

## BrokerCheck Report

### IFS SECURITIES

CRD# 40375

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Please be aware that fraudsters may link to BrokerCheck from phishing and similar scam websites, trying to steal your personal information or your money. Make sure you know who you're dealing with when investing, and contact FINRA with any concerns.

For more information read our [investor alert](#) on imposters.

## 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.

• **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).



## IFS SECURITIES

CRD# 40375

SEC# 8-49020

### Main Office Location

3424 PEACHTREE RD NE  
SUITE 2200  
ATLANTA, GA 30326-1184

### Mailing Address

3424 PEACHTREE RD NE  
SUITE 2200  
ATLANTA, GA 30326-1184

### Business Telephone Number

(404) 704-0406

## 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 Pennsylvania on 09/21/1993.

Its fiscal year ends in March.

### 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	3
Arbitration	1
Financial	1



## 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.

<b>Date firm ceased business:</b>	08/09/2019
<b>Does this brokerage firm owe any money or securities to any customer or brokerage firm?</b>	Yes
<b>Number of customers owed funds or securities:</b>	0
<b>Amount of money owed to customer:</b>	\$0.00
<b>Amount of money owed to brokerage firm:</b>	\$24,791,235.00
<b>Market value of securities owed to customer:</b>	\$0.00
<b>Market value of securities owed to brokerage firm:</b>	\$0.00
<b>Payment arrangement:</b>	IFS HAS ESTABLISHED AN ESCROW ACCOUNT THAT, IN THE EVENT IFS BECOMES OBLIGATED TO PAY MONEY TO ANY OR ALL OF THE BROKER-DEALERS, CAN BE USED TO FUND SOME OR ALL OF ANY SUCH PAYMENTS, DEPENDING ON THEIR AMOUNT;



Firm Profile

This firm is classified as a corporation.  
This firm was formed in Pennsylvania on 09/21/1993.  
Its fiscal year ends in March.

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.

**IFS SECURITIES, INC**  
**Doing business as IFS SECURITIES**  
**CRD#** 40375  
**SEC#** 8-49020

**Main Office Location**  
3424 PEACHTREE RD NE  
SUITE 2200  
ATLANTA, GA 30326-1184

**Mailing Address**  
3424 PEACHTREE RD NE  
SUITE 2200  
ATLANTA, GA 30326-1184

**Business Telephone Number**  
(404) 704-0406

Other Names of this Firm

Name	Where is it used
IFS CAPITAL MARKETS	FL, GA, NY, TX
IFS EQUITY	FL, GA, MI, NY, PA, TN, VA
IFS SECURITIES	GA



## Firm Profile

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

### Direct Owners and Executive Officers

<b>Legal Name &amp; CRD# (if any):</b>	IFS GROUP, INC.
<b>Is this a domestic or foreign entity or an individual?</b>	Foreign Entity
<b>Position</b>	FOREIGN ENTITY/DIRECT OWNER
<b>Position Start Date</b>	06/2015
<b>Percentage of Ownership</b>	50% but less than 75%
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	MCKENZIE, ALEXYS ULANDO 2642827
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	CEO/OWNER
<b>Position Start Date</b>	12/2006
<b>Percentage of Ownership</b>	10% but less than 25%
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	SADLER, JOQUINN THOMAS 2817763
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	CHIEF COMPLIANCE OFFICER / CHIEF OPERATIONS OFFICER
<b>Position Start Date</b>	12/2006

Firm Profile



Direct Owners and Executive Officers (continued)

Percentage of Ownership	5% but less than 10%
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Does this owner direct the management or policies of the firm?	Yes
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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):	MCKENZIE, ALEXYS ULANDO
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	IFS GROUP, INC.
Relationship to Direct Owner	OWNER
Relationship Established	04/2014
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	

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## 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 05/23/1996 to 02/14/2020.**



## 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 dealer
Municipal securities broker
Broker or dealer selling variable life insurance or annuities
Put and call broker or dealer or option writer
Broker or dealer selling tax shelters or limited partnerships in primary distributions
Trading securities for own account
Private placements of securities
Other - THE FIRM ENGAGES IN THE PROVIDING MUNICIPAL ADVISORY SERVICES TO ISSUERS AS WELL AS IN MUNICIPAL UNDERWRITINGS.

