

BrokerCheck Report

SOURCE CAPITAL GROUP, INC.

CRD# 36719

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About BrokerCheck®



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

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

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

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

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

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

- **How current is this information?**

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

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

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

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

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

Thank you for using FINRA BrokerCheck.



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

brokercheck.finra.org



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

[For more information about FINRA, visit www.finra.org.](http://www.finra.org)



SOURCE CAPITAL GROUP, INC.

CRD# 36719

SEC# 8-47372

Main Office Location

276 POST ROAD WEST
WESTPORT, CT 06880

Mailing Address

276 POST ROAD WEST
WESTPORT, CT 06880

Business Telephone Number

203-341-3500

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 Delaware on 06/03/1994.

Its fiscal year ends in December.

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	9
Arbitration	3



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.

This firm terminated or withdrew registration on:	02/02/2017
Does this brokerage firm owe any money or securities to any customer or brokerage firm?	Yes
Number of customers owed funds or securities:	1
Amount of money owed to customer:	\$1,200,000.00
Amount of money owed to brokerage firm:	\$0.00
Market value of securities owed to customer:	\$0.00
Market value of securities owed to brokerage firm:	\$0.00
Payment arrangement:	IN 30 DAY PERIOD AFTER ARBITRATION AWARD. WE HAVE TRIED TO REACH SETTLEMENT.



Firm Profile

This firm is classified as a corporation.

This firm was formed in Delaware on 06/03/1994.

Its fiscal year ends in December.

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.

SOURCE CAPITAL GROUP, INC.

Doing business as SOURCE CAPITAL GROUP, INC.

CRD# 36719

SEC# 8-47372

Main Office Location

276 POST ROAD WEST
WESTPORT, CT 06880

Mailing Address

276 POST ROAD WEST
WESTPORT, CT 06880

Business Telephone Number

203-341-3500



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):	HARRIS, DAVID WEBSTER 237802
Is this a domestic or foreign entity or an individual?	Individual
Position	PRESIDENT / CHIEF COMPLIANCE OFFICER - INTERIM
Position Start Date	06/1994
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

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 10/13/1994 to 04/24/2017.



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 14 types of businesses.

Types of Business

Broker or dealer making inter-dealer markets in corporation securities over-the-counter

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)

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

Put and call broker or dealer or option writer

Investment advisory services

Broker or dealer selling tax shelters or limited partnerships in primary distributions

Trading securities for own account

Private placements of securities

Other Types of Business

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

This firm does engage in other non-securities business.

Non-Securities Business Description: RIA

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.

Name:	STERNE, AGEE & LEACH, INC.
CRD #:	791
Business Address:	800 SHADES CREEK PARKWAY SUITE 700 BIRMINGHAM, AL 35209
Effective Date:	08/24/2014
Description:	ALL ACCOUNTS WITH SOURCE CAPITAL CLEARED THROUGH A FULLY DISCLOSED BASIS.

Firm Operations

Industry Arrangements



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

Name: INVESTIGO BROADRIDGE
Business Address: P.O. BOX 1342
 BRENTWOOD, NY 11717
Effective Date: 07/01/2015
Description: INVESTMENT ADVISOR PLATFORM DESIGNED TO CONSOLIDATE DATA FROM MULTIPLE CLEARING FIRMS, CUSTODIANS, INSURANCE CARRIERS AND OTHER SOURCES INTO A CENTRAL REPOSITORY.

Name: STERNE, AGEE & LEACH, INC.
CRD #: 791
Business Address: 800 SHADES CREEK PARKWAY
 SUITE 700
 BIRMINGHAM, AL 35209
Effective Date: 08/24/2014
Description: CERTAIN BOOKS AND RECORDS ARE MAINTAINED BY STERNE AGEE & LEACH, INC.ON BEHALF OF SOURCE CAPITAL GROUP, INC. PURSUANT TO THE CLEARING AGREEMENT BETWEEN THE PARTIES.

Name: GLOBAL RELAY COMMUNICATIONS, INC.
Business Address: 286 MADISON AVENUE
 7TH FLOOR
 NEW YORK, NY 10017
Effective Date: 06/01/2014
Description: MAINTAIN ALL SOURCE CAPITAL EMAIL.

Name: VISTAONE SOLUTIONS
Business Address: 40 FULTON STREET
 11TH FLOOR
 NEW YORK, NY 10038
Effective Date: 01/01/2006
Description: USED FOR TRADE REPORTING UNDER SEC RULE 606.

