRP to report details related to one customer complaint/arbitration/civil litigation. Use a separate DRP for each customer complaint/arbitration/civil litigation.

DRP Instructions:

- In all matters (i.e., customer complaints, arbitrations/CFTC reparations, civil litigations), complete items 1-6.
- If the matter involves only a customer complaint, also complete Items 7-12, as appropriate.
- If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.
- If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.
- If the matter involves a civil litigation, complete items 20-27.
- Item 28 is an optional field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation).

Complete items 1-6 for all events.

1. Customer Name(s):
GREG AUSLEN
2. Customer(s) State of Residence:
California
Other state(s) of residence/detail:
3. Employing Firm when activities occurred which led to the complaint:
SII INVESTMENTS, INC.
4. Allegation(s) and a brief summary of events related to the allegation(s) including dates when activities leading to the allegation(s) occurred:
CLIENT ALLEGES HE PLACED INSTRUCTIONS TO SELL MUTUAL FUNDS POSITIONS THAT WERE NOT EXECUTED TIMELY.
5. Principal Product Type:
Mutual Fund(s)
Other Product Types:
6. Alleged Compensatory Damage Amount:
\$ 15,950.00

If the matter involves only a customer complaint, complete items 7-12, as appropriate.

7. Date Customer Complaint was received(MM/DD/YYYY):
12/19/2008 Exact Explanation
If not exact, provide explanation:
8. Is the customer complaint pending? Yes No

If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.

9. If the customer complaint is not pending, provide status:
If status is settlement, complete items 11 and 12;
If status is arbitration/reparation, complete items 13-19;
If status is litigation, complete items 20-27.
 Closed/No Action Withdrawn Denied
 Settled Arbitration/Reparation Litigation
10. Status Date (MM/DD/YYYY):
01/14/2009 Exact Explanation
If not exact, provide explanation:
11. Settlement Amount (if settled without arbitration, litigation or reparation):
\$
12. Individual Contribution Amount:
\$

If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.

13. Arbitration/Reparation claim filed with FINRA, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
14. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
15. Is arbitration/reparation pending? Yes No
16. If the arbitration is not pending, what was the disposition?
17. Disposition Date (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
18. Amount of Monetary Compensation (award, settlement, reparation amount):
\$
19. Individual Contribution Amount:
\$

If the matter involves a civil litigation, complete items 20-27.

20. Court that case was filed in (include name of Federal, Military, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case number).
21. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
22. Is the civil litigation pending? Yes No
23. If the civil litigation is not pending, what was the disposition?
24. Disposition Date (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
25. Amount of Monetary Compensation (judgment, restitution, settlement amount):
\$
26. Individual Contribution Amount:
\$
27. If the action is currently on appeal enter date appeal filed (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
28. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the customer complaint, arbitration/CFTC reparation and/or civil litigation as well as the current status or final disposition(s). Your information must fit within the space provided.

This Disclosure Reporting Page is an INITIAL OR AMENDED response to report details for affirmative response to Question 14I on Form U4;

Check question(s) you are responding to:

14I(1)(a)

14I(1)(b)

14I(1)(c)

14I(2)

14I(3)(a)

14I(3)(b)

One event may result in more than one affirmative answer to the above items. Use only one DRP to report details related to one customer complaint/arbitration/civil litigation. Use a separate DRP for each customer complaint/arbitration/civil litigation.

DRP Instructions:

- * In all matters (i.e., customer complaints, arbitrations/CFTC reparations, civil litigations), complete items 1-6.
- * If the matter involves only a customer complaint, also complete items 7-12, as appropriate.
- * If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.
- * If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.
- * If the matter involves a civil litigation, complete items 20-27.
- * Item 20 is an optional field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation).

Complete items 1-6 for all events.

1. Customer Name(s):
GREGG AUSLEN
2. Customer(s) State of Residence:
California
Other state(s) of residence/detail:
3. Employing Firm when activities occurred which led to the complaint:
SII INVESTMENTS, INC.
4. Allegation(s) and a brief summary of events related to the allegation(s) including dates when activities leading to the allegation(s) occurred:
CLIENT ALLEGES THAT THREE STOCK PURCHASED IN EARLY OCTOBER 2008 WERE UNAUTHORIZED.
5. Principal Product Type:
Equity Listed (Common & Preferred Stock)
Other Product Types:
6. Alleged Compensatory Damage Amount:
\$ 10,030.00

If the matter involves only a customer complaint, complete items 7-12, as appropriate.

7. Date Customer Complaint was received(MM/DD/YYYY):
02/20/2009 Exact Explanation
If not exact, provide explanation:
8. Is the customer complaint pending? Yes No

If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing Items 9 and 10.

9. If the customer complaint is not pending, provide status:
If status is settlement, complete items 11 and 12;
If status is arbitration/reparation, complete items 13-19;
If status is litigation, complete items 20-27.
 Closed/No Action Withdrawn Denied
 Settled Arbitration/Reparation Litigation
10. Status Date (MM/DD/YYYY):
03/05/2009 Exact Explanation
If not exact, provide explanation:
11. Settlement Amount (If settled without arbitration, litigation or reparation):
\$
12. Individual Contribution Amount:
\$

If the matter involves an arbitration or CFTC reparation, complete Items 13-19, as appropriate.

13. Arbitration/Reparation claim filed with FINRA, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:
14. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation.
15. Is arbitration/reparation pending? Yes No
16. If the arbitration is not pending, what was the disposition?
17. Disposition Date (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
18. Amount of Monetary Compensation (award, settlement, reparation amount):
\$
19. Individual Contribution Amount:
\$

If the matter involves a civil litigation, complete items 20-27.

20. Court that case was filed in (include name of Federal, Military, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case number).
21. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
22. Is the civil litigation pending? Yes No
23. If the civil litigation is not pending, what was the disposition?
24. Disposition Date (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

ADL000058

25. Amount of Monetary Compensation (judgment, restitution, settlement amount):
\$
26. Individual Contribution Amount:
\$
27. If the action is currently on appeal enter date appeal filed (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
28. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the customer complaint, arbitration/CFTC reparation and/or civil litigation as well as the current status or final disposition(s). Your information must fit within the space provided.

