

## BrokerCheck Report

## SEASONGOOD & MAYER

CRD# 3321

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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:
  - 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
  - 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).



SEASONGOOD & MAYER

CRD# 3321

SEC# 8-123

Main Office Location

414 WALNUT STREET  
SUITE 300  
CINCINNATI, OH 45202-3910

Mailing Address

414 WALNUT STREET  
SUITE 300  
CINCINNATI, OH 45202-3910

Business Telephone Number

513 621-2000

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 partnership.  
This firm was formed in Ohio on 02/01/1887.  
Its fiscal year ends in January.

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 brokerage firm is no longer registered with FINRA or a national securities exchange.

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	4

## Registration Withdrawal Information

This section provides information relating to the date the brokerage firm ceased doing business and the firm's financial obligations to customers or other brokerage firms.



**Date firm ceased business:** 06/15/2007

**Does this brokerage firm owe any money or securities to any customer or brokerage firm?** No



## Firm Profile

This firm is classified as a partnership.

This firm was formed in Ohio on 02/01/1887.

Its fiscal year ends in January.

## 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.

### SEASONGOOD & MAYER

Doing business as SEASONGOOD & MAYER

CRD# 3321

SEC# 8-123

### Main Office Location

414 WALNUT STREET  
SUITE 300  
CINCINNATI, OH 45202-3910

### Mailing Address

414 WALNUT STREET  
SUITE 300  
CINCINNATI, OH 45202-3910

### Business Telephone Number

513 621-2000



## 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):** MAIROSE, RICHARD LEE

317549

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

**Position** MANAGING SENIOR PRINCIPAL/CHIEF COMPLIANCE OFFICER

**Position Start Date** 02/2004

**Percentage of Ownership** 10% but less than 25%

**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):** REIS, RICHARD DAVID

373775

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

**Position** SENIOR PRINCIPAL

**Position Start Date** 02/2000

**Percentage of Ownership** 10% but less than 25%

**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):** STUBBINS, PAUL TALBOTT

1390110

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

**Position** SENIOR PRINCIPAL

## Firm Profile



### Direct Owners and Executive Officers (continued)

<b>Position Start Date</b>	02/2000
<b>Percentage of Ownership</b>	10% but less than 25%
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	BLANK, DANIEL RAYMOND 1370454
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	MANAGING SENIOR PRINCIPAL
<b>Position Start Date</b>	02/2005
<b>Percentage of Ownership</b>	5% but less than 10%
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	GOODWIN, LYNN EDWARD 2190558
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	SENIOR PRINCIPAL
<b>Position Start Date</b>	02/2001
<b>Percentage of Ownership</b>	5% but less than 10%
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	Yes

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## Firm Profile



### Direct Owners and Executive Officers (continued)

**Legal Name & CRD# (if any):** PERLMAN, SCOT DAVID  
1651118

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

**Position** SENIOR PRINCIPAL

**Position Start Date** 02/2000

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

**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):** BROWNING, MEGAN J  
4391180

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

**Position** LIMITED PRINCIPAL

**Position Start Date** 02/2005

**Percentage of Ownership** Less than 5%

**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):** CASHELL, KENTON SHARPLESS  
4583603

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

**Position** LIMITED PRINCIPAL

**Position Start Date** 02/2005

**Percentage of Ownership** Less than 5%



## Firm Profile



### Direct Owners and Executive Officers (continued)

**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):** CHAIKEN, BRUCE  
1710918

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

**Position** LIMITED PRINCIPAL

**Position Start Date** 02/2002

**Percentage of Ownership** Less than 5%

**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):** FRIEND, FORMAN JR  
1765666

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

**Position** LIMITED PRINCIPAL

**Position Start Date** 02/2002

**Percentage of Ownership** Less than 5%

**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):** GINNETTI, DONALD JOSEPH II  
1583589

## Firm Profile



### Direct Owners and Executive Officers (continued)

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

**Position** LIMITED PRINCIPAL

**Position Start Date** 02/2003

**Percentage of Ownership** Less than 5%

**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):** HAYES, CHRISTINE DAWN  
1303657

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

**Position** LIMITED PRINCIPAL

**Position Start Date** 02/2000

**Percentage of Ownership** Less than 5%

**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):** HEARN, JUDY DEAN  
1024709

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

**Position** LIMITED PRINCIPAL

**Position Start Date** 02/2000

**Percentage of Ownership** Less than 5%

## Firm Profile



### Direct Owners and Executive Officers (continued)

**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):** KALNOW, CARL FROST  
876529

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

**Position** LIMITED PRINCIPAL

**Position Start Date** 02/2000

**Percentage of Ownership** Less than 5%

**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):** MACK, STEPHAN SVEND  
2095246

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

**Position** LIMITED PRINCIPAL

**Position Start Date** 02/2003

**Percentage of Ownership** Less than 5%

**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):** REIS, THEA LAWRENCE  
1297289

## Firm Profile



### Direct Owners and Executive Officers (continued)

<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	LIMITED PRINCIPAL
<b>Position Start Date</b>	02/2000
<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

