BEFORE THE

RECEIVED AUG 2 4 2018 OFFICE OF THE SECRETARY

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,

Harr's Freedman, Esq. Attorney T: (720) 676-6151 E: Harris@advisorlawyer.com

AdvisorLaw LLC 3400 Industrial Lane, Unit 10A 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.	CASE NO.	
Respondents:	CASE NO	
Alamo Capital and FSC Securities Corporation		
STATEMENT OF CLAIM		

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 brokerdealer, 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 and a liquid net worth of approximately 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.

 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 Page 2 of 10

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.

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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 Page 8 of 10

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,

Dochtor Kennedy MBA, J.D. President & Founder T: (720) 282-5154 E: <u>Doc@advisorlawyer.com</u>

AdvisorLaw LLC 3400 Industrial Lane, Unit 10A 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

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About BrokerCheck®

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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.



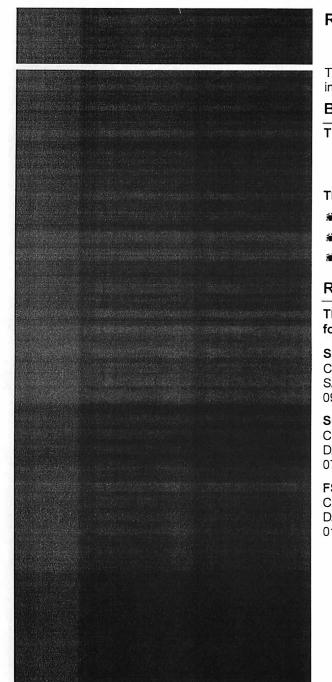


Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at

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

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

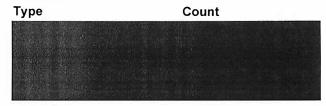
SECURITIES SERVICE NETWORK, INC. CRD# 13318 DANVILLE, CA 07/2006 - 09/2008

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:



Investment Adviser Representative Information



Broker Qualifications



User Guidance

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

Category	Date
Category	Date
Category	Date
	Category

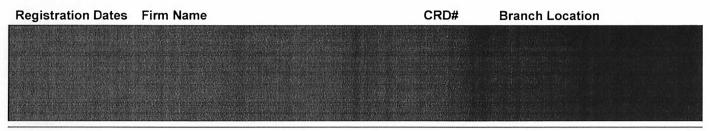
Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at www.finra.org/brokerqualifications/registeredrep/.



Registration and Employment History

Registration History

The broker previously was registered with the following firms:



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

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



User Guidance

Registration and Employment History



User Guidance

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:

- 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.

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3. Disclosure events in BrokerCheck reports come from different sources:

- 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.
- 0

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
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	ADL	000019	

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User Guidance



ADL000020



Disclosure Event Details

When evaluating this information, please keep in mind that a discloure 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.:	<u>NASD - CASE #02-04811</u>
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
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Customer Complaint Info	rmation
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

ADL000024



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		
ls 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 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		
ls 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		



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



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 ACCOUNTI WAS NEVER ADVISED OF THE INVESTMENT STRATEGYINVESTMENTS 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 Infor	mation						
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 Info	ormation
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 NUMER DURING WHICH CLIENTS INVESTMENT COMPENSATORY DAMAGE CLAIM IS M DETERMINATION MADE BY THE FIRM T

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.

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ADL000031



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 Inform	nation
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 Info	rmation
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 207587.6704% 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 Infor	mation
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

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:	Тах
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:	Тах	
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	10100025



Judgment/Lien Outstanding? Yes

Reporting Source:	Broker
Judgment/Lien Holder:	IRS
Judgment/Lien Amount:	\$278,906.00
Judgment/Lien Type:	Тах
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***



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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 Finanoal Industry Regulatory Authonty (FIIRA®), a national securities association registrated 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 other information related to registration forms and certain other information submitted on uniform Investment adviser and agent registration other information related to registration forms and certain other information 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 contact with the Securities and Exchange Commission and undertakings with NASAA and participating state regulators.

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16/2018	01/18/2018	INTERNATIONAL ASSETS (10645)	ADVISORY, LLC		Non Registered Location		No	No	Located At	390 N Orange Ave Suite 750
										Orlando, FL 32801 United States
11/2018	Present	INTERNATIONAL ASSETS	INVESTMENT	Yes	Non Registered	80 mil 34	No	No	Located At	2603 CAMINO RAMON
		MANAGEMENT, LLC (1444)	26)		Location					SUITE 200 SAN RAMON, CA 94563
	12.2.2.9							11-14-0-1-1-		United States
				State 1		N 1 18				+ 1 7x 2
1/2008	12/07/2017	SII INVESTMENTS, INC. (2	2225)	Yes	379644	10232	Yes	No	Located At	2603 CAMINO RAMON SUITE 200
										SAN RAMON, CA 94583 United States
				n sa Tanti an						
02/2008	12/07/2017	SII INVESTMENTS, INC. (2	2225)	Yes	Non Registered		No	No	Located At	2603 CAMINO RAMON
					Location					STE 200 SAN RAMON, CA 94526
										United States
02/2006	09/02/2008	SECURITIES SERVICE NET	WORK, INC. (13318)	Yes	297401	and a second	Yes	No	Located At	185 FRONT STREET
										SUITE 204 DANVILLE, CA 94526
							S. 100		1.60.14	United States
27/2006	07/24/2006	FSC SECURITIES CORPORT	ATION (7461)	Yes	286284	C2W	Yes	No	Located At	185 FRONT STREET SUITE 204
										DANVILLE, CA 94526 United States
	R NG	連續和主要相關					1 A V S.	A 21 3		
5/1999	08/01/2006	THE RETIREMENT GROUP (123102)		Non Registered		No	No	Located At	707 BROADWAY SUITE 1200
										SAN DIEGO, CA 92101 United States
		学业组织的推进 的							7 - 48 Sul ⁻¹⁹¹	States
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01/2018	PRESENT	INTERNATIONAL ASSETS INVESTMENT MANAGEME	NT, LLC SAN RAMON, CA United States	FINANCIAL ADVISOR	Yes
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08/2006	03/2009	THE RETIREMENT GROUP	SAN DIEGO, CA	INVESTMENT ADVISOR REPRESENTATIVE	Yes
A CONTRACTOR OF THE OWNER OWNER OWNER OF THE OWNER OWNE			United States		
12/1999	07/2006	FSC SECURITIES	WALNUT CREEK, CA	REGISTERED REP	Yes
41	072000	190 SEGRATES	United States		
1	STREET SHOW				
08/1997	12/1999	ALAMO CAPITAL	WALNUT CREEK, CA United States	VICE PRESIDENT REGISTERED REPS	Yes
공격은 축구					
01/1993	06/1995	SPARTAN MEDICAL CLAIMS	DANVILLE, CA	OTHER - OWNER/OPERATOR	No
			United States		and the local division of
10/1990	12/1992	TONY ROMOS OF DANVILLE	DANVILLE, CA	OTHER - GENERAL MANAGER	No
-	and the second se		United States		
	and the second	and the count of the state of the state of the second state of the			
		PROVIDIN MONARCH INSURAN AUTOMOT 8/2014 - HAYWARC CAR CLUB	G FIXED INSURANCE PRODUCTS - ADVISORS 550 MIKADO PLACE, D E PRODUCTS - OWRER SINCE 20: IVE 2035 SAN RAMON VALLEY BLVI APRROX 15 HRS/MO - NET PROFITS 0, CA 94540 - CAR CLUB - PRESIDE! 0, CA MERICA SFR REGION P.O. BO	IKADO PLACE, DANVILLE, CA 94526 - LICEN PRESIDENT SINCE 2010 - APPROX 3 HRS/MC ANVILLE, CA 94526 - LICENSED INSURANCE 3 - APPROX 3 HRS/MO - COMMISSIONS 3) TI D, SAN RAMON, CA 94583 - AUTOMOTIVE RE 4) NORTHERN CALIFORNIA CORVETTE ASSN NT SINCE 2002 - APPROX 3 HRS/MO - NO CC X 308, WILLOWS, CA 95988 - AUTO RACING X 10 HRS/MO - NO COMPENSATION	D - COMMISSIONS 2) AGENT PROVIDING FIXED S CLASSICS & PAIR - OWNER SINCE N P.O. BOX 6232, OMPENSATION 5) SPORTS
57 225472	29 Official	Result 12/11/1997 12/11/1997	Passed 72		
563 225472	27 Official	Result 12/12/1997 12/12/1997	Passed 78		
NU CANADITAN CAN					
		计多数管理器 化甲基基苯基基甲基苯基基	E EW 1881. A		
		No Ex2m A	ppointments		
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			REQUIRED	nishinnes States and	
			12/15/1997		
Cale Cale Cale	standstand of			1.10.84	
		No Current CE	Appointments		
Anniversary	3476161	6 201 REQUIRED	12/15/2017 12	/15/2017 - 04/13/2018	
12/15/2020 - 04/1	3/2021	36490307 Anniversary			
	Aviate Milandi Inte		CONTRACTOR OF CONTRACTOR		
		No CE Inac	tive History		
L					
IF THE ANSWEF	R TO ANY OF THE FOLLOW	IING QUESTIONS IS 'YES', COMPLETE DETAILS OF ALL		APPROPRIATE DRP(S)	
14A. (1) Have	YOU EVEr:	criminar	disclosure .		Yes No
		ry or noto contendere ("no contest") in a domestic, foreign, o	r military court to any felony?		0 0
	en charged with any felony				0 0
		urred while you exercised control over it, has an organi y or noio contendere ("no contest") in a domestic or foreign			0 0
	een charged with any felony				0 0
14B. (1) Have (a) be		y or noio contendere ("no contest") in a domustic, foreign or	military court to a misdemeanor in	wolving: investments or an investment-relate	Yes No ed business or O O
ar	ny fraud, false statements or	omissions, wrongful taking of property, bribery, perjury, for			2
		anor specified in 14B(1)(a)? urred while you exercised <i>control</i> over it, has an organi	zation ever:		0 0
		y or nolo contendere ("no contest") in a domestic or foreign		n 14B(1)(a)?	0 0
(b) be	en charged with a misdeme	anor specified in 14B(1)(a)?			0 0
		and the second			
		ge Commission or the Commodity Futures Trading Con	mission ever:		Yes No
	und you to have made a fals				0 0
		ed in a violation of its regulations or statutes?	to do hutineer denied ware de	muched or tests and 2	0 0
		se of an <i>investment-related</i> business having its authonization in connection with <i>investment-related</i> activity?	to to puaness denied, suspended,	revoked, or restricted?	0 0
		on you, or ordered you to cease and desist from any activity	y?		00
	the start	ADL0			00