This Disclosure Reporting Page is an INITIAL or AMENDED response to report details for affirmative response(s) to Question 141 on Form U4
Check the question(s) you are responding to, regardless of whether you are answering the question(s) "yes" or amending the answer(s) to "no":

- | | | | | |
|-----------------------------------|-----------------------------------|--|-----------------------------------|-----------------------------------|
| <input type="checkbox"/> 7E(1)(a) | <input type="checkbox"/> 7E(2)(a) | <input checked="" type="checkbox"/> 7E(3)(a) | <input type="checkbox"/> 7E(4)(a) | <input type="checkbox"/> 7E(5)(a) |
| <input type="checkbox"/> 7E(1)(b) | <input type="checkbox"/> 7E(2)(b) | <input type="checkbox"/> 7E(3)(b) | <input type="checkbox"/> 7E(4)(b) | <input type="checkbox"/> 7E(5)(b) |
| <input type="checkbox"/> 7E(1)(c) | | | | |
| <input type="checkbox"/> 7E(1)(d) | | | | |

[Click here to view question text](#)

One matter may result in more than one affirmative answer to the above items. Use a single DRP to report details relating to a particular matter (i.e., a customer complaint/arbitration/CFTC reparation/civil litigation). Use a separate DRP for each matter.

DRP Instructions:

- Complete items 1-6 for all matters (i.e., customer complaints, arbitrations/CFTC reparations and civil litigation in which a customer alleges that the individual was *involved in sales practice violations* and the individual is not named as a party, as well as arbitrations/CFTC reparations and civil litigation in which the individual is named as a party).
- If the matter involves a customer complaint, or an arbitration/CFTC reparation or civil litigation in which a customer alleges that the individual was *salesinvolved in sales practice violations* and the individual is not named as a party, complete items 7-11 as appropriate.
- If a customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.
- If the matter involves an arbitration/CFTC reparation in which the individual is a named party, complete items 12-16, as appropriate.
- If the matter involves a civil litigation in which the individual is a named party, complete items 17-23.
- Item 24 is an optional field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation).

Complete items 1-6 for all matters (i.e., customer complaints, arbitrations/CFTC reparations, civil litigation).

1. Customer Name(s):
GREGORY COLLOZZO
2. A. Customer(s) State of Residence (select "not on list" when the customer's residence is a foreign address):
New York
B. Other state(s) of residence/detail:
3. Employing Firm when activities occurred which led to the customer complaint, arbitration, CFTC reparation or civil litigation:
SECURITIES SERVICE NETWORK, INC.
4. Allegation(s) and a brief summary of events related to the allegation(s) including dates when activities leading to the allegation(s) occurred:
CLIENT ALLEGES THAT MR. SULLIVAN NEVER "ADJUSTED TO PRESERVE MY PRINCIPAL DUE TO THE DECREASING VALUE OF MY IRA ACCOUNT."
5. Product Type(s): (select all that apply)
- | | | |
|--|--|---|
| <input type="checkbox"/> No Product | <input type="checkbox"/> Derivative | <input checked="" type="checkbox"/> Mutual Fund |
| <input type="checkbox"/> Annuity-Charitable | <input type="checkbox"/> Direct Investment-DPP & LP Interests | <input type="checkbox"/> Oil & Gas |
| <input type="checkbox"/> Annuity-Fixed | <input type="checkbox"/> Equipment Leasing | <input type="checkbox"/> Options |
| <input type="checkbox"/> Annuity-Variable | <input checked="" type="checkbox"/> Equity Listed (Common & Preferred Stock) | <input type="checkbox"/> Penny Stock |
| <input type="checkbox"/> Banking Products (other than CDs) | <input type="checkbox"/> Equity-OTC | <input type="checkbox"/> Prime Bank Instrument |
| <input type="checkbox"/> CD | <input type="checkbox"/> Futures-Commodity | <input type="checkbox"/> Promissory Note |
| <input type="checkbox"/> Commodity Option | <input type="checkbox"/> Futures-Financial | <input type="checkbox"/> Real Estate Security |
| <input type="checkbox"/> Debt-Asset Backed | <input type="checkbox"/> Index Option | <input type="checkbox"/> Security Futures |
| <input type="checkbox"/> Debt-Corporate | <input type="checkbox"/> Insurance | <input type="checkbox"/> Unit Investment Trust |
| <input type="checkbox"/> Debt-Government | <input type="checkbox"/> Investment Contract | <input type="checkbox"/> Viatical Settlement |
| <input type="checkbox"/> Debt-Municipal | <input type="checkbox"/> Money Market Fund | <input type="checkbox"/> Other: |
6. Alleged Compensatory Damage Amount:
\$ 67,000.00
 Exact Explanation (If no damage amount is alleged, the complaint must be reported unless the firm has made a good faith determination that the damages from the alleged conduct would be less than \$5,000):

If the matter involves a customer complaint, arbitration/CFTC reparation or civil litigation in which a customer alleges that the individual was *involved in sales practice violations* and the individual is not named as a party, complete items 7-11 as appropriate.

Note: Report in Items 12-16, or 17-23, as appropriate, only arbitrations/CFTC reparations or civil litigation in which the individual is named as a party.

7. A. Is this an oral complaint?
 Yes No
- B. Is this a written complaint?
 Yes No
- C. Is this an arbitration/CFTC reparation or civil litigation?
 Yes No
- If yes, provide:
- i. Arbitration/reparation forum or court name and location:
- ii. Docket/Case#:
- iii. Filing date of arbitration/CFTC reparation or civil litigation (MM/DD/YYYY):
- D. Date received by/served on firm (MM/DD/YYYY):
06/04/2009 Exact Explanation
If not exact, provide explanation:
8. Is the complaint, arbitration/CFTC reparation or civil litigation pending?
 Yes No
If "No", complete item 9.

ADL000059

9. If the complaint, arbitration/CFTC reparation or civil litigation is not pending, provide status:
- Closed/No Action Withdrawn Denied Settled
- Arbitration Award/Monetary Judgment (for claimants/plaintiffs)
- Arbitration Award/Monetary Judgment (for respondents/defendants)
- Evolved into Arbitration/CFTC reparation (you are a named party)
- Evolved into Civil litigation (you are a named party)

If status is arbitration/CFTC reparation in which the individual is not a named party, provide details in item 7C.
If status is arbitration/CFTC reparation in which the individual is a named party, complete items 12-16.
If status is civil litigation in which the individual is a named party, complete items 17-23.

10. Status Date (MM/DD/YYYY):
10/31/2009 Exact Explanation
If not exact, provide explanation:

11. Settlement/Award/Monetary Judgment:
A. Settlement/Award/Monetary Judgment amount:
\$
B. Individual Contribution Amount:
\$

If the matter involves arbitration or CFTC reparation in which the individual is a named respondent, complete items 12-16, as appropriate.

12. A. Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):

B. Docket/Case#:

C. Date notice/process was served (MM/DD/YYYY):

Exact Explanation

If not exact, provide explanation:

13. Is arbitration/ CFTC reparation pending?
 Yes No

If "No", complete item 14.

