

BrokerCheck Report

J. BUSH & CO., INCORPORATED

CRD# 5355

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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.

• **Thank you for using FINRA BrokerCheck.**



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



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



J. BUSH & CO., INCORPORATED
CRD# 5355
SEC# 8-16040

Main Office Location
55 WHITNEY AVENUE
NEW HAVEN, CT 06510

Mailing Address
55 WHITNEY AVENUE
NEW HAVEN, CT 06510

Business Telephone Number
(203) 777-5900

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 07/31/1970.
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	2

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: 02/01/2005

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 Delaware on 07/31/1970.

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. BUSH & CO., INCORPORATED

Doing business as J. BUSH & CO., INCORPORATED

CRD# 5355

SEC# 8-16040

Main Office Location

55 WHITNEY AVENUE
NEW HAVEN, CT 06510

Mailing Address

55 WHITNEY AVENUE
NEW HAVEN, CT 06510

Business Telephone Number

(203) 777-5900



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): RIGGS BANK NA

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

Position SHAREHOLDER

Position Start Date 10/1997

Percentage of Ownership 75% or more

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

Is this a public reporting company?

Legal Name & CRD# (if any): BEESE, JOHN CARTER JR

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

Position DIRECTOR

Position Start Date 11/2004

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

Legal Name & CRD# (if any): BUSH, JONATHAN JAMES

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

Position CHAIRMAN, CHIEF EXECUTIVE OFFICER

Position Start Date 07/1970

Percentage of Ownership Less than 5%

Firm Profile



Direct Owners and Executive Officers (continued)

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

Is this a public reporting company? No

Legal Name & CRD# (if any): DUDLEY, HENRY ANDERSON JR

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

Position DIRECTOR

Position Start Date 10/1997

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

Legal Name & CRD# (if any): MILMAN, MARY THERESA
835458

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

Position TREASURER/DIRECTOR

Position Start Date 02/2002

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

Legal Name & CRD# (if any): MORNEAULT, HENRY D

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

Firm Profile



Direct Owners and Executive Officers (continued)

Position	DIRECTOR
Position Start Date	02/2002
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):	RIGGS NATIONAL CORPORATION
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	RIGGS BANK NA
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	10/1997
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	Yes

Legal Name & CRD# (if any):	ALLBRITTON, BARBARA BALFANZ
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	RIGGS NATIONAL CORPORATION
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	10/1997
Percentage of Ownership	25% but less than 50%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	ALLBRITTON, JOE LEWIS
Is this a domestic or foreign entity or an individual?	Individual

Firm Profile



Indirect Owners (continued)

Company through which indirect ownership is established	RIGGS NATIONAL CORPORATION
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	10/1997
Percentage of Ownership	25% but less than 50%
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 09/23/1970 to 04/04/2005.

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 5 types of businesses.

Types of Business

Broker or dealer making inter-dealer markets in corporation securities over-the-counter
Broker or dealer retailing corporate equity securities over-the-counter
Underwriter or selling group participant (corporate securities other than mutual funds)
Investment advisory services
Broker or dealer selling tax shelters or limited partnerships in primary distributions

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:	TRADITION ASIEL SECURITIES INC.
CRD #:	28269
Business Address:	75 PARK PLACE NEW YORK, NY 10007
Effective Date:	11/02/1977
Description:	APPLICANT HAS AN AGREEMENT WITH TRADITION ASIEL SECURITIES INC.(CLEARING THROUGH PERSHING & CO.), APPROVED BY THE NEW YORK STOCK EXCHANGE, UNDER WHICH PERSHING & CO. CARRIES ACCOUNTS OF SECURITIES CUSTOMERS OF APPLICANT ON A FULLY DISCLOSED BASIS SUBJECT TO THE SAME CONDITIONS AS THE ACCOUNTS OF ASIEL'S OTHER CUSTOMERS. APPLICANT IS PRIMARILY RESPONSIBLE FOR SECURING SUCH ESSENTIAL INFORMATION REGARDING NEW CUSTOMERS. ALL SUCH CUSTOMERS OF APPLICANT FORWARD THEIR CHECKS, FUNDS AND SECURITIES TO PERSHING

Firm Operations

Industry Arrangements



This firm does not have books or records maintained by a third party.