#### 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.

**Name:** COWEN EXECUTION SERVICES LLC

**CRD #:** 35693

**Business Address:** 1633 BROADWAY  
48TH FLOOR  
NEW YORK, NY 10019

**Effective Date:** 10/22/2014

**Description:** IFS SECURITIES, INC. MAINTAINS AN INTRODUCING RELATIONSHIP WITH THE FIRM, WHICH SERVES AS THE CLEARING AGENT AND CUSTODIAN.

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**Name:** INTL FCSTONE FINANCIAL INC.

**CRD #:** 45993

**Business Address:** 800 SHADES CREEK PARKWAY SUITE 700  
BIRMINGHAM, AL 35209

**Effective Date:** 06/09/2008

**Description:** IFS SECURITIES, INC. MAINTAINS AN INTRODUCING RELATIONSHIP WITH THE FIRM, WHICH SERVES AS THE CLEARING AGENT AND CUSTODIAN.

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**Name:** RAYMOND JAMES & ASSOCIATES, INC.

**CRD #:** 705

**Business Address:** 880 CARILLON PARKWAY  
SAINT PETERSBURG, FL 33733

**Effective Date:** 06/03/2008

**Description:** INTERNATIONAL FINANCIAL SOLUTIONS, INC. MAINTAINS AN INTRODUCING RELATIONSHIP WITH THE FIRM, WHICH SERVES AS THE CLEARING AGENT AND CUSTODIAN.

## Firm Operations

### Industry Arrangements



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

**Name:** COWEN EXECUTION SERVICES LLC  
**CRD #:** 35693  
**Business Address:** 1633 BROADWAY  
48TH FLOOR  
NEW YORK, NY 10019  
**Effective Date:** 10/22/2014  
**Description:** IFS SECURITIES, INC. MAINTAINS AN INTRODUCING RELATIONSHIP WITH THE FIRM, WHICH SERVES AS THE CLEARING AGENT AND CUSTODIAN.

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**Name:** INTL FCSTONE FINANCIAL INC.  
**CRD #:** 45993  
**Business Address:** 800 SHADES CREEK PARKWAY SUITE 700  
BIRMINGHAM, AL 35209  
**Effective Date:** 06/09/2008  
**Description:** IFS SECURITIES, INC. MAINTAINS AN INTRODUCING RELATIONSHIP WITH THE FIRM, WHICH SERVES AS THE CLEARING AGENT AND CUSTODIAN.

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**Name:** RAYMOND JAMES & ASSOCIATES, INC.  
**CRD #:** 705  
**Business Address:** 880 CARILLON PARKWAY  
ST PETERSBURG, FL 33733  
**Effective Date:** 06/03/2008  
**Description:** INTERNATIONAL FINANCIAL SOLUTIONS, INC. MAINTAINS AN INTRODUCING RELATIONSHIP WITH THE FIRM, WHICH SERVES AS THE CLEARING AGENT AND CUSTODIAN.

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

**Name:** COWEN EXECUTION SERVICES LLC  
**CRD #:** 35693  
**Business Address:** 1633 BROADWAY  
48TH FLOOR

# Firm Operations



## Industry Arrangements (continued)

NEW YORK, NY 10019

**Effective Date:**

10/22/2014

**Description:**

IFS SECURITIES, INC. MAINTAINS AN INTRODUCING RELATIONSHIP WITH THE FIRM, WHICH SERVES AS THE CLEARING AGENT AND CUSTODIAN.

**Name:**

RAYMOND JAMES &amp; ASSOCIATES, INC.

