

## BrokerCheck Report

### OAK TREE SECURITIES, INC.

CRD# 18126

| <u>Section Title</u> | <u>Page(s)</u> |
|----------------------|----------------|
| Report Summary       | 1              |
| Firm Profile         | 2 - 6          |
| Firm History         | 7              |
| Firm Operations      | 8 - 13         |
| Disclosure Events    | 14             |



When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

Please contact FINRA with any concerns.

## About BrokerCheck®



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

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

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

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

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

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
  - o information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
  - o information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

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

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

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

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

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

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**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](http://brokercheck.finra.org)



For additional information about the contents of this report, please refer to the User Guidance or [www.finra.org/brokercheck](http://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](http://www.finra.org).



## OAK TREE SECURITIES, INC.

CRD# 18126

SEC# 8-36138

### Main Office Location

4049 FIRST STREET  
SUITE 129  
LIVERMORE, CA 94551-4949  
Regulated by FINRA San Francisco Office

### Mailing Address

4049 FIRST STREET  
SUITE 129  
LIVERMORE, CA 94551-4949

### Business Telephone Number

925-245-0570

This firm is a brokerage firm and an investment adviser firm. For more information about investment adviser firms, visit the SEC's Investment Adviser Public Disclosure website at:

<https://www.adviserinfo.sec.gov>

## Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

### Firm Profile

This firm is classified as a corporation.

This firm was formed in California on 04/30/1986.

Its fiscal year ends in April.

### Firm History

Information relating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

### Firm Operations

This firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 19 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? **No**

This firm conducts 11 types of businesses.

This firm is not affiliated with any financial or investment institutions.

This firm has referral or financial arrangements with other brokers or dealers.

### Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm? **Yes**

The following types of disclosures have been reported:

| Type             | Count |
|------------------|-------|
| Regulatory Event | 2     |



## Firm Profile

This firm is classified as a corporation.

This firm was formed in California on 04/30/1986.

Its fiscal year ends in April.

## Firm Names and Locations

This section provides the brokerage firm's full legal name, "Doing Business As" name, business and mailing addresses, telephone number, and any alternate name by which the firm conducts business and where such name is used.

**OAK TREE SECURITIES, INC.**

**Doing business as OAK TREE SECURITIES, INC.**

**CRD#** 18126

**SEC#** 8-36138

### Main Office Location

4049 FIRST STREET  
SUITE 129  
LIVERMORE, CA 94551-4949

**Regulated by FINRA San Francisco Office**

### Mailing Address

4049 FIRST STREET  
SUITE 129  
LIVERMORE, CA 94551-4949

### Business Telephone Number

925-245-0570



## Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

### Direct Owners and Executive Officers

**Legal Name & CRD# (if any):** QUESADA, DANIEL MARTINEZ

817404

**Is this a domestic or foreign entity or an individual?** Individual

**Position** PRESIDENT, CFO,

**Position Start Date** 01/2008

**Percentage of Ownership** 50% but less than 75%

**Does this owner direct the management or policies of the firm?** Yes

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** DAHL, ERIC DREW

735877

**Is this a domestic or foreign entity or an individual?** Individual

**Position** PRINCIPAL

**Position Start Date** 03/2004

**Percentage of Ownership** 5% but less than 10%

**Does this owner direct the management or policies of the firm?** No

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** LARSON, DENNIS ARTHUR

302868

**Is this a domestic or foreign entity or an individual?** Individual

**Position** REGISTERED REP

## Firm Profile



### Direct Owners and Executive Officers (continued)

|                                                                       |                      |
|-----------------------------------------------------------------------|----------------------|
| <b>Position Start Date</b>                                            | 03/2004              |
| <b>Percentage of Ownership</b>                                        | 5% but less than 10% |
| <b>Does this owner direct the management or policies of the firm?</b> | No                   |
| <b>Is this a public reporting company?</b>                            | No                   |