This firm does not have accounts, funds, or securities maintained by a third party.

This firm does not have customer accounts, funds, or securities maintained by a third party.

Control Persons/Financing

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

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



Firm Operations

Organization Affiliates

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

This firm is not, directly or indirectly:

- in control of
 - controlled by
 - or under common control with
- the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.**

This firm is 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

RIGGS BANK N.A. is a National Bank and controls the firm.

Business Address: 1503 PENNSYLVANIA AVE NW
WASHINGTON, DC 20005

Effective Date: 10/24/1997

Description: J. BUSH & CO., INCORPORATED IS PART OF RIGGS & CO. AND AN AFFILIATE OF RIGGS BANK N.A., BUT IT DOES NOT SELL SECURITIES THROUGH RIGGS OR OTHER BANK BRANCHES.



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	2	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: Firm

Current Status: Final



Allegations:	THE REGISTRANT CONTACTED THE STATE OF NEW JERSEY, DEPT. OF LAWS & PUBLIC SAFETY, DIVISION OF CONSUMER AFFAIRS, BUREAU OF SECURITIES TO APPLY FOR REGISTRATION AND VOLUNTARILY PROVIDE INFORMATION REGARDING ITS PAST ACTIVITIES IN NEW JERSEY. THE REGISTRANT WAS REGISTERED AS A BROKER-DEALER ON MAY 15, 1991, AND SINCE THAT TIME HAD ALSO ENGAGED AS AN INVESTMENT ADVISOR FOR CERTAIN NEW JERSEY CLIENTS PURSUANT TO THE EXEMPTION FROM REGISTRATION AS AN INVESTMENT ADVISOR FOR REGISTERED BROKER-DEALERS AT NJSA 49:39(G)(3). THE REGISTRANT PROVIDED THE BUREAU OF SECURITIES WITH INFORMATION THAT IT HAD ACTED AS A BROKER-DEALER AND INVESTMENT ADVISOR FOR CLIENTS IN NEW JERSEY PRIOR TO MAY 15, 1991.
Initiated By:	STATE OF NEW JERSEY
Date Initiated:	05/15/1991
Docket/Case Number:	
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	03/15/1994
Sanctions Ordered:	Monetary/Fine \$15,000.00
Other Sanctions Ordered:	
Sanction Details:	IN MARCH, 1994 THE REGISTRANT AND THE BUREAU OF SECURITIES FINALIZED A CONSENT ORDER RELATING TO THESE ACTIVITIES UNDER WHICH THE REGISTRANT AGREED TO IN THE FUTURE MAINTAIN FULL COMPLIANCE WITH THE LAWS AND REGULATIONS ENFORCED BY THE BUREAU OF SECURITIES, TO PAY A CIVIL PENALTY IN THE AMOUNT OF \$15,000, AND TO PAY BACK REGISTRATION FEES OF \$750.

Disclosure 2 of 4

Reporting Source:	Firm
Current Status:	Final
Allegations:	IN 1990, J. BUSH & CO. CONSIDERED OPENING AN OFFICE IN



CONNECTICUT FROM WHICH TO CONDUCT A PORTION OF ITS INVESTMENT ADVISORY BUSINESS, AND APPLIED TO CONNECTICUT FOR REGISTRATION AS AN INVESTMENT ADVISOR IN THAT STATE. IN REVIEWING THE APPLICATION, THE SECURITIES AND BUSINESS INVESTMENTS DIVISION OF THE CONNECTICUT DEPARTMENT OF BANKING RAISED CERTAIN QUESTIONS ABOUT THE BROKER DEALER AND INVESTMENT ADVISER REGISTRATION REQUIREMENTS OF CONNECTICUT LAW IN CONNECTION WITH PRIOR BUSINESS ACTIVITIES OF THE REGISTRANT IN CONNETICUT.

