

## BrokerCheck Report

### J. ALDEN ASSOCIATES, INC.

CRD# 40002

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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).



## J. ALDEN ASSOCIATES, INC.

CRD# 40002

SEC# 8-48938

### Main Office Location

37 WEST AVE  
SUITE 301  
WAYNE, PA 19087  
Regulated by FINRA Philadelphia Office

### Mailing Address

37 WEST AVE  
SUITE 300  
WAYNE, PA 19087

### Business Telephone Number

215-572-8700

## 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 10/30/1995.

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
- 53 U.S. states and territories

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

This firm conducts 13 types of businesses.

This firm is affiliated with financial or investment institutions.

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

### Disclosure Events

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

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

**The following types of disclosures have been reported:**

Type	Count
Regulatory Event	2
Civil Event	1



Firm Profile

This firm is classified as a corporation.

This firm was formed in Delaware on 10/30/1995.

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.

J. ALDEN ASSOCIATES, INC.

Doing business as J. ALDEN ASSOCIATES, INC.

CRD# 40002

SEC# 8-48938

Main Office Location

37 WEST AVE  
SUITE 301  
WAYNE, PA 19087

Regulated by FINRA Philadelphia Office

Mailing Address

37 WEST AVE  
SUITE 300  
WAYNE, PA 19087

Business Telephone Number

215-572-8700

Other Names of this Firm

Name	Where is it used
ADI-DASSLER INTERNATIONAL OFFICE	FL
ALDEN INVESTMENT GROUP	AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IA, IL, IN, KS, MA, MD, ME, MI, MO, MS, NC, NJ, NY, PA, SD, TN, TX, VA, WA, WI
AMBASSADOR FINANCIAL GROUP, LLC	AK, AL, AR, AZ, CA,

	CO, CT, DC, DE, FL, GA, HI, IA, ID, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, PR, RI, SC, SD, TN, TX, UT, VA, VI, VT, WA, WI, WV, WY
ATHENA	PA
KINGS MANAGMENT	DE, MD, NJ, NV, PA
MADISON SIXTY, LLC	NJ, NY, PA
MONUMENTAL INVESTMENTS	WV
NEMES RUSH	MI
NEWCLEUS	PA
PINE VALLEY INVESTMENTS	NJ
PURSUE WEALTH PARTMERS, LLC	CA
SHARP FINANCIAL	PA
STRATEGIC WEALTH MANAGEMENT	CA, CO, DE, MA, NV, OH, PA, VA
THE GALBREATH GROUP	AL, CT, DE, FL, MA, MD, MO, NC, NJ, NY, OH, VA, WI, WV



## 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):** CALFO, LEE ALBERT  
4782334

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

**Position** CEO, PRINCIPAL, RESEARCH PRINCIPAL

**Position Start Date** 02/2019

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

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

**Is this a public reporting company?**

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**Legal Name & CRD# (if any):** CASTLE CREEK LAUNCHPAD FUND I, LP

**Is this a domestic or foreign entity or an individual?** Domestic Entity

**Position** SHAREHOLDER

**Position Start Date** 09/2023

**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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**Legal Name & CRD# (if any):** SMITH, KENNETH RICHARD  
2300203

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

**Position** PRINCIPAL, CHIEF COMPLIANCE OFFICER, MUNICIPAL SECURITIES  
PRINCIPAL, AMLCO

**Position Start Date** 02/2019

## Firm Profile



### Direct Owners and Executive Officers (continued)

**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):** ENGELBACH, PETER ALDEN  
201177

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

**Position** PRESIDENT, PRINCIPAL, OPTIONS PRINCIPAL

**Position Start Date** 05/1996

**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):** KINZER, CAROL ANN  
4519471

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

**Position** FINOP

**Position Start Date** 10/2022

**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 currently registered with the SEC, 1 SRO and 53 U.S. states and territories.**

