

BrokerCheck Report

RAYMOND JAMES FINANCIAL SERVICES, INC.

CRD# 6694

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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.



RAYMOND JAMES FINANCIAL SERVICES, INC.

CRD# 6694

SEC# 8-17983

Main Office Location

880 CARILLON PARKWAY
ST. PETERSBURG, FL 33716
Regulated by FINRA Florida Office

Mailing Address

880 CARILLON PARKWAY
ST. PETERSBURG, FL 33716

Business Telephone Number

727-567-1000

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 Florida on 09/12/1973.

Its fiscal year ends in September.

Firm History

Information relating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

Firm Operations

This firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 53 U.S. states and territories

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

This firm conducts 14 types of businesses.

This firm is affiliated with financial or investment institutions.

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

Disclosure Events

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

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

The following types of disclosures have been reported:

Type	Count
Regulatory Event	128
Arbitration	76

The number of disclosures from non-registered control affiliates is 1



Firm Profile

This firm is classified as a corporation.

This firm was formed in Florida on 09/12/1973.

Its fiscal year ends in September.

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.

RAYMOND JAMES FINANCIAL SERVICES, INC.

Doing business as RAYMOND JAMES FINANCIAL SERVICES, INC.

CRD# 6694

SEC# 8-17983

Main Office Location

880 CARILLON PARKWAY
ST. PETERSBURG, FL 33716

Regulated by FINRA Florida Office

Mailing Address

880 CARILLON PARKWAY
ST. PETERSBURG, FL 33716

Business Telephone Number

727-567-1000



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): RAYMOND JAMES FINANCIAL, INC.

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

Position OWNER

Position Start Date 09/1973

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): BARKO, SHAWN JOSEPH

2690394

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

Position CHIEF COMPLIANCE OFFICER

Position Start Date 12/2025

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): CURTIS, SCOTT

1707935

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

Position DIRECTOR

Position Start Date 10/2024

Firm Profile



Direct Owners and Executive Officers (continued)

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): ELWYN, TASHTEGO SPRING
2319098

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

Position DIRECTOR

Position Start Date 08/2022

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): GEIS, WILLIAM CHRISTIAN
2171250

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

Position DIRECTOR

Position Start Date 04/2014

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): GRIGAS CALIGIURI, KARA

Firm Profile



Direct Owners and Executive Officers (continued)

	2146027
Is this a domestic or foreign entity or an individual?	Individual
Position	PRINCIPAL FINANCIAL OFFICER, FINOP
Position Start Date	03/2025
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
<hr/>	
Legal Name & CRD# (if any):	KRUCHTEN, STEPHEN EDWARD 1645287
Is this a domestic or foreign entity or an individual?	Individual
Position	DIRECTOR
Position Start Date	02/2024
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
<hr/>	
Legal Name & CRD# (if any):	REID, SHANNON BELVEAL 4815189
Is this a domestic or foreign entity or an individual?	Individual
Position	PRESIDENT, CHIEF EXECUTIVE OFFICER, DIRECTOR
Position Start Date	10/2024
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): RUST, KEITH G
5915636

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

Position PRINCIPAL OPERATIONS OFFICER

Position Start Date 10/2021

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): SANTELLI, JONATHAN
6306997

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

Position GENERAL COUNSEL

Position Start Date 07/2016

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? No

Is this a public reporting company? No

Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.

Indirect Owners

No information reported.



Firm History

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

No information reported.





Firm Operations

Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is currently registered with the SEC, 1 SRO and 53 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	05/16/1974

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

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

A government securities broker or dealer only: No

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

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	05/30/1974



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	10/23/1981
Alaska	Approved	12/08/1977
Arizona	Approved	06/24/1977
Arkansas	Approved	09/20/1978
California	Approved	09/02/1977
Colorado	Approved	02/01/1983
Connecticut	Approved	07/07/1978
Delaware	Approved	10/06/1981
District of Columbia	Approved	12/12/1979
Florida	Approved	04/27/1983
Georgia	Approved	09/21/1981
Hawaii	Approved	06/25/1984
Idaho	Approved	01/01/1982
Illinois	Approved	03/05/1976
Indiana	Approved	10/20/1981
Iowa	Approved	07/14/1983
Kansas	Approved	08/11/1978
Kentucky	Approved	07/16/1982
Louisiana	Approved	04/20/1983
Maine	Approved	02/22/1984
Maryland	Approved	10/03/1981
Massachusetts	Approved	07/31/1981
Michigan	Approved	02/02/1983
Minnesota	Approved	07/15/1982
Mississippi	Approved	10/14/1981
Missouri	Approved	07/18/1983
Montana	Approved	04/20/1983
Nebraska	Approved	10/08/1981
Nevada	Approved	07/15/1983
New Hampshire	Approved	02/02/1983
New Jersey	Approved	07/13/1983
New Mexico	Approved	07/21/1983
New York	Approved	04/26/1983

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	07/15/1982
North Dakota	Approved	10/21/1981
Ohio	Approved	07/16/1982
Oklahoma	Approved	07/17/1982
Oregon	Approved	09/21/1982
Pennsylvania	Approved	07/16/1975
Puerto Rico	Approved	01/16/1998
Rhode Island	Approved	02/01/1983
South Carolina	Approved	10/28/1981
South Dakota	Approved	07/15/1982
Tennessee	Approved	08/17/1981
Texas	Approved	07/25/1983
Utah	Approved	04/21/1983
Vermont	Approved	02/13/1984
Virgin Islands	Approved	04/06/2005
Virginia	Approved	09/22/1981
Washington	Approved	04/20/1983
West Virginia	Approved	04/12/1982
Wisconsin	Approved	08/30/1976
Wyoming	Approved	07/22/1983



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 14 types of businesses.

Types of Business

Broker or dealer retailing corporate equity securities over-the-counter
Broker or dealer selling corporate debt securities
Underwriter or selling group participant (corporate securities other than mutual funds)
Mutual fund retailer
U S. government securities broker
Municipal securities broker
Broker or dealer selling variable life insurance or annuities
Solicitor of time deposits in a financial institution
Broker or dealer selling securities of non-profit organizations (e.g., churches, hospitals)
Broker or dealer selling tax shelters or limited partnerships in primary distributions
Non-exchange member arranging for transactions in listed securities by exchange member
Private placements of securities
Broker or dealer involved in a networking, kiosk or similar arrangement with a: bank, savings bank or association, or credit union
Broker or dealer involved in a networking, kiosk or similar arrangement with a: insurance company or agency

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: TO COMPLY WITH SWAP REGISTRATION REQUIREMENTS ASSOCIATED WITH DODD FRANK, RAYMOND JAMES FINANCIAL SERVICES, INC WAS APPROVED AS A SWAP FIRM ON 06/25/2020.

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:	RAYMOND JAMES & ASSOCIATES, INC.
CRD #:	705
Business Address:	880 CARILLON PARKWAY ST. PETERSBURG, FL 33716
Effective Date:	09/12/1973
Description:	RAYMOND JAMES FINANCIAL SERVICES, INC. INTRODUCES ITS CLIENTS TO RAYMOND JAMES & ASSOCIATES, INC. ON A FULLY DISCLOSED BASIS.

Firm Operations

Industry Arrangements



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

Name: RAYMOND JAMES & ASSOCIATES, INC.
CRD #: 705
Business Address: 880 CARILLON PARKWAY
ST. PETERSBURG, FL 33716
Effective Date: 09/12/1973
Description: RAYMOND JAMES FINANCIAL SERVICES, INC. INTRODUCES IT CLIENTS TO RAYMOND JAMES & ASSOCIATES ON A FULLY DISCLOSED BASIS.

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

Name: RAYMOND JAMES & ASSOCIATES, INC.
CRD #: 705
Business Address: 880 CARILLON PARKWAY
ST. PETERSBURG, FL 33716
Effective Date: 09/12/1973
Description: RAYMOND JAMES FINANCIAL SERVICES, INC. INTRODUCES ITS CLIENTS TO RAYMOND JAMES & ASSOCIATES, INC. ON A FULLY DISCLOSED BASIS.

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

Name: RAYMOND JAMES & ASSOCIATES, INC.
CRD #: 705
Business Address: 880 CARILLON PARKWAY
ST. PETERSBURG, FL 33716
Effective Date: 09/12/1973
Description: RAYMOND JAMES FINANCIAL SERVICES, INC. INTRODUCES ITS CLIENTS TO RAYMOND JAMES & ASSOCIATES, INC. ON A FULLY DISCLOSED BASIS.

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.

CHARTWELL INVESTMENT PARTNERS, LLC is under common control with the firm.

CRD #:	170335
Business Address:	1205 WESTLAKES DRIVE SUITE 100 BERWYN, PA 19312
Effective Date:	06/01/2022
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	WHOLLY-OWNED SUBSIDIARY OF THE PARENT OF APPLICANT.

SUMRIDGE PARTNERS, LLC is under common control with the firm.

CRD #:	152437
Business Address:	111 TOWN SQUARE PLACE JERSEY CITY, NJ 07310
Effective Date:	07/01/2022
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	BOTH APPLICANT AND SUMRIDGE PARTNERS, LLC ARE WHOLLY OWNED SUBSIDIARIES OF RAYMOND JAMES FINANCIAL CORPORATION.

Firm Operations



Organization Affiliates (continued)

SCOUT INVESTMENTS, INC. is controlled by the firm.

CRD #:	111787
Business Address:	1201 WALNUT ST 21ST FLOOR KANSAS CITY, MO 64106
Effective Date:	11/17/2017
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	INDIRECT WHOLLY-OWNED SUBSIDIARY OF THE PARENT OF APPLICANT

EB MANAGEMENT I LLC is under common control with the firm.

Business Address:	880 CARILLON PARKWAY ST. PETERSBURG, FL 33716
Effective Date:	12/27/2001
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	MAJORITY-OWNED SUBSIDIARY OF EAGLE ASSET MANAGEMENT, INC., WHICH IS A WHOLLY-OWNED SUBSIDIARY OF CARILLON TOWER ADVISERS, INC., WHICH IS A WHOLLY-OWNED SUBSIDIARY OF THE PARENT OF APPLICANT.

RAYMOND JAMES ASSET MANAGEMENT INTERNATIONAL, S.A. is under common control with the firm.

Business Address:	40, RUE LA BOETIE PARIS, FRANCE 75008
Effective Date:	06/07/1994
Foreign Entity:	Yes
Country:	FRANCE
Securities Activities:	Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: MAJORITY-OWNED SUBSIDIARY OF RAYMOND JAMES INTERNATIONAL HOLDINGS, INC., WHICH IS A WHOLLY-OWNED SUBSIDIARY OF THE PARENT OF APPLICANT

RAYMOND JAMES CORPORATE FINANCE GMBH is under common control with the firm.

Business Address: THERESIENSTRASSE 1
MUNICH, GERMANY 80333

Effective Date: 05/31/2016

Foreign Entity: Yes

Country: GERMANY

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: WHOLLY-OWNED SUBSIDIARY OF RAYMOND JAMES GLOBAL HOLDINGS LIMITED, WHICH IS A WHOLLY-OWNED SUBSIDIARY OF RAYMOND JAMES INTERNATIONAL HOLDINGS, INC., WHICH IS A WHOLLY-OWNED SUBSIDIARY OF THE PARENT OF APPLICANT.

RAYMOND JAMES INVESTMENT SERVICES LTD is under common control with the firm.

Business Address: 77 CORNHILL
LONDON, ENGLAND EC3V 3QQ

Effective Date: 09/16/2002

Foreign Entity: Yes

Country: ENGLAND

Securities Activities: Yes

Investment Advisory Activities: No

Description: WHOLLY-OWNED SUBSIDIARY OF THE PARENT OF APPLICANT

RAYMOND JAMES TRUST, NATIONAL ASSOCIATION is under common control with the firm.

Business Address: 880 CARILLON PARKWAY
ST PETERSBURG, FL 33716

Firm Operations



Organization Affiliates (continued)

Effective Date: 05/28/1992

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: RAYMOND JAMES TRUST, NATIONAL ASSOCIATION FORMERLY KNOWN AS RAYMOND JAMES TRUST COMPANY IS A WHOLLY-OWNED SUBSIDIARY OF THE PARENT OF APPLICANT

CARILLON FUND DISTRIBUTORS, INC. is under common control with the firm.

Business Address: 880 CARILLON PARKWAY
ST PETERSBURG, FL 33716

Effective Date: 07/13/2006

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: WHOLLY-OWNED SUBSIDIARY OF EAGLE ASSET MANAGEMENT, INC., WHICH IS A WHOLLY-OWNED SUBSIDIARY OF CARILLON TOWER ADVISORS, INC., WHICH IS A WHOLLY-OWNED SUBSIDIARY OF THE PARENT OF APPLICANT

RAYMOND JAMES LTD. (CANADA) is under common control with the firm.

Business Address: 601 WEST HASTINGS ST, SUITE 800
VANCOUVER, B.C., CANADA V6B 5E2

Effective Date: 04/01/1998

Foreign Entity: Yes

Country: CANADA

Securities Activities: Yes

Investment Advisory Activities: No

Description: WHOLLY-OWNED SUBSIDIARY OF RAYMOND JAMES CANADA, LLC, WHICH

Firm Operations



Organization Affiliates (continued)

IS A WHOLLY-OWNED SUBSIDIARY OF THE PARENT OF APPLICANT

CARILLON TOWER ADVISERS, INC. is under common control with the firm.

CRD #: 174904

Business Address: 880 CARILLON PARKWAY
ST. PETERSBURGH, FL 33716

Effective Date: 07/06/2015

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: CARILLON TOWERS ADVISERS, INC AND RAYMOND JAMES FINANCIAL SERVICES, INC ARE SUBSIDIARIES OF RAYMOND JAMES FINANCIAL THE HOLDING COMPANY.

CLARIVEST ASSET MANAGEMENT LLC is under common control with the firm.

CRD #: 139785

Business Address: 3611 VALLEY CENTRE DRIVE
SUITE 100
SAN DIEGO, CA 92130

Effective Date: 12/24/2012

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: AFFILIATE OF EAGLE ASSET MANAGEMENT, INC., WHICH IS A WHOLLY-OWNED SUBSIDIARY OF CARILLON TOWER ADVISORS, INC., WHICH IS A WHOLLY-OWNED SUBSIDIARY OF THE PARENT OF APPLICANT.

COUGAR GLOBAL INVESTMENTS LTD is under common control with the firm.

Business Address: 357 BAY STREET, #101
TORONTO, ON, CANADA M5H 2T7

Firm Operations



Organization Affiliates (continued)

Effective Date: 04/30/2015

Foreign Entity: Yes

Country: TORONTO, CANADA

Securities Activities: No

Investment Advisory Activities: Yes

Description: COUGAR GLOBAL INVESTMENTS LTD. IS A WHOLLY OWNED SUBSIDIARY OF RAYMOND JAMES FINANCIAL, INC AND A SUB-ADVISER OF EAGLE ASSET MANAGEMENT, INC

RAYMOND JAMES FINANCIAL SERVICES ADVISORS, INC is under common control with the firm.

CRD #: 149018

Business Address: 880 CARILLON PARKWAY
ST. PETERSBURG, FL 33716

Effective Date: 12/18/2008

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: WHOLLY-OWNED SUBSIDIARY OF THE PARENT OF APPLICANT.

RAYMOND JAMES (USA) LTD. is under common control with the firm.

CRD #: 25853

Business Address: 40 KING STREET WEST, SUITE 5300
TORONTO ONTARIO, CANADA M5H3Y2

Effective Date: 11/09/2001

Foreign Entity: Yes

Country: CANADA

Securities Activities: Yes

Investment Advisory Activities: Yes

Firm Operations



Organization Affiliates (continued)

Description: WHOLLY-OWNED SUBSIDIARY OF RAYMOND JAMES LTD., WHICH IS A WHOLLY-OWNED SUBSIDIARY OF RAYMOND JAMES CANADA, LLC, WHICH IS A WHOLLY-OWNED SUBSIDIARY OF THE PARENT OF APPLICANT.

EAGLE ASSET MANAGEMENT INC is under common control with the firm.

CRD #: 110653

Business Address: 880 CARILLON PARKWAY
ST. PETERSBURG, FL 33716

Effective Date: 02/08/1997

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: WHOLLY-OWNED SUBSIDIARY OF CARILLON TOWER ADVISORS, INC., WHICH IS A WHOLLY-OWNED SUBSIDIARY OF THE PARENT OF APPLICANT.

RAYMOND JAMES FINANCIAL INTERNATIONAL, LTD. (UK) is under common control with the firm.

Business Address: BISHOPSGATE COURT
4-12 NORTON FOLGATE
LONDON, ENGLAND E16DB

Effective Date: 11/16/1995

Foreign Entity: No

Country: LONDON, ENGLAND

Securities Activities: Yes

Investment Advisory Activities: No

Description: RAYMOND JAMES FINANCIAL INTERNATIONAL, LTD. (RJFI) IS A BROKER DEALER HEAD QUARTERED IN LONDON, AND PROVIDING BROKERAGE SERVICES TO NON-U.S. INSTITUTIONAL CLIENTS. RJFI IS 100% OWNED BY RAYMOND JAMES INTERNATIONAL HOLDINGS, INC.(RJIH). RJIH A HOLDING COMPANY (A WHOLLY OWNED SUBSIDIARY OF RAYMOND JAMES FINANCIAL, INC)

RAYMOND JAMES & ASSOCIATES, INC. is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

CRD #:	705
Business Address:	880 CARILLON PARKWAY ST. PETERSBURG, FL 33716
Effective Date:	09/12/1973
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	BOTH APPLICANT AND RAYMOND JAMES & ASSOCIATES, INC. ARE WHOLLY OWNED SUBSIDIARIES OF RAYMOND JAMES FINANCIAL CORPORATION.

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

TRISTATE CAPITAL BANK is a Bank Holding Company and controls the firm.

Business Address:	301 GRANT ST SUITE 2700 PITTSBURGH, PA 15219
Effective Date:	06/01/2022
Description:	WHOLLY-OWNED SUBSIDIARY OF THE PARENT OF APPLICANT.

RAYMOND JAMES FINANCIAL, INC is a Bank Holding Company and controls the firm.

Business Address:	880 CARILLON PARKWAY ST. PETERSBURG, FL 33716
Effective Date:	02/01/2012
Description:	PARENT OF APPLICANT



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	128	0
Arbitration	N/A	76	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 128

Reporting Source: Regulator

Current Status: Final



Allegations: THE DIVISION ALLEGED RULE VIOLATIONS UNDER THE VA SEC. ACT; 21 VAC 5-20-260 D AND 21 VAC 5-20-280 A9. NEITHER ADMIT NOR DENY UNREASONABLE COMMISSIONS ON THOUSANDS OF LOW-PRINCIPAL EQUITY TRANSACTIONS OVER A PERIOD OF 5 YEARS.

Initiated By: VIRGINIA STATE CORPORATION COMMISSION

Date Initiated: 09/26/2025

Docket/Case Number: SEC-2024-00004

URL for Regulatory Action: [HTTPS://WWW.SCC.VIRGINIA.GOV/DOCKETSEARCH#/CASEDETAILS/144882](https://www.scc.virginia.gov/docketsearch#/casedetails/144882)

Principal Product Type: Other

Other Product Type(s): COMMON STOCK

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: ALONG WITH RAYMOND JAMES & ASSOCIATES, INC., FIRM AGREED TO \$246,564.98 RESTITUTION TO CUSTOMERS IN VIRGINIA, A \$75,000 PENALTY, AND TO CHANGE POLICIES AND PROCEDURES TO ENSURE COMMISSIONS ARE FAIR AND REASONABLE.

Resolution: Dismissed

Resolution Date: 11/12/2025

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 \$75,000.00
Disgorgement/Restitution

Other Sanctions Ordered:

Sanction Details: ALONG WITH RAYMOND JAMES & ASSOCIATES, INC., FIRM AGREED TO \$246,564.98 RESTITUTION TO CUSTOMERS IN VIRGINIA, A \$75,000 PENALTY, AND TO CHANGE POLICIES AND PROCEDURES TO ENSURE COMMISSIONS ARE FAIR AND REASONABLE.

Regulator Statement THE FIRM COMPLIED WITH ALL TERMS, THE MATTER WAS DISMISSED

REGULATOR CONTACT: JOHN HARRINGTON
REGULATOR PHONE NUMBER: (804) 371 - 1547



Reporting Source:	Firm
Current Status:	Final
Allegations:	THE COMMONWEALTH OF VIRGINIA STATE CORPORATION COMMISSION (COMMISSION) ALLEGED RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. (COLLECTIVELY, THE RESPONDENTS) CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	COMMONWEALTH OF VIRGINIA STATE CORPORATION COMMISSION
Date Initiated:	09/29/2025
Docket/Case Number:	SEC-2024-00004
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST, RESTITUTION, UNDERTAKING
Resolution:	Order
Resolution Date:	09/29/2025
Sanctions Ordered:	Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO VIRGINIA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN VIRGINIA CUSTOMERS IN AN AMOUNT NO LESS THAN \$216,401.88. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT NO LESS THAN \$8,383,167.46.
Firm Statement	THE FIRM NEITHER ADMITTED NOR DENIED THE FACTS, ALLEGATIONS OR VIOLATIONS OF 21 VAC 5-20-260D AND 21 VAC 5-20-280 A9.



Disclosure 2 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	THE STATE ALLEGED RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	ARIZONA CORPORATION COMMISSION
Date Initiated:	12/17/2024
Docket/Case Number:	S-21333A-24-0245
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	12/17/2024
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO ARIZONA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN ARIZONA CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$136,168.02. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	THE FIRM NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF A.R.S. § 44-L96L (A)(3).

Disclosure 3 of 128**Reporting Source:** Regulator**Current Status:** Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRMS CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT THEY HAVE FAILED TO REASONABLY SUPERVISE THE FIRMS' REPORTING, AND TIMELY REPORTING, OF CUSTOMER COMPLAINTS VIA FINRA RULE 4530 FILINGS AND AMENDMENTS TO REGISTERED REPRESENTATIVES' FORMS U4 AND U5. THE FINDINGS STATED THAT THE THE FIRMS HAVE NOT TAKEN REASONABLE STEPS TO ENSURE THAT FIRM PERSONNEL MANUALLY ENTER INTO THE FIRMS' ELECTRONIC SYSTEM CERTAIN DATA REQUIRED TO MAKE QUARTERLY FINRA RULE 4530 FILINGS. THE FIRMS ALSO HAVE NOT ESTABLISHED REASONABLE CONTROLS TO ENSURE THAT ASSOCIATED PERSONS TIMELY NOTIFY APPROPRIATE FIRM PERSONNEL OF CUSTOMER COMPLAINTS. IN PARTICULAR, THE FIRMS FAILED IN MANY INSTANCES TO PROMPTLY RESEARCH COMPLAINTS AND RELAY DETERMINATIONS ABOUT THE REPORTABILITY OF CUSTOMER COMPLAINTS TO PERSONNEL WHO WERE RESPONSIBLE FOR MAKING FORM U4 AND U5 AMENDMENTS. MOREOVER, THE FIRMS FAILED TO TAKE REASONABLE STEPS TO SUPERVISE REGISTERED REPRESENTATIVES' PROMPT TRANSMISSION OF CERTAIN CUSTOMER COMPLAINTS TO SUPERVISORS, AND SUPERVISORS' PROMPT TRANSMISSION OF CERTAIN CUSTOMER COMPLAINTS TO PERSONNEL RESPONSIBLE FOR DETERMINING THE REPORTABILITY OF CUSTOMER COMPLAINTS. THE FINDINGS ALSO STATED THAT THE FIRMS FAILED TO REASONABLY SUPERVISE AT LEAST 4.7 MILLION MUTUAL FUND PURCHASES THAT THE FIRMS' REPRESENTATIVES MADE DIRECTLY WITH MUTUAL FUND COMPANIES ON BEHALF OF FIRM CUSTOMERS. THE FIRMS INADVERTENTLY EMPLOYED A DATA FILTER THAT BLOCKED OVER A MILLION PURCHASES THAT WERE MADE PURSUANT TO PERIODIC INVESTMENT PLANS FROM BEING INGESTED INTO ITS AUTOMATED SURVEILLANCE SYSTEM. UPON DISCOVERING THE DATA FILTER DURING AN UNRELATED REVIEW OF AUTOMATED SURVEILLANCE SYSTEMS, THE FIRMS DEACTIVATED IT. IN ADDITION, THE FIRMS FAILED TO REVIEW THROUGH ITS AUTOMATED SURVEILLANCE SYSTEM OVER A MILLION DIRECT BUSINESS TRANSACTIONS THAT REGISTERED REPRESENTATIVES FAILED TO TIMELY MATCH TO A FIRM ACCOUNT. IF A TRANSACTION REMAINED UNMATCHED AFTER A PERIOD OF TIME, THE FIRMS' AUTOMATED SURVEILLANCE SYSTEM DID NOT REVIEW IT. THE FIRMS FAILED TO INGEST MANY TRANSACTIONS INTO THEIR AUTOMATED SURVEILLANCE SYSTEMS AND HAD NOT CONFIGURED THEIR SYSTEMS TO REVIEW MANY OTHER TRANSACTIONS. THE FIRMS FAILED TO CONFIGURE



THEIR AUTOMATED SURVEILLANCE SYSTEMS TO REVIEW CERTAIN TYPES OF DIRECT BUSINESS TRANSACTIONS. THE FIRMS CONDUCTED A COMPREHENSIVE RETROSPECTIVE REVIEW OF DIRECT BUSINESS TRANSACTIONS THAT THEY FAILED TO SUPERVISE AND DETERMINED THAT CUSTOMERS INCURRED APPROXIMATELY \$111,724 IN EXCESSIVE SALES CHARGES AND COMMISSIONS IN CONNECTION WITH THESE TRANSACTIONS.

Initiated By: FINRA

Date Initiated: 08/29/2024

Docket/Case Number: [2018059564801](#)

Principal Product Type: Mutual Fund(s)

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 08/29/2024

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 \$1,300,000.00
Disgorgement/Restitution

Other Sanctions Ordered: UNDERTAKINGS

Sanction Details: THE FIRM WAS CENSURED, FINED \$1,300,000, ORDERED TO PAY \$85,554.94, PLUS INTEREST, IN RESTITUTION TO ELIGIBLE CUSTOMERS, AND REQUIRED TO CERTIFY THAT THEY HAVE REMEDIATED THE ISSUES IDENTIFIED IN THE AWC AND IMPLEMENTED A REASONABLY DESIGNED SUPERVISORY SYSTEM, INCLUDING WSPS. FINE PAID IN FULL ON SEPTEMBER 17, 2024.

Reporting Source: Firm



Current Status:	Final
Allegations:	<p>WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRMS CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT THEY HAVE FAILED TO REASONABLY SUPERVISE THE FIRMS' REPORTING, AND TIMELY REPORTING, OF CUSTOMER COMPLAINTS VIA FINRA RULE 4530 FILINGS AND AMENDMENTS TO REGISTERED REPRESENTATIVES' FORMS U4 AND U5. THE FINDINGS ALSO STATED THAT THE FIRMS FAILED TO REASONABLY SUPERVISE AT LEAST 4.7 MILLION MUTUAL FUND PURCHASES MADE DIRECTLY WITH MUTUAL FUND COMPANIES ON BEHALF OF FIRM CUSTOMERS. THE FIRMS INADVERTENTLY EMPLOYED A DATA FILTER THAT BLOCKED OVER A MILLION PURCHASES THAT WERE MADE PURSUANT TO PERIODIC INVESTMENT PLANS FROM BEING INGESTED INTO ITS AUTOMATED SURVEILLANCE SYSTEM. UPON DISCOVERING THE DATA FILTER THE FIRMS DEACTIVATED LT. IN ADDITION, THE FIRMS FAILED TO REVIEW THROUGH ITS AUTOMATED SURVEILLANCE SYSTEM OVER A MILLION DIRECT BUSINESS TRANSACTIONS THAT REGISTERED REPRESENTATIVES FAILED TO TIMELY MATCH TO A FIRM ACCOUNT. THE FIRMS CONDUCTED A COMPREHENSIVE RETROSPECTIVE REVIEW OF DIRECT BUSINESS TRANSACTIONS THAT THEY FAILED TO SUPERVISE AND DETERMINED THAT CUSTOMERS INCURRED APPROXIMATELY \$111,724 IN EXCESSIVE SALES CHARGES AND COMMISSIONS IN CONNECTION WITH THESE TRANSACTIONS.</p>
Initiated By:	FINRA
Date Initiated:	08/29/2024
Docket/Case Number:	2018059564801
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	08/29/2024
Sanctions Ordered:	Censure Monetary/Fine \$1,300,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	THE FIRM WAS CENSURED, FINED \$1,300,000, ORDERED TO PAY



\$85,554.94, PLUS INTEREST, IN RESTITUTION TO ELIGIBLE CUSTOMERS, AND CERTIFY THAT THEY HAVE REMEDIATED THE ISSUES IDENTIFIED IN THE AWC.

Disclosure 4 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	THE STATE ALLEGED RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	KANSAS SECURITIES COMMISSIONER
Date Initiated:	06/27/2024
Docket/Case Number:	24E121
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	06/27/2024
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO KANSAS AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO



CERTAIN KANSAS CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$47,189.70. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.

Firm Statement

THE FIRM NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF K.A.R. 81-3-7(A)(4) AND K.S.A. 17-12A412(D)(9).

Disclosure 5 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	RESPONDENTS ALLEGEDLY FAILED TO REASONABLY SUPERVISE FOR UNREASONABLE COMMISSIONS CHARGED ON SECURITIES TRANSACTIONS IN THE ACCOUNTS OF MISSOURI CUSTOMERS, IN VIOLATION OF 15 CSR 30-51.172(2)(A-C).
Initiated By:	MISSOURI
Date Initiated:	05/31/2024
Docket/Case Number:	AP-23-16
URL for Regulatory Action:	HTTPS://WWW.SOS.MO.GOV/CMSIMAGES/SECURITIES/AP-23-16.PDF
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:	MISC. UNDERTAKINGS
Resolution:	Consent
Resolution Date:	05/31/2024
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 \$75,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	MISC. UNDERTAKINGS
Sanction Details:	RESPONDENTS, JOINT AND SEVERAL, SHALL PAY AN ADMINISTRATIVE



FINE, FURTHER COSTS OF INVESTIGATION INCURRED BY THE LEAD STATES AND \$75,000 TO NASAA, TOTALING \$4,200,000. RESPONDENTS SHALL PROVIDE RESTITUTION PLUS INTEREST TO AFFECTED MISSOURI CUSTOMERS IN AN AMOUNT OF \$138,887.37. RESPONDENTS, JOINT AND SEVERAL, SHALL PAY \$75,000 TO THE MISSOURI SECRETARY OF STATE'S INVESTOR EDUCATION AND PROTECTION FUND.

Reporting Source:	Firm
Current Status:	Final
Allegations:	THE STATE ALLEGED RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	MISSOURI SECURITIES DIVISION
Date Initiated:	05/31/2024
Docket/Case Number:	AP-23-16
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	05/31/2024
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF



\$75,000 TO MISSOURI AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN MISSOURI CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$138,887.37. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.

Firm Statement

THE FIRM NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF 15 CSR 30-51.171(2)(A-C).

Disclosure 6 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	NEW MEXICO REGULATION AND LICENSING DEPT.
Date Initiated:	03/29/2024
Docket/Case Number:	MS-23-7-18
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	03/29/2024
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL



SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO NEW MEXICO AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN NEW MEXICO CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$53,951.01. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.

Firm Statement THE FIRM NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF NMSA 1978, § 58-13C-412(C)(9).

Disclosure 7 of 128

Reporting Source: Firm

Current Status: Final

Allegations: RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.

Initiated By: RHODE ISLAND DEPT. OF BUSINESS REGULATION

Date Initiated: 03/06/2024

Docket/Case Number: 2023-SC-004

Principal Product Type: Equity - OTC

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.

Resolution: Consent

Resolution Date: 03/06/2024

Sanctions Ordered: Censure
Monetary/Fine \$75,000.00
Disgorgement/Restitution
Cease and Desist/Injunction

Other Sanctions Ordered: IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.



Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO RHODE ISLAND AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN RHODE ISLAND CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$12,954.52. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	THE FIRM NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF RI GEN. LAWS SEC. 7-11-212O(B)(11).

Disclosure 8 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	THE RESPONDENT FIRMS FAILED REASONABLY TO SUPERVISE THEIR AGENTS AND/OR INVESTMENT ADVISER REPRESENTATIVES, CONSTITUTING VIOLATIONS OF T.C.A. § 48-1-112(A)(2)(J).
Initiated By:	TENNESSEE SECURITIES DIVISION
Date Initiated:	07/17/2023
Docket/Case Number:	MATTER NO.: 23-01038
URL for Regulatory Action:	HTTPS://WWW.TN.GOV/CONTENT/DAM/TN/COMMERCE/DOCUMENTS/SECURITIES/CONSENTORDERS/RAYMOND%20JAMES%20CONSENT%20ORDER%20ENTERED%20AND%20EXECUTED.PDF
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Restitution
Other Sanction(s)/Relief Sought:	CENSURE; CIVIL PENALTY / ADMINISTRATIVE FINE; MISC. UNDERTAKINGS
Resolution:	Order
Resolution Date:	02/28/2024



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 \$75,000.00
Disgorgement/Restitution
Cease and Desist/Injunction

Other Sanctions Ordered: MISC. UNDERTAKINGS

Sanction Details: RESPONDENTS, JOINTLY AND SEVERALLY, SHALL PAY AN ADMINISTRATIVE FINE, PENALTY, AND/OR MONEY, FURTHER COSTS OF INVESTIGATION INCURRED BY THE LEAD STATES, AND \$75,000 TO THE NORTH AMERICAN SECURITIES ADMINISTRATORS ASSOCIATION ("NASAA"), TOTALING \$4,200,000. THIS AMOUNT, EXCLUSIVE OF ANY INVESTIGATIVE COSTS PAID TO THE LEAD STATES AND THE ALLOCATION TO NASAA, SHALL BE DISTRIBUTED INDIVIDUALLY TO THOSE JURISDICTIONS WHO AGREE TO THE TERMS SET FORTH HEREIN. RESPONDENTS SHALL PAY A MONETARY CONTRIBUTION IN THE AMOUNT OF \$75,000 TO THE TENNESSEE SECURITIES INVESTOR EDUCATION FUND.

Reporting Source: Firm

Current Status: Final

Allegations: RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.

Initiated By: TENNESSEE SECURITIES DIVISION

Date Initiated: 02/28/2024

Docket/Case Number: 23-01038

Principal Product Type: Equity - OTC

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.



Resolution:	Consent
Resolution Date:	02/28/2024
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO TENNESSEE AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN TENNESSEE CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$336,118.70. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	THE FIRM NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF TENN. CODE ANN.§ 48-1-112(A)(2)(J).

Disclosure 9 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	STATE OF ALASKA
Date Initiated:	02/24/2024
Docket/Case Number:	23-111-S
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)



Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	02/24/2024
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO ALASKA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN ALASKA CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$25,223.09. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	THE FIRM NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION AS 45.55.060(B) AND 46.56.400(D)(9).

Disclosure 10 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	STATE OF NEVADA, SECURITIES DIVISION
Date Initiated:	02/28/2024
Docket/Case Number:	INV23-174
Principal Product Type:	Equity - OTC
Other Product Type(s):	



Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	02/28/2024
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO NEVADA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN NEVADA CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$45,996.79. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	THE FIRM NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF NRS 90.420(1)(1).

Disclosure 11 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	STATE OF GEORGIA, COMMISSIONER OF SECURITIES
Date Initiated:	02/28/2024
Docket/Case Number:	N/A
Principal Product Type:	Equity - OTC



Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	02/28/2024
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO GEORGIA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN GEORGIA CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$343,914.40. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	THE FIRM NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF THE O.C.G.A. SECTION 10-S-41(D)(9) OF THE GEORGIA SECURITIES ACT OF 2008.