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|                                        |                                    |
|----------------------------------------|------------------------------------|
| <b>Legal Name &amp; CRD# (if any):</b> | WILLIAMS, PATRICIA JEAN<br>1006661 |
|----------------------------------------|------------------------------------|

|                                                               |            |
|---------------------------------------------------------------|------------|
| <b>Is this a domestic or foreign entity or an individual?</b> | Individual |
|---------------------------------------------------------------|------------|

|                 |           |
|-----------------|-----------|
| <b>Position</b> | PRINCIPAL |
|-----------------|-----------|

|                            |         |
|----------------------------|---------|
| <b>Position Start Date</b> | 03/2004 |
|----------------------------|---------|

|                                |                      |
|--------------------------------|----------------------|
| <b>Percentage of Ownership</b> | 5% but less than 10% |
|--------------------------------|----------------------|

|                                                                       |    |
|-----------------------------------------------------------------------|----|
| <b>Does this owner direct the management or policies of the firm?</b> | No |
|-----------------------------------------------------------------------|----|

|                                            |    |
|--------------------------------------------|----|
| <b>Is this a public reporting company?</b> | No |
|--------------------------------------------|----|

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|                                        |                                   |
|----------------------------------------|-----------------------------------|
| <b>Legal Name &amp; CRD# (if any):</b> | DURDEN, JOHN KENNETH JR<br>860423 |
|----------------------------------------|-----------------------------------|

|                                                               |            |
|---------------------------------------------------------------|------------|
| <b>Is this a domestic or foreign entity or an individual?</b> | Individual |
|---------------------------------------------------------------|------------|

|                 |                     |
|-----------------|---------------------|
| <b>Position</b> | FINANCIAL PRINCIPAL |
|-----------------|---------------------|

|                            |         |
|----------------------------|---------|
| <b>Position Start Date</b> | 01/2008 |
|----------------------------|---------|

|                                |              |
|--------------------------------|--------------|
| <b>Percentage of Ownership</b> | Less than 5% |
|--------------------------------|--------------|

|                                                                       |    |
|-----------------------------------------------------------------------|----|
| <b>Does this owner direct the management or policies of the firm?</b> | No |
|-----------------------------------------------------------------------|----|

|                                            |    |
|--------------------------------------------|----|
| <b>Is this a public reporting company?</b> | No |
|--------------------------------------------|----|

Firm Profile



Direct Owners and Executive Officers (continued)

|                                                                |                                     |
|----------------------------------------------------------------|-------------------------------------|
| Legal Name & CRD# (if any):                                    | GODINEZ, DAVID GREGORY<br>2086793   |
| Is this a domestic or foreign entity or an individual?         | Individual                          |
| Position                                                       | PRINCIPAL, CHIEF COMPLIANCE OFFICER |
| Position Start Date                                            | 01/2008                             |
| Percentage of Ownership                                        | Less than 5%                        |
| Does this owner direct the management or policies of the firm? | Yes                                 |
| Is this a public reporting company?                            | No                                  |

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## Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.

## Indirect Owners

No information reported.



## Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

No information reported.





## Firm Operations

### Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

**This firm is currently registered with the SEC, 1 SRO and 19 U.S. states and territories.**

| Federal Regulator | Status   | Date Effective |
|-------------------|----------|----------------|
| SEC               | Approved | 06/26/1986     |

### SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: Yes

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: No

| Self-Regulatory Organization | Status   | Date Effective |
|------------------------------|----------|----------------|
| FINRA                        | Approved | 07/24/1986     |



## Firm Operations

### Registrations (continued)

| U.S. States & Territories | Status   | Date Effective |
|---------------------------|----------|----------------|
| Arizona                   | Approved | 07/31/2008     |
| California                | Approved | 08/04/1986     |
| Colorado                  | Approved | 09/08/1999     |
| Florida                   | Approved | 06/04/2015     |
| Georgia                   | Approved | 02/23/2017     |
| Hawaii                    | Approved | 03/09/2001     |
| Idaho                     | Approved | 10/17/2006     |
| Iowa                      | Approved | 01/02/2024     |
| Kentucky                  | Approved | 02/14/2022     |
| Missouri                  | Approved | 09/14/2018     |
| Nevada                    | Approved | 06/08/1998     |
| New Mexico                | Approved | 08/14/2018     |
| Oregon                    | Approved | 06/15/2015     |
| South Carolina            | Approved | 05/09/2024     |
| Tennessee                 | Approved | 12/07/2015     |
| Texas                     | Approved | 03/02/2011     |
| Utah                      | Approved | 11/17/2025     |
| Washington                | Approved | 10/17/2023     |
| Wisconsin                 | Approved | 08/22/2011     |