Federal Regulator	Status	Date Effective
SEC	Approved	05/22/1996

### SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

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

A government securities broker or dealer only: No

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

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	05/22/1996



## Firm Operations

### Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	09/30/2008
Alaska	Approved	06/03/2022
Arizona	Approved	04/05/2016
Arkansas	Approved	12/06/2012
California	Approved	07/25/1996
Colorado	Approved	04/24/2013
Connecticut	Approved	05/20/2002
Delaware	Approved	08/26/1996
District of Columbia	Approved	06/17/2013
Florida	Approved	08/08/1996
Georgia	Approved	05/03/2005
Hawaii	Approved	04/11/2022
Idaho	Approved	01/18/2022
Illinois	Approved	03/26/2008
Indiana	Approved	04/11/2008
Iowa	Approved	03/24/2008
Kansas	Approved	04/07/2008
Kentucky	Approved	09/17/2020
Louisiana	Approved	02/11/2021
Maine	Approved	04/07/2008
Maryland	Approved	06/23/1997
Massachusetts	Approved	07/23/1996
Michigan	Approved	03/18/2008
Minnesota	Approved	07/27/2022
Mississippi	Approved	01/22/2016
Missouri	Approved	03/27/2008
Montana	Approved	06/15/2021
Nebraska	Approved	07/07/2022
Nevada	Approved	10/22/2019
New Hampshire	Approved	08/28/2019
New Jersey	Approved	07/18/1996
New Mexico	Approved	04/19/2022
New York	Approved	08/13/1996

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	04/22/2005
North Dakota	Approved	03/04/2022
Ohio	Approved	02/12/2001
Oklahoma	Approved	10/12/2020
Oregon	Approved	07/30/2019
Pennsylvania	Approved	04/10/1996
Puerto Rico	Approved	11/12/2021
Rhode Island	Approved	07/11/2022
South Carolina	Approved	04/17/2019
South Dakota	Approved	10/22/2014
Tennessee	Approved	08/05/2008
Texas	Approved	10/12/2006
Utah	Approved	07/15/2019
Vermont	Approved	05/13/2021
Virgin Islands	Approved	08/09/2022
Virginia	Approved	01/22/2007
Washington	Approved	03/11/2008
West Virginia	Approved	05/09/2022
Wisconsin	Approved	03/24/2008
Wyoming	Approved	07/14/2020



## 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 13 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)
Mutual fund retailer
U S. government securities broker
Municipal securities broker
Broker or dealer selling variable life insurance or annuities
Solicitor of time deposits in a financial institution
Put and call broker or dealer or option writer
Broker or dealer selling tax shelters or limited partnerships in primary distributions
Non-exchange member arranging for transactions in listed securities by exchange member
Private placements of securities
Other - J ALDEN ASSOCIATES HAS ALSO RECEIVED FINRA APPROVAL TO CONDUCT THE FOLLOWING TYPES OF BUSINESS: RESEARCH, NON-TRADED REITS, MERGERS AND ACQUISITIONS ADVISORY SERVICES (INCLUDING FAIRNESS OPINIONS), BEST EFFORTS UNDERWRITER, WHOLESALING OF STRUCTURED PRODUCTS THAT INCLUDES TIME DEPOSITS (CDS) AS THE UNDERLYING SECURITY, WHOLESALER OF MUTUAL FUNDS AND ETFs, ACTING AS A PLACEMENT AGENT AND THIRD-PARTY MARKETER FOR HEDGE FUNDS, AND MAINTAINING COMMISSION SHARING AGREEMENTS WITH OTHER BROKER/DEALERS.

#### Other Types of Business

This firm does not effect transactions in commodities, commodity futures, or commodity options.  
This firm does not engage in other non-securities business.

Non-Securities Business Description:



## Firm Operations

### Clearing Arrangements

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

### Introducing Arrangements

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

<b>Name:</b>	AXOS CLEARING LLC
<b>CRD #:</b>	117176
<b>Business Address:</b>	15950 WEST DODGE RD STE 300 OMAHA, NE 68118
<b>Effective Date:</b>	07/01/2025
<b>Description:</b>	WE HAVE A FULLY DISCLOSED CLEARING AGREEMENT WITH AXOS CLEARING LLC

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<b>Name:</b>	RAYMOND JAMES & ASSOCIATES, INC.
<b>CRD #:</b>	705
<b>Business Address:</b>	880 CARILLON PKWY ST PETERSBURG, FL 33716
<b>Effective Date:</b>	10/05/2011
<b>Description:</b>	WE HAVE A FULLY DISCLOSED AGREEMENT WITH RAYMOND JAMES & ASSOCIATES, INC.

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## Firm Operations

### Industry Arrangements

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

**Name:** AXOS CLEARING LLC  
**CRD #:** 117176  
**Business Address:** 15950 WEST DODGE RD STE 300  
OMAHA, NE 68118  
**Effective Date:** 07/01/2025  
**Description:** WE HAVE A FULLY DISCLOSED CLEARING AGREEMENT WITH AXOS  
CLEARING LLC

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**Name:** RAYMOND JAMES & ASSOCIATES, INC.  
**CRD #:** 705  
**Business Address:** 880 CARILLON PKWY  
ST PETERBURG, FL 33716  
**Effective Date:** 10/05/2011  
**Description:** WE HAVE A FULLY DISCLOSED AGREEMENT WITH RAYMOND JAMES &  
ASSOCIATES, INC.