14. If the arbitration/CFTC reparation is not pending, what was the disposition?
- Award to Applicant (Agent/Representative) Award to Customer Denied Dismissed
- Judgment (other than monetary) No Action Settled Withdrawn
- Other :

15. Disposition Date (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

16. Monetary Compensation Details (award, settlement, reparation amount):
A. Total Amount:
\$
B. Individual Contribution Amount:
\$

If the matter involves a civil litigation in which the individual is a defendant, complete items 17-23.

17. Court in which case was filed:
 Federal Court State Court Foreign Court Military Court Other :
- A. Name of Court:
- B. Location of Court (City or County and State or Country):
- C. Docket/Case#:

18. Date notice/process was served (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

19. Is the civil litigation pending?
 Yes No

If "No", complete item 20.

20. If the civil litigation is not pending, what was the disposition?
- Denied Dismissed Judgment (other than monetary)
- Monetary Judgment to Applicant (Agent/Representative) Monetary Judgment to Customer
- No Action Settled Withdrawn
- Other :

21. Disposition Date (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:

22. Monetary Compensation Details (Judgment, restitution, settlement amount):
A. Total Amount:
\$
B. Individual Contribution Amount:
\$

23. If action is currently on appeal:
A. Enter date appeal filed (MM/DD/YYYY):
 Exact Explanation
If not exact, provide explanation:
- B. Court appeal filed in:
 Federal Court State Court Foreign Court Military Court Other :
- i. Name of Court:
- ii. Location of Court (City or County and State or Country):
- iii. Docket/Case#:

24. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the customer complaint, arbitration/CFTC reparation and/or civil litigation as well as the current status or final disposition(s). Your information must fit within the space provided.

This Disclosure Reporting Page is an INITIAL or AMENDED response to report details for affirmative response(s) to Question 141 on Form U-4
 Check the question(s) you are responding to, regardless of whether you are answering the question(s) "yes" or amending the answer(s) to "no":

- | | | | | |
|------------------------------------|------------------------------------|---|------------------------------------|------------------------------------|
| <input type="checkbox"/> 141(1)(a) | <input type="checkbox"/> 141(2)(a) | <input checked="" type="checkbox"/> 141(3)(a) | <input type="checkbox"/> 141(4)(a) | <input type="checkbox"/> 141(5)(a) |
| <input type="checkbox"/> 141(1)(b) | <input type="checkbox"/> 141(2)(b) | <input type="checkbox"/> 141(3)(b) | <input type="checkbox"/> 141(4)(b) | <input type="checkbox"/> 141(5)(b) |
| <input type="checkbox"/> 141(1)(c) | | | | |
| <input type="checkbox"/> 141(1)(d) | | | | |

[Click here to view question text](#)

One matter may result in more than one affirmative answer to the above items. Use a single DRP to report details relating to a particular matter (i.e., a customer complaint/arbitration/CFTC reparation/civil litigation). Use a separate DRP for each matter.

DRP Instructions:

- Complete items 1-6 for all matters (i.e., customer complaints, arbitrations/CFTC reparations and civil litigation in which a customer alleges that you were involved in sales practice violations and you are not named as a party, as well as arbitrations/CFTC reparations and civil litigation in which you are named as a party).
- If the matter involves a customer complaint, or an arbitration/CFTC reparation or civil litigation in which a customer alleges that you were involved in sales practice violations and you are not named as a party, complete items 7-11 as appropriate.
- If a customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.
- If the matter involves an arbitration/CFTC reparation in which you are a named party, complete items 12-16, as appropriate.
- If the matter involves a civil litigation in which you are a named party, complete items 17-23.
- Item 24 is an optional field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation).

Complete items 1-6 for all matters (i.e., customer complaints, arbitrations/CFTC reparations, civil litigation).

- Customer Name(s):
GREGORY COLLOZZO
- A. Customer(s) State of Residence (select "not on list" when the customer's residence is a foreign address):
New York
B. Other state(s) of residence/detail:
- Employing Firm when activities occurred which led to the customer complaint, arbitration, CFTC reparation or civil litigation:
SECURITIES SERVICE NETWORK, INC.
- Allegation(s) and a brief summary of events related to the allegation(s) including dates when activities leading to the allegation(s) occurred:
CLIENT ALLEGES THAT MR. SULLIVAN NEVER "ADJUSTED TO PRESERVE MY PRINCIPAL DUE TO THE DECREASING VALUE OF MY IRA ACCOUNT."
- Product Type(s): (select all that apply)

- | | | |
|--|--|---|
| <input type="checkbox"/> No Product | <input type="checkbox"/> Derivative | <input checked="" type="checkbox"/> Mutual Fund |
| <input type="checkbox"/> Annuity-Charitable | <input type="checkbox"/> Direct Investment-DPP & LP Interests | <input type="checkbox"/> Oil & Gas |
| <input type="checkbox"/> Annuity-Fixed | <input type="checkbox"/> Equipment Leasing | <input type="checkbox"/> Options |
| <input type="checkbox"/> Annuity-Variable | <input checked="" type="checkbox"/> Equity Listed (Common & Preferred Stock) | <input type="checkbox"/> Penny Stock |
| <input type="checkbox"/> Banking Products (other than CDs) | <input type="checkbox"/> Equity-OTC | <input type="checkbox"/> Prime Bank Instrument |
| <input type="checkbox"/> CD | <input type="checkbox"/> Futures Commodity | <input type="checkbox"/> Promissory Note |
| <input type="checkbox"/> Commodity Option | <input type="checkbox"/> Futures-Financial | <input type="checkbox"/> Real Estate Security |
| <input type="checkbox"/> Debt-Asset Backed | <input type="checkbox"/> Index Option | <input type="checkbox"/> Security Futures |
| <input type="checkbox"/> Debt-Corporate | <input type="checkbox"/> Insurance | <input type="checkbox"/> Unit Investment Trust |
| <input type="checkbox"/> Debt-Government | <input type="checkbox"/> Investment Contract | <input type="checkbox"/> Volitional Settlement |
| <input type="checkbox"/> Debt-Municipal | <input type="checkbox"/> Money Market Fund | <input type="checkbox"/> Other: |

- Alleged Compensatory Damage Amount:
\$ 67,000.00
 Exact Explanation (If no damage amount is alleged, the complaint must be reported unless the firm has made a good faith determination that the damages from the alleged conduct would be less than \$5,000):

If the matter involves a customer complaint, arbitration/CFTC reparation or civil litigation in which a customer alleges that you were involved in sales practice violations and you are not named as a party, complete items 7-11 as appropriate.

Note: Report in Items 12-16, or 17-23, as appropriate, only arbitrations/CFTC reparations or civil litigation in which you are named as a party.