## Firm Operations

### Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

**This firm currently conducts 11 types of businesses.**

#### Types of Business

|                                                                                                                                                                                                                                                                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Broker or dealer retailing corporate equity securities over-the-counter                                                                                                                                                                                                |
| Broker or dealer selling corporate debt securities                                                                                                                                                                                                                     |
| Mutual fund retailer                                                                                                                                                                                                                                                   |
| U S. government securities broker                                                                                                                                                                                                                                      |
| Municipal securities broker                                                                                                                                                                                                                                            |
| Broker or dealer selling variable life insurance or annuities                                                                                                                                                                                                          |
| Broker or dealer selling oil and gas interests                                                                                                                                                                                                                         |
| Investment advisory services                                                                                                                                                                                                                                           |
| Broker or dealer selling tax shelters or limited partnerships in primary distributions                                                                                                                                                                                 |
| Private placements of securities                                                                                                                                                                                                                                       |
| Other - 10T MR. QUESADA MAY BE INVOLVED AS A GENERAL PARTNER IN DIRECT PARTICIPATION PROGRAMS INVOLVING REAL ESTATE. OAK TREE SECURITIES OR MR. QUESADA IS NOT ENGAGED IN ANY OTHER TYPE OF BUSINESS OTHER THAN THOSE LISTED ON PG. 5 QUESTION 10; BEING (D) (J) (K) ( |

#### Other Types of Business

This firm does not effect transactions in commodities, commodity futures, or commodity options.

This firm does not engage in other non-securities business.

Non-Securities Business Description:

## Firm Operations



### Clearing Arrangements

This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

### Introducing Arrangements

This firm does refer or introduce customers to other brokers and dealers.

|                          |                                                                                                                                                                                                                    |
|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Name:</b>             | WEDBUSH SECURITIES INC.                                                                                                                                                                                            |
| <b>CRD #:</b>            | 877                                                                                                                                                                                                                |
| <b>Business Address:</b> | 1000 WILSHIRE BLVD.<br>LOS ANGELES, CA 90017                                                                                                                                                                       |
| <b>Effective Date:</b>   | 02/01/1991                                                                                                                                                                                                         |
| <b>Description:</b>      | WE HAVE A FULLY DISCLOSED AGREEMENT WITH WEDBUSH SECURITIES INC. WEDBUSH SECURITIES INC IS RESPONSIBLE FOR RECEIVING CLIENT CHECKS AND SECURITIES AND FOR MAILING CONFIRMATIONS AND MONTHLY STATEMENTS TO CLIENTS. |

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## Firm Operations

### Industry Arrangements



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**This firm does have books or records maintained by a third party.**

**Name:** WEDBUSH SECURITIES INC.  
**CRD #:** 877  
**Business Address:** 1000 WILSHIRE BLVD.  
LOS ANGELES, CA 90017  
**Effective Date:** 02/01/1991  
**Description:** WEDBUSH SECURITIES IS RESPONSIBLE FOR KEEPING AND  
MAINTAINING BOOKS AND RECORDS OF APPLICANT.

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**This firm does have accounts, funds, or securities maintained by a third party.**

**Name:** WEDBUSH SECURITIES INC.  
**CRD #:** 877  
**Business Address:** 1000 WILSHIRE BLVD.  
LOS ANGELES, CA 90017  
**Effective Date:** 02/01/1991  
**Description:** ACCOUNTS, FUNDS, AND/OR SECURITIES ARE HELD AND MAINTAINED  
BY WEDBUSH SECURITIES.