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

**Name:** AXOS CLEARING LLC  
**CRD #:** 117176  
**Business Address:** 15950 WEST DODGE RD STE 300  
OMAHA, NE 68118  
**Effective Date:** 07/01/2025  
**Description:** WE HAVE A FULLY DISCLOSED CLEARING AGREEMENT WITH AXOS  
CLEARING LLC

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**Name:** RAYMOND JAMES & ASSOCIATES, INC.  
**CRD #:** 705  
**Business Address:** 880 CARILLON PKWY  
ST PETERSBURG, FL 33716  
**Effective Date:** 10/05/2011  
**Description:** WE HAVE A FULLY DISCLOSED AGREEMENT WITH RAYMOND JAMES &  
ASSOCIATES INC.

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## Firm Operations



### Industry Arrangements (continued)

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

<b>Name:</b>	RAYMOND JAMES & ASSOCIATES, INC.
<b>CRD #:</b>	705
<b>Business Address:</b>	880 CARILLON PKWY ST PETERSBURG, FL 33716
<b>Effective Date:</b>	10/05/2011
<b>Description:</b>	WE HAVE A FULLY DISCLOSED AGREEMENT WITH RAYMOND JAMES & ASSOCIATES, INC.

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### Control Persons/Financing

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

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



## Firm Operations

### Organization Affiliates

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

**This firm is, 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.**

**ALDEN INVESTMENT GROUP is under common control with the firm.**

<b>CRD #:</b>	317077
<b>Business Address:</b>	37 WEST AVE SUITE 301 WAYNE, PA 19380
<b>Effective Date:</b>	02/11/2022
<b>Foreign Entity:</b>	No
<b>Country:</b>	
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	Yes
<b>Description:</b>	EXECUTIVES OF J ALDEN ASSOCIATES ARE ALSO THE MAJORITY OWNERS AND EXECUTIVES OF ALDEN INVESTMENT ADVISORS, LLC.

**EQUALIZE CAPITAL LLC is under common control with the firm.**

<b>CRD #:</b>	300640
<b>Business Address:</b>	151 C. DE SAN FRANCISCO SAN JUAN, PR 00901
<b>Effective Date:</b>	08/30/2021
<b>Foreign Entity:</b>	No
<b>Country:</b>	
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	Yes
<b>Description:</b>	LEE CALFO AND KENNETH SMITH HAVE AN OWNERSHIP STAKE IN THE



## Firm Operations



### Organization Affiliates (continued)

FIRM. MR. CALFO SERVES AS EQLIZE'S CEO AND KENNETH SMITH SERVES AS IT'S CCO.

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#### COMPASS FINANCIAL ADVISORS, LLC is under common control with the firm.

**CRD #:** 128319

**Business Address:** P.O. BOX 652  
MEDIA, PA 19063

**Effective Date:** 09/04/2018

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** KENNETH SMITH SERVES AS THE CCO FOR COMPASS FINANCIAL ADVISORS AND J ALDEN ASSOCIATES, INC.

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#### ALDEN CAPITAL is under common control with the firm.

**CRD #:** 293551

**Business Address:** 261 OLD YORK ROAD  
SUITE 837  
JENKINTOWN, PA 19046

**Effective Date:** 07/12/2018

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** Yes

**Description:** AN OWNERSHIP CHANGE / CMA IS PRESENTLY PENDING WITH FINRA. ONCE COMPLETE (WITHIN 30 DAYS) THE PRINCIPALS OF ALDEN CAPITAL MANAGEMENT ( KENNETH SMITH AND LEE CALFO ) WILL HOLD A MAJORITY OWNERSHIP OF J ALDEN ASSOCIATES. LEE CALFO WILL BE REGISTERED WITH J ALDEN ASSOCIATES WITHIN THE NEXT WEEK AND WILL BE ASSUMING THE ROLE OF CEO.

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## Firm Operations



### Organization Affiliates (continued)

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

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



Disclosure Events

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

	Pending	Final	On Appeal
Regulatory Event	0	2	0
Civil Event	1	0	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 2

**Reporting Source:** Firm

**Current Status:** Final



**Allegations:** WHEN RENEWING OUR NEW JERSEY INSURANCE LICENSE WE INADVERTENTLY CHECK QUESTION 2 AS A NO ANSWER. WE SHOULD HAVE CHECK THIS AS YES. HOWEVER, WE PROVIDED THEM WITH THE INFORMATION AS THOUGHT WE HAD ANSWERED THE QUESTION YES. THIS CONFLICT WAS PICKED UP BY THE INSURANCE DEPARTMENT.