Name: COMPUPAY/BENEFIT MALL
Business Address: 5 DEPOT STREET

Firm Operations



Industry Arrangements (continued)

	BOX 2 FREEPORT, ME 04032
Effective Date:	01/01/2008
Description:	USED FOR PAYROLL PURPOSES. THEY MAINTAIN PAYROLL RECORDS AND PREPARE W-2S AND 1099S FOR EMPLOYEES AND REGISTERED REPRESENTATIVES.
Name:	STERLING INFOSYSTEMS, INC.
Business Address:	ONE STATE STREET 24TH FLOOR NEW YORK, NY 10004
Effective Date:	07/01/2014
Description:	USED FOR BACKGROUND CHECKS OF PROSPECTIVE NEW REGISTERED REPRESENTATIVES.
Name:	CITRIX SYSTEMS, INC.
Business Address:	120 SOUTH WEST STREET RALEIGH, NC 27603
Effective Date:	04/01/2013
Description:	USED TO MAINTAIN CERTAIN INVESTMENT BANKING/DIRECT INVESTMENT RELATED PAPERWORK.
Name:	WOLTERS KLUWER FINANCIAL SERVICES
Business Address:	100 SOUTH 5TH STREET SUITE 700 MINNEAPOLIS, MN 55402-1466
Effective Date:	01/01/2006
Description:	ONESUMX GRC - COMPLIANCE PROGRAM MANAGEMENT: USED TO MAINTAIN/UPDATE WRITTEN SUPERVISORY PROCEDURES MANUAL
Name:	QUEST CONTINUING EDUCATION SOLUTIONS, LLC
Business Address:	10850 WEST PARK PLACE SUITE 1000 MILWAUKEE, WI 53224
Effective Date:	01/01/2012
Description:	ELECTRONIC SYSTEM USED TO TRACK ANNUAL CONTINUE EDUCATION REQUIREMENTS, ANNUAL COMPLIANCE MEETING, ANNUAL COMPLIANCE QUESTIONNAIRE, ETC. OF REGISTERED INDIVIDUALS.

Firm Operations



Industry Arrangements (continued)

Name: DBCOM CONSULTING, INC.
Business Address: 2 RESEARCH WAY
PRINCETON, NJ 08540
Effective Date: 04/01/2015
Description: EQUBE - SYSTEM USED FOR ELECTRONIC GATHERING OF
INFORMATION RELATING TO COMPLIANCE ISSUES AND MONITORING
OF AML AND TRADING ACTIVITIES.

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	9	0
Arbitration	N/A	3	N/A



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 9

Reporting Source: Regulator
Current Status: Final



Allegations: RESPONDENT SOURCE CAPITAL GROUP, INC. FAILED TO COMPLY WITH AN ARBITRATION AWARD OR SETTLEMENT AGREEMENT OR TO SATISFACTORILY RESPOND TO A FINRA REQUEST TO PROVIDE INFORMATION CONCERNING THE STATUS OF COMPLIANCE.

Initiated By: FINRA

Date Initiated: 04/10/2017

Docket/Case Number: [16-00147](#)

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Suspension

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 04/10/2017

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: Suspension

Other Sanctions Ordered:

Sanction Details: PURSUANT TO ARTICLE VI, SECTION 3 OF FINRA BY-LAWS, AND FINRA RULE 9554, RESPONDENT SOURCE CAPITAL GROUP, INC.'S FINRA MEMBERSHIP IS SUSPENDED ON APRIL 10, 2017 FOR FAILURE TO COMPLY WITH AN ARBITRATION AWARD OR SETTLEMENT AGREEMENT OR TO SATISFACTORILY RESPOND TO A FINRA REQUEST TO PROVIDE INFORMATION CONCERNING THE STATUS OF COMPLIANCE.

Reporting Source: Firm

Current Status: Final

Allegations: RESPONDENT SOURCE CAPITAL GROUP, INC. FAILED TO COMPLY WITH AN ARBITRATION AWARD OR SETTLEMENT AGREEMENT OR TO SATISFACTORILY RESPOND TO A FINRA REQUEST TO PROVIDE INFORMATION CONCERNING THE STATUS OF COMPLIANCE.



Initiated By: FINRA
Date Initiated: 04/10/2017
Docket/Case Number: [16-00147](#)
Principal Product Type: No Product
Other Product Type(s):
Principal Sanction(s)/Relief Sought: Suspension
Other Sanction(s)/Relief Sought:
Resolution: Other
Resolution Date: 04/10/2017
Sanctions Ordered: Suspension
Other Sanctions Ordered:
Sanction Details: PURSUANT TO ARTICLE VI, SECTION 3 OF FINRA BY-LAWS, AND FINRA RULE 9554, RESPONDENT SOURCE CAPITAL GROUP, INC.'S FINRA MEMBERSHIP IS SUSPENDED ON APRIL 10, 2017 FOR FAILURE TO COMPLY WITH AN ARBITRATION AWARD OR SETTLEMENT AGREEMENT OR TO SATISFACTORILY RESPOND TO A FINRA REQUEST TO PROVIDE INFORMATION CONCERNING THE STATUS OF COMPLIANCE.