**CRD #:**

705

**Business Address:**

880 CARILLON PARKWAY  
ST. PETERSBURG,, FL 33733

**Effective Date:**

06/03/2008

**Description:**

INTERNATIONAL FINANCIAL SOLUTIONS, INC. MAINTAINS AN INTRODUCING RELATIONSHIP WITH THE FIRM, WHICH SERVES AS THE CLEARING AGENT AND CUSTODIAN.

**Name:**

INTL FCSTONE FINANCIAL INC.

**CRD #:**

45993

**Business Address:**

800 SHADES CREEK PARKWAY  
BIRMINGHAM, AL 35209

**Effective Date:**

06/09/2008

**Description:**

IFS SECURITIES, INC. MAINTAINS AN INTRODUCING RELATIONSHIP WITH THE FIRM, WHICH SERVES AS THE CLEARING AGENT AND CUSTODIAN.

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

**Name:**

COWEN EXECUTION SERVICES LLC

**CRD #:**

35693

**Business Address:**

1633 BROADWAY  
48TH FLOOR  
NEW YORK, NY 10019

**Effective Date:**

10/22/2014

**Description:**

IFS SECURITIES, INC. MAINTAINS AN INTRODUCING RELATIONSHIP WITH THE FIRM, WHICH SERVES AS THE CLEARING AGENT AND CUSTODIAN.

**Name:**

INTL FCSTONE FINANCIAL INC.

**CRD #:**

45993

## Firm Operations



### Industry Arrangements (continued)

<b>Business Address:</b>	800 SHADES CREEK PARKWAY BIRMINGHAM, AL 35209
<b>Effective Date:</b>	06/09/2008
<b>Description:</b>	IFS SECURITIES, INC. MAINTAINS AN INTRODUCING RELATIONSHIP WITH THE FIRM, WHICH SERVES AS THE CLEARING AGENT AND CUSTODIAN.
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<b>Name:</b>	RAYMOND JAMES & ASSOCIATES, INC.
<b>CRD #:</b>	705
<b>Business Address:</b>	880 CARILLON PARKWAY ST. PETERSBURG, FL 33733
<b>Effective Date:</b>	06/03/2008
<b>Description:</b>	INTERNATIONAL FINANCIAL SOLUTIONS, INC. MAINTAINS AN INTRODUCING RELATIONSHIP WITH THE FIRM, WHICH SERVES AS THE CLEARING AGENT AND CUSTODIAN.

### 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.

**SAN BLAS SECURITIES LLC is under common control with the firm.**

<b>CRD #:</b>	290605
<b>Business Address:</b>	3414 PEACHTREE ROAD NE STE 1020 ATLANTA, GA 30326
<b>Effective Date:</b>	06/21/2018
<b>Foreign Entity:</b>	No
<b>Country:</b>	
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	IFS SECURITIES, INC.,AND SAN BLAS SECURITIES, LLC., HAVE COMMON OWNERSHIP AND CONTROL VIA IFS GROUP

**SVC ASSET MANAGEMENT LLC,INVESTMENT is under common control with the firm.**

<b>Business Address:</b>	100 CHRISTOPHER COLUMBUS DR STE 1008 JERSEY CITY, NJ 07302
<b>Effective Date:</b>	12/02/2011
<b>Foreign Entity:</b>	No
<b>Country:</b>	
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	PRAKASH GUPTA HAS OWNERSHIP IN BOTH IFS GROUP, THE PARENT COMPANY OF IFS SECURITIES, AND IS ALSO AN OWNER OF SVC ASSET



## Firm Operations



### Organization Affiliates (continued)

MANAGEMENT LLC, INVESTMENT

#### SG TRADING & SERVICES, INVESTMENT is under common control with the firm.

**Business Address:** 100 CHRISTOPHER COLUMBUS DR  
STE 1008  
JERSEY CITY, NJ 07302

**Effective Date:** 12/12/2012

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** No

**Description:** PRAKASH GUPTA HAS OWNERSHIP IN BOTH IFS GROUP, THE PARENT COMPANY OF IFS SECURITIES, AND IS ALSO AN OWNER OF SG TRADING & SERVICES, INVESTMENT