- Is this an oral complaint?
 Yes No
 - Is this a written complaint?
 Yes No
 - Is this an arbitration/CFTC reparation or civil litigation?
 Yes No

If yes, provide:

 - Arbitration/reparation forum or court name and location:
 - Docket/Case#:
 - Filing date of arbitration/CFTC reparation or civil litigation (MM/DD/YYYY):

D. Date received by/served on firm (MM/DD/YYYY):
06/04/2009 Exact Explanation
If not exact, provide explanation:

- Is the complaint, arbitration/CFTC reparation or civil litigation pending?
 Yes No
If "No", complete item 9.
- If the complaint, arbitration/CFTC reparation or civil litigation is not pending, provide status:
 Closed/No Action Withdrawn Denied Settled
 Arbitration Award/Monetary Judgment (for claimants/plaintiffs)
 Arbitration Award/Monetary Judgment (for respondents/defendants)
 Evolved into Arbitration/CFTC reparation (you are a named party)
 Evolved into Civil litigation (you are a named party)

If status is arbitration/CFTC reparation in which you are not a named party, provide details in item 7C.

If status is arbitration/CFTC reparation in which you are a named party, complete items 12-16.

If status is civil litigation in which you are a named party, complete items 17-23.

- Status Date (MM/DD/YYYY):
10/31/2009 Exact Explanation
If not exact, provide explanation:

- Settlement/Award/Monetary Judgment:
A. Settlement/Award/Monetary Judgment amount:

ADL000061

\$

B. Your Contribution Amount:

\$

If the matter involves arbitration or CFTC reparation in which you are a named respondent, complete items 12-16, as appropriate.

12. A. Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):

B. Docket/Case#:

C. Date notice/process was served (MM/DD/YYYY):

Exact Explanation

If not exact, provide explanation:

13. Is arbitration/ CFTC reparation pending?

Yes No

If "No", complete Item 14.

14. If the arbitration/CFTC reparation is not pending, what was the disposition?

Award to Applicant (Agent/Representative) Award to Customer Denied Dismissed
 Judgment (other than monetary) No Action Settled Withdrawn
 Other :

15. Disposition Date (MM/DD/YYYY):

Exact Explanation

If not exact, provide explanation:

16. Monetary Compensation Details (award, settlement, reparation amount):

A. Total Amount:

\$

B. Your Contribution Amount:

\$

If the matter involves a civil litigation in which you are a defendant, complete items 17-23.

17. Court in which case was filed:

Federal Court State Court Foreign Court Military Court Other :

A. Name of Court:

B. Location of Court (City or County and State or Country):

C. Docket/Case#:

18. Date notice/process was served (MM/DD/YYYY):

Exact Explanation

If not exact, provide explanation:

19. Is the civil litigation pending?

Yes No

If "No", complete Item 20.

20. If the civil litigation is not pending, what was the disposition?

Denied Dismissed Judgment (other than monetary)
 Monetary Judgment to Applicant (Agent/Representative) Monetary Judgment to Customer
 No Action Settled Withdrawn
 Other :

21. Disposition Date (MM/DD/YYYY):

Exact Explanation

If not exact, provide explanation:

22. Monetary Compensation Details (judgment, restitution, settlement amount):

A. Total Amount:

\$

B. Your Contribution Amount:

\$

23. If action is currently on appeal:

A. Enter date appeal filed (MM/DD/YYYY):

Exact Explanation

If not exact, provide explanation:

B. Court appeal filed in:

Federal Court State Court Foreign Court Military Court Other :

i. Name of Court:

ii. Location of Court (City or County and State or Country):

iii. Docket/Case#:

24. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the customer complaint, arbitration/CFTC reparation and/or civil litigation as well as the current status or final disposition(s). Your information must fit within the space provided.

This Disclosure Reporting Page is an INITIAL or AMENDED response to report details for affirmative response(s) to Question(s) 14M on Form U4; Check the question(s) you are responding to, regardless of whether you are answering the question(s) "yes" or amending the answer(s) to "no":

14M

[Click here to view question text](#)

If multiple, unrelated events result in the same affirmative answer, details must be provided on separate DRPs.

1. Judgment/Lien Amount:
\$ 164,290.00

2. Judgment/Lien Holder:

ADL000062

STATE OF CALIFORNIA FRANCHISE TAX BOARD

3. Judgment/Lien Type:
 Civil Tax
4. Date Filed (MM/DD/YYYY):
 05/10/2011 Exact Explanation
 If not exact, provide explanation:
5. Court action brought in:
 Federal Court State Court Foreign Court Other: STATE OF CALIFORNIA FRANCHISE TAX BOARD
 A. Name of Court (Federal, State, Foreign or Other):
 STATE OF CALIFORNIA
 B. Location of Court (City or County and State or Country):
 SACRAMENTO, CA
 C. Docket/Case#:
 xxx-xx-xxxx
 Check this box if the Docket/Case# is your SSN, a Bank Card number, or a Personal Identification Number.
6. Is Judgment/Lien Outstanding?
 Yes No
 If "No", complete Item 7. If "Yes", skip to item 8.
7. If Judgment/Lien is not outstanding, provide:
 A. Status Date (MM/DD/YYYY):
 06/09/2011 Exact Explanation
 If not exact, provide explanation:
 B. How was matter resolved? (select appropriate item):
 Discharged Released Removed Satisfied
8. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the action as well as the current status or final disposition. Your information must fit within the space provided.
 FIRM RECEIVED NOTICE TO WITHDRAWAL OF ORDER TO WITHHOLD TAX ON 06/09/2011.

This Disclosure Reporting Page is an INITIAL or AMENDED response to report details for affirmative response(s) to Question 14i on Form U4
 Check the question(s) you are responding to, regardless of whether you are answering the question(s) "yes" or amending the answer(s) to "no":

- | | | | | |
|------------------------------------|------------------------------------|---|------------------------------------|------------------------------------|
| <input type="checkbox"/> 14I(1)(a) | <input type="checkbox"/> 14I(2)(a) | <input checked="" type="checkbox"/> 14I(3)(a) | <input type="checkbox"/> 14I(4)(a) | <input type="checkbox"/> 14I(5)(a) |
| <input type="checkbox"/> 14I(1)(b) | <input type="checkbox"/> 14I(2)(b) | <input type="checkbox"/> 14I(3)(b) | <input type="checkbox"/> 14I(4)(b) | <input type="checkbox"/> 14I(5)(b) |
| <input type="checkbox"/> 14I(1)(c) | | | | |
| <input type="checkbox"/> 14I(1)(d) | | | | |

[Click here to view question text](#)

One matter may result in more than one affirmative answer to the above items. Use a single DRP to report details relating to a particular matter (i.e., a customer complaint/arbitration/CFTC reparation/civil litigation). Use a separate DRP for each matter.