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**Legal Name & CRD# (if any):** ROBERTSON, JOSEPH MILAN  
2166214

<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	SENIOR PRINCIPAL
<b>Position Start Date</b>	02/2005
<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

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**Legal Name & CRD# (if any):** STEWART, TERRI LYNN  
2510137

<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	LIMITED PRINCIPAL
<b>Position Start Date</b>	02/2004
<b>Percentage of Ownership</b>	Less than 5%

## Firm Profile



### Direct Owners and Executive Officers (continued)

**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):** STUBBINS, SCOTT TALBOT  
3179345

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

**Position** LIMITED PRINCIPAL

**Position Start Date** 02/2005

**Percentage of Ownership** Less than 5%

**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):** SUNNENBERG, TERRY A  
1047055

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

**Position** LIMITED PRINCIPAL

**Position Start Date** 02/2000

**Percentage of Ownership** Less than 5%

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

**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 no longer registered.**

**The firm's registration was from 01/26/1937 to 09/14/2007.**



## 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 7 types of businesses.**

#### Types of Business

Broker or dealer retailing corporate equity securities over-the-counter
Broker or dealer selling corporate debt securities
Underwriter or selling group participant (corporate securities other than mutual funds)
Municipal securities dealer
Municipal securities broker
Trading securities for own account
Private placements of securities

## **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 not refer or introduce customers to other brokers and dealers.**

## **Firm Operations**

### **Industry Arrangements**



**This firm does not have books or records maintained by a third party.**

**This firm does not have accounts, funds, or securities maintained by a third party.**

**This firm does not have customer accounts, funds, or securities maintained by a third party.**

#### **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	4	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:**
  - 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:**
  - 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:**
  - 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.
  - 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 4

**Reporting Source:** Regulator

**Current Status:** Final



**Allegations:** MSRB RULES G-14, G-27 - SEASONGOOD & MAYER FAILED TO SUBMIT MUNICIPAL TRANSACTION INFORMATION WITHIN 15 MINUTES OF EXECUTION; AND FAILED TO ESTABLISH WRITTEN SUPERVISORY PROCEDURES TO ADDRESS THE REPORTING REQUIREMENTS OF MSRB RULE G-14.

**Initiated By:** NASD

**Date Initiated:** 12/19/2006

**Docket/Case Number:** E8A2005018503

**Principal Product Type:** Debt - Municipal

**Other Product Type(s):**

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

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

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

**Resolution Date:** 12/19/2006

**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 \$7,500.00

**Other Sanctions Ordered:**

**Sanction Details:** WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTION AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS FINED \$7,500.

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** MSRB RULES G-14, G-27 - SEASONGOOD & MAYER FAILED TO SUBMIT MUNICIPAL TRANSACTION INFORMATION WITHIN 15 MINUTES OF EXECUTION; AND FAILED TO ESTABLISH WRITTEN SUPERVISORY PROCEDURES TO ADDRESS THE REPORTING REQUIREMENTS OF MSRB RULE G-14



**Initiated By:** NASD

**Date Initiated:** 12/19/2006

**Docket/Case Number:** E8A2005018503

**Principal Product Type:** Debt - Municipal

**Other Product Type(s):**

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

**Other Sanction(s)/Relief Sought:** MONETARY/FINE

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

**Resolution Date:** 12/19/2006

**Sanctions Ordered:** Monetary/Fine \$7,500.00

**Other Sanctions Ordered:**

**Sanction Details:** WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FRIM CONSENTED TO THE DESCRIBED SANCTION AND TO THE ENTRY OF FINDINGS; THEREFORE THE FIRM WAS FINED \$7,500.

**Firm Statement** DURING A NORMAL AUDIT THE NASD FOUND 4 TRADES OUT OF 80 CHECKED THAT APPEARED TO BE OUTSIDE THE 15 MINUTE REPORTING PERIOD.

#### Disclosure 2 of 4

**Reporting Source:** Regulator

**Current Status:** Final

**Allegations:** THE ORDER FINDS THAT SEASONGOOD FAILED TO SUPERVISE BRAMBLE IN THAT IT FAILED TO DEVELOP AND IMPLEMENT ADEQUATE PROCEDURES REGARDING, AMONG OTHER THINGS, BACK OFFICE OPERATIONS, SALES PRACTICES, RECEIPT AND DELIVERY OF BEARER BONDS, ADDRESS CHANGES, ACCESS TO SENSITIVE CUSTOMER DOCUMENTS, CUSTOMER COMPLAINTS AND REVIEW OF OUTGOING MAIL. REIS, BRAMBLE'S DIRECT SUPERVISOR, FAILED TO SUPERVISE BRAMBLE IN THAT HE, AMONG OTHER THINGS, FAILED TO ADEQUATELY TRAIN BRAMBLE, OVERSEE BRAMBLE'S DAY-TO-DAY ACTIVITIES.