Initiated By: STATE OF CONNECTICUT

Date Initiated: 01/03/1990

Docket/Case Number:

Principal Product Type: Equity Listed (Common & Preferred Stock)

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Decision

Resolution Date: 01/02/1991

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING ANY VIOLATION OF CONNECTICUT LAW, ON JANUARY 30, 1991 THE REGISTRANT ENTERED INTO A STIPULATION AGREEMENT WITH THE CONNECTICUT DIVISION IN WHICH THE REGISTRANT AGREED TO REVIEW AND MODIFY ITS SUPERVISORY PROCEDURES TO ENSURE FUTURE COMPLIANCE WITH THE CONNECTICUT SECURITIES LAWS AND THE REGULATIONS THEREUNDER, PAY THE CONNECTICUT DIVISION \$1,500 IN REIMBURSEMENT FOR EXAMINATION EXPENSES AND OTHER ADMINISTRATIVE COSTS, PAY THE CONNECTICUT DIVISION \$2,500 IN REGISTRATION FEES, SEND A LETTER TO THE REGISTRANT'S CONNECTICUT CLIENTS NOTIFYING THEM OF THE REGISTRANT'S PREVIOUSLY UNREGISTERED STATUS. THE CONNECTICUT DIVISION GRANTED THE REGISTRANT'S APPLICATIONS FOR REGISTRATION AS A BROKER-DEALER AND INVESTMENT ADVISOR IN CONNECTICUT ON JANUARY 2, 1991.

**Disclosure 3 of 4**

Reporting Source:	Regulator
Current Status:	Final
Allegations:	J. BUSH & CO., INCORPORATED HAS FILED WITH THE MASSACHUSETTS SECURITIES DIVISION AN APPLICATION FOR REGISTRATION AS A BROKER-DEALER IN MASSACHUSETTS. THROUGH IN ITS INITIAL FILING DATED FERUARY 11, 1991 AND LETTERS DATED MARCH 15, 1991, APRIL 15, 1991, MAY 13, 1991, JULY 12, 1991 AND ATTACHMENTS, J. BUSH DISCLOSED THAT IT HAD ENGAGED IN APPROXIMATELY EIGHT HUNDRED AND EIGHTY NON-EXEMPT TRANSACTIONS IN SECURITIES WITH NON-INSTITUTIONAL CUSTOMERS IN MASSACHUSETTS DURING THE PERIOD FROM JANUARY 1, 1988 TO THE PRESENT. J. BUSH HAS NEVER BEEN REGISTERED AS A BROKER-DEALER IN MASS.
Initiated By:	MASSACHUSETTS SECURITIES DIVISION
Date Initiated:	07/25/1991
Docket/Case Number:	91-039-E
URL for Regulatory Action:	
Principal Product Type:	
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	07/25/1991
Sanctions Ordered:	Monetary/Fine \$30,000.00
Other Sanctions Ordered:	
Sanction Details:	THE MASSACHUSETTS SECURITIES DIVISION ISSUED AN ORDER APPROVING REGISTRATION UPON CONDITIONS, DOCKET NO. 91-039-E ON JULY 25, 1991.
Regulator Statement	THE MASSACHUSETTS SECURITIES DIVISION ISSUED AN ORDER AGAINST J. BUSH & CO., INC. APPROVING REGISTRATION UPON CONDITIONS ON JULY 25, 1991. THE ORDER STATES THAT J. BUSH SHALL COMPLY WITH THE STATUTES AND REGULATIONS RELATING TO