**Initiated By:** STATE OF NEW JERSEY  
DEPARTMENT OF BANKING AND INSURANCE

**Date Initiated:** 05/10/2013

**Docket/Case Number:** 9837734

**Principal Product Type:** Insurance

**Other Product Type(s):**

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

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

**Resolution:** Consent

**Resolution Date:** 05/21/2013

**Sanctions Ordered:** Monetary/Fine \$1,000.00

**Other Sanctions Ordered:**

**Sanction Details:** FINE PAID 05/10/2013

## Disclosure 2 of 2

**Reporting Source:** Regulator

**Current Status:** Final

**Allegations:** FINRA RULES 2010, 3130, NASD RULES 2110, 3010, 3011(B), 3012, 3013, INTERPRETATIVE MATERIAL 3013, MSRB RULES G-27, G-41: THE FIRM FAILED TO DEVELOP AND ENFORCE WRITTEN PROCEDURES REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH NASD RULE 3010(D)(2) REGARDING THE REVIEW OF ELECTRONIC CORRESPONDENCE. ALTHOUGH THE FIRM HAD CERTAIN RELEVANT PROCEDURES IN PLACE, IT DID NOT HAVE A SATISFACTORY SYSTEM FOR PROVIDING DESIGNATED PRINCIPALS WITH ACCESS TO SUCH CORRESPONDENCE FOR REVIEW. INSTEAD, THE FIRM RELIED ON REGISTERED REPRESENTATIVES TO PRINT AND FORWARD ANY EMAILS INVOLVING CUSTOMERS TO THE FIRM. THE FIRM, HOWEVER, DID NOT HAVE EFFECTIVE PROCEDURES TO MONITOR THE COMPLIANCE OF ITS REPRESENTATIVES WITH THE EMAIL



FORWARDING REQUIREMENT. THE FIRM, ACTING THROUGH AN INDIVIDUAL, ITS PRESIDENT AND CHIEF EXECUTIVE OFFICER (CEO), FAILED TO ESTABLISH, MAINTAIN AND ENFORCE AN ADEQUATE SYSTEM OF SUPERVISORY CONTROL POLICIES AND PROCEDURES THAT (A) TESTED AND VERIFIED THAT ITS SUPERVISORY PROCEDURES WERE REASONABLY DESIGNED WITH RESPECT TO THE ACTIVITIES OF THE FIRM AND ITS REGISTERED REPRESENTATIVES AND ASSOCIATED PERSONS TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS AND REGULATIONS AND (B) CREATED ADDITIONAL OR AMENDED SUPERVISORY PROCEDURES WHERE THE NEED WAS IDENTIFIED BY SUCH TESTING AND VERIFICATION. THE FIRM, ACTING THROUGH THE INDIVIDUAL, FAILED TO PREPARE AN ANNUAL CERTIFICATION FROM ITS CEO (OR EQUIVALENT OFFICER) THAT IT HAD IN PLACE PROCESSES TO ESTABLISH, MAINTAIN, REVIEW, TEST AND MODIFY WRITTEN COMPLIANCE POLICIES AND WRITTEN SUPERVISORY PROCEDURES REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE FINRA RULES, MSRB RULES AND FEDERAL SECURITIES LAWS AND REGULATIONS, AND THAT THE CEO HAD CONDUCTED ONE OR MORE MEETINGS WITH THE FIRM'S CHIEF COMPLIANCE OFFICER IN THE PRECEDING TWELVE MONTHS TO DISCUSS SUCH PROCESSES. THE FIRM, ACTING THROUGH THE INDIVIDUAL, FAILED TO IMPLEMENT ITS CUSTOMER IDENTIFICATION PROGRAM (CIP) IN THAT IT DID NOT VERIFY CUSTOMER IDENTITIES FOR ACCOUNTS OPENED WITH THE FIRM. THE FIRM, ACTING THROUGH THE INDIVIDUAL, ALSO FAILED TO ENSURE COMPLIANCE WITH THE BANK SECRECY ACT BY FAILING TO ENFORCE ITS PROCEDURES REQUIRING THE FIRM TO REVIEW ALL SECTION 314(A) REQUESTS THAT IT RECEIVED FROM THE FINANCIAL CRIMES ENFORCEMENT NETWORK (FINCEN).