DRP Instructions:

- Complete items 1-6 for all matters (i.e., customer complaints, arbitrations/CFTC reparations and civil litigation in which a customer alleges that you were involved in sales practice violations and you are not named as a party, as well as arbitrations/CFTC reparations and civil litigation in which you are named as a party).
- If the matter involves a customer complaint, or an arbitration/CFTC reparation or civil litigation in which a customer alleges that you were involved in sales practice violations and you are not named as a party, complete items 7-11 as appropriate.
- If a customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.
- If the matter involves an arbitration/CFTC reparation in which you are a named party, complete items 12-16, as appropriate.
- If the matter involves a civil litigation in which you are a named party, complete items 17-23.
- Item 24 is an optional field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation).

Complete Items 1-6 for all matters (i.e., customer complaints, arbitrations/CFTC reparations, civil litigation).

1. Customer Name(s):
 ARDEN SHICK
2. A. Customer(s) State of Residence (select "not on list" when the customer's residence is a foreign address):
 California
 B. Other state(s) of residence/detail:
3. Employing Firm when activities occurred which led to the customer complaint, arbitration, CFTC reparation or civil litigation:
 SII INVESTMENTS, INC
4. Allegation(s) and a brief summary of events related to the allegation(s) including dates when activities leading to the allegation(s) occurred:
 CLIENT ALLEGES SHE WAS NOT INFORMED OF TAX CONSEQUENCE UPON LIQUIDATION OF A VARIABLE ANNUITY TO PURCHASE A LIFE INSURANCE PRODUCT.
5. Product Type(s): (select all that apply)
- | | | |
|--|---|--|
| <input type="checkbox"/> No Product | <input type="checkbox"/> Derivative | <input type="checkbox"/> Mutual Fund |
| <input type="checkbox"/> Annuity-Charitable | <input type="checkbox"/> Direct Investment-DPP & LP Interests | <input type="checkbox"/> Oil & Gas |
| <input type="checkbox"/> Annuity-Fixed | <input type="checkbox"/> Equipment Leasing | <input type="checkbox"/> Options |
| <input checked="" type="checkbox"/> Annuity-Variable | <input type="checkbox"/> Equity Listed (Common & Preferred Stock) | <input type="checkbox"/> Penny Stock |
| <input type="checkbox"/> Banking Products (other than CDs) | <input type="checkbox"/> Equity-OTC | <input type="checkbox"/> Prime Bank Instrument |
| <input type="checkbox"/> CD | <input type="checkbox"/> Futures Commodity | <input type="checkbox"/> Promissory Note |
| <input type="checkbox"/> Commodity Option | <input type="checkbox"/> Futures-Financial | <input type="checkbox"/> Real Estate Security |
| <input type="checkbox"/> Debt-Asset Backed | <input type="checkbox"/> Index Option | <input type="checkbox"/> Security Futures |
| <input type="checkbox"/> Debt-Corporate | <input checked="" type="checkbox"/> Insurance | <input type="checkbox"/> Unit Investment Trust |
| <input type="checkbox"/> Debt-Government | <input type="checkbox"/> Investment Contract | <input type="checkbox"/> Viatical Settlement |
| <input type="checkbox"/> Debt-Municipal | <input type="checkbox"/> Money Market Fund | <input type="checkbox"/> Other: |

6. Alleged Compensatory Damage Amount:
 \$ 46,188.47
 Exact Explanation (If no damage amount is alleged, the complaint must be reported unless the firm has made a good faith determination that the damages from the alleged conduct would be less than \$5,000):

If the matter involves a customer complaint, arbitration/CFTC reparation or civil litigation in which a customer alleges that you were involved in sales practice violations and you are not named as a party, complete items 7-11 as appropriate.

Note: Report in Items 12-16, or 17-23, as appropriate, only arbitrations/CFTC reparations or civil litigation in which you are named as a party.

7. A. Is this an oral complaint?
 Yes No

ADL000063

B. Is this a written complaint?

Yes No

C. Is this an arbitration/CFTC reparation or civil litigation?

Yes No

If yes, provide:

i. Arbitration/reparation forum or court name and location:

ii. Docket/Case#:

iii. Filing date of arbitration/CFTC reparation or civil litigation (MM/DD/YYYY):

D. Date received by/served on firm (MM/DD/YYYY):

04/02/2015 Exact Explanation

If not exact, provide explanation:

8. Is the complaint, arbitration/CFTC reparation or civil litigation pending?

Yes No

If "No", complete item 9.

9. If the complaint, arbitration/CFTC reparation or civil litigation is not pending, provide status:

Closed/No Action Withdrawn Denied Settled

Arbitration Award/Monetary Judgment (for claimants/plaintiffs)

Arbitration Award/Monetary Judgment (for respondents/defendants)

Evolved into Arbitration/CFTC reparation (you are a named party)

Evolved into Civil litigation (you are a named party)

If status is arbitration/CFTC reparation in which you are not a named party, provide details in item 7C.

If status is arbitration/CFTC reparation in which you are a named party, complete items 12-16.

If status is civil litigation in which you are a named party, complete items 17-23.

10. Status Date (MM/DD/YYYY):

04/13/2015 Exact Explanation

If not exact, provide explanation:

11. Settlement/Award/Monetary Judgment:

A. Settlement/Award/Monetary Judgment amount:

\$

B. Your Contribution Amount:

\$

If the matter involves arbitration or CFTC reparation in which you are a named respondent, complete items 12-16, as appropriate.

12. A. Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):

B. Docket/Case#:

C. Date notice/process was served (MM/DD/YYYY):

Exact Explanation

If not exact, provide explanation:

13. Is arbitration/ CFTC reparation pending?

Yes No

If "No", complete item 14.

14. If the arbitration/CFTC reparation is not pending, what was the disposition?

Award to Applicant (Agent/Representative) Award to Customer Denied Dismissed

Judgment (other than monetary) No Action Settled Withdrawn

Other :

15. Disposition Date (MM/DD/YYYY):

Exact Explanation

If not exact, provide explanation:

16. Monetary Compensation Details (award, settlement, reparation amount):

A. Total Amount:

\$

B. Your Contribution Amount:

\$

If the matter involves a civil litigation in which you are a defendant, complete items 17-23.

17. Court in which case was filed:

Federal Court State Court Foreign Court Military Court Other :

A. Name of Court:

B. Location of Court (City or County and State or Country):

C. Docket/Case#:

18. Date notice/process was served (MM/DD/YYYY):

Exact Explanation

If not exact, provide explanation:

19. Is the civil litigation pending?

Yes No

If "No", complete item 20.