#### IBIS COMPLIANCE & FINANCIAL SERVICES, LLC. is under common control with the firm.

**Business Address:** 619 WATERFORD LANE  
MCDONOUGH, GA 30253

**Effective Date:** 10/11/2011

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** Yes

**Description:** JOQUINN SADLER HAS OWNERSHIP IN BOTH IFS GROUP, THE PARENT COMPANY OF IFS SECURITIES, AND IS ALSO AN OWNER OF IBIS COMPLIANCE & FINANCIAL SERVICES, LLC.

#### K2015091240 SOUTH AFRICA (PTY)LTD is under common control with the firm.

**Business Address:** 173 BECKETT ST.  
PRETORIA, SOUTH AFRICA 0083

**Effective Date:** 05/21/2015

**Foreign Entity:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Country:** SOUTH AFRICA

**Securities Activities:** Yes

**Investment Advisory Activities:** Yes

**Description:** JOQUINN SADLER HAS OWNERSHIP IN BOTH IFS GROUP, THE PARENT COMPANY OF IFS SECURITIES, AND IS ALSO AN OWNER OF K2015091240 SOUTH AFRICA (PTY)LTD

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#### INVICTUS CAPITAL INVESTORS is under common control with the firm.

**CRD #:** 285851

**Business Address:** 3414 PEACHTREE RD. NE  
SUITE 1020  
ATLANTA, GA 30326

**Effective Date:** 01/30/2018

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** INVICTUS CAPITAL INVESTORS FKA IFS PLANNING INC, AND IFS SECURITIES, INC. HAVE COMMON OWNERSHIP AND CONTROL.

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#### SAN BLAS FUND, LP is under common control with the firm.

**Business Address:** 3414 PEACHTREE ROAD, NE SUITE 1020  
ATLANTA, GA 30326

**Effective Date:** 10/10/2014

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** Yes

**Description:** SAN BLAS, LP, IFS ADVISORY, LLC, AND IFS SECURITIES, INC., ARE COMMONLY MAJORITY OWNED BY ALEX MCKENZIE. IFS ADVISORY, LLC IS

## Firm Operations



### Organization Affiliates (continued)

COMMONLY, MAJORITY OWNED BY ALEX MCKENZIE. IFS ADVISORY, LLC IS THE GENERAL PARTNER OF SAN BLAS, LP.

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**SB ADVISORY, LLC is under common control with the firm.**

<b>CRD #:</b>	154680
<b>Business Address:</b>	3414 PEACHTREE ROAD NE ATLANTA, GA 30326
<b>Effective Date:</b>	09/30/2009
<b>Foreign Entity:</b>	No
<b>Country:</b>	
<b>Securities Activities:</b>	No
<b>Investment Advisory Activities:</b>	Yes
<b>Description:</b>	IFS SECURITIES, INC. AND SB ADVISORY, LLC. HAVE COMMON OWNERSHIP AND CONTROL.

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**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	3	0
Arbitration	N/A	1	N/A
Financial	1	0	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:**
  - 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 3