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**This firm does have customer accounts, funds, or securities maintained by a third party.**

**Name:** WEDBUSH SECURITIES INC.  
**CRD #:** 877  
**Business Address:** 1000 WILSHIRE BLVD.  
LOS ANGELES, CA 90017  
**Effective Date:** 02/01/1991  
**Description:** ACCOUNTS, FUNDS, AND/OR SECURITIES OF CUSTOMERS OF OAK  
TREE SECURITIES, INC. ARE HELD AND/OR MAINTAINED BY WEDBUSH  
SECURITIES.

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**Control Persons/Financing**

**This firm does not have individuals who control its management or policies through agreement.**

**This firm does not have individuals who wholly or partly finance the firm's business.**



## Firm Operations

### Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

**This firm is not, directly or indirectly:**

- in control of
  - controlled by
  - or under common control with
- the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.**

**This firm is not directly or indirectly, controlled by the following:**

- bank holding company
- national bank
- state member bank of the Federal Reserve System
- state non-member bank
- savings bank or association
- credit union
- or foreign bank



Disclosure Events

All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

|                  | Pending | Final | On Appeal |
|------------------|---------|-------|-----------|
| Regulatory Event | 0       | 2     | 0         |



## Disclosure Event Details

### What you should know about reported disclosure events:

1. **BrokerCheck provides details for any disclosure event that was reported in CRD. It also includes summary information regarding FINRA arbitration awards in cases where the brokerage firm was named as a respondent.**
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 brokerage firm is required to disclose a particular criminal event.
3. **Disclosure events in BrokerCheck reports come from different sources:**
  - o Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both 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.
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 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.
5. **You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.**

### Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

### Disclosure 1 of 2

**Reporting Source:** Regulator

**Current Status:** Final

**Allegations:**

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT VIOLATED RULE 30 OF REGULATION S-P BY FAILING TO ESTABLISH, MAINTAIN AND ENFORCE A SUPERVISORY SYSTEM, INCLUDING WSPS, REASONABLY DESIGNED TO ENSURE THE SECURITY OF CONFIDENTIAL CUSTOMER INFORMATION STORED ELECTRONICALLY, INCLUDING FAILING TO OVERSEE, SUPERVISE AND MONITOR THIRD-PARTY VENDORS INVOLVED WITH ITS PUBLIC WEBSITE. THE FINDINGS STATED THAT THE FIRM USED THE THIRD PARTY VENDORS TO CREATE AND HOST ITS PUBLIC WEBSITE, WHICH CONTAINED BOTH GENERAL INFORMATION ABOUT THE FIRM AND ALLOWED REGISTERED REPRESENTATIVES TO ACCESS FIRM SYSTEMS AND ACCOUNT INFORMATION. THE FIRM, HOWEVER, DID NOT HAVE ANY POLICIES AND PROCEDURES TO ENSURE THAT IT MAINTAINED THE CONFIDENTIALITY OF ITS CUSTOMERS' NONPUBLIC PERSONAL INFORMATION STORED AND ACCESSED ELECTRONICALLY. IN ADDITION, THE FIRM DID NOT HAVE POLICIES AND PROCEDURES IN PLACE TO ADEQUATELY SUPERVISE AND DID NOT ADEQUATELY SUPERVISE ITS THIRD PARTY VENDORS TO ENSURE THOSE VENDORS MAINTAINED THE CONFIDENTIALITY OF ITS CUSTOMERS' NONPUBLIC PERSONAL INFORMATION STORED AND ACCESSED ELECTRONICALLY. THE FIRM'S PURCHASE AND SALE BLOTTER WAS ACCESSIBLE THROUGH THE FIRM'S PUBLIC WEBSITE BY USING THE WEBSITE MAP OR BY MANUALLY ENTERING A SPECIFIC ADDRESS INTO A BROWSER. THE BLOTTER CONTAINED LINKS THAT LED TO A SERIES OF MENUS CONTAINING CLIENT NAMES THAT, IF SELECTED, CAUSED CUSTOMER ACCOUNT NUMBERS TO APPEAR, INCLUDING, IN LIMITED INSTANCES, ACCOUNT NUMBERS COMPRISED OF CUSTOMERS' SOCIAL SECURITY NUMBERS. DURING AT LEAST SEVEN DAYS, AN INTERNET SEARCH ENGINE ACCESSED THE FIRM'S PURCHASE AND SALE BLOTTER BY CRAWLING THROUGH THE FIRM'S PUBLIC WEBSITE. THUS, THE FIRM'S PUBLIC WEBSITE EXPOSED CUSTOMERS' NONPUBLIC PERSONAL INFORMATION-INCLUDING NAMES, ACCOUNT NUMBERS, AND SOCIAL SECURITY NUMBERS-FOR OVER 700 CUSTOMERS DURING THE RELEVANT PERIOD.