	(6	o) 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, nule or regulation?	C	2
	(7	(a) found you to have willfully alded, abetted, counseled, commanded, induced, or procurated 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 Hunicipal Securities Rulemaking Board?	C	C
	(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?	C	C
). ()		as any other Federal regulatory agency or any state regulatory agency or foroign <i>financial regulatory authori</i> ty evers) <i>found</i> you to have made a faise statement or omission or been distonest, unlar or unethical?	Ye	'ea)
	-) found you to have been involved in a violation of invotoment-related regulation(s) or statute(s)?	0	
	(c) found you to have been a cause of an Investment-related business having its authorization to do business denied, suspended, revokod or restricted?	0	-
	(d) entered an order against you in connection with an investment-related activity?	c	。 כ
	(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?	c	c
(:	ba	ave you been subject to any <i>linal order</i> of a state securities commission (or any agency or officer performing like functions), state authority that supervises or examines inks, savings associations, or credit unions, state insurance commission (or any agency or office performing like functions), an appropriate foderal banking ogency, or the ational Credit Union Administration, that:		
	(a	b) bars you from essociation with an entity regulated by such commission, authority, agency, or officer, or from engaging in the business of securities, insurance, banking, savings association octivities, or credit union activities; or	Ċ	2
	(b) constitutes a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	C	נ
н		ny self-rogulatory organization evert) found you to have made a false statement or omission?	Ye	
	(2	c) 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)?	C	2
		 found you to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked or restricted? disciplined you by expelling or suspending you from membership, barring or suspending your association with its members, or restricting your activities? 	C	
		y disciplined you by expending or suspending you nom memoership, barring or suspending your association with its memoers, or reservicing your activities?	c c	
		1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Nunicipal Securities Rulemaking Board, or found you to have been unable to comply with any provision of such Act, rule or regulation?	-	
	(6	c) found you to have willfully alded, obstitud, 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 Hunicipal Securities Remaining Board?	C	כ
	(7	1) 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?	C	כ
н	iave ;	you ever had an authorization to act as an attornoy, accountant or federal contractor that was revoked or suspended?	c	2
H		you been notified, in writing, that you are now the subject of any:	Y	
) 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.) i) 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.)	C	
			C	ر ا
. (1		as any domestic or foreign court ever:) <i>enfolhed</i> you in connection with any <i>investment-related</i> activity?	Ye C	
	(b) found that you were involved in a violation of any investment-related statute(s) or regulation(s)?		
		· · · · · · · · · · · · · · · · · · ·	C	2
	(c) dismissed, pursuant to a settlement agreement, an investment-related civil action brought against you by a state or foreign financial regulatory authority?	0	
(;				b
	2) Ai) dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought against you by a state or foreign financial regulatory authority? re you nemed in any pending <i>investment-related</i> civil action that could result in a "yes" answer to any part of 14H(1)? ave you ever been named as a respondent/defendant in an <i>investment-related</i> , consumer-initiated arbitration or civil litigation which alleged that you were <i>involved</i> in	C	0 0
	2) Ai 1) Hi or) dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought against you by a state or foreign financial regulatory authority? re you nemed in any pending <i>investment-related</i> civil action that could result in a "yes" answer to any part of 14H(1)?	0 0 Ye	2
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	2) Ai 1) Hi or (a (b) dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought ogainst you by a state or foreign financial regulatory authority? re you nemed in any pending investment-related civil action that could result in a "yes" answer to any part of 14H(1)? are you over been named as a respondent/defendant in an <i>investment-related</i> , consumer-initiated arbitration or civil litigation which alleged that you were <i>involved</i> in ne or more <i>sales practice violations</i> and which:	0 0 9 0 0	כ כ פי
	2) Ai 1) Hi (a (b (c) dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought against you by a state or forcign financial regulatory authority? re you nemed in any pending <i>investment-related</i> civil action that could result in a "yes" answer to any part of 14H(1)? ave you ever been named as a respondent/defendant in an <i>investment-related</i> , consumer-initiated arbitration or civil litigation which alleged that you were <i>involved</i> in ne or more <i>sales practice violations</i> and which:)) is still pending, or;)) resulted in an arbitration award or civil judgment against you, regardless of amount, or;	0 0 10	
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(1	2) Au 1) Hi or (a (b (c (d 2) Hi pr (a) dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought ogainst you by a state or forcign financial regulatory authority? re you nemed in any pending <i>investment-related</i> civil action that could result in a "yes" answer to any part of 14H(1)? ave you over been named as a respondent/defendant in an <i>investment-related</i>, consumer-initiated arbitration or civil litigation which alleged that you were <i>involved</i> in ne or more sales practice violations and which:) is still pending, or;) resulted in an arbitration award or civil judgment against you, regardless of amount, or;) was settled, prior to 05/18/2009, for an amount of \$10,000 or more; or;) was settled, on or after 05/18/2009, for an amount of \$15,000 or more? 	0 7 0 0 0	
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(;	2) Ar 1) Ha or (a (b (c (d 2) Ha pr (a (b 3) W) dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought ogainst you by a state or forcign financial regulatory authority? re you nemed in any pending <i>investment-related</i> civil action that could result in a "yes" answer to any part of 14H(1)? ave you over been named as a respondent/defendant in an <i>investment-related</i>, consumer-initiated arbitration or civil litigation which alleged that you were <i>involved</i> in ne or more sales practice violations and which:) is still pending, or;) resulted in an arbitration award or civil judgment against you, regardless of amount, or;) was settled, prior to 05/18/2009, for an amount of \$10,000 or more? ave you aver been the subject of an <i>investment-related</i>, consumer-initiated (written or orel) complaint, which alleged that you were <i>involved</i> in one or more sales machine violations, and which: 		
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(: (:	2) Ai 1) Hi or (a (b (c (d (c (d (c (d (c (a) (b (c) (a) (b) (c) (a) (c) (c) (c) (c) (c) (c) (c) (c) dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought against you by a state or <i>fordign financial regulatory authority</i>? is a you nemed in any pending <i>investment-related</i> civil action that could result in a "yes" answer to any part of 14H(1)? is you ever been named as a respondent/defondant in an <i>investment-related</i>, consumer-initiated arbitration or civil litigation which alleged that you were <i>involved</i> in to or or civil stillingation which alleged that you were <i>involved</i> in the or more safes practice violations and which: is still pending, or; is still pending, or; is still pending, or; is still pending, or an anount of \$10,000 or more, or; is stilled, prior to 05/18/2009, for an amount of \$10,000 or more, or; is stilled, on or after 05/18/2009, for an amount of \$10,000 or more, or; is as settled, on or after 05/18/2009, for an amount of \$10,000 or more, or; is stilled, prior to 05/18/2009, for an amount of \$10,000 or more, or; is as settled, on or after 05/18/2009, for an amount of \$10,000 or more, or; is as settled, on or after 05/18/2009, for an amount of \$10,000 or more, or; is as settled, on or after 05/18/2009 for an amount of \$10,000 or more, or; is as settled, on or after 05/18/2009, for an amount of \$10,000 or more, or; is as settled, on or after 05/18/2009 for an amount of \$10,000 or more, or; is as settled, on or after 05/18/2009, for an amount of \$10,000 or more, or; is as settled, on or after 05/18/2009, for an amount of \$10,000 or more, or; is as settled, on or after 05/18/2009, for an amount of \$10,000 or more, or; is as settled, on or after 05/18/2009, for an amount of \$10,000 or more, or; is as settled, on or after 05/18/2009, for an amount of \$10,000 or more, or; is as settled, on or after 05/18/2009, for an amount of \$10,000 or more, or; is as		
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(; (; ,	2) Ad 1) Hi or (a (b (c (c (c (c (c (c (c (c (c (c) dismissed, pursuant to a settlement agreement, an <i>investment-related</i> cvil action brought ogainst you by a state or <i>foreign financial regulatory authority</i>? re you nemed in any pending <i>investment-related</i> cvil action that could result in a "yes" answer to any part of 14H(1)? ave you ever been named as a respondent/defendant in an <i>investment-related</i>, consumer-initiated arbitration or civil litigation which alleged that you were <i>involved</i> in ne or more sales practice violations and which:) is still pending, or;) resulted in an arbitration award or civil judgment against you, regardless of amount, or;) was settled, prior to 05/18/2009, for an amount of \$10,000 or more, or;) was settled, or a rater 05/18/2009, for an amount of \$10,000 or more, or;) was settled, or to 105/18/2009 for an amount of \$10,000 or more, or;) was settled, or to 05/18/2009 for an amount of \$10,000 or more, or;) was settled, or to 105/18/2009 for an amount of \$10,000 or more, or;) was settled, or to 105/18/2009 for an amount of \$10,000 or more, or;) was settled, or to 105/18/2009 for an amount of \$10,000 or more, or;) was settled, or or after 05/18/2009, for an amount of \$15,000 or more? Were you were <i>involved</i> in one or more sales reaction violations and contained a daim for compensatory damages of \$5,000 or more (if no damage amount is alleged, the complaint must be reported unless the <i>firm</i> has made a good faith determination that the damages from the alleged conduct would be less than \$5,000), or;) alleged that you were <i>involved</i> in one or more sales reaction violations, and which:) alleged that you were <i>involved</i> in one or more sales practice violations and contained a daim for compensatory damages of \$5,000 or more (if no damage amount is alleged, the complaint must be reported unless the <i>firm</i> has made a good faith determination that the damages from the alleged conduc		
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• (1 (1 (1 (1	2) Ai 1) Hill or (a (b (c (c) (c) (c) (c) (c) (c) (c)) dismissed, pursuent to a settlement agreement, an <i>investment-related</i> civil action brought ogainst you by a state or <i>foreign financial negulatory euthority</i>? re you ever been named as a respondent/defendant in an <i>investment-related</i>, consumer-initiated arbitration or civil litigation which alleged that you were <i>fineohead</i> in a or order states practice violations and which:) is still pending, or;) masked in an arbitration award or civil judgment against you, regardless of amount, or;) was settled, on or thor 05/18/2009, for an amount of \$10,000 or more; or;) was settled, on or after 05/18/2009, for an amount of \$10,000 or more? ave you ever been the subject of an investment-related, consumer-initiated (written or oral) compleint, which alleged that you were <i>livolved</i> in one or more sales arecter violations, and which:) was settled, on or after 05/18/2009, for an amount of \$10,000 or more;) was settled, on or after 05/18/2009 for an amount of \$10,000 or more;) was settled, prior to 05/18/2009 for an amount of \$10,000 or more;) was settled, prior to 05/18/2009 for an amount of \$10,000 or more;) was settled, prior to 05/18/2009, for an amount of \$10,000 or more;) was settled, prior to 05/18/2009, for an amount of \$10,000 or more;) was settled, use the <i>involved</i> 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 <i>involved</i> in one or more sales area or funds or solutions of \$10,000 or more, or;) alleged that you were <i>involved</i> in one or more sales area of faith detarmination of the order of \$10,000 or more;) alleged that you were <i>involved</i> in one or more sales area of faith detarmination of the set set of \$10,000 or more, or;) alleged that you were <i>involved</i> in one or more sales areactor violations and contained a		

involuntary bankrup (3) based upon events direct payment proc 14L. Has a bonding company e	tcy petition?	a broker or dealer been the subject of an involunt. on Act?	s, filed a bankruptcy petition or been the subject of an ary bankruptcy petition, or had a trustee appointed, or had a	0 0	
This Disclosure Reporting Page Is an Check item(s) you are respondin	OINITIAL OR OAMENDED response to report de	etails for affirmative responses to Items 23A and	238 on page 3 of Form U-4;		
should be reported on the same DR	P. Unrelated criminal actions, including separate cases	arising out of the same event, must be reported of	23B(2)(a) 23B(2)(b) 2ms. Multiple counts of the same charge arising out of the same on separate DRPs. ng documents) must be provided to the CRD if not previo		
 relationship. Formal Charge(s) were broug SANTA CRUZ P.D., MUNICIP/ 3. Event Disclosure Detail (U A. Date First Charged (M OS/14/1987 Ø Exact If not exact, provide e B. Event Disclosure Deta <i>Investment-related</i>): BRIBE PUBLIC OFFICE C. Did any of the Charge D. Current status of the E. Event Status Date (co OS/14/1987 Ø Exact If not exact, provide e Include for each charge, A.D E, Penalty/fine Amount and CHARGE WAS DISMISSED - must fit within the space pro- 	ght In: (Include name of Federal, Military, State or For L COURT/SANTA CROZ. S056880 se this for both organizational and individual charges. M/DD/YYYY): : OExplanation it (Include Charge(s)/Charge Description(s), and for e :R (s) within the Event Involve a Felony? OYes ONo Event? OPending Oon Appeal OFinal mplete unless status is Pending) (MM/DD/YYYY): : O Explanation Explanation: : O Explanation Explanation: : D Explanation Explanation: : D Explanation Explanation: Exp	eign Court, Location of Court - City or County <u>and</u>) ach cnarge provide: <u>1</u> number of counts, <u>2</u> <i>felony</i> , pretrial, etc.], <u>B</u> Date, <u>C</u> Sentence/Penalty, <u>D</u> G	organization was an <i>investment-related</i> business and your posi State or Country, Docket/Case number). or <i>misdemeanor</i> , <u>2</u> , plea for each charge, and <u>4</u> , product type Duration [if sentence-suspension, probation, etc.], <u>F</u> , Start Date nduct which was the subject of the charge(s) occurred. (Your i CONSTRUEO AS A BRIBE, CASE WAS A MISDEMEANOR CHARG	if charg e of Pen	ge is Naity,
This Disclosure Reporting Page is a Chack question(s) you are respo	n OINITIAL or ©AMENDED response to report de anding to:	etalls for affirmative responses to Questions 14A	and 148 on Form U4;		
should be reported on the same D Applicable court documents (L submitted. 1. If charge(s) were brought ag or relationship. 2. Formal Charge(s) were brou SANTA MONICA POLICE DEP	RP. Unrelated criminal actions, including separate case a., criminal complaint, information or indictment	es ansing out of the same event, must be reported as well as judgment of conviction or sentence trol: Enter Organization Name, whether or not the reign Court, Location of Court - City or County and	b)	iously	