Disclosure 2 of 9

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 SOLD CORPORATE BONDS TO CUSTOMERS AND FAILED TO SELL SUCH BONDS AT A PRICE THAT WAS FAIR, TAKING INTO CONSIDERATION ALL RELEVANT CIRCUMSTANCES, INCLUDING MARKET CONDITIONS WITH RESPECT TO EACH BOND AT THE TIME OF THE TRANSACTION, THE EXPENSE INVOLVED AND THAT THE FIRM WAS ENTITLED TO A PROFIT.

Initiated By: FINRA
Date Initiated: 05/05/2015
Docket/Case Number: [2013038256401](#)
Principal Product Type: Debt - Corporate

**Other Product Type(s):****Principal Sanction(s)/Relief Sought:****Other Sanction(s)/Relief Sought:****Resolution:** Acceptance, Waiver & Consent(AWC)**Resolution Date:** 05/05/2015**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:** Censure
Monetary/Fine \$5,000.00
Disgorgement/Restitution**Other Sanctions Ordered:****Sanction Details:** THE FIRM WAS CENSURED, FINED \$5,000 AND ORDERED TO PAY RESTITUTION IN THE AMOUNT OF \$1,524.97, PLUS INTEREST, TO THE CUSTOMERS. FINE PAID IN FULL ON 5/18/2015.**Reporting Source:** Firm**Current Status:** Final**Allegations:** WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT SOLD CORPORATE BONDS TO CUSTOMERS AND FAILED TO SELL SUCH BONDS AT A PRICE THAT WAS FAIR, TAKING INTO CONSIDERATION ALL RELEVANT CIRCUMSTANCES, INCLUDING MARKET CONDITIONS WITH RESPECT TO EACH BOND AT THE TIME OF THE TRANSACTION, THE EXPENSE INVOLVED AND THAT THE FIRM WAS ENTITLED TO A PROFIT.**Initiated By:** FINRA**Date Initiated:** 05/05/2015**Docket/Case Number:** [2013038256401](#)**Principal Product Type:** Debt - Corporate**Other Product Type(s):**



Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 05/05/2015

Sanctions Ordered: Censure
Monetary/Fine \$5,000.00
Disgorgement/Restitution

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED, FINED \$5,000 AND ORDERED TO PAY RESTITUTION IN THE AMOUNT OF \$1,524.97, PLUS INTEREST, TO THE CUSTOMERS.

Disclosure 3 of 9

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 THE FIRM, THROUGH ITS BRANCH OFFICE MANAGER, SOLD OR CAUSED THE SALE OF INVESTMENTS OF AN ENTITY WITHOUT ADEQUATELY DISCLOSING MATERIAL INFORMATION TO INVESTORS. THE FINDINGS STATED THAT AT TIMES, THE ENTITY GAVE MONEY TO THE BRANCH OFFICE MANAGER THAT HE USED TO PAY THE FIRM'S REPRESENTATIVES A \$2,000 MONTHLY SALARY IN ADVANCE OF THEIR DRAWS. SOME BROKERS DID NOT REPAY THE SALARY ADVANCES. THE ENTITY SECURITIES' OFFERING DOCUMENTS DID NOT ADEQUATELY DISCLOSE THAT THE ENTITY WAS INDIRECTLY COMPENSATING THE FIRM'S REGISTERED REPRESENTATIVES THROUGH ITS BRANCH OFFICE MANAGER, AND THIS WAS A MATERIAL OMISSION. THE DESIGNATED SUPERVISOR OF THE BRANCH OFFICE MANAGER AND OF THE BRANCH FAILED TO SUPERVISE THE ACTIVITIES IN THE BRANCH. HE IMPROPERLY DELEGATED SUPERVISION OF THE BRANCH TO THIS BRANCH OFFICE MANAGER, AND HE FAILED ADEQUATELY TO OVERSEE THE BRANCH. THE FINDINGS ALSO STATED THAT TO SOLICIT INVESTMENTS IN PRIVATE OFFERINGS OF OIL AND GAS SECURITIES BY AN ENTITY, THE FIRM, THROUGH TWO OF ITS BROKERS, MADE EXAGGERATED PROMISES, IN MULTIPLE EMAILS, TO CUSTOMERS REGARDING THE OIL AND GAS INTERESTS TO BE ACQUIRED BY THE ENTITY'S PARTNERSHIPS. THESE EMAILS WERE COMMUNICATIONS WITH



THE PUBLIC, THEREFORE, THE FIRM, THROUGH ITS BROKERS, WERE REQUIRED TO ENSURE THAT ALL SUCH COMMUNICATIONS TO BE FAIR AND BALANCED, AND PROHIBIT EXAGGERATED, UNWARRANTED AND MISLEADING STATEMENTS AND CLAIMS.