20. If the civil litigation is not pending, what was the disposition?

Denied Dismissed Judgment (other than monetary)

Monetary Judgment to Applicant (Agent/Representative) Monetary Judgment to Customer

No Action Settled Withdrawn

Other :

21. Disposition Date (MM/DD/YYYY):

Exact Explanation

If not exact, provide explanation:

22. Monetary Compensation Details (Judgment, restitution, settlement amount):

A. Total Amount:

ADL000064

\$

B. Your Contribution Amount:

\$

23. If action is currently on appeal:

A. Enter date appeal filed (MM/DD/YYYY):

Exact Explanation

If not exact, provide explanation:

B. Court appeal filed in:

Federal Court State Court Foreign Court Military Court Other :

i. Name of Court:

ii. Location of Court (City or County and State or Country):

iii. Docket/Case#:

24. Comment (Optional). You may use this field to provide a brief summary of the circumstances leading to the customer complaint, arbitration/CFTC reparation and/or civil litigation as well as the current status or final disposition(s). Your information must fit within the space provided.

CLIENT WAS ADVISED TO GET THE COST BASIS AND SEEK TAX ADVICE FROM A PROFESSIONAL BEFORE SHE SURRENDERED THE INHERITED PRODUCT. SHE WAS GIVEN A REFERRAL TO A CPA SINCE SHE DID NOT HAVE ONE. IT WAS OVER A YEAR AFTER THE EVENT THAT SHE FINALLY SPOKE WITH A TAX PERSON, WHICH I HAD RECOMMENDED SHE DO FROM THE START

EXHIBIT 2

Dotcom Bubble

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f SH

What was the 'Dotcom Bubble'

The dotcom bubble occurred in the late 1990s and was characterized by a rapid rise in equity markets fueled by investments in Internet-based companies. During the dotcom bubble, the value of equity markets grew exponentially, with the technology-dominated NASDAQ Index rising from under 1,000 to more than 5,000 between 1995 and 2000.

BREAKING DOWN 'Dotcom Bubble'

The dotcom bubble grew out of a combination of the presence of speculative or fad-based investing, the abundance of venture capital funding for startups and the failure of dotcoms to turn a profit. Investors poured money into Internet startups during the 1990s in the hope that those companies would one day become profitable, and many investors and venture capitalists abandoned a cautious approach for fear of not being able to cash in on the growing use of the Internet.

How the Dotcom Bubble Burst

The 1990s was a period of rapid technological advancement in many areas, but it was the commercialization of the Internet that led to the greatest expansion of capital growth the country had ever seen. Although high-tech standard bearers, such as Intel, Cisco, and Oracle were driving the organic growth in the technology sector, it was the upstart dotcom companies that fueled the stock market surge that began in 1995.

The bubble that formed over the next five years was fed by cheap money, easy capital, market overconfidence and pure speculation. Venture capitalists anxious to find the next big score freely invested in any company with a ".com" after its name. Valuations were based on earnings and profits that would not occur for several years if the business model actually worked, and investors were all too willing to overlook traditional fundamentals. Companies that had yet to generate revenue, profits and, in some cases, a finished product, went to market with initial public offerings that saw their stock prices triple and quadruple in one day, creating a feeding frenzy for investors.

The NASDAQ Index peaked on March 10, 2000, at 5048, nearly double over the prior year. Right at the market's peak, several of the leading high-tech companies, such as Dell and Cisco placed huge sell orders on their stocks, sparking panic selling among investors. Within a few weeks, the stock market lost 10% of its value. As investment capital began to dry up, so did the life blood of cash-strapped dotcom companies. Dotcom companies that had reached market capitalization in the hundreds of millions of dollars became worthless within a matter of months. By the end of 2001, a majority of publicly traded dotcom companies folded, and trillions of dollars of investment capital evaporated.

[Trading Center](#)

Featured Brokers

ADL000067

EXHIBIT 3

Award
NASD Dispute Resolution

In the Matter of the Arbitration Between:

William E. Harris and Antoinette Harris, Claimants v. FSC Securities Corporation, Frank A. Cuenca and Timothy C. Sullivan, Respondents

Case Number: 02-04811

Hearing Site: Seattle, Washington

REPRESENTATION OF PARTIES

For Claimants:

John A. Bender, Jr., Esq.
George Bonini, Esq.
Holland & Knight LLP
Seattle, Washington

For Respondents:

Edward Zusman, Esq.
Markun Zusman & Compton LLP
San Francisco, California

CASE INFORMATION

Statement of Claim filed: August 14, 2002

Claimants' Joint Uniform Submission Agreement signed: July 27, 2002

Joint Statement of Answer filed by Respondents FSC Securities Corporation, Frank A. Cuenca and Timothy C. Sullivan: October 29, 2002

Respondent FSC Securities Corporation's Uniform Submission Agreement signed: November 4, 2002

Respondent Frank A. Cuenca's Uniform Submission Agreement signed: October 28, 2002

Respondent Timothy C. Sullivan's Uniform Submission Agreement signed: Not signed

CASE SUMMARY

Claimants alleged unsuitability, negligence, unauthorized trading, breach of fiduciary duty, misrepresentation, non-disclosure, violations of the Washington State Securities Act, and Washington common law in the trading of mutual funds shares of Pimco Innovation B, ASAF Marsico Capital Growth Fund B, ASAF Neuberger & Berman Mid Cap Growth Fund B, Davis New York Venture B, and Putnam International Growth B.

Respondents denied the allegations of wrongdoing set forth in the Claimants' Statement of Claim and asserted affirmative defenses.

RELIEF REQUESTED

Claimants requested \$151,958.00 in compensatory damages and interest at the statutory rate of 8%.

Respondents requested dismissal of the Claimants' Statement of Claim in its entirety, attorney's fees, and costs.

OTHER ISSUES CONSIDERED AND DECIDED

Respondent Timothy C. Sullivan did not file with NASD Dispute Resolution a properly executed submission agreement but is required to submit to arbitration pursuant to the Code and having answered the claim is bound by the determination of the Panel on all issues submitted.

The parties agreed that the Award in this matter may be executed in counterpart copies or that a handwritten, signed Award may be entered.

AWARD

After considering the pleadings, testimony, and evidence presented at the hearing, the Panel decided in full and final resolution of the issues submitted for determination as follows:

- 1) Respondents FSC Securities Corporation, Frank A. Cuenca and Timothy C. Sullivan are jointly and severally liable to and shall pay Claimants the sum of \$23,927.60 in compensatory damages.
- 2) Respondents FSC Securities Corporation, Frank A. Cuenca and Timothy C. Sullivan are jointly and severally liable to and shall pay Claimants interest at a rate of 8% per annum on \$23,927.60 from May 2, 2002 until payment of this Award is made in full.
- 3) Respondents FSC Securities Corporation, Frank A. Cuenca and Timothy C. Sullivan are jointly and severally liable to and shall pay Claimants \$150.00 as reimbursement for one-half of the filing fee in this matter.
- 4) The parties shall bear their respective costs, including attorney's fees.
- 5) All other relief requested and not expressly granted is denied.