**Initiated By:** UNITED STATES SECURITIES AND EXCHANGE COMMISSION

**Date Initiated:** 09/30/1999





<b>Docket/Case Number:</b>	REL. 34-41956; FILE NO. 3-10061
<b>Principal Product Type:</b>	Other
<b>Other Product Type(s):</b>	BONDS
<b>Principal Sanction(s)/Relief Sought:</b>	Censure
<b>Other Sanction(s)/Relief Sought:</b>	(1)ORDERED TO COMMENCE REMEDIAL UNDERTAKINGS, AND (2) TO PAY A FINE OF \$50,000.
<b>Resolution:</b>	Consent
<b>Resolution Date:</b>	09/30/1999
<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$50,000.00
<b>Other Sanctions Ordered:</b>	ORDERED TO COMMENCE REMEDIAL UNDERTAKINGS.
<b>Sanction Details:</b>	(1) SEASONGOOD WAS CENSURED AND ORDERED TO COMMENCE REMEDIAL UNDERTAKINGS, AND (2) TO PAY A FINE OF \$50,000.
<b>Regulator Statement</b>	+10/14/1999+ SEC NEWS DIGEST, ISSUE NO. 99-190, DATED 10/01/1999, ENFORCEMENT PROCEEDINGS DISCLOSES: ON SEPTEMBER 30, THE COMMISSION ISSUED AN ORDER SANCTIONING SEASONGOOD & MAYER (SEASONGOOD), A REGISTERED BROKER-DEALER AND MUNICIPAL SECURITIES DEALER LOCATED IN CINCINNATI, OHIO, AND RICHARD D. REIS (REIS), A GENERAL PARTNER OF THE FIRM, FOR FAILING TO SUPERVISE WILLIAM J. BRAMBLE, JR. (BRAMBLE), A REGISTERED REPRESENTATIVE ASSOCIATED WITH THE FIRM. BRAMBLE MISAPPROPRIATED APPROXIMATELY \$2 MILLION IN MUNICIPAL BEARER BONDS FROM HIS CUSTOMERS. IN THE ORDER, THE COMMISSION FOUND THAT BETWEEN 1990 AND AUGUST 1996, BRAMBLE ENGAGED IN A SCHEME TO DEFRAUD IN WHICH HE MISAPPROPRIATED SIX CUSTOMERS' MUNICIPAL BEARER BONDS. BRAMBLE PERPETUATED AND CONCEALED HIS FRAUD BY, AMONG OTHER THINGS, OPENING ACCOUNTS AT SEASONGOOD TO SELL CERTAIN MISAPPROPRIATED BEARER BONDS TO HIS CUSTOMERS. THE ORDER FURTHER FINDS THAT SEASONGOOD FAILED TO SUPERVISE BRAMBLE IN THAT IT FAILED TO DEVELOP AND IMPLEMENT ADEQUATE PROCEDURES REGARDING, AMONG OTHER THINGS, BACK OFFICE OPERATIONS, SALES PRACTICES, RECEIPT AND DELIVERY OF BEARER BONDS, ADDRESS CHANGES, ACCESS TO SENSITIVE CUSTOMER DOCUMENTS, CUSTOMER COMPLAINTS AND REVIEW OF OUTGOING MAIL. REIS, BRAMBLE'S DIRECT SUPERVISOR, FAILED TO SUPERVISE BRAMBLE IN THAT HE, AMONG OTHER THINGS, FAILED TO ADEQUATELY TRAIN BRAMBLE, OVERSEE BRAMBLE'S DAY-TO-DAY ACTIVITIES OR REVIEW BRAMBLE'S ACCOUNTS AND IGNORED OR FAILED TO RECOGNIZE RED FLAGS REGARDING BRAMBLE'S CONDUCT.



SEASONGOOD AND REIS CONSENTED TO THE COMMISSION'S ORDER WITHOUT ADMITTING OR DENYING THE FINDINGS CONTAINED IN THE ORDER, EXCEPT JURISDICTIONAL FINDINGS, WHICH WERE ADMITTED. SEASONGOOD WAS CENSURED AND ORDERED TO COMMENCE REMEDIAL UNDERTAKINGS AND TO PAY A FINE OF \$50,000. REIS WAS SUSPENDED FOR SIX MONTHS, BARRED IN A SUPERVISORY CAPACITY FOR AN ADDITIONAL TWO YEARS AND ORDERED TO PAY A CIVIL PENALTY OF \$20,000. (REL. 34-41956; FILE NO. 3-10061)

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Reporting Source:	Firm
Current Status:	Final
Allegations:	WILLIAM BRAMBLE DEFRAUDED SIX CUSTOMERS BEARER BONDS IN THE AMOUNT 2 MILLION APPROX. BRAMBLE SCHEMED WITH ANOTHER BROKER DEALER TO MARGIN & LIQUIDATE THE SECURITIES. BRAMBLE CREATED FALSE CUSTOMER STATEMENTS,CONFIRMS& RECEIPTS USING AUTHENTIC LOOKING MATERIALS HE OBTAINED FROM THE BACK OFFICE.
Initiated By:	SECURITIES & EXCHANGE COMMISSION DANIEL R GREGUS
Date Initiated:	09/30/1999
Docket/Case Number:	3-10061
Principal Product Type:	Debt - Municipal
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	CIVIL PENALTY \$50,000 UNDERTAKINGS RICHARD D REIS SUSPENDED AND SUPERVISORY BAR \$20,000 CIVIL PENALTY
Resolution:	Order
Resolution Date:	09/30/1999
Sanctions Ordered:	Censure Monetary/Fine \$70,000.00 Suspension Bar
Other Sanctions Ordered:	
Sanction Details:	RICHARD D REIS SUSPENSION 6 MONTHS SUPERVISORY BAR 2 YEARS AFTER SUSPENSION COMPLETED AND CIVIL PENALTY \$20,000.(GEN SEC PRINCIPAL)EFFECTIVE DATE OCTOBER 11,1999

**Disclosure 3 of 4**

<b>Reporting Source:</b>	Regulator
<b>Current Status:</b>	Final
<b>Allegations:</b>	MSRB G-37 - RESPONDENT MEMBER FAILED TO ADOPT, MAINTAIN, AND ENFORCE AN ADEQUATE SUPERVISORY SYSTEM TO ENSURE THAT INDIVIDUALS WERE PROPERLY REGISTERED TO PERFORM ACTIVITIES IN WHICH THEY WERE ENGAGED, IN THAT THE FIRM HAD NO WRITTEN SUPERVISORY PROCEDURES GOVERNING REGISTRATION AND THE FIRM PERMITTED AN INDIVIDUAL TO ENGAGE IN ACTIVITIES REQUIRING REGISTRATION AS A MUNICIPAL SECURITIES REPRESENTATIVE WITHOUT BEING REGISTERED IN THAT CAPACITY.
<b>Initiated By:</b>	NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
<b>Date Initiated:</b>	03/16/1999
<b>Docket/Case Number:</b>	C8B990007
<b>Principal Product Type:</b>	No Product
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Resolution Date:</b>	03/16/1999
<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 Monetary/Fine \$20,000.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RESPONDENT FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED AND FINED \$20,000.



<b>Reporting Source:</b>	Firm
<b>Current Status:</b>	Final
<b>Allegations:</b>	VIOLATIUN OF MSRB RULE G-27.
<b>Initiated By:</b>	N A S D CLEVELAND DISTRICT #8
<b>Date Initiated:</b>	03/16/1999
<b>Docket/Case Number:</b>	C8B990007
<b>Principal Product Type:</b>	Debt - Municipal
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Censure
<b>Other Sanction(s)/Relief Sought:</b>	\$20,000 FINE
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Resolution Date:</b>	03/16/1999
<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$20,000.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	AWC SIGNED AND \$20,000 FINE PAID MARCH 29, 1999

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#### Disclosure 4 of 4

<b>Reporting Source:</b>	Regulator
<b>Current Status:</b>	Final
<b>Allegations:</b>	
<b>Initiated By:</b>	NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
<b>Date Initiated:</b>	07/01/1974
<b>Docket/Case Number:</b>	N-V5-49
<b>Principal Product Type:</b>	
<b>Other Product Type(s):</b>	



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

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

**Resolution:** Decision

**Resolution Date:** 08/29/1974

**Sanctions Ordered:** Monetary/Fine \$25.00

**Other Sanctions Ordered:**

**Sanction Details:**

**Regulator Statement** N-V5-49 FILED 07/01/74  
08/29/74 FINED \$25  
PD.

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** THERE IS NOT ANY INFORMATION AVAILABLE REGARDING THIS FINE.

**Initiated By:** NASD CLEVELAND OHIO

**Date Initiated:** 07/01/1974

**Docket/Case Number:** N-V5-49

**Principal Product Type:** Debt - Municipal

**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:** Civil and Administrative Penalt(ies) /Fine(s)

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

**Resolution:** Settled

**Resolution Date:** 07/01/1974

**Sanctions Ordered:** Monetary/Fine \$25.00

**Other Sanctions Ordered:**

**Sanction Details:** THERE IS NOT ANY INFORMATION AVAILABLE REGARDING THE FINE ON  
JULY 1,1974.

**End of Report**



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