Initiated By: FINRA

Date Initiated: 07/14/2014

Docket/Case Number: [2008011771602](#)

Principal Product Type: Other

Other Product Type(s): PRIVATE OFFERINGS OF OIL AND GAS SECURITIES

Principal Sanction(s)/Relief Sought: Other

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

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 07/14/2014

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: Censure
Monetary/Fine \$100,000.00

Other Sanctions Ordered:

Sanction Details: SEE ABOVE. FINES PAID IN FULL ON 5/5/2017.

Reporting Source: Firm

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT THE FIRM, THROUGH ITS BRANCH OFFICE MANAGER, SOLD OR CAUSED THE SALE OF INVESTMENTS OF AN ENTITY WITHOUT ADEQUATELY DISCLOSING MATERIAL INFORMATION TO INVESTORS. THE FINDINGS ALSO STATED THAT TO SOLICIT INVESTMENTS IN PRIVATE OFFERINGS OF OIL AND GAS SECURITIES BY AN ENTITY, THE FIRM, THROUGH TWO OF ITS BROKERS, MADE EXAGGERATED PROMISES TO CUSTOMERS REGARDING THE OIL



AND GAS INTERESTS TO BE ACQUIRED BY THE ENTITY'S PARTNERSHIPS.

Initiated By: FINRA

Date Initiated: 07/14/2014

Docket/Case Number: [2008011771602](#)

Principal Product Type: Other

Other Product Type(s): PRIVATE OFFERINGS OF OIL AND GAS SECURITIES

Principal Sanction(s)/Relief Sought: Other

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

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 07/14/2014

Sanctions Ordered: Censure
Monetary/Fine \$100,000.00

Other Sanctions Ordered:

Sanction Details: SEE ABOVE

Disclosure 4 of 9

Reporting Source: Regulator

Current Status: Final

Allegations: SEC RULE 17A-3, FINRA RULES 2010, 6730(A), 6730(C)(8), NASD RULE 3110 - SOURCE CAPITAL GROUP, INC. FAILED TO RECORD THE CORRECT TIME OF TRADE EXECUTION FOR TRANSACTIONS IN TRADE REPORTING AND COMPLIANCE ENGINE (TRACE)-ELIGIBLE SECURITIES WHICH RESULTED IN: THE FIRM FAILED TO REPORT TO TRACE TRANSACTIONS IN TRACE-ELIGIBLE SECURITIES WITHIN 15 MINUTES OF THE EXECUTION TIME; THE FIRM FAILED TO REPORT TO TRACE THE CORRECT TIME OF TRADE EXECUTION FOR TRANSACTIONS IN TRACE-ELIGIBLE SECURITIES; AND THE FIRM FAILED TO SHOW THE CORRECT TIME OF EXECUTION ON THE MEMORANDUM OF BROKERAGE ORDERS. THIS CONDUCT CONSTITUTES A PATTERN OR PRACTICE OF LATE REPORTING WITHOUT EXCEPTIONAL CIRCUMSTANCES IN VIOLATION OF FINRA RULE 2010 AND SEPARATE AND DISTINCT VIOLATIONS OF SEC RULE 17A-3, FINRA RULES 6730(A) AND 6730(C)(8) AS WELL AS NASD RULE 3110.

Initiated By: FINRA



Date Initiated: 12/16/2011

Docket/Case Number: [2010024504301](#)

Principal Product Type: Other

Other Product Type(s): TRACE-ELIGIBLE SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 12/16/2011

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: Censure
Monetary/Fine \$12,500.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED AND FINED \$12,500. FINE PAID IN FULL JANUARY 4, 2012.

Reporting Source: Firm

Current Status: Final

Allegations: SEC RULE-17A-3,FINRA RULES 2010,6730(A),6730(C)(8),NASD RULE 3110-SOURCE CAPITAL GROUP,INC.FAILED TO RECORD THE CORRECT TIME OF TRADE EXECUTION FOR TRANSACTIONS IN TRADE REPORTING AND COMPLIANCE ENGINE(TRACE)-ELIGIBLE SECURITIES WHICH RESULTED IN :THE FIRM FAILED TO REPORT TRACE TRANSACTIONS IN TRACE-ELIGIBLE SECURITIES WITHIN 15 MINUTES OF THE EXECUTION TIME;THE FIRM FAILED TO REPORT TO TRACE THE TIME OF TRADE EXECUTION FOR TRANSACTIONSIN TRACE-ELIGIBLE SECURITIES;AND THE FIRM FAILED TO SHOW THE CORRECT TIME OF EXECUTION ON THE MEMOORANDUM OF BROKERAGE ORDERS. THIS CONDUCT CONSTITUTES A PATTERN OR PRACTICE OF LATE REPORTING WITHOUT EXCEPTIONAL



CIRCUMSTANCES IN VIOLATION OF IN FINRA RULE 2010 AND SEPARATE AND DISTINCT VIOLATIONS OF SEC RULE 17A-3, FINRA RULES 6730(A) AND 6730(C)(8) AS WELL AS NASD RULE 3110.