THE
TRANSACTION OF BUSINESS IN SECURITIES IN MASS. J. BUSH SHALL
IMPLEMENT AND MAINTAIN PROCEDURES APPROPRIATELY DESIGNED TO
ENSURE COMPLIANCE WITH SECTION 201 OF M.G.L. C.110A. J. BUSH
SHALL PROVIDE THE DIVISION WITH A COPY OF EACH OFFER OF
RESCISSION IT HAS MADE PURSUANT TO THE UNDERTAKING AND WITH A
COPY OF THE WRITTEN RESPONSE TO EACH SUCH OFFER. J. BUSH
SHALL
PAY TO THE COMMONWEALTH OF MASSACHUSETTS AN ADMINISTRATIVE
FINE
IN THE AMOUNT OF \$30,000. FOR A PERIOD OF ONE YEAR FROM THE
DATE OF ENTRY OF THE ORDER APPROVING ITS CONDITIONAL
REGISTRATION AS A BROKER-DEALER IN MASSACHUSETTS, THE
TRANSACTION OF BUSINESS IN SECURITIES BY J. BUSH & CO. IN
MASSACHUSETTS SHALL BE LIMITED TO TRANSACTIONS WITH PERSONS
WHO
HAD BEEN CUSTOMERS OF THE FIRM PRIOR TO THAT DATE; AND TO
PERSONS WHO MEET THE REQUIREMENTS DEFINED IN 17 CFR SECTION
230.501 (REGULATION D) FOR ACCREDITED INVESTORS.

Reporting Source: Firm

Current Status: Final

Allegations: J. BUSH & CO. INCORPORATED HAD FILED WITH THE MASSACHUSETTS SECURITIES DIVISION AN APPLICATION FOR REGISTRATION AS A BROKER-DEALER IN MASSACHUSETTS. THROUGH ITS INITIAL FILING DATED FEB. 11, 1991 AND LETTERS DATED MARCH 15, APRIL 15, MAY 13 AND JULY 12, 1991 AND ATTACHMENTS, J. BUSH DISCLOSED THAT IT HAD ENGAGED IN APPROXIMATELY 880 NON-EXEMPT TRANSACTIONS WITH NON-INSTITUTIONAL CUSTOMERS IN MASSACHUSETTS DURING THE PERIOD FROM JANUARY 1, 1988 TO THE PRESENT. J. BUSH HAD NEVER BEEN REGISTERED AS A BROKER-DEALER IN MASSACHUSETTS.

Initiated By: MASSACHUSETTS SECURITIES DIVISION

Date Initiated: 07/23/1991

Docket/Case Number: 91-039-E

Principal Product Type: Equity Listed (Common & Preferred Stock)

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

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

Resolution: Decision

Resolution Date: 07/25/1991

Sanctions Ordered: Monetary/Fine \$30,000.00

Other Sanctions Ordered:

Sanction Details:

THE MASSACHUSETTS SECURITIES DIVISION ISSUED AN ORDER AGAINST J. BUSH & CO., INC. APPROVING REGISTRATION UPON CONDITIONS ON JULY 25, 1991. THE ORDER STATES THAT J. BUSH SHALL COMPLY WITH THE STATUTES AND REGULATIONS RELATING TO THE TRANSACTION OF BUSINESS IN SECURITIES IN MASS. J. BUSH SHALL IMPLEMENT AND MAINTAIN PROCEDURES APPROPRIATELY DESIGNED TO ENSURE COMPLIANCE WITH SECTION 201 OF M.G.L.C.110A. J. BUSH SHALL PROVIDE THE DIVISION WITH A COPY OF EACH OFFER OF RECISSION IT HAS MADE PURSUANT TO THE UNDERTAKING AND WITH A COPY OF THE WRITTEN RESPONSE TO EACH SUCH OFFER. J. BUSH SHALL PAY TO THE COMMONWEALTH OF MASSACHUSETTS AN ADMINISTRATIVE FINE IN THE AMOUNT OF \$30,000. FOR A PERIOD OF ONE YEAR FROM THE DATE OF THE ENTRY OF THE ORDER APPROVING ITS CONDITIONAL REGISTRATION AS A BROKER-DEALER IN MASSACHUSETTS, THE TRANSACTION OF BUSINESS IN SECURITIES BY J. BUSH & CO. IN MASSACHUSETTS SHALL BE LIMITED TO TRANSACTIONS WITH PERSONS WHO HAD BEEN CUSTOMERS OF THE FIRM PRIOR TO THAT DATE; AND TO PERSONS WHO MEET THE REQUIREMENTS DEFINED IN 17 CFR SECTION 230.501 (REGULATION D) FOR ACCREDITED INVESTORS.