**Reporting Source:** Regulator

**Current Status:** Final



<b>Allegations:</b>	<p>SEC ADMIN RELEASE 34-86210 / JUNE 27, 2019: THE SECURITIES AND EXCHANGE COMMISSION DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE PROCEEDINGS BE INSTITUTED AGAINST IFS SECURITIES ("RESPONDENT" OR "IFS").</p> <p>ON THE BASIS OF THIS ORDER AND RESPONDENT'S OFFER, THE COMMISSION FINDS THAT THESE PROCEEDINGS INVOLVE A VIOLATION OF THE MUNICIPAL SECURITIES RULEMAKING BOARD'S ("MSRB") "FAIR DEALING" RULE BY RESPONDENT IN CONNECTION WITH A MUNICIPAL BOND OFFERING. IN 2014, RESPONDENT WAS ENGAGED BY THE HARVEY, ILLINOIS PUBLIC LIBRARY DISTRICT (THE "DISTRICT") TO UNDERWRITE THE ISSUANCE OF A \$6,000,000 OFFERING OF MUNICIPAL BONDS. THE ISSUANCE OF THE BONDS WAS INTENDED TO FINANCE THE EXPANSION AND RENOVATION OF THE DISTRICT'S LIBRARY BUILDING. AS THE SOLE UNDERWRITER OF THE BOND OFFERING, RESPONDENT WAS RESPONSIBLE FOR MARKETING AND SELLING THE DISTRICT'S BONDS TO INVESTORS. RESPONDENT ACTED NEGLIGENTLY IN SELLING THE BONDS AND SOLD THE BONDS AT A PRICE WHICH WAS BELOW MARKET PRICE FOR COMPARABLE BONDS AND WHICH WAS NOT FAIR TO THE DISTRICT. RESPONDENT THEREBY WILLFULLY VIOLATED MSRB RULE G-17 AND, BY REASON OF THAT VIOLATION, SECTION 15B(C)(1) OF THE EXCHANGE ACT.</p>
<b>Initiated By:</b>	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
<b>Date Initiated:</b>	06/27/2019
<b>Docket/Case Number:</b>	3-19220
<b>Principal Product Type:</b>	Debt - Municipal
<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>	Order
<b>Resolution Date:</b>	06/27/2019
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	Yes
<b>Sanctions Ordered:</b>	<p>Censure</p> <p>Monetary/Fine \$50,000.00</p>



**Other Sanctions Ordered:** UNDERTAKINGS ENUMERATED IN THE OFFER OF SETTLEMENT

**Sanction Details:** RESPONDENT HAS SUBMITTED AN OFFER OF SETTLEMENT (THE OFFER) WHICH THE COMMISSION HAS DETERMINED TO ACCEPT. IN VIEW OF THE FOREGOING, THE COMMISSION DEEMS IT APPROPRIATE IN THE PUBLIC INTEREST TO IMPOSE THE SANCTIONS AGREED TO IN THE RESPONDENT'S OFFER. ACCORDINGLY, IT IS HEREBY ORDERED THAT RESPONDENT IS CENSURED, IS TO PAY A CIVIL PENALTY FOR \$50,000, AND SHALL COMPLY WITH THE UNDERTAKINGS ENUMERATED IN THE OFFER OF SETTLEMENT. INCLUDING RETAINING AN INDEPENDENT CONSULTANT (THE "INDEPENDENT CONSULTANT"), NOT UNACCEPTABLE TO THE COMMISSION STAFF, TO CONDUCT A REVIEW OF RESPONDENT'S POLICIES AND PROCEDURES AS THEY RELATE TO MUNICIPAL SECURITIES UNDERWRITING. ADOPTING ALL RECOMMENDATIONS CONTAINED IN THE INDEPENDENT CONSULTANT'S REPORT WITHIN 90 DAYS OF THE DATE OF THAT REPORT, PROVIDED, HOWEVER, THAT WITHIN 30 DAYS OF THE REPORT, RESPONDENT SHALL ADVISE IN WRITING THE INDEPENDENT CONSULTANT AND THE COMMISSION STAFF OF ANY RECOMMENDATIONS THAT RESPONDENT CONSIDERS TO BE UNDULY BURDENSOME, IMPRACTICAL OR INAPPROPRIATE. CERTIFYING, IN WRITING, COMPLIANCE WITH THE UNDERTAKINGS. THE CERTIFICATION SHALL IDENTIFY THE UNDERTAKINGS, PROVIDE WRITTEN EVIDENCE OF COMPLIANCE IN THE FORM OF A NARRATIVE, AND BE SUPPORTED BY EXHIBITS SUFFICIENT TO DEMONSTRATE COMPLIANCE.

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** SEC ADMIN RELEASE 34-86210 / JUNE 27, 2019: THE SECURITIES AND EXCHANGE COMMISSION DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE PROCEEDINGS BE INSTITUTED AGAINST IFS SECURITIES ("RESPONDENT" OR "IFS"). ON THE BASIS OF THIS ORDER AND RESPONDENT'S OFFER, THE COMMISSION FINDS THAT THESE PROCEEDINGS INVOLVE A VIOLATION OF THE MUNICIPAL SECURITIES RULEMAKING BOARD'S ("MSRB") "FAIR DEALING" RULE BY RESPONDENT IN CONNECTION WITH A MUNICIPAL BOND OFFERING. IN 2014, RESPONDENT WAS ENGAGED BY THE HARVEY, ILLINOIS PUBLIC LIBRARY DISTRICT (THE "DISTRICT") TO UNDERWRITE THE ISSUANCE OF A \$6,000,000 OFFERING OF MUNICIPAL BONDS. THE ISSUANCE OF THE BONDS WAS INTENDED TO



FINANCE THE EXPANSION AND RENOVATION OF THE DISTRICT'S LIBRARY BUILDING. AS THE SOLE UNDERWRITER OF THE BOND OFFERING, RESPONDENT WAS RESPONSIBLE FOR MARKETING AND SELLING THE DISTRICT'S BONDS TO INVESTORS. RESPONDENT ACTED NEGLIGENTLY IN SELLING THE BONDS AND SOLD THE BONDS AT A PRICE WHICH WAS BELOW MARKET PRICE FOR COMPARABLE BONDS AND WHICH WAS NOT FAIR TO THE DISTRICT. RESPONDENT THEREBY WILLFULLY VIOLATED MSRB RULE G-17 AND, BY REASON OF THAT VIOLATION, SECTION 15B(C)(1) OF THE EXCHANGE ACT.

<b>Initiated By:</b>	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
<b>Date Initiated:</b>	06/27/2019
<b>Docket/Case Number:</b>	3-19220
<b>Principal Product Type:</b>	Debt - Municipal
<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>	Order
<b>Resolution Date:</b>	06/27/2019
<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$50,000.00
<b>Other Sanctions Ordered:</b>	UNDERTAKINGS ENUMERATED IN THE OFFER OF SETTLEMENT
<b>Sanction Details:</b>	RESPONDENT HAS SUBMITTED AN OFFER OF SETTLEMENT (THE OFFER) WHICH THE COMMISSION HAS DETERMINED TO ACCEPT. IN VIEW OF THE FOREGOING, THE COMMISSION DEEMS IT APPROPRIATE IN THE PUBLIC INTEREST TO IMPOSE THE SANCTIONS AGREED TO IN THE RESPONDENT'S OFFER. ACCORDINGLY, IT IS HEREBY ORDERED THAT RESPONDENT IS CENSURED, IS TO PAY A CIVIL PENALTY FOR \$50,000, AND SHALL COMPLY WITH THE UNDERTAKINGS ENUMERATED IN THE OFFER OF SETTLEMENT. INCLUDING RETAINING AN INDEPENDENT CONSULTANT (THE "INDEPENDENT





CONSULTANT"), NOT UNACCEPTABLE TO THE COMMISSION STAFF, TO CONDUCT A REVIEW OF RESPONDENT'S POLICIES AND PROCEDURES AS THEY RELATE TO MUNICIPAL SECURITIES UNDERWRITING. ADOPTING ALL RECOMMENDATIONS CONTAINED IN THE INDEPENDENT CONSULTANT'S REPORT WITHIN 90 DAYS OF THE DATE OF THAT REPORT, PROVIDED, HOWEVER, THAT WITHIN 30 DAYS OF THE REPORT, RESPONDENT SHALL ADVISE IN WRITING THE INDEPENDENT CONSULTANT AND THE COMMISSION STAFF OF ANY RECOMMENDATIONS THAT RESPONDENT CONSIDERS TO BE UNDULY BURDENSOME, IMPRACTICAL OR INAPPROPRIATE. CERTIFYING, IN WRITING, COMPLIANCE WITH THE UNDERTAKINGS. THE CERTIFICATION SHALL IDENTIFY THE UNDERTAKINGS, PROVIDE WRITTEN EVIDENCE OF COMPLIANCE IN THE FORM OF A NARRATIVE, AND BE SUPPORTED BY EXHIBITS SUFFICIENT TO DEMONSTRATE COMPLIANCE.

#### Disclosure 2 of 3

<b>Reporting Source:</b>	Regulator
<b>Current Status:</b>	Final
<b>Allegations:</b>	FROM IN OR ABOUT AUGUST 2016 UNTIL FEBRUARY 2018, IFS SECURITIES, INC. (IFS) EMPLOYED AN AGENT TO REPRESENT IFS WHO, WHILE REGISTERED AS AN INVESTMENT ADVISOR REPRESENTATIVE WITH IFS ADVISORY, LLC, AN AFFILIATE OF IFS, WAS NEITHER REGISTERED NOR EXEMPT FROM REGISTRATION AS AN AGENT PURSUANT TO THE PENNSYLVANIA SECURITIES ACT OF 1972.
<b>Initiated By:</b>	PENNSYLVANIA DEPARTMENT OF BANKING AND SECURITIES - DEPUTY CHIEF COUNSEL STEFANIE HAMILTON 215.239.2327
<b>Date Initiated:</b>	10/04/2018
<b>Docket/Case Number:</b>	180068
<b>URL for Regulatory Action:</b>	
<b>Principal Product Type:</b>	No Product
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Civil and Administrative Penalt(ies) /Fine(s)
<b>Other Sanction(s)/Relief Sought:</b>	



**Resolution:** Other

**Resolution Date:** 10/04/2018

**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 \$15,000.00

**Other Sanctions Ordered:** IFS IS ORDERED TO COMPLY WITH ALL RELEVANT SECTIONS OF THE PENNSYLVANIA SECURITIES ACT OF 1972.

**Sanction Details:** PER ITEM #13A, ADMINISTRATIVE ASSESSMENT PAID 10/10/2018.

**Regulator Statement** PER ITEM #10, MATTER WAS RESOLVED BY CONSENT AGREEMENT AND ORDER (CAO). IFS, IN LIEU OF LITIGATION, AND WITHOUT ADMITTING OR DENYING THE ALLEGATIONS HEREIN, AND INTENDING TO BE LEGALLY BOUND, HEREBY AGREES TO THE TERMS OF THIS CAO.

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** IFS SECURITIES, INC.(IFS) EMPLOYED AN AGENT TO REPRESENT IFS WHO, WHILE REGISTERED AS AN INVESTMENT ADVISOR REPRESENTATIVE WITH IFS ADVISORY, LLC, AN AFFILIATE OF IFS, WAS NETHER REGISTERED NOR EXEMPT FROM REGISTRATION AS AN AGENT PURSUANT TO THE 1972 ACT.

**Initiated By:** COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF BANKING AND SECURITIES, BUREAU OF SECURITIES COMPLIANCE AND EXAMINATIONS

**Date Initiated:** 10/04/2018

**Docket/Case Number:** 180068 (SEC-CAO)

**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



<b>Resolution Date:</b>	10/04/2018
<b>Sanctions Ordered:</b>	Monetary/Fine \$15,000.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	WITHIN THIRTY (30) DAYS OF THE EFFECTIVE DATE OF THE ORDER, IFS HAD TO PAY THE DEPARTMENT AN ADMINISTRATIVE ASSESSMENT IN THE AMOUNT OF \$15,000.00, WHICH WAS DONE ON OCTOBER 4TH, 2018.
<b>Firm Statement</b>	THE AGENT IN QUESTION WAS DUALY REGISTERED WITH IFS SECURITIES AND IFS ADVISORY, AS WELL AS THE STATE, FROM DECEMBER 2011 TO AUGUST 2016 . THE AGENT'S BUSINESS PRIMARILY FOCUSED ON ADVISORY SERVICES AND IN AUGUST 2016 HIS REGISTRATION WAS TERMINATED WITH THE BROKER/DEALER BUT MAINTAINED ON THE RIA. THE FIRM HAD A SYSTEM IN PLACE TO WITHHOLD ANY 12B FEES FROM THE AGENT, BUT UNFORTUNATELY DID NOT CATCH ALL BETWEEN AUGUST 2016 - DECEMBER 2016. WE RE-REGISTERED THE REP WITH THE BROKER/DEALER AND STATE ON JANUARY 2018.

### Disclosure 3 of 3

<b>Reporting Source:</b>	Regulator
<b>Current Status:</b>	Final
<b>Allegations:</b>	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT SOLD (OR BOUGHT) CORPORATE BONDS TO (OR FROM) CUSTOMERS AND FAILED TO SELL (OR BUY) 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.
<b>Initiated By:</b>	FINRA
<b>Date Initiated:</b>	02/02/2015
<b>Docket/Case Number:</b>	2013036027001
<b>Principal Product Type:</b>	Debt - Corporate
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Other
<b>Other Sanction(s)/Relief Sought:</b>	N/A



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

**Resolution Date:** 02/02/2015

**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

**Other Sanctions Ordered:**

**Sanction Details:** THE FIRM IS CENSURED AND FINED \$5,000.

FINE PAID IN FULL ON FEBRUARY 19, 2015.

**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** NINE(9)BOND TRANSACTIONS WERE FOUND TO HAVE BEEN SOLD (OR BOUGHT) TO (OR FROM) CUSTOMERS AT PRICES THAT WERE DEEMED TO BE EXCESSIVE.

**Initiated By:** FINRA

**Date Initiated:** 11/10/2014

**Docket/Case Number:** 2013036027001

**Principal Product Type:** Debt - Corporate

**Other Product Type(s):**

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

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

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

**Resolution Date:** 02/02/2015

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



**Other Sanctions Ordered:**

CENSURE.

**Sanction Details:**

FINE OF \$5,000.00.

**Firm Statement**

FINRA FOUND, IN NINE TRANSACTIONS, THE FIRM SOLD (OR BOUGHT) CORPORATE BONDS TO (OR FROM) CUSTOMERS AND FAILED TO SELL (OR BUY) 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 THE FIRM WAS ENTITLED TO A PROFIT. FIRM SETTLED FOR \$5,000.00.



## 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](http://www.finra.org/awardsonline).

### Disclosure 1 of 1

<b>Reporting Source:</b>	Regulator
<b>Type of Event:</b>	ARBITRATION
<b>Allegations:</b>	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-FAILURE TO SUPERVISE
<b>Arbitration Forum:</b>	NASD
<b>Case Initiated:</b>	12/14/2004
<b>Case Number:</b>	04-07175
<b>Disputed Product Type:</b>	NO OTHER TYPE OF SEC INVOLVE; MUTUAL FUNDS
<b>Sum of All Relief Requested:</b>	\$25,000.00
<b>Disposition:</b>	AWARD AGAINST PARTY
<b>Disposition Date:</b>	10/21/2005
<b>Sum of All Relief Awarded:</b>	\$15,000.01

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



## Financial - Pending

This type of disclosure event involves a bankruptcy or Securities Investor Protection Corporation liquidation filed within the last 10 years that is currently pending.

### Disclosure 1 of 1

<b>Reporting Source:</b>	Regulator
<b>Action Pending?</b>	Yes
<b>Financial Event:</b>	Bankruptcy
<b>Date Initiated:</b>	04/24/2020
<b>Court Details:</b>	UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF GEORGIA, CASE #20-65841-LRC, CHAPTER 11.
<b>Summary of Events:</b>	N/A

**End of Report**



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