Initiated By: FINRA
Date Initiated: 12/16/2011
Docket/Case Number: [2010024504301](#)
Principal Product Type: Debt - Corporate
Other Product Type(s):
Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:
Resolution: Acceptance, Waiver & Consent(AWC)
Resolution Date: 12/16/2011
Sanctions Ordered: Censure
 Monetary/Fine \$12,500.00
Other Sanctions Ordered:
Sanction Details: \$12,500 FINE WAS PAID ON 1/4/12

Disclosure 5 of 9

Reporting Source: Regulator
Current Status: Final
Allegations: NASD RULES 6230(A), 6230(C)(13) - SOURCE CAPITAL GROUP, INC. FAILED TO REPORT TO TRACE TRANSACTIONS IN TRACE-ELIGIBLE SECURITIES EXECUTED ON A BUSINESS DAY DURING TRACE SYSTEM HOURS WITHIN 15 MINUTES OF THE TIME OF EXECUTION. THE FIRM FAILED TO REPORT TO TRACE THE LOWER OF YIELD TO CALL OR YIELD TO MATURITY FOR TRANSACTIONS IN TRACE-ELIGIBLE SECURITIES.
Initiated By: FINRA
Date Initiated: 06/26/2008
Docket/Case Number: 20070077952-01
Principal Product Type: Other
Other Product Type(s): TRACE-ELIGIBLE SECURITIES



Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 06/26/2008

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: Censure
Monetary/Fine \$7,500.00

Other Sanctions Ordered:

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

Reporting Source: Firm

Current Status: Final

Allegations: FAILURE TO REPORT BOND TRANSACTIONS TO TRACE IN A TIMELY MANNER.

Initiated By: FINRA

Date Initiated: 06/06/2008

Docket/Case Number: 20070077952-01

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought: FINE

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 06/26/2008



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

Other Sanctions Ordered:

Sanction Details: CENSURE AND FINE (\$7500)

Disclosure 6 of 9

Reporting Source: Regulator

Current Status: Final

Allegations: THE 4/28/08 CONSENT ORDER ALLEGED THAT 1) ON AUGUST 29, 2006, AS A PRECONDITION TO REGISTERING DONATAS BELYS VILDZIUS (CRD NUMBER 2202883) AS AN AGENT OF THE FIRM, THE COMMISSIONER ENTERED A CONSENT ORDER CONDITIONING REGISTRATION AS AN AGENT (NO. CO-06-7298-S); 2) THE AUGUST 29, 2006 CONSENT ORDER, TO WHICH THE FIRM WAS A SIGNATORY, OBLIGATED SOURCE CAPITAL GROUP, INC. TO FILE QUARTERLY REPORTS WITH THE DEPARTMENT FOR TWO YEARS CONCERNING ANY COMPLAINTS, ACTIONS OR PROCEEDINGS INVOLVING VILDZIUS; AND 3) SOURCE CAPITAL GROUP, INC. VIOLATED THE AUGUST 29, 2006 CONSENT ORDER BY FAILING TO ABIDE BY THE QUARTERLY REPORTING REQUIREMENT.

Initiated By: CONNECTICUT

Date Initiated: 04/28/2008

Docket/Case Number: CO-2008-7499-S

URL for Regulatory Action:

Principal Product Type: No Product

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: 04/28/2008



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 \$2,500.00 Cease and Desist/Injunction
Other Sanctions Ordered:	THE APRIL 28, 2008 CONSENT ORDER DIRECTED SOURCE CAPITAL GROUP, INC. TO CEASE AND DESIST FROM REGULATORY VIOLATIONS AND TO PAY \$4,000 TO THE AGENCY. OF THAT AMOUNT, \$2,500 CONSTITUTED AN ADMINISTRATIVE FINE AND \$1,500 WOULD BE APPLIED TO DEFRAY THE DIVISION'S INVESTIGATIVE COSTS. IN ADDITION, THE CONSENT ORDER REINSTITUTED FOR A TWO YEAR PERIOD THE QUARTERLY COMPLAINT REPORTING REQUIREMENT CONCERNING VILDZIUS. THE CONSENT ORDER ALSO DIRECTED SOURCE CAPITAL GROUP, INC. TO HIRE A CONSULTANT TO REVIEW THE FIRM'S SUPERVISORY AND COMPLIANCE PROCEDURES.
Sanction Details:	SEE RESPONSE TO ITEM 13.B.
Regulator Statement	SEE DISPOSITIONAL RESPONSE IN ITEM 13.B.
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Reporting Source:	Firm
Current Status:	Final
Allegations:	FAILURE TO COMPLY WITH CONSENT ORDER
Initiated By:	STATE OF CONNECTICUT
Date Initiated:	04/28/2008
Docket/Case Number:	CO-2008-7499-S
Principal Product Type:	No Product
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:	04/28/2008