Disclosure 12 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	FAILED TO ENSURE TRANSACTIONS WERE EXECUTED AT A FAIR AND REASONABLE PRICE; DID NOT REASONABLY SURVEIL TRANSACTIONS WHICH APPLIED THE MINIMUM EQUITY COMMISSION, PREVIOUSLY FAILED TO ENGAGE SYSTEMS TO REASONABLY MONITOR EQUITY COMMISSIONS. RESPONDENTS CHARGED UNREASONABLE COMMISSIONS OVER \$8,250,000 ON APPROXIMATELY 270,000 EQUITY TRANSACTIONS NATIONWIDE OVER THE PAST FIVE YEARS, IN FLORIDA, RESPONDENTS EXECUTED OVER 31,148 TRANSACTIONS CHARGED UNREASONABLE COMMISSION TOTALING \$957,752.48



Initiated By:	FLORIDA
Date Initiated:	02/22/2024
Docket/Case Number:	116857-S
URL for Regulatory Action:	
Principal Product Type:	Other
Other Product Type(s):	COMMISSION FOR EQUITY TRANSACTIONS
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	RESTITUTION, ADMINISTRATIVE FINE
Resolution:	Consent
Resolution Date:	02/22/2024
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	Yes
Sanctions Ordered:	Monetary/Fine \$4,200,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	RESTITUTION
Sanction Details:	RESPONDENTS SHALL PROVIDE RESTITUTION NO LESS THAN \$8,383,167.46 PLUS 6% INTEREST TO CUSTOMERS, PROVIDING THE PORTION OF COMMISSION AND MARKUPS OVER 5% PAID BY ALL CUSTOMERS FOR WHOM THE MINIMUM EQUITY COMMISSION APPLIED; RESPONDENTS SHALL PROVIDE RESTITUTION PLUS INTEREST TO AFFECTED FLORIDA CUSTOMERS TOTALING \$1,096, 109.24
Regulator Statement	ON 2/22/2024, THE OFFICE OF FINANCIAL REGULATION ("OFFICE") ENTERED A FINAL ORDER ADOPTING THE STIPULATION AND CONSENT AGREEMENT IN THE MATTER OF RAYMOND JAMES & ASSOCIATES, INC., AND RAYMOND JAMES FINANCIAL SERVICES, INC. (COLLECTIVELY THE "RESPONDENTS") FOLLOWING A COORDINATED INVESTIGATION LED BY SIX JURISDICTIONS. THE OFFICE ORDERED: 1. RESPONDENTS SHALL PERMANENTLY CEASE AND DESIST FROM CONDUCT IN VIOLATION OF RULE 69W-600.013 (L)(H) 1. (2021), FLORIDA ADMINISTRATIVE CODE, 2. RESPONDENTS SHALL PROVIDE RESTITUTION IN AN AMOUNT OF NO LESS THAN \$8,383,167.46 PLUS 6% INTEREST TO CUSTOMERS, PROVIDING THE PORTION OF COMMISSIONS AND MARKUPS OVER 5% PAID BY ALL



CUSTOMERS FOR WHOM THE MINIMUM EQUITY COMMISSION APPLIED. RESPONDENTS SHALL PROVIDE RESTITUTION PLUS INTEREST TO AFFECTED FLORIDA CUSTOMERS TOTALING \$1,096,109.24; 3. RESPONDENTS SHALL PAY AN ADMINISTRATIVE FINE, FURTHER COSTS OF INVESTIGATION INCURRED BY THE LEAD STATES, AND \$75,000 TO THE NASAA, TOTALING \$4,200,000. RESPONDENTS SHALL PAY \$75,000 TO THE OFFICE ETC. 4. RESPONDENTS SHALL COMPLY WITH ALL PROVISIONS OF THE INCORPORATED AGREEMENT

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	STATE OF FLORIDA, OFFICE OF FINANCIAL REGULATION
Date Initiated:	02/22/2024
Docket/Case Number:	116857-S
Principal Product Type:	Direct Investment(s) - DPP & LP Interest(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	02/22/2024
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL



SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO FLORIDA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN FLORIDA CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$1,096,109.24. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.

Firm Statement

THE FIRM NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF RULE 69W-600.013(L)(H) 1.(2021), FLORIDA ADMINISTRATIVE CODE.

Disclosure 13 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	STATE OF CONNECTICUT, DEPT. OF BANKING
Date Initiated:	01/31/2024
Docket/Case Number:	CO-24-202326-S
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	01/31/2024
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS



RELATED TO COMMISSIONS.

Sanction Details:

RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO CONNECTICUT AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CONNECTICUT CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$129,145.74. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.

Firm Statement

THE FIRM NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF SECTION 36B-31-6F(B) OF CT REGULATIONS.

Disclosure 14 of 128

Reporting Source:

Regulator

Current Status:

Final

Allegations:

ON JANUARY 4, 2024, THE SECURITIES DIVISION ENTERED INTO A CONSENT ORDER WITH RESPONDENTS RAYMOND JAMES & ASSOCIATES, INC. ("RJA") AND RAYMOND JAMES FINANCIAL SERVICES, INC. ("RJFS") AS PART OF A MULTISTATE SETTLEMENT TO RESOLVE THE SECURITIES DIVISION'S INVESTIGATION INTO RESPONDENTS MINIMUM COMMISSION PRACTICES FOR EQUITY TRANSACTIONS. THE INVESTIGATION REVEALED THAT RESPONDENTS TOOK A COMMISSION ON EQUITY TRANSACTIONS IN EXCESS OF 5% OF THE PRINCIPAL VALUE, SOMETIMES TAKING 100% OF THE PROCEEDS FROM A CUSTOMER'S SALE. IN WASHINGTON, RESPONDENTS EXECUTED ABOUT 3,521 TRANSACTIONS WHICH INCLUDED AN UNREASONABLE COMMISSION FOR SERVICES PERFORMED (I.E. IN EXCESS OF 5% OF THE PRINCIPAL TRADE AMOUNT) TOTALING APPROXIMATELY \$107,329.76.

IN ADDITION TO A MONETARY SETTLEMENT OF \$100,000 TO THE WA DFI, RESPONDENTS AGREED PAY RESTITUTION PLUS INTEREST TO AFFECTED WASHINGTON CUSTOMERS IN AN AMOUNT NO LESS THAN \$122,506.29 AND TO ATTEST THAT ITS POLICIES AND PROCEDURES HAVE BEEN ENHANCED TO ENSURE THAT ALL COMMISSIONS ARE FAIR AND REASONABLE WITHIN 60 DAYS AFTER THE EFFECTIVE DATE OF DFI'S ORDER. THIS ATTESTATION WILL INCLUDE RAYMOND JAMES'S CERTIFYING THAT IT HAS ESTABLISHED:

- ?COMPLIANCE SYSTEMS TO PREVENT THE IMPOSITION OF UNREASONABLE OR UNFAIR COMMISSIONS;
- ?OPERATIONAL CHANGES DESIGNED TO ENSURE THAT, REGARDLESS OF THE PRINCIPAL AMOUNT OF A TRANSACTION, COMMISSIONS WILL NOT EXCEED 5%, IN THE ABSENCE OF A DOCUMENTED EXCEPTION; AND
- ?SYSTEMS THAT INCORPORATE ALL EQUITY TRANSACTIONS, REGARDLESS OF THE PRINCIPAL AMOUNT OF THE TRANSACTION, WHEN IDENTIFYING AND REVIEWING POTENTIALLY EXCESSIVE COMMISSIONS.



Initiated By: WASHINGTON

Date Initiated: 01/30/2024

Docket/Case Number: S-23-3590-23-CO01

URL for Regulatory Action:

Principal Product Type: Equity - OTC

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 01/30/2024

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 \$100,000.00
Disgorgement/Restitution
Cease and Desist/Injunction
Revocation/Expulsion/Denial

Other Sanctions Ordered: CIVIL & ADMINISTRATIVE FINES

Sanction Details: FINES \$100000.00

Regulator Statement ON JANUARY 4, 2024, THE SECURITIES DIVISION ENTERED INTO A CONSENT ORDER WITH RESPONDENTS RAYMOND JAMES & ASSOCIATES, INC. ("RJA") AND RAYMOND JAMES FINANCIAL SERVICES, INC. ("RJFS") AS PART OF A MULTISTATE SETTLEMENT TO RESOLVE THE SECURITIES DIVISION'S INVESTIGATION INTO RESPONDENTS MINIMUM COMMISSION PRACTICES FOR EQUITY TRANSACTIONS. THE INVESTIGATION REVEALED THAT RESPONDENTS TOOK A COMMISSION ON EQUITY TRANSACTIONS IN EXCESS OF 5% OF THE PRINCIPAL VALUE, SOMETIMES TAKING 100% OF THE PROCEEDS FROM A CUSTOMER'S SALE. IN WASHINGTON, RESPONDENTS EXECUTED ABOUT 3,521 TRANSACTIONS WHICH INCLUDED AN UNREASONABLE COMMISSION FOR SERVICES PERFORMED (I.E. IN EXCESS OF 5% OF THE PRINCIPAL TRADE AMOUNT) TOTALING APPROXIMATELY \$107,329.76.



IN ADDITION TO A MONETARY SETTLEMENT OF \$100,000 TO THE WA DFI, RESPONDENTS AGREED PAY RESTITUTION PLUS INTEREST TO AFFECTED WASHINGTON CUSTOMERS IN AN AMOUNT NO LESS THAN \$122,506.29 AND TO ATTEST THAT ITS POLICIES AND PROCEDURES HAVE BEEN ENHANCED TO ENSURE THAT ALL COMMISSIONS ARE FAIR AND REASONABLE WITHIN 60 DAYS AFTER THE EFFECTIVE DATE OF DFI'S ORDER. THIS ATTESTATION WILL INCLUDE RAYMOND JAMES'S CERTIFYING THAT IT HAS ESTABLISHED: ?COMPLIANCE SYSTEMS TO PREVENT THE IMPOSITION OF UNREASONABLE OR UNFAIR COMMISSIONS; ?OPERATIONAL CHANGES DESIGNED TO ENSURE THAT, REGARDLESS OF THE PRINCIPAL AMOUNT OF A TRANSACTION, COMMISSIONS WILL NOT EXCEED 5%, IN THE ABSENCE OF A DOCUMENTED EXCEPTION; AND ?SYSTEMS THAT INCORPORATE ALL EQUITY TRANSACTIONS, REGARDLESS OF THE PRINCIPAL AMOUNT OF THE TRANSACTION, WHEN IDENTIFYING AND REVIEWING POTENTIALLY EXCESSIVE COMMISSIONS.

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	WASHINGTON DEPT. OF FINANCIAL INSTITUTIONS
Date Initiated:	01/20/2024
Docket/Case Number:	S-23-3590-23-CO01
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	01/20/2024
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution



Cease and Desist/Injunction

Other Sanctions Ordered:

IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.

Sanction Details:

RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO WASHINGTON AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN WASHINGTON CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$112,506.29. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.

Firm Statement

THE FIRM NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF RCW 21.20.110(1)(J).

Disclosure 15 of 128

Reporting Source:

Firm

Current Status:

Final

Allegations:

RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.

Initiated By:

MAINE OFFICE OF SECURITIES

Date Initiated:

01/18/2024

Docket/Case Number:

2023-21

Principal Product Type:

Equity - OTC

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

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

Other Sanction(s)/Relief Sought:

RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.

Resolution:

Consent

Resolution Date:

01/18/2024

Sanctions Ordered:

Censure
Monetary/Fine \$75,000.00



Disgorgement/Restitution
Cease and Desist/Injunction

Other Sanctions Ordered:

IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.

Sanction Details:

RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO MAINE AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN MAINE CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$58,042.65. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.

Firm Statement

THE FIRM NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF MAINE UNIFORM SECURITIES ACT AND MAINE OFFICE OF SECURITIES RULES.

Disclosure 16 of 128**Reporting Source:**

Firm

Current Status:

Final

Allegations:

RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.

Initiated By:

NEBRASKA DEPT. OF BANKING AND FINANCE

Date Initiated:

01/17/2024

Docket/Case Number:**Principal Product Type:**

Equity - OTC

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

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

Other Sanction(s)/Relief Sought:

RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.

Resolution:

Consent

Resolution Date:

01/17/2024



Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO NEBRASKA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN NEBRASKA CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$68,675.63. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	THE FIRM NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF NEB. REV. STAT. § 8-1103(9)(A)(XI) (REISSUE 2022).

Disclosure 17 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	OREGON DEPT. OF CONSUMER AND BUSINESS SERVICES
Date Initiated:	01/16/2024
Docket/Case Number:	S-23-0045
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent



Resolution Date:	01/16/2024
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO OREGON AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN OREGON CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$109,349.94. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	THE FIRM NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF ORS 59.205(13), AND OAR 441-205-0210(1).

Disclosure 18 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	HAWAII DEPT. COMMERCE AND CONSUMER AFFAIRS
Date Initiated:	01/11/2024
Docket/Case Number:	SEB20230057
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.



Resolution:	Consent
Resolution Date:	01/11/2024
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO HAWAII AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN HAWAII CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$50,418.64. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES & ASSOCIATES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF HAR SECTION 16-39-470(B)(9) AND HRS SECTION 485A-412(D)(9).

Disclosure 19 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	OHIO DEPT. OF COMMERCE
Date Initiated:	01/03/2024
Docket/Case Number:	24-001
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)



Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	01/03/2024
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO OHIO AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN OHIO CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$346,111.83. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES & ASSOCIATES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF OHIO REVISED CODE 1707.19(A)(1)(I).

Disclosure 20 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	FAILURE TO SUPERVISE
Initiated By:	MINNESOTA DEPARTMENT OF COMMERCE
Date Initiated:	12/14/2023
Docket/Case Number:	81981
URL for Regulatory Action:	
Principal Product Type:	Other
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist



Other Sanction(s)/Relief Sought:	CIVIL PENALTY AND RESTITUTION
Resolution:	Consent
Resolution Date:	12/24/2023
Sanctions Ordered:	Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	4,200,0000 TOTAL FINE, 75,000 TO MN
<hr/>	
Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	MINNESOTA DEPT. OF COMMERCE
Date Initiated:	12/14/2023
Docket/Case Number:	81981
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	12/14/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO



CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.

Sanction Details:

RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO MINNESOTA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN MINNESOTA CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$117,577.70. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.

Firm Statement

RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF MINN. STAT. §80A.67(D)(9).

Disclosure 21 of 128

Reporting Source:

Regulator

Current Status:

Final

Allegations:

RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. ("RESPONDENT") CHARGED UNREASONABLE/UNFAIR COMMISSION ON APPROXIMATELY 270,000 LOW-PRINCIPAL EQUITY TRANSACTIONS NATIONWIDE OVER THE PAST FIVE YEARS TOTALING OVER \$8,25,000. THE RESPONDENTS DID NOT REASONABLY SURVIVE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED ITS CUSTOMERS A REASONABLE COMMISSION AND FEES.

SECTION 115.10(A) OF THE BOARD RULES REQUIRES BROKER-DEALERS TO ESTABLISH, MAINTAIN, AND ENFORCE A SYSTEM TO SUPERVISE THE ACTIVITIES OF ITS AGENTS THAT IS REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE ACT, THE BOARD RULES, AND ALL APPLICABLE SECURITIES LAWS AND REGULATIONS.

THE RESPONDENTS' ACTS AND PRACTICES, AS DESCRIBED ABOVE, CONSTITUTE A VIOLATION OF §115.10 OF THE BOARD RULES.

PURSUANT TO §4007.105(A)(13)(B) OF THE ACT, RESPONDENT VIOLATIONS OF §115.10 OF THE BOARD RULES CONSTITUTE A BASIS FOR THE ISSUANCE OF AN ORDER REPRIMANDING RESPONDENTS.

PURSUANT TO §4007.106(A)(3) OF THE ACT, RESPONDENTS' VIOLATIONS OF §115.10 OF THE BOARD RULES CONSTITUTE A BASIS FOR THE ASSESSMENT OF AN ADMINISTRATIVE FINE.

IT IS HEREBY ORDERED THAT THE RESPONDENTS ARE REPRIMANDED. THE RESPONDENTS SHALL PROVIDE RESTITUTION IN AN AMOUNT OF NO LESS THAN \$8,383,167.46 PLUS INTEREST IN THE AMOUNT OF 6% TO



CUSTOMERS, PROVIDING THE PORTION OF COMMISSIONS AND MARKUPS OVER 5% PAID BY ALL CUSTOMERS FOR WHOM THE MINIMUM EQUITY COMMISSION APPLIED FROM JULY 1, 2018, TO JULY 17, 2023. RESPONDENTS SHALL PROVIDE RESTITUTION PLUS INTEREST TO AFFECTED TEXAS CUSTOMERS IN AN AMOUNT OF \$ 726,447.46.

RESPONDENTS, JOINTLY AND SEVERALLY, SHALL PAY AN ADMINISTRATIVE FINE, FURTHER COSTS OF INVESTIGATION INCURRED BY THE LEAD STATES, AND \$75,000 TO THE NORTH AMERICAN SECURITIES ADMINISTRATORS ASSOCIATION ("NASAA"), TOTALING \$4,200,000. RESPONDENTS SHALL PAY \$75,000.00 TO THE TEXAS WITHIN THIRTY (30) CALENDAR DAYS FOLLOWING THE DATE OF THE ENTRY OF THIS ORDER.

Initiated By:	TEXAS
Date Initiated:	12/21/2023
Docket/Case Number:	IC23-CAF-08
URL for Regulatory Action:	HTTPS://SSB.TEXAS.GOV/SITES/DEFAULT/FILES/2023-12/IC23_CAF_08.PDF
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Reprimand
Other Sanction(s)/Relief Sought:	CONSENT ORDER; CEASE AND DESIST; FINE
Resolution:	Order
Resolution Date:	12/21/2023
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 \$75,000.00
Other Sanctions Ordered:	CONSENT ORDER; REPRIMAND; CEASE AND DESIST
Sanction Details:	NO INFORMATION FIELD



Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	TEXAS STATE SECURITIES BOARD
Date Initiated:	12/21/2023
Docket/Case Number:	IC23-CAF-08
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	12/21/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO TEXAS AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN TEXAS CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$726,477.46. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF TEXAS BOARD RULE SECTION 115.10.



Disclosure 22 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	DELAWARE DEPT. OF JUSTICE, INVESTOR PROTECTION UNIT
Date Initiated:	12/22/2023
Docket/Case Number:	23-0173
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	12/22/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO DELWARE AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN DELAWARE CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$26,611.99. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR



DENIED THE STATEMENT OF FACTS AND VIOLATION OF DELAWAARE
SECURITIES ACT 73-304(A)(10).

Disclosure 23 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	PUERTO RICO COMMISSIONER OF FINANCIAL INSTITUTIONS
Date Initiated:	10/11/2023
Docket/Case Number:	N/A
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	10/11/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO PUERTO RICO AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN PUERTO RICO CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$2,388.73. FURTHER, TOTAL RESTITUTION TO PARTICIPATING



STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.

Firm Statement

RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF PRUSA ARTICLE 204(A)(2)(J) AND REGULATION 6078, ARTICLE 28, SECTION 28.2.

Disclosure 24 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	VERMONT DEPT. OF FINANCIAL REGULATION
Date Initiated:	11/03/2023
Docket/Case Number:	23-017-S
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	11/03/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO VERMONT AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION



PAYMENTS TO CERTAIN VERMONT CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$28,198.46. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.

Firm Statement

RAYMOND JAMES & ASSOCIATES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF V.S.R. SEC. 2-2(B)(2).

Disclosure 25 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	SOUTH DAKOTA DEPT. OF INSURANCE
Date Initiated:	12/13/2023
Docket/Case Number:	1019068
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	12/13/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO SOUTH DAKOTA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING



STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN SOUTH DAKOTA CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$29,136.11. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.

Firm Statement

RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF SDCL 47-31B-412(D)(9).

Disclosure 26 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	NEW HAMPSHIRE BUREAU OF SECURITIES REGULATION
Date Initiated:	12/18/2023
Docket/Case Number:	INV-2023-000024
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	12/18/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL



SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO NEW HAMPSHIRE AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE NEW HAMPSHIRE CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$39,303.73. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.

Firm Statement

RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF RSA 421-B:4-412(D)(9).

Disclosure 27 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC, AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	DISTRICT OF COLUMBIA
Date Initiated:	12/18/2023
Docket/Case Number:	SB-CO-10-23
URL for Regulatory Action:	
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; UNDERTAKINGS
Resolution:	Order
Resolution Date:	12/18/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINES, RESTITUTION PAYMENT TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS COMPREHENSIVE REVIEW



OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSION.

Sanction Details:

RAYMOND JAMES & ASSOCIATES, INC., AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000.00 TO THE DISTRICT OF COLUMBIA AND, IN TOTAL \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN DISTRICT OF COLUMBIA CUSTOMERS OF NO LESS THAN \$16,292.51. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$ 8,250,000.

Regulator Statement

RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF THE DISTRICT OF COLUMBIA.

Reporting Source:

Firm

Current Status:

Final

Allegations:

RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.

Initiated By:

DISTRICT OF COLUMBIA DEPT. OF INSURANCE, SECURITIES AND BANKING

Date Initiated:

12/19/2023

Docket/Case Number:

SB-CO-10-23

Principal Product Type:

Equity - OTC

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

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

Other Sanction(s)/Relief Sought:

RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.

Resolution:

Consent

Resolution Date:

12/19/2023

Sanctions Ordered:

Censure
Monetary/Fine \$75,000.00
Disgorgement/Restitution
Cease and Desist/Injunction



Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO DISTRICT OF COLUMBIA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN D.C. CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$16,292.51. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF D.C. OFFICIAL CODE SEC.31-5602.07(A)(12).

Disclosure 28 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	RESPONDENT'S MINIMUM COMMISSION PRACTICES FOR EQUITY TRANSACTIONS FAILED TO ENSURE TRANSACTIONS WERE EXECUTED AT A FAIR AND REASONABLE PRICE. RESPONDENT DID NOT REASONABLY SURVEIL TRANSACTIONS WHICH APPLIED THE MINIMUM EQUITY COMMISSION. RESPONDENT PREVIOUSLY FAILED TO ENGAGE SYSTEMS TO REASONABLY MONITOR EQUITY COMMISSIONS.
Initiated By:	NEW JERSEY BUREAU OF SECURITIES
Date Initiated:	12/20/2023
Docket/Case Number:	N/A
URL for Regulatory Action:	HTTPS://WWW.NJCONSUMERAFFAIRS.GOV/ACTIONS/2023_1220_RAYMOND_JAMESASSOC_CONSENT_ORDER_NJ_RJ-EXECUTED.PDF
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	CENSURE, RESTITUTION
Resolution:	Consent



Resolution Date: 12/20/2023

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 \$75,000.00
Disgorgement/Restitution

Other Sanctions Ordered: RESPONDENTS SHALL PROVIDE RESTITUTION PLUS INTEREST TO AFFECTED NEW JERSEY CUSTOMERS IN AN AMOUNT OF \$241,814.73. THE CHIEF COMPLIANCE OFFICER ("CCO") SHALL CERTIFY IN WRITING TO THE BUREAU WITHIN SIXTY (60) DAYS OF THE DATE OF ENTRY OF THIS ORDER THAT THE RESPONDENT'S POLICIES AND PROCEDURES HAVE BEEN CHANGED AND ENHANCED TO ENSURE THAT ALL COMMISSIONS ARE FAIR AND REASONABLE.

Sanction Details: DURING THE RELEVANT TIME PERIOD IN NEW JERSEY, RESPONDENT EXECUTED APPROXIMATELY 41,515 EQUITY BUY TRANSACTIONS AND APPROXIMATELY 97,120 EQUITY SELL TRANSACTIONS NATIONWIDE WHICH INCLUDED COMMISSIONS IN EXCESS OF 5% OF THE PRINCIPAL VALUE. IN NEW JERSEY, RESPONDENT EXECUTED TRANSACTIONS WHICH INCLUDED AN UNREASONABLE COMMISSION FOR SERVICES PERFORMED (I.E. IN EXCESS OF 5% OF THE PRINCIPAL TRADE AMOUNT).

Reporting Source: Firm

Current Status: Final

Allegations: RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.

Initiated By: NEW JERSEY BUREAU OF SECURITIES

Date Initiated: 12/20/2023

Docket/Case Number:

Principal Product Type: Equity - OTC

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)



Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	12/20/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO NEW JERSEY AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN NEW JERSEY CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$241,814.73. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF N.J.S.A. 49:3-58(A)(2)(XI).

Disclosure 29 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	STATE OF OKLAHOMA, DEPT. OF SECURITIES
Date Initiated:	11/28/2023
Docket/Case Number:	24-014
Principal Product Type:	Equity - OTC
Other Product Type(s):	



Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	11/28/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO OKLAHOMA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN OKLAHOMA CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$77,951.99. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF OKLAHOMA §1-411(D)(9).

Disclosure 30 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	SOUTH CAROLINA SECURITIES COMMISSIONER
Date Initiated:	10/16/2023
Docket/Case Number:	20232794



Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	10/16/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO SOUTH CAROLINA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN SOUTH CAROLINA CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$178,212.19. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF SOUTH CAROLINA CODE ANN. §35-1-412(D)(9).

Disclosure 31 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	WEST VIRGINIA SECURITIES COMMISSION
Date Initiated:	11/17/2023



Docket/Case Number:	23-0064
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	11/17/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO WEST VIRGINIA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN WEST VIRGINIA CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$41,361.14. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF WEST VIRGINA CODE §32-2-204(A)(J).

Disclosure 32 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	MONTANA STATE AUDITOR, COMMISSIONER OF SECURITIES AND INSURANCE



Date Initiated:	11/16/2023
Docket/Case Number:	SEC-2023-00197
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	11/16/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO MONTANA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN MONTANA CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$37,027.99. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF MONTANA CODE ANN §30-10-201(13)(K).

Disclosure 33 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED



CUSTOMERS A REASONABLE COMMISSION AND FEE.

Initiated By:	STATE OF ILLINOIS, SECURITIES DIVISION
Date Initiated:	11/17/2023
Docket/Case Number:	2300108
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	11/17/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO ILLINOIS AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN ILLINOIS CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$381,578.34. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF ILLINOIS SECURITIES ACT 8.E(1)(E)(IV).

Disclosure 34 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL



THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.

Initiated By:	COLORADO SECURITIES COMMISSIONER
Date Initiated:	10/31/2023
Docket/Case Number:	2023-CDS-020
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	10/31/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO COLORADO AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN COLORADO CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$234,566.40. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF § 11-51-410(1)(I), C.R.S.

Disclosure 35 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL



SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.

Initiated By:	WISCONSIN DEPT. OF FINANCIAL INSTITUTIONS
Date Initiated:	10/18/2023
Docket/Case Number:	S-248331 (LX)
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	10/18/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO WISCONSIN AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN WISCONSIN CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$109,009.92. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION WISCONSIN ADMIN CODE DFI-SEC. 4.05(S).

Disclosure 36 of 128

Reporting Source: Regulator



Current Status: Final

Allegations: RESPONDENT FAILED TO REASONABLE SUPERVISE UNDER SECTION 61-1-6(2)(A)(II)(J) OF THE UTAH UNIFORM SECURITIES ACT.

Initiated By: UTAH

Date Initiated: 10/12/2023

Docket/Case Number: SD-23-0028

URL for Regulatory Action:

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: Stipulation and Consent

Resolution Date: 10/12/2023

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 \$75,000.00
Disgorgement/Restitution
Cease and Desist/Injunction

Other Sanctions Ordered: RESTITUTION OF \$56,000.23 TO UTAH CUSTOMERS.

Sanction Details: REMEDIAL ACTIONS INCLUDE AMENDING POLICIES AND PROCEDURES TO ENSURE ALL COMMISSIONS ARE FAIR AND REASONABLE.

Reporting Source: Firm

Current Status: Final

Allegations: RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED



CUSTOMERS A REASONABLE COMMISSION AND FEE.

Initiated By:	UTAH SECURITIES DIVISION
Date Initiated:	10/16/2023
Docket/Case Number:	SD-23-0028
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	10/16/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO UTAH AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN UTAH CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$56,000.23. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF UTAH UNIFORM SECURITIES ACT, SECTION 61-1-6(2)(A)(II)(J).

Disclosure 37 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-



PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.

Initiated By:	ARKANSAS SECURITIES COMMISSIONER
Date Initiated:	10/03/2023
Docket/Case Number:	S-23-0014
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	10/03/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO ARKANSAS AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN ARKANSAS CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$129,802.26. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION ARKANSAS CODE SECTION 23-42-301(F) AND 23-42-308(A)(2)(J) AND RULE 301.01(C).

Disclosure 38 of 128

Reporting Source:	Firm
Current Status:	Final



Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	NORTH DAKOTA SECURITIES DIVISION
Date Initiated:	10/05/2023
Docket/Case Number:	23-1707
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	10/17/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO NORTH DAKOTA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN NORTH DAKOTA CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$34,926.00. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF N.D.C.C. SECTION 10-04-11(1).

Disclosure 39 of 128

Reporting Source: Firm



Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	MISSISSIPPI SECRETARY OF STATE, SECURITIES DIVISION
Date Initiated:	10/16/2023
Docket/Case Number:	LS-23-6217
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	10/16/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO MISSISSIPPI AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN MISSISSIPPI CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$117,297.55. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF MS SECURITIES ACT, SECTION 75-71-412(D)(9).



Disclosure 40 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	STATE OF MICHIGAN, DEPT. OF LICENSING AND REGULATORY AFFAIRS
Date Initiated:	10/17/2023
Docket/Case Number:	ENF-23-020104
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	10/17/2023
Sanctions Ordered:	Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO MICHIGAN AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN MICHIGAN CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$539,950.22. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.
Firm Statement	RAYMOND JAMES FIANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF MCL 451.2412(4)(I).



Disclosure 41 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	RESPONDENTS' MINIMUM COMMISSION PRACTICES FOR EQUITY TRANSACTIONS FAILED TO ENSURE TRANSACTIONS WERE EXECUTED AT A FAIR AND REASONABLE PRICE. RESPONDENTS DID NOT REASONABLY SURVEIL TRANSACTIONS WHICH APPLIED THE MINIMUM EQUITY COMMISSION. RESPONDENTS PREVIOUSLY FAILED TO ENGAGE SYSTEMS TO REASONABLY MONITOR EQUITY COMMISSIONS.
Initiated By:	KENTUCKY
Date Initiated:	10/03/2023
Docket/Case Number:	2023-AH-0014
URL for Regulatory Action:	HTTPS://KFI.KY.GOV/DOCUMENTS/2023-AH-0014%20RAYMOND%20JAMES%20&%20ASSOCIATES%20INC%20AND%20RAYMOND%20JAMES%20FINANCIAL%20SERVICES%20INC.PDF
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	RESTITUTION OF \$212,150.59 TO KENTUCKY CUSTOMERS. ADMINISTRATIVE FINE OF \$75,000 TO KENTUCKY DFI. AMEND POLICIES AND PROCEDURES TO ENSURE ALL COMMISSIONS ARE FAIR AND REASONABLE.
Resolution:	Consent
Resolution Date:	10/03/2023
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 \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	



Sanction Details: CEASE & DESIST
 RESTITUTION OF \$212,150.59 TO KENTUCKY CUSTOMERS.
 ADMINISTRATIVE FINE OF \$75,000 TO KENTUCKY DFI.
 AMEND POLICIES AND PROCEDURES TO ENSURE ALL COMMISSIONS ARE
 FAIR AND REASONABLE.

Reporting Source: Firm

Current Status: Final

Allegations: RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.

Initiated By: KENTUCKY DEPT. OF FINANCIAL INSTITUTIONS

Date Initiated: 10/03/2023

Docket/Case Number: 2023-AH-0014

Principal Product Type: Equity - OTC

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.

Resolution: Consent

Resolution Date: 10/03/2023

Sanctions Ordered: Censure
 Monetary/Fine \$75,000.00
 Disgorgement/Restitution
 Cease and Desist/Injunction

Other Sanctions Ordered: IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.

Sanction Details: RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO KENTUCKY AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION



PAYMENTS TO CERTAIN KENTUCKY CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$212,150.59. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.

Firm Statement

RAYMOND JAMES & ASSOCIATES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF KRS 292.337(2)(K) AND 808 KAR 10:030, SECTIONS 3 AND 4(1).

Disclosure 42 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	INDIANA SECURITIES DIVISION
Date Initiated:	09/27/2023
Docket/Case Number:	23-0014CA
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	09/27/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF



\$75,000 TO INDIANA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN INDIANA CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$238,117.87. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,383,167.46.

Firm Statement

RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF I.C. §23-19-4-12(D)(9) AND 710 I.A.C. §4-7-6.

Disclosure 43 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	CALIFORNIA DEPT. OF FINANCIAL PROTECTION AND INNOVATION
Date Initiated:	07/10/2023
Docket/Case Number:	8663
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	07/10/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS, CCO CERTIFICATIONS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.



Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$75,000 TO CALIFORNIA AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CALIFORNIA CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$465,000. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,250,000.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF CSL SECTION 25218 AND CODE OF REGULATIONS, TITLE 10, SECTION 260.218.4

Disclosure 44 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	MASSACHUSETTS
Date Initiated:	07/10/2023
Docket/Case Number:	E-2023-0041
URL for Regulatory Action:	HTTPS://WWW.SEC.STATE.MA.US/DIVISIONS/SECURITIES/DOWNLOAD/CONSENT-ORDER-NO-E20230041.PDF
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RESTITUTION; CENSURE; CEASE AND DESIST; AND UNDERTAKINGS.
Resolution:	Consent
Resolution Date:	07/10/2023



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 \$100,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$100,000 TO MASSACHUSETTS AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN MASSACHUSETTS CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$185,000. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,250,000.
Regulator Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF G.L. C. 110A, SEC. 204(A)(2)(J).

Reporting Source:	Firm
Current Status:	Final
Allegations:	RAYMOND JAMES FINANCIAL SERVICES, INC. AND RAYMOND JAMES & ASSOCIATES, INC. CHARGED UNREASONABLE COMMISSIONS ON LOW-PRINCIPAL EQUITY TRANSACTIONS AND DID NOT REASONABLY SURVEIL THESE TRANSACTIONS TO ENSURE THAT RESPONDENTS CHARGED CUSTOMERS A REASONABLE COMMISSION AND FEE.
Initiated By:	MASSACHUSETTS
Date Initiated:	07/10/2023
Docket/Case Number:	E-2023-0041
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)



Other Sanction(s)/Relief Sought:	RESTITUTION, CENSURE, CEASE AND DESIST AND UNDERTAKINGS
Resolution:	Consent
Resolution Date:	07/10/2023
Sanctions Ordered:	Censure Monetary/Fine \$100,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	IN ADDITION TO ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN CUSTOMERS AND COMPREHENSIVE REVIEW OF POLICIES, PROCEDURES, AND COMPLIANCE SYSTEMS RELATED TO COMMISSIONS.
Sanction Details:	RAYMOND JAMES FINANCIAL SERVICES, INC. AND RAYMOND JAMES & ASSOCIATES, INC. WERE ORDERED TO PAY AN ADMINISTRATIVE FINE OF \$100,000 TO MASSACHUSETTS AND, IN TOTAL, \$4,200,000 TO PARTICIPATING STATES. IN ADDITION TO THE ADMINISTRATIVE FINE, RESTITUTION PAYMENTS TO CERTAIN MASSACHUSETTS CUSTOMERS IN AN AMOUNT OF NO LESS THAN \$185,000. FURTHER, TOTAL RESTITUTION TO PARTICIPATING STATES IN AN AMOUNT OF NO LESS THAN \$8,250,000.
Firm Statement	RAYMOND JAMES FINANCIAL SERVICES, INC. NEITHER ADMITTED NOR DENIED THE STATEMENT OF FACTS AND VIOLATION OF G.L. C. 110A, SEC. 204(A)(2)(J).

Disclosure 45 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT AND AN AFFILIATED COMPANY FAILED TO HAVE A QUALIFIED AND REGISTERED PRINCIPAL AUTHORIZE CHANGES TO THE ACCOUNT NAME OR DESIGNATION ON MORE THAN 7,500 EQUITY ORDERS. THE MATTER ORIGINATED WHEN THE FIRM REPORTED ON A FINRA RULE 4530 FILING THAT IT FAILED TO UNDERTAKE THE PRINCIPAL REVIEW REQUIRED BY FINRA RULE 4515. THE FINDINGS STATED THAT THE UNAPPROVED CHANGES RESULTED IN CUSTOMER LOSSES FOR ONE CUSTOMER IN THE APPROXIMATE AMOUNT OF \$100,000. A FORMER REGISTERED REPRESENTATIVE AT THE FIRM CHANGED THE ACCOUNT DESIGNATION ON CERTAIN ORDERS FROM (OR TO) THE CUSTOMER TO (OR FROM) HIS OWN ACCOUNT WITHOUT PRINCIPAL REVIEW. AFTER ITS SELF-REPORT, THE FIRMS HIRED A THIRD-PARTY CONSULTANT TO CONDUCT A



BACKWARD-LOOKING REVIEW OF TRANSACTIONS OVER A MULTI-YEAR PERIOD. THAT REVIEW RESULTED IN THE FIRM IDENTIFYING, AND SUBSEQUENTLY REIMBURSING, THE LOSSES IDENTIFIED HEREIN. THE FIRMS HAVE SINCE DESIGNATED REGISTERED PRINCIPALS ON THE TRADE DESKS TO REVIEW AND AUTHORIZE CHANGES TO ACCOUNT NAME AND DESIGNATION ON ORDERS. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO REASONABLY SUPERVISE REGISTERED REPRESENTATIVES WHO ENGAGED IN A SCHEME TO OVERCHARGE COMMISSIONS TO INSTITUTIONAL CUSTOMERS, WHICH THEY SERVICED AS PART OF A TEAM. THE REPRESENTATIVES OVERCHARGED INSTITUTIONAL CUSTOMERS BY CALLING THE TRADING DESK AFTER PLACING THE ORDERS AND INSTRUCTING THE TRADING DESK TO INCREASE THE COMMISSION BEING CHARGED PRIOR TO EXECUTION AND/OR WHILE THE ORDERS WERE BEING WORKED BY THE DESK. TO CONCEAL THEIR MISCONDUCT FROM THEIR CUSTOMERS, THE REPRESENTATIVES CREATED THEIR OWN TRADE CONFIRMATIONS, WHICH THEY THEN EMAILED TO CUSTOMERS. THESE CONFIRMATIONS CONTAINED MISLEADING INFORMATION, INCLUDING UNDERSTATING COMMISSIONS. IN TOTAL, THE REPRESENTATIVES OVERCHARGED CUSTOMERS APPROXIMATELY \$2.4 MILLION. MOST OF THE CUSTOMERS WERE PREVIOUSLY PAID BACK; ADDITIONAL RESTITUTION WITH RESPECT TO ONE CUSTOMER IS BEING ORDERED IN THE AWC. THE FIRM'S EMAIL SURVEILLANCE SYSTEM ELECTRONICALLY FLAGGED FOR MANUAL REVIEW HUNDREDS OF EMAILS SENT TO CUSTOMERS BY THE REPRESENTATIVES, WHICH EMAILS CONTAINED THE MISLEADING TRADE CONFIRMATIONS AS ATTACHMENTS. THE FIRM'S COMMUNICATIONS SURVEILLANCE TEAM REVIEWED THESE FLAGGED EMAILS BUT FAILED TO EXAMINE THE ATTACHED CONFIRMATIONS. HAD THE TEAM DONE SO, IT WOULD HAVE DISCOVERED THAT THE REPRESENTATIVES WERE MISREPRESENTING COMMISSIONS CHARGED ON TRADES, AS WELL AS MISSTATING THE SHARE PRICE. IN ADDITION, DURING A BRANCH INSPECTION, THE FIRM'S COMPLIANCE STAFF IDENTIFIED AND ESCALATED THE REPRESENTATIVE-CREATED CONFIRMATIONS, BUT NO ONE AT THE FIRM CHECKED THE CONFIRMATIONS FOR ACCURACY.