Disclosure 4 of 4

Reporting Source: Regulator

Current Status: Final

Allegations:

Initiated By: AMERICAN STOCK EXCHANGE

Date Initiated: 04/19/1984

Docket/Case Number:

Principal Product Type:

Other Product Type(s):



Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Decision
Resolution Date: 04/19/1984
Sanctions Ordered: Monetary/Fine \$5,000.00
Other Sanctions Ordered:

Sanction Details:

Regulator Statement AMERICAN STOCK EXCHANGE EXAMINATION OF APPLICANT J. BUSH & CO., INCORPORATED FOR ALLEGED VIOLATIONS OF EXCHANGE RULE 920, PROHIBITING ENGAGING IN A PUBLIC OPTIONS BUSINESS, WITHOUT HAVING QUALIFIED AS A REGISTERED OPTIONS PRINCIPAL, AND EXCHANGE RULE 921(b),(c) AND (d) AND THE ACCOMPANYING COMMENTARY FOR PERMITTING PUBLIC CUSTOMERS TO TRADE OPTIONS WITHOUT OBTAINING REQUIRED INFORMATION ABOUT THE CUSTOMERS. APPLICANT PAID A \$5,000 FINE WITHOUT ADMITTING OR DENYING THE ALLEGATIONS.

Reporting Source: Firm
Current Status: Final
Allegations: AMERICAN STOCK EXCHANGE EXAMINATION OF J. BUSH & CO, INCORPORATED FOR ALLEGED VIOLATIONS OF EXCHANGE RULE 920, PROHIBITING ENGAGING IN PUBLIC OPTION BUSINESS WITHOUT HAVING QUALIFIED AS A REGISTERED OPTIONS PRINCIPAL
Initiated By: AMERICAN STOCK EXCHANGE
Date Initiated: 04/19/1984
Docket/Case Number:
Principal Product Type: Options
Other Product Type(s):
Principal Sanction(s)/Relief Sought:

**Other Sanction(s)/Relief Sought:****Resolution:** Decision**Resolution Date:** 04/19/1984**Sanctions Ordered:** Monetary/Fine \$5,000.00**Other Sanctions Ordered:****Sanction Details:** APPLICANT PAID A \$5,000 FINE WITHOUT ADMITTING OR DENYING ALLEGATIONS.**Firm Statement** AMERICAN STOCK EXCHANGE EXAMINATION OF APPLICANT J. BUSH & CO. INCORPORATED FOR ALLEGED VIOLATIONS OF EXCHANGE RULE 920, PROHIBITING ENGAGING IN A PUBLIC OPTIONS BUSINESS, WITHOUT HAVING QUALIFIED AS A REGISTERED OPTIONS PRINCIPAL, AND EXCHANGE RULE 921(B),(C) AND (D) AND THE ACCOMPANYING COMMENTARY FOR PERMITTING PUBLIC CUSTOMERS TO TRADE OPTIONS WITHOUT OBTAINING REQUIRED INFORMATION ABOUT THE CUSTOMERS. APPLICANT PAID A \$5,000 FINE WITHOUT ADMITTING OR DENYING THE ALLEGATIONS.



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 2

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:	12/02/2003
Case Number:	03-08459
Disputed Product Type:	COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE
Sum of All Relief Requested:	\$2,000,000.00
Disposition:	AWARD AGAINST PARTY
Disposition Date:	01/04/2005
Sum of All Relief Awarded:	\$630,000.00

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

Disclosure 2 of 2

Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-OTHER; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-NEGLIGENCE
Arbitration Forum:	NASD
Case Initiated:	05/15/2007
Case Number:	07-01012



Disputed Product Type: NO OTHER TYPE OF SEC INVOLVE; UNKNOWN TYPE OF SECURITIES

Sum of All Relief Requested: \$600,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 12/14/2009

Sum of All Relief Awarded: \$300,000.00

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

End of Report



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