<b>Initiated By:</b>	FINRA
<b>Date Initiated:</b>	01/12/2012
<b>Docket/Case Number:</b>	<a href="#">2009016226801</a>
<b>Principal Product Type:</b>	No Product
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Other
<b>Other Sanction(s)/Relief Sought:</b>	N/A
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Resolution Date:</b>	01/12/2012



**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 \$15,000.00

**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 IT IS CENSURED, FINED \$5,000 (\$2,500 OF WHICH PERTAINS TO THE VIOLATIONS OF MSRB RULE G-27), AND FINED, JOINTLY AND SEVERALLY, \$10,000 (\$5,000 OF WHICH PERTAINS TO THE VIOLATIONS OF MSRB RULES G-27 AND G-41). \$5,000 FINE PAID IN FULL ON 11/5/2012.

**Reporting Source:**

Firm

**Current Status:**

Final

**Allegations:**

FINRA REGULATORY ACTION CASE NO. 2009016226801 ACCEPTANCE, WAIVER & CONSENT(AWC) ISSUED ON 01/12/2012. THE FIRMS PROCEDURES REGARDING ELECTRONIC CORRESPONDENCE WAS DEEMED INADEQUATE AND ENGELBACH AS SUPERVISOR FAILED TO ESTABLISH REASONABLY DESIGNED CONTROL POLICIES AND PROCEDURES. IN VIOLATION OF FINRA RULES 2010, 3130, NASD RULES 2110, 3010, 3011(B), 3012, 3013, INTERPRETATIVE MATERIAL 3013, MSRB RULES G-27, G-41: SECONDLY, THE FIRM THE FIRMS PRESIDENT AND CEO FAILED TO IMPLETMENT ADEQUATE PROCEDURES TO COMPLY WITH THE BANK SECRECY ACT.

**Initiated By:**

FINRA REGULATORY ACTION CASE NO. 2009016226801 ACCEPTANCE, WAIVER & CONSENT(AWC) ISSUED ON 01/12/2012.

**Date Initiated:**

09/13/2010

**Docket/Case Number:**

[2009016226801](#)

**Principal Product Type:**

Other

**Other Product Type(s):**

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

Civil and Administrative Penalt(ies) /Fine(s)

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

FINE



<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Resolution Date:</b>	01/13/2012
<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$15,000.00
<b>Other Sanctions Ordered:</b>	THERE WERE NO OTHER SANCTIONS
<b>Sanction Details:</b>	FINRA REGULATORY ACTION CASE NO. 2009016226801 ACCEPTANCE, WAIVER & CONSENT(AWC) ISSUED ON 01/12/2012. JOINTLY AND SEVERALY A FINE 15000.00 25% INSTALLMENT PAYMENT HAS BEEN PAID. \$5000.00 AGAINST J. ALDEN AND \$10,000 AGAINST PETER ENGELBACH
<b>Firm Statement</b>	VIOLATION OF SEVERAL FINRA RULES AND REGULATIONS





## Civil - Pending

This type of disclosure event involves a pending civil court action that with seek an injunction to cease certain investment-related activity or alleges a violation of any investment-related statute or regulation.

### Disclosure 1 of 1

<b>Reporting Source:</b>	Firm
<b>Current Status:</b>	Pending
<b>Allegations:</b>	PLAINTIFFS ALLEGEDLY PURCHASED SHARES OF STOCK IN A PRIVATE COMPANY KNOWN AS LIFE BRAND. THE COMPANIES' EXECUTIVES AND BOARD ARE ALLEGED TO HAVE SQUANDERED COMPANY ASSETS AND BREACHED THEIR FIDUCIARY DUTIES. DEFENDANT FALCO ALLEGEDLY INDUCED AND ENCOURAGED PLAINTIFF'S INVESTMENTS.
<b>Initiated By:</b>	CARL GEORIGI, GARY NITSCHKE LB 6 INVESTORS LLC, BRENT CELEK, STEPHEN MEYER, CRAIG C. SCOTT JR., SJI CAPITAL, AND TODD JAMES, LTD.
<b>Court Details:</b>	IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE, CASE 2024-733-
<b>Date Court Action Filed:</b>	07/11/2024
<b>Date Notice/Process Served:</b>	07/23/2024
<b>Principal Product Type:</b>	Other
<b>Other Product Types:</b>	
<b>Relief Sought:</b>	Money Damages (Private/Civil Complaint)
<b>Other Relief Sought:</b>	
<b>Firm Statement</b>	N/A. MATTER REMAINS PENDING

**End of Report**



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