	A. Date First Charged (MM/DD/YYYY): 06/17/1982 © Exact O 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 <i>Felony</i> ? O Yes O No
	D. Current status of the Event? O Pending O On Appeal O Final
	E. Event Status Date (complete unless status is Pending) (MM/DD/YYYY): 06/17/1982 @ Exact O Explanation
	If not exact, provide explanation:
i .	Disposition Disclosure Detail Include for each charge, <u>A</u> , Disposition Type [e.g., convicted, acquitted, dismissed, pretrial, etc.], <u>B</u> , Date, <u>C</u> , Sentence/Penalty, <u>D</u> . Duration [if sentence-suspension, probation, etc.], <u>E</u> , Start Date of Penalty, <u>E</u> , Penaltyfine Amount and <u>G</u> , Date Paid. \$100 FINE WHICH WAS SUSPENDED 13 MO. PROBATION MISDEMEANOR -
i.	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
	sclosure Reporting Page (DRP U-5) is an OINITIAL OR OAMENDED response to report details for affirmative responses to <i>Item 15</i> of Form U-5; Item(s) being responded to:
fthe	E15 ndividual 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.
бе	Notice Received From: (Name of firm initiating the internal review):
2.	ALAMO CAPITAL
	Date Internal review Initiated (MM/DD/YYYY): 12/29/1999 @Exact Oexplanation If not exact, provide explanation: CLIENT DANIES LSIERES WINGE COMPLAINT LETTER TO GE LIFE & ANNUITY RE HIS POLICY THAT TIM SULLIVAN SOLD HIM. CLIENT STATES TIM USED FRAUD TO SELL HIM THE POLICY.
	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. Date internal review concluded (MM/DD/YYYY):
	OExact OExplanation
	MATTER STILL PENDING RESOLUTION.
INDIV	DUAL SUBJECT MAY USE THIS SPACE FOR DETAILS TO AFFIRMATIVE ANSWERS OF ITEM 15 ONLY
	dividual 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 terminating firm or may be sent to: CRD, P.O. Box 9495 Gaithersburg, MD 20898-9495.
the second	
	sclosure Reporting Page (DRP U-5) is an OINITIAL OR OAMENDED response to report details for affirmative responses to <i>Item 15</i> of Form U-5; Item(s) being responded to:
lieci	
f the	E15 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.
d i	
ι.	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 FRDM CLIENT LEO DOMINGUEZ. CLIENT DISPUTING SURRENDER FEE CHARGED WHEN 1035 EXCHANGED A POLICY TO HARTFORD LIFE.
4.	Date Interna) review concluded (MM/DD/YYYY):
	OExact OExplanation If not exact, provide explanation: MATTER STILL PENDING.
5	
	IDUAL SUBJECT MAY USE THIS SPACE FOR DETAILS TO AFFIRMATIVE ANSWERS OF ITEM 15 ONLY
	dividual 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 CRU terminating firm or may be sent to: CRD, P.O. Box 9495 Gaithersburg, MD 20898-9495.

	sciosure Reporting Page is an OINITIAL OR GAMENDED respon	nse to report details for affirma	ative response to Question 14.	z on Form U4;	
Chec	question(s) you are responding to:				
	14I(1)(8) 014I(1)(b)	14I(1)(c)	 □ 14I(2)	🕅 14I(3)(a)	0 141(3)(b)
	ent may result in more than one affirmative answer to the above ite int/arbitration/civil litigation.	ms. Use only one DRP to repor	t details related to one custom	er complaint/arbitration/civil (litigatio	n. Use a separate DRP for each customer
	Istructions:				
	In all matters (i.e., customer complaints, arbitrations/CFTC reparation		Items 1-6.		
	If the matter involves only a customer complaint, also complete iten if the customer complaint has evolved into an arbitration/CFTC repar if the matter involves an arbitration or CFTC reparation, complete ite if the matter involves a civil itigation, complete items 20-27. Item 28 is an optional field and applies to all event types (i.e., custo	ration or civil litigation, amend ems 13-19, as appropriate.		g Items 9 and 10.	
	ete items 1-6 for all events.				
1.	Customer Name(s):				
2.	WILLIAN & ANTOINETTE MARRIS Customer(s) State of Residence:				
- .	Washington Other state(s) of residence/detail:				
_					
3.	Employing Firm when activities occurred which led to the complaint: FSC SECURITIES CORPORATION				
4.	Allegation(s) and a brief summary of events related to the allegation CLIENTS ALLEGES REPRESENTATIVE TRANSFERRED FUNDS THAT W				
5.	Principal Product Type:				
	Mutual Fund(s) Other Product Types:				
6.	Alleged Compensatory Damage Amount:				
	\$ 151,958.00				
	matter involves only a customer complaint, complete items 7	-12, as appropriate.			
7.	Date Customer Complaint was received(MM/DD/YYYY): 03/22/2002 [©] Exact [©] Explanation				
	If not exact, provide explanation:				
8.	Is the customer complaint pending? O yes O No				
	customer complaint has evolved into an arbitration/CFTC rep.	aration or civil litigation, an	nend the existing DRP by co	empleting 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 Litigation
10.	Status Date (MW/DD/YYYY): 09/27/2002 © Exact © Explanation If not exact, provide explanation:				
11.	Settlement Amount (if settled without arbitration, litigation or repara	stion):			
12.	\$ Individual Contribution Amount:				
12.	\$				
	matter involves an arbitration or CFTC reparation, complete it				
13.	Arbitration/Reparation claim filed with FINRA, AAA, NYSE, CBOE, CF NASO CASE NO. 02-04811	TC, etc.) and Docket/Case Nur	nber:		
14.	Date notice/process was served (NM/DD/YYYY): 09/27/2002 © Exact O Explanation If not exact, provide explanation:				
15.	1s arbitration/reparation pending? O Yes O No				
16.	If the arbitration is not pending, what was the disposition?				
	Award to Customer				
17.	Disposition Date (MH/DD/YYY): 08/01/2003 © Exact © Explanation If not exact, provide explanation:				
16.	Amount of Monetary Compensation (award, settlement, reparation a \$ 23,927.60	imount):			
19.	Individual Contribution Amount: \$ 5,000.00				
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 Stat	te or Country, Docket/Case number).	
21.	Date notice/process was served (MM/DD/YYYY): O Exact O Explanation				
	If not exact, provide explanation:				
22.	Is the civil litigation pending? O Yes O No				
23.	If the civil litigation is not pending, what was the disposition?				
24.	Disposition Date (MM/DD/YYYY): O Exact O Explanation				
	If not exact, provide explanation:				
25.	Amount of Monetary Compensation (judgment, restitution, settlemen \$	nt amount):			
26.	Individual Contribution Amount:		00044		
1	•	ADLO	00044		

1	If the action is currently on appeal enter date appeal filed (MM/DD/YYYY):
27.	O Exact O 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.
1.1	
This (nisclosure Reporting Page is an OINITIAL OR OAMENDED
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/YYY): 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:
0.	\$ 151,958.00
9.	Is arbitration/reparation currently pending? OyesONo
	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.
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B. How was matter resolved? (select appropriate item):

O Discharged O Released O Removed O Satisfied

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. 8. 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. ADLL000045

nis D	sclosure Reporting Page is an OINITIAL or OAMENDED response to report details for affirmative response(s) to Question(s) 14N on Form U4;
	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
	iple, unrelated events result in the same affirmative answer, details must be provided on separate DRPs. Judgment/Lien Amount:
	\$ 278,906.00
	Judgment/Lien Holder:
	Judgment/Lien Type:
	O Civil O Tax
	A. Date Filed with Court (MM/DD/YYYY):
	12/29/2015 ©Exact O Explanation If not exact, provide explanation:
	B. Date individual learned of the Judgment/Lien (MM/DD/YYYY):
	09/29/2016 O Exact @ Explanation If not exact, provide explanation:
	If not exact, provide explanation: BECAME AWARE DURING A ROUTINE AUDIT
i.	Court action brought in:
	O Federal Court O State Court O Foreign Court O 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. Is Judgment/Lien Outstanding?
	© Yes O No
	If "No", complete Item 7. If "Yes", skip to item 8.
	If Judgment/Lien is not outstanding, provide:
	A. Status Date (MM/DD/YYYY): O Exact: O Explanation
	If not exact, provide explanation:
	B. How was matter resolved? (select appropriate item):
1	O Discharged O Released O Removed O Sausfied
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multi	© Discharged © Released © Removed © Satisfied 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*** #2015000739500 was inadvertently left off and is part of this disclosure***REPORTED 2015000739500 ERRONEOUSLY COMBINED, REMOVED AND REPORTED ON SEPARATE DRP*** #2015000739500 was inadvertently left off and is part of this disclosure***REPORTED 2015000739500 ERRONEOUSLY COMBINED, REMOVED AND REPORTED ON SEPARATE DRP*** #2015000739500 was inadvertently left off and is part of this disclosure***REPORTED 2015000739500 ERRONEOUSLY COMBINED, REMOVED AND REPORTED ON SEPARATE DRP*** #2015000739500 was inadvertently left off and is part of this disclosure***REPORTED 2015000739500 ERRONEOUSLY COMBINED, REMOVED AND REPORTED ON SEPARATE DRP*** #2015000739500 was inadvertently left off and is part of this disclosure***REPORTED 2015000739500 ERRONEOUSLY COMBINED, REMOVED AND REPORTED ON SEPARATE DRP*** #2015000739500 was inadvertently left off and is part of this disclosure**** #2015000739500 was inadvertently left off and is part of the disclosure response(s) to Question(s) 14M on Form U4; the question(s) you are responding to, regardless of whether you are answering the question(s) "yes" or amending the answer(s) to "no": #214# Mick here to vitie Question left plot, here to vitie Question left plot, here to vitie Question left #31,640.00 Judgment/Uen Anount: #31,640.00 Judgment/Uen Anount: #31,640.00 Judgment/Uen Anount: #31,640.00 Judgment/Uen Anount: #31,640.00 Judgment/Uen Type: O Civil @ Tax A Date Field with Co
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multi	O Discharged O Released O Removed O Satisfied Comment (Optional). You may use this field to provide a birle summary of the circumstances leading to the action as well as the current status or final disposition. Your information must fit within the space worlded. REP WASS UMAWARE THAT THIS TURNED INTO A LEM. IADD BEEN WORKING WITH IRS FOR NAWY YEARS. CURRENTLY WORKING FOR A RESOLUTION LETTER FROM TRS. ***1/15/2015 Docket/Case * 2015000739500 was inadvertently let off and is part of this disclosure***REPORTED 2015000739500 ERRONEOUSLY COMBINED, REMOVED AND REPORTED ON SEPARATE DRP*** stolour Reporting Page is an O'INITIAL or O'AMENDED response to report details for affirmative response(s) to Question(s) 14M on Form U4; the question(s) you are responding to, repardiess of whether you are answering the question(s) "yes" or amending the answer(s) to "no": I and Cick Inter Low was distant test judgment/Lem Indide:: state O'Alforna Judgment/Lem Indide:: state O'Alforna Judgment/Lem Indide:: State O'Alforna A Date Fild with Court (MH/DD/YYY): LIOS/2016 O'EARC O'Explanation I not east, provide explanation: B. Date Individual learned of the Judgment/Lem (MM/DD/YYYY): LIOS/2016 O'EARC O'Explanation
multi	© Discharged © Released © Removed © Saudied Comment (Optiona). You may use this field to provide a bind summary of the oricumstances leading to the action as well as the current status or final disposition. Your information must fit within the Save provided. REP Was UNAWARE THAT THIS TURNED INTO A LIEM. HAD BEEN WORKING WITH IES FOR MANY YEARS. CURRENTLY WORKING FOR A RESOLUTION LETTER PROM IES. ***/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*** ********************************
mult 	O Discharged Q Released Q Removed Q Sausfied Comment (Optiona), You may use this field to provide a bind summary of the orcumstances leading to the action as well as the current status or final disposition. Your information must fit within the spectrovided. REP Was UNAWARE THAT THIS TURNED INTO A LIEM. HAD BEEN WORKING WITH IRS FOR HANY YEARS. CURRENTLY WORKING FOR A RESOLUTION LETTER FROM IRS. ***/15/2015 Docket/Case a 2015000739500 was inadvertently left off and is part of this disclosure***REPORTED 2015000739500 ERRONEOUSLY COMBINED, REMOVED AND REPORTED ON SEPARATE DRP*** Discourse Reporting Page is an Q INITIAL or Q AMENDED response to report details for affirmative response(s) to Question(s) 14M on Form U4; the question(s) you are responding to, regardless of whether you are answering the question(s) "yes" or amending the answer(s) to "no"; Leg Left Leg Left Content on the same affirmative answer, details must be provided on separate DRPs. Judgment/Lein Ansount: S 31,643.00 Judgment/Lein Ansount: S 31,643.00 Judgment/Lein Holder: State of Califorma A Date Filed with Court (MM/DD/YYYY); (1)(9)(2)(2) G Pasta Q Explanation If not exact, provide explanation If not exact, p
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multi	Concerned O Released O Removed O Sausded Comment (Optional), You may use this fired to provide a bird summary of the circumstances leading to the action as well as the current status or final disposition. Your information must fit within the Sease winked. REP MAS UNAWARE THAT THIS TURKED INTO A LEM. HAD BEEN WORKING WITH IRS FOR MAY YEARS. CURRENTLY WORKING FOR A RESOLUTION LETTER FROM IRS. ''''''''''''''''''''''''''''''''''''
mult 	Concerned O Released O Removed O Sausded Comment (Dational). You may use this field to provide a bird summary of the circumstances leading to the action as well as the current status or final disposition. Your information must fit within the status actions of the status of the status of the disposition. Your information must fit within the status actions of the status of the status of the disposition. Your information must fit within the status actions of the status of the disposition. Your information must fit within the status actions of the status of the status of the disposition. Your information must fit within the status actions of the status of the status of the disposition. Your information must fit within the status actions of the status of the status of the disposition. Your information must fit within the status actions of the status of the status of the disposition. Your information must fit within the status actions of the status of the status of the disposition. Your information must fit within the status actions of the status of the status of the disposition. Your information must fit within the status actions of the status of the status of the disposition. Your information must fit within the status actions of the status of the status of the disposition. Your information must fit within the status actions of the status of the status of the status of the disposition. Your information must fit within the status actions of the status of the status of the status of the disposition. Your information must fit within the status actions of the status of the status of the status of the disposition. Your information must fit within the status actions of the status of the status of the disposition is the status of the
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i multi. 2. 3.	© biocharged [©] Alecased [©] Amoved [©] Sauded Comment (Optional). You may use the field to provide a bird summary of the circumstances leading to the action as well as the current status or final disposition. Your information must fit within the Sarder variable. Ref Was Unawake that This Tukebo INTO A LEN, HAD BEEN WORKING WITH IBS FOR MANY YEARS. CURRENTLY WORKING FOR A RESOLUTION LETTER RANGE ISS. ***1/15/2015 Docket/Case 2 adJustor/2500 with an advertentivity. Het of an disposition of the actionaus end and the adjusture *** Refore to 201500073500 termonous in advertentivity. Het of and is and of the adjusture *** Refore to 201500073500 termonous in advertentivity. Het of and is and of the adjusture *** Refore to 201500073500 termonous in advertentivity. Het of and is and of the adjusture *** Refore to 20150073500 termonous in advertentivity. Het of and is and of the adjusture *** Refore to 20150073500 termonous in advertentivity. Het of and is and of the adjusture *** Refore to 20150073500 termonous in advertentivity. Het of advertentive is a discusse Reporting Page is an [©] NMTIAL of [©] OAMENDED response to report details for affirmative response(i) to Question(s) 1440 on Porm U4: the question(s) you are responding to, regardlass of whether you are answering the question(s) 'yea' or amending the answer(s) to 'no': E is a discusse Reporting Page is an [©] NMTIAL of [©] OAMENDED response to report details for affirmative response(i) to Question(s) 1440 on Porm U4: the question(s) you are responding to, regardlass of whether you are answering the question(s) 'yea' or amending the answer(s) to 'no': E is a discusse Report to the same affirmative answer, details must be provided on separate DRFs. Judgment/Len Anount: S Judgment/Len Anount:
his D	

O Exact O Explanation If not exact, provide explanation: B. How was matter resolved? (select appropriate item): O Discharged O Released O Removed O Satisfied 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 8. provided. This Disclosure Reporting Page is an OINITIAL or OAMENDED 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. Judgment/Lien Amount; 1. \$ 58.354.00 Judgment/Lien Holder 2. STATE OF CALIFORNIA Judament/Lien Type: з. O CIVIL @ Tax 4 A. Date Filed with Court (MM/DD/YYYY): 01/15/2015 @Exact O Explanation If not exact, provide explanation: B. Date individual learned of the Judgment/Lien (MM/DD/YYYY): 09/26/2016 OFvact @Evolanation 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. s. Court action brought in; O Federal Court O State Court O Foreign Court O 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# 5000739500 Check this box if the Docket/Case # is your SSN, a Bank Card number, or a Personal Identification Number 6. Is Judgment/Lien Outstanding? Q Yes Q No. If "No", complete item 7. If "Yes", skip to item 8. If Judgment/Llen is not outstanding, provide: A. Status Date (MM/DD/YYYY): O Exact O Explanation If not exact, provide explanation: B. How was matter resolved? (select appropriate item): O Discharged O Released O Removed O Satisfied 8. Comment (Optional). You may use this field to provide a bnef 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. his Disclosure Reporting Page is an SINITIAL or OAMENDED response to report details for affirmative response(s) to Question(s) 143 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": ¥ 143(1) 143(2) □ 147(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. Firm Name: 1. SII INVESTMENTS, INC. 2. Termination Type: Discharged з. Termination Date: 12/07/2017 @ Exact O Explanation If not exact, provide explanation Alienation(s): 4. TERMINATION BASED UPON FAILURE TO DISCLOSE TAX LIENS AND UPDATE FORM U4, AND USE OF UNAPPROVED EMAIL. Product Type(s): (select all that apply) s No Product Derivative Mutual Fund Annuity-Charitable Direct Investment-DPP & LP Interests OII & Gas Annuity-Fixed Options Equipment Leasing Annuity-Vanable Equity Listed (Common & Preferred Stock) Penny Stock Banking Products (other than CDs)

🗆 co

Commodity Option

Debt-Asset Backed

Debt-Corporate

Equity-OTC Futures Commodity Futures-Financial Index Option ADL000047 Prime Bank Instrument Promissory Note Real Estate Security Security Futures Unit Investment Trust

Debt-Government

Investment Contract
Money Market Fund

Other:

6.	Comment (Optional). You may use this field to provide a bri	ef summary of the circumstances leading to the termination. Your infor	mation must fit within the space provided.
		response to report details for affirmative response(s) to Question(s) vhether you are answering the question(s) "yes" or amending the	
	☐ 7F(1)	□ 7F(2)	□ 7F(3)
		Click here to view question text	
One (event may result in more than one affirmative answer to the al Firm Name:	bove items. Use only one DRP to report details related to the same terr	nination.
	SII INVESTMENTS		
2.	Termination Type: Discharged		
3.	Termination Date:		
	12/07/2017 • Exact • Explanation If not exact, provide explanation:		
4.	Allegation(s):		
5.	REP FAILED TO DISCLOSE TAX LIENS AND UPDATE FORM UP Product Type(s): (select all that apply)	4, AND USED UNAPPROVED EMAIL	
_	No Product	Derivative	Mutual Fund
		Direct Investment-DPP & LP Interests	OII & Gas
1	Annuity-Fixed	Equipment Leasing Equity Listed (Common & Preferred Stock)	
	Banking Products (other than CDs)		Prime Bank Instrument
		Futures Commodity	
		Futures-Financial	
	Debt-Asset Backed Debt-Corporate	Index Option Insurance	Security Futures Unit Investment Trust
		Money Market Fund	Other:
6.	Comment (Optional). You may use this field to provide a bri	ef summary of the orcumstances leading to the termination. Your infor	mation must fit within the space provided.
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Arch	ived Disclosure Events		
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This (Disclosure Reporting Page is an OINITIAL OR OAMENDED	response to report details for affirmative responses to Items 23K(1)	, 23K(2) and 23K(3) on page 3 of Form U-4;
Chec	k item(s) you are responding to:		
023	K(1)	□23K(2)	□23K(3)
If eve	ents result in affirmative answers to both 23K(1) and 23K(2), o	details to each must be provided on separate DRPs.	
1.	Action Type: Bankruptcy		
2.	Action Date (MM/DD/YYYY):		
2.	01/01/1993 O Exact O Explanation If not exact, provide explanation:		
3.	If the financial action relates to an organization over which y	you exercise(d) control, enter Organization Name and your position, bit	e or relationship:
	Was the Organization investment-related? Oyes O No		
4.	Court action brought in (Name of Federal, State or Foreign C Filing): SELF Not Provided PERSONAL BANKRUPTCY	Court), Location of Court (City or County <u>and</u> State or Country), Docket	/Case Number and Bankruptcy Chapter Number (if Federal Bankruptcy
5.	Is action currently pending? Oyes ONo		
6.	If not pending, provide Disposition Type:		
	Discharged		
7.	Disposition Date (MM/DD/YYYY): O\$/01/1993 OExact OExplanation If not exact, provide explanation:		
8.	Provide a brief summary of events leading to the action and NO ALLEGATIONS-SELF INITIATED PERSONAL BANKRUPTCY	if not discharged, explain. (Your information must fit within the space j	provided.):
9.	If a SIPA trustee was appointed or a direct payment procedu	ure was begun, enter the amount paid or agreed to be paid by you; or t ADL000048	he name of the trustee:

	Currently Open? Oyes ONo	
	Date Direct Payment Initiated/Filed or Trustee Appointed (MM/DD/YYYY): OExact OExplanation	
	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 p DISCHARGED Not Provided	rovided.):
	Disclosure Reporting Page Is an OINITIAL OR OAMENDED response to report cetais for affirmative response to <i>Question 141</i> on Form U4; k question(s) you are responding to:	
11	⊠14I(1)(a) □14I(1)(b) □14I(1)(c) □14I(2) □14I(3)(a) □14I	3)(b)
	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 libgation. Use a separate DRP f	
	laint/arbitration/civil litigation.	
	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 a rollitation or CFTC reparation, complete items 13-19, as appropriate. If the matter involves a covil 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).	
Comp	plete items 1-6 for all events.	
1.	Customer Name(s): LEO DOMINGUEZ	
2.	Customer(s) State of Residence: California	
	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 207587.6704% HIS RATE OF RETURN WAS INCREASED KNEW OF THE PENALTIES AND SIGNED ALL APPROPRIATE PAPERWORK	BY 6%. HE
5.	Principal Product Type: Annuity(les) - Variable Other Product Types:	
6.	Alleged Compensatory Damage Amount: \$	
If the	e 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? O Yes O No	
If the	e 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 litigaton, complete items 20-27.	
	Closed/No Action Withdrawn Denied Settled Arbitration/Reparation Litigation	
10.	Status Date (MM/DD/YYYY):	
	O Exact O Explanation If not exact, provide explanation:	
11.	Settlement Amount (if settled without arbitration, litigation or reparation): \$	
12.	Individual Contribution Amount: \$	
If the	e matter involves an arbitration or CFTC reparation, complete Items 13-19, as appropriate.	
13.	Arbitration/Reparation daim filed with FINRA, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:	
14.	Date notice/process was served (MM/DD/YYYY): O Exact O Explanation If not exact, provide explanation:	
:5.	Is arbitration/reparation pending? O Yes O No	
16.		
17.	Disposition Date (MM/DD/YYYY): O Exact O Explanation	
	If not exact, provide explanation:	
18.	Amount of Monetary Compensation (award, settlement, reparation amount): \$	
19.	Individual Contribution Amount: \$	
If th	e 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 (M O Exact O Explanation If not exact, provide explanation:	IM/DD/YYYY):				
22.	Is the civil litigation pending? O γ	Yes O No				
23.	If the civil litigation is not pending,	, what was the disposition?				
24.	Disposition Date (MM/DD/YYYY): O Exact O Explanation If not exact, provide explanation:					
25.	Amount of Monetary Compensation	n (judgment, restitution, settlement amou	unt):			
26.	Individual Contribution Amount:					
27.	If the action is currently on appeal O Exact O Explanation If not exact, provide explanation:	enter date appeal filed (MM/DD/YYYY):				
28.	Comment (Optional). You may use or final disposition(s). Your Informa	this field to provide a bnef summary of t ation must fit within the space provided.	he circumstances leading to the customer	complaint, arbitration/CFTC reparation	and/or civil litigation as well as the cur	rent status
	isclosure Reporting Page (DRP U-5) k item(s) being responded to:	IS an OINITIAL OR OAMENDED resp	poonse to report details for affirmative respo	inse to Items 18(A), 18(B) and 18(C	;) of Form U-5;	
		18A(2) □18A	x(3) D188	Ø18C(1)	D18c(2)	
			only one DRP to report all the details relat			int.
1.	Customer Name(s): DANIEL SIENES LEONARDO DOMIN					
2.	Customer(s) State of Residence: California Other state(s) of residence/detall:					
з.	Employing Firm when activities occu ALAMO CAPITAL					
4.	Date Complaint was received (MM/I 12/29/1999 ©Exact OExplana If not exact, provide explanation:					
5.		of events related to the allegation(s) inclu P.	uding dates when activities leading to the a	allegation(s) occurred:		
6.	Principal Product Type: Annuity(ies) - Variable Other Product Types:					
7.	Alleged Compensatory Damage Am	nount:		\$		
8.	Is complaint pending? O yes O No					
9.	If the complaint is not pending, pro If status is settlement, complete qu if status is arbitration/reparation, co if status is litigation, complete ques	uestions 11 and 12;	i statuses.			
	□No Action □Settled	Withdrawn	⊂Danie D⊾itiga			
10.	Resolution Date(MM/DD/YYYY): OExact OExplanation If not exact, provide explanation:					
11.	Settlement Amount (If settled witho	out Arbitration, Litigation or Reparation):		\$		
12.	Individual Contribution Amount:		\$			
IF AR 13.	BITRATION OR CFTC REPARATIO	ON vith (NASD, AAA, NYSE, CBOE, CFTC, etc.) and Docket/Case Number:			
14.	Date notice/process was served (MI OExact OExplanation If not exact, provide explanation:	M/DD/YYYY):				
15.	Is arbitration/reparation pending?					
16.	If the arbitration/reparation is not p	penoing, what was the disposition?				
17.	Disposition Date (MM/DD/YYYY): O Exact O Explanation If not exact, provide explanation:					
18.	Amount of Monetary Compensation	(award, settlement, reparation amount):	:	\$		
18. 19.	Amount of Monetary Compensation Individual Contribution Amount:		\$	\$		
19.	Individual Contribution Amount: VIL LITIGATION				umber).	

If not exact, provide explanation:				
2. Is the civil litigation pending? OvesONo				
If the civil litigation is not pending, what was the d	isposition?			
4. Disposition Date (MM/DD/YYYY):				
OExact OExplanation If not exact, provide explanation:				
5. Amount of Monetary Compensation (Judgment, res	trution settlement amount):			
 Individual Contribution Amount: 	s		\$	
 If the action is currently on appeal enter date appe 	al filed (MM/DD/YYYY):			
OExact OExplanation If not exact, provide explanation:				
 Provide details as to dispositions, including any lim 	its or conditions, (Your information must fit within	the space provided.)		
his Disclosure Reporting Page is an OINITIAL OR O	MENDED response to report details for affirmativ	ve response to Question 14I on	Form U4;	
heck question(s) you are responding to:				
14I(1)(a)	1)(b) 🗌 141(1)(c)	□ 14I(2)	₩14I(3)(a)	🗆 14I(3)(b)
ne event may result in more than one affirmative answe omplaint/arbitration/civil litigation.	r to the above items. Use only one DRP to report d	details related to one customer co	omplaint/arbitration/civil litigation. Use	a separate DRP for each customer
RP Instructions:				
 In all matters (i.e., customer complaints, arbitratio If the matter involves only a customer complaint, a 	uns/CFTC reparations, civil litigations), complete ite also complete items 7-12, as appropriate.	ems 1-6.		
 If the customer complaint has evolved into an arbit If the matter involves an arbitration or CFTC repart 	ation, complete items 13-19, as appropriate.	he existing DRP by completing iter	ms 9 and 10.	
 If the matter involves a civil litigation, complete ite Item 28 is an optional field and applies to all event 		reparation, civil litigation).		
omplete items 1-6 for all events.				
. Customer Name(s): DANIEL SIENES				
. Customer(s) State of Residence: California				
Other state(s) of residence/detall:				
. Employing Firm when activities occurred which led ALAMO CAPITAL	to the complaint:			
 Allegation(s) and a brief summary of events relate CUSTOMER SENT A LETTER TO ALAMO CAPITAL ST ALAMO. V/A CONTRACT WAS REVERSED PER ALAM 	TATING HE COULD NOT WITHDRAW MANDATORY I			ICES. I FILED A RESPONSE TO
Principal Product Type:				
Annuity(les) - Variable Other Product Types:				
. Alleged Compensatory Damage Amount:				
s the matter involves only a customer complaint, co	omolete items 7-17 as appropriate			
. Date Customer Complaint was received(MM/DD/YY				
01/10/2000 O Exact O Explanation If not exact, provide explanation:				
DATE WHICH I WAS CONTACTED BY ALAMO CAPIT	AL			
Is the customer complaint pending? O Yes O N				
the customer complaint has evolved into an arbiti . If the customer complaint is not pending, provide s		nd the existing DRP by comple	eting items 9 and 10.	
If status is settlement, complete items 11 and 12; If status is arbitration/reparation, complete items				
If status is litigation, complete items 20-27.	Withdrawn		Denie	
			🗆 Litiga	tion
0. Status Date (MM/DD/YYYY): O Exact O Explanation				
If not exact, provide explanation:	Illiphics of respectives).			
 Settlement Amount (If settled without arbitration, I 	iligation or reparation):			
 Individual Contribution Amount: \$ 				
the matter involves an arbitration or CFTC repara	tion, complete items 13-19, as appropriate.			
3. Arbitration/Reparation claim filed with FINRA, AAA,	, NYSE, CBOE, CFTC, etc.) and Docket/Case Numb	er:		
 Date notice/process was served (MM/DD/YYYY): O Exact O Explanation 				
If not exact, provide explanation:				
5. Is arbitration/reparation pending? O Yes O No				
5. If the arbitration is not pending, what was the disp	ADL00	0051		
	ADLOU			

17.	Disposition Date (MM/DD/YYYY): O Exact O 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 Federat, 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): O Exact O Explanation If not exact, provide explanation:
22.	Is the civil litigation pending? O Yes C No
23.	If the civil litigation is not pending, what was the disposition?
24.	Disposition Date (MM/DD/YYYY): O Exact O 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): O Exact O 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 statu:
	or final disposition(s). Your information must fit within the space provided.
This	isclosure Reporting Page is an OINITIAL OR OAMENDED response to report details for affirmative response to Question 141 on Form U4;
	iscosure responding rage is an CANTIAL OR CAMENDED response to report details for animitative response to Question 242 on rolling 04, r question(s) you are responding to:
	□14I(1)(a) □14I(1)(b) □14I(1)(c) □14I(2) ☑14I(3)(a) □14I(3)(b)
000.0	
One e compl	vent 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 custome aint/arbitration/civil litigation.
COMP	vent 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 custome ant/arbitration/civil litigation. Ise a separate DRP for each custome naturations:
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COMP	vent may result in more than one alfirmative 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 custome ant/arbitration/civil litigation. 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 matter complaint has evolved into an arbitration or civil litigation, amend the existing DRP by completing items 9 and 10. If the matter involves a arbitration or CFTC reparation, complete items 1-19, as appropriate.
DRP 1	vent may result in more than one alfirmative 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 custome ant/arbitration/civil litigation. 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 matter complaint has evolved into an arbitration 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 an arbitration or CFTC reparation, complete items 13-19, as appropriate. If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate. If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate. Item 28 is an optional field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation).
DRP 1	<pre>went 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 custome ant/arbitration/civil litigation. 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 or civil litigation, and the existing DRP by completing items 9 and 10. If the matter involves a arbitration or CFTC reparation, complete items 1-19, as appropriate. If the matter involves an arbitration or CFTC reparation, complete items 1-3-19, as appropriate. If the matter involves an arbitration or CFTC reparation, complete items 1-3-19, as appropriate. If the matter involves an arbitration or CFTC reparation, customer complaint, arbitration/CFTC reparation, civil litigation, and 10. If the matter involves an arbitration or CFTC reparation, complete items 1-3-19, as appropriate. If the matter involves an arbitration or CFTC reparation, customer complaint, arbitration/CFTC reparation, civil litigation, civil litigation). If the matter involves an arbitration or CFTC reparation, customer complaint, arbitration/CFTC reparation, civil litigation. If the matter involves an arbitration are complete items 10-27. Item 28 is an optional field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation). If the matter is the customer complaint field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation). If the matter is the customer customer complaint is the matter is the customer customer</pre>
Comp DRP Comp	<pre>vent 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 custome ant/arbitration/civil litigation.</pre> 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 or civil litigation, amend the existing DRP by completing items 9 and 10. If the matter involves a arbitration or CFTC reparation, complete items 1-19, as appropriate. If the matter involves a arbitration or CFTC reparation, complete items 1-3-19, as appropriate. If the matter involves a arbitration or CFTC reparation, complete items 1-3-19, as appropriate. If the matter involves an arbitration or CFTC reparation, complete items 1-3-19, as appropriate. If the matter involves an arbitration or CFTC reparation, complete items 1-3-19, as appropriate. If the matter involves an arbitration or CFTC reparation, complete items 1-3-19, as appropriate. If the matter involves an arbitration or CFTC reparation, complete items 1-3-19, as appropriate. If the matter involves an arbitration or CFTC reparation, customer complaint, arbitration/CFTC reparation, civil litigation, and the existing CFTC reparation, civil litigation). If the matter involves a civil litigation and the exist of an arbitration or CFTC reparation, civil litigation). If the matter involves and arbitration arbitration or CFTC reparation, civil litigation, arbitration/CFTC reparation, civil litigation). If the matter involves a civil litigation and the exist of arbitration/CFTC reparation, civil litigation,
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Comp	vent 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 custome ant/arbitration/civil litigation. 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 or civil litigation, amend the existing DRP by completing items 9 and 10. If the matter involves a arbitration or CFTC reparation, complete items 13-19, as appropriate. If the matter involves a arbitration or CFTC reparation, complete items 13-19, as appropriate. If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate. If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate. If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate. If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate. If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate. If the matter involves an arbitration or CFTC reparation, customer complaint, arbitration/CFTC reparation, civil litigation, and If the matter involves a civil structure and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation). Iete items 1-6 for all events. Customer(s) State of Residence: North Carolina
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Comp 1. 2.	vent may result in more than one diffirmative 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 custome ant/arbitration/civil litigation. nstructions: In all matters (i.e., customer complaints, arbitrations/CFTC reparations, civil litigations), complete items 1-6, if the matter involves and a valuation or CFTC reparation, civil litigation, amend the existing DRP by completing items 9 and 10. If the matter involves a volu litigation or 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, civil litigation). Inter atter involves a volu 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). Inter 20 is an optional field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation). Inter 20 is an optional field and applies to all event types (i.e., customer complaint, arbitration/CFTC reparation, civil litigation). Inter 30 is an optional field and applies to all events. Customer(s) State of Residence: North Carolina Other state(s) of residence/detail: Employing Firm when activities occurred which led to the complaint: SECURTIES 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: CULENT ALLEGES THAT, "TIN BID NOT COMMUNICATE WITH ME ABOUT MY ACCOUNT I WAS NEVER ADVISED OF THE INVESTMENTS MADE ON MY ACCOUNT were DONE WITH OUT MY APPROVAL AND WERE UNAUTHORIZED." THE INVESTMENTS AT ISSUE OCCURRED BETWEEN 2006-2008. Principal Product Type: Alleged Compensatory Damage Amount:
compl DRP 7 Comp 1. 2. 3. 4. 5.	<pre>vent 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/Gwil Illigation. Use a separate DRP for each custome ant/arbitration/cvil litigation. nstructions: In all matters (i.e., customer complaints, arbitrations/CFTC reparations, civil litigations), complete items 1-6. If the matter involves an a arbitration or CFTC reparation, civil litigation, amend the existing DRP by completing items 9 and 10. If the matter involves ar arbitration or CFTC reparation, complete items 1-19, as appropriate. If the matter involves ar arbitration or CFTC reparation, 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). lete items 1-6 for all events. Customer(s) State of Residence: North Carolina Other state(s) of residence/detail: Employing firm when activities securred which led to the complaint: SECURITIES SERVICE NETWORK, INC. Allegation(s) and a brief summary of events related to the allegaton(s) including dates when activities leading to the allegation(s) occurred: CLIENT ALLEGES THAT, "THALEGES THAT," THALEGES THAT, "THALEGES THAT," THALEGES THAT," THALEGES THAT, "THALEGES THAT," THALEGES THAT, "THALEGES THAT," THALEGES THAT," THALEG</pre>
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Compl DRP 1 2. 3. 4. 5. 11 the 7.	<pre>were 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 custome and/arbitration/Civil litigation.</pre>
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12	Individual Contribution Amount:
	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:
14.	Date notice/process was served (MM/DD//YYYY): © Exact © Explanation
	If not exact, provide explanation:
15.	Is arbitration/reparation pending? O Yes O No
16.	If the arbitration is not pending, what was the disposition?
17.	Disposition Date (MM/DD/YYYY): O Exact O Explanation
	f not exact, provide explanation:
18.	Amount of Monetary Compensation (award, settlement, reparation amount): \$
19.	and/vidual Contribution Amount:
	s
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):
	O Exact O Explanation
	If not exact, provide explanation:
22.	Is the dvll litigation pending? O yes O No
23.	If the civil litigation is not pending, what was the disposition?
24.	Disposition Date (MM/DD/YYY);
	O Exact O Explanation If not exact, provide explanation:
25.	Amount of Monetary Compensation (judgment, restitution, settlement amount): \$
26.	Individual Contribution Amount:
	s
27.	If the action is currently on appeal enter date appeal filed (MM/DD/YYYY): O Exact O 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
28.	
28.	Comment (Optional). You may use this held to provide a binef 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
28.	Comment (Optional). You may use this held to provide a binef 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
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Compection Content of the complete of the comp	Company (Columna), You may use the hield agreening and contract so bedieved agreening. Biologies seconds set of a multishing at contract's built within a contract so built within a c
Compection Content of the complete of the comp	Contract (Closed), You may use this held to provide a bief atommany of the commandous leading to the customer complaint, arbitration/CFTC reparation and/or onel linguion as well as the current subate of the distance of the contract is unable of the con
Comp Comp 1. 2. 3. 4. 5. 5. 8.	Contract (Contract), You may use this held to greated a hind atomany of the orientations leading to the customer contplaint, atotration/CFTC reparation and/or onell lingation as well as the current stable miting disposition of the tract (Ling View) may distribute at CONTRACTS DUBRING WIICIT CLEARES THE INVESTMENTS WEEE DISCUSSED, NO CONPENSATORY DAWAGE CLAIM IS MADE BUT A GOOD FATT BERNET MARKER SCOULD EXCEED SQUOD DICTATES THE INVESTMENTS WEEE DISCUSSED, NO CONPENSATORY DAWAGE CLAIM IS MADE BUT A GOOD FATT BUT A GOOD FA

	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			
	Status Date (MM/DD/YYYY):	Arbitration/Reparation			
	10/03/2008 © Exact O Explanation If not exact, provide explanation:				
	Settlement Amount (if settled without arbitration, iltigation or reparations)	on):			
	Individual Contribution Amount: \$				
If the	matter Involves an arbitration or CFTC reparation, complete iter	ns 13-19, as appropriate.			
13.	Arbitration/Reparation claim filed with FINRA, AAA, NYSE, CBOE, CFTC	, etc.) and Docket/Case Number:			
	Date notice/process was served (MM/DD/YYYY): O Exact O Explanation If not exact, provide explanation:				
15.	Is arbitration/reparation pending? O Yes O No				
16.	If the arbitration is not pending, what was the disposition?				
	Oisposition Date (MM/DD/YYYY): O Exact O Explanation If not exact, provide explanation:				
18.	Amount of Mcnetary Compensation (award, settlement, reparation am	ount):			
19.	\$ Individual Contribution Amount: \$				
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 - Cit	y or County and State or Country, Do	cket/Case number).	
21.	Date notice/process was served (MM/DD/YYYY): O Exact O Explanation If not exact, provide explanation:				
22.	Is the civil litigation pending? O Yes O No				
	If the civil litigation is not pending, what was the disposition?				
	Disposition Date (MM/DD/YYYY):				
	O Exact O Explanation If not exact, provide explanation:				
25.	Amount of Monetary Compensation (judgment, restitution, settlement	amount):			
	Individual Contribution Amount:	anouny.			
27	\$	201.			
27.	If the action is currently on appeal enter date appeal filed (MM/DD/YY) O Exact O Explanation If not exact, provide explanation:				
28.	Comment (Optional). You may use this field to provide a brief summar or final disposition(s). Your information must fit within the space provin BROKER'S RECORDS REFLECT NUMEROUS MEETING AT CONTACTS DU DETERMINATION MADE BY THE FIRM THAT DAMAGES COULD EXCEED	ded. IRING WHICH CLIENTS INVESTMENTS	WERE DISCUSSED. NO COMPENSATO		
				the second second second	
This D	isclosure Reporting Page is an OINITIAL OR OAMENDED response	e to report details for affirmative reso	onse to Question 141 on Form U4:		
	question(s) you are responding to:				
	14I(1)(a) 14I(1)(b)	14I(1)(c)			141(3)(b)
	vent may result in more than one affirmative answer to the above item: aint/arbitration/civil litigation.	a. Use only one UKP to report details r	cloce to one customer complain@arb	in doorg day nugation. Use a separate L	and for each customer
	nstructions:				
•	In all matters (i.e., customer complaints, arbitrations/CFTC reparation. If the matter involves only a customer complaint, also complete items If the customer complaint has evolved into an arbitration/CFTC repara	7-12, as appropriate.			
	If the matter involves an arbitration or CFTC reparation, complete item If the matter involves an arbitration or CFTC reparation, complete item 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., custom	ns 13-19, as appropriate.			
Comp	lete items 1-6 for all events.				
1.	Customer Name(s): RICHARD GONZALES				
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 CLIENT ALLEGES THAT "CMO BOND INVESTED ON 07/09/2008 FOR \$	i) including dates when activities lead 100K WAS NOT APPROVED FOR PURCH	ng to the allegation(s) occurred: IASE PRIOR TO MY KNOWLEDGE		
5.	Principal Product Type: Debt - Asset Backed	ADL000054			1

	Other Product Types:				1
6.	Alleged Compensatory Damage Arncunt: \$ 5,000.00				
If the	matter involves only a customer complaint, complete items 7-12	2, as appropriate.			
7.	Oate Customer Complaint was received(MM/DD/YYYY): 09/19/2008 ☉ Exact ○ Explanation If not exact, provide explanation:				
8.	Is the customer complaint pending? O yes O No				
If the	customer complaint has evolved into an arbitration/CFTC repara	ation or civil litigation, amend	the existing DRP by completin	ng 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/repretation, complete items 13-19; If status is litigation, complete items 20-27. Closed/No Action Settled	U Withdrawn		Denied	
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	on):			
12.	Individual Contribution Amount: \$				
If the	matter involves an arbitration or CFTC reparation, complete iter	ns 13-19, as appropriate.			
13.	Arbitration/Reparation Claim filed with FINRA, AAA, NYSE, C8OE, CFTC	, etc.) and Docket/Case Number:			
14.	Date notice/process was served (MM/CD/YYYY): O Exact O Explanation If not exact, provide explanation:				
15.	Is arbitration/reparation pending? O Yes O No				
16.	If the arbitration is not pending, what was the disposition?				
17.	Disposition Date (MM/DD/YYYY): O Exect O Explanation If not exact, provide explanation:				
18.	Amount of Monetary Compensation (award, settlement, reparation am \$	ount):			
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 Co	untry, Docket/Case number).	
21.	Date notice/process was served (MM/DD/YYYY): O Exact O Explanation If not exact, provide explanation:				
22.	Is the civil litigation pending? O Yes O No				
23.	If the civil litigation is not pending, what was the disposition?				
24.	Disposition Cate (MM/DD/YYYY): O Exact O 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/YY) O Exact O Explanation If not exact, provide explanation:	YY):			
28.	Comment (Optional). You may use this field to provide a brief summar or final disposition(5). Your information must fit within the space provi BROKER'S RECORDS REFLECT MEETINGS WITH CLIENT JUSF PRIOR T DAMAGES COULD EXCEED \$5000 DICTATES THE REPORTING OF THIS	ded. O BOND PURCHASE. NO COMPEN			
	bisclosure Reporting Page is an @INITIAL OR OAMENDED respons k question(s) you are responding to:	e to report details for affirmative	response to Questions 7(E)(1),	7(E)(2) and 7(E)(3) on Form US ;	
	□7(E)(1)(a) □7(E)(1)(b)	□ 7(E)(1)(c)	Π7(Ε)(2)	Ø 7(E)(3)(a)	□7(E)(3)(b)
	vent may result in more than one affirmative answer to the above item aint/arbitration/civil litigation.				
	Instructions:				
	In all matters (i.e., customer complaints, arbitrations/CFTC reparation If the matter involves only a customer complaint, also complete items If the customer complaint has evolved into an arbitration/CFTC reparator If the matter involves an arbitration or CFTC reparator, complete item If the matter involves as civil litigation, complete items 20-27. Item 28 is an optional field and applies to all event types (i.e., custom	7-12, as appropriate. tion or civil litigation, amend the ns 13-19, as appropriate.	existing DRP by completing items	9 and 10.	
	olete items 1-6 for all events.				
1.	Customer Name(s): RICHARD GONZALES	ADL000	055		

-		
28.	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 or final disposition(5). 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 DETERMINA DAMAGES COULD EXCEED \$5000 DICTATES THE REPORTIN OF THIS COMPLAINT	
	O Exact O Explanation If not exact, provide explanation:	as well as the
26. 27.	26. Individual Contribution Amount: \$ 27. If the action is currently on appeal enter date appeal filed (MM/DD/YYYY):	
25.	\$	
	O Exact O Explanation If not exact, provide explanation:	
1.00	23. If the Civil litigation is not pending, what was the disposition? 24. Disposition Date (MM/DD/YYYY):	
	Is the civil lifegation pending? O'Yes O'No 23. If the civil lifegation is not pending, what was the disposition?	
22.	O Exact O Explanation If not exact, provide explanation:	
20. 21.	 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): 	
If th	f the matter involves a civil litigation, complete items 20-27.	
19.		
18.		
17.	17. Disposition Date (MM/DD/YYYY): O Exact O Explanation If not exact, provide explanation:	
16.	16. If the arbitration is not pending, what was the disposition?	
15.	15. Is arbitration/reparation pending? O yes O No	
	O Exact O Explanation If not exact, provide explanation:	
13. 14.		
	If the matter involves an arbitration or CFTC reparation, complete items 13-19, as appropriate.	
12.	12. Individual Contribution Amount: \$	
11.	 SetUement Amount (if settled without arbitration, litigation or reparation): \$ 	
10.	10. Status Date (MM/DD/YYYY): 10/03/2008 ☉ Exact ☉ Explanation If not exact, provide explanation:	
	If status is settlement, complete items 11 and 12; If status is arbitration/reparation, complete items 13-19; If status is libitration/reparation, complete items 13-19; If status is libitration and the status is libitratis and the status is l	
If the	If the customer complaint has evolved into an arbitration/CFTC reparation or civil litigation, amend the existing DRP by completing items 9 and 10.	
8.	Is the customer complaint pending? Or Yes I No	
7.	7. Date Customer Complaint was received(MM/DD/YYYY): 09/19/2008 ☉ Exact ☉ Explanation If not exact, provide explanation:	
If th	If the matter involves only a customer complaint, complete items 7-12, as appropriate.	
6.	 Alleged Compensatory Damage Amount: \$ 5,000.00 	
5.	5. Principal Product Type: Debt - Asset Backed Other Product Types:	
4.	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"	
3.	3. Employing Firm when activities occurred which led to the complaint: SECURITIES SERVICE NETWORK, INC.	
,		

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 custo 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 litigator, complete items 20-27.
 Item 28 is an optional field and applies to all event types (i.e., customer complaint, arbitration/GFTC reparation, civil litigation). Complete items 1-6 for all events. Customer Name(s): GREG AUSLEN 1 Customer(s) State of Residence: California Other state(s) of residence/detail: 2. Employing Firm when activities occurred which led to the complaint: SII INVESTMENTS, INC. 3. 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 TIMILY. 4. Principal Product Type: Mutual Fund(s) Other Product Types: 5. 6. Alleged Compensatory Damage Amount: \$ 15,950.00 If the matter involves only a customer complaint, complete items 7-12, as appropriate. Date Customer Complaint was received(MM/DD/YYYY): 7. 12/19/2008 @ Exact O Explanation If not exact, provide explanation: 8. Is the customer complaint pending? O yes O 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, somplete items 11 and 12; If status is arbitration/reparation, complete items 13-19; If status is lilligation, complete items 20-27. 9. Cosed/No Action Withdrawn Denied Arbitration/Reparation Litigation 10. Status Date (MM/DD/VVVV): 01/14/2009 © Exact O 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: Date notice/process was served (MM/DD/YYYY): 14. O Exact O Explanation If not exact, provide explanation: 15. Is arbitration/reparation pending? O Yes O No 16. If the arbitration is not pending, what was the disposition? 17. Disposition Date (MM/DD/YYYY): O Exact O 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 Country and State or Country, Docket/Case number). 21. Date notice/process was served (MM/DD/YYYY): O Exact O Explanation If not exact, provide explanation: 22. Is the civil litigation pending? O yes O No 23. If the civil litigation is not pending, what was the disposition? 24. Disposition Date (MM/DD/YYYY): O Exact O 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): O Exact O Explanation If not exact, provide explanation: 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. 28. ADI 000057

2.9	
This D	isclosure Reporting Page is an OINITIAL OR OAMENDED 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)(c) □ 141(2) ☑ 141(3)(a) □ 141(3)(b)
	vent may result in more than one alfirmative 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
	aint/arbitration/civil litigation.
	nstructions: In all matters (i.e., customer complaints, arbitrations/CFTC reparations, civil itigations), 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 of coll litugation, 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 illigation, 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).
Comp	lete items 1-6 for all events.
1.	Customer Name(s): GREGG AUSLEN
2.	Customer(s) State of Residence: California
	California Other state(s) of residence/detail:
з.	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
	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 O Explanation
	If not exact, provide explanation:
8.	Is the customer complaint pending? O Yes O No
	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 somplaint is not pending, provide status: If status is settlement, complete items 11 and 12; If status is arbitration/reparation, complete items 13-19;
	I status is lifegation, complete items 20-27. □ Unit for annow ☑ Denied □ Closed/No Action □ Arbitration/Reparation □ Litigation
10.	Status Date (MM/DD/YYYY):
	03/05/2009 © Exact O Explanation If not exact, provide explanation:
11.	Settlement Amount (if settled without arbitration, kilgation or reparation): \$
12.	Individual Contribution Amount: \$
	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: Date notice/process was served (MM/DD/YYYY):
	O Exact O Explanation If not exact, provide explanation.
15.	Is arbitration/reparation pending? O Yes O No
16.	If the arbitration is not pending, what was the disposition?
17.	Disposition Date (MM/DD/YYYY): O Exact O Explanation If not exact, provide explanation:
18.	Amount of Monetary Compensation (award, settlement, reparation amount): \$
19.	Individual Contribution Amount: \$
	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): O Exact O Explanation If not exact, provide explanation:
22.	Is the civil litigation pending? O Yes O No
23.	If the civil litigation is not pending, what was the disposition?
24.	
	O Exact O Explanation If not exact, provide explanation:
1	ADL000058

	ion (judgment, restitution, settlement a	amount):		
 Individual Contribution Amount: 				
 If the action is currently on appining O Exact O Explanation If not exact, provide explanation 	eal enter date appeal filed (MM/DD/YYY	y):		
28. Comment (Optional). You may u		y of the circumstances leading to the customer comp	plaint, arbitration/CFTC reparation and/or civil	litigation as well as the current status
	mator mast ne want the space provid			
		to report details for affirmative response(s) to Quest bu are answering the question(s) "yes" or anne		
□ 7E(1)(a) □ 7E(1)(b)	□ 7E(2)(a) □ 7E(2)(b)	☑ 7E(3)(a) □ 7E(3)(b)	□ 7E(4)(a) □ 7E(4)(b)	□ 7E(5)(a) □ 7E(5)(b)
□ 7E(1)(c) □ 7E(1)(d)				
		Click here to view question text		
One matter may result in more than or itigation). Use a separate DRP for each		s. Use a single DRP to report details relating to a pa	irticular matter (i.e., a customer complaint/art	nitration/CFTC reparation/civil
DRP Instructions:				
	ers (i.e., customer complaints. arbitrati	ons/CFTC reparations and civil litigation in which a c	customer alleges that the individual was involu-	red in sales practice violations and the
individual is not named as a par	ty, as well as arbitrations/CFTC reparal	tions and civil litigation in which the individual is nar paration or civil litigation in which a customer allege	med as a party).	
is not named as a party, comple	ete items 7-11 as appropriate.			
 If the matter involves an arbitra 	ation/CFTC reparation in which the indiv	n or Gvil litigation, amend the existing DRP by comp ridual is a named party, complete items 12-16, as a		
	pation in which the individual is a name applies to all event types (i.e., custome	d party, complete items 17-23. er complaint, arbitration/CFTC reparation, civil litigal	tion).	
Complete items 1-6 for all matters (i.e.	, customer complaints, arbitrations/CF	TC reparations, civil litigation).		
1. Customer Name(s): GREGORY COLLOZZO				
	nce (select "not on list" when the custor	mer's residence is a foreign address):		
New York B. Other state(s) of residence/d				
 Employing Firm when activities SECURITIES SERVICE NETWOR 		nplaint, arbitration, CFTC reparation or civil litigation	n:	
) including dates when activities leading to the alleg /E MY PRINCIPAL DUE TO THE DECREASING VALUE		
5. Product Type(s): (select all that				
No Product		Derivative	Mutual Fund	
Annuity-Chantable		Direct Investment-DPP & LP Interests	Oil & Gas	
		Equipment Leasing Equity Listed (Common & Preferred Stock)	Options Penny Stock	
Banking Products (ct)	ner than CDs)			
Пср		Futures Commodity	Promissory Note	
Commodity Option		Futures-Financial	Real Estate Security	
Debt-Asset Backed Debt-Corporate		Index Option Insurance	Security Futures Unit Investment Trust	
Debt-Government				
Debt-Municipal		Money Market Fund	Other:	
 Alleged Compensatory Damage 6.7 000 00 	Amount:			
\$ 67,000.00 • Exact O Evolution (if or		aint must be reported unless the firm has made a g	and faith determination that the damage for	n the alleged conduct would be loss
than \$5,000):	o comage amount is alleged, the compl	onic musc be reported unless the firm has made a gi	ood ratti determination that the damages from	n the anegeo conduct would be less
f the matter involves a customer comp party, complete items 7-11 as appropri		vil litigation in which a customer alleges that the ind	lividual was involved in sales practice violation	s and the individual Is <u>not</u> named as a
		reparations or civil titigation in which the individual	is named as a party.	
7. A. Is this an oral complaint?				
O Yes @ No				
B. Is this a written complaint?				
Yes O No C. Is this an arbitration/CFTC r	enaration or civil litigation?			
O Yes @ No				
If ves, provide:				
	n or court name and location:			
II, Docket/Case#:				
	FTC reparation or civil litigation (MM/DI	D/YYYY):		
D. Date received by/served on				
06/04/2009 O Exact O Expl If not exact, provide explanation				
	TC reparation or civil litigation pending	7		
O Yes O No If "No", complete Item 9.				
		ADL000059		

	If the complete adversion (CETC consuming or civil idention is not pendion, provide status:
9.	If the compleint, arbitration/CFTC reparation or civil litigation is not pending, provide status:
	Arbitration Award/Monetary Judgment (for claimants/plaintiffs)
	Arbitration Award/Honetary Judgment (for respondents/defendants)
	Evolved into Arbitration/CFTC reparation (you are a named party)
f chatu	Evolved into Civil litigation (you are a named party) s is arbitration/CFTC reparation in which the individual is <u>not</u> a named party, provide details in item 7C.
f statu	s is arbitration/CFTC reparation in which the individual is a named party, complete items 12-16.
	s is civil litigation in which the individual is a named party, complete items 17-23. Status Date (MM/DD/YYYY):
10.	10/31/2009 © Exact O Explanation
	If not exact, provide explanation:
	Settlement/Award/Monetary Judgment: A. Settlement/Award/Monetary Judgment amount:
	\$
	B. Individual Contribution Amount: \$
lf the r	natter 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 (MH/DD/YYY):
	O Exact O Explanation If not exact, provide explanation:
13.	Is arbitration/ CFTC reparation pending?
	O yes O No
If "No"	. complete item 14.
	complete item 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
15.	Disposition Date (MM/DD/YYYY): O Explanation
	C Exec C Expension
	Nonctary Compensation Details (award, settlement, reparation amount): A. Total Amount:
	\$
	B. Individual Contribution Amount: \$
	natter involves a civil litigation in which the individual is a defendant, complete items 17-23.
17.	Court in which case was filed:
	O Federal Court O State Court O Foreign Court O Military Court O Other :
	A. Name of Court:
	B. Location of Court (City or County and State or Country):
	C. Docket/Case#:
18.	Date notice/proctss was served (MM/DD/1111):
	O Exact. O Explanation If not exact, provide explanation:
19.	Is the civil kigabion pending?
	O Yes O No
lf "No"	, complete item 20.
	If the civil litigation is not pending, what was the disposition?
	Denied Dismissed Judgment (other than monetary)
	Importanty Judgment to Applicant (Agent/Representative) Importanty Judgment to Customer Invo Action Importanty Settled Importanty Judgment to Customer Importanty Judgment to Customer
21.	Disposition Date (MM/DD/YYYY):
	O Exact O Explanation
	If not exact, provide explanation:
22.	Monetary Compensation Details (judgment, restitution, settlement amount):
	A, Total Amount:
	\$ B. Individual Contribution Amount:
	\$
	If action is currently on appeal: A. Enter date appeal filed (MM/DD/YYYY):
	O Exact O Explanation
	If not exact, provide explanation:
	B. Court appeal filed in:
	O Federal Court O State Court O Foreign Court O Military Court O Other :
	I. Name of Court:
	ii. Location of Court (City or County and State or Country):
	HI, Docket/Case#:
	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.

	الباري الركاني فيروا الأصور عز					
	□ 14I(1)(a) □ 14I(1)(b) □ 14I(1)(c)	□ 14I(2)(a) □ 14I(2)(b)	Ø 14I(3 □ 14I(3		□ 14I(4)(a) □ 14I(4)(b)	□ 14I(5)(a) □ 14I(5)(b)
	\Box 14I(1)(d)		Click here to view	question text		
mat	ter may result in more than one affirmati	ve answer to the above item	s. Use a single DRP to report d	letails relating to a particula	ar matter (I.e., a customer complaint/ar	bitration/CFTC reparation/ovil
). Use a separate DRP for each matter.					
P Ins	tructions:					
• 11 • 11 • 11 • 11	omplete items 1-6 for all matters (i.e., c amed as a party, as well as arbitrations/ i the matter involves a customer complai arty, complete items 7-11 as appropriate a customer complaint has evolved into a the matter involves an arbitration/CFTC the matter involves a civil fitigation in w em 24 is an optional field and applies to	CFTC reparations and civil lit nt, or an arbitration/CFTC re an arbitration/CFTC reparation reparation in which you are hilch you are a named party,	igation in which you <u>are</u> named paration or civil litigation in wh on or civil litigation, amend the a named party, complete item , complete items 17-23.	I as a party). Ich a customer alleges that existing DRP by completing s 12-16, as appropriate.	you were involved in sales practice viol	
C	e items 1-6 for all matters (i.e., custome ustomer Name(s): REGORY COLLOZZO	r complaints, arbitrations/CF	TC reparations, civil litigation).			
	. Customer(s) State of Residence (select	"not on list" when the custo	mer's residence is a foreign ad	dress):		
N	ew York . Other state(s) of residence/detail:					
		which lad to the surface	molaiot achitestice. CETC	ration or civil luteration		
	mploying Firm when activities occurred v ECURITIES SERVICE NETWORK, INC.	which led to the customer co	inplaint, arbitration, CFTC repai	ration of civil litigation:		
	llegation(s) and a brief summary of even LIENT ALLEGES THAT MR. SULLIVAN NE					
P	roduct Type(s): (select all that apply)					
	No Product		Derivative		Mutual Fund	
	Annuity-Charitable		Direct Investment-DPP &	LP Interests	OII & Gas	
	Annuity-Fixed		Equipment Leasing Equity Listed (Common &	Preferred Stock)	Options Penny Stock	
	Banking Products (other than Cl	Ds)	Equity-OTC		Prime Bank Instrument	
	Пср		Futures Commodity		Promissory Ncte	
	Commodity Option		Futures-Financial		Real Estate Security	
	Debt-Asset Backed		Index Option		Secunty Futures	
	Debt-Corporate		Insurance		Unit Investment Trust	
	Dept-Municipal		Money Market Fund		Other:	
	lleged Compensatory Damage Amount:					
	67,000.DO Exact O Explanation (1f no damage	amount is alloand the same	lates must be reported values t	he firm has made a cood fi	with determination that the damages from	m the alleged conduct would be le
t	nan \$5,000):					
	atter involves a customer complaint, arbi 11 as appropriate.	tration/CFTC reparation or c	ivil litigation in which a custome	er alleges that you were inv	volved in sales practice violations and yo	u are <u>not</u> named as a party, comp
e: Re	port in Items 12-16, or 17-23, as approp	priate, only arbitrations/CFT	reparations or civil litigation in	n which you <u>are</u> named as a	a party.	
	A. is this an oral complaint?					
	O Yes O No					
	B. Is this a written complaint?					
	O Yes O NO					
	C. Is this an arbitration/CFTC reparation	or civil litigation?				
	O Yes @ No					
	If yes, provide: I. Arbitration/reparation forum or court	name and location:				
	il. Docket/Case#:					
	in. Filing date of arbitration/CFTC repara	ation or civil litigation (MM/D	D/YYYY):			
C	D. Date received by/served on firm (MM/I	DD/YYYY):				
	6/04/2009 O Exact O Explanation					
	s the complaint, arbitration/CFTC reparat O yes	ion or civil litigation pending	7			
	"No", complete item 9.					
	the complaint, arbitration/CFTC reparat	ion or civil litigation is not pe	ending, provide status:			
	Closed/No Action		Denied	Settled		
	Arbitration Award/Monetary Judgment		s)			
	Evolved Into Arbitration/CFTC reparati					
	Evolved into Civil litigation (you are a					
	is arbitration/CFTC reparation in which y is arbitration/CFTC reparation in which y					
	is evil litigation in which you are a name (tatus Date (MM/DD/YYYY):	d party, complete items 17-	23.			
	0/31/2009 Exact O Explanation					
	not exact, provide explanation:					
1						

6	5
	Xour Contribution Amount: S
If the r	atter 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):
	O Exact O Explanation
	If not exact, provide explanation:
13.	Is arbitration/ CFTC reparation pending? O Yes O 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):
	O Exact O 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.
	Court In which case was filed:
	O Federal Court O State Court O Foreign Court O Military Court O 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);
	O Exact O Explanation If not exact, provide explanation:
	a not exact, provide explanation.
19.	Is the ovil litigation pending? O yes O No
	", complete item 20.
20.	If the civil litigation is not pending, what was the disposition?
	Monetary Judgment to Applicant (Agent/Representative)
	□ No Action □ Settled □ Withdrawn □ Other :
21.	Disposition Date (MM/DD/YYYY):
	O Exact O Explanation If not exact, provide explanation:
22.	Monetary Compensation Details (judgment, restitution, settlement amount):
	A. Total Amount: S Vour Contribution Amount:
	8
23.	If action is currently on appeal: A. Enter date appeal filed (MM/DD/YYYY):
	O Exact O Explanation If not exact, provide explanation:
	8. Court appeal filed in: O Federal Court O State Court O Foreign Court O Military Court O Other : I. Name of Court:
	ii. Location of Court (City or County and State or Country):
	lii. Docket/Case#:
24	
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.
	visclosure Reporting Page is an OINITIAL or OAMENDED response to report details for affirmative response(s) to Question(s) 14M on Form U4; t the question(s) you are responding to, regardless of whether you are answering the question(s) "yes" or amending the answer(s) to "no":
Check	יר איז קאפאנטאנט אסא איז גיבאטאוטוווע ש, ובעשיטיפא טי אוופגווט איז פון פווסאפוואט אופ קעבאנטאנט אסא טי פוווסוטווע גוופ מוזאאנינאן גט איז
-	I 14M
If mul	Glick here to view auestion text Itiple, 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

S	TATE OF CALIFORNIA FRANCHISE TAX	K BOARD			
3. Ju	udgment/Lfen Type:				
C	Civil © Tax				
4. D	ate Filed (NM/DD/YYYY):				
	5/10/2011 @Exact O Explanation				
	not exact, provide explanation:				
	ourt action brought in:				
		Foreign Court Other: STATE OF CA	LIFORNIA FRANCHISE TAX BOARD		
	 Name of Court (Federal, State, Fcrei TATE OF CALIFORNIA 	ign or Other):			
	. Location of Court (City or County and	d State or Country):			
	ACRAMENTO, CA	g state of country).			
	Docket/Case#:				
_	**-**-***				
<u>_</u>	Check this box if the Docket/Case# i	is your SSN, a Bank Card number, or a	Personal Identification Number.		
6. Is	Judgment/Lien Outstanding?				
0	Yes ONO				
,	f "No", complete Item 7. If "Yes", skip	n to item 8			
	Judgment/Lien is not outstanding, pr	rovide:			
A	. Status Date (MM/DD/YYYY):				
0	6/09/2011 © Exact O Explanation				
1f	not exact, provide explanation:				
в	. How was matter resolved? (select a:	opropriate item):			
	Discharged O Released O Remove				
		sheld to provide a brief summary of the	circumstances leading to the action as well a	s the current status or final disposition. You	ur information must fit within the space
	rovided.	WAL OF ORDER TO WITHHOLD TAX ON	06/08/2011		
P.	IN ACCEIVED NOTICE TO WITHDRAY	THE OF ORDER TO WITHHOLD TAX ON	50/ 0 / EUI 1.		
5212					
					Contractor of the second
	Sure Reporting Page is an OINITI	AL OF DAMENDED RESPONSE to report	t details for affirmative response(s) to Questi	00 141 00 Form 114	
			answering the question(s) "yes" or amer		
					the second second second second
_			8	B. and and A	
	\Box 14I(1)(a)	14I(2)(a)	2 14I(3)(a)	$\Box_{14I(4)(a)}$	
	\Box 14I(1)(b) \Box 14I(1)(c)	□ 14I(2)(b)	14I(3)(b)	14I(4)(b)	14I(5)(b)
	14I(1)(c)				
			Click here to view question text		
			single DRP to report details relating to a par	ticular matter (i.e., a customer complaint/a	arbitration/CFTC reparation/ovil
litigation). Use a separate ORP for each matter		single DRP to report details relating to a par	ticular matter (i.e., a customer complaint/a	arbitration/CFTC reparation/ovil
litigation			single DRP to report details relating to a par	ticular matter (i.e., a customer complaint/a	arbitration/CFTC reparation/ovil
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ORP Ins ORP Ins C n II P). Use a separate ORP for each matter tructions: omplete items 1-6 for all matters (i.e. amed as a party, as well as arbitrabo the matter involves a customer comp arty, complete items 7-11 as approprint the complete items 7-11 as approprint	r. ., customer complaints, arbitrations/CFT ns/CFTC reparations and civil litigation i plaint, or an arbitration/CFTC reparation tate.	C reparations and civil litigation in which a cu which you <u>are</u> named as a party). or civil litigation in which a customer alleges	ustomer alleges that you were <i>involved</i> in s that you were <i>involved</i> in sales practice vi	ales practice violations and you are <u>no</u>
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1	B. Is this a written complaint?
	© Yes O № C. Is this an arbitration/CFTC reparation or civil litigation?
	O Yes O No
	If yes, provide: I. Arbitration/reparation forum or court name and location:
	ii. Docket/Case#:
	III. Filling 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 O Explanation
1	If not exact, provide explanation:
8.	Is the complaint, arbitration/CFTC reparation or civil litigation pending?
	O Yes O No If "No", complete item 9.
9.	If the complaint, arbitration/CFTC reparation or civil litigation is not pending, provide status:
	Closed/No Action Ultitudrawn Settled
	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)
lf stat	us is arbitration/CFTC reparation in which you are <u>not</u> a named party, provide details in item 7C. us is arbitration/CFTC reparation in which you are a named party, complete items 12-16.
ir stat 10.	us is civil litigation in which you are a named party, complete items 17-23. Status Date (MM/DD/YYYY):
	04/13/2015 © Exact O Explanation If not exact, provide explanation:
11.	Settlement/Award/Monetary Judgment: A. Settlement/Award/Monetary Judgment emount:
	\$ B. Your Contribution Amount: \$
	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):
	O Exact O Explanation If not exact, provide explanation:
13.	Is arbitration/ CFTC reparation pending? O Yes O 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):
	O Exact O Explanation If not exact, provide explanation:
16.	Monetary Compensation Details (award, settlement, reparation amount):
	A. Total Amount: \$
	B. Your Contribution Amount: \$
If the 17.	matter involves a civil litigation in which you are a defendant, complete items 17-23. Court in which case was filed:
	O Federal Court O State Court O Foreign Court O Military Court O Other :
1	A. Name of Court: B. Location of Court (City or County <u>and</u> State or Country):
	C. Docket/Case#:
18.	Date notice/process was served (MM/DD/YYYY): O Exact O Explanation
l	If not exact, provide explanation:
19.	Is the civil litigation pending?
l	O Yes O No
If "No 20.	', complete item 20, If the civil litigation is not pending, what was the disposition?
111	Denied Dismissed Dismissed
1	Monetary Judgment to Applicant (Agent/Representative) No Action Settled Withdrawn
	Other:
21.	Disposition Date (MM/DD/YYYY): O Exact O Explanation
	If not exact, provide explanation:
22.	Monetary Compensation Details (judgment, restitution, settlement amount):
1	A. Total Amount: ADL000064

	S B. Your Contribution Amount:
	\$
23.	If action is currently on appeal:
	A. Enter date appeal filed (MM/DD/YYYY):
	O Exact O Explanation If not exact, provide explanation:
	B. Court appeal filed in:
	O Federal Court O State Court O Foreign Court O Military Court O Other : I. Name of Court:
	H. 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 SEEX TAX ADVICE FROM A PROFESSIONAL BEPORE SHE SURRENDERED THE INHERITED PRODUCT. SHE WAS GIVEN A REFERRAL TO A CPA SINCE SHI 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

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Markets
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Dotcom Bubble

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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.

Topics

Reference
Advisors

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.

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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

<u>REPRESENTATION OF PARTIES</u>

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.

ADL000069

NASD Dispute Resolution Arbitration No. 02-04811 Award Page 2 of 5

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:

- 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.
- 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.
- 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.

NASD Dispute Resolution Arbitration No. 02-04811 Award Page 3 of 5

FEES

Pursuant to the Code, the following fees are assessed:

<u>Filing Fees</u>

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
Hearing Process Fee	= \$ 2,750.00
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	
C	July 16, 2003	2 sessions	
	541 10, 2000	2 50010115	

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 fess to Respondents FSC Securities Corporation, Frank A. Cuenca and Timothy C. Sullivan jointly and severally.

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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	
	Forum Fees	= \$ 2,812.50	
	Total fees	=\$ 3,112.50	
	Less payments	= \$ (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	
	Less payments	= <u>\$ (5,200.00)</u>	
	Balance Due NASD Dispute Resolution	= \$ 0.00	
3.	Respondents FSC Securities Corporation, Frank A. Cuenca and Timot charged jointly and severally with the following fees and costs:	hy C. Sullivan are	
	Forum Fees	=\$ 2,812.50	
		= \$ 0.00	
	Less payments		
	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.

NASD Displet Resolution Arbitration No. 02-04811 Award Page 5 of 5

ARRITRATION PANEL

James L. Robart, Esg. Joseph C. Roberts, Esg. Jorome O. Cohen, Esq.

Non-Public Arbitrator, Presiding Chair Public Arbitrator Public Articrator

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Concerning Arbitrators' Signatures

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JAMES L ROBART, ESQ. Chair, Non-Public Arbinator

JOSEPH C. ROBERTS, ESQ. Public Artigrator

JEROME O. COHEN, ESQ. Public Arlitettor

Signature Date

Signature Date

Signature Date

Date of Service

ADL000073

NASD Dispuse Resolution Arbitration No. \$2-04811 Award Page 5 of 5

ABBITRATION PANEL

James L. Kabart, Esq.	
Joseph C. Roberts, Etg.	
Jerome O. Cohen, Esq.	

Non-Public Arbitrator, Presiding Chair Public Arthronor

Public Arburator

Concerning Arbitrators' Signatures

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

JOSEPH C. ROBERTS, ESQ. Public Arbitrator

JEROME O. COHEN, ESQ. Public Aristrator

Signature Date

Signature Date

81.103

Signature Date

Service



INVESTMENT SERVICES

FINRA - via <u>drportal.finra.org</u> 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 Sienes 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 Sienes 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

FINANCIAL INDUSTRY REGULATORY AUTHORITY DISPUTE RESOLUTION

In the Matter of the Arbitration of:

Timothy Charles Sullivan,

Claimant,

v.

Alamo Capital and FSC Securities Corporation,

Respondents.

STATEMENT OF ANSWER FOR RESPONDENT FSC SECURITIES CORPORATION

FSC Securities Corporation ("FSC" or "Respondent" or the "Firm") submits this Answer

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Case No. 18-01682

in response to the Statement of Claim, and request for expungement under the FINRA Code of

Arbitration Procedure Rules 13805 and 2080, filed by Timothy Charles Sullivan ("Claimant") in

the above-captioned matter.

RESPONSE TO LEGAL CLAIMS

FSC will not oppose Claimant's request for expungement of customer dispute

information pursuant to Rules 13805 and 2080. FSC defers to the arbitrator for a decision concerning the requisite elements under Rule 2080.

AFFIRMATIVE DEFENSES

1. Respondent reserves the right to seek attorneys' fees and arbitration costs, including FINRA member surcharges and/or fees, against Claimant pursuant to indemnity

provisions of the FSC Registered Representative agreement by and between Claimant and FSC.

Ibise May 20, 201

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TO:	Dochtor 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: Dochtor 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

Investor protection. Market integrity.

Office of Dispute Resolution West Regional Office 300 South Grand Avenue Suite 1700 Los Angeles, CA 90071-3135 t 213 613 2680 www.finra.org

Tim SullivAn William Rosenthal FINEA Sec





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

arris Freedman, Esq.

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