FEES

Pursuant to the Code, the following fees are assessed:

Filing Fees

NASD Dispute Resolution received or will collect the non-refundable filing fees for each claim as follows:

Initial claim filing fee = \$ 300.00

Member Fees

Member fees are assessed to each member firm that is either a party in the matter or an employer of a respondent associated person at the time of the events that gave rise to the dispute, claim, or controversy. Accordingly, the member firm FSC Securities Corporation is a party and the following fees are assessed:

Member Surcharge	= \$ 1,700.00
Pre-Hearing Process Fee	= \$ 750.00
<u>Hearing Process Fee</u>	<u>= \$ 2,750.00</u>
Total Member Fees	= \$ 5,200.00

Forum Fees and Assessments

The Panel assessed a forum fee for each pre-hearing conference or hearing session conducted. A pre-hearing conference and hearing session is any meeting between the parties and the Chair or the parties and the Panel. The following fees are assessed:

One (1) Pre-hearing conference session with the Panel @ 1,125.00/session = \$ 1,125.00
Pre-hearing conference: February 13, 2003 1 session

Four (4) Hearing sessions @ \$1,125.00/session = \$ 4,500.00
Hearings: July 15, 2003 2 sessions
July 16, 2003 2 sessions

Total Forum Fees = \$ 5,625.00

- 1) The Panel assessed \$2,812.50 of the forum fees to Claimants William E. Harris and Antoinette Harris jointly and severally.
- 2) The Panel assessed \$2,812.50 of the forum fees to Respondents FSC Securities Corporation, Frank A. Cuenca and Timothy C. Sullivan jointly and severally.

Fee Summary

1. Claimants William E. Harris and Antoinette Harris are charged jointly and severally with the following fees and costs:

Initial Filing Fee	= \$ 300.00
<u>Forum Fees</u>	= \$ 2,812.50
Total fees	= \$ 3,112.50
<u>Less payments</u>	= \$ (1,425.00)
Balance Due NASD Dispute Resolution	= \$ 1,687.50

2. Respondent FSC Securities Corporation is charged with the following fees and costs:

Member Fees	= \$ 5,200.00
<u>Less payments</u>	= \$ (5,200.00)
Balance Due NASD Dispute Resolution	= \$ 0.00

3. Respondents FSC Securities Corporation, Frank A. Cuenca and Timothy C. Sullivan are charged jointly and severally with the following fees and costs:

Forum Fees	= \$ 2,812.50
<u>Less payments</u>	= \$ 0.00
Balance Due NASD Dispute Resolution	= \$ 2,812.50

All balances are payable to NASD Dispute Resolution and are due upon the receipt of the Award pursuant to Rule 10330(g) of the Code.

ARBITRATION PANEL

<i>James L. Robart, Esq.</i>	-	<i>Non-Public Arbitrator, Presiding Chair</i>
<i>Joseph C. Roberts, Esq.</i>	-	<i>Public Arbitrator</i>
<i>Jerome O. Cohen, Esq.</i>	-	<i>Public Arbitrator</i>

Consenting Arbitrators' Signatures

JAMES L. ROBERT, ESQ.
Chair, Non-Public Arbitrator



JOSEPH C. ROBERTS, ESQ.
Public Arbitrator

Signature Date

7/31/03

Signature Date

JEROME O. COHEN, ESQ.
Public Arbitrator

Signature Date

8/1/03

Date of Service

NAED Dispute Resolution
Arbitration No. 82-04811
Award Page 5 of 5

ARBITRATION PANEL

<i>James L. Robart, Esq.</i>	-	<i>Non-Public Arbitrator, Presiding Chair</i>
<i>Joseph C. Roberts, Esq.</i>	-	<i>Public Arbitrator</i>
<i>Jerome O. Cohen, Esq.</i>	-	<i>Public Arbitrator</i>

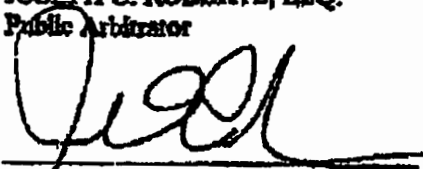
Concurring Arbitrators' Signatures

JAMES L. ROBERT, ESQ.
Chair, Non-Public Arbitrator

Signature Date

JOSEPH C. ROBERTS, ESQ.
Public Arbitrator

Signature Date



JEROME O. COHEN, ESQ.
Public Arbitrator

Signature Date

8/1/03

Signature Date

8/1/03

Date of Service

EXHIBIT 2



INVESTMENT SERVICES

FINRA - via drportal.finra.org

Answer to Statement of Claim

Claimant: Timothy Charles Sullivan

Respondent: Alamo Capital

Case # 18-01272

Submitted May 24, 2018

Relevant Facts and Available Defenses:

Tim Sullivan's association with Alamo Capital ended in Jan 2000 (Voluntary) – 18+ years ago.

His request for Arbitration now is much too late:

Per Industry code 13206: (a) Time Limitation on Submission of Claims

No claim shall be eligible for submission to arbitration under the Code where six years have elapsed from the occurrence or event giving rise to the claim.

Clients Dominguez and Siens both filed written customer complaints. Both were brought to the firm by the clients, both were based on fact and both were required to be filed with FINRA.

Ms. DeMers with the NASD Regulation Department conducted an Examination into the filing of Mr. Sullivan's U-5 by Alamo which included the Dominguez and Siens complaints. See Exam # TC E01000317 dated Jun. 16, 2000.

There were additional complaints & disclosures at all of his employing firms; which begs the question, why is he just requesting expungement of his first two employers' complaint filings?

His motivation for filing for this now is questionable at best, particularly since he is not currently Registered with any firm.

Fifteen disclosures on his record cannot be ignored and goes to a pattern of regulation violations on his part.

Mr. Sullivan's recollection of events could very easily be fuzzy and/or fabricated this many years later.

If the FINRA By-Laws state that RRs must keep their CRD registration current, then this was Tim's requirement all along and he knew it. He was aware of how to post a Broker Comment in a timely manner, as you can see from his filing history.

We do not feel that it was appropriate to combine Alamo Capital as Respondent with FSC Securities Corp, nor to disclose client details of one firm to the other firm, such as full names, age, location, occupation, net worth, product details etc.

STATEMENT OF CLAIM:

"In or around 2010, the customer dispute appeared on the Claimant's CRD record" is absolutely not true. It was filed in 2000 and has remained there since. It should not show as pending as of Alamo's filing of the U5, however after that we would have no necessity to update the U4.