**Initiated By:** FINRA

**Date Initiated:** 09/28/2017

**Docket/Case Number:** [2015043455201](#)

**Principal Product Type:** No Product

**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:** Other



|                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Other Sanction(s)/Relief Sought:</b>                                                                                                                     | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Resolution:</b>                                                                                                                                          | Acceptance, Waiver & Consent(AWC)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Resolution Date:</b>                                                                                                                                     | 09/28/2017                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b> | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Sanctions Ordered:</b>                                                                                                                                   | Censure<br>Monetary/Fine \$50,000.00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Other Sanctions Ordered:</b>                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Sanction Details:</b>                                                                                                                                    | THE FIRM WAS CENSURED AND FINED \$50,000. FINES PAID IN FULL ON OCTOBER 16, 2017.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <hr/>                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Reporting Source:</b>                                                                                                                                    | Firm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Current Status:</b>                                                                                                                                      | Final                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Allegations:</b>                                                                                                                                         | WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT VIOLATED RULE 30 OF REGULATION S-P BY FAILING TO ESTABLISH, MAINTAIN AND ENFORCE A SUPERVISORY SYSTEM, INCLUDING WSPS, REASONABLY DESIGNED TO ENSURE THE SECURITY OF CONFIDENTIAL CUSTOMER INFORMATION STORED ELECTRONICALLY, INCLUDING FAILING TO OVERSEE, SUPERVISE AND MONITOR THIRD-PARTY VENDORS INVOLVED WITH ITS PUBLIC WEBSITE. THE FINDINGS STATED THAT THE FIRM USED THE THIRD PARTY VENDORS TO CREATE AND HOST ITS PUBLIC WEBSITE, WHICH CONTAINED BOTH GENERAL INFORMATION ABOUT THE FIRM AND ALLOWED REGISTERED REPRESENTATIVES TO ACCESS FIRM SYSTEMS AND ACCOUNT INFORMATION. THE FIRM, HOWEVER, DID NOT HAVE ANY POLICIES AND PROCEDURES TO ENSURE THAT IT MAINTAINED THE CONFIDENTIALITY OF ITS CUSTOMERS' NONPUBLIC PERSONAL INFORMATION STORED AND ACCESSED ELECTRONICALLY. IN ADDITION, THE FIRM DID NOT HAVE POLICIES AND PROCEDURES IN PLACE TO ADEQUATELY SUPERVISE AND DID NOT ADEQUATELY SUPERVISE ITS THIRD PARTY VENDORS TO ENSURE THOSE VENDORS MAINTAINED THE CONFIDENTIALITY OF ITS CUSTOMERS' NONPUBLIC PERSONAL INFORMATION STORED AND ACCESSED ELECTRONICALLY. THE FIRM'S PURCHASE AND SALE BLOTTER WAS ACCESSIBLE THROUGH THE FIRM'S PUBLIC WEBSITE BY USING THE WEBSITE MAP OR BY MANUALLY |



ENTERING A SPECIFIC ADDRESS INTO A BROWSER. THE BLOTTER CONTAINED LINKS THAT LED TO A SERIES OF MENUS CONTAINING CLIENT NAMES THAT, IF SELECTED, CAUSED CUSTOMER ACCOUNT NUMBERS TO APPEAR, INCLUDING, IN LIMITED INSTANCES, ACCOUNT NUMBERS COMPRISED OF CUSTOMERS' SOCIAL SECURITY NUMBERS. DURING AT LEAST SEVEN DAYS, AN INTERNET SEARCH ENGINE ACCESSED THE FIRM'S PURCHASE AND SALE BLOTTER BY CRAWLING THROUGH THE FIRM'S PUBLIC WEBSITE. THUS, THE FIRM'S PUBLIC WEBSITE EXPOSED CUSTOMERS' NONPUBLIC PERSONAL INFORMATION-INCLUDING NAMES, ACCOUNT NUMBERS, AND SOCIAL SECURITY NUMBERS-FOR OVER 700 CUSTOMERS DURING THE RELEVANT PERIOD.