Initiated By: FINRA

Date Initiated: 10/20/2022

Docket/Case Number: [2018058633501](#)

Principal Product Type: Other

Other Product Type(s): EQUITY; UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief Sought:


Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/20/2022

Sanctions Ordered: Censure
Monetary/Fine \$800,000.00

Other Sanctions Ordered: INTEREST ON RESTITUTION; UNDERTAKING

Sanction Details: THE FIRM WAS CENSURED, FINED \$800,000, ORDERED TO PAY \$48,574.79, PLUS INTEREST, INRESTITUTION TO CUSTOMERS, AND REQUIRED TO CERTIFY THAT IT HAS COMPLETED ITS REVIEW OF ITSPOLICIES, PROCEDURES, AND SYSTEMS REGARDING MONITORING OF ELECTRONIC COMMUNICATIONSAND THEY ARE REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS

Disclosure 46 of 128

Reporting Source: Regulator

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, AND FAILED TO ESTABLISH, MAINTAIN AND ENFORCE WSPS, REASONABLY DESIGNED TO SUPERVISE REPRESENTATIVES' SHARE-CLASS RECOMMENDATIONS TO CUSTOMERS OF 529 SAVINGS PLANS. THE FINDINGS STATED THAT THE MATTER INVOLVES THE FIRM'S RESPECTIVE FAILURE TO SUPERVISE ITS ACTIVITIES TO ACHIEVE COMPLIANCE WITH ITS SUITABILITY OBLIGATIONS IN CONNECTION WITH ITS REPRESENTATIVES' 529 PLAN SHARE-CLASS RECOMMENDATIONS. UNTIL 2016, THE FIRM'S TRAINING MATERIALS SIMILARLY DID NOT PROVIDE ANY GUIDANCE TO REPRESENTATIVES REGARDING 529 PLAN SHARE CLASSES. ALTHOUGH THE FIRM MAINTAINED AN AUTOMATED SURVEILLANCE SYSTEM DESIGNED TO GENERATE EXCEPTION REPORTS TO IDENTIFY POTENTIALLY UNSUITABLE 529 PLAN SHARE-CLASS RECOMMENDATIONS, IT DID NOT HAVE ANY SYSTEM OR PROCEDURES TO TEST THIS SYSTEM AND IT FAILED TO DETECT A BREAKDOWN IN THE SYSTEM. AS A RESULT, THE FIRM FAILED TO CONDUCT A SUPERVISORY REVIEW OF APPROXIMATELY 1.6 MILLION 529 PLAN PURCHASES. IN ADDITION, EVEN WHEN THE SYSTEM GENERATED REPORTS AS INTENDED, THE FIRM DID NOT CONSISTENTLY USE THE REPORTS AND TOOK NO ACTION WHEN A POTENTIALLY UNSUITABLE TRANSACTION WAS FLAGGED. THE FINDINGS ALSO STATED THAT THE FIRM HAS AGREED TO PAY RESTITUTION RELATING TO THE



SALE OF CLASS C SHARES TO CERTAIN 529 PLAN CUSTOMERS IN THE
ESTIMATED AMOUNT OF \$4,203,182.

Initiated By: FINRA

Date Initiated: 11/06/2019

Docket/Case Number: [2018058041101](#)

Principal Product Type: Other

Other Product Type(s): SHARE CLASSES OF 529 SAVINGS PLANS

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 11/06/2019

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
Disgorgement/Restitution

Other Sanctions Ordered: PLUS INTEREST

Sanction Details: THE FIRM WAS CENSURED AND ORDERED TO PAY RESTITUTION IN THE ESTIMATED TOTAL AMOUNT OF \$4,203,182, PLUS INTEREST, TO ELIGIBLE CUSTOMERS THAT INCURRED EXCESS FEES DUE TO THEIR INVESTMENTS IN CLASS C SHARES. IN RESOLVING THIS MATTER WITHOUT A MONETARY FINE, FINRA RECOGNIZES THE FIRM'S EXTRAORDINARY COOPERATION.

Regulator Statement IN RESOLVING THIS MATTER WITHOUT A MONETARY FINE, FINRA RECOGNIZES THE FIRM'S EXTRAORDINARY COOPERATION. THE FIRM PROVIDED SUBSTANTIAL ASSISTANCE TO FINRA IN ITS INVESTIGATION, INCLUDING PROVIDING FINRA WITH DETAILED INFORMATION ABOUT THE CHALLENGES ASSOCIATED WITH COLLECTING AND ASSESSING DATA CONCERNING 529 PLANS. IN ADDITION, THE FIRM ENGAGED AN OUTSIDE CONSULTING FIRM TO CONDUCT A COMPLEX ANALYSIS TO IDENTIFY POTENTIALLY DISADVANTAGED CUSTOMERS ON AN EXPEDITED BASIS. THE FIRM THEN ESTABLISHED A PLAN TO PROVIDE BROAD REMEDIATION TO CUSTOMERS HARMED DURING THE RELEVANT PERIOD.



Reporting Source: Firm

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, AND FAILED TO ESTABLISH, MAINTAIN AND ENFORCE WSPS, REASONABLY DESIGNED TO SUPERVISE REPRESENTATIVES' SHARE-CLASS RECOMMENDATIONS TO CUSTOMERS OF 529 SAVINGS PLANS. THE FINDINGS STATED THAT THE MATTER INVOLVES THE FIRM'S RESPECTIVE FAILURE TO SUPERVISE ITS ACTIVITIES TO ACHIEVE COMPLIANCE WITH ITS SUITABILITY OBLIGATIONS IN CONNECTION WITH ITS REPRESENTATIVES' 529 PLAN SHARE-CLASS RECOMMENDATIONS. UNTIL 2016, THE FIRM'S TRAINING MATERIALS SIMILARLY DID NOT PROVIDE ANY GUIDANCE TO REPRESENTATIVES REGARDING 529 PLAN SHARE CLASSES. ALTHOUGH THE FIRM MAINTAINED AN AUTOMATED SURVEILLANCE SYSTEM DESIGNED TO GENERATE EXCEPTION REPORTS TO IDENTIFY POTENTIALLY UNSUITABLE 529 PLAN SHARE-CLASS RECOMMENDATIONS, IT DID NOT HAVE ANY SYSTEM OR PROCEDURES TO TEST THIS SYSTEM AND IT FAILED TO DETECT A BREAKDOWN IN THE SYSTEM. AS A RESULT, THE FIRM FAILED TO CONDUCT A SUPERVISORY REVIEW OF APPROXIMATELY 1.6 MILLION 529 PLAN PURCHASES. IN ADDITION, EVEN WHEN THE SYSTEM GENERATED REPORTS AS INTENDED, THE FIRM DID NOT CONSISTENTLY USE THE REPORTS AND TOOK NO ACTION WHEN A POTENTIALLY UNSUITABLE TRANSACTION WAS FLAGGED. THE FINDINGS ALSO STATED THAT THE FIRM HAS AGREED TO PAY RESTITUTION RELATING TO THE SALE OF CLASS C SHARES TO CERTAIN 529 PLAN CUSTOMERS IN THE ESTIMATED AMOUNT OF \$4,203,182.

Initiated By: FINRA

Date Initiated: 11/06/2019

Docket/Case Number: [2018058041101](#)

Principal Product Type: Other



Other Product Type(s):	SHARE CLASSES OF 529 SAVINGS PLANS
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	11/06/2019
Sanctions Ordered:	Censure Disgorgement/Restitution
Other Sanctions Ordered:	PLUS INTEREST
Sanction Details:	THE FIRM WAS CENSURED AND ORDERED TO PAY RESTITUTION IN THE ESTIMATED TOTAL AMOUNT OF \$4,203,182, PLUS INTEREST, TO ELIGIBLE CUSTOMERS THAT INCURRED EXCESS FEES DUE TO THEIR INVESTMENTS IN CLASS C SHARES. IN RESOLVING THIS MATTER WITHOUT A MONETARY FINE, FINRA RECOGNIZES THE FIRM'S EXTRAORDINARY COOPERATION
Firm Statement	IN RESOLVING THIS MATTER WITHOUT A MONETARY FINE, FINRA RECOGNIZES THE FIRM'S EXTRAORDINARY COOPERATION. THE FIRM PROVIDED SUBSTANTIAL ASSISTANCE TO FINRA IN ITS INVESTIGATION, INCLUDING PROVIDING FINRA WITH DETAILED INFORMATION ABOUT THE CHALLENGES ASSOCIATED WITH COLLECTING AND ASSESSING DATA CONCERNING 529 PLANS. IN ADDITION, THE FIRM ENGAGED AN OUTSIDE CONSULTING FIRM TO CONDUCT A COMPLEX ANALYSIS TO IDENTIFY POTENTIALLY DISADVANTAGED CUSTOMERS ON AN EXPEDITED BASIS. THE FIRM THEN ESTABLISHED A PLAN TO PROVIDE BROAD REMEDIATION TO CUSTOMERS HARMED DURING THE RELEVANT PERIOD.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	RAYMOND JAMES FINANCIAL SERVICES FAILED TO REASONABLY SUPERVISE ONE OF ITS ASSOCIATED PERSON, GARY DODDS (CRD #840109). DODDS ENGAGED IN EXCESSIVE TRADING AND MADE UNSUITABLE RECOMMENDATIONS TO HIS CLIENTS.



Initiated By:	OREGON DEPARTMENT OF CONSUMER AND BUSINESS SERVICES, DIVISION OF FINANCIAL REGULATION
Date Initiated:	02/28/2019
Docket/Case Number:	S-19-0019
URL for Regulatory Action:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	CIVIL PENALTY, RESTITUTION
Resolution:	Consent
Resolution Date:	08/24/2020
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 \$120,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ORDER TO CEASE AND DESIST; CIVIL PENALTY OF \$120,000 AND RESTITUTION OF \$123,379, FOR A TOTAL AMOUNT OF \$243,379.
Regulator Statement	RAYMOND JAMES FINANCIAL SERVICES FAILED TO REASONABLY SUPERVISE ONE OF ITS ASSOCIATED PERSON, GARY DODDS (CRD #840109). DODDS ENGAGED IN EXCESSIVE TRADING AND MADE UNSUITABLE RECOMMENDATIONS TO HIS CLIENTS.
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Reporting Source:	Firm
Current Status:	Final
Allegations:	THE DIVISION OF FINANCIAL REGULATION ("DIVISION"), ACTING ON BEHALF OF THE DIRECTOR OF THE DEPARTMENT OF CONSUMER AND BUSINESS SERVICES FOR THE STATE OF OREGON (THE "DIRECTOR"), ISSUED A "NOTICE ORDER" ALLEGING THAT RAYMOND JAMES FINANCIAL



SERVICES, INC. ("RJFS") VIOLATED OREGON ADMINISTRATIVE RULES 441-205-0210(1) AND (3) BY FAILING TO REASONABLY SUPERVISE GARY B. DODDS WHO THE DIVISION ALLEGED VIOLATED OREGON SECURITIES LAWS BY MAKING EXCESSIVE TRADES OR CHURNING AND MAKING UNSUITABLE RECOMMENDATIONS, AND BY FAILING TO REASONABLY SUPERVISE ORAN TEATER AND CLAYTON TRENZ WHO THE DIVISION ALSO ALLEGED VIOLATED OREGON SECURITIES LAWS BY FAILING TO REASONABLY SUPERVISE MR. DODDS (COLLECTIVELY, "RESPONDENTS"). THE DIVISION ALSO ALLEGED THAT RJFS VIOLATED OREGON REVISED STATUTES 59.451 AND 59.135(4) BY FILING A FALSE STATEMENT WITH THE DIVISION. PURSUANT TO THE NOTICE ORDER, RESPONDENTS ARE ORDERED TO CEASE AND DESIST FROM VIOLATING ORS 59.451, ORS 59.135, OAR 441-205-0140, AND OAR 441-205-0210, AND PROPOSED PENALTIES AGAINST RESPONDENTS ARE AS FOLLOWS: MR. DODD IS ASSESSED \$150,000; RJFS IS ASSESSED \$120,000; CLAY TRENZ IS ASSESSED \$20,000; AND ORAN TEATER IS ASSESSED \$20,000. ON JULY 23, 2020.

Initiated By:	OREGON DIVISION OF FINANCIAL REGULATION
Date Initiated:	09/30/2019
Docket/Case Number:	S-19-0019
Principal Product Type:	Other
Other Product Type(s):	EQUITY SECURITIES
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	CIVIL AND ADMINISTRATIVE PENALTY(IES)/FINE(S)
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	08/24/2020
Sanctions Ordered:	Monetary/Fine \$120,000.00
Other Sanctions Ordered:	CEASE AND DESIST
Sanction Details:	DISGORGEMENT OF COMMISSIONS EARNED TO FIVE (5) ACCOUNTS TOTALING \$123,379.00
Firm Statement	RJFS AND AT LEAST TWO OF THE OTHER RESPONDENTS HAVE FILED A NOTICE WITH THE DIVISION TO CONTEST THE ORDER.



Reporting Source: Regulator

Current Status: Final

Allegations: SEC ADMIN RELEASE 33-10689, 34-86985, IA RELEASE 40-5352 / SEPTEMBER 17, 2019:
THE SECURITIES AND EXCHANGE COMMISSION ("COMMISSION") DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS BE, AND HEREBY ARE, INSTITUTED PURSUANT TO SECTION 8A OF THE SECURITIES ACT OF 1933 ("SECURITIES ACT"), SECTION 15(B) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT"), AND SECTIONS 203(E) AND 203(K) OF THE INVESTMENT ADVISERS ACT OF 1940 ("ADVISERS ACT") AGAINST RAYMOND JAMES & ASSOCIATES, INC. ("RJA"), RAYMOND JAMES FINANCIAL SERVICES, INC. ("RJFS"), AND RAYMOND JAMES FINANCIAL SERVICES ADVISORS, INC. ("RJFSA" AND COLLECTIVELY "RAYMOND JAMES" OR "RESPONDENTS").
THE COMMISSION FINDS THAT AT VARIOUS TIMES, FROM AT LEAST JANUARY 2013 THROUGH MAY 2018 ("RELEVANT PERIOD"), RAYMOND JAMES ENGAGED IN SEVERAL VIOLATIONS. IN PARTICULAR, RJA AND RJFSA (COLLECTIVELY "RJ ADVISERS") FAILED TO CONDUCT PROMISED SUITABILITY REVIEWS FOR CERTAIN ADVISORY ACCOUNTS, DID NOT ADOPT POLICIES AND PROCEDURES REASONABLY DESIGNED TO PREVENT VIOLATIONS CONCERNING THE SUITABILITY OF FEE-BASED ADVISORY ACCOUNTS, AND OVERVALUED CERTAIN ASSETS THAT RESULTED IN CHARGING EXCESS ADVISORY FEES; AND RJA AND RJFS (COLLECTIVELY "RJ BROKERS") FAILED TO HAVE A REASONABLE BASIS FOR RECOMMENDING CERTAIN UNIT INVESTMENT TRUST ("UIT") TRANSACTIONS TO BROKERAGE CUSTOMERS, AND FAILED TO DISCLOSE THE CONFLICT OF INTEREST ASSOCIATED WITH EARNING GREATER COMPENSATION WHEN RECOMMENDING CERTAIN SECURITIES WITHOUT PROVIDING APPLICABLE SALES-LOAD DISCOUNTS TO BROKERAGE CUSTOMERS. THESE FAILURES INVOLVED PRODUCTS SOLD AND SERVICES PROVIDED TO RETAIL INVESTORS.
RJ ADVISERS' FORM ADV PART 2A BROCHURES ("BROCHURES") AND COMPLIANCE POLICIES AND PROCEDURES PROVIDED THAT THEY WOULD CONDUCT REVIEWS AT SPECIFIED INTERVALS TO DETERMINE IF ADVISORY ACCOUNTS REMAINED SUITABLE FOR CLIENTS OR IF THE CLIENTS' ASSETS SHOULD BE MOVED TO A BROKERAGE ACCOUNT. RJ ADVISERS, HOWEVER, FAILED TO TIMELY AND ADEQUATELY CONDUCT THESE REVIEWS. IN PARTICULAR, BETWEEN JANUARY 2013 AND SEPTEMBER 2017, RJ ADVISERS FAILED TO PROPERLY REVIEW 7,708 ADVISORY ACCOUNTS AFTER THEY HAD NO SECURITIES TRADING ACTIVITY FOR AT LEAST 12 MONTHS (THE "INACTIVE ACCOUNTS") AS REQUIRED BY ITS POLICIES AND PROCEDURES. THE INACTIVE ACCOUNTS PAID RJ ADVISERS APPROXIMATELY \$4.9 MILLION IN ADVISORY FEES.



RAYMOND JAMES ENGAGED IN ADDITIONAL VIOLATIONS THAT AFFECTED BOTH BROKERAGE CUSTOMERS AND ADVISORY CLIENTS WHO OWNED UITs. IN PARTICULAR, RJ BROKERS: (1) DID NOT HAVE A REASONABLE BASIS FOR RECOMMENDING THAT CERTAIN BROKERAGE CUSTOMERS SELL CERTAIN UIT POSITIONS PRIOR TO THEIR MATURITY DATES AND THEN REPURCHASE NEWLY-ISSUED UIT POSITIONS, WHICH GENERATED APPROXIMATELY \$5.5 MILLION IN EXCESS SALES CHARGES AND AFFECTED 2,044 BROKERAGE ACCOUNTS; AND (2) FAILED TO DISCLOSE THEIR CONFLICT OF INTEREST BY RECOMMENDING UITs WITHOUT APPLYING ALMOST \$660,000 IN APPLICABLE SALES-LOAD DISCOUNTS TO BROKERAGE CUSTOMERS IN 5,468 ELIGIBLE ACCOUNTS, FOR WHICH RJ BROKERS RECEIVED GREATER COMPENSATION. IN ADDITION, RJ ADVISERS USED INCORRECT UIT VALUATIONS TO CALCULATE MANAGEMENT FEES FOR CERTAIN ADVISORY CLIENTS, RESULTING IN APPROXIMATELY \$51,000 IN EXCESS ADVISORY FEES.

Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	09/17/2019
Docket/Case Number:	3-19464
Principal Product Type:	Unit Investment Trust(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	09/17/2019
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	Yes
Sanctions Ordered:	Censure Monetary/Fine \$3,000,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	IT IS ORDERED THAT RAYMOND JAMES FINANCIAL SERVICES, INC. ("RJFS")



IS CENSURED AND SHALL CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTIONS 17(A)(2) AND 17(A)(3) OF THE SECURITIES ACT.
RESPONDENTS SHALL, JOINTLY AND SEVERALLY, PAY DISGORGEMENT OF \$11,098,349.01 AND PREJUDGMENT INTEREST OF \$1,072,764.80.
RESPONDENTS SHALL, JOINTLY AND SEVERALLY, PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$3,000,000.

Regulator Statement

RESPONDENTS HAVE SUBMITTED AN OFFER OF SETTLEMENT (THE "OFFER") WHICH THE COMMISSION HAS DETERMINED TO ACCEPT. RAYMOND JAMES FINANCIAL SERVICES, INC. ("RJFS") WILLFULLY VIOLATED SECTIONS 17(A)(2) AND 17(A)(3) OF THE SECURITIES ACT. IT IS ORDERED THAT RJFS IS CENSURED AND SHALL CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTIONS 17(A)(2) AND 17(A)(3) OF THE SECURITIES ACT. RESPONDENTS SHALL, JOINTLY AND SEVERALLY, PAY DISGORGEMENT OF \$11,098,349.01 AND PREJUDGMENT INTEREST OF \$1,072,764.80. RESPONDENTS SHALL, JOINTLY AND SEVERALLY, PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$3,000,000.

Reporting Source:

Firm

Current Status:

Final

Allegations:

THE SECURITIES AND EXCHANGE COMMISSION ("SEC") ALLEGED THAT RAYMOND JAMES & ASSOCIATES, INC. ("RJA") AND RAYMOND JAMES FINANCIAL SERVICES ADVISORS, INC. ("RJFSA") VIOLATED SECTIONS 206(2) AND 206(4) OF THE INVESTMENT ADVISERS ACT OF 1940 ("ADVISERS ACT"), AND RULE 206(4)-7 THEREUNDER, BY FAILING TO CONDUCT PROMISED SUITABILITY REVIEWS FOR CERTAIN ADVISORY ACCOUNTS, FAILING TO ADOPT POLICIES AND PROCEDURES REASONABLY DESIGNED TO PREVENT VIOLATIONS CONCERNING THE SUITABILITY OF FEE-BASED ADVISORY ACCOUNTS, AND OVERVALUING CERTAIN ASSETS THAT RESULTED IN CHARGING EXCESS ADVISORY FEES. THE SEC ALSO ALLEGED THAT RJA AND RAYMOND JAMES FINANCIAL SERVICES, INC. ("RJFS") VIOLATED SECTIONS 17(A)(2) AND 17(A)(3) OF THE SECURITIES ACT OF 1933 ("SECURITIES ACT") BY FAILING TO HAVE A REASONABLE BASIS FOR RECOMMENDING CERTAIN UNIT INVESTMENT TRUST TRANSACTIONS TO BROKERAGE CUSTOMERS, AND FAILING TO DISCLOSE THE CONFLICT OF INTEREST ASSOCIATED WITH EARNING GREATER COMPENSATION WHEN RECOMMENDING CERTAIN SECURITIES WITHOUT PROVIDING APPLICABLE SALES-LOAD DISCOUNTS TO BROKERAGE CUSTOMERS

Initiated By:

UNITED STATES SECURITIES AND EXCHANGE COMMISSION



Date Initiated:	09/17/2019
Docket/Case Number:	3-19464
Principal Product Type:	Unit Investment Trust(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	CENSURED, DISGORGEMENT, AND CIVIL MONEY PENALTY.
Resolution:	Order
Resolution Date:	09/17/2019
Sanctions Ordered:	Censure Monetary/Fine \$3,000,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	"IN THE ORDER, RJA, RJFS, AND RJFSA WERE CENSURED, REQUIRED TO PAY A CIVIL MONETARY PENALTY OF \$3,000,000, WHICH WAS PAID ON 09/25/2019, AND REQUIRED TO PAY DISGORGEMENT OF \$11,098,349.01. DISGORGEMENT PAID TO OPEN ACCOUNTS ON 9/9 AND CLOSED ACCOUNTS ON 9/16.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, RJA, RJFS, AND RJFSA CONSENTED TO THE ENTRY BY THE SEC OF AN ORDER INSTITUTING ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS, PURSUANT TO SECTION 8A OF THE SECURITIES ACT, SECTION 15(B) OF THE SECURITIES EXCHANGE ACT OF 1934, AND SECTIONS 203(E) AND 203(K) OF THE ADVISERS ACT, MAKING FINDINGS, AND IMPOSING REMEDIAL SANCTIONS AND A CEASE-AND-DESIST ORDER ("ORDER") (RELEASE NO. 86985, SEPT. 17, 2019). PURSUANT TO THE ORDER RJA AND RJFS MUST CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTIONS 17(A)(2) AND 17(A)(3) OF THE SECURITIES ACT; RJA AND RJFSA MUST CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS ANY FUTURE VIOLATIONS OF SECTIONS 206(2) AND 206(4) OF THE ADVISERS ACT AND RULE 206(4)-7 PROMULGATED THEREUNDER. ALSO PURSUANT TO THE ORDER, RJA, RJFS, AND RJFSA WERE CENSURED AND MUST PAY DISGORGEMENT, PREJUDMENT INTEREST AND A CIVIL MONEY PENALTY TOTALING \$15,171,113.81. IN DETERMINING TO ACCEPT RAYMOND JAMES' OFFER OF A SETTLEMENT, THE SEC TOOK INTO CONSIDERATION CERTAIN REMEDIAL EFFORTS PROMPTLY TAKEN BY, AND THE COOPERATION OF, RAYMOND



JAMES.

Disclosure 49 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	THE FIRM EMPLOYED JEFFREY SCOTT INGROS (CRD #2091822) AS REPRESENTATIVE, SUPERVISING PRINCIPAL AND BRANCH OFFICE MANAGER OF THE FIRM'S OFFICE IN BEAVER, PA. THE PENNSYLVANIA DEPARTMENT OF BANKING AND SECURITIES (THE DEPARTMENT) CONDUCTED AN EXAMINATION AND INVESTIGATION OF THE FIRM'S OFFICE IN BEAVER, PA. THE EXAMINATION AND INVESTIGATION INCLUDED RECEIPT OF EVIDENCE THAT INGROS ACCEPTED LOANS FROM CUSTOMERS WITHOUT PRIOR APPROVAL FROM THE FIRM AND FAILED TO DISCLOSE THE LOANS ON ANNUAL COMPLIANCE ATTESTATIONS THROUGHOUT THE COURSE OF HIS REGISTRATION WITH THE FIRM. THE DEPARTMENT'S INVESTIGATION AND EXAMINATION CONFIRMED, AMONG OTHER ISSUES AND DEFICIENCIES, THAT THE FIRM'S SUPERVISORY PRACTICES DID NOT FLAG AND IDENTIFY THAT INGROS WAS ACCEPTING LOANS FROM CUSTOMERS DURING THE COURSE OF HIS REGISTRATION WITH THE FIRM. PER THE APPLICABLE SECTIONS OF THE PENNSYLVANIA SECURITIES ACT OF 1972, THE FIRM FAILED TO REASONABLY SUPERVISE AN AGENT OF THE FIRM.
Initiated By:	PENNSYLVANIA DEPARTMENT OF BANKING AND SECURITIES, COUNSEL CAROLYN MENDELSON, 412.565.7519
Date Initiated:	12/21/2017
Docket/Case Number:	170078
URL for Regulatory Action:	
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:	PAYMENT OF LEGAL AND INVESTIGATIVE COSTS.
Resolution:	Other
Resolution Date:	12/21/2017



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 \$125,000.00

Other Sanctions Ordered: 1. PAY LEGAL AND INVESTIGATIVE COSTS IN THE AMOUNT OF \$25,000. 2. COMPLY WITH THE PENNSYLVANIA SECURITIES ACT OF 1972.

Sanction Details: THE AMOUNTS REFERENCED IN ITEMS 13A AND 13B, RESPECTIVELY, ARE TO BE PAID WITHIN TEN DAYS OF THE EFFECTIVE DATE OF THIS ORDER.

Regulator Statement PER ITEM 10, THE MATTER WAS RESOLVED VIA CONSENT AGREEMENT AND ORDER (CAO). THE FIRM, IN LIEU OF LITIGATION, AND NEITHER ADMITTING NOR DENYING THE ALLEGATIONS HEREIN, AND INTENDING TO BE LEGALLY BOUND, HEREBY AGREES TO THE TERMS OF THIS CONSENT AGREEMENT AND ORDER (CAO).

Reporting Source: Firm

Current Status: Final

Allegations: JEFFREY SCOTT INGROS (CRD #2091822) A REPRESENTATIVE, SUPERVISING PRINCIPAL AND BRANCH OFFICE MANAGER REGISTERED WITH THE FIRM'S OFFICE IN BEAVER, PA. THE PENNSYLVANIA DEPARTMENT OF BANKING AND SECURITIES (THE DEPARTMENT) CONDUCTED AN EXAMINATION AND INVESTIGATION OF THE FIRM'S OFFICE IN BEAVER, PA. THE EXAMINATION AND INVESTIGATION INCLUDED RECEIPT OF EVIDENCE THAT INGROS ACCEPTED LOANS FROM CUSTOMERS WITHOUT PRIOR APPROVAL FROM THE FIRM AND FAILED TO DISCLOSE THE LOANS ON ANNUAL COMPLIANCE ATTESTATIONS THROUGHOUT THE COURSE OF HIS REGISTRATION WITH THE FIRM. THE DEPARTMENT'S INVESTIGATION AND EXAMINATION CONFIRMED, AMONG OTHER ISSUES AND DEFICIENCIES, THAT THE FIRM'S SUPERVISORY PRACTICES DID NOT FLAG AND IDENTIFY THAT INGROS WAS ACCEPTING LOANS FROM CUSTOMERS DURING THE COURSE OF HIS REGISTRATION WITH THE FIRM. PER THE APPLICABLE SECTIONS OF THE PENNSYLVANIA SECURITIES ACT OF 1972, THE FIRM FAILED TO REASONABLY SUPERVISE AN AGENT OF THE FIRM.

Initiated By: PENNSYLVANIA DEPARTMENT OF BANKING AND SECURITIES, COUNSEL CAROLYN MENDELSON, 412.565.7519

Date Initiated: 12/21/2017



Docket/Case Number:	170078
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:	PAYMENT OF LEGAL AND INVESTIGATIVE COSTS.
Resolution:	Other
Resolution Date:	12/21/2017
Sanctions Ordered:	Monetary/Fine \$125,000.00
Other Sanctions Ordered:	PAY LEGAL AND INVESTIGATIVE COSTS IN THE AMOUNT OF \$25,000.
Sanction Details:	COMPLY WITH THE PENNSYLVANIA SECURITIES ACT OF 1972. THE AMOUNTS REFERENCED IN ITEMS 13A AND 13B, RESPECTIVELY, ARE TO BE PAID WITHIN TEN DAYS OF THE EFFECTIVE DATE OF THE ORDER.
Firm Statement	PER ITEM 10, THE MATTER WAS RESOLVED VIA CONSENT AGREEMENT AND ORDER (CAO). THE FIRM, IN LIEU OF LITIGATION, AND NEITHER ADMITTING NOR DENYING THE ALLEGATIONS HEREIN, AND INTENDING TO BE LEGALLY BOUND, HEREBY AGREES TO THE TERMS OF THIS CONSENT AGREEMENT AND ORDER (CAO).

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT DID NOT HAVE SUPERVISORY SYSTEMS AND PROCEDURES FOR REVIEWING EMAIL COMMUNICATIONS THAT WERE REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE LEGAL REQUIREMENTS OR APPROPRIATE FOR THE FIRM'S BUSINESS, SIZE, STRUCTURE, AND CUSTOMERS. THE FINDINGS STATED THAT DURING THE RELEVANT PERIOD, THE FIRM RELIED PRIMARILY ON AN AUTOMATED, LEXICON-BASED SYSTEM TO SURVEIL THE EMAILS OF ITS PERSONNEL. THE SYSTEM ALLOWED THE FIRM TO SELECT FROM AND CUSTOMIZE VARIOUS "POLICIES" DESIGNED TO "FLAG" EMAILS THAT CONTAINED SPECIFIED WORDS, PHRASES, OR OTHER CHARACTERISTICS SUGGESTING POTENTIAL CONCERNS WARRANTING FURTHER REVIEW. FLAGGED EMAILS WERE THEN



REVIEWED BY A TEAM OF REGISTERED PRINCIPALS IN THE FIRM'S HOME OFFICE. THIS SYSTEM WAS FLAWED IN SIGNIFICANT RESPECTS. THE PRIMARY LEXICON USED BY THE FIRM'S SYSTEM WAS NOT REASONABLY DESIGNED TO IDENTIFY EMAILS SUGGESTING CERTAIN CATEGORIES OF POTENTIALLY PROBLEMATIC CONDUCT AND CIRCUMSTANCES THAT THE FIRM-IN LIGHT OF ITS SIZE, STRUCTURE, BUSINESS MODEL, AND EXPERIENCE FROM PRIOR DISCIPLINARY ACTIONS TAKEN AGAINST ITS PERSONNEL BY BOTH THE FIRM AND REGULATORS-KNEW OR SHOULD HAVE ANTICIPATED WOULD RECUR FROM TIME TO TIME. THE FIRM ALSO FAILED TO DEVOTE ADEQUATE PERSONNEL AND RESOURCES TO THE TEAM THAT REVIEWED EMAILS FLAGGED BY THE SYSTEM, EVEN AS THE NUMBER OF EMAILS SENT OR RECEIVED BY THE FIRM INCREASED OVER TIME. IN ADDITION, THE FIRM UNREASONABLY FAILED TO APPLY ALL OF THE POLICIES IN THE FIRM'S PRIMARY LEXICON TO THE EMAILS OF APPROXIMATELY 1,300 REGISTERED REPRESENTATIVES WHO WORKED IN BRANCH OFFICES THAT MAINTAINED THEIR OWN EMAIL SERVERS. THE FIRM ALSO UNREASONABLY EXCLUDED FROM EMAIL SURVEILLANCE CERTAIN FIRM PERSONNEL WHO SENT OR RECEIVED EMAILS THAT REQUIRED REVIEW, INCLUDING PERSONNEL IN ITS HEADQUARTERS WHO SERVICED CUSTOMER BROKERAGE ACCOUNTS IN ADDITION TO THEIR OTHER RESPONSIBILITIES. THE FIRM DID NOT PERIODICALLY TEST THE CONFIGURATION AND EFFECTIVENESS OF ITS LEXICON-BASED EMAIL SURVEILLANCE SYSTEM AND LACKED REASONABLE PROCEDURES FOR DOING SO. SEPARATE FROM THE AUTOMATED, LEXICON-BASED SURVEILLANCE SYSTEM, THE FIRM ALSO REQUIRED AND TRAINED ITS BRANCH MANAGERS TO MANUALLY REVIEW EMAILS SENT AND RECEIVED BY THE REGISTERED REPRESENTATIVES THEY SUPERVISED AND RETAIN EVIDENCE OF THAT REVIEW EITHER ELECTRONICALLY OR IN HARD COPY. THIS MANUAL REVIEW PROCESS, HOWEVER, WAS ESSENTIALLY BASED ON AN "HONOR SYSTEM" WHEREBY SUPERVISED REPRESENTATIVES SELF-SELECTED AND COPIED, BLIND COPIED, OR FORWARDED EMAILS FOR REVIEW, WITH NO EFFECTIVE MEANS TO ENSURE THAT REPRESENTATIVES WERE IN FACT PROVIDING ALL EMAILS THAT SHOULD HAVE BEEN REVIEWED. MOREOVER, WHEN BRANCH MANAGERS LEFT THE FIRM, THE FIRM DID NOT RETAIN THE ELECTRONIC RECORDS EVIDENCING WHICH EMAILS THEY HAD REVIEWED. THE FIRM DISCONTINUED ITS MANUAL EMAIL REVIEW BY BRANCH MANAGERS IN JANUARY 2013, BUT FAILED TO REEVALUATE THE ADEQUACY OF ITS PRIMARY EMAIL REVIEW LEXICON WHEN IT DID SO. THE FOREGOING COMBINATION OF FAILURES ALLOWED MILLIONS OF FIRM EMAILS TO EVADE MEANINGFUL REVIEW, CREATING UNREASONABLE RISK THAT MISCONDUCT BY FIRM PERSONNEL MIGHT BE OCCURRING UNDETECTED. THE FAILURES CONTRIBUTED TO THE FIRM NOT DETECTING THAT A FORMER FIRM REPRESENTATIVE HAD ENGAGED IN PRIVATE SECURITIES TRANSACTIONS INVOLVING THE FRAUDULENT SALE OF APPROXIMATELY



\$1 MILLION IN UNREGISTERED NOTES, RESULTING IN SUBSTANTIAL LOSSES TO SOME OF HIS CUSTOMERS. AT LEAST 16 SEPARATE STRINGS CONTAINED EVIDENCE THAT, IF REVIEWED BY THE REPRESENTATIVE'S BRANCH MANAGER, COULD HAVE INDICATED THAT THE REPRESENTATIVE WAS IMPROPERLY SELLING THE INVESTMENT AWAY FROM THE FIRM'S SUPERVISION. APPROXIMATELY TWO YEARS AFTER THE LAST CUSTOMER HAD ALREADY INVESTED, TWO RELEVANT EMAIL STRINGS WERE FLAGGED BY THE FIRM'S LEXICON-BASED SURVEILLANCE SYSTEM, BUT THE FIRM FAILED TO DETECT THE MISCONDUCT.

Initiated By: FINRA

Date Initiated: 12/21/2017

Docket/Case Number: [2013036343601](#)

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: 12/21/2017

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 \$2,000,000.00

Other Sanctions Ordered: UNDERTAKINGS

Sanction Details: THE FIRM WAS CENSURED, FINED \$2 MILLION AND UNDERTAKES TO CERTIFY IN WRITING TO FINRA THAT IT HAS ADOPTED AND IMPLEMENTED WRITTEN SUPERVISORY POLICIES, PROCEDURES, AND SYSTEMS INCLUDING, IF UTILIZED, AN APPROPRIATE EMAIL REVIEW LEXICON, THAT ARE REASONABLY DESIGNED TO ADDRESS EACH OF THE DEFICIENCIES IDENTIFIED IN THIS AWC AND THAT IT HAS (I) COMPLETED A RISK-BASED RETROSPECTIVE REVIEW, WHICH MAY INCLUDE THE USE OF SAMPLING, REASONABLY DESIGNED TO DETECT POTENTIAL VIOLATIONS OF THE SECURITIES LAWS AND FINRA RULES EVIDENCED IN EMAILS SENT OR



RECEIVED BY ITS REGISTERED REPRESENTATIVES THAT WERE IMPACTED BY THE SYSTEMIC FAILURES DESCRIBED ABOVE; AND HAS (II) COMPLIED WITH ITS FORM U4, FORM U5, AND RULE 4530 REPORTING OBLIGATIONS AS A RESULT OF ITS FINDINGS ARISING OUT OF THAT REVIEW. FINES PAID IN FULL ON DECEMBER 28, 2017.

Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>WITHOUT ADMITTING OR DENYING FINRA'S FINDINGS, RAYMOND JAMES FINANCIAL SERVICES ("RJFS" OR "FIRM") CONSENTED TO THE SANCTIONS IMPOSED BY FINRA AND TO THE ENTRY OF FINDINGS THAT, BETWEEN DECEMBER 2007 AND SEPTEMBER 2017, RJFS DID NOT HAVE SUPERVISORY SYSTEMS AND PROCESS FOR REVIEWING EMAIL COMMUNICATIONS THAT WERE REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE LEGAL REQUIREMENTS OR APPROPRIATE FOR THE FIRM'S BUSINESS, SIZE, STRUCTURE AND CUSTOMERS, AS A RESULT, FINRA FOUND THAT RJFS VIOLATED NASD RULES 3010 AND 2110 AND FINRA RULES 3110 AND 2010.</p> <p>IN PARTICULAR, FINRA FOUND THAT (1) THE FIRMS' AUTOMATED LEXICON-BASED SYSTEM TO SURVEIL THE E-MAILS OF ITS PERSONNEL WAS FLAWED IN SIGNIFICANT RESPECTS, (2) THE FIRM FAILED TO DEVOTE ADEQUATE PERSONNEL AND RESOURCES TO THE TEAM THAT REVIEWED E-MAILS, (3) THE FIRM FAILED TO APPLY ALL OF ITS POLICIES IN ITS PRIMARY LEXICON TO BRANCH OFFICES THAT HAD THEIR OWN EMAIL SERVERS, AND (4) THE FIRM DID NOT PERIODICALLY TEST THE CONFIGURATION AND EFFECTIVENESS OF ITS EMAIL SURVEILLANCE SYSTEM. THE FIRM WAS CENSURED, FINED \$2 MILLION, AND AGREED TO CERTAIN UNDERTAKINGS TO ADDRESS THE IDENTIFIED DEFICIENCIES.</p>
Initiated By:	FINRA
Date Initiated:	12/21/2017
Docket/Case Number:	2013036343601
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:	12/21/2017
Sanctions Ordered:	Censure Monetary/Fine \$2,000,000.00
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	THE FIRM WAS CENSURED, FINED \$2 MILLION AND UNDERTAKES TO CERTIFY IN WRITING TO FINRA THAT IT HAS ADOPTED AND IMPLEMENTED WRITTEN SUPERVISORY POLICIES, PROCEDURES, AND SYSTEMS INCLUDING, IF UTILIZED, AN APPROPRIATE EMAIL REVIEW LEXICON, THAT ARE REASONABLY DESIGNED TO ADDRESS EACH OF THE DEFICIENCIES IDENTIFIED IN THIS AWC AND THAT IT HAS (I) COMPLETED A RISK-BASED RETROSPECTIVE REVIEW, WHICH MAY INCLUDE THE USE OF SAMPLING, REASONABLY DESIGNED TO DETECT POTENTIAL VIOLATIONS OF THE SECURITIES LAWS AND FINRA RULES EVIDENCED IN EMAILS SENT OR RECEIVED BY ITS REGISTERED REPRESENTATIVES THAT WERE IMPACTED BY THE SYSTEMIC FAILURES DESCRIBED ABOVE; AND HAS (II) COMPLIED WITH ITS FORM U4, FORM U5, AND RULE 4530 REPORTING OBLIGATIONS AS A RESULT OF ITS FINDINGS ARISING OUT OF THAT REVIEW.

Disclosure 51 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO ESTABLISH AND IMPLEMENT POLICIES AND PROCEDURES TO REASONABLY DETECT AND CAUSE THE REPORTING OF SUSPICIOUS TRANSACTIONS. THE FINDINGS STATED THAT DESPITE THE SEPARATE AML DEPARTMENTS AND PROGRAMS, THE FIRM'S CLEARING FIRM AND THE CLEARING FIRM'S AMLCO, AS WELL AS THE FIRM CREATED A SYSTEM UNDER WHICH THE FIRM HEAVILY RELIED UPON ITS CLEARING FIRM TO PROVIDE CERTAIN SYSTEMS AND TOOLS AS PART OF THE FIRM'S AML PROGRAM. THE CLEARING FIRM'S AMLCO, WAS RESPONSIBLE FOR ENSURING THAT THE CLEARING FIRM'S AML PROGRAM WAS ADEQUATELY TAILORED TO THE CLEARING FIRM'S BUSINESS AND FOR APPROPRIATELY MONITORING, DETECTING AND REPORTING SUSPICIOUS ACTIVITY. THE FIRM FAILED TO COMMIT ADEQUATE RESOURCES TO THE FIRM'S AML PROGRAMS. THE FIRM'S STAFFING OF ITS AML DEPARTMENTS WAS INADEQUATE IN LIGHT OF THE EXTENSIVE RESPONSIBILITIES ASSIGNED TO THE FEW INDIVIDUALS, INCLUDING THE LABOR-INTENSIVE MANUAL REVIEWS, PARTICULARLY IN LIGHT OF THE FIRM'S GROWTH. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH AND



IMPLEMENT AML PROCEDURES AND SYSTEMS REASONABLY EXPECTED TO DETECT SUSPICIOUS ACTIVITY. THE FIRM FAILED TO ESTABLISH REASONABLE WRITTEN PROCEDURES FOR CERTAIN ASPECTS OF THE FIRM'S AML PROGRAMS. THE FIRM FAILED TO ESTABLISH REASONABLE AML SYSTEMS TAILORED TO ITS BUSINESS. THE AML PROCEDURES THAT WERE IN PLACE REQUIRED THE FIRM TO REVIEW ACCOUNTS FOR POTENTIAL SUSPICIOUS ACTIVITY. THE FIRM, HOWEVER, FAILED TO DEVELOP AND IMPLEMENT SURVEILLANCE REPORTS TAILORED TO DETECT CERTAIN TYPES OF POTENTIALLY SUSPICIOUS TRANSACTIONS. FOR EXAMPLE, THE FIRM HAD NO WRITTEN PROCEDURES REQUIRING REVIEW OF, OR SURVEILLANCE REPORTS MONITORING FOR, THE FOLLOWING HIGH-RISK ACTIVITIES: TRANSFERS OF FUNDS TO UNRELATED ACCOUNTS WITHOUT ANY APPARENT BUSINESS PURPOSE; JOURNALING SECURITIES AND CASH BETWEEN UNRELATED ACCOUNTS FOR NO APPARENT BUSINESS PURPOSE, PARTICULARLY INTERNAL TRANSFERS OF CASH FROM CUSTOMER ACCOUNTS TO EMPLOYEE OR EMPLOYEE-RELATED ACCOUNTS; AND MOVEMENT OF FUNDS, BY WIRE TRANSFER OR OTHERWISE, FROM MULTIPLE ACCOUNTS TO THE SAME THIRD PARTY ACCOUNT. THE FIRM'S SURVEILLANCE REPORTS FAILED TO REASONABLY MONITOR FOR SUSPICIOUS ACTIVITY. THE FINDINGS ALSO INCLUDED THAT THE FIRM FAILED TO REASONABLY INVESTIGATE RED FLAGS. AS A RESULT OF THE FIRM'S AML PROCEDURES, THE FIRM HAD GAPS IN ITS SURVEILLANCE OF ACTIVITY FOR AML RED FLAGS. EVEN WHEN THE EXCEPTION REPORTS OR OTHER SURVEILLANCE IDENTIFIED RED FLAGS, THE FIRM FAILED TO REASONABLY INVESTIGATE MANY INSTANCES IN ORDER TO DETERMINE WHETHER A SAR SHOULD BE FILED. ALSO, ALTHOUGH THE FIRM AML ANALYSTS IDENTIFIED SOME RED FLAGS AND OPENED INVESTIGATIONS, THE INVESTIGATIONS WERE DEFICIENT. FINRA FOUND THAT THE FIRM FAILED TO MAINTAIN REASONABLE WSPS RELATED TO JOURNALING SECURITIES BETWEEN CUSTOMER ACCOUNTS AND EMPLOYEE-RELATED ACCOUNTS. AS A RESULT, A BRANCH MANAGER FAILED TO DETECT THAT THE FIRM'S REGISTERED PERSON CONVERTED APPROXIMATELY \$1 MILLION FROM AN ELDERLY CUSTOMER TO HER OWN USE. THE FIRM ALSO FAILED TO ESTABLISH, MAINTAIN AND ENFORCE PROCEDURES TO PRESERVE LETTERS SENT TO CUSTOMERS CONFIRMING MOVEMENTS OF STOCK VALUED OVER \$50,000 FROM THE FIRM'S ACCOUNTS TO THIRD-PARTY ACCOUNTS AT THE FIRM FOR THE REQUIRED PERIOD OF TIME. FINRA ALSO FOUND THAT THE FIRM FAILED TO ESTABLISH AND MAINTAIN AN ADEQUATE CUSTOMER IDENTIFICATION PROGRAM. IN ADDITION, FINRA DETERMINED THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH SECTION 5 OF THE SECURITIES ACT THROUGH INCOMPLETE RISK REVIEWS, DUE DILIGENCE FAILURES, AND FAILURES TO IMPLEMENT EXISTING PROCEDURES RELEVANT TO LOW PRICED SECURITIES. MOREOVER,



FINRA FOUND THAT THE FIRM FAILED TO MAINTAIN AND UPDATE CERTAIN WSPS RELATED TO VARIABLE ANNUITY TRANSACTIONS.

Initiated By:	FINRA
Date Initiated:	05/18/2016
Docket/Case Number:	2014043592001
Principal Product Type:	Annuity(ies) - Variable
Other Product Type(s):	LOW PRICED SECURITIES
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	05/18/2016
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 \$9,000,000.00
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	THE FIRM WAS CENSURED, FINED \$9,000,000 AND REQUIRED TO CONDUCT A COMPREHENSIVE REVIEW OF THE ADEQUACY OF ITS AML AND SUPERVISORY POLICIES, SYSTEMS, PROCEDURES, AND TRAINING. AT THE CONCLUSION OF THE REVIEW, WHICH SHALL BE NO MORE THAN 180 DAYS AFTER THE DATE OF THE NOTICE OF ACCEPTANCE OF THIS AWC, THE FIRM SHALL CERTIFY THAT ITS PROCEDURES ARE REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH FINRA RULE 3310. THE CERTIFICATION SHALL BE PROVIDED IN A WRITTEN LETTER TO FINRA. THE LETTER SHALL BE ACCOMPANIED BY A WRITTEN REPORT, AT A MINIMUM, STATING (I) THE ADEQUACY OF THE FIRM'S POLICIES, SYSTEMS, PROCEDURES AND TRAINING RELATING TO AML AND SUPERVISION; (II) A DESCRIPTION OF THE REVIEW PERFORMED AND THE CONCLUSIONS REACHED; AND (III) RECOMMENDATIONS FOR MODIFICATIONS AND ADDITIONS TO THE FIRM'S POLICIES, SYSTEMS, PROCEDURES AND TRAINING.



FINE PAID IN FULL ON MAY 26, 2016.

Reporting Source:

Firm

Current Status:

Final

Allegations:

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO ESTABLISH AND IMPLEMENT POLICIES AND PROCEDURES TO REASONABLY DETECT AND CAUSE THE REPORTING OF SUSPICIOUS TRANSACTIONS. THE FINDINGS STATED THAT DESPITE THE SEPARATE AML DEPARTMENTS AND PROGRAMS, THE FIRM'S CLEARING FIRM AND THE CLEARING FIRM'S AMLCO, AS WELL AS THE FIRM CREATED A SYSTEM UNDER WHICH THE FIRM HEAVILY RELIED UPON ITS CLEARING FIRM TO PROVIDE CERTAIN SYSTEMS AND TOOLS AS PART OF THE FIRM'S AML PROGRAM. THE CLEARING FIRM'S AMLCO, WAS RESPONSIBLE FOR ENSURING THAT THE CLEARING FIRM'S AML PROGRAM WAS ADEQUATELY TAILORED TO THE CLEARING FIRM'S BUSINESS AND FOR APPROPRIATELY MONITORING, DETECTING AND REPORTING SUSPICIOUS ACTIVITY. THE FIRM FAILED TO COMMIT ADEQUATE RESOURCES TO THE FIRM'S AML PROGRAMS. THE FIRM'S STAFFING OF ITS AML DEPARTMENTS WAS INADEQUATE IN LIGHT OF THE EXTENSIVE RESPONSIBILITIES ASSIGNED TO THE FEW INDIVIDUALS, INCLUDING THE LABOR-INTENSIVE MANUAL REVIEWS, PARTICULARLY IN LIGHT OF THE FIRM'S GROWTH. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH AND IMPLEMENT AML PROCEDURES AND SYSTEMS REASONABLY EXPECTED TO DETECT SUSPICIOUS ACTIVITY. THE FIRM FAILED TO ESTABLISH REASONABLE WRITTEN PROCEDURES FOR CERTAIN ASPECTS OF THE FIRM'S AML PROGRAMS. THE FIRM FAILED TO ESTABLISH REASONABLE AML SYSTEMS TAILORED TO ITS BUSINESS. THE AML PROCEDURES THAT WERE IN PLACE REQUIRED THE FIRM TO REVIEW ACCOUNTS FOR POTENTIAL SUSPICIOUS ACTIVITY. THE FIRM, HOWEVER, FAILED TO DEVELOP AND IMPLEMENT SURVEILLANCE REPORTS TAILORED TO DETECT CERTAIN TYPES OF POTENTIALLY SUSPICIOUS TRANSACTIONS. FOR EXAMPLE, THE FIRM HAD NO WRITTEN PROCEDURES REQUIRING REVIEW OF, OR SURVEILLANCE REPORTS MONITORING FOR, THE FOLLOWING HIGH-RISK ACTIVITIES: TRANSFERS OF FUNDS TO UNRELATED ACCOUNTS WITHOUT ANY APPARENT BUSINESS PURPOSE; JOURNALING SECURITIES AND CASH BETWEEN UNRELATED ACCOUNTS FOR NO APPARENT BUSINESS PURPOSE, PARTICULARLY INTERNAL TRANSFERS OF CASH FROM CUSTOMER ACCOUNTS TO EMPLOYEE OR EMPLOYEE-RELATED ACCOUNTS; AND MOVEMENT OF FUNDS, BY WIRE TRANSFER OR OTHERWISE, FROM MULTIPLE ACCOUNTS TO THE SAME THIRD PARTY ACCOUNT. THE FIRM'S SURVEILLANCE REPORTS FAILED TO REASONABLY MONITOR FOR SUSPICIOUS ACTIVITY. THE FINDINGS ALSO



INCLUDED THAT THE FIRM FAILED TO REASONABLY INVESTIGATE RED FLAGS. AS A RESULT OF THE FIRM'S AML PROCEDURES, THE FIRM HAD GAPS IN ITS SURVEILLANCE OF ACTIVITY FOR AML RED FLAGS. EVEN WHEN THE EXCEPTION REPORTS OR OTHER SURVEILLANCE IDENTIFIED RED FLAGS, THE FIRM FAILED TO REASONABLY INVESTIGATE MANY INSTANCES IN ORDER TO DETERMINE WHETHER A SAR SHOULD BE FILED. ALSO, ALTHOUGH THE FIRM AML ANALYSTS IDENTIFIED SOME RED FLAGS AND OPENED INVESTIGATIONS, THE INVESTIGATIONS WERE DEFICIENT. FINRA FOUND THAT THE FIRM FAILED TO MAINTAIN REASONABLE WSPS RELATED TO JOURNALING SECURITIES BETWEEN CUSTOMER ACCOUNTS AND EMPLOYEE-RELATED ACCOUNTS. AS A RESULT, A BRANCH MANAGER FAILED TO DETECT THAT THE FIRM'S REGISTERED PERSON CONVERTED APPROXIMATELY \$1 MILLION FROM AN ELDERLY CUSTOMER TO HER OWN USE. THE FIRM ALSO FAILED TO ESTABLISH, MAINTAIN AND ENFORCE PROCEDURES TO PRESERVE LETTERS SENT TO CUSTOMERS CONFIRMING MOVEMENTS OF STOCK VALUED OVER \$50,000 FROM THE FIRM'S ACCOUNTS TO THIRD-PARTY ACCOUNTS AT THE FIRM FOR THE REQUIRED PERIOD OF TIME. FINRA ALSO FOUND THAT THE FIRM FAILED TO ESTABLISH AND MAINTAIN AN ADEQUATE CUSTOMER IDENTIFICATION PROGRAM. IN ADDITION, FINRA DETERMINED THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH SECTION 5 OF THE SECURITIES ACT THROUGH INCOMPLETE RISK REVIEWS, DUE DILIGENCE FAILURES, AND FAILURES TO IMPLEMENT EXISTING PROCEDURES RELEVANT TO LOW PRICED SECURITIES. MOREOVER, FINRA FOUND THAT THE FIRM FAILED TO MAINTAIN AND UPDATE CERTAIN WSPS RELATED TO VARIABLE ANNUITY TRANSACTIONS.

Initiated By: FINRA

Date Initiated: 05/18/2016

Docket/Case Number: [2014043592001](#)

Principal Product Type: Annuity(ies) - Variable

Other Product Type(s): LOW PRICED SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 05/18/2016

Sanctions Ordered: Censure
Monetary/Fine \$9,000,000.00



Other Sanctions Ordered: UNDERTAKING

Sanction Details: THE FIRM WAS CENSURED, FINED \$9,000,000 AND REQUIRED TO CONDUCT A COMPREHENSIVE REVIEW OF THE ADEQUACY OF ITS AML AND SUPERVISORY POLICIES, SYSTEMS, PROCEDURES, AND TRAINING. AT THE CONCLUSION OF THE REVIEW, WHICH SHALL BE NO MORE THAN 180 DAYS AFTER THE DATE OF THE NOTICE OF ACCEPTANCE OF THIS AWC, THE FIRM SHALL CERTIFY THAT ITS PROCEDURES ARE REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH FINRA RULE 3310. THE CERTIFICATION SHALL BE PROVIDED IN A WRITTEN LETTER TO FINRA. THE LETTER SHALL BE ACCOMPANIED BY A WRITTEN REPORT, AT A MINIMUM, STATING (I) THE ADEQUACY OF THE FIRM'S POLICIES, SYSTEMS, PROCEDURES AND TRAINING RELATING TO AML AND SUPERVISION; (II) A DESCRIPTION OF THE REVIEW PERFORMED AND THE CONCLUSIONS REACHED; AND (III) RECOMMENDATIONS FOR MODIFICATIONS AND ADDITIONS TO THE FIRM'S POLICIES, SYSTEMS, PROCEDURES AND TRAINING.

Disclosure 52 of 128

Reporting Source: Regulator

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT CAUSED CERTAIN NEWLY-RECRUITED REGISTERED REPRESENTATIVES FROM OTHER BROKERAGE FIRMS TO DISCLOSE CUSTOMER NONPUBLIC PERSONAL INFORMATION TO IT IN VIOLATION OF REGULATION S-P UNDER THE SECURITIES EXCHANGE ACT OF 1934. THE FINDINGS STATED THAT THE FIRM USED THE NONPUBLIC PERSONAL INFORMATION PROVIDED TO PRE-POPULATE NEW ACCOUNT FORMS WITH CERTAIN CUSTOMER INFORMATION. THE FIRM, HOWEVER, FAILED TO MAKE ANY DETERMINATION AS TO WHETHER THE RECRUITS, OR THE CURRENT BROKER-DEALERS WITH WHICH THE RECRUITS WERE ASSOCIATED, HAD OBTAINED THE CUSTOMERS' CONSENT TO PROVIDE THE FIRM WITH THE CUSTOMERS' NONPUBLIC PERSONAL INFORMATION OR PROVIDED CUSTOMERS WITH NOTICE OF, AND AN OPPORTUNITY TO OPT-OUT OF, THE DISCLOSURE. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH AND MAINTAIN REASONABLE SUPERVISORY SYSTEMS, INCLUDING WSPS AND TRAINING, TO ENSURE COMPLIANCE WITH REGULATION S-P UNDER THE SECURITIES EXCHANGE ACT OF 1934. THE FIRM FAILED TO PREVENT THE IMPROPER SOLICITATION OF NONPUBLIC PERSONAL INFORMATION FROM RECRUITS, FAILED TO ADEQUATELY TRAIN AND EDUCATE ITS STAFF ON WHAT CONSTITUTED NONPUBLIC PERSONAL INFORMATION AND THE APPROPRIATE CIRCUMSTANCES IN



WHICH SUCH INFORMATION COULD BE SHARED, AND WITH RESPECT TO REGISTERED REPRESENTATIVES WHO WERE TRANSITIONING FROM THE FIRM TO ANOTHER BROKER-DEALER, IT WAS UNABLE TO DEMONSTRATE THAT ITS WSPS WERE SYSTEMATICALLY FOLLOWED AND ENFORCED.

Initiated By:	FINRA
Date Initiated:	03/08/2016
Docket/Case Number:	2013035599201
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	N/A
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	03/08/2016
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 \$500,000.00
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	THE FIRM WAS CENSURED, FINED \$500,000, AND REQUIRED TO REVIEW AND REVISE, AS NECESSARY, ITS POLICIES, PROCEDURES, AND INTERNAL CONTROLS. WITHIN 45 BUSINESS DAYS OF THE ISSUANCE OF THE NOTICE OF ACCEPTANCE OF THIS AWC, THE CHIEF EXECUTIVE OFFICER AND CHIEF COMPLIANCE OFFICER AT THE FIRM SHALL CERTIFY IN WRITING TO FINRA THAT, WITH RESPECT TO THE AREAS DESCRIBED IN THE AWC, (I) THE FIRM HAS ENGAGED IN THE REVIEW DESCRIBED ABOVE; AND (II) AS OF THE DATE OF THE CERTIFICATION, THE FIRM HAS ESTABLISHED AND IMPLEMENTED POLICIES, PROCEDURES, AND INTERNAL CONTROLS REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH REGULATION S-P UNDER THE SECURITIES EXCHANGE ACT OF 1934.

Reporting Source: Firm



Current Status:	Final
Allegations:	<p>WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT CAUSED CERTAIN NEWLY-RECRUITED REGISTERED REPRESENTATIVES FROM OTHER BROKERAGE FIRMS TO DISCLOSE CUSTOMER NONPUBLIC PERSONAL INFORMATION TO IT IN VIOLATION OF REGULATION S-P UNDER THE SECURITIES EXCHANGE ACT OF 1934. THE FINDINGS STATED THAT THE FIRM USED THE NONPUBLIC PERSONAL INFORMATION PROVIDED TO PRE-POPULATE NEW ACCOUNT FORMS WITH CERTAIN CUSTOMER INFORMATION. THE FIRM, HOWEVER, FAILED TO MAKE ANY DETERMINATION AS TO WHETHER THE RECRUITS, OR THE CURRENT BROKER-DEALERS WITH WHICH THE RECRUITS WERE ASSOCIATED, HAD OBTAINED THE CUSTOMERS' CONSENT TO PROVIDE THE FIRM WITH THE CUSTOMERS' NONPUBLIC PERSONAL INFORMATION OR PROVIDED CUSTOMERS WITH NOTICE OF, AND AN OPPORTUNITY TO OPT-OUT OF, THE DISCLOSURE. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH AND MAINTAIN REASONABLE SUPERVISORY SYSTEMS, INCLUDING WSPS AND TRAINING, TO ENSURE COMPLIANCE WITH REGULATION S-P UNDER THE SECURITIES EXCHANGE ACT OF 1934. THE FIRM FAILED TO PREVENT THE IMPROPER SOLICITATION OF NONPUBLIC PERSONAL INFORMATION FROM RECRUITS, FAILED TO ADEQUATELY TRAIN AND EDUCATE ITS STAFF ON WHAT CONSTITUTED NONPUBLIC PERSONAL INFORMATION AND THE APPROPRIATE CIRCUMSTANCES IN WHICH SUCH INFORMATION COULD BE SHARED, AND WITH RESPECT TO REGISTERED REPRESENTATIVES WHO WERE TRANSITIONING FROM THE FIRM TO ANOTHER BROKER-DEALER, IT WAS UNABLE TO DEMONSTRATE THAT ITS WSPS WERE SYSTEMATICALLY FOLLOWED AND ENFORCED</p>
Initiated By:	FINRA
Date Initiated:	03/08/2016
Docket/Case Number:	2013035599201
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	N/A
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	03/08/2016
Sanctions Ordered:	Censure



Monetary/Fine \$500,000.00

Other Sanctions Ordered:

UNDERTAKING

Sanction Details:

THE FIRM WAS CENSURED, FINED \$500,000, AND REQUIRED TO REVIEW AND REVISE, AS NECESSARY, ITS POLICIES, PROCEDURES, AND INTERNAL CONTROLS. WITHIN 45 BUSINESS DAYS OF THE ISSUANCE OF THE NOTICE OF ACCEPTANCE OF THIS AWC, THE CHIEF EXECUTIVE OFFICER AND CHIEF COMPLIANCE OFFICER AT THE FIRM SHALL CERTIFY IN WRITING TO FINRA THAT, WITH RESPECT TO THE AREAS DESCRIBED IN THE AWC, (I) THE FIRM HAS ENGAGED IN THE REVIEW DESCRIBED ABOVE; AND (II) AS OF THE DATE OF THE CERTIFICATION, THE FIRM HAS ESTABLISHED AND IMPLEMENTED POLICIES, PROCEDURES, AND INTERNAL CONTROLS REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH REGULATION S-P UNDER THE SECURITIES EXCHANGE ACT OF 1934.

Disclosure 53 of 128

Reporting Source:

Firm

Current Status:

Final

Allegations:

STATE OF HAWAII ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF HRS 485-15(7). FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF HRS 485-15(10). RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By:

STATE OF HAWAII

Date Initiated:

09/16/2014



Docket/Case Number:	SEU-2011-13
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Stipulation and Consent
Resolution Date:	09/16/2014
Sanctions Ordered:	Monetary/Fine \$3,972.17
Other Sanctions Ordered:	
Sanction Details:	ON 9/16/2014, A FINE WAS PAID IN THE AMOUNT OF \$3972.17 TO THE TREASURER OF STATE OF HAWAII
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE STATE OF HAWAII ON 9/16/2014, IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.</p>


Disclosure 54 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	<p>WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT DISADVANTAGED CERTAIN RETIREMENT PLAN AND CHARITABLE ORGANIZATION CUSTOMERS THAT WERE ELIGIBLE TO PURCHASE CLASS A SHARES IN CERTAIN MUTUAL FUNDS WITHOUT A FRONT-END SALES CHARGE. THE FINDINGS STATED THAT THE CUSTOMERS WERE INSTEAD SOLD CLASS A SHARES WITH A FRONT-END SALES CHARGE OR CLASS B OR C SHARES WITH BACK-END SALES CHARGES AND HIGHER ONGOING FEES AND EXPENSES. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM AND PROCEDURES REASONABLY DESIGNED TO ENSURE THAT CUSTOMERS WHO PURCHASED MUTUAL FUND SHARES RECEIVED THE BENEFIT OF APPLICABLE SALES CHARGE WAIVERS. THE FIRM FAILED TO ADOPT ANY CONTROLS TO DETECT INSTANCES IN WHICH IT DID NOT PROVIDE SALES CHARGE WAIVERS TO CUSTOMERS IN CONNECTION WITH THEIR MUTUAL FUND PURCHASES.</p>
Initiated By:	FINRA
Date Initiated:	07/06/2015
Docket/Case Number:	2015044309501
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	N/A
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	07/06/2015
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 Disgorgement/Restitution



Other Sanctions Ordered: UNDERTAKING

Sanction Details: THE FIRM IS CENSURED, ORDERED TO PAY RESTITUTION IN THE TOTAL AMOUNT OF \$4,209,583.44, AND WITH RESPECT TO ANY CUSTOMER THAT PURCHASED CLASS B OR C SHARES AND STILL HOLDS SUCH SHARES IN AN ACCOUNT AT THE FIRM, IT SHALL OFFER SUCH CUSTOMER THE OPTION OF CONVERTING SUCH CLASS B OR C SHARES TO CLASS A SHARES AT NO EXPENSE TO THE CUSTOMER.

Reporting Source: Firm

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT DISADVANTAGED CERTAIN RETIREMENT PLAN AND CHARITABLE ORGANIZATION CUSTOMERS THAT WERE ELIGIBLE TO PURCHASE CLASS A SHARES IN CERTAIN MUTUAL FUNDS WITHOUT A FRONT-END SALES CHARGE. THE FINDINGS STATED THAT THE CUSTOMERS WERE INSTEAD SOLD CLASS A SHARES WITH A FRONT-END SALES CHARGE OR CLASS B OR C SHARES WITH BACK-END SALES CHARGES AND HIGHER ONGOING FEES AND EXPENSES. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM AND PROCEDURES REASONABLY DESIGNED TO ENSURE THAT CUSTOMERS WHO PURCHASED MUTUAL FUND SHARES RECEIVED THE BENEFIT OF APPLICABLE SALES CHARGE WAIVERS. THE FIRM FAILED TO ADOPT ANY CONTROLS TO DETECT INSTANCES IN WHICH IT DID NOT PROVIDE SALES CHARGE WAIVERS TO CUSTOMERS IN CONNECTION WITH THEIR MUTUAL FUND PURCHASES.

Initiated By: FINRA

Date Initiated: 07/06/2015

Docket/Case Number: [2015044309501](#)

Principal Product Type: Mutual Fund(s)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: N/A

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 07/06/2015



Sanctions Ordered:	Censure Disgorgement/Restitution
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	THE FIRM IS CENSURED, ORDERED TO PAY RESTITUTION IN THE TOTAL AMOUNT OF \$4,209,583.44, AND WITH RESPECT TO ANY CUSTOMER THAT PURCHASED CLASS B OR C SHARES AND STILL HOLDS SUCH SHARES IN AN ACCOUNT AT THE FIRM, IT SHALL OFFER SUCH CUSTOMER THE OPTION OF CONVERTING SUCH CLASS B OR C SHARES TO CLASS A SHARES AT NO EXPENSE TO THE CUSTOMER.

Disclosure 55 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	THE SEC NAMED RAYMOND JAMES FINANCIAL SERVICES (RJFS) AS A RELIEF DEFENDENT AND ORDERED TO DISGORGE TRADING PROFITS OF \$373,497 AS A RESULT OF A CANCELLED OPTIONS TRADE. THE TRADE WAS PLACED BY A FIRMS CUSTOMER WHO HAD MATERIAL INFORMATION RELATED TO A MERGER BETWEEN DOW CHEMICAL ROHM & HAAS AND LATER CANCELLED HIS TRADE, RESULTING IN A PROFIT TO THE FIRM.
Initiated By:	SECURITIES EXCHANGE COMMISSION
Date Initiated:	07/01/2013
Docket/Case Number:	13-CV-12856
Principal Product Type:	Options
Other Product Type(s):	N/A
Principal Sanction(s)/Relief Sought:	Disgorgement
Other Sanction(s)/Relief Sought:	N/A
Resolution:	Order
Resolution Date:	01/13/2014
Sanctions Ordered:	Monetary/Fine \$382,189.00 Disgorgement/Restitution
Other Sanctions Ordered:	
Sanction Details:	RJFS CONSENTED TO THE ENTRY OF FINAL JUDGEMENT WITHOUT ADMITTING OR DENYING THE ALLEGATIONS OF THE COMPLAINT TO



DISGORGE \$373,497 IN PROFITS PLUS PREJUDGEMENT INTEREST OF \$8,692.

Firm Statement

PAYMENT TO BE MADE BY JANUARY 27, 2014.

Disclosure 56 of 128

Reporting Source: Firm

Current Status: Final

Allegations: THE STATE OF NEVADA SECURITIES DIVISION, OFFICE OF THE SECRETARY OF STATE (THE "DIVISION") CONDUCTED A REVIEW OF THE RJFS BRANCH AND FA ROBERT DISMAN FOR POSSIBLE VIOLATIONS OF THE NEVADA UNIFORM SECURITIES ACT. THE DIVISION ALLEGES THAT DISMAN DID NOT DISCLOSE OR FAILED TO OBTAIN APPROVAL FROM RJFS FOR HIS ROLE AS SUCCESSOR CO-TRUSTEE, TRUSTEE, EXECUTOR, AND POWER OF ATTORNEY FOR A CLIENT. THE DIVISION ALLEGES THAT RJFS FAILED TO SUPERVISE THE BRANCH BY NOT ADEQUATELY REVIEWING EMAILS AND FOR FAILING TO DISCOVER THIS VIOLATION DURING THE BRANCH AUDIT. THE DIVISION HAS REQUESTED THAT RJFS SETTLE WITH THE DIVISION BY SIGNING AN ADMINISTRATIVE CONSENT ORDER ("ACO") AND PAYING A PENALTY IN THE MOUNT OF \$100,000.00. OUR RESPONSE IS DUE NO LATER THAN WEDNESDAY JULY 3, 2013.

Initiated By: STATE OF NEVADA SECURITIES DIVISION

Date Initiated: 06/20/2013

Docket/Case Number: 13-044

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: Other

Resolution Date: 05/28/2014

Sanctions Ordered:

Other Sanctions Ordered: N/A

Sanction Details: N/A

Firm Statement NO ACTION TAKEN BY STATE.



Disclosure 57 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>THE IOWA INSURANCE DIVISION ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF 502.412(4)(M)(2011). FURTHER, THE IOWA INSURANCE DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF IOWA CODE SECTION 502.412(4)(I)(2011).</p> <p>RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.</p>
Initiated By:	IOWA INSURANCE DIVISION
Date Initiated:	09/17/2012
Docket/Case Number:	72282
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DEIST
Resolution:	Order
Resolution Date:	09/17/2012



Sanctions Ordered:	Monetary/Fine \$52,039.74 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON SEPTEMBER 21, 2012, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$52,039.74 TO THE IOWA INSURANCE DIVISION.
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE IOWA INSURANCE ON SEPTEMBER 21, 2012, IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.</p> <p>(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.</p>

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Reporting Source:	Firm
Current Status:	Final
Allegations:	THE STATE OF OHIO DIVISION OF SECURITIES ALLEGED THAT RAYMOND



JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF ORC 1707.19(A)(4) AND (A) (8). FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF ORC 1707.

19(A)(9) AND OAC 1301:6-3-19 (B)(9).

RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By:	STATE OF OHIO DIVISION OF SECURITIES
Date Initiated:	09/14/2012
Docket/Case Number:	12-024
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESISIT
Resolution:	Order
Resolution Date:	09/14/2012
Sanctions Ordered:	Monetary/Fine \$38,969.89 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON SEPTEMBER 18, 2012, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$38,969.89 TO THE STATE OF OHIO DIVISION OF SECURITIES
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES



FINALIZED A SETTLEMENT AGREEMENT WITH THE STATE OF OHIO DIVISION OF SECURITIES ON SEPTEMBER 18, 2012, IN WHICH IT CONSENTED:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
- (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.
- (VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 59 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>THE STATE OF ALASKA DIVISION OF BANKING AND SECURITIES ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF AS 45.55.025(3) AND AS 45.55.060(A)(7). FURTHER, THE STATE OF ALASKA DIVISION OF BANKING AND SECURITIES ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF AS 45.55.060(B)(1).</p> <p>RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS</p>



AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By:	STATE OF ALASKA DIVISION OF BANKING AND SECURITIES
Date Initiated:	09/06/2012
Docket/Case Number:	11-000736-01-S
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	09/06/2012
Sanctions Ordered:	Monetary/Fine \$6,521.93 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON SEPTEMBER 10, 2012, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$6,521.93 TO THE STATE OF ALASKA DIVISION OF BANKING AND SECURITIES.
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE STATE OF ALASKA DIVISION OF BANKING AND SECURITIES ON SEPTEMBER 10, 2012, IN WHICH IT CONSENTED: (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS. (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY



MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
 (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
 (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
 (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.
 (VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 60 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	RAYMOND JAMES FINANCIAL SERVICES, INC., IN THE SALE OF AUCTION RATE SECURITIES IN PA, USED DISHONEST AND UNETHICAL PRACTICES IN THE SECURITIES BUSINESS AND FAILED TO REASONABLY SUPERVISE AGENTS IN VIOLATION OF THE PA SECURITIES ACT OF 1972.
Initiated By:	PENNSYLVANIA CONTACT: CAROLYN MENDELSON (412)-565-5083
Date Initiated:	07/24/2012
Docket/Case Number:	2009-10-21
URL for Regulatory Action:	
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES



Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	RAYMOND JAMES FINANCIAL SERVICES, INC. HAS COMPLETED A REPURCHASE OF AUCTION RATE SECURITIES FROM ELIGIBLE PA INVESTORS.
Resolution:	Settled
Resolution Date:	07/24/2012
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	Yes
Sanctions Ordered:	Monetary/Fine \$63,467.59
Other Sanctions Ordered:	
Sanction Details:	WITHIN TEN DAYS OF THE ENTRY OF THIS ORDER, RAYMOND JAMES FINANCIAL SERVICES, INC. IS ORDERED TO PAY AN ADMINISTRATIVE ASSESSMENT IN THE SUM OF \$63,467.59 TO THE COMMONWEALTH OF PA.
Regulator Statement	FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER ISSUED TO RAYMOND JAMES FINANCIAL SERVICES, INC. AND OTHER NAMED RESPONDENT.
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Reporting Source:	Firm
Current Status:	Final
Allegations:	THE COMMONWEALTH OF PENNSYLVANIA, PENNSYLVANIA SECURITIES COMMISSION ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF SEC. 517.161(1)(H). FURTHER, THE STATE OF PA ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF RULE 69W-600.013(1)(H)1. RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY



MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE

Initiated By: COMMONWEALTH OF PENNSYLVANIA, PENNSYLVANIA SECURITIES COMMISSION

Date Initiated: 07/24/2012

Docket/Case Number: 2009-10-21

Principal Product Type: Other

Other Product Type(s): AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 07/24/2012

Sanctions Ordered: Monetary/Fine \$63,467.59
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON AUGUST 9TH, 2012, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$63,467.59 TO THE COMMONWEALTH OF PENNSYLVANIA.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE COMMONWEALTH OF PENNSYLVANIA, PENNSYLVANIA SECURITIES COMMISSION ON AUGUST 09, 2012, IN WHICH IT CONSENTED:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED



BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.

(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.

(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 61 of 128

Reporting Source: Firm

Current Status: Final

Allegations: THE STATE OF ILLINOIS SECRETARY OF STATE SECURITIES DEPARTMENT ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF 8.E (1) (B). FURTHER, THE STATE OF ILLINOIS SECRETARY OF STATE SECURITIES DEPARTMENT ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF 8.E (I)(E)(I) OF THE ACT. RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMER'S AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME



INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By: THE STATE OF ILLINOIS SECRETARY OF STATE SECURITIES DEPARTMENT

Date Initiated: 07/16/2012

Docket/Case Number: 0900447

Principal Product Type: Other

Other Product Type(s): AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: CEASE AND DESIST

Resolution: Order

Resolution Date: 07/19/2012

Sanctions Ordered: Monetary/Fine \$57,186.46
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON JULY 19, 2012, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$57,186.46 TO THE STATE OF IL SECURITIES DEPARTMENT.

Firm Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE THE STATE OF ILLINOIS SECRETARY OF STATE SECURITIES DEPARTMENT ON JULY 19, 2012, IN WHICH IT CONSENTED:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
- (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2)



SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.

(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

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Reporting Source: Firm

Current Status: Final

Allegations: STATE OF WEST VIRGINIA OFFICE OF THE STATE AUDITOR SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF WEST VIRGINIA CODE 32-2-204(B)(33). FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF WEST VIRGINIA CODE 32-2-204(A)(J). RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By: STATE OF WEST VIRGINIA OFFICE OF THE STATE AUDITOR SECURITIES DIVISION

Date Initiated: 06/25/2012



Docket/Case Number: 81-705

Principal Product Type: Other

Other Product Type(s): AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: CEASE AND DESIST

Resolution: Order

Resolution Date: 06/13/2012

Sanctions Ordered: Monetary/Fine \$4,869.31
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON JUNE 22, 2012, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$4,869.31 TO THE STATE OF WEST VIRGINIA SECURITIES DIVISION.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE STATE OF WEST VIRGINIA, SECURITIES DIVISION ON JUNE 22, 2012 IN WHICH IT CONSENTED:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
- (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.



(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 63 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>THE STATE OF MICHIGAN ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF 204(A)(1)(G) OF THE ACT, MCL 451.604(A)(1)(G). FURTHER, THE STATE OF MICHIGAN ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF 204(A)(2) OF THE ACT, MCL 451.604(A)(2).</p> <p>RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMER'S AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.</p>
Initiated By:	THE STATE OF MICHIGAN
Date Initiated:	05/31/2012
Docket/Case Number:	N/A
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)



Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	05/31/2012
Sanctions Ordered:	Monetary/Fine \$84,289.39 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON JUNE 6, 2012, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$84,289.39. THE STATE WANTED TWO CHECKS ONE FOR \$75,860.45 TO THE STATE AND ONE FOR \$8,428.94 TO A MICHIGAN SPONSORED INVESTOR EDUCATION FUND.
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE STATE OF MICHIGAN ON JUNE 6, 2012 IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.</p> <p>(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.</p>



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Reporting Source:	Regulator
Current Status:	Final
Allegations:	RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. VIOLATED D.C. OFFICIAL CODE §31-5602.07(A)(9) BY ENGAGING IN DISHONEST OR UNETHICAL PRACTICES. RESPONDENTS WERE ALSO IN VIOLATION OF D.C. OFFICIAL CODE §5602.07(A)(12) BY FAILING TO REASONABLE SUPERVISE THEIR AGENTS.
Initiated By:	DISTRICT OF COLUMBIA
Date Initiated:	05/24/2012
Docket/Case Number:	SB-CO-08-12
URL for Regulatory Action:	HTTPS://DISB.DC.GOV/PUBLICATION/RAYMOND-JAMES-ASSOCIATES-INC
Principal Product Type:	Other
Other Product Type(s):	AUTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	ADMINISTRATIVE CONSENT ORDER
Resolution:	Order
Resolution Date:	05/24/2012
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Monetary/Fine \$4,302.70
Other Sanctions Ordered:	RESPONDENTS WILL TAKE VARIOUS MEASURES TO RESOLVE OUTSTANDING ARS ISSUES.
Sanction Details:	RESPONDENTS SHALL CEASE AND DESIST FROM VIOLATING D.C. OFFICIAL CODE §§ 31-5602.07(A)(9) AND 31-5602.07 (A)(12). ON JUNE 6, 2012 RESPONDENTS PAID A FINE IN THE AMOUNT OF \$4302.70 TO THE DISTRICT OF COLUMBIA, DC TREASURER.



Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>THE GOVERNMENT OF THE DISTRICT OF COLUMBIA DEPARTMENT OF INSURANCE, SECURITIES AND BANKING ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF D. C. OFFICIAL CODE 31-5602.07(A)(9). FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF D.C. OFFICIAL CODE 31-5602.07 (A)(12).</p> <p>RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMER'S AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.</p>
Initiated By:	GOVERNMENT OF THE DISTRICT OF COLUMBIA DEPARTMENT OF INSURANCE, SECURITIES AND BANKING
Date Initiated:	05/24/2012
Docket/Case Number:	SB-CO-08-12
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	05/24/2012
Sanctions Ordered:	Monetary/Fine \$4,302.70



Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details:

JUNE 5, 2012, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$4,302.70 TO THE DISTRICT OF COLUMBIA.

Firm Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH DISTRICT OF COLUMBIA ON JUNE 5, 2012 IN WHICH IT CONSENTED:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
- (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.
- (VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

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Reporting Source:

Firm

Current Status:

Final

Allegations:

THE GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS OFFICE OF THE LIEUTENANT GOVERNOR DIVISION OF BANKING AND INSURANCE



ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN THE VIOLATION OF CHAPTER 23, 9VIC, SECTION 642 9D0(13) FURTHER, THE GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS OFFICE OF THE LIEUTENANT GOVERNOR DIVISION OF BANKING AND INSURANCE ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF CHAPTER 23, 9 VIC, SECTION 642 (D)(9). RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By: THE GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS OFFICE OF THE LIEUTENANT GOVERNOR DIVISION OF BANKING AND INSURANCE.

Date Initiated: 05/17/2012

Docket/Case Number: 04/2012

Principal Product Type: Other

Other Product Type(s): AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: CEASE AND DESIST

Resolution: Other

Resolution Date: 05/17/2012

Sanctions Ordered: Monetary/Fine \$3,500.00
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON MAY 30, 2012, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF



\$3,500.00 TO THE GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS OFFICE OF THE LIEUTENANT GOVERNOR DIVISION OF BANKING AND INSURANCE.

Firm Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS OFFICE OF THE LIEUTENANT GOVERNOR DIVISION OF BANKING AND INSURANCE, IN WHICH IT CONSENTED:

(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
 (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
 (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.

(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.

(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.

(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 66 of 128

Reporting Source: Firm

Current Status: Final

Allegations: THE ARKANSAS SECURITIES COMMISSIONER ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF ARK. CODE ANN. 23-42-308 (A)(2)(G),



FURTHER, THE ARKANSAS SECURITIES COMMISSIONER ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF ARK. CODE ANN 23-42-308 (A)(2)(J). RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By:	ARKANSAS SECURITIES COMMISSIONER
Date Initiated:	04/04/2012
Docket/Case Number:	S-09-024-11OR15
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEAST AND DESIST
Resolution:	Order
Resolution Date:	04/04/2012
Sanctions Ordered:	Monetary/Fine \$5,766.45 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON APRIL 10, 2012, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$5,766.45 TO THE STATE OF ARKANSAS.
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE ARKANSAS SECURITIES COMMISSIONER ON APRIL 04, 2012 IN WHICH IT CONSENTED:



- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
- (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.
- (VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

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Reporting Source: Regulator

Current Status: Final

Allegations: NASD RULES 2110, 3011(A): THE FIRM FAILED TO IMPLEMENT PROCEDURES THAT WERE REASONABLY DESIGNED TO DETECT AND CAUSE THE REPORTING OF SUSPICIOUS TRANSACTIONS IN THE ACCOUNTS OF ITS CUSTOMER WHO USED HIS BROKERAGE ACCOUNTS AT THE FIRM TO CONDUCT A PONZI SCHEME THAT RESULTED IN LOSSES OF APPROXIMATELY \$17.8 MILLION TO THE INDIVIDUALS WHO PROVIDED FUNDS TO HIM. THE FIRM FAILED TO IMPLEMENT POLICIES AND PROCEDURES THAT COULD REASONABLY HAVE BEEN EXPECTED TO DETECT AND CAUSE THE REPORTING OF SUSPICIOUS ACTIVITY IN THE ACCOUNTS OF THE CUSTOMER, WHO WAS OPERATING A PONZI SCHEME. NUMEROUS RED FLAGS WERE EITHER NOT PROVIDED FOR REVIEW, OR



NOT ADEQUATELY CONSIDERED, BY THE FIRM. EVEN AFTER THE FIRM BECAME AWARE OF A HIGHLY UNUSUAL FLOW OF FUNDS IN AND OUT OF THE ACCOUNTS, IT FAILED TO CONDUCT ADEQUATE DUE DILIGENCE OR MONITORING OF THE ACTIVITY IN THE CUSTOMER'S ACCOUNTS, IN PART BECAUSE THE FIRM DEVOTED INADEQUATE RESOURCES TO ITS AML DEPARTMENT. THE FIRM DID NOT DEVOTE ADEQUATE RESOURCES TO ITS AML PROGRAM IN LIGHT OF LIMITATIONS IN ITS REVIEW PROCESSES. ALTHOUGH CERTAIN INDIVIDUAL REPORTS WERE FILTERED TO IDENTIFY ITEMS FOR FURTHER REVIEW, THE FIRM DID NOT CENTRALIZE OR INTEGRATE THE INFORMATION GENERATED BY THE VARIOUS REPORTS USED BY THE AML OFFICER. MOREOVER, NUMEROUS CLIENTS' ACCOUNTS WERE IDENTIFIED AS WARRANTING FURTHER DETAILED INVESTIGATION BY THE FIRM'S AML OFFICER. THE RESOURCES THAT THE FIRM DEVOTED TO AML COMPLIANCE WERE INADEQUATE IN LIGHT OF THE EXTENSIVE RESPONSIBILITIES. IN ADDITION TO EXECUTING A LARGE VOLUME OF OPTIONS TRANSACTIONS, THE CUSTOMER MOVED LARGE SUMS OF MONEY IN AND OUT OF HIS ACCOUNTS WITH THE FIRM, IN LARGE PART TO ACCOMPLISH HIS PONZI SCHEME. THE ACCOUNTS FREQUENTLY TRIGGERED SEVERAL EXCEPTION REPORTS. THE AML OFFICER HAD IDENTIFIED POTENTIAL MONEY LAUNDERING CONCERNS ASSOCIATED WITH THE FLOW OF FUNDS IN AND OUT OF THE CUSTOMER'S ACCOUNT, AND WITH HIS UNUSUAL PRACTICE OF WRITING CHECKS IN ROUND DOLLAR AMOUNTS. THEREFORE, THE FIRM'S AML OFFICER EMAILED, SEVERAL TIMES, THE REGISTERED REPRESENTATIVE ASSIGNED TO THE CUSTOMER'S ACCOUNTS, ASKING THE REGISTERED REPRESENTATIVE TO EXPLAIN THE UNUSUAL ACCOUNT ACTIVITY. IN RESPONSE TO EACH OF THESE EMAILS, THE REPRESENTATIVE ASSIGNED TO THE ACCOUNT NEVER ADEQUATELY EXPLAINED. IN SPITE OF THE UNUSUAL NATURE OF THE RESPONSE, NO ONE AT THE FIRM ATTEMPTED TO PURSUE THE CONCERNS ABOUT THE CUSTOMER'S ACCOUNT ACTIVITY DIRECTLY, CONTACT THE BRANCH MANAGER, OR ASCERTAIN WHETHER THE CUSTOMER HAD BEEN ASKED ABOUT THE ACCOUNT ACTIVITY. NOR DID ANYONE AT THE FIRM CONDUCT AN ADEQUATE REVIEW OF THE CHECKS HE HAD WRITTEN, EVEN THOUGH THEY WERE PRESENTED TO THE FIRM'S AML OFFICER FOR REVIEW. INSTEAD, THE FIRM RELIED ON THE INFORMATION PROVIDED BY THE REGISTERED REPRESENTATIVE AND A THIRD PARTY REPORT THAT LISTED THE CUSTOMER'S PROPERTIES AND VEHICLE REGISTRATIONS. DIFFERENT DEPARTMENTS AT THE FIRM FAILED TO SHARE INFORMATION ABOUT POTENTIAL RED FLAGS CONCERNING SUSPICIOUS ACTIVITY IN THE CUSTOMER'S ACCOUNTS WITH EACH OTHER AND WITH THE FIRM'S AML OFFICER. SIMILARLY, THE LOCAL BRANCH OFFICE WHERE THE ACCOUNTS WERE LOCATED FAILED TO REPORT RED FLAGS RELATED TO THE CUSTOMER'S ACCOUNT ACTIVITY AND LEGAL TROUBLES TO THE AML OFFICER. THE FIRM'S AML OFFICER ALSO FAILED TO ADEQUATELY REVIEW INFORMATION THEY



WERE PROVIDED. EVEN WITH RESPECT TO INFORMATION THAT WAS PROVIDED TO THE FIRM'S AML OFFICER, THE FIRM FAILED TO ADEQUATELY IMPLEMENT ITS PROCEDURES TO REVIEW THAT INFORMATION. ALTHOUGH THE CHECKS WERE SPECIFICALLY PROVIDED TO THE FIRM'S AML OFFICER FOR REVIEW, AN ADEQUATE REVIEW OF THOSE CHECKS WAS NEVER CONDUCTED. THE FIRM FAILED TO CONDUCT ADEQUATE MONITORING OF THE CUSTOMER'S ACCOUNTS. THE FIRM DID NOT FOLLOW UP WHEN ITS REPRESENTATIVE FAILED TO PROVIDE AN EXPLANATION FOR THE FACT THAT THE CUSTOMER'S CHECKS WERE WRITTEN IN ROUND DOLLAR AMOUNTS. (CONT. IN COMMENT)

Initiated By:	FINRA
Date Initiated:	03/30/2012
Docket/Case Number:	2009018985203
Principal Product Type:	Options
Other Product Type(s):	PONZI SCHEME
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	N/A
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	03/30/2012
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$400,000.00
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE THE FIRM IS CENSURED, FINED \$400,000, AND SHALL UNDERTAKE TO CONDUCT A COMPREHENSIVE REVIEW OF THE ADEQUACY OF ITS AML POLICIES, SYSTEMS, PROCEDURES (WRITTEN AND OTHERWISE), AND TRAINING. AT THE CONCLUSION OF THE REVIEW, WHICH SHALL BE NO MORE THAN 90 DAYS AFTER THE DATE OF THE NOTICE OF ACCEPTANCE OF THE AWC, THE FIRM SHALL CERTIFY THAT ITS



PROCEDURES ARE REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH FINRA RULE 3310 (FORMERLY NASD RULE 3011). THE CERTIFICATION SHALL BE PROVIDED IN A WRITTEN LETTER TO FINRA AND SIGNED BY A CORPORATE OFFICER OF THE FIRM ON BEHALF OF THE FIRM. AT THE TIME THE CERTIFICATION IS PROVIDED, THE FIRM WILL PROVIDE FINRA WITH A COPY OF ITS PROCEDURES RELATING TO COMPLIANCE WITH FINRA RULE 3310.

FINE PAID IN FULL APRIL 9, 2012.

Regulator Statement

THE FIRM FAILED TO REVIEW THE CUSTOMER'S PHYSICAL ACCOUNT FILE, WHICH WOULD HAVE DEMONSTRATED HIS PATTERN OF DEPOSITING THIRD PARTY STOCK CERTIFICATES. THE FIRM'S STOCK RECEIVE DEPARTMENT, WHICH IT HAD OUTSOURCED TO ITS AFFILIATE, ALSO FAILED TO MONITOR THE CUSTOMER'S REPEATED DEPOSITS OF THIRD PARTY STOCK CERTIFICATES. THE FIRM FAILED TO CONTACT THE BRANCH MANAGER ABOUT THE CUSTOMER'S ACCOUNT ACTIVITY-EVEN THOUGH THE FIRM'S AML PROCEDURES SPECIFICALLY TASKED THE AML OFFICER WITH COMMUNICATING WITH BRANCH MANAGERS. BECAUSE THE FIRM DID NOT CONDUCT ADEQUATE MONITORING OF THE ACCOUNTS, IT ALSO FAILED TO ADEQUATELY CONSIDER WHETHER IT SHOULD FILE A SUSPICIOUS ACTIVITY REPORT WITH RESPECT TO THE ACTIVITY IN THE ACCOUNTS, AS REQUIRED BY THE BANK SECRECY ACT AND THE IMPLEMENTING REGULATIONS BY THE DEPARTMENT OF THE TREASURY.

Reporting Source:

Firm

Current Status:

Final

Allegations:

NASD RULES 2110, 3011(A): THE FIRM FAILED TO IMPLEMENT PROCEDURES THAT WERE REASONABLY DESIGNED TO DETECT AND CAUSE THE REPORTING OF SUSPICIOUS TRANSACTIONS IN THE ACCOUNTS OF ITS CUSTOMER WHO USED HIS BROKERAGE ACCOUNTS AT THE FIRM TO CONDUCT A PONZI SCHEME THAT RESULTED IN LOSSES OF APPROXIMATELY \$17.8 MILLION TO THE INDIVIDUALS WHO PROVIDED FUNDS TO HIM. THE FIRM FAILED TO IMPLEMENT POLICIES AND PROCEDURES THAT COULD REASONABLY HAVE BEEN EXPECTED TO DETECT AND CAUSE THE REPORTING OF SUSPICIOUS ACTIVITY IN THE ACCOUNTS OF THE CUSTOMER, WHO WAS OPERATING A PONZI SCHEME. NUMEROUS RED FLAGS WERE EITHER NOT PROVIDED FOR REVIEW, OR NOT ADEQUATELY CONSIDERED, BY THE FIRM. EVEN AFTER THE FIRM BECAME AWARE OF A HIGHLY UNUSUAL FLOW OF FUNDS IN AND OUT OF THE ACCOUNTS, IT FAILED TO CONDUCT ADEQUATE DUE DILIGENCE OR MONITORING OF THE ACTIVITY IN THE CUSTOMER'S ACCOUNTS, IN PART BECAUSE THE FIRM DEVOTED INADEQUATE RESOURCES TO ITS AML



DEPARTMENT. THE FIRM DID NOT DEVOTE ADEQUATE RESOURCES TO ITS AML PROGRAM IN LIGHT OF LIMITATIONS IN ITS REVIEW PROCESSES. ALTHOUGH CERTAIN INDIVIDUAL REPORTS WERE FILTERED TO IDENTIFY ITEMS FOR FURTHER REVIEW, THE FIRM DID NOT CENTRALIZE OR INTEGRATE THE INFORMATION GENERATED BY THE VARIOUS REPORTS USED BY THE AML OFFICER. MOREOVER, NUMEROUS CLIENTS' ACCOUNTS WERE IDENTIFIED AS WARRANTING FURTHER DETAILED INVESTIGATION BY THE FIRM'S AML OFFICER. THE RESOURCES THAT THE FIRM DEVOTED TO AML COMPLIANCE WERE INADEQUATE IN LIGHT OF THE EXTENSIVE RESPONSIBILITIES. IN ADDITION TO EXECUTING A LARGE VOLUME OF OPTIONS TRANSACTIONS, THE CUSTOMER MOVED LARGE SUMS OF MONEY IN AND OUT OF HIS ACCOUNTS WITH THE FIRM, IN LARGE PART TO ACCOMPLISH HIS PONZI SCHEME. THE ACCOUNTS FREQUENTLY TRIGGERED SEVERAL EXCEPTION REPORTS. THE AML OFFICER HAD IDENTIFIED POTENTIAL MONEY LAUNDERING CONCERNS ASSOCIATED WITH THE FLOW OF FUNDS IN AND OUT OF THE CUSTOMER'S ACCOUNT, AND WITH HIS UNUSUAL PRACTICE OF WRITING CHECKS IN ROUND DOLLAR AMOUNTS. THEREFORE, THE FIRM'S AML OFFICER EMAILED, SEVERAL TIMES, THE REGISTERED REPRESENTATIVE ASSIGNED TO THE CUSTOMER'S ACCOUNTS, ASKING THE REGISTERED REPRESENTATIVE TO EXPLAIN THE UNUSUAL ACCOUNT ACTIVITY. IN RESPONSE TO EACH OF THESE EMAILS, THE REPRESENTATIVE ASSIGNED TO THE ACCOUNT NEVER ADEQUATELY EXPLAINED. IN SPITE OF THE UNUSUAL NATURE OF THE RESPONSE, NO ONE AT THE FIRM ATTEMPTED TO PURSUE THE CONCERNS ABOUT THE CUSTOMER'S ACCOUNT ACTIVITY DIRECTLY, CONTACT THE BRANCH MANAGER, OR ASCERTAIN WHETHER THE CUSTOMER HAD BEEN ASKED ABOUT THE ACCOUNT ACTIVITY. NOR DID ANYONE AT THE FIRM CONDUCT AN ADEQUATE REVIEW OF THE CHECKS HE HAD WRITTEN, EVEN THOUGH THEY WERE PRESENTED TO THE FIRM'S AML OFFICER FOR REVIEW. INSTEAD, THE FIRM RELIED ON THE INFORMATION PROVIDED BY THE REGISTERED REPRESENTATIVE AND A THIRD PARTY REPORT THAT LISTED THE CUSTOMER'S PROPERTIES AND VEHICLE REGISTRATIONS. DIFFERENT DEPARTMENTS AT THE FIRM FAILED TO SHARE INFORMATION ABOUT POTENTIAL RED FLAGS CONCERNING SUSPICIOUS ACTIVITY IN THE CUSTOMER'S ACCOUNTS WITH EACH OTHER AND WITH THE FIRM'S AML OFFICER. SIMILARLY, THE LOCAL BRANCH OFFICE WHERE THE ACCOUNTS WERE LOCATED FAILED TO REPORT RED FLAGS RELATED TO THE CUSTOMER'S ACCOUNT ACTIVITY AND LEGAL TROUBLES TO THE AML OFFICER. THE FIRM'S AML OFFICER ALSO FAILED TO ADEQUATELY REVIEW INFORMATION THEY WERE PROVIDED. EVEN WITH RESPECT TO INFORMATION THAT WAS PROVIDED TO THE FIRM'S AML OFFICER, THE FIRM FAILED TO ADEQUATELY IMPLEMENT ITS PROCEDURES TO REVIEW THAT INFORMATION. ALTHOUGH THE CHECKS WERE SPECIFICALLY PROVIDED TO THE FIRM'S AML OFFICER FOR REVIEW, AN ADEQUATE REVIEW OF



THOSE CHECKS WAS NEVER CONDUCTED. THE FIRM FAILED TO CONDUCT ADEQUATE MONITORING OF THE CUSTOMER'S ACCOUNTS. THE FIRM DID NOT FOLLOW UP WHEN ITS REPRESENTATIVE FAILED TO PROVIDE AN EXPLANATION FOR THE FACT THAT THE CUSTOMER'S CHECKS WERE WRITTEN IN ROUND DOLLAR AMOUNTS. (CONT. IN COMMENT

Initiated By:	FINRA
Date Initiated:	03/30/2012
Docket/Case Number:	2009018985203
Principal Product Type:	Options
Other Product Type(s):	PONZI SCHEME
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	N/A
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	03/30/2012
Sanctions Ordered:	Censure Monetary/Fine \$400,000.00
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE THE FIRM IS CENSURED, FINED \$400,000, AND SHALL UNDERTAKE TO CONDUCT A COMPREHENSIVE REVIEW OF THE ADEQUACY OF ITS AML POLICIES, SYSTEMS, PROCEDURES (WRITTEN AND OTHERWISE), AND TRAINING. AT THE CONCLUSION OF THE REVIEW, WHICH SHALL BE NO MORE THAN 90 DAYS AFTER THE DATE OF THE NOTICE OF ACCEPTANCE OF THE AWC, THE FIRM SHALL CERTIFY THAT ITS PROCEDURES ARE REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH FINRA RULE 3310 (FORMERLY NASD RULE 3011). THE CERTIFICATION SHALL BE PROVIDED IN A WRITTEN LETTER TO FINRA AND SIGNED BY A CORPORATE OFFICER OF THE FIRM ON BEHALF OF THE FIRM. AT THE TIME THE CERTIFICATION IS PROVIDED, THE FIRM WILL PROVIDE FINRA WITH A COPY OF ITS PROCEDURES RELATING TO COMPLIANCE WITH FINRA RULE 3310.
Firm Statement	THE FIRM FAILED TO REVIEW THE CUSTOMER'S PHYSICAL ACCOUNT FILE, WHICH WOULD HAVE DEMONSTRATED HIS PATTERN OF DEPOSITING THIRD PARTY STOCK CERTIFICATES. THE FIRM'S STOCK RECEIVE DEPARTMENT, WHICH IT HAD OUTSOURCED TO ITS AFFILIATE, ALSO



FAILED TO MONITOR THE CUSTOMER'S REPEATED DEPOSITS OF THIRD PARTY STOCK CERTIFICATES. THE FIRM FAILED TO CONTACT THE BRANCH MANAGER ABOUT THE CUSTOMER'S ACCOUNT ACTIVITY-EVEN THOUGH THE FIRM'S AML PROCEDURES SPECIFICALLY TASKED THE AML OFFICER WITH COMMUNICATING WITH BRANCH MANAGERS. BECAUSE THE FIRM DID NOT CONDUCT ADEQUATE MONITORING OF THE ACCOUNTS, IT ALSO FAILED TO ADEQUATELY CONSIDER WHETHER IT SHOULD FILE A SUSPICIOUS ACTIVITY REPORT WITH RESPECT TO THE ACTIVITY IN THE ACCOUNTS, AS REQUIRED BY THE BANK SECRECY ACT AND THE IMPLEMENTING REGULATIONS BY THE DEPARTMENT OF THE TREASURY.

Disclosure 68 of 128

Reporting Source: Firm

Current Status: Final

Allegations: THE STATE OF WISCONSIN, DEPARTMENT OF FINANCIAL INSTITUTIONS DIVISION OF SECURITIES, ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN VIOLATION OF 551.34(1)(G), WIS STATS. FURTHER, THE STATE OF WISCONSIN ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF 551.34 (1)(J), WIS. STATS. RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By: STATE OF WISCONSIN DEPARTMENT OF FINANCIAL INSTITUTIONS

Date Initiated: 02/23/2012

Docket/Case Number: S-220238 (EX)



Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	02/23/2012
Sanctions Ordered:	Monetary/Fine \$10,044.37 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON FEBRUARY 29, 2012 RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$10,044.37 TO THE STATE OF WISCONSIN DEPARTMENT OF FINANCIAL INSTITUTIIONS.
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE STATE OF WISCONSIN DEPARTMENT OF FINANCIAL INSTITUTIONS DIVISION OF SECURITIES ON FEBRUARY 29, 2012 IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.</p>



(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 69 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>THE SECURITIES COMMISSIONER OF DELAWARE, ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN VIOLATION OF 6 DEL. C. SEC. 73-304(A)(7) FORMERLY 6 DEL. C. SEC. 7316(A)(7) FURTHER, THE SECURITIES DIVISION COMMISSIONER OF DELAWARE ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF 6 DEL. C. SEC. 73-304 (A)(10). RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.</p>
Initiated By:	SECURITIES COMMISSIONER OF DELAWARE
Date Initiated:	01/09/2012
Docket/Case Number:	11-11-3
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)



Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	01/09/2012
Sanctions Ordered:	Monetary/Fine \$5,766.45 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON JANUARY 13, 2012 RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$5,766.45 TO THE SECURITIES COMMISSIONER OF DELAWARE.
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE SECURITIES COMMISSIONER OF DELAWARE ON JANUARY 13, 2012, IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.</p> <p>(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.</p>



Disclosure 70 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>THE STATE OF NEBRASKA DEPARTMENT OF BANKING AND FINANCE, ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF THE STATE OF NEBRASKA REV. STAT 8-1103(9)(A)(VII) (REISSUE 2007)THE STATE OF NEBRASKA ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF THE NEB. REV. 8-1103(9)(A)(XI) (REISSUE 2007).</p> <p>RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.</p>
Initiated By:	STATE OF NEBRASKA DEPARTMENT OF BANKING & FINANCE
Date Initiated:	01/12/2012
Docket/Case Number:	N/A
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	01/12/2012



Sanctions Ordered:	Monetary/Fine \$5,190.39 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON JANUARY 23, 2012, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$5,190.39 TO THE STATE OF NEBRASKA DEPARTMENT OF BANKING AND FINANCE.
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE STATE OF NEBRASKA DEPARTMENT OF BANKING AND FINANCE ON JANUARY 23, 2012, IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.</p> <p>(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.</p>

Disclosure 71 of 128

Reporting Source:	Firm
Current Status:	Final



Allegations:	<p>THE SECURITIES COMMISSIONER OF GEORGIA, ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF SEC 10-5-4 (A)(8) OF THE 1973 ACT AND RULE 590-4-2-. 14(1) FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF SECTION 10-5-4(A)(11) OF THE 1973 ACT AND RULE 590-4-2. 07(1) UNDER THE 1973 ACT.</p> <p>RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMER'S AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.</p>
Initiated By:	SECURITIES COMMISSIONER OF GEORGIA
Date Initiated:	01/04/2012
Docket/Case Number:	ENSC-120081
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	01/04/2012
Sanctions Ordered:	Monetary/Fine \$32,869.37 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON JANUARY 11, 2012, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF



\$32,869.37 TO THE STATE OF GEORGIA.

Firm Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE SECURITIES COMMISSIONER OF GEORGIA ON JANUARY 11, 2012, IN WHICH IT CONSENTED:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
- (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.
- (VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

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Reporting Source: Firm

Current Status: Final

Allegations: THE STATE OF COLORADO ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF 11-51-410(1)(G), C.R.S. FURTHER, THE DEPARTMENT



ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF 11-51-410(1)(I), C.R.S. RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By: COLORADO DIVISION OF SECURITIES

Date Initiated: 12/15/2011

Docket/Case Number: 12-6-21

Principal Product Type: Other

Other Product Type(s): AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: CEASE AND DESIST

Resolution: Order

Resolution Date: 12/15/2011

Sanctions Ordered: Monetary/Fine \$50,897.07
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON 12/20/2011 RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$50,897.07 ON 12/20/2011.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE COLORADO DIVISION OF SECURITIES ON 12/15/2011, IN WHICH IT CONSENTED:
(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.



(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.

(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.

(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.

(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.

(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	ACTIVITIES REGARDING THE SALE OF AUCTION RATE SECURITIES HAVE BEEN THE SUBJECT OF COORDINATED INVESTIGATIONS CONDUCTED BY A MULTI-STATE TASK FORCE.
Initiated By:	MISSOURI
Date Initiated:	07/29/2011
Docket/Case Number:	AP-11-23
URL for Regulatory Action:	
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES



Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: CONSENT ORDER

Resolution: Consent

Resolution Date: 11/04/2011

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? Yes

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: RESPONDENTS HAVE VOLUNTAIRLY AGREED TO PURCHASE ARS FROM CERTAIN CUSTOMERS, USE BEST EFFORTS TO PROVIDE LIQUIDITY SOLUTIONS FOR CERTAIN OTHER CUSTOMERS AND RESPONDENTS NEITHER ADMIT NOR DENY THE FINDINGS OF FACT AND CONCLUSIONS OF LAW.

Reporting Source: Firm

Current Status: Final

Allegations: THE MISSOURI SECURITIES ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF 409. 4-412 (D)(13),RSMO.(CUM. SUPP.2009) OF THE MISSOURI SECURITIES ACT OF 2003.FURTHER THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF SECTION 409. 4-412 (D)(9),RSMO.(CUM. SUPP.2009). OF THE MISSOURI SECURITIES ACT OF 2003. RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMER'S AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING



THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By: MISSOURI SECURITIES DIVISION

Date Initiated: 11/04/2011

Docket/Case Number: AP-11-23

Principal Product Type: Other

Other Product Type(s): AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: CEASE AND DESIST

Resolution: Order

Resolution Date: 11/04/2011

Sanctions Ordered: Monetary/Fine \$10,960.39
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON NOVEMBER 16, 2011 RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$10,960.39 TO THE STATE OF MISSOURI.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE MISSOURI SECURITIES DIVISION ON NOVEMBER 04,2011, IN WHICH IT CONSENTED:
(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL



INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.

(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.

(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

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Reporting Source: Firm

Current Status: Final

Allegations: THE MISSISSIPPI SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF MISS. CODE ANN. SECTION 75-71-412(D)(13). FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF MISS. CODE ANN. SECTION 75-71-412(D)(9). RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By: THE MISSISSIPPI SECURITIES DIVISION



Date Initiated:	11/23/2011
Docket/Case Number:	S-11-0240
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	11/23/2011
Sanctions Ordered:	Monetary/Fine \$10,771.52 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON DECEMBER 8, 2011 RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$10,771.52 TO THE MISSISSIPPI SECURITIES DIVISION.
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE MISSISSIPPI ON NOVEMBER 23, 2011, IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS</p>



REASONABLE INTEREST.

(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	ON NOVEMBER 22, 2011, THE SECURITIES DIVISION ENTERED INTO A CONSENT ORDER WITH RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. (COLLECTIVELY "RESPONDENTS"), IN ORDER TO SETTLE THE ALLEGATIONS THAT THE RESPONDENTS ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF AUCTION RATE SECURITIES ("ARS"), AND FAILED TO REASONABLY SUPERVISE ITS SALESPERSONS IN THE MARKETING AND SALE OF ARS. THE RESPONDENTS NEITHER ADMITTED NOR DENIED THE ALLEGATIONS, BUT AGREED TO CEASE AND DESIST FROM VIOLATING THE SECURITIES ACT OF WASHINGTON. THE RESPONDENTS AGREED TO OFFER TO PURCHASE AT PAR ARS THAT SINCE FEBRUARY 13, 2008 HAVE NOT BEEN AUCTIONING FROM CERTAIN INVESTORS WHO PURCHASED THOSE ARS FROM THE RESPONDENTS ON OR BEFORE FEBRUARY 13, 2008. THE RESPONDENTS AGREED TO PAY \$8,363.42 AS A CIVIL MONETARY PENALTY. THE RESPONDENTS WAIVED THEIR RIGHT TO A HEARING AND TO JUDICIAL REVIEW OF THIS MATTER.
Initiated By:	WASHINGTON
Date Initiated:	11/22/2011
Docket/Case Number:	S-11-0740-11-CO01
URL for Regulatory Action:	
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	CIVIL MONETARY PENALTY
Resolution:	Consent



Resolution Date: 11/22/2011

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? Yes

Sanctions Ordered: Monetary/Fine \$8,363.42

Other Sanctions Ordered:

Sanction Details: CIVIL MONETARY PENALTY OF \$8353.42 PAID IN FULL ON 12/7/2011.

Regulator Statement BRIDGETT FISHER 3609028783

Reporting Source: Firm

Current Status: Final

Allegations: STATE OF WASHINGTON SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF RCW 21.20.110(1)(G). FURTHER, STATE OF WASHINGTON SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF RCW 21.20.110(1)(J). RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By: STATE OF WASHINGTON SECURITIES DIVISION

Date Initiated: 11/22/2011

Docket/Case Number: S-11-0740-11-CO01



Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	11/22/2011
Sanctions Ordered:	Monetary/Fine \$8,363.42 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON DECEMBER 01, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$8,363.42 TO THE STATE OF WASHINGTON.
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE STATE OF WASHINGTON ON DECEMBER 01, 2011IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.</p> <p>(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON</p>



DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 76 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>COMMONWEALTH OF VIRGINIA STATE CORPORATION COMMISSION ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF COMMISSION RULE 21 VAC 5-20-280 G. FURTHER, THE COMMONWEALTH OF VIRGINIA STATE CORPORATION COMMISSION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF COMMISSION RULE 21 VAC 5-20-260.</p> <p>RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.</p>
Initiated By:	COMMONWEALTH OF VIRGINIA STATE CORPORATION COMMISSION
Date Initiated:	11/15/2011
Docket/Case Number:	SEC-2011-00039
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)



Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 11/09/2011

Sanctions Ordered: Monetary/Fine \$25,597.86
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON NOVEMBER 22, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$25,597.86 TO THE TREASURER OF VIRGINIA.

Firm Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH COMMONWEALTH OF VIRGINIA STATE CORPORATION COMMISSION ON NOVEMBER 22, 2011 IN WHICH IT CONSENTED:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
- (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.
- (VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.



Disclosure 77 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>THE MASSACHUSETTS SECURITIES DIVISION, ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF THE MASS GENERAL LAWS CH 110A. SEC. 204 (A)(2)(G). FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF MASS. GEN LAWS CH 110A, SEC. 204 (A)(2)(J). RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.</p>
Initiated By:	MASSACHUSETTS SECURITIES DIVISION
Date Initiated:	11/09/2011
Docket/Case Number:	E-2011-0049
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	11/09/2011



Sanctions Ordered:	Monetary/Fine \$29,564.14 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON NOVEMBER 10, 2011 RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$29,564.14 TO THE COMMONWEALTH OF MASSACHUSETTS.
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE MASSACHUSETTS SECURITIES DIVISION ON NOVEMBER 9, 2011, IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.</p> <p>(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.</p>

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Reporting Source:	Firm
Current Status:	Final
Allegations:	THE SECURITIES COMMISSIONER OF MARYLAND,ALLEGED THAT



RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF SEC 11-412,(A)(7)OF THE SECURITIES ACT FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF 11-412(A)(10)

OF THE SECURITIES ACT RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMER'S AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By:	SECURITIES COMMISSIONER OF MARYLAND
Date Initiated:	10/24/2011
Docket/Case Number:	NO. 2011-0336
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	10/24/2011
Sanctions Ordered:	Monetary/Fine \$21,017.75 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON NOVEMBER 2ND 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$21,017.75 TO THE SECURITIES DIVISION, OFFICE OF THE ATTORNEY GENERAL OF MARYLAND.



Firm Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE SECURITIES COMMISSIONER OF MARYLAND ON OCTOBER 24, 2011, IN WHICH IT CONSENTED:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
- (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.
- (VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

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Reporting Source:

Regulator

Current Status:

Final

Allegations:

ON OCTOBER 28, 2011, THE MAINE OFFICE OF SECURITIES ENTERED INTO AN ADMINISTRATIVE CONSENT ORDER WITH RAYMOND JAMES & ASSOCIATES, INC. AND RAYMOND JAMES FINANCIAL SERVICES, INC. (COLLECTIVELY "RESPONDENTS"), IN ORDER TO SETTLE THE ALLEGATIONS THAT THE RESPONDENTS ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF AUCTION RATE SECURITIES ("ARS"), AND FAILED TO REASONABLY SUPERVISE ITS SALESPERSONS IN



THE MARKETING AND SALE OF ARS. THE RESPONDENTS NEITHER ADMITTED NOR DENIED THE ALLEGATIONS, BUT AGREED TO CEASE AND DESIST FROM VIOLATING THE MAINE UNIFORM SECURITIES ACT. THE RESPONDENTS AGREED TO OFFER TO PURCHASE AT PAR ARS THAT SINCE FEBRUARY 13, 2008 HAVE NOT BEEN AUCTIONING FROM CERTAIN INVESTORS WHO PURCHASED THOSE ARS FROM THE RESPONDENTS ON OR BEFORE FEBRUARY 13, 2008. THE RESPONDENTS AGREED TO PAY \$4,586 AS A CIVIL MONETARY PENALTY. THE RESPONDENTS WAIVED THEIR RIGHT TO A HEARING AND TO JUDICIAL REVIEW OF THIS MATTER.

Initiated By: MAINE OFFICE OF SECURITIES

Date Initiated: 10/28/2011

Docket/Case Number: 11-7620

URL for Regulatory Action:

Principal Product Type: Other

Other Product Type(s): ACTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Cease and Desist

Other Sanction(s)/Relief Sought: CIVIL MONETARY PENALTY

Resolution: Order

Resolution Date: 10/28/2011

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 \$4,586.00
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: CIVIL MONETARY PENALTY OF \$4,586 PAID IN FULL ON 10/28/2011.

Reporting Source: Firm

Current Status: Final

Allegations: THE MAINE OFFICE OF SECURITIES ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF



SECURITIES IN VIOLATION OF 32 M.R.S. SEC. 16412(4)(M). FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF 32 M.R.S. SEC. 16412(4)(M).

RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By:	MAINE OFFICE SECURITIES
Date Initiated:	10/28/2011
Docket/Case Number:	CASE NO 11-7620
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	10/28/2011
Sanctions Ordered:	Monetary/Fine \$4,586.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON NOVEMBER 7, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$4,586.00 TO THE TREASURER STATE OF MAINE
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE MAINE OFFICE OF



SECURITIES ON OCTOBER 28, 2011, IN WHICH IT CONSENTED:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
- (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.
- (VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	THE DIVISION ALLEGED THAT: (1) RESPONDENT ENGAGED IN DISHONEST OR UNETHICAL PRACTICES WARRANTING SANCTIONS UNDER SECTION 61-1-6(2)(A)(II)(G) OF THE UTAH UNIFORM SECURITIES ACT ("ACT"); AND (2) RESPONDENT FAILED TO REASONABLY SUPERVISE ITS AGENTS WARRANTING SANCTIONS UNDER SECTION 61-1-6(2)(A)(II)(J) OF THE ACT.
Initiated By:	UTAH
Date Initiated:	10/27/2011
Docket/Case Number:	SD-11-0090

**URL for Regulatory Action:**

Principal Product Type: Other

Other Product Type(s): AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Cease and Desist

Other Sanction(s)/Relief Sought: ADMINISTRATIVE FINE

Resolution: Stipulation and Consent

Resolution Date: 10/27/2011

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? Yes

Sanctions Ordered: Monetary/Fine \$29,328.05
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: THE FINE OF \$29,328.05 WAS PAID WITHIN TEN (10) DAYS FOLLOWING ENTRY OF THE ORDER.

Regulator Statement THE STIPULATION AND CONSENT ORDER CAN BE VIEWED ONLINE AT: [HTTP://SECURITIES.UTAH.GOV/DOCKETS/11009001.PDF](http://SECURITIES.UTAH.GOV/DOCKETS/11009001.PDF)
(NOTE: THE WEB SITE MUST BE ENTERED IN ALL LOWER CASE LETTERS).

Reporting Source: Firm

Current Status: Final

Allegations: THE UTAH DIVISION OF SECURITIES ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF SEC 61-1-6(2)(A)(II)(G). THE UTAH UNIFORM SECURITIES ACT. FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF SEC 61-1-6(2)(A)(II)(G) OF THE ACT. RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS



COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By: UTAH DIVISION OF SECURITIES

Date Initiated: 10/27/2011

Docket/Case Number: SD 11-0090

Principal Product Type: Other

Other Product Type(s): AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: CEASE AND DESIST

Resolution: Stipulation and Consent

Resolution Date: 10/27/2011

Sanctions Ordered: Monetary/Fine \$29,328.05
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON NOVEMBER 7, 2011 RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$29,328.05 TO THE UTAH DIVISION SECURITIES.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE UTAH DIVISION OF SECURITIES ON OCTOBER 13, 2011, IN WHICH IT CONSENTED:
(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK



OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.

(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.

(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 81 of 128

Reporting Source: Firm

Current Status: Final

Allegations: THE OFFICE OF KANSAS SECURITIES COMMISSIONER ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF K.S.A. 17-12A412 (D) (13). FURTHER, THE SECURITIES COMMISSIONER ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF K.S.A. 17-12A412(D) (9). RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT



THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By: KANSAS SECURITIES COMMISSIONER

Date Initiated: 10/14/2011

Docket/Case Number: DOCKET NO 12 E 006- KSC NO 2012-5915

Principal Product Type: Other

Other Product Type(s): AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: CEASE AND DESIST

Resolution: Order

Resolution Date: 10/14/2011

Sanctions Ordered: Monetary/Fine \$6,238.62
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON OCTOBER 27, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$6,238.6221, 489.92 TO THE OFFICE OF KANSAS SECURITIES COMMISSIONER.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE KANSAS SECURITIES COMMISSIONER ON OCTOBER 14, 2011 IN WHICH IT CONSENTED:
(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2)



SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.

(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 82 of 128

Reporting Source: Firm

Current Status: Final

Allegations: THE MINNESOTA DEPARTMENT OF COMMERCE ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF MINN ST.80A.07, SUBD. 1(7) AND 80A.67 (D) (13).FURTHER, THE DEPARTMENT OF COMMERCE ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF MINN. STAT. 80A.07, SUBD. 1910) AND 80A.67 (D) (9). RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By: STATE OF MINNESOTA, DEPARTMENT OF COMMERCE

Date Initiated: 10/19/2011

Docket/Case Number: FILE 21296



Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	10/19/2011
Sanctions Ordered:	Monetary/Fine \$13,982.32 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON OCTOBER 27, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$13,982.32 TO THE MINNESOTA DEPARTMENT OF COMMERCE.
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE MINNESOTA DEPARTMENT OF COMMERCE OCTOBER 19, 2011, IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.</p> <p>(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN</p>



THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 83 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	ENGAGINING IN DISHONEST OR UNETHICAL PRACTICES IN CONNECTION WITH THE PURCHASE OR SALE OF SECURITIES; FAILURE TO SUPERVISE
Initiated By:	OREGON DEPARTMENT OF CONSUMER AND BUSINESS SERVICES, DIVISION OF FINANCE AND CORPORATE SECURITIES
Date Initiated:	10/13/2011
Docket/Case Number:	S-11-0060
URL for Regulatory Action:	
Principal Product Type:	Other
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	BUYBACK OF ELIGIBLE AUCTION RATE SECURITIES FROM ELIGIBLE INVESTORS
Resolution:	Consent
Resolution Date:	10/13/2011
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 \$5,577.58 Cease and Desist/Injunction
Other Sanctions Ordered:	BUYBACK OF ELIGIBLE AUCTION RATE SECURITIES FROM ELIGIBLE INVESTORS; CIVIL PENALTY OF \$5,577.58
Sanction Details:	CIVIL PENALTY PAYMENT TO OREGON DCBS OF \$5,577.58 WAS RECEIVED ON 10/21/11

**Regulator Statement**

THIS CASE RELATES TO MULTI-STATE TASK FORCE INVESTIGATIONS, COORDINATED BY NASAA, OF INVESTOR COMPLAINTS REGARDING THE MARKETING OF AUCTION RATE SECURITIES. OREGON CONSENT ORDER WAS EXECUTED ON 10/13/11.

Reporting Source:

Firm

Current Status:

Final

Allegations:

THE OREGON DEPARTMENT OF CONSUMER AND BUSINESS SERVICES, DIVISION OF FINANCE AND CORPORATE SERVICES, ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF ORS 59. 205(2) FURTHER, OREGON DEPARTMENT OF CONSUMER AND BUSINESS SERVICES, ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF ORS 59.205 (13). RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE

Initiated By:

OREGON DEPARTMENT OF CONSUMER AND BUSINESS SERVICES, DIVISION OF FINANCE AND CORPORATE SECURITIES

Date Initiated:

10/13/2011

Docket/Case Number:

DFCS FILE NO. S-11-0060

Principal Product Type:

Other

Other Product Type(s):

AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought:

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



Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	10/13/2011
Sanctions Ordered:	Monetary/Fine \$5,577.58 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON OCTOBER 18, 2011 RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$5,577.58 TO THE OREGON DEPARTMENT OF CONSUMER AND BUSINESS SERVICES.
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE OREGON DEPARTMENT OF CONSUMER AND BUSINESS SERVICES ON OCTOBER 13, 2011, IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.</p> <p>(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.</p>



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Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>THE WYOMING SECRETARY OF STATE, SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF W.S. SEC. 17-4-106(A)(2)(G). FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF W.S. SEC. 17-4-106(B)(2)(A).</p> <p>RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.</p>
Initiated By:	STATE OF WYOMING SECRETARY OF STATE SECURITIES DIVISION.
Date Initiated:	10/05/2011
Docket/Case Number:	ORDER 11-06
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Other
Resolution Date:	10/05/2011



Sanctions Ordered:	Monetary/Fine \$21,489.92 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON OCTOBER 12, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$21, 489.92 TO THE WYOMING SECRETARY OF STATE.
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE WYOMING SECRETARY OF STATE, SECURITIES DIVISION ON OCTOBER 5, 2011, IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.</p> <p>(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.</p>

Disclosure 85 of 128

Reporting Source:	Firm
Current Status:	Final



Allegations:	<p>THE STATE OF NEW MEXICO, SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF THE NEW MEXICO UNIFORM SECURITIES ACT SEC. 58-13B-16A(2)(H). FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF THE NEW MEXICO UNIFORM SECURITIES ACT SEC. 58-13B-16A(2)(K).</p> <p>RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.</p>
Initiated By:	STATE OF NEW MEXICO REGULATION AND LICENSING DEPARTMENT SECURITIES DIVISION
Date Initiated:	10/03/2011
Docket/Case Number:	11-11-996-015
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	10/03/2011
Sanctions Ordered:	Monetary/Fine \$5,719.23 Cease and Desist/Injunction
Other Sanctions Ordered:	

**Sanction Details:**

ON OCTOBER 12, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$5,719.23 TO THE NEW MEXICO SECURITIES DIVISION.

Firm Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE STATE OF NEW MEXICO SECURITIES DIVISION ON OCTOBER 3, 2011, IN WHICH IT CONSENTED:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
- (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.
- (VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 86 of 128**Reporting Source:**

Firm

Current Status:

Final

Allegations:

THE IDAHO DEPARTMENT OF FINANCE ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF IDAHO CODE SEC. 30-14-412(D)(13). FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF



IDAHO CODE SEC. 30-14-412(D)(9).
 RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By:	IDAHO DEPARTMENT OF FINANCE
Date Initiated:	10/03/2011
Docket/Case Number:	DOCKET NO. 2011-7-15
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	10/03/2011
Sanctions Ordered:	Monetary/Fine \$4,491.57 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON OCTOBER 6, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$4,491.57 TO THE IDAHO DEPARTMENT OF FINANCE.
Firm Statement	PROVIDE A BRIEF SUMMARY?WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE IDAHO DEPARTMENT OF FINANCE ON OCTOBER 3, 2011, IN WHICH IT CONSENTED: (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.



(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.

(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.

(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.

(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.

(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 87 of 128

Reporting Source: Firm

Current Status: Final

Allegations: THE NORTH DAKOTA SECURITIES DEPARTMENT ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF N.D.C.C. SEC. 10-04-11(1)(C). FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF N.D.C.C. SEC. 10-04-11(1)(M).
RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES



WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By: NORTH DAKOTA SECURITIES DEPARTMENT

Date Initiated: 09/26/2011

Docket/Case Number: N/A

Principal Product Type: Other

Other Product Type(s): AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: CEASE AND DESIST

Resolution: Order

Resolution Date: 09/26/2011

Sanctions Ordered: Monetary/Fine \$3,972.18
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON SEPTEMBER 29, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$3,972.18 TO THE NORTH DAKOTA SECURITIES DEPARTMENT

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE NORTH DAKOTA SECURITIES DEPARTMENT ON SEPTEMBER 26, 2011, IN WHICH IT CONSENTED:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE



INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.

(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.

(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 88 of 128

Reporting Source: Regulator

Current Status: Final

Allegations: FINRA RULE 2010, NASD RULES 2110, 2440, 3010, INTERPRETATIVE MATERIAL 2440-1 - RAYMOND JAMES FINANCIAL SERVICES, INC. UTILIZED AN AUTOMATED COMMISSION SCHEDULE PURSUANT TO WHICH THE FIRM CHARGED COMMISSIONS ON CERTAIN PURCHASES AND SALES OF PRIMARILY LOW-PRICED SECURITIES THAT WERE NOT FAIR AND REASONABLE, TAKING INTO CONSIDERATION THE FACTORS SET FORTH IN INTERPRETATIVE MATERIAL 2440-1(B). AS A RESULT, THE FIRM CHARGED \$795,568.02 IN EXCESSIVE COMMISSIONS. THE FIRM'S SUPERVISORY SYSTEM WAS INADEQUATE BECAUSE IN ESTABLISHING ITS COMMISSION SCHEDULE AND IN SETTING COMMISSIONS ON TRANSACTIONS, THE FIRM FAILED TO CONSIDER, FOR EACH SPECIFIC TRANSACTION, THE FACTORS DELINEATED IN INTERPRETATIVE MATERIAL 2440-1(B).

Initiated By: FINRA

Date Initiated: 09/29/2011

Docket/Case Number: [2011028605901](#)

Principal Product Type: Other



Other Product Type(s): LOW PRICED SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 09/29/2011

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 \$200,000.00
Disgorgement/Restitution

Other Sanctions Ordered: UNDERTAKINGS

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED, FINED \$200,000, AND ORDERED TO PAY \$795,568.02, PLUS INTEREST, IN RESTITUTION. THE FIRM SHALL ALSO PAY RESTITUTION TO CUSTOMERS WHO WERE CHARGED, AND WILL BE CHARGED, UNFAIR AND UNREASONABLE COMMISSIONS FROM NOVEMBER 1, 2010 THROUGH THE DATE THAT THE FIRM REVISES ITS AUTOMATED COMMISSION SCHEDULE TO CONFORM TO THE REQUIREMENTS IN NASD RULE 2440. THE FIRM SHALL PROVIDE FINRA WITH A CERTIFICATION BY A REGISTERED PRINCIPAL ON BEHALF OF THE FIRM WITHIN 120 DAYS OF ACCEPTANCE OF THIS AWC THAT IT HAS REVISED ITS AUTOMATED COMMISSION SCHEDULE. A REGISTERED PRINCIPAL ON BEHALF OF THE FIRM SHALL SUBMIT SATISFACTORY PROOF OF PAYMENT OF RESTITUTION OR OF REASONABLE AND DOCUMENTED EFFORTS UNDERTAKEN TO EFFECT RESTITUTION NO LATER THAN 120 DAYS AFTER ACCEPTANCE OF THE AWC. ANY UNDISTRIBUTED RESTITUTION AND INTEREST SHALL BE FORWARDED TO THE APPROPRIATE ESCHEAT, UNCLAIMED PROPERTY OR ABANDONED PROPERTY FUND FOR THE STATE IN WHICH THE CUSTOMER LAST RESIDED. THE FIRM SHALL PROVIDE SATISFACTORY PROOF OF SUCH ACTION TO FINRA WITHIN 14 DAYS OF FORWARDING THE UNDISTRIBUTED RESTITUTION AND INTEREST TO THE APPROPRIATE STATE AUTHORITY.



Reporting Source: Firm

Current Status: Final

Allegations: FINRA RULE 2010, NASD RULES 2110, 2440, 3010, INTERPRETATIVE MATERIAL 2440-1 - RAYMOND JAMES FINANCIAL SERVICES, INC. UTILIZED AN AUTOMATED COMMISSION SCHEDULE PURSUANT TO WHICH THE FIRM CHARGED COMMISSIONS ON CERTAIN PURCHASES AND SALES OF PRIMARILY LOW-PRICED SECURITIES THAT WERE NOT FAIR AND REASONABLE, TAKING INTO CONSIDERATION THE FACTORS SET FORTH IN INTERPRETATIVE MATERIAL 2440-1(B). AS A RESULT, THE FIRM CHARGED \$795,568.02 IN EXCESSIVE COMMISSIONS. THE FIRM'S SUPERVISORY SYSTEM WAS INADEQUATE BECAUSE IN ESTABLISHING ITS COMMISSION SCHEDULE AND IN SETTING COMMISSIONS ON TRANSACTIONS, THE FIRM FAILED TO CONSIDER, FOR EACH SPECIFIC TRANSACTION, THE FACTORS DELINEATED IN INTERPRETATIVE MATERIAL 2440-1(B).

Initiated By: FINRA

Date Initiated: 09/29/2011

Docket/Case Number: [2011028605901](#)

Principal Product Type: Other

Other Product Type(s): LOW PRICED SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 09/29/2011

Sanctions Ordered: Censure
Monetary/Fine \$200,000.00
Disgorgement/Restitution

Other Sanctions Ordered: UNDERTAKINGS

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED, FINED \$200,000, AND ORDERED TO PAY \$795,568.02, PLUS INTEREST, IN RESTITUTION. THE FIRM SHALL ALSO PAY RESTITUTION TO CUSTOMERS WHO WERE CHARGED, AND WILL BE CHARGED, UNFAIR AND UNREASONABLE COMMISSIONS FROM NOVEMBER 1, 2010 THROUGH THE DATE THAT THE FIRM REVISES ITS AUTOMATED COMMISSION SCHEDULE TO CONFORM TO THE



REQUIREMENTS IN NASD RULE 2440. THE FIRM SHALL PROVIDE FINRA WITH A CERTIFICATION BY A REGISTERED PRINCIPAL ON BEHALF OF THE FIRM WITHIN 120 DAYS OF ACCEPTANCE OF THIS AWC THAT IT HAS REVISED ITS AUTOMATED COMMISSION SCHEDULE. A REGISTERED PRINCIPAL ON BEHALF OF THE FIRM SHALL SUBMIT SATISFACTORY PROOF OF PAYMENT OF RESTITUTION OR OF REASONABLE AND DOCUMENTED EFFORTS UNDERTAKEN TO EFFECT RESTITUTION NO LATER THAN 120 DAYS AFTER ACCEPTANCE OF THE AWC. ANY UNDISTRIBUTED RESTITUTION AND INTEREST SHALL BE FORWARDED TO THE APPROPRIATE ESCHEAT, UNCLAIMED PROPERTY OR ABANDONED PROPERTY FUND FOR THE STATE IN WHICH THE CUSTOMER LAST RESIDED. THE FIRM SHALL PROVIDE SATISFACTORY PROOF OF SUCH ACTION TO FINRA WITHIN 14 DAYS OF FORWARDING THE UNDISTRIBUTED RESTITUTION AND INTEREST TO THE APPROPRIATE STATE AUTHORITY.

Disclosure 89 of 128

Reporting Source: Firm

Current Status: Final

Allegations: THE MONTANA COMMISSIONER OF SECURITIES AND INSURANCE ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF MONT. CODE ANN. SEC. 30-10-201 (13)(G). FURTHER, THE COMMISSIONER ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF MONT. CODE ANN. SEC. 30-10-201 (13)(K). RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By: MONTANA COMMISSIONER OF SECURITIES AND INSURANCE.

Date Initiated: 09/12/2011



Docket/Case Number: SEC-2001-228

Principal Product Type: Other

Other Product Type(s): AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: CEASE AND DESIST

Resolution: Order

Resolution Date: 09/12/2011

Sanctions Ordered: Monetary/Fine \$4,538.79

Other Sanctions Ordered:

Sanction Details: ON SEPTEMBER 21, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$4,538.79 TO THE STATE OF MONTANA.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE MONTANA COMMISSIONER OF SECURITIES ON SEPTEMBER 12, 2011, IN WHICH IT CONSENTED:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
- (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.



(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

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Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>THE TENNESSEE DEPT. OF COMMERCE AND INSURANCE, SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF TENN. CODE ANN. SEC. 48-2-112(A)(2)(G). FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF TENN. CODE ANN. SEC. 48-2-112(A)(2)(J).</p> <p>RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE</p>
Initiated By:	TENNESSEE DEPARTMENT OF COMMERCE AND INSURANCE, SECURITIES DIVISION.
Date Initiated:	09/19/2011
Docket/Case Number:	11-010 SI# 2011-002
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES



Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	09/19/2011
Sanctions Ordered:	Monetary/Fine \$30,414.06 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON SEPTEMBER 21, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$30,414.06 TO THE STATE OF TENNESSEE, SECURITIES DIVISION.
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE TENNESSEE SECURITIES DIVISION ON SEPTEMBER 19, 2011, IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.</p> <p>(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN</p>



ELIGIBLE ARS.

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Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>THE VERMONT DEPARTMENT OF BANKING, INSURANCE, SECURITIES AND HEALTH CARE ADMINISTRATION (THE "DEPARTMENT") ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF 9 V.S.A. SEC. 5412 (D)(13). FURTHER, THE DEPARTMENT ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF 9 V.S.A. SEC. 5412 (D)(9).</p> <p>RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.</p>
Initiated By:	VERMONT DEPARTMENT OF BANKING, INSURANCE, SECURITIES AND HEALTH CARE
Date Initiated:	09/09/2011
Docket/Case Number:	11-034-S
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST



Resolution:	Order
Resolution Date:	09/09/2011
Sanctions Ordered:	Monetary/Fine \$4,255.48 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON SEPTEMBER 16, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$4,255.48 TO THE VERMONT GENERAL FUND.
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE DEPARTMENT ON SEPTEMBER 9, 2011, IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.</p> <p>(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.</p>

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Reporting Source: Firm



Current Status:	Final
Allegations:	THE RHODE ISLAND DEPARTMENT OF BUSINESS REGULATION ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF SEC. 7-11-212(8) OF THE RIUSA. FURTHER, THE DEPARTMENT ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF SEC. 7-11-212(11) OF THE RIUSA. RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.
Initiated By:	RHODE ISLAND DEPARTMENT OF BUSINESS REGULATION
Date Initiated:	08/26/2011
Docket/Case Number:	N/A
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE ECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	08/26/2011
Sanctions Ordered:	Monetary/Fine \$3,594.44 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON SEPTEMBER 16, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$3,594.44 TO THE GENERAL TREASURER, STATE OF RHODE ISLAND.



Firm Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE RHODE ISLAND DEPARTMENT OF BUSINESS REGULATION ON AUGUST 26, 2011, IN WHICH IT CONSENTED:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
- (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.
- (VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 93 of 128

Reporting Source: Firm

Current Status: Final

Allegations: THE NEW JERSEY BUREAU OF SECURITIES ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF N.J.S.A. 49:3-58(A)(2)(VII). FURTHER, THE BUREAU OF SECURITIES ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF N.J.S.A. 49:3-58(A)(2)(XI).
RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS



AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By:	NEW JERSEY BUREAU OF SECURITIES
Date Initiated:	09/08/2011
Docket/Case Number:	N/A
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	09/08/2011
Sanctions Ordered:	Monetary/Fine \$35,183.04
Other Sanctions Ordered:	
Sanction Details:	ON SEPTEMBER 12, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$35,183.04 TO THE NEW JERSEY BUREAU OF SECURITIES.
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE NEW JERSEY BUREAU OF SECURITIES ON SEPTEMBER 8, 2011, IN WHICH IT CONSENTED: (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS. (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS. (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO



TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.

(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.

(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.

(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 94 of 128

Reporting Source: Firm

Current Status: Final

Allegations: THE SOUTH DAKOTA DIVISION OF SECURITIES ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF SDCL 47-31B-412(D)(13) AND ARSD 20:08:03:06. FURTHER, THE DIVISION OF SECURITIES ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF SDCL 47-31B-412(D)(9). RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING



THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE

Initiated By: SOUTH DAKOTA DIVISION OF SECURITIES

Date Initiated: 08/25/2011

Docket/Case Number: N/A

Principal Product Type: Other

Other Product Type(s): AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: CEASE AND DESIST

Resolution: Order

Resolution Date: 08/25/2011

Sanctions Ordered: Monetary/Fine \$5,388.71
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON SEPTEMBER 12, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$5,388.71 TO THE STATE OF SOUTH DAKOTA.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE SOUTH DAKOTA DIVISION OF SECURITIES ON AUGUST 25, 2011, IN WHICH IT CONSENTED:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL



INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.

(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.

(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 95 of 128

Reporting Source: Firm

Current Status: Final

Allegations: THE ALABAMA SECURITIES COMMISSION ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF SECTION 8-6-3 (J) (7), CODE OF ALABAMA 1975, THE ALABAMA SECURITIES ACT. FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF SECTION 8-6-3 (J) (10), CODE OF ALABAMA 1975, THE ALABAMA SECURITIES ACT. RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.



Initiated By: ALABAMA SECURITIES COMMISSION

Date Initiated: 08/23/2011

Docket/Case Number: CO-2011

Principal Product Type: Other

Other Product Type(s): AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: CEASE AND DESIST

Resolution: Order

Resolution Date: 08/23/2011

Sanctions Ordered: Monetary/Fine \$23,189.76
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON SEPTEMBER 12, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$23,189.76 TO THE ALABAMA SECURITIES COMMISSION PAYABLE AS \$22,189.76 TO THE ALABAMA SECURITIES COMMISSION AND \$1,000.00 TO NASAA.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE ALABAMA SECURITIES COMMISSION ON AUGUST 23, 2011, IN WHICH IT CONSENTED:(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006. (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN. (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO



REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.

(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 96 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>THE SECURITIES COMMISSIONER OF SOUTH CAROLINA ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF S.C. CODE ANN. SEC. 35-1-412(13). FURTHER, THE SECURITIES COMMISSIONER ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF S.C. CODE ANN. SEC. 35-1-412(9).</p> <p>RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.</p>
Initiated By:	SECURITIES COMMISSIONER OF SOUTH CAROLINA
Date Initiated:	08/25/2011
Docket/Case Number:	10056
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES



Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	08/25/2011
Sanctions Ordered:	Monetary/Fine \$15,304.41 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON SEPTEMBER 2, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$15,304.31 TO THE SOUTH CAROLINA ATTORNEY GENERAL.
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE SECURITIES COMMISSIONER OF SOUTH CAROLINA ON AUGUST 25, 2011, IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.</p> <p>(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST</p>



RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 97 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>THE PUERTO RICO COMMISSION OF FINANCIAL INSTITUTIONS ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF ARTICLE 204(A)(2)(G) OF ACT NO. 60. FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF ARTICLE 204(A)(2)(I) OF ACT NO. 60. RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.</p>
Initiated By:	PUERTO RICO OFFICE OF THE COMMISSION OF FINANCIAL INSTITUTIONS
Date Initiated:	08/25/2011
Docket/Case Number:	C11-ND-008
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE & DESIST
Resolution:	Order



Resolution Date:	08/25/2011
Sanctions Ordered:	Monetary/Fine \$3,500.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON SEPTEMBER 2, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$3,500 TO THE SECRETARIO DE HACIENDA DE PUERTO RICO, SECURITIES TRADING, INVESTOR EDUCATION AND INVESTIGATION FUND
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE PUERTO RICO COMMISSION OF FINANCIAL INSTITUTIONS ON AUGUST 25, 2011, IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.</p> <p>(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.</p>

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Reporting Source: Firm



Current Status:	Final
Allegations:	<p>THE INDIANA SECRETARY OF STATE, SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF IND. CODE SEC.23-19-4-12(D)(13). FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF IND. CODE SEC. 23-19-4-12(D)(9).</p> <p>RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.</p>
Initiated By:	STATE OF INDIANA, SECRETARY OF STATE, SECURITIES DIVISION
Date Initiated:	08/05/2011
Docket/Case Number:	11-0210C0
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST
Resolution:	Order
Resolution Date:	08/05/2001
Sanctions Ordered:	Monetary/Fine \$62,503.17 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	ON AUGUST 15, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF



\$62,503.17 TO THE INDIANA SECRETARY OF STATE.

Firm Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE INDIANA SECRETARY OF STATE ON AUGUST 5, 2011, IN WHICH IT CONSENTED:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
- (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.
- (VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

Disclosure 99 of 128

Reporting Source: Firm

Current Status: Final

Allegations: THE NEVADA SECRETARY OF STATE, SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SALE OF SECURITIES IN VIOLATION OF NRS 90.420(1)(H). FURTHER, THE SECURITIES DIVISION ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR AGENTS IN VIOLATION OF NRS 90.420(1)(L).



RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By: STATE OF NEVADA, SECRETARY OF STATE, SECURITIES DIVISION

Date Initiated: 08/18/2011

Docket/Case Number: I11-142

Principal Product Type: Other

Other Product Type(s): AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: CEASE AND DESIST

Resolution: Order

Resolution Date: 08/18/2011

Sanctions Ordered: Monetary/Fine \$7,230.19
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON AUGUST 22, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$7,230.19 TO THE NEVADA SECRETARY OF STATE.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE NEVADA SECRETARY OF STATE ON AUGUST 18, 2011, IN WHICH IT CONSENTED:
(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY



MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
 (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
 (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
 (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.
 (VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	INEQUITABLE PRACTICES AND FAILURE TO SUPERVISE AGENTS IN CONNECTION WITH THE SALE OF AUCTION RATE SECURITIES PRIOR TO FEBRUARY 13, 2008.
Initiated By:	TEXAS
Date Initiated:	06/29/2011
Docket/Case Number:	ORDER NO. IC11-FIN-08
URL for Regulatory Action:	
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief	Civil and Administrative Penalt(ies) /Fine(s)

**Sought:****Other Sanction(s)/Relief Sought:****Resolution:** Consent**Resolution Date:** 06/29/2011**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 \$293,595.77**Other Sanctions Ordered:** RESPONDENTS HAVE AGREED TO PURCHASE CERTAIN AUCTION RATE SECURITIES FROM CUSTOMERS; TO USE BEST EFFORTS TO PROVIDE LIQUIDITY SOLUTIONS FOR SOME CUSTOMERS.**Sanction Details:** RESPONDENTS PAID A FINE OF \$ 293,595.77.**Reporting Source:** Firm**Current Status:** Final

Allegations: THE TEXAS STATE SECURITIES BOARD ALLEGED THAT RAYMOND JAMES ENGAGED IN INEQUITABLE PRACTICES IN THE SALE OF SECURITIES. FURTHER, THE TEXAS STATE SECURITIES BOARD ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE THEIR FINANCIAL ADVISORS IN VIOLATION OF SECTION 115.10(B) OF THE RULES AND REGULATION OF THE TEXAS STATE SECURITIES BOARD. RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMERS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND



JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By: TEXAS STATE SECURITIES BOARD

Date Initiated: 06/29/2011

Docket/Case Number: IC11-FIN-08

Principal Product Type: Other

Other Product Type(s): AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Cease and Desist

Other Sanction(s)/Relief Sought: FINE

Resolution: Order

Resolution Date: 06/29/2011

Sanctions Ordered: Monetary/Fine \$293,595.77
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ON JULY 7, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF 293,595.77 TO THE STATE OF TEXAS.

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE OFR ON JUNE 29, 2011, IN WHICH IT CONSENTED:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
- (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2)



SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.

(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

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Reporting Source: Firm

Current Status: Final

Allegations: THE FLORIDA OFFICE OF FINANCIAL REGULATION (OFR) ALLEGED THAT RAYMOND JAMES ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN VIOLATION OF SECTION 517.161(1)(H) OF THE FLORIDA STATUTES. FURTHER, THE OFR ALLEGED THAT RAYMOND JAMES FAILED TO REASONABLY SUPERVISE ITS FINANCIAL ADVISORS IN VIOLATION OF RULE 69W-600.013(1)(H)1., FLORIDA ADMINISTRATIVE CODE, AND NASD CONDUCT RULE 3010. RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMER'S AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By: STATE OF FLORIDA OFFICE OF FINANCIAL REGULATIONS

Date Initiated: 06/29/2011

Docket/Case Number: 0404-S-10/08



Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	FINE; CENSURE; INVESTIGATIVE COSTS; REIMBURSEMENT OF NASAA ASSISTANCE.
Resolution:	Order
Resolution Date:	06/29/2011
Sanctions Ordered:	Censure Monetary/Fine \$384,933.58 Cease and Desist/Injunction
Other Sanctions Ordered:	COSTS OF INVESTIGATION AND CONSIDERATION FOR FINANCIAL ASSISTANT PROVIDED.
Sanction Details:	ON JULY 7, 2011, RAYMOND JAMES PAID A FINE IN THE AMOUNT OF \$384,933.58 TO THE OFR AND \$250,000 TO THE OFR BASED ON FEES AND EXPENSES INCURRED IN CONNECTION WITH ITS INVESTIGATION. ON JULY 7, 2011, RAYMOND JAMES PAID \$25,000 TO THE NORTH AMERICAN SECURITIES ADMINISTRATORS ASSOCIATION AS CONSIDERATION FOR FINANCIAL ASSISTANCE PROVIDED.
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE OFR ON JUNE 29, 2011, IN WHICH IT CONSENTED:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p> <p>(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.</p> <p>(V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY</p>



SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.

(VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

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Reporting Source: Regulator

Current Status: Final

Allegations: SEC ADMIN RELEASES 33-9228, 34-64767; IA RELEASE 3227, JUNE 29, 2011: THE SECURITIES AND EXCHANGE COMMISSION ("COMMISSION") DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS BE INSTITUTED PURSUANT TO SECTION 8A OF THE SECURITIES ACT OF 1933 ("SECURITIES ACT"), SECTION 15(B) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT"), AND SECTION 203(E) OF THE INVESTMENT ADVISERS ACT OF 1940 ("ADVISERS ACT"), AGAINST RAYMOND JAMES FINANCIAL SERVICES, INC. ("RJFS" "RESPONDENT").

THE COMMISSION FOUND THAT:

RJFS OFFERED AND SOLD TO SOME CUSTOMERS FINANCIAL INSTRUMENTS KNOWN AS AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE INVESTMENTS. ARS ARE BONDS OR PREFERRED STOCK WHOSE LIQUIDITY DEPENDS UPON SUFFICIENT DEMAND AT PERIODIC SECURITIES AUCTIONS. ALTHOUGH RJFS' ARS TRADE CONFIRMATIONS, SENT AFTER CUSTOMERS PURCHASED ARS, DISCLOSED THE RISK THAT THESE AUCTIONS COULD FAIL AND THAT IT WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RJFS' REGISTERED REPRESENTATIVES AND FINANCIAL ADVISERS IMPROPERLY DESCRIBED ARS AS SAFE, LIQUID ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING RJFS' CUSTOMERS, HOLDING ARS THAT THEY HAVE NOT BEEN ABLE TO



LIQUIDATE.

RJFS WILLFULLY VIOLATED SECTION 17(A)(2) OF THE SECURITIES ACT, WHICH MAKES IT UNLAWFUL FOR ANY PERSON IN THE OFFER OR SALE OF ANY SECURITIES BY THE USE OF ANY MEANS OR INSTRUMENTS OF TRANSPORTATION OR COMMUNICATION IN INTERSTATE COMMERCE OR BY USE OF THE MAIL, DIRECTLY OR INDIRECTLY, TO OBTAIN MONEY OR PROPERTY BY MEANS OF ANY UNTRUE STATEMENT OF A MATERIAL FACT OR ANY OMISSION TO STATE A MATERIAL FACT NECESSARY IN ORDER TO MAKE THE STATEMENTS MADE, IN LIGHT OF THE CIRCUMSTANCES UNDER WHICH THEY WERE MADE, NOT MISLEADING.

Initiated By: UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Date Initiated: 06/29/2011

Docket/Case Number: 3-14445

Principal Product Type: Other

Other Product Type(s): AUCTION RATE SECURITIES

Principal Sanction(s)/Relief Sought: Cease and Desist

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 06/29/2011

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? Yes

Sanctions Ordered: Censure
Cease and Desist/Injunction

Other Sanctions Ordered: UNDERTAKING:

RJFS HAS UNDERTAKEN TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS, AND OTHER MEASURES, AS SPECIFIED UNDER THE TERMS SET FORTH.

A. KEY DEFINITIONS

1. "ELIGIBLE ARS" SHALL MEAN AUCTION RATE SECURITIES THAT WERE



PURCHASED AT RJFS ON OR BEFORE FEBRUARY 13, 2008 AND THAT HAVE FAILED AT AUCTION AT LEAST ONCE SINCE THEN.

2. "ELIGIBLE CUSTOMERS" ARE THE CURRENT AND FORMER ACCOUNT OWNERS WHO PURCHASED ELIGIBLE ARS AT RJFS ON OR BEFORE FEBRUARY 13, 2008, DID NOT TRANSFER SUCH ELIGIBLE ARS AWAY FROM RJFS PRIOR TO JANUARY 1, 2006, AND HELD THOSE SECURITIES ON FEBRUARY 13, 2008. "ELIGIBLE CUSTOMERS" SHALL NOT INCLUDE ARS CUSTOMERS WHO ACTED AS INSTITUTIONAL MONEY MANAGERS AND DID NOT HOLD ARS IN RJFS ACCOUNTS.

A. RJFS WILL USE BEST EFFORTS TO PROVIDE THE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS INCLUDING, BUT NOT LIMITED TO, FACILITATING ISSUER REDEMPTIONS, RESTRUCTURINGS, AND THROUGH OTHER REASONABLE MEANS.

B. RJFS WILL USE BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RESPONDENTS BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RESPONDENTS PRIOR TO JANUARY 1, 2006.

B. RJFS SHALL ESTABLISH: 1) A DEDICATED TOLL-FREE TELEPHONE ASSISTANCE LINE TO PROVIDE INFORMATION AND TO RESPOND TO QUESTIONS CONCERNING THE TERMS OF THE ORDER; AND 2) A PUBLIC INTERNET PAGE ON ITS CORPORATE WEB SITE(S), WITH A PROMINENT LINK TO THAT PAGE APPEARING ON RJFS' RELEVANT HOMEPAGE(S), TO PROVIDE INFORMATION CONCERNING THE TERMS OF THE ORDER AND, TO RESPOND TO QUESTIONS CONCERNING THE TERMS OF THE ORDER.

C. RJFS' OFFER TO PURCHASE ELIGIBLE ARS

1. OFFER NOTICES.

A. NO LATER THAN 30 DAYS AFTER THE DATE OF THE ORDER, RJFS SHALL OFFER TO PURCHASE, AT PAR PLUS ACCRUED AND UNPAID DIVIDENDS/INTEREST, ELIGIBLE ARS FROM ELIGIBLE CUSTOMERS ("PURCHASE OFFER"), AND EXPLAIN WHAT THE ELIGIBLE CUSTOMERS MUST DO TO ACCEPT THE PURCHASE OFFER. [UNDERTAKING CONTINUED IN COMMENTS]

Sanction Details:

IN ANTICIPATION OF THE INSTITUTION OF THE PROCEEDINGS, RESPONDENT SUBMITTED AN OFFER OF SETTLEMENT ("OFFER"), WHICH THE COMMISSION HAS DETERMINED TO ACCEPT. SOLELY FOR THE PURPOSE OF THE PROCEEDINGS AND ANY OTHER PROCEEDINGS BROUGHT BY OR ON BEHALF OF THE COMMISSION, OR TO WHICH THE COMMISSION IS A PARTY, AND WITHOUT ADMITTING OR DENYING THE



FINDINGS, EXCEPT AS TO THE COMMISSION'S JURISDICTION OVER IT AND THE SUBJECT MATTER OF THE PROCEEDINGS, WHICH ARE ADMITTED, RESPONDENT CONSENTED TO THE ENTRY OF THE ORDER INSTITUTING ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS PURSUANT TO SECTION 8A OF THE SECURITIES ACT OF 1933, SECTION 15(B) OF THE EXCHANGE ACT, AND SECTION 203(E) OF THE ADVISERS ACT, MAKING FINDINGS, AND IMPOSING REMEDIAL SANCTIONS AND A CEASE-AND-DESIST ORDER ("ORDER").

THE COMMISSION FOUND THAT RJFS WILLFULLY VIOLATED SECTION 17(A)(2) OF THE SECURITIES ACT.

THE COMMISSION DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST TO IMPOSE THE SANCTIONS AGREED TO IN RESPONDENT RJFS' OFFER.

PURSUANT TO SECTION 8A OF THE SECURITIES ACT, SECTION 15(B) OF THE EXCHANGE ACT, AND SECTION 203(E) OF THE ADVISERS ACT, THE COMMISSION ORDERED THAT:

A. RESPONDENT RAYMOND JAMES FINANCIAL SERVICES, INC. CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 17(A)(2) OF THE SECURITIES ACT;

B. RESPONDENT RAYMOND JAMES FINANCIAL SERVICES, INC. IS CENSURED; AND

C. THE COMMISSION IS NOT IMPOSING A PENALTY AGAINST RESPONDENT AT THIS TIME. HOWEVER, IN THE EVENT THE DIVISION OF ENFORCEMENT ("DIVISION") BELIEVES THAT RJFS HAS NOT COMPLIED WITH THE UNDERTAKINGS, THE DIVISION MAY, AT ANY TIME FOLLOWING THE ENTRY OF THE ORDER, PETITION THE COMMISSION TO: (1) REOPEN THIS MATTER TO CONSIDER THE APPROPRIATENESS OF A PENALTY; AND (2) SEEK AN ORDER DIRECTING PAYMENT OF UP TO THE MAXIMUM CIVIL PENALTY ALLOWABLE UNDER THE LAW.

[UNDERTAKING CONTINUED]

B. RJFS SHALL PROVIDE ELIGIBLE CUSTOMERS THAT HAVE NOT RESPONDED TO THE PURCHASE OFFER ON OR BEFORE 45 DAYS BEFORE THE END OF THE APPLICABLE OFFER PERIOD A SECOND WRITTEN NOTICE INFORMING THEM AGAIN OF THE RESPONDENTS' PURCHASE OFFER, THE RELEVANT TERMS OF THE ORDER AND ANY OTHER MATERIAL ISSUES REGARDING THE ELIGIBLE CUSTOMERS' RIGHTS.

2. FOR ELIGIBLE CUSTOMERS, THE PURCHASE OFFER SHALL REMAIN OPEN FOR A PERIOD OF 75 DAYS FROM THE DATE ON WHICH RJFS SENT THE FIRST OFFER NOTICE ("OFFER PERIOD").

Regulator Statement



ACCEPTANCE AND PURCHASE PROCEDURES

1. ELIGIBLE CUSTOMERS MAY ACCEPT RJFS' PURCHASE OFFER BY NOTIFYING RJFS IN WRITING.

2. RJFS SHALL SEND THOSE ELIGIBLE CUSTOMERS A NOTICE ("PURCHASE NOTICE"), INDICATING WHEN ("PURCHASE DATE") AND HOW RJFS WILL PURCHASE THEIR ELIGIBLE ARS.

3. ELIGIBLE CUSTOMERS MAY REVOKE THEIR ACCEPTANCE OF RJFS' PURCHASE OFFER UP UNTIL RJFS PURCHASES AN ELIGIBLE CUSTOMER'S ELIGIBLE ARS.

4. RJFS SHALL PURCHASE THE ELIGIBLE ARS NO LATER THAN 5 BUSINESS DAYS FOLLOWING EXPIRATION OF THE OFFER PERIOD.

5. RJFS' PURCHASE OBLIGATIONS APPLY EQUALLY TO THOSE ELIGIBLE CUSTOMERS WHO ACCEPT THE PURCHASE OFFER WITHIN THE OFFER PERIOD, BUT WHO HAVE SINCE TRANSFERRED THEIR ELIGIBLE ARS AWAY FROM RJFS.

A. RJFS' PURCHASE OBLIGATIONS TO THESE ELIGIBLE CUSTOMERS SHALL BE CONTINGENT ON: (1) RJFS RECEIVING REASONABLY SATISFACTORY ASSURANCE FROM THE FINANCIAL SERVICES FIRM CURRENTLY HOLDING THE ELIGIBLE CUSTOMER'S ELIGIBLE ARS THAT THE BIDDING RIGHTS ASSOCIATED WITH THE ELIGIBLE ARS WILL BE TRANSFERRED TO RJFS; (2) THE ELIGIBLE CUSTOMER REACTIVATING THEIR FORMER ACCOUNT WITH RJFS; AND (3) THE TRANSFER OF THE ELIGIBLE ARS TO THE ELIGIBLE CUSTOMER'S FORMER ACCOUNT WITH RJFS.

B. RJFS SHALL USE BEST EFFORTS TO IDENTIFY, CONTACT AND ASSIST SUCH ELIGIBLE CUSTOMERS TO REACTIVATE THEIR FORMER ACCOUNT AT RJFS AND TO TRANSFER THE ELIGIBLE ARS TO SUCH ACCOUNT, AND SHALL NOT CHARGE SUCH ELIGIBLE CUSTOMERS ANY FEES RELATING TO OR IN CONNECTION WITH THE TRANSFER TO RJFS OR CUSTODIANSHIP BY RJFS OF SUCH ELIGIBLE ARS.

E. RJFS SHALL USE BEST EFFORTS TO IDENTIFY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RJFS AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE



DURATION OF THE LOAN. RJFS SHALL REIMBURSE SUCH CUSTOMERS FOR THE EXCESS EXPENSE, PLUS REASONABLE INTEREST THEREON.

F. RJFS SHALL USE BEST EFFORTS TO IDENTIFY ANY ELIGIBLE CUSTOMERS WHO: (1) PURCHASED ELIGIBLE ARS AT RJFS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THIS ORDER ("BELOW PAR SELLERS"). RJFS SHALL PAY THE BELOW PAR SELLERS THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH THE BELOW PAR SELLER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST THEREON.

G. CONSEQUENTIAL DAMAGES CLAIMS.

1. RJFS SHALL CONSENT TO PARTICIPATE IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RJFS RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

I. REPORTS AND MEETINGS

1. BEGINNING WITH THE MONTH ENDED AFTER THE DATE OF THE ORDER AND CONTINUING THROUGH THE MONTH ENDED 9 MONTHS FROM THE DATE OF THE ORDER, RJFS SHALL SUBMIT BI-MONTHLY WRITTEN REPORTS AND A FINAL WRITTEN REPORT DETAILING ITS PROGRESS WITH RESPECT TO THE UNDERTAKINGS.

2. RJFS SHALL CONFER AT LEAST QUARTERLY WITH THE COMMISSION STAFF TO DISCUSS THEIR PROGRESS WITH RESPECT TO THE UNDERTAKINGS FOR 9 MONTHS FROM THE DATE OF THE ORDER.

3. THE REPORTING AND CONFERENCE DEADLINES SET FORTH MAY BE AMENDED OR MODIFIED WITH AGREEMENT FROM THE COMMISSION STAFF.

Reporting Source:

Firm

Current Status:

Final

Allegations:

THE SEC ALLEGED THAT RAYMOND JAMES VIOLATED SECTION 17(A) (2) OF THE SECURITIES ACT WHEN RAYMOND JAMES OFFERED AND SOLD TO SOME OF ITS CUSTOMER'S AUCTION RATE SECURITIES ("ARS") WHILE NOT ACCURATELY CHARACTERIZING OR WHILE FAILING TO ADEQUATELY DISCLOSE THE TRUE NATURE AND RISKS ASSOCIATED WITH THESE



INVESTMENTS. ALTHOUGH RAYMOND JAMES' ARS TRADE CONFIRMATIONS DISCLOSED THE RISK THAT ARS AUCTIONS COULD FAIL AND THAT RAYMOND JAMES WAS NOT OBLIGED TO ENSURE THEIR SUCCESS, AT THE POINT-OF-SALE, SOME OF RAYMOND JAMES' FINANCIAL ADVISERS INACCURATELY DESCRIBED ARS AS ALTERNATIVES TO MONEY MARKET FUNDS AND OTHER CASH-LIKE INVESTMENTS, WITHOUT ADEQUATELY DISCLOSING THE AUCTION PROCESS OR THE RISK OF ILLIQUIDITY IF THESE AUCTIONS FAILED. ON FEBRUARY 13, 2008, A SIGNIFICANT NUMBER OF ARS AUCTIONS FAILED, RESULTING IN AN OVERALL MARKET COLLAPSE THAT LEFT THOUSANDS OF INVESTORS, INCLUDING SOME OF RAYMOND JAMES' CUSTOMERS, HOLDING ARS THAT THEY HAVE, IN SOME INSTANCES, NOT BEEN ABLE TO LIQUIDATE.

Initiated By:	SECURITIES EXCHANGE COMMISSION
Date Initiated:	06/29/2011
Docket/Case Number:	3-14445
Principal Product Type:	Other
Other Product Type(s):	AUCTION RATE SECURITIES
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	CENSURE
Resolution:	Order
Resolution Date:	06/29/2011
Sanctions Ordered:	Censure Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	NOT APPLY
Firm Statement	<p>WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE SEC ON JUNE 29, 2011, IN WHICH IT CONSENTED TO AN ORDER TO CEASE AND DESIST, A CENSURE, AND THE FOLLOWING UNDERTAKINGS:</p> <p>(I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.</p> <p>(II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.</p> <p>(III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.</p>



(IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON,13RESPOND AS FOLLOWS:

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINALIZED A SETTLEMENT AGREEMENT WITH THE SEC ON JUNE 29, 2011, IN WHICH IT CONSENTED TO AN ORDER TO CEASE AND DESIST, A CENSURE, AND THE FOLLOWING UNDERTAKINGS:

- (I) TO PURCHASE ELIGIBLE ARS HELD BY ELIGIBLE CUSTOMERS.
- (II) TO USE ITS BEST EFFORTS TO PROVIDE INSTITUTIONAL MONEY MANAGERS OPPORTUNITIES TO LIQUIDATE THEIR ELIGIBLE ARS.
- (III) TO USE ITS BEST EFFORTS TO IDENTIFY AND LOCATE CUSTOMERS WHO PURCHASED ELIGIBLE ARS AT RAYMOND JAMES BUT WHO TRANSFERRED SUCH ELIGIBLE ARS AWAY FROM RAYMOND JAMES PRIOR TO JANUARY 1, 2006.
- (IV) TO IDENTIFY, AND REPAY EXCESS EXPENSES AND REASONABLE INTEREST THEREON, INCURRED BY ELIGIBLE CUSTOMERS WHO TOOK OUT LOANS FROM RAYMOND JAMES AFTER FEBRUARY 13, 2008 SECURED BY ELIGIBLE ARS THAT WERE NOT SUCCESSFULLY AUCTIONING AT THE TIME THE LOAN WAS TAKEN AND WHO PAID INTEREST ASSOCIATED WITH THE ARS-BASED PORTION OF THOSE LOANS IN EXCESS OF THE TOTAL INTEREST AND DIVIDENDS RECEIVED ON THE ELIGIBLE ARS DURING THE DURATION OF THE LOAN.
- (V) TO USE ITS BEST EFFORTS TO IDENTIFY ANY CUSTOMER WHO PURCHASED ELIGIBLE ARS ON OR BEFORE FEBRUARY 13, 2008; AND (2) SUBSEQUENTLY SOLD THOSE ELIGIBLE ARS BELOW PAR BETWEEN FEBRUARY 13, 2008 AND THE DATE OF THE ORDER, AND TO REPAY ANY SUCH CUSTOMER THE DIFFERENCE BETWEEN PAR AND THE PRICE AT WHICH SUCH CUSTOMER SOLD OR REDEEMED THE ELIGIBLE ARS, PLUS REASONABLE INTEREST.
- (VI) TO PARTICIPATE, AT THE ELECTION OF AN ELIGIBLE CUSTOMER, IN THE SPECIAL ARBITRATION PROCEDURES ANNOUNCED BY FINRA ON DECEMBER 16, 2008, FOR THE EXCLUSIVE PURPOSE OF ARBITRATING AN ELIGIBLE CUSTOMER'S CLAIM FOR CONSEQUENTIAL DAMAGES AGAINST RAYMOND JAMES RELATED TO THE CUSTOMER'S INVESTMENT IN ELIGIBLE ARS.

* * *

NOTE: RAYMOND JAMES' PROPOSED RESPONSE TO QUESTION 14 OF THE CIVIL ACTION DRP STATING THAT IT ENDEAVORED TO DISCLOSE RISKS TO ITS CUSTOMERS PURCHASING ARS NEED NOT BE INCLUDED.

Disclosure 103 of 128

Reporting Source: Regulator

Current Status: Final



Allegations:	MSRB RULES G-2, G-3, G-27: THE FIRM FAILED TO ENFORCE ITS WRITTEN SUPERVISORY PROCEDURES TO ACHIEVE COMPLIANCE WITH SUITABILITY REQUIREMENTS AS THEY RELATE TO THE SALE OF INTERNAL REVENUE CODE SECTION 529 COLLEGE SAVINGS PLANS. THE FIRM'S WRITTEN SUPERVISORY PROCEDURES REQUIRED ITS REPRESENTATIVES, INCLUDING PRODUCING BRANCH MANAGERS TO SUBMIT, AT THE TIME OF A CLIENT PURCHASE OF A 529 PLAN, A FORM #1529 (529 PLAN ACCOUNT CLIENT DISCLOSURE FORM) AS WELL AS THE 529 PLAN APPLICATION, TO AN APPROPRIATELY LICENSED PRINCIPAL TO ENSURE, AMONG OTHER THINGS, THAT ALL 529 PLANS OFFERED OUTSIDE OF A CLIENT'S STATE OF RESIDENCE WERE SUITABLE IN LIGHT OF STATE TAX LAWS, FUND PERFORMANCE, COMMISSIONS AND PLAN FEES; AND THE FIRM'S COMPLIANCE DEPARTMENT RELIED ON THE BRANCH TO FORWARD THE FORMS TO IT FOR TRACKING. FINRA INVESTIGATION REVEALED A SIGNIFICANT NUMBER OF DEFICIENCIES WITH RESPECT TO THE FIRM'S IMPLEMENTATION OF ITS WRITTEN SUPERVISORY PROCEDURES PERTAINING TO THE ACCURATE AND TIMELY COMPLETION OF FORMS #1529. IN A SIGNIFICANT NUMBER OF INSTANCES, DOCUMENTARY EVIDENCE OF THE SUPERVISION OF 529 PLAN SALES WAS MISSING, AND IN THESE INSTANCES, IT APPEARS THAT THE BRANCHES WERE NOT FORWARDING THE FORMS AND APPLICATIONS TO COMPLIANCE AS REQUIRED BY FIRM POLICY. SOME OF THE FIRM BRANCH MANAGERS FUNCTIONED AS MUNICIPAL SECURITIES PRINCIPALS, REVIEWING AND APPROVING 529 PLAN TRANSACTIONS, WHILE FAILING TO BE REGISTERED AND/OR QUALIFIED IN AN APPROPRIATE MUNICIPAL SECURITIES PRINCIPAL CAPACITY.
Initiated By:	FINRA
Date Initiated:	06/01/2010
Docket/Case Number:	2007010730701
Principal Product Type:	Other
Other Product Type(s):	MUNICIPAL SECURITIES
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	N/A
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	06/01/2010



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 \$150,000.00

Other Sanctions Ordered:

Sanction Details:

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE THE FIRM IS CENSURED AND FINED \$150,000.

Reporting Source:

Firm

Current Status:

Final

Allegations:

MSRB RULES G-2, G-3, G-27: THE FIRM FAILED TO ENFORCE ITS WRITTEN SUPERVISORY PROCEDURES TO ACHIEVE COMPLIANCE WITH SUITABILITY REQUIREMENTS AS THEY RELATE TO THE SALE OF INTERNAL REVENUE CODE SECTION 529 COLLEGE SAVINGS PLANS. THE FIRM'S WRITTEN SUPERVISORY PROCEDURES REQUIRED ITS REPRESENTATIVES, INCLUDING PRODUCING BRANCH MANAGERS TO SUBMIT, AT THE TIME OF A CLIENT PURCHASE OF A 529 PLAN, A FORM #1529 (529 PLAN ACCOUNT CLIENT DISCLOSURE FORM) AS WELL AS THE 529 PLAN APPLICATION, TO AN APPROPRIATELY LICENSED PRINCIPAL TO ENSURE, AMONG OTHER THINGS, THAT ALL 529 PLANS OFFERED OUTSIDE OF A CLIENT'S STATE OF RESIDENCE WERE SUITABLE IN LIGHT OF STATE TAX LAWS, FUND PERFORMANCE, COMMISSION AND PLAN FEES; AND THE FIRM'S COMPLIANCE DEPARTMENT RELIED ON THE BRANCH TO FORWARD THE FORMS TO IT FOR TRACKING. FINRA INVESTIGATION REVEALED A SIGNIFICANT NUMBER OF DEFICIENCIES WITH RESPECT TO THE FIRM'S IMPLEMENTATION OF ITS WRITTEN SUPERVISORY PROCEDURES PERTAINING TO THE ACCURATE AND TIMELY COMPLETION OF FORMS #1529. IN A SIGNIFICANT NUMBER OF INSTANCES, DOCUMENTARY EVIDENCE OF THE SUPERVISION OF 529 PLAN SALES WAS MISSING, AND IN THESE INSTANCES, IT APPEARS THAT THE BRANCHES WERE NOT FORWARDING THE FORMS AND APPLICATIONS TO COMPLIANCE AS REQUIRED BY FIRM POLICY. THE FIRM'S BRANCH MANAGERS FUNCTIONED AS MUNICIPAL SECURITIES PRINCIPALS, REVIEWING AND APPROVING PLAN TRANSACTIONS, WHILE FAILING TO BE REGISTERED AND/OR QUALIFIED IN AN APPROPRIATE MUNICIPAL SECURITIES PRINCIPAL CAPACITY.



Initiated By: FINRA
Date Initiated: 06/01/2010
Docket/Case Number: [2007010730701](#)
Principal Product Type: Other
Other Product Type(s): MUNICIPAL SECURITIES
Principal Sanction(s)/Relief Sought: Other
Other Sanction(s)/Relief Sought: N/A
Resolution: Acceptance, Waiver & Consent(AWC)
Resolution Date: 06/01/2010
Sanctions Ordered: Censure
 Monetary/Fine \$150,000.00
Other Sanctions Ordered:
Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE THE FIRM IS CENSURED AND FINED \$150,000.

Disclosure 104 of 128

Reporting Source: Regulator
Current Status: Final
Allegations: ON MARCH 16, 2010, THE CONNECTICUT BANKING COMMISSIONER ENTERED A CONSENT ORDER (NO. CO-2009-7757-S) WITH RESPECT TO RAYMOND JAMES FINANCIAL SERVICES, INC. THE CONSENT ORDER ALLEGED THAT, IN VIOLATION OF SECTION 36B-31-6(B) OF THE REGULATIONS UNDER THE CONNECTICUT UNIFORM SECURITIES ACT THE FIRM 1) FAILED TO FOLLOW ITS MUTUAL FUND EXCHANGE PROCEDURES RELATING TO THE COMPLETION AND SUBMISSION OF MUTUAL FUND SWITCH LETTERS; AND 2) FAILED TO REASONABLY SUPERVISE THE ACTIVITIES OF AN EMPLOYEE WHO PROVIDED INACCURATE WRITTEN STATEMENTS TO THE DIVISION CONCERNING MUTUAL FUND TRADES IN A CONNECTICUT CLIENT'S ACCOUNTS, WHICH TRADES WERE OUTSIDE THEIR CONTINGENT DEFERRED SALES CHARGE PERIOD.

Initiated By: CONNECTICUT
Date Initiated: 03/16/2010



Docket/Case Number:	CO-2009-7757-S
URL for Regulatory Action:	
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	03/16/2010
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 \$10,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	THE CONSENT ORDER DIRECTED THE FIRM TO CEASE AND DESIST FROM REGULATORY VIOLATIONS AND TO PAY \$15,000 TO THE DEPARTMENT. OF THAT AMOUNT, \$10,000 CONSTITUTED AN ADMINISTRATIVE FINE AND \$5,000 WOULD BE APPLIED TO DEFRAY AGENCY INVESTIGATIVE COSTS.
Sanction Details:	SEE RESPONSE TO ITEM 13.B.
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Reporting Source:	Firm
Current Status:	Final
Allegations:	ON MARCH 16, 2010, THE CONNECTICUT BANKING COMMISSIONER ENTERED A CONSENT ORDER (NO. CO-2009-7757-S) WITH RESPECT TO RAYMOND JAMES FINANCIAL SERVICES, INC. THE CONSENT ORDER ALLEGED THAT, IN VIOLATION OF SECTION 36B-31-6(B) OF THE REGULATIONS UNDER THE CONNECTICUT UNIFORM SECURITIES ACT THE FIRM 1) FAILED TO FOLLOW ITS MUTUAL FUND EXCHANGE PROCEDURES RELATING TO THE COMPLETION AND SUBMISSION OF MUTUAL FUND SWITCH LETTERS; AND 2) FAILED TO REASONABLY SUPERVISE THE ACTIVITIES OF AN EMPLOYEE WHO PROVIDED INACCURATE WRITTEN STATEMENTS TO THE DIVISION CONCERNING MUTUAL FUND TRADES IN A CONNECTICUT CLIENT'S ACCOUNTS, WHICH TRADES WERE OUTSIDE



THEIR CONTINGENT DEFERRED SALES CHARGE PERIOD

Initiated By: CONNECTICUT

Date Initiated: 03/16/2010

Docket/Case Number: CO-2009-7757-S

Principal Product Type: Mutual Fund(s)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 03/16/2010

Sanctions Ordered: Monetary/Fine \$10,000.00
Cease and Desist/Injunction

Other Sanctions Ordered: THE CONSENT ORDER DIRECTED THE FIRM TO CEASE AND DESIST FROM REGULATORY VIOLATIONS AND TO PAY \$15,000 TO THE DEPARTMENT. OF THAT AMOUNT, \$10,000 CONSTITUTED AN ADMINISTRATIVE FINE AND \$5,000 WOULD BE APPLIED TO DEFRAY AGENCY INVESTIGATIVE COSTS.

Sanction Details: SEE RESPONSE TO ITEM 13.B.

Disclosure 105 of 128

Reporting Source: Regulator

Current Status: Final

Allegations: AFTER RECEIVING A COMPLAINT THE ENFORCEMENT SECTION OF THE MISSOURI SECURITIES DIVISION CONDUCTED AN INVESTIGATION INTO RESPONDENT'S SALE OF A VARIABLE ANNUITY TO A MISSOURI RESIDENT. THE DIVISION FOUND FACTS THAT LED THE DIVISION TO BELIEVE THAT THE RESPONDENT'S REGISTERED REPRESENTATIVE COMMITTED A VIOLATION OF THE MISSOURI SECURITIES ACT BY NOT HAVING A REASONABLE BASIS TO RECOMMEND THE SELLING OF A SECURITY TO PURCHASE A VARIABLE ANNUITY AND THAT RESPONDENT FAILED TO REASONABLY SUPERVISE THE REGISTERED REPRESENTATIVE IN THIS TRANSACTION. THE DIVISION ALLEGES THAT THE RESPONDENT'S ACTIONS CONSTITUTE GROUNDS TO DISCIPLINE THE REGISTRATION OF RAYMOND JAMES FINANCIAL SERVICES, INC. PURSUANT TO SECTION 409.4-412, RSMO. (CUM. SUPP. 2008).



Initiated By:	MISSOURI
Date Initiated:	01/16/2009
Docket/Case Number:	AP-09-01
URL for Regulatory Action:	
Principal Product Type:	Annuity(ies) - Variable
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	CONSENT ORDER
Resolution:	Consent
Resolution Date:	02/17/2009
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 \$52,300.00
Other Sanctions Ordered:	RESPONDENT SHALL PAY TO THE MISSOURI SECRETARY OF STATE'S INVESTOR EDUCATION AND PROTECTION FUND \$50,000. RESPONDENT IS ORDERED TO PAY \$2,300 AS THE COST OF THIS INVESTIGATION. RESPONDENT SHALL PAY ITS OWN COSTS AND ATTORNEYS' FEES WITH RESPECT TO THIS MATTER.
Sanction Details:	SEE ABOVE

Reporting Source:	Firm
Current Status:	Final
Appealed To and Date Appeal Filed:	N/A
Allegations:	THE STATE OF MISSOURI ALLEGES THE FIRM FAILED TO REASONABLY SUPERVISE A SINGLE TRANSACTION CONDUCTED BY ONE OF ITS FINANCIAL ADVISORS RELATING TO THE SUITABILITY OF A VARIABLE ANNUITY PURCHASE.
Initiated By:	STATE OF MISSOURI OFFICE OF SECRETARY OF STATE.



Date Initiated: 11/18/2008

Docket/Case Number: AP-09-01

Principal Product Type: Annuity(ies) - Variable

Other Product Type(s): N/A

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 02/17/2009

Sanctions Ordered: Monetary/Fine \$50,000.00

Other Sanctions Ordered: N/A

Sanction Details: \$ 50,000.00 CONTRIBUTION TO THE STATE OF MISSOURI INVESTOR EDUCATION AND PROTECTION FUND; \$2,300 TO COVER COST OF INVESTIGATION.

Firm Statement THE FIRM WAS ORDERED TO MAKE A CONTRIBUTION TO THE STATE OF MISSOURI INVESTOR EDUCATION AND PROTECTION FUND AND COVER THE COST OF INVESTIGATION NO OTHER SANCTIONS WERE LEVIED.

Disclosure 106 of 128

Reporting Source: Firm

Current Status: Final

Allegations: LACK OF CERTAIN HOME OFFICE PERSONNEL WHO MAY DEAL WITH GEORGIA RESIDENTS TO BE PROPERLY REGISTERED WITHIN THE STATE OF GEORGIA.
DEFICIENCIES WITHIN SOME BRANCH OFFICES LOCATED WITHIN THE STATE OF GEORGIA THAT WERE DETECTED BY THE FIRM AS A RESULT OF ROUTINE BRANCH[JOHN BOWMAN] EXAMINATIONS .

Initiated By: STATE OF GA

Date Initiated: 12/01/2006

Docket/Case Number: ENCSC01003

Principal Product Type: No Product

Other Product Type(s):



Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	AWC FINE \$25,000.00.
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	02/05/2008
Sanctions Ordered:	Monetary/Fine \$25,000.00
Other Sanctions Ordered:	
Sanction Details:	TOTAL AMOUNT TO BE PAID BY RAYMOND JAMES FINANCIAL SERVICES, INC \$25,000.00. PORTION LEVY AGAINST APPLICANT. DATE PAID 02/07/2008/ PENALTY WAIVED NONE.

Disclosure 107 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	FAILURE TO REASONABLY SUPERVISE TRADING ACTIVITY AT THEIR FORMER BRANCH RUN BY REGISTERED REPRESENTATIVE W.B. SMITH ("WBS BRANCH"), RESULTING IN UNAUTHORIZED DISCRETIONARY TRADING, UNSUITABLE AND DISCRETIONARY OPTIONS ACTIVITY, AND FAILURE OF THE BRANCH MANAGER TO APPROVE OF DAILY TRADES
Initiated By:	MASSACHUSETTS
Date Initiated:	02/01/2008
Docket/Case Number:	E-2008-0012
URL for Regulatory Action:	
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:	CEASE & DESIST; EXTENSION OF OFFER(S) OF SETTLEMENT TO PARTIES WITH OUTSTANDING CLAIMS RELATED TO TRADING DURING THE RELEVANT TIME PERIOD & IMPLEMENTATION/MAINTENANCE OF POLICIES AND PROCEDURES DESIGNED TO PROTECT AGAINST/PREVENT TYPES OF SUPERVISORY FAILURES THAT LED TO WRONGDOING
Resolution:	Consent



Resolution Date: 02/01/2008

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 \$25,000.00
Cease and Desist/Injunction

Other Sanctions Ordered: EXTENSION OF OFFER(S) OF SETTLEMENT TO PARTIES WITH OUTSTANDING CLAIMS RELATED TO TRADING IN THE WBS BRANCH DURING THE RELEVANT TIME PERIOD & MAINTENANCE OF POLICIES AND PROCEDURES DESIGNED TO PROTECT AGAINST/PREVENT TYPES OF SUPERVISORY FAILURES THAT LED TO WRONGDOING

Sanction Details: SUCH NEW/UPGRADED POLICIES AND PROCEDURES SHALL INCLUDE CORRESPONDENCE REVIEW, POSITION CONCENTRATION/SUITABILITY REVIEW, TRAINING PROGRAMS FOR BRANCH AUDITORS & WRITTEN SUPERVISORY PROCEDURES REGARDING VARIABLE ANNUITIES, MUTUAL FUND SWITCHES, AND HANDLING OF CUSTOMER COMPLAINTS

Reporting Source: Firm

Current Status: Final

Allegations: FAILURE TO PROPERLY SUPERVISE TWO REGISTERED REPRESENTATIVES.

Initiated By: COMMONWEALTH OF MASSACHUSETTS

Date Initiated: 12/18/2003

Docket/Case Number: E-2008-0012

Principal Product Type: Options

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: FINE

Resolution: Stipulation and Consent

Resolution Date: 02/01/2008



Sanctions Ordered:	Censure Monetary/Fine \$25,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	TOTAL AMOUNT TO BE PAID BY RAYMOND JAMES FINANCIAL SERVICES, INC \$25,000.0. PORTION LEVY AGAINST APPLICANT. DATE PAID 02/07/2008. PENALTY WAIVED NONE.

Disclosure 108 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	A CONSENT ORDER OF CENSURE AND ASSESSMENT WAS GIVEN FOR FAILURE TO SUPERVISE THEIR SECURITIES AGENTS AS THEY MADE UNSUITABLE RECOMMENDATIONS TO CUSTOMERS, LENT MONEY TO A CUSTOMER, ENGAGED IN FRAUDULENT ACTIVITY, INDUCED EXCESSIVE TRADING IN CUSTOMERS' ACCOUNTS, AND FILED FALSE AND/OR MISLEADING STATEMENTS WITH THE DIVISION.
Initiated By:	WISCONSIN
Date Initiated:	06/20/2007
Docket/Case Number:	S-05127
URL for Regulatory Action:	
Principal Product Type:	Other
Other Product Type(s):	LICENSED BROKER-DEALER
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	AND ASSESSMENT
Resolution:	Order
Resolution Date:	06/29/2007
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	Yes



Sanctions Ordered: Censure

Other Sanctions Ordered: AND ASSESSMENT

Sanction Details: RAYMOND JAMES FINANCIAL SERVICES, INC. SHALL PAY THE SUM OF \$50,000 AS AN ADMINISTRATIVE ASSESSMENT PURSUANT TO SEC. 551.605, WIS. STATS.

Regulator Statement A CONSENT ORDER OF CENSURE AND ASSESSMENT WAS GIVEN FOR FAILURE TO SUPERVISE THEIR SECURITIES AGENTS AS THEY MADE UNSUITABLE RECOMMENDATIONS TO CUSTOMERS, LENT MONEY TO A CUSTOMER, ENGAGED IN FRAUDULENT ACTIVITY, INDUCED EXCESSIVE TRADING IN CUSTOMERS' ACCOUNTS, AND FILED FALSE AND/OR MISLEADING STATEMENTS WITH THE DIVISION.

Reporting Source: Firm

Current Status: Final

Allegations: A CONSENT ORDER OF CENSURE AND ASSESSMENT WAS GIVEN FOR FAILURE TO SUPERVISE THEIR SECURITIES AGENTS AS THEY MADE UNSUITABLE RECOMMENDATIONS TO CUSTOMERS, LENT MONEY TO A CUSTOMER, ENGAGED IN FRAUDULENT ACTIVITY, INDUCED EXCESSIVE TRADING IN CUSTOMERS' ACCOUNTS, AND FILED FALSE AND/OR MISLEADING STATEMENTS WITH THE DIVISION

Initiated By: WISCONSIN

Date Initiated: 06/20/2007

Docket/Case Number: S-05127

Principal Product Type: Other

Other Product Type(s): LICENSED BROKER-DEALER

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought: AND ASSESSMENT

Resolution: Order

Resolution Date: 06/29/2007

Sanctions Ordered: Censure

Other Sanctions Ordered: AND ASSESSMENT

Sanction Details: RAYMOND JAMES FINANCIAL SERVICES, INC. SHALL PAY THE SUM OF



\$50,000 AS AN ADMINISTRATIVE ASSESSMENT PURSUANT TO SEC. 551.605, WIS. STATS.

Firm Statement

A CONSENT ORDER OF CENSURE AND ASSESSMENT WAS GIVEN FOR FAILURE TO SUPERVISE THEIR SECURITIES AGENTS AS THEY MADE UNSUITABLE RECOMMENDATIONS TO CUSTOMERS, LENT MONEY TO A CUSTOMER, ENGAGED IN FRAUDULENT ACTIVITY, INDUCED EXCESSIVE TRADING IN CUSTOMERS' ACCOUNTS, AND FILED FALSE AND/OR MISLEADING STATEMENTS WITH THE DIVISION.

Disclosure 109 of 128

Reporting Source: Regulator

Current Status: Final

Allegations: FAILURE TO REASONABLE SUPERVISE SALESPERSON RICHARD WESTERMAN BY ALLOWING HIM TO ENGAGE IN AN UNSUITABLE TRADING STRATEGY IN A CLIENT'S IRA, BY ALLOWING HIM TO TRANSACT BUSINESS IN A CLIENT'S IRA WITHOUT AUTHORIZATION OR WRITTEN DISCRETION AND BY ALLOWING HIM TO INDUCE TRADING IN A CLIENT'S IRA WHICH WAS EXCESSIVE IN SIZE OR FREQUENCY IN VIEW OF THE FINANCIAL RESOURCES AND CHARACTER OF THE ACCOUNT.

Initiated By: MONTANA

Date Initiated: 05/31/2007

Docket/Case Number: C-05-04-06-225

URL for Regulatory Action:

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: RESTITUTION

Resolution: Consent

Resolution Date: 08/06/2007

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 \$10,000.00

Other Sanctions Ordered:

Sanction Details: PAY \$6,296.76 TO THE INVESTOR PROTECTION TRUST.

Reporting Source: Firm

Current Status: Final

Allegations: THE STATE OF MONTANA, AS A RESULT OF A CUSTOMER COMPLAINT, ALLEGES THE FIRM FAILED TO ADEQUATELY SUPERVISE ITS FINANCIAL ADVISOR, RICHARD WESTERMAN.

Initiated By: THE STATE OF MT

Date Initiated: 05/31/2007

Docket/Case Number: C-05-04-06-225

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

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Restitution

Other Sanction(s)/Relief Sought:

Resolution: Stipulation and Consent

Resolution Date: 08/06/2007

Sanctions Ordered: Monetary/Fine \$10,000.00

Other Sanctions Ordered: N/A

Sanction Details: AMOUNT TO BE PAID BY RAYMOND JAMES FINANCIAL SERVICES, INC \$10,000. TO THE STATE OF MT.

AMOUNT TO BE PAID BY RAYMOND JAMES FINANCIAL SERVICES, INC IN THE AMOUNT OF \$6,296.76 TO THE INVESTOR PROTECTION TRUST FOR THE BENEFIT OF MONTANA INVESTORS.

PORTION LEVIED AGAINST APPLICANT. PENALTY WAIVED NONE.

Firm Statement WITHOUT ADMITTING OR DENYING ANY WRONGDOING OR THE ALLEGATIONS CITED HEREIN, RAYMOND JAMES FINANCIAL SERVICES, STIPULATES AND CONSENTS AS FOLLOWS:



TO PAY A FINE IN THE AMOUNT OF \$10,000 TO THE STATE OF MT.
TO PAY THE AMOUNT OF \$6,296.76 TO THE INVESTOR PROTECTION TRUST
FOR THE BENEFIT OF MONTANA INVESTORS.

Disclosure 110 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	NASD RULE 2110 - RAYMOND JAMES FINANCIAL SERVICES, INC. FAILED TO RECORD A REGISTERED REPRESENTATIVE'S PRIVATE SECURITIES TRANSACTION ON ITS BOOKS AND RECORDS AND TO SUPERVISE THE INDIVIDUAL'S PARTICIPATION IN THE PRIVATE SECURITIES TRANSACTION AS IF IT WAS A TRANSACTION OF THE FIRM OR IN A MANNER REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE LAWS, RULES AND REGULATIONS THAT APPLIED TO THE REGISTERED REPRESENTATIVE'S ACTIVITIES.
Initiated By:	NASD
Date Initiated:	04/05/2007
Docket/Case Number:	2005001729502
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:	04/05/2007
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 \$12,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED



TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS;
THEREFORE, THE FIRM IS CENSURED AND FINED \$12,000.

Reporting Source: Firm

Current Status: Final

Allegations: IN JULY 2001 ONE OF RJFS'S REGISTERED REPRESENTATIVES, SOUGHT AUTHORIZATION FROM RJFS TO PARTICIPATE IN A TRANSACTION INVOLVING THE PURCHASE OF A TELECOMMUNICATIONS SERVICE COMPANY BY THE REGISTERED REPRESENTATIVE AND SEVERAL OTHER INVESTORS. RJFS REVIEWED AND APPROVED THE REGISTERED REPRESENTATIVE'S PARTICIPATION IN THE TRANSACTION AS AN OUTSIDE BUSINESS ACTIVITY. HOWEVER, THE PROPOSED TRANSACTION WAS IN FACT A PRIVATE SECURITIES TRANSACTION, AS THAT TERM IS USED IN NASD CONDUCT RULE 3040.

Initiated By: NASD

Date Initiated: 11/29/2006

Docket/Case Number: [2005001729502](#)

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: 04/05/2007

Sanctions Ordered: Censure
Monetary/Fine \$12,000.00

Other Sanctions Ordered:

Sanction Details: TOTAL AMOUNT TO BE PAID BY RAYMOND JAMES FINANCIAL SERVICES, INC. \$12,000. PORTION LEVIED AGAINST APPLICANT. PENALTY WAIVED NONE.

Disclosure 111 of 128

Reporting Source: Regulator



Current Status: Final

Allegations: SEC RULES 17A-3, 17A-4, NASD RULES 2110, 3010, 3010(A)(2), 3110(A) - RAYMOND JAMES FINANCIAL SERVICES, INC.'S SUPERVISORY SYSTEM WAS NOT REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH SECURITIES RULES AND REGULATIONS AND FAILED TO DETECT AN INDIVIDUAL'S VIOLATIONS. THE FIRM'S SUPERVISORY SYSTEM AND PROCEDURES FOR SUPERVISING VARIABLE ANNUITY (VA) TRANSACTIONS WERE NOT SUFFICIENT TO DETECT AND PREVENT VIOLATIONS; MOST OF THE REVIEWS WERE DELEGATED TO A SUBSIDIARY FIRM NOT A MEMBER OF NASD; NASD REQUIRES REVIEW OF EACH TYPE OF BUSINESS BY A DESIGNATED PRINCIPAL. AN INDIVIDUAL'S UNSUITABLE RECOMMENDATIONS APPEARED ON EXCEPTION REPORTS BUT WERE NOT BROUGHT TO THE ATTENTION OF HER DIRECT SUPERVISOR OR COMPLIANCE OFFICERS; CUSTOMER CLAIMS AGAINST THE INDIVIDUAL WERE SETTLED AT A TOTAL COST OF \$10,178,395. SAMPLED ACCOUNTS OF THE INDIVIDUAL APPEARED IN AUDIT REPORTS INCLUDING OBJECTIVES AND RISK TOLERANCE BUT THE AUDITOR FOUND NO RELATED DEFICIENCIES AND NOTED NO FOLLOW-UP ACTION. TRANSACTION REPORTS WERE REVIEWED BY BRANCH MANAGERS BUT DID NOT REQUIRE ANYONE ELSE TO CONDUCT A DAILY REVIEW OF THE REPORTS. BRANCH MANAGERS APPROVED THEIR OWN TRANSACTIONS, OPENED AND ACCEPTED NEW ACCOUNTS AS THE REGISTERED REPRESENTATIVE AND AS THE ACCEPTING PRINCIPAL OR BRANCH MANAGER AND SENT CORRESPONDENCE TO CUSTOMERS THAT WAS NOT REVIEWED BY A DESIGNATED PRINCIPAL. SALES MANAGERS RESPONSIBLE FOR SUPERVISION OF BRANCH OFFICE MANAGERS WERE PERMITTED TO GO FOR YEARS WITHOUT CONTACTING A PRINCIPAL THE BRANCH OFFICE MANAGER WAS RESPONSIBLE FOR SUPERVISING; THE FIRM FAILED TO PROVIDE ADEQUATE TRAINING AND INSTRUCTION TO COMPLIANCE ADVISORS ON HOW AND WHEN TO DETECT A SUSPECT TRANSACTION AND ESCALATE IT FOR REVIEW. THE FIRM HAD NO INDEPENDENT PRINCIPAL REVIEW OF CUSTOMERS' INVESTMENT SUITABILITY. [CONTINUED IN COMMENTS]

Initiated By: NASD

Date Initiated: 02/21/2007

Docket/Case Number: [EAF0400730001](#)

Principal Product Type: Mutual Fund(s)

Other Product Type(s): VARIABLE ANNUITIES

Principal Sanction(s)/Relief Sought:

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

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 02/21/2007

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 \$2,750,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED AND FINED \$2,750,000.

Regulator Statement THE FIRM'S SYSTEM AND PROCEDURES ALLOWED BRANCH MANAGERS TO REVIEW AND ENDORSE THEIR OWN VA CONTRACTS, TRANSFERS TO FUND VAS AND MOST 1035 EXCHANGES WITHOUT ADDITIONAL PRINCIPAL REVIEW; THE FIRM HAD NO SYSTEM FOR REVIEWING THE SUITABILITY OF SUB-ACCOUNT TRANSACTIONS AND HAD NO SYSTEM TO ENSURE VA SUB-ACCOUNT SWITCHES WERE ENTERED INTO A COMPUTER RECORDKEEPING PROGRAM OR WERE ENTERED ONTO HANDWRITTEN BLOTTERS. WRITTEN SUPERVISORY PROCEDURES CONCERNING MUTUAL FUND SWITCHES WERE NOT REASONABLY DESIGNED TO DETECT AND PREVENT VIOLATIONS; THERE WAS NO GUIDANCE IN THE WRITTEN SUPERVISORY PROCEDURES TO ASSIST A BRANCH MANAGER IN DETERMINING IF CORRESPONDENCE CONSTITUTED A COMPLAINT THAT SHOULD BE FORWARDED TO THE COMPLIANCE DEPT. THE FIRM'S AUDIT MODULE DID NOT HAVE A SECTION OR QUESTIONS TO ENSURE THAT TRANSACTIONS AND CORRESPONDENCE OF PRODUCING PRINCIPALS WORKING IN ONE-PERSON OFFICES WERE REVIEWED INDEPENDENTLY BY ANOTHER PRINCIPAL. THE FIRM FAILED TO MAKE, KEEP CURRENT OR PRESERVE BLOTTERS CONTAINING ITEMIZED DAILY RECORDS OF ALL SECURITIES TRANSACTIONS.

Reporting Source: Firm

Current Status: Final

Allegations: THE NASD ALLEGED VIOLATIONS OF SECURITIES EXCHANGE ACT RULES



17A-3 AND 17A-4 AND NASD RULES 2110 AND 3010. THE NASD'S PRIMARY ALLEGATION IS THAT RJFS' SUPERVISORY SYSTEM AND PROCEDURES FOR SUPERVISING THE ACTIVITIES OF PRODUCING BRANCH MANAGERS WERE NOT REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH SECURITIES RULES AND REGULATIONS, IN VIOLATION OF NASD CONDUCT RULES 2110 AND 3010. THE FIRM'S SUPERVISORY PROCEDURES WITH RESPECT TO PRODUCING MANAGERS WERE FOUND TO BE TOO RELIANT ON THE REVIEW OF PERIODIC EXCEPTION REPORTS, QUARTERLY BRANCH REVIEW AND SURPRISE AUDITS WHICH WERE DEEMED INADEQUATE, ALLOWING A NUMBER OF ACTIVITIES COMMONLY ASSOCIATED WITH DAILY SUPERVISION TO BE CONDUCTED BY THE PRODUCING MANAGERS.

IN ADDITION, THE NASD ALLEGED THAT RJFS' SUPERVISORY SYSTEM AND PROCEDURES FOR SUPERVISING VARIABLE ANNUITY ("VA") TRANSACTIONS AND MUTUAL FUND SWITCHES WERE NOT REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH SECURITIES RULES AND REGULATIONS, IN VIOLATION OF NASD CONDUCT RULES 2110 AND 3010.

FINALLY, THE NASD ALLEGED THAT RJFS FAILED TO MAKE AND KEEP CURRENT OR PRESERVE BLOTTERS CONTAINING ITEMIZED DAILY RECORDS OF ALL PURCHASES AND SALES OF VARIABLE ANNUITIES IN VIOLATION OF SECURITIES EXCHANGE ACT RULES 17A-3 AND 17A-4 AND NASD RULES 2110 AND 3010.

Initiated By: NASD

Date Initiated: 02/21/2007

Docket/Case Number: [EAF0400730001](#)

Principal Product Type: Annuity(ies) - Variable

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 02/21/2007

Sanctions Ordered: Censure
Monetary/Fine \$2,750,000.00

Other Sanctions Ordered:

**Sanction Details:**

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED AND FINED \$2,750,000.

Firm Statement

THE FIRM'S SYSTEM AND PROCEDURES ALLOWED BRANCH MANAGERS TO REVIEW AND ENDORSE THEIR OWN VA CONTRACTS, TRANSFERS TO FUND VAS AND MOST 1035 EXCHANGES WITHOUT ADDITIONAL PRINCIPAL REVIEW; THE FIRM HAD NO SYSTEM FOR REVIEWING THE SUITABILITY OF SUB-ACCOUNT TRANSACTIONS AND HAD NO SYSTEM TO ENSURE VA SUB-ACCOUNT SWITCHES WERE ENTERED INTO A COMPUTER RECORDKEEPING PROGRAM OR WERE ENTERED ONTO HANDWRITTEN BLOTTERS. WRITTEN SUPERVISORY PROCEDURES CONCERNING MUTUAL FUND SWITCHES WERE NOT REASONABLY DESIGNED TO DETECT AND PREVENT VIOLATIONS; THERE WAS NO GUIDANCE IN THE WRITTEN SUPERVISORY PROCEDURES TO ASSIST A BRANCH MANAGER IN DETERMINING IF CORRESPONDENCE CONSTITUTED A COMPLAINT THAT SHOULD BE FORWARDED TO THE COMPLIANCE DEPT. THE FIRM'S AUDIT MODULE DID NOT HAVE A SECTION OR QUESTIONS TO ENSURE THAT TRANSACTIONS AND CORRESPONDENCE OF PRODUCING PRINCIPALS WORKING IN ONE-PERSON OFFICES WERE REVIEWED INDEPENDENTLY BY ANOTHER PRINCIPAL. THE FIRM FAILED TO MAKE, KEEP CURRENT OR PRESERVE BLOTTERS CONTAINING ITEMIZED DAILY RECORDS OF ALL SECURITIES TRANSACTIONS.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	SUITABILITY, EXCESSIVE TRADING, AND SUPERVISION.
Initiated By:	NEW HAMPSHIRE BUREAU OF SECURITIES REGULATION
Date Initiated:	02/25/2005
Docket/Case Number:	COM05-005
URL for Regulatory Action:	
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	NA
Principal Sanction(s)/Relief Sought:	Restitution
Other Sanction(s)/Relief Sought:	COST OF THE INVESTIGATION.



Resolution: Consent

Resolution Date: 11/11/2006

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: Disgorgement/Restitution

Other Sanctions Ordered: COSTS OF \$20,000.

Sanction Details: RESTITUTION TO INVESTOR OF \$60,000.

Regulator Statement RJFS AGENT RECOMMENDATIONS TO BUY AND SELL STOCKS FOR ONE ELDERLY CLIENT RESULTED IN EXCESSIVE TRADING, AND UNSUITABLE PURCHASES. RJFS FAILED TO SUPERVISE LEADING TO SUITABILITY ISSUES AND EXCESSIVE TRADING OF ACCOUNT RESULTING IN UNNECESSARY LOSSES AND COMMISSIONS. RJFS DID NOT ADMIT OR DENY THE ALLEGATIONS.

Reporting Source: Firm

Current Status: Final

Allegations: FROM 2003 TO 2004 A CLIENT OF THE FIRM ALLEGED THAT HE INVESTED APPROXIMATELY TWO HUNDRED AND SEVENTY THOUSAND DOLLARS TO PURCHASE THESE VARIABLE ANNUITIES WHICH HE CLAIMS WERE UNSUITABLE, CARRIED UNNECESSARY AND UNWANTED EXPENSES AND RESULTED IN A LOSS OF PRINCIPAL.

Initiated By: STATE OF NEW HAMPSHIRE

Date Initiated: 06/13/2005

Docket/Case Number: COMO5-005

Principal Product Type: Annuity(ies) - Variable

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Restitution

Other Sanction(s)/Relief Sought: UNDERTAKING

Resolution: Consent



Resolution Date:	11/11/2005
Sanctions Ordered:	Monetary/Fine \$60,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	
Sanction Details:	THE FIRM WAS ORDERED TO PAY RESTITUTION TO THE CLIENT IN THE AMOUNT OF \$60,000.00. THE SETTLEMENT WAS EXECUTED ON NOVEMBER 10, 2006.
Firm Statement	THE MATER WAS RESOLVED BY A CONSENT ORDER REQUIRING THE FIRM TO MAKE RESTITUTION TO THE CLIENT IN THE AMOUNT OF \$60,000.00.

Disclosure 113 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	FAILURE TO SUPERVISE; FAILURE TO MAINTAIN PROPER BOOKS AND RECORDS
Initiated By:	UTAH DIVISION OF SECURITIES
Date Initiated:	09/19/2005
Docket/Case Number:	SD-05-0061
URL for Regulatory Action:	
Principal Product Type:	Other
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Suspension
Other Sanction(s)/Relief Sought:	CENSURE; FINE; HIRE OUTSIDE CONSULTANT TO REVIEW SUPERVISORY STRUCTURE AND PROCEDURES
Resolution:	Stipulation and Consent
Resolution Date:	10/16/2006
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 \$100,000.00

**Other Sanctions Ordered:**

Sanction Details: FINE OF \$100,000.00 TO BE PAID WITHIN THIRTY (30) DAYS OF THE ORDER.
PAID 11/02/2006.

Regulator Statement DETAILS OF THE STIPULATION AND CONSENT ORDER CAN BE VIEWED
ONLINE AT: [HTTP://SECURITIES.UTAH.GOV/DOCKETS/05006103.PDF](http://SECURITIES.UTAH.GOV/DOCKETS/05006103.PDF)

Reporting Source: Firm

Current Status: Final

Allegations: THE DEPARTMENT OF COMMERCE OF THE STATE OF UTAH (THE "DIVISION") FILED A PETITION FOR ORDER REVOKING LICENSE AND/OR BARRING LICENSEE AGAINST KARON COOK AND AN ORDER OF CENSURE, SUSPENSION OF LICENSE AND IMPOSITION OF FINE AGAINST RJFS. THE STATED GROUNDS FOR REVOCATION AND/OR BAR AND SUSPENSION OF COOK'S LICENSE, INCLUDES, BUT ARE NOT LIMITED TO, BORROWING MONEY FROM A CLIENT, SELLING AWAY, SELLING UNREGISTERED SECURITY, ACTING AS A PERSONAL CUSTODIAN, ACTING AS AN UNLICENSED INVESTMENT ADVISER, FILING A FALSE FORM U-4, AND SECURITIES FRAUD. THE DIVISION'S ALLEGATIONS REGARDING RJFS ARE FAILURE TO SUPERVISE, INADEQUATE SUPERVISORY SYSTEM, AND FAILURE TO MAINTAIN BOOKS AND RECORDS OF THE FIRM. THE DIVISION SEEKS MONETARY AND OTHER RELIEF FROM BOTH PARTIES INCLUDING FOR RJFS A PROPOSED FINE OF \$100,000.00, A 90 DAY SUSPENSION, AND A CENSURE.

Initiated By: DIVISION OF SECURITIES - UTAH DEPARTMENT OF COMMERCE

Date Initiated: 09/30/2005

Docket/Case Number: SD-05-0061

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Stipulation and Consent

Resolution Date: 10/16/2006

Sanctions Ordered: Monetary/Fine \$100,000.00

**Other Sanctions Ordered:**

Sanction Details: TOTAL AMOUNT TO BE PAID BY RAYMOND JAMES FINANCIAL SERVICES, INC \$100,000. PORTION LEVIED AGAINST APPLICANT. DATE PAID 10/30/2006. PENALTY WAIVED NONE.

Disclosure 114 of 128

Reporting Source: Regulator

Current Status: Final

Allegations: NASD CONDUCT RULE 3010, 2110, 2210(D) RAYMOND JAMES FINANCIAL SERVICES, INC. CONTINUED TO UTILIZE EXISTING PROCEDURES FOR REVIEW OF ACCOUNT OPENING DOCUMENTS AND ACCOUNT TRANSACTIONS, AND DID NOT ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN PROCEDURES, SPECIFICALLY DESIGNED TO REVIEW AND MONITOR THEIR FEE-BASED BUSINESS. THE FIRM NEVER CONDUCTED AN INITIAL OR PERIODIC SUPERVISORY REVIEW OF THEIR CUSTOMERS' FEE-BASED BROKERAGE ACCOUNTS TO DETERMINE WHETHER SUCH ACCOUNTS WERE APPROPRIATE FOR PARTICULAR CUSTOMERS. THE FIRM HAS NEVER MONITORED THEIR FEE-BASED BROKERAGE ACCOUNTS FOR INACTIVITY. IN ADDITION THE FIRM FAILED TO PROVIDE THEIR BROKERS WITH ANY CRITERIA OR GUIDANCE TO DETERMINE WHETHER A FEE-BASED BROKERAGE ACCOUNT WAS APPROPRIATE FOR A CUSTOMER AND DID NOT REQUIRE THEIR BROKERS TO DETERMINE WHETHER CERTAIN ACCOUNTS WERE APPROPRIATE FOR A CUSTOMER BEFORE OPENING IT. RAYMOND JAMES DID NOT DIRECT THEIR BROKERS TO CONSIDER WHETHER THE FEE-BASED BROKERAGE ACCOUNT WAS APPROPRIATE FOR A PARTICULAR CUSTOMER IN LIGHT OF THE SERVICES PROVIDED, THE PROJECTED COST TO THE CUSTOMER, ALTERNATIVE FEE STRUCTURES THAT WERE AVAILABLE, AND THE CUSTOMER'S FEE STRUCTURE PREFERENCES. IN ADDITION, THE FIRM MARKETING ACCOUNTS THROUGH THE USE OF SALES LITERATURE THAT FAILED TO COMPLY WITH NASD'S ADVERTISING RULES.

Initiated By: NASD

Date Initiated: 04/26/2005

Docket/Case Number: [CE3050007](#)

Principal Product Type: Mutual Fund(s)

Other Product Type(s): STOCKS

Principal Sanction(s)/Relief Sought:



Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 04/26/2005

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 \$750,000.00
Disgorgement/Restitution

Other Sanctions Ordered: UNDERTAKING

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS RAYMOND JAMES FINANCIAL SERVICES, INC. CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE THE FIRM IS CENSURED, FINED \$750,000 AND ORDERED TO PAY \$138,000, PLUS INTEREST, IN RESTITUTION TO PUBLIC CUSTOMERS. THE FIRM SHALL RETAIN AN INDEPENDENT CONSULTANT IF THE FIRM WISHES TO CONTINUE WITH FEE-BASED BUSINESS AFTER JULY 1, 2005.

Regulator Statement RESPONDENT FIRM HAS STATED THEIR INTENTION TO DISCONTINUE ALL OF THEIR FEE-BASED BROKERAGE BUSINESS BY JULY 1, 2005.

Reporting Source: Firm

Current Status: Final

Allegations: THE NASD ALLEGED THAT RJFS VIOLATED NASD CONDUCT RULES 3010 AND 2110 BY FAILING TO IMPLEMENT SUPERVISORY PROCEDURES SPECIFICALLY DESIGNED TO MONITOR FEE-BASED BROKERAGE ACCOUNTS TO DETERMINE WHETHER THEY WERE "APPROPRIATE" FOR CUSTOMERS. AS A RESULT, THE NASD ALLEGED THAT RJFS RECOMMENDED AND OPENED FEE-BASED BROKERAGE ACCOUNTS WITHOUT DETERMINING WHETHER THE ACCOUNTS WERE APPROPRIATE. THE NASD ALSO ALLEGED THAT RJFS MARKETED FEE-BASED BROKERAGE ACCOUNTS THROUGH THE USE OF SALES LITERATURE THAT FAILED TO COMPLY WITH NASD'S ADVERTISING RULES WHICH VIOLATED NASD CONDUCT RULES 2210(D) AND 2110.

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS (NASD)



Date Initiated: 11/17/2004

Docket/Case Number: [CE3050007](#)

Principal Product Type: Mutual Fund(s)

Other Product Type(s): STOCKS

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 04/26/2005

Sanctions Ordered: Censure
Monetary/Fine \$750,000.00
Disgorgement/Restitution

Other Sanctions Ordered: UNDERTAKING

Sanction Details: SANCTIONS: \$750,000 - RJFS RESPONSIBLE FOR \$525,900.
RESTITUTION: \$138,000 - RJFS RESPONSIBLE FOR \$110,707.35 + INTERST OF \$6,165.30

Disclosure 115 of 128

Reporting Source: Regulator

Current Status: Final

Allegations: NASD RULES 2110, 3010 - RESPONDENT MEMBER ACTING THROUGH AN EMPLOYEE IMPROPERLY FORMED AND MAINTAINED A PARTNERSHIP IN A SECURITIES ACCOUNT AT THE FIRM WITH A PUBLIC CUSTOMER BY FAILING TO MEMORIALIZE THE PARTNERSHIP AGREEMENT IN WRITING; FAILING TO HAVE A SPECIFIC AGREEMENT OR UNDERSTANDING AS TO THE CAPITAL CONTRIBUTIONS TO BE MADE BY THE PARTNERS, HOW AND WHEN CAPITAL CONTRIBUTIONS WOULD BE WITHDRAWN, AND HOW PROFIT AND LOSSES WERE TO BE SHARED; FAILING TO PROVIDE THE CUSTOMER WITH COMPLETE PERIODIC STATEMENTS AS TO THE COMPLETE COST TO THE PARTNERSHIP OF EACH SECURITIES TRANSACTIONS; FAILED TO ENFORCE A SUPERVISORY SYSTEM AND WRITTEN SUPERVISORY PROCEDURES REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS AND REGULATIONS, AND WITH APPLICABLE RULES OF NASD.

Initiated By: NASD



Date Initiated: 11/24/2004

Docket/Case Number: C8A040107

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: 11/24/2004

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 \$10,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINANCIAL SERVICES, INC., CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE THE FIRM IS CENSURED AND FINED \$10,000.

Reporting Source: Firm

Current Status: Final

Allegations: THE NASD FOUND THAT MICHAEL P. MONSON, A FORMER RJFS FINANCIAL ADVISOR, IMPROPERLY FORMED AND MAINTAINED A PARTNERSHIP IN A SECURITIES ACCOUNT WITH A CUSTOMER IN VIOLATION OF NASD CONDUCT RULE 2110. IN ADDITION, THE NASD FOUND THAT RJFS FAILED TO ENFORCE A SUPERVISORY SYSTEM OR WRITTEN SUPERVISORY PROCEDURES REGARDING MONSON'S INVOLVEMENT IN THE PARTNERSHIP, IN VIOLATION OF NASD CONDUCT RULES 2110 AND 3010.

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS (NASD)

Date Initiated: 11/24/2004



Docket/Case Number: C8A040107

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 11/24/2004

Sanctions Ordered: Censure
Monetary/Fine \$10,000.00

Other Sanctions Ordered:

Sanction Details: FINE: \$10,000, PAID ON 12/13/04.

Disclosure 116 of 128

Reporting Source: Regulator

Current Status: Final

Allegations: MSRB RULES G-14 AND G-27 - RAYMOND JAMES FINANCIAL SERVICES, INC. FAILED TO ACCURATELY REPORT 3,740 (48%) OF 7,812 MUNICIPAL TRANSACTIONS REPORTED DURING THE PERIOD OF OCTOBER 1, 2002 THROUGH DECEMBER 31, 2002 IN THAT IT IMPROPERLY DESIGNATED THE RAYMOND JAMES & ASSOCIATES AS BOTH THE BUYER AND SELLER ON MUNICIPAL BOND TRANSACTIONS WHERE RAYMOND JAMES FINANCIAL SERVICES, INC. WAS A PARTY TO THE TRANSACTIONS. THE FIRM FURTHER FAILED TO ADOPT, MAINTAIN AND ENFORCE SUPERVISORY PROCEDURES REASONABLY DESIGNED TO ENSURE COMPLIANCE WITH MSRB RULES RELATING TO TRADE REPORTING IN THAT IT FAILED, AMONG OTHER THINGS, TO PROPERLY TEST MUNICIPAL TRADE REPORTS FOR ACCURACY.

Initiated By: NASD

Date Initiated: 10/15/2004

Docket/Case Number: C07040085

Principal Product Type: Debt - Municipal

Other Product Type(s):



Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/15/2004

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 \$12,500.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAYMOND JAMES FINANCIAL SERVICES, INC CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED AND FINED \$12,500.

Reporting Source: Firm

Current Status: Final

Allegations: NASD ALLEGES THAT BETWEEN OCTOBER 1, 2002 AND DECEMBER 31, 2002, RESPONDENT FAILED TO ACCURATELY REPORT 3,740 OF 7,812 MUNICIPAL PRINCIPAL TRANSACTIONS. THE INACCURACY WAS THE RESULT OF A TECHNICAL ERROR THAT INCORRECTLY CODED OUR AFFILIATE, RAYMOND JAMES & ASSOCIATES INSTEAD OF RAYMOND JAMES FINANCIAL SERVICES AS THE PARTY TO THE TRANSACTION.

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

Date Initiated: 08/20/2004

Docket/Case Number: C07040085

Principal Product Type: Debt - Municipal

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)


Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/15/2004

Sanctions Ordered: Censure
Monetary/Fine \$12,500.00

Other Sanctions Ordered: N/A

Sanction Details: FINED \$12,500.

Firm Statement THE RESPONDENT, WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, AGREED TO AN ACCEPTANCE, WAIVER AND CONSENT AND A MONETARY FINE OF \$12,500 FOR FAILURE TO ACCURATELY REPORT CERTAIN MUNICIPAL BOND TRANSACTIONS FOR A PERIOD OF OCTOBER 1, 2002 TO DECEMBER 31, 2002.

Disclosure 117 of 128

Reporting Source: Firm

Current Status: Final

Allegations: THE NASD HAS ALLEGED THAT THE FIRM FAILED TO ADEQUATELY ENFORCE A SUPERVISORY SYSTEM AND WRITTEN SUPERVISORY PROCEDURES AS IT APPLIES TO NASD CONDUCT RULES 2110 AND 3010 (A) AND (B). THE ALLEGATIONS STEM FROM THE ACTION OF A FORMER FINANCIAL ADVISOR OF THE MEMBER FIRM WHO FAILED TO FOLLOW THE FIRM'S WRITTEN SUPERVISORY PROCEDURES AS IT RELATED TO DISCLOSING OUTSIDE BUSINESS ACTIVITIES AND MAINTAINING AN ACCOUNT WITH A FIRM CUSTOMER.

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS

Date Initiated: 07/16/2004

Docket/Case Number: C8A040107

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: 11/24/2004

Sanctions Ordered: Censure
Monetary/Fine \$10,000.00

Other Sanctions Ordered:

Sanction Details: FINED 10,000.00 PAID ON 10/11/2004.

PENALTY WAIVED-NONE

Firm Statement THE FIRM IS CURRENTLY REVIEWING THE PROPOSED AWC AND WILL RESPOND TO THE NASD ON OR BEFORE THE AUGUST 2, 2004 DEADLINE.

Disclosure 118 of 128

Reporting Source: Regulator

Current Status: Final

Allegations: ARTICLE V, SECTIONS 2(C) AND 3(B) OF NASD'S BY-LAWS, AND NASD RULES 2110, 3010 AND 3070 - RAYMOND JAMES FINANCIAL SERVICES, INC. ("RESPONDENT FIRM") FILED 350 LATE AMENDMENTS TO FORMS U4 AND U5, WHICH REPRESENTED APPROXIMATELY 60% OF THE REQUIRED AMENDMENTS RELATING TO REPORTABLE CUSTOMER COMPLAINTS, TERMINATIONS, REGULATORY ACTIONS, AND CRIMINAL DISCLOSURES. IN ADDITION, THE RESPONDENT FIRM FAILED TO FILE 13 FORMS U4/U5 AND FAILED TO REPORT APPROXIMATELY 200 REPORTABLE EVENTS PURSUANT TO NASD RULE 3070. DURING THE RELEVANT PERIOD, THE RESPONDENT FIRM'S SUPERVISORY SYSTEM AND PROCEDURES WERE NOT REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH ITS ARTICLE V REPORTING OBLIGATIONS.

Initiated By: NASD

Date Initiated: 11/30/2004

Docket/Case Number: CAF040095

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: 11/30/2004

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 \$400,000.00

Other Sanctions Ordered: UNDERTAKINGS

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RESPONDENT FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE, IT IS CENSURED AND FINED \$400,000, WHICH SHALL BE PAID WITHIN 10 DAYS OF NOTICE OF ACCEPTANCE OF THIS AWC. IN ADDITION RESPONDENT FIRM SHALL COMPLY WITH THE FOLLOWING UNDERTAKINGS: (1) PROMPTLY FOLLOWING NOTICE OF ACCEPTANCE OF THIS AWC, THE FIRM'S INTERNAL AUDIT DEPARTMENT OR PERSONNEL NOT DIRECTLY RESPONSIBLE FOR THE FIRM'S ARTICLE V REPORTING OBLIGATIONS AND THEIR IMMEDIATE SUPERVISORS SHALL CONDUCT AN AUDIT TO ASSESS THE EFFECTIVENESS OF ITS SYSTEM AND PROCEDURES FOR ENSURING TIMELY FILING OF FORM U4 AND U5 AMENDMENTS SUMMARIZING FINDINGS AND RECOMMENDATIONS AND SHALL FOR THE NEXT FOUR CALENDAR QUARTERS BEGINNING FOURTH QUARTER 2004, CONDUCT A SIMILAR AUDIT AND PREPARE A SIMILAR WRITTEN AUDIT REPORT. (2) NO LATER THAN 90 DAYS AFTER NOTICE OF ACCEPTANCE OF THIS AWC, AN OFFICER OF THE FIRM SHALL CERTIFY IN WRITING TO NASD THAT AN AUDIT WAS CONDUCTED AND THE OFFICER HAS REVIEWED THE CURRENT AUDIT REPORT. (3) NO LATER THAN 60 DAYS AFTER THE DATE OF THE CURRENT AUDIT REPORT, AN OFFICER SHALL CERTIFY IN WRITING TO NASD THAT THE FIRM HAS IMPLEMENTED, OR HAS BEGUN TO IMPLEMENT, ANY RECOMMENDATIONS WITHIN A SPECIFIED TIME PERIOD. (4) NO LATER THAN 60 DAYS AFTER THE LAST DAY OF THE NEXT FOUR QUARTERS, AN OFFICER SHALL CERTIFY IN WRITING TO NASD THAT AN AUDIT WAS CONDUCTED, THE CURRENT AUDIT REPORT WAS REVIEWED, AND RECOMMENDATIONS IMPLEMENTED, OR BEGUN TO BE IMPLEMENTED. (5) NO LATER THAN SIX MONTHS AFTER NOTICE OF ACCEPTANCE OF THIS AWC, AN OFFICER SHALL CERTIFY IN WRITING TO NASD THAT THE FIRM HAS REVIEWED ITS SYSTEM AND PROCEDURES FOR COMPLYING WITH ITS ARTICLE V REPORTING OBLIGATIONS AND HAS ESTABLISHED A SYSTEM AND PROCEDURES REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH REPORTING REQUIREMENTS SET FORTH THEREIN.



Reporting Source: Firm

Current Status: Final

Allegations: ON JUNE 25, 2004, THE NASD ADVISED THAT IT HAS MADE A PRELIMINARY DETERMINATION TO RECOMMEND THAT DISCIPLINARY ACTION BE BROUGHT AGAINST RJFS IN CONNECTION WITH NUMEROUS LATE FILINGS OR AMENDMENTS OF FORM U-4S AND U-5S. THE APPLICABLE TIME PERIOD IS JANUARY 1, 2002 THROUGH MARCH 5, 2004.

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

Date Initiated: 06/25/2004

Docket/Case Number: CAF040095

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: 11/30/2004

Sanctions Ordered: Censure
Monetary/Fine \$400,000.00

Other Sanctions Ordered: UNDERTAKINGS

Sanction Details: FINE: \$400,000.00; PAID: 12/6/04.

Disclosure 119 of 128

Reporting Source: Regulator

Current Status: Final

Allegations: SEC ADMINISTRATIVE PROCEEDING RELEASE NO. 33-8499, SECURITIES EXCHANGE ACT 34-50476, INVESTMENT ADVISERS ACT 40-2309, DATED SEPTEMBER 30, 2004; THE SECURITIES AND EXCHANGE COMMISSION COMPLAINT ALLEGES THAT RAYMOND JAMES COMMITTED FRAUD BASED ON THE FRAUDULENT ACTS ONE OF ITS REGISTERED REPRESENTATIVES, AND ALSO CHARGES RAYMOND JAMES FAILING REASONABLY TO SUPERVISE. THE DIVISION ALLEGES THAT IN HIS CAPACITY AS A RAYMOND



JAMES REGISTERED REPRESENTATIVE DURING 1999 AND 2000 AND AS PART OF A FRAUDULENT SCHEME, AN EMPLOYEE MADE NUMEROUS FALSE REPRESENTATIONS TO SOLICIT INVESTORS, WHO DEPOSITED APPROXIMATELY \$44.5 MILLION IN A BROKERAGE. THE DIVISION ALSO ALLEGES THAT RAYMOND JAMES COMMITTED DIRECT VIOLATIONS OF THE ANTIFRAUD PROVISIONS OF THE FEDERAL SECURITIES LAWS BASED ON ITS EMPLOYEE ACTIVITIES, AND CHARGES RAYMOND JAMES WITH FAILING REASONABLY TO SUPERVISE BY FAILING TO ESTABLISH PROCEDURES OR SYSTEMS TO IMPLEMENT EXISTING PROCEDURES CONCERNING THE SUPERVISION OF REGISTERED REPRESENTATIVES WHO WORKED AWAY FROM THE OFFICE, HEIGHTENED SUPERVISION OF REGISTERED REPRESENTATIVES, MONITORING OR AUDITING OPERATING ACCOUNