BrokerCheck Report

1717 CAPITAL MANAGEMENT COMPANY

CRD# 4082

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.

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.

1717 CAPITAL MANAGEMENT COMPANY

CRD# 4082

SEC# 8-14657

Main Office Location

300 CONTINENTAL DRIVE
D2E
NEWARK, DE 19713-4329

Mailing Address

CHRISTIANA EXECUTIVE CAMPUS
P.O. BOX 15626
WILMINGTON, DE 19850

Business Telephone Number

302-453-3800

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 01/22/1969.

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	4
Arbitration	1
Bond	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.

Date firm ceased business:	08/01/2008
Does this brokerage firm owe any money or securities to any customer or brokerage firm?	No

Firm Profile

This firm is classified as a corporation.

This firm was formed in Pennsylvania on 01/22/1969.

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.

1717 CAPITAL MANAGEMENT COMPANY

Doing business as 1717 CAPITAL MANAGEMENT COMPANY

CRD# 4082

SEC# 8-14657

Main Office Location

300 CONTINENTAL DRIVE
D2E
NEWARK, DE 19713-4329

Mailing Address

CHRISTIANA EXECUTIVE CAMPUS
P.O. BOX 15626
WILMINGTON, DE 19850

Business Telephone Number

302-453-3800

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):	FOSTER, DOUGLAS WAYNE 4395571
Is this a domestic or foreign entity or an individual?	Individual
Position	VICE PRESIDENT
Position Start Date	08/2003
Percentage of Ownership	Less than 5%
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

Legal Name & CRD# (if any):	NATIONWIDE CORPORATION
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	NATIONWIDE FINANCIAL SERVICES, INC.
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	10/2002
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):	NATIONWIDE FINANCIAL SERVICES, INC.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	NATIONWIDE LIFE INSURANCE COMPANY OF AMERICA
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	10/2002
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):	NATIONWIDE LIFE INSURANCE COMPANY OF AMERICA
Is this a domestic or foreign entity or an individual?	Domestic Entity

Firm Profile

Indirect Owners (continued)

Company through which indirect ownership is established	NATIONWIDE PROVIDENT HOLDING COMPANY
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	11/2002
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 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 07/18/1969 to 11/03/2008.

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 10 types of businesses.

Types of Business

Broker or dealer retailing corporate equity securities over-the-counter
Broker or dealer selling corporate debt securities
Mutual fund retailer
U S. government securities broker
Municipal securities broker
Broker or dealer selling variable life insurance or annuities
Put and call broker or dealer or option writer
Investment advisory services
Non-exchange member arranging for transactions in listed securities by exchange member
Other - UNIT INVESTMENT TRUSTS AND REAL ESTATE INVESTMENT TRUSTS.

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: THE APPLICANT IS ENGAGED ON NON-SECURITIES INSURANCE AND ANNUITY BROKERAGE BUSINESS BY VIRTUE OF BUSINESS CONDUCTED THROUGH ITS AFFILIATE, 1717 BROKERAGE SERVICES, INC., 1717 INSURANCE AGENCY OF MASSACHUSETTS AND 1717 INSURANCE AGENCY OF TEXAS.

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:	PERSHING LLC
CRD #:	7560
Business Address:	PERSHING PLAZA JERSEY CITY, NJ 07399
Effective Date:	09/21/1983
Description:	CLEAR SECURITIES TRANSACTIONS ON A FULLY DISCLOSED BASIS THROUGH PERSHING.

Firm Operations

Industry Arrangements

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

Name:	NATIONWIDE LIFE INSURANCE COMPANY OF AMERICA
Business Address:	1000 CHESTERBROOK BLVD. BERWYN, PA 19312-1181
Effective Date:	10/01/2002
Description:	AS A MATTER OF ACCOUNTING CONTROL BY NATIONWIDE LIFE INSURANCE COMPANY OF AMERICA, THE APPLICANT'S BANK STATEMENTS, CANCELLED CHECKS AND CASH RECONCILIATIONS ARE MAINTAINED BY THEM.

Name:	NATIONWIDE LIFE INSURANCE COMPANY OF AMERICA
Business Address:	1000 CHESTERBROOK BLVD. BERWYN, PA 19312
Effective Date:	01/22/1969
Description:	NATIONWIDE LIFE INSURANCE COMPANY OF AMERICA THE ULTIMATE CORPORATE PARENT OF 1717 CAPITAL MANAGEMENT COMPANY, THE APPLICANT. AS A MATTER OF ACCOUNTING CONTROL BY NATIONWIDE LIFE INSURANCE COMPANY OF AMERICA, THE APPLICANT'S BANK STATEMENTS, CANCELLED CHECKS AND CASH RECONCILATIONS ARE MAINTAINED BY THEM. IN ADDITION, NATIONWIDE LIFE INSURANCE COMPANY OF AMERICA MAINTAINS AND AUDITS TRAVEL EXPENSE REPORTS RELEVANT TO THE APPLICANT.

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, 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.

NATIONWIDE ASSET MANAGEMENT, LLC is under common control with the firm.

CRD #:	143668
Business Address:	ONE NATIONWIDE PLAZA 1-20-19 COLUMBUS, OH 43215
Effective Date:	06/20/2007
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	NATIONWIDE ASSET MANAGEMENT, LLC IS AN INDIRECT SUBSIDIARY OF NATIONWIDE CORPORATION. NATIONWIDE CORPORATION IS AN UPSTREAM PARENT COMPANY OF 1717 CAPITAL MANAGEMENT COMPANY.

NATIONWIDE INVESTMENT ADVISORS, LLC is under common control with the firm.

CRD #:	142373
Business Address:	ONE NATIONWIDE PLAZA, 1-07-11 COLUMBUS, OH 43215
Effective Date:	10/02/2006
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	NATIONWIDE INVESTMENT ADVISERS, LLC IS AN INDIRECT SUBSIDIARY OF

Firm Operations

Organization Affiliates (continued)

	NATIONWIDE CORPORATION. NATIONWIDE CORPORATION IS AN UPSTREAM PARENT COMPANY OF 1717 CAPITAL MANAGEMENT COMPANY.

MULLIN TBG ADVISORY SERVICES, LLC is under common control with the firm.

CRD #:	141445
Business Address:	610 NEWPORT CENTER DRIVE, SUITE 950 NEWPORT BEACH, CA 92660
Effective Date:	09/18/2006
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	MULLIN TBG ADVISORY SERVICES, LLC IS AN INDIRECT SUBSIDIARY OF NATIONWIDE CORPORATION. NATIONWIDE CORPORATION IS AN UPSTREAM PARENT COMPANY OF 1717 CAPITAL MANAGEMENT COMPANY.

NATIONWIDE LIFE INSURANCE COMPANY OF AMERICA controls the firm.

Business Address:	1000 CHESTERBROOK BLVD. BERWYN, PA 19312
Effective Date:	11/15/2002
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	No
Description:	NATIONWIDEPROVIDENT HOLDING CO. OWNS 100% OF THE OUTSTANDING SHRS OF APPLICANT,NP HOLDING CO WHOLLY OWNED SUBSIDIARY OF NW LIFE INS CO(SEC-REGISTRANT AND ISSUER OF SECURITIES).NW LIFE INS. CO. OF AM. IS WHOLLY OWNED BY NATIONWIDE FIN. SRVS,INC., A PUBLIC COMPANY WITH STOCK TRADED ON THE NYSE.NFS,INC. WHOLLY OWNS OTHER SEC REGS. ISSUING SECURITES,INCLUDING BUT NOT LMTD TO NATIONWIDE LIFE INS CO AND NATIONWIDE LIFE AND ANNUITY CO. AFFILIATED BY COMMON OWNRSHP AND CNTRL WITH NLACA-SEC-REGR ISSUING SECURITIES.

Firm Operations

Organization Affiliates (continued)

NATIONWIDE FUND ADVISORS is under common control with the firm.

CRD #:	109391
Business Address:	1200 RIVER ROAD CONSHOHOCKEN, PA 19428
Effective Date:	10/01/2002
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	NATIONWIDE FUND ADVISORS IS AN INDIRECT SUBSIDIARY OF NATIONWIDE CORPORATION. NATIONWIDE CORPORATION IS AN UPSTREAM PARENT COMPANY OF 1717 CAPITAL MANAGEMENT COMPANY

NORTHPOINTE CAPITAL LLC is under common control with the firm.

CRD #:	109383
Business Address:	COLUMBIA CENTER 101 WEST BIG BEAVER ROAD, SUITE 745 TROY, MI 48084
Effective Date:	10/01/2002
Foreign Entity:	No
Country:	10/01/2007
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	NORTHPOINTE CAPITAL LLCIS AN INDIRECT SUBSIDIARY OF NATIONWIDE CORPORATION. NATIONWIDE CORPORATION IS AN UPSTREAM PARENT COMPANY OF 1717 CAPITAL MANAGEMENT COMPANY

NATIONWIDE SA CAPITAL TRUST is under common control with the firm.

CRD #:	109367
Business Address:	1200 RIVER ROAD CONSHOHOCKEN, PA 19428

Firm Operations

Organization Affiliates (continued)

Effective Date: 10/01/2002

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: NATIONWIDE SA CAPITAL TRUST IS AN INDIRECT SUBSIDIARY OF NATIONWIDE CORPORATION. NATIONWIDE CORPORATION IS AN UPSTREAM PARENT COMPANY OF 1717 CAPITAL MANAGEMENT COMPANY

NATIONWIDE FUND DISTRIBUTORS LLC is under common control with the firm.

CRD #: 25910

Business Address: 1200 RIVER ROAD
CONSHOHOCKEN, PA 19428

Effective Date: 10/01/2002

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: NATIONWIDE FUND DISTRIBUTORS, LLC IS AN INDIRECT SUBSIDIARY OF NATIONWIDE CORPORATION. NATIONWIDE CORPORATION IS AN UPSTREAM PARENT COMPANY OF 1717 CAPITAL MANAGEMENT COMPANY

NATIONWIDE INVESTMENT SERVICES CORPORATION is under common control with the firm.

CRD #: 7110

Business Address: TWO NATIONWIDE PLAZA
COLUMBUS, OH 43215

Effective Date: 10/01/2002

Foreign Entity: No

Country:

Securities Activities: Yes

Firm Operations

Organization Affiliates (continued)

Investment Advisory Activities: No

Description: NATIONWIDE INVESTMENT SERVICES CORPORATION IS AN INDIRECT SUBSIDIARY OF NATIONWIDE CORPORATION. NATIONWIDE CORPORATION IS AN UPSTREAM PARENT COMPANY OF 1717 CAPITAL MANAGEMENT COMPANY

NATIONWIDE SECURITIES, INC. is under common control with the firm.

CRD #: 11173

Business Address: 300 CONTINENTAL DR.
D2E
WILMINGTON, DE 19713

Effective Date: 10/01/2002

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: NATIOWIDE SECURITIES, INC. IS AN INDIRECT SUBSIDIARY OF NATIONWIDE CORPORATION. NATIONWIDE CORPORATION IS AN UPSTREAM PARENT COMPANY OF 1717 CAPITAL MANAGEMENT COMPANY.

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

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

Disclosure Events

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

	Pending	Final	On Appeal
Regulatory Event	0	4	0
Arbitration	N/A	1	N/A
Bond	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:**
    - A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
3. **Disclosure events in BrokerCheck reports come from different sources:**
    - Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
4. **There are different statuses and dispositions for disclosure events:**
    - A disclosure event may have a status of *pending, on appeal,* or *final.*
        - A "pending" event involves allegations that have not been proven or formally adjudicated.
        - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
        - A "final" event has been concluded and its resolution is not subject to change.
    - A final event generally has a disposition of *adjudicated, settled* or *otherwise resolved.*
        - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
        - A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
        - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
5. **You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.**

Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

Disclosure 1 of 4

Reporting Source:	Regulator
Current Status:	Final

Allegations:	NASD RULES 2110, 3010 - RESPONDENT MEMBER FAILED TO ENFORCE WRITTEN SUPERVISORY PROCEDURES FOR SPECIAL SUPERVISION OF REGISTERED REPRESENTATIVES WHO HAD A HISTORY OF CUSTOMER COMPLAINTS.
Initiated By:	NASD
Date Initiated:	08/10/2005
Docket/Case Number:	E112002095801
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	08/10/2005
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 $25,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, 1717 CAPITAL MANAGEMENT COMPANY CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE THE FIRM IS CENSURED AND FINED $25,000.

Reporting Source:	Firm
Current Status:	Final
Allegations:	NASD FOUND VIOLATIONS OF 3010 AND 2110 FOR FAILING TO ENFORCE REQUIREMENTS OF PLAN OF SPECIAL SUPERVISION ESTABLISHED FOR 4 REGISTERED REPRESENTATIVES.
Initiated By:	NASD, BOSTON DISTRICT OFFICE

Date Initiated:	08/10/2005
Docket/Case Number:	E112002095801
Principal Product Type:	Other
Other Product Type(s):	NASD DETERMINED THAT 1717 CAPITAL MANAGEMENT COMPANY FAILED TO ENFORCE CERTAIN REQUIREMNTS OF PLAN OF SPECIAL SUPERVISION ESTABLISHED FOR 4 REGISTERED REPRESENTATIVES.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	08/10/2005
Sanctions Ordered:	Censure Monetary/Fine $25,000.00
Other Sanctions Ordered:	
Sanction Details:	IN ACCEPTING THE NASD'S FINDINGS, 1717 CAPITAL MANAGEMENT COMPANY CONSENTED TO CENSURE AND A $25,000.00 FINE.
Firm Statement	ACCEPTANCE, WAIVER AND CONSENT EXECUTED AUGUST 9, 2005 WITH $25,000.00 PAID AUGUST 29, 2005.

Disclosure 2 of 4

Reporting Source:	Firm
Current Status:	Final
Allegations:	THE COMPLAINT ALLEDGED THAT APPLICANT, ACTING THROUGH ITS REGISTERED PRINCIPAL, CRESAP, VIOLATED SECTIONS 1 AND 27(A) OF THE RULES OF FAIR PRACTICE OF THE NASD BY FAILING TO ESTABLISH, MAINTAIN AND ENFORCE WRITTEN PROCEDURES ENABLING THEM TO SUPERVISE PROPERLY THE ACTIVITIES OF ONE OF THE FORMER REGISTERED REPRESENTATIVES.
Initiated By:	NASD DISTRICT BUSINESS CONDUCT COMMITTEE
Date Initiated:	08/29/1986
Docket/Case Number:	COMPLAINT NO. CLE-290
Principal Product Type:	Other
Other Product Type(s):	VIOLATION OF SECTIONS 1 AND 27 (A) OF THE RULES OF FAIR PRACTICE.

Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	09/18/1987
Sanctions Ordered:	Monetary/Fine $10,000.00
Other Sanctions Ordered:	
Sanction Details:	$10,000.00 FINE WAS PAID SEPTEMBER 18, 1987.
Firm Statement	THE APPLICANT AND ITS PRESIDENT DENIED THE COMPLAINT OF FAILING TO ESTABLISH WRITTEN PROCEDURES. TO THE CONTRARY, THEY ALLEGE THAT RESPONDENDT APPLICANT, ACTING THROUGH ITS PRESIDENT, ESTABLISHED, MAINTAINED AND DILIGENTLY ENFORCED WRITTEN PROCEDURES WHICH ENABLED IT TO SUPERVISE PROPERLY THE ACTIVITIES OF THE FORMER REGISTERED REPRESENTATIVE TO ENSURE COMPLIANCE WITH THE APPLICABLE SECURITIES LAWS AND REGULATIONS. IN ORDER TO RESOLVE THIS SITUATION, THE APPLICANT AND ITS PRESIDENT SUBMITTED A JOINT OFFER OF SETTLEMENT (OFFER) DATED MARCH 6, 1987. OFFER WAS ACCEPTED BY BOTH THE DBCC FOR DISTRICT 9 AND THE NATION BUSINESS CONDUCT COMMITTEE.

Disclosure 3 of 4

Reporting Source:	Regulator
Current Status:	Final
Allegations:	According to records on file at the Central Registration Depository ("CRD"), 1717 Capital Management Company maintains a branch office at 300 Centerville Road in Warwick, RI. The individual designated as supervisor of that branch office, Shawn Dooley, has not passed the NASD General Securities Principal Qualification Examination (Series 24), in violation of Rule 207a-1.3, promulgated pursuant to the Rhode Island Uniform Securities Act of 1990 ("RIUSA").
Initiated By:	RI DEPARTMENT OF BUSINESS REGULATION; SECURITIES DIVISION
Date Initiated:	05/04/1998
Docket/Case Number:	98-0042

URL for Regulatory Action:	
Principal Product Type:	
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	05/04/1998
Sanctions Ordered:	Monetary/Fine $5,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	Consent Order entered May 4, 1998, ordering that 1717 shall immediately cease and desisit from any further violation of Section 207 of RIUSA; Dooley shall take the S-24 exam within 60 days of the date of the Order, and 1717 shall promptly report the examination results to the RI Securities Division. During this period, Dana Darlington, a Series 26 qualified sales representative, shall spend at least 3 days per week in the Warwick office, acting as supervisor. Should Dooley fail the Series 24 exam, 1717 shall immediately designate another individual, qualified and located in the Warwick office, to act as supervisor of the branch office; and 1717 shall pay a civil penalty of $5,000 to the RI Securities Division.
Regulator Statement	Consent Order, $5,000 penalty, to resolve violation of RIUSA's Rule 207a-1.3. CONTACT: MARIA PICCIRILLI, 401-222-3048.

Reporting Source:	Firm
Current Status:	Final
Allegations:	THE INDIVIDUAL DESIGNATED AS SUPERVISOR FOR THE RHODE ISLAND BRANCH OFFICE DID NOT MAINTAIN THE CORRECT SECURITIES PRINCIPAL QUALIFICATION EXAMINATION (SERIES 24). VIOLATION OF RIUSA'S RULE 207A-1.3
Initiated By:	RHODE ISLAND DEPT. OF BUSINESS REGULATIONS; SECURITIES DIVISION

Date Initiated:	02/24/1998
Docket/Case Number:	98-0042
Principal Product Type:	Other
Other Product Type(s):	SUPERVISOR DID NOT MAINTAIN CORRECT SECURITIES PRINCIPAL EXAMINATION AS REQUIRED BY THE STATE OF RHODE ISLAND.
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	05/04/1998
Sanctions Ordered:	Monetary/Fine $5,000.00
Other Sanctions Ordered:	
Sanction Details:	$5000.00 WAS PAID ON 5/4/1998 TO THE STATE OF RHODE ISLAND.
Firm Statement	CONSENT ORDER SIGNED WITHOUT ADMISSION OF GUILT OR WRONGDOING. CIVIL PENALTY OF $5000.00 HAS BEEN PAID TO THE RI SECURITIES DIVISION. SUPERVISOR PASSED THE SERIES 24 EXAMINATION AS REQUIRED.

Disclosure 4 of 4

Reporting Source:	Regulator
Current Status:	Final
Allegations:	N
Initiated By:	STATE OF MICHIGAN/CORPORATION AND SECURITIES BUREAU GS/LE
Date Initiated:	03/01/1993
Docket/Case Number:	SS7224
URL for Regulatory Action:	
Principal Product Type:	
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	

Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	11/02/1993
Sanctions Ordered:	
Other Sanctions Ordered:	
Sanction Details:	ON 11/2/93 THE BUREAU ISSUED A CONSENT ORDER TO IMPOSE COSTS PURSUANT TO THE MI UNIFORM SEC. ACT FOR THE RESPONDENT DID NOT PREVENT THE OFFER AND SALE OF UNREGISTERED NONEXEMPT SEC. AND DID NOT MAKE HOME OFFICE FIELD INSPECTIONS FIELD AUDITS AND COMPLIANCE PRESENTATIONS AND THE EQUITY COORDINATOR DID NOT NOTIFY RESPONDENT OF THE AGENTS IMPROPER ACTIVITY THEREFORE FAILED TO REASONABLY SUPERVISE AS REQUIRED BY SECTION 204(a)(2) OF THE ACT RESPONDENT WAS ALSO CHARGED WITH VIOLATING SECTION 204(a)(1)(B) VIOLATED OR FAILED TO COMPLY WITH THE ACT RULES OR AN ORDER RESPONDENT ADMITS THE AFOREMENTIONED FACTUAL ALLEGATIONS ARE TRUE AND CORRECT WITHOUT ADMITTING OR DENYING THAT SUCH FACTS CONSTITUTE VIOLATIONS OF THE ACT RESPONDENT PAID $10,000 FOR THE COSTS OF THE INVESTIGATION.
Regulator Statement	SEE ABOVE CONTACT: GERRY SHEPPARD (517) 334-6209

Reporting Source:	Firm
Current Status:	Final
Allegations:	FAILURE TO ADEQUATELY SUPERVISE REGISTERED REPRESENTATIVE WHO ENGAGED IN PRIVATE SECURITIES TRANSACTIONS.
Initiated By:	STATE OF MICHIGAN, DEPARTMENT OF COMMERCE
Date Initiated:	03/01/1993
Docket/Case Number:	SS7224
Principal Product Type:	Other
Other Product Type(s):	PRIVATE SECURITIES TRANSACTIONS
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	02/15/1994
Sanctions Ordered:	Monetary/Fine $10,000.00
Other Sanctions Ordered:	
Sanction Details:	$10,000.00 WAS PAID TO THE STATE TO REIMBURSE THE INVESTIGATION COSTS.
Firm Statement	RESOLVED AND DISMISSED WITH THE STATE BY ENTRY OF AN AGREEMENT TO PROVIDE INCREASED OVERSIGHT OF SECURITIES ACTIVITIES AND THE PAYMENT OF $10,000.00 TO REIMBURSE THE STATE FOR THE COSTS OF INVESTIGATION.

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 1

Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE
Arbitration Forum:	NASD
Case Initiated:	05/12/2006
Case Number:	06-02307
Disputed Product Type:	ANNUITIES; NO OTHER TYPE OF SEC INVOLVE; MUTUAL FUNDS
Sum of All Relief Requested:	$95,000.00
Disposition:	AWARD AGAINST PARTY
Disposition Date:	10/15/2008
Sum of All Relief Awarded:	$99,294.56

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

Civil Bond

This type of disclosure event involves a civil bond for the brokerage firm that has been denied, paid, or revoked by a bonding company.

Disclosure 1 of 3

Reporting Source:	Firm
Policy Holder:	1717 CAPITAL MANAGEMENT COMPANY
Bonding Company Name:	NATIONAL UNION FIRE INSURANCE COMPANY
Disposition:	Payout
Disposition Date:	01/17/2006
Payout Details:	IN JANUARY OF 2006, A PAYMENT OF $575,286.00 WAS MADE TO 1717 CAPITAL MANAGEMENT COMPANY UNDER ITS FINANCIAL INSTITUTION BOND.
Firm Statement	1717 CAPITAL MANAGEMENT COMPANY MADE A CLAIM UNDER ITS FINANCIAL INSTITUTION BOND. THIS IS A REIMBURSEMENT OF 1717 CAPITAL MANAGEMENT COMPANY LOSSES IN THE PETER MCKINNON NASD ARBIRTRATIONS PURSUANT TO THE FIDELITY BOND.

Disclosure 2 of 3

Reporting Source:	Firm
Policy Holder:	1717 CAPITAL MANAGEMENT COMPANY
Bonding Company Name:	RELIANCE INSURANCE COMPANY
Disposition:	Payout
Disposition Date:	06/20/2000
Payout Details:	ON JUNE 20, 2000 A PAYMENT OF $133,373.24 WAS MADE UNDER 1717 CAPITAL MANAGEMENT COMANY'S FINANCIAL INSTITUTION BOND.
Firm Statement	1717 CAPITAL MANAGEMENT COMPANY MADE A CLAIM UNDER ITS FINANCIAL INSTITUTION BOND FOR PECUNIARY LOSSES INCURRED BY THE FIRM AS A RESULT OF THE FRAUDULENT AND DISHONEST ACTS OF DANIEL J. DIPOALO, A FORMER REGISTERED REPRESENTATIVE.

Disclosure 3 of 3

Reporting Source:	Firm
Policy Holder:	1717 CAPITAL MANAGEMENT COMPANY
Bonding Company Name:	RELIANCE INSURANCE COMPANY

Disposition:	Payout
Disposition Date:	06/02/1998
Payout Details:	IN JUNE OF 1998, A PAYMENT OF $74,242.26 WAS MADE TO 1717 CAPITAL MANAGEMENT COMPANY UNDER ITS FINANCIAL INSTITUTION BOND.
Firm Statement	1717 CAPITAL MANAGEMENT COMPANY MADE A CLAIM UNDER ITS FINANCIAL INSTITUTION BOND FOR PECUNIARY LOSSES INCURRED BY THE FIRM AS A RESULT OF THE FRAUDULENT AND DISHONEST ACTS OF DANIEL J. DIPOALO, A FORMER REGISTERED REPRESENTATIVE.

End of Report

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