"Sienes claims....are clearly erroneous, factually impossible, and false" is a false statement.

"The public disclosure of patently false allegations herein does not offer any public protection and has no regulatory value" is a completely misleading and inapplicable statement. Complaints are required to be filed by FINRA and as a result, clients and prospective clients can have Broker transparency via BrokerCheck for a reason.

"Dominguez sought compensatory damages estimated to be in excess of \$5,000" is not a true statement as all Mr. Dominguez requested was a reversal of a fee charged on a 1035 when he was assured by Mr. Sullivan that there would be none. We are unaware of any filing which estimated 5m (+) however that may have been based on a good faith determination by the firm at that time.

"Dominguez's claim....is clearly erroneous, factually impossible, and false" is a false statement. For example, let him prove that a deferred sales charge or any other claim or accusation made is "factually impossible".

"If not expunged, this customer dispute will mislead any person viewing the Claimant's CRD record and will not provide valuable information for knowledgeable decision making". This is also not true, in either of the above mentioned or any client's case, while the disclosures are being considered in light of and along with all fifteen of Tim's disclosures, as they display a pattern of behavior which a person/client may not want in a Financial Professional.

To consider now that a FINRA arbitration award finding in 2003 re the Harris complaint should be reversed and/or expunged is outrageous. The claim was for unsuitability, negligence, unauthorized trading, breach of fiduciary duty, misrepresentation & non-disclosure. It wasn't just about transferring funds from a money market into a stock fund.

Claimant's counsel's specialty is "regulatory representation for FINRA licensed Professionals" which indicates as such they would file claims based on quantity and not quality, and not particularly because they're based in fact. We believe Mr. Sullivan most likely received a solicitation from this firm and that is the impetus for this arbitration filing & nothing more.

Finra, you may feel free to contact me if you need anything else. This does not apply to Claimant or Claimant's Counsel.

**Allison Kent-Aster
Chief Compliance & Operations Officer**

EXHIBIT 3

2. **Claimant will be liable for claims upon which relief was granted.**

Dated: May 29, 2018

By



Matthew A. Wilson, Esq.
Counsel for Respondent
PAE Services Corporation
11 Exchange Place
Suite 1400
Essex, MA 01923
TEL: (978) 551-6496
Email: matthew.wilson@paeservices.com

CERTIFICATE OF NOTICE

I hereby certify that on the 25th day of May, 1911, I served R.C. Hamilton Corporation's

Statement of Answer on all parties herein through the DL Parks

Mr. D. W. K. K. K.
2412 Industrial Lane
Rich Hill
Birmingham, Colorado 80010
Attorney for Plaintiff

I hereby certify that on the 25th day of May, 1911, I served R.C. Hamilton Corporation's

Statement of Answer on all parties herein through the DL Parks

Mr. William Hamilton
Alman Capital
201 N. Olive De Soto 150
Walnut Creek, California 94596
Respondent Alman Capital



D. W. K. K. K.

EXHIBIT 4



TO: Dochter Kennedy, Esq

CC: Bradley A. Fishman, Esq.
Allison Kent-Aster, CCO

From: Michelle Vickerman
Case Administrator

Subject: FINRA Office of Dispute Resolution Arbitration Number 18-01272
Timothy Charles Sullivan vs. Alamo Capital and FSC Securities Corporation

Date: May 31, 2018

The Director of FINRA Office of Dispute Resolution determined that your request for expungement of occurrence number 1067267 in your Statement of Claim, which arises from a prior adverse Award, is not eligible for arbitration. Therefore, pursuant to the Customer Code Rule 12203(a) or Industry Code Rule 13203(a), the forum as to occurrence number 1067267 is denied. The case will proceed in this forum as to occurrence numbers 765540 and 693544.

If you have any questions, please do not hesitate to contact me at 213-229-2371 or by email at Michelle.Vickerman@finra.org.

MVV:mvv:LC53W
idr: 07/08/2016

RECIPIENTS:

Dochter Kennedy, Esq, 3400 Industrial Lane, Unit 10A, Broomfield, CO 80020
On Behalf Of: Timothy Charles Sullivan

CC:

Bradley A. Fishman, Esq., FSC Securities Corporation, 10 Exchange Place, Suite 1410, Jersey City, NJ 07302
On Behalf Of: FSC Securities Corporation

Allison Kent-Aster, CCO, Alamo Capital, 201 N Civic Dr Suite 360, Walnut Creek, CA 94596
On Behalf Of: Alamo Capital

EXHIBIT 5

Tim Sullivan
 William Rosenthal
 FINRA / SEC

7017 0190 0001 1189 2694

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Extra Services & Fees (check box, add fee as indicated)	\$0.00
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
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<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$7.45
Total Postage and Fees	\$13.65

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 City, State, ZIP+4®: **Chicago IL 60603-5104**

Postmark: 0108 04
 8102 6 2 N

06/29/2018

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
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<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$7.85
Total Postage and Fees	\$14.05

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 Street and Apt. No. or PO Box No.: **100 F Street NE**
 City, State, ZIP+4®: **Washington, D.C. 20549-5990**

Postmark: 0108 04
 8102 6 2 N

06/29/2018

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

EXHIBIT 6

INDIAN TRAIL
7765 WADSWORTH BLVD
ARVADA, CO 80005-9000
870415-7508

(800) ASK USPS
07/27/18 12:18PM

Device ID:CCQMXWXG22Y
Clerk ID:kwxxxx

Sales Receipt

Priority Mail - 2 Day
Priority Mail Flat Rate Envelope
Schd. Delivery Day Mon 07/30/18
Label #: 940551189956019/197019
Dest. ZIP: 20549
Includes \$50 Insurance
Qty: 1 @ \$6.70 \$6.70

Total Paid: \$6.70

Merchant Location: 444502365228
9
Card Number: XXXXXXXXXXXX3840
Reference ID: 820813488002
Card Type: Visa
Approval Code: 837894

CERTIFICATE OF SERVICE

I, Harris Freedman, certify that on this 23rd day of August 2018, I caused the original and three copies of Applicant's Response to FINRA's Motion to Dismiss and to Stay the Briefing Schedule in the matter of Application for Review of Timothy Charles Sullivan, Administrative Proceeding File No. 3-18617, to be served via Certified Mail on:

Brent J. Fields, Secretary
Securities and Exchange Commission
100 F St., NE
Room 10915
Washington, DC 20549-1090

and

Celia L Passaro
Assistant General Counsel
FINRA
1735 K Street, NW
Washington, DC 2006



Harris Freedman, Esq.

Attorney
AdvisorLaw LLC
3400 Industrial Lane, Unit 10A
Broomfield, CO 80020