Sanctions Ordered:	Monetary/Fine \$2,500.00 Cease and Desist/Injunction
Other Sanctions Ordered:	COST OF INVESTIGATION \$1500.00
Sanction Details:	FINE \$2500.00
Firm Statement	THE COMPANY FAILED TO REPORT THAT A REPRESENTATIVE DID NOT HAVE ANY CUSTOMER COMPLAINTS. **FINRA REPORTED THAT THE FIRM WOULD BE DEFICIENT UNLESS IT CHECKED OFF BOX 11D(4). THE FIRM DOES NOT BELIEVE THE ORDER IS REPORTABLE UNDER 11D(4)!

Disclosure 7 of 9

Reporting Source:	Regulator
Current Status:	Final
Allegations:	SEC RULE 17A-3, NASD RULES 3110, 6230(A) - SOURCE CAPITAL GROUP, INC. FAILED TO REPORT TO TRACE TRANSACTIONS IN TRACE-ELIGIBLE SECURITIES EXECUTED ON A BUSINESS DAY DURING TRACE SYSTEM HOURS WITHIN 15 MINUTES OF THE TIME OF EXECUTION; AND FAILED TO SHOW THE CORRECT TIME OF EXECUTION ON BROKERAGE ORDER MEMORANDA.
Initiated By:	FINRA
Date Initiated:	01/16/2008
Docket/Case Number:	20060058480-01
Principal Product Type:	Other
Other Product Type(s):	TRACE-ELIGIBLE SECURITIES
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	01/16/2008
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: Censure
Monetary/Fine \$7,500.00

Other Sanctions Ordered:

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

Reporting Source: Firm

Current Status: Final

Allegations:

1. DURING THE REVIEW PERIOD , THE FIRM FAILED TO REPORT 22 TRANSACTIONS TO TRACE WITHIN 15 MINUTES OF EXECUTION.
2. DURING THE REVIEW PERIOD, THE FIRM FAILED TO SHOW THE CORRECT TIME OF EXECUTION OF 13 BROKERAGE ORDERS.

Initiated By: FINRA

Date Initiated: 12/14/2007

Docket/Case Number: 20060058480-01

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought: FINE

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 01/16/2008

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

Other Sanctions Ordered:

Sanction Details: CENSURE AND FINE OF \$7500(\$5000 FOR THE TRACE REPORTING VIOLATIONS AND \$2500 FOR THE RECORDKEEPING VIOLATIONS.

Disclosure 8 of 9

Reporting Source: Regulator

Current Status: Final



Allegations: NASD RULES 2711(C)(2)(A), 2711(H)(1)(A), 2711(I) AND 2110:
 PRIOR TO THE ISSUANCE OF RESEARCH REPORT, THE FIRM, ACTING THROUGH AN INDIVIDUAL, SENT DRAFTS OF THAT REPORT TO THE FIRM THAT INCLUDED THE RESEARCH SUMMARY, RESEARCH RATING AND PRICE TARGET; THE FIRM, ACTING THROUGH AN INDIVIDUAL ISSUED A RESEARCH REPORT ON A COMPANY THAT FAILED TO DISCLOSE THAT AN INDIVIDUAL ACQUIRED 15,000 SHARES OF THE ITS STOCK. SOURCE, ACTING THROUGH AN INDIVIDUAL, FAILED TO IMPLEMENT THE FIRM'S WRITTEN SUPERVISORY PROCEDURES TO ENSURE THAT THE FIRM AND ITS EMPLOYEES COMPLIED WITH THE PROVISIONS OF NASD RULE 2711.

Initiated By: NASD

Date Initiated: 06/18/2007

Docket/Case Number: [2006003803601](#)

Principal Product Type: Other

Other Product Type(s): STOCK

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 06/18/2007

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: Censure
 Monetary/Fine \$20,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, RESPONDENT MEMBER FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, FIRM IS CENSURED AND FINED \$20,000 JOINTLY AND SEVERALLY.

