BrokerCheck Report

COMSTOCK PARTNERS, L.L.C.

CRD# 37544

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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

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.

COMSTOCK PARTNERS, L.L.C.

CRD# 37544

SEC# 8-47802

Main Office Location

5003 RUBIO AVENUE
LOS ANGELES, CA 91436-1122
Regulated by FINRA Los Angeles Office

Mailing Address

5003 RUBIO AVENUE
LOS ANGELES, CA 91436-1122

Business Telephone Number

310-486-6550

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 limited liability company.

This firm was formed in Nevada on 05/15/1998.

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 firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 1 U.S. state or territory

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

This firm conducts 2 types of businesses.

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

This firm does not have 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	1

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Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Nevada on 05/15/1998.

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.

COMSTOCK PARTNERS, L.L.C.

Doing business as COMSTOCK PARTNERS, L.L.C.

CRD# 37544

SEC# 8-47802

Main Office Location

5003 RUBIO AVENUE
LOS ANGELES, CA 91436-1122

Regulated by FINRA Los Angeles Office

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Business Telephone Number

310-486-6550

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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):	BALASH, JEFFREY LINKE 1404297
Is this a domestic or foreign entity or an individual?	Individual
Position	TRUSTEE, CCO
Position Start Date	02/1992
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

Legal Name & CRD# (if any):	BELVEDERE PARTNERS, INC.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	CHAIRMAN
Position Start Date	06/1998
Percentage of Ownership	10% but less than 25%
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

Legal Name & CRD# (if any):	BALASH, JEFFREY LINKE
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	BELVEDERE PARTNERS INC.
Relationship to Direct Owner	CHAIRMAN
Relationship Established	06/1998
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

Legal Name & CRD# (if any):	BALASH, JEFFREY LINKE
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	JEFFREY L. BALASH REVOCABLE TRUST
Relationship to Direct Owner	TRUSTEE
Relationship Established	02/1992
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

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Firm History

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

No information reported.

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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 1 U.S state or territory.

Federal Regulator	Status	Date Effective
SEC	Approved	06/21/1996

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: No

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	06/21/1996

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Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
California	Approved	11/03/2000

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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 2 types of businesses.

Types of Business

Private placements of securities
Other - 10Y MERGER AND ACQUISITION ADVISORY SERVICES.

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:

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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.

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Firm Operations

Industry Arrangements

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

Name:	SEDACCA ACCOUNTANCY CORP. / JEFF SEDACCA
Business Address:	11661 SAN VICENTE BLVD. #609 LOS ANGELES, CA 90049
Effective Date:	11/01/2011
Description:	MAINTAIN BOOKS & RECORDS FOR COMSTOCK PARTNERS, L.L.C.

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.

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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**

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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	1	0

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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 1

Reporting Source:	Regulator
Current Status:	Final

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Allegations:	FAILURE TO TIMELY FILE ALL OR PART OF FORM BD-Y2K
Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	10/20/1998
Docket/Case Number:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	02/10/1999
Sanctions Ordered:	Censure Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	$5,000 CIVIL PENALTY.
Regulator Statement	[TOP] 10/21/98JW SEC NEWS DIGEST ISSUE 98-202 DATED 10/20/98 ENFORCEMENT PROCEEDINGS DISCLOSED; ON OCTOBER 20, THE SEC INSTITUTED PUBLIC ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS AGAINST 18 BROKERAGE FIRMS FOR FAILING TO TIMELY FILE ALL OR PART OF FORM BD-Y2K. THE SEC'S ORDER ALLEGES THAT AS OF 10/2/98 EIGHT FIRMS INCLUDING COMSTOCK PARTNERS, L.L.C (COMSTOCK) THAT WERE REQUIRED TO FILE PART I OF FORM BD-Y2K HAD FAILED TO DO SO. THESE ACTIONS ARE PART OF A JOINT EFFORT WITH THE NASD AND THE NYSE TO ENSURE THAT FIRMS COMPLY WITH THEIR YEAR 2000 DISCLOSURE OBLIGATIONS. (REL. 34-40574; FILE NO. 3-9759) *** 03/16/99 SEC NEWS DIGEST, ISSUE NO. 99-28, DATED 2/11/99, ENFORCEMENT PROCEEDINGS DISCLOSES; ON FEBRUARY 10, THE SEC ISSUED AN ORDER MAKING FINDINGS, IMPOSING REMEDIAL SANCTIONS AND ORDERING RESPONDENTS TO CEASE AND DESIST PURSUANT TO SECTIONS 15(B) AND 21C OF THE SECURITIES EXCHANGE ACT OF 1934 (EXCHANGE ACT) AGAINST COMSTOCK, BY CONSENT, FOR FAILING TO TIMELY FILE THEIR FORMS BD-Y2K. THE FORM IS DESIGNED TO PROVIDE THE SEC AND THE PUBLIC WITH IMPORTANT INFORMATION CONCERNING THE FIRM'S EFFORTS TO ENSURE THAT ITS COMPUTER SYSTEMS ARE PREPARED FOR THE YEAR 2000. THE ORDER CONTAINS FINDINGS THAT COMSTOCK, A FIRM WITH A MINIMUM NET CAPITAL REQUIREMENT OF $5000, WAS REQUIRED AND FAILED TO FILE PART I OF FORM BD-Y2K BY

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8/31/98. THE ORDER CENSURED COMSTOCK, GELBER AND BETTINGER AND ORDERED THEM TO CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS OR FUTURE VIOLATIONS OF THE BD-Y2K REQUIREMENTS OF THE EXCHANGE ACT. COMSTOCK WAS ALSO ORDERED TO PAY A $5000 CIVIL PENALTY. THE RESPONDENTS CONSENTED TO THE ORDER WITHOUT ADMITTING OR DENYING THE FINDINGS CONTAINED IN THE ORDER. (REL. 34-41040; FILE NO. 3-9759)

Reporting Source:	Firm
Current Status:	Final
Allegations:	FAILURE TO FILE PART I OF FORM BD-Y2K BY OCTOBER 2, 1998
Initiated By:	KATHRYN A. PYUSZKA SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	10/20/1998
Docket/Case Number:	3-9759
Principal Product Type:	No Product
Other Product Type(s):	COMSTOCK PARTNERS LLC IS A ONE PERSON FIRM WHICH PROVIDES FINANCIAL ADVISORY SERVICES TO CORPORATE CLIENTS. IT NEITHER CONDUCTS NOR DIRECTS TRADING IN SECURITIES FOR ANY CLIENT.
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	02/10/1999
Sanctions Ordered:	Censure Monetary/Fine $5,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	NONE
Sanction Details:	$5000 FINE WHICH WAS PAID WITHIN TEN BUSINESS DAYS AFTER FEBRUARY 10,1999.

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End of Report

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