**Initiated By:** FINRA

**Date Initiated:** 09/28/2017

**Docket/Case Number:** [2015043455201](#)

**Principal Product Type:** No Product

**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:** Other

**Other Sanction(s)/Relief Sought:** N/A

**Resolution:** Acceptance, Waiver & Consent(AWC)

**Resolution Date:** 09/28/2017

**Sanctions Ordered:** Censure  
Monetary/Fine \$50,000.00

**Other Sanctions Ordered:**

**Sanction Details:** THE FIRM WAS CENSURED AND FINED \$50,000

#### Disclosure 2 of 2

**Reporting Source:** Regulator

**Current Status:** Final

**Allegations:** UNREGISTERED INVESTMENT ADVISORY ACTIVITY.

**Initiated By:** HAWAII

**Date Initiated:** 11/01/2007

**Docket/Case Number:** SEU-2007-56

**URL for Regulatory Action:****Principal Product Type:** Equity Listed (Common & Preferred Stock)**Other Product Type(s):****Principal Sanction(s)/Relief Sought:** Civil and Administrative Penalt(ies) /Fine(s)**Other Sanction(s)/Relief Sought:****Resolution:** Consent**Resolution Date:** 12/08/2008**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?** No**Sanctions Ordered:** Monetary/Fine \$9,000.00**Other Sanctions Ordered:****Sanction Details:** ENTERED INTO A CONSENT ORDER WITH OAK TREE SECURITIES, INC; THE PENALTY OF \$9,000.00 WAS PAID IN FULL ON 12/08/08.**Reporting Source:** Firm**Current Status:** Final**Allegations:** THE FIRM INADVERTENTLY ALLOWED A REGISTERED REPRESENTATIVE TO ACT AS AN INVESTMENT ADVISOR IN HAWAII WITHOUT PROPER REGISTRATION IN THE STATE. THIS WAS BROUGHT TO THE FIRM'S ATTENTION AS A RESULT OF AN EXAMINATION CONDUCTED BY THE STATE'S SECURITIES ENFORCEMENT BRANCH. THE EXAM BEGAN IN 2007 AND CONCLUDED IN DECEMBER 2008.**Initiated By:** STATE OF HAWAII**Date Initiated:** 11/01/2007**Docket/Case Number:** SEU-2007-056**Principal Product Type:** Other**Other Product Type(s):** NO PRODUCT WAS INVOLVED IN THIS EXAMINATION.



|                                             |                                                                                                                                    |
|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| <b>Principal Sanction(s)/Relief Sought:</b> | Civil and Administrative Penalt(ies) /Fine(s)                                                                                      |
| <b>Other Sanction(s)/Relief Sought:</b>     |                                                                                                                                    |
| <b>Resolution:</b>                          | Consent                                                                                                                            |
| <b>Resolution Date:</b>                     | 12/08/2008                                                                                                                         |
| <b>Sanctions Ordered:</b>                   | Monetary/Fine \$9,000.00                                                                                                           |
| <b>Other Sanctions Ordered:</b>             |                                                                                                                                    |
| <b>Sanction Details:</b>                    | A FINE OF \$9000 WAS IMPOSED ON THE FIRM. THIS WAS PAID ON DECEMBER 4, 2008                                                        |
| <b>Firm Statement</b>                       | NO SANCTIONS WERE IMPOSED ON THE FIRM. THE FIRM AGREED TO PAY THE FINE OF \$9000 AND AGREED TO MONITOR REGISTRATIONS MORE CLOSELY. |

**End of Report**



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