Reporting Source: Firm



Current Status: Final

Allegations: RESEARCH ANALYST SENT ENTIRE PROPOSED RESEARCH REPORT TO COMPANY PRIOR TO PUBLICATION WITHOUT REMOVING THE RECOMMENDATION. ANALYST ISSUED REPORT ON ANOTHER COMPANY BUT FAILED TO DISCLOSE THAT HE OWNED 15,000 SHARES OF THE COMPANY'S STOCK.

Initiated By: NASD

Date Initiated: 06/18/2007

Docket/Case Number: [2006003803601](#)

Principal Product Type: Other

Other Product Type(s): STOCK

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

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 06/18/2007

Sanctions Ordered: Censure
Monetary/Fine \$20,000.00

Other Sanctions Ordered:

Sanction Details: FIRM CENSURED AND FINED \$20000.00 JOINTLY AND SEVERALLY. WITHOUT ADMITTING OR DENYING THE FINDINGS THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS.

Disclosure 9 of 9

Reporting Source: Regulator

Current Status: Final

Allegations: NASD CONDUCT RULES 2110 AND 3010(B), NASD MARKETPLACE RULES 4632, 6130, 6230 AND 6620, AND NASD MEMBERSHIP AND REGISTRATION RULE 1032(F) - RESPONDENT MEMBER EFFECTED SECURITIES TRANSACTIONS INVOLVING NASDAQ NATIONAL MARKET SECURITIES, WHILE FAILING TO TIMELY AND CCURATELY REPORT THE TRANSACTIONS IN THAT: TRADES WERE REPORTED AS PRINCIPAL TRADES WHEN THEY WERE EXECUTED AS AGENCY TRADES; TRADES WERE REPORTED AS AGENCY TRADES WHEN THEY WERE EXECUTED AS PRINCIPAL TRADES;



TRADE WAS REPORTED AS A PRINCIPAL TRADE WHEN IT WAS EXECUTED AS RISKLESS PRINCIPAL TRADE; TRADE WAS REPORTED LATE WITH .SLD MODIFIER; TRADE WAS REPORTED LATE WITHOUT THE .SLD MODIFIER; AND, TRADES WERE BUNCHED TRADES, BUT NOT REPORTED AS BUNCHED TRADES. THE FIRM ALSO EFFECTED SECURITIES TRANSACTIONS INVOLVING OVER-THE-COUNTER EQUITY SECURITIES, WHILE FAILING TO TIMELY AND ACCURATELY REPORT THE TRANSACTIONS IN THAT: TRADES WERE RPORTED AS AGENCY TRADES WHEN THEY WERE EXECUTED AS PRINCIPAL TRADES; TRADES WERE REPORTED LATE WITHOUT THE .SLD MODIFIER; AND, TRADE WAS REPORTED AS AN AGENCY TRADE WHEN 5000 SHARES OF THE TRADE SHOULD HAVE BEEN REPORTED AS A SEPREATE TRANSACTION AS PRINCIPAL TRADE. IN ADDITION, THE FIRM EFFECTED SECURITIES TRANSACTIONS INVOLVING CONSOLIDATED QUOTATION SERVICE SECURITIES, WHILE FAILING TO TIMELY AND CCURATELY REPORT THE TRANSACTIONS IN THAT: TRADE WAS REPORTED AS PRINCIPAL TRADE WHEN IT WAS EXECUTED AS AGENCY TRADE. FURTHERMORE, THE FIRM EFFECTED DEBT SECURITIES THAT ARE REPORTABLE UNDER THE TRADE REPORTING AND COMPLIANCE ENGINE ("TRACE"), WHILE FAILING TO TIMELY AND ACCURATELY REPORT THE TRANSACTIONS IN THAT: TRADES WERE REPORTED AS AGENCY TRADES WHEN THEY WERE EXECUTED AS PRINCIPAL TRADES; TRADES WERE REPORTED AT A PRICE WHICH EXECUTED THE MARKUP OR MARKDOWN; TRADES WERE REPORTED WITHOUT DISCLOSING THE LOWER OF THE YIELD TO CALL OR YIELD TO MATURITY; TRADES WERE REPORTED LATE WITH A .SLD MODIFIER; AND, ONE TRADE WAS REPORTED TWICE. THE FIRM FAILED TO ESTABLISH AND MAINTAIN

Initiated By: NASD
Date Initiated: 11/11/2003
Docket/Case Number: C8A030084
Principal Product Type: Other
Other Product Type(s): UNKNOWN TYPE OF SECURITIES
Principal Sanction(s)/Relief Sought:
Other Sanction(s)/Relief Sought:
Resolution: Acceptance, Waiver & Consent(AWC)
Resolution Date: 11/11/2003



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: Censure
Monetary/Fine \$9,500.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RESPONDENT FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, FIRM IS CENSURED AND FINED \$7,000. IN ADDITION, THE FIRM FINED \$2,500, JOINTLY AND SEVERALLY.

Regulator Statement WRITTEN SUPERVISORY PROCEDURES TO SUPERVISE THE TRADE REPORTING REQUIREMENTS OF THE FIRM, WHICH WERE ADEQUATELY DESIGNED TO ACHIEVE COMPLIANCE WITH THE APPLICABLE NASD RULES. THE FIRM, ACTING THROUGH AN INDIVIDUAL, PERMITTED THAT INDIVIDUAL TO SUPERVISE A REPRESENTATIVE WITH THE FIRM WHO WAS ENGAGED IN PROPRIETARY TRADING ACTIVITY OF FIRM, WHEN THE INDIVIDUAL FAILED TO QUALIFY BY EXAMINATION AND BECOME REGISTERED AS A LIMITED REPRESENTATIVE - EQUITY TRADER.

Reporting Source: Firm

Current Status: Final

Allegations: FAILING TO REPORT TRACE TRADES ACCURATELY.

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS

Date Initiated: 10/07/2003

Docket/Case Number: C8A030084

Principal Product Type: Debt - Corporate

Other Product Type(s):

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

Other Sanction(s)/Relief Sought: CENSURE

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 11/11/2003



Sanctions Ordered: Censure
Monetary/Fine \$7,000.00

Other Sanctions Ordered: \$2500.00 FINE JOINT AND SEVERAL WITH ASSOCIATED PERSON FOR FAILURE TO TAKE EXAM ON A TIMELY MANNER.

Sanction Details: FINE OF \$7000, PAID 11/19/03.
FINE OF \$2500, JOINT AND SEVERAL PAID 11/19/03.
THE FIRM WAS ALSO CENSURED.

Firm Statement THE TRACE SYSTEM WAS INITIATED ON JULY 1, 2003. THE NASD TOLD ALL ITS MEMBERS THAT IT WOULD WORK WITH THEM WITH REGARD TO ANY TRACE PROBLEMS. THE NASD CAME INTO THE FIRM IN THE FIRST WEEK OF SEPTEMBER AND CITED THE COMPANY FOR PROBLEMS THAT OCCURED IN JULY AND AUGUST. THE NASD REFUSED TO WORK WITH THE COMPANY TO CORRECT THE PROBLEMS AND MOVED DIRECTLY TO FINE THEM.



Arbitration Award - Award / Judgment

Brokerage firms are not required to report arbitration claims filed against them by customers; however, BrokerCheck provides summary information regarding FINRA arbitration awards involving securities and commodities disputes between public customers and registered securities firms in this section of the report.

The full text of arbitration awards issued by FINRA is available at www.finra.org/awardsonline.

Disclosure 1 of 3

Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-OTHER; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE; ACCOUNT RELATED-OTHER; DO NOT USE-OTHER-OTHER
Arbitration Forum:	FINRA
Case Initiated:	02/19/2016
Case Number:	16-00147
Disputed Product Type:	OTHER TYPES OF SECURITIES
Sum of All Relief Requested:	\$810,000.00
Disposition:	AWARD AGAINST PARTY
Disposition Date:	02/01/2017
Sum of All Relief Awarded:	\$1,104,630.42

There may be a non-monetary award associated with this arbitration.
Please select the Case Number above to view more detailed information.

Disclosure 2 of 3

Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OTHER; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE; ACCOUNT RELATED-OTHER; DO NOT USE-OTHER-OTHER
Arbitration Forum:	FINRA



Case Initiated: 03/14/2016
Case Number: [16-00590](#)
Disputed Product Type: OTHER TYPES OF SECURITIES
Sum of All Relief Requested: \$545,000.01
Disposition: AWARD AGAINST PARTY
Disposition Date: 04/19/2017
Sum of All Relief Awarded: \$504,946.07

There may be a non-monetary award associated with this arbitration.
Please select the Case Number above to view more detailed information.

Disclosure 3 of 3

Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: ACCOUNT ACTIVITY-FRAUD; ACCOUNT ACTIVITY-MISREPRESENTATION;
 ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-OTHER;
 ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT ACTIVITY-VIOLATE OF BLUE
 SKY LWS; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT
 RELATED-NEGLIGENCE
Arbitration Forum: FINRA
Case Initiated: 10/13/2016
Case Number: [16-02974](#)
Disputed Product Type: OTHER TYPES OF SECURITIES; PRIVATE EQUITIES
Sum of All Relief Requested: \$300,000.01
Disposition: AWARD AGAINST PARTY
Disposition Date: 03/29/2018
Sum of All Relief Awarded: \$300,000.00

There may be a non-monetary award associated with this arbitration.
Please select the Case Number above to view more detailed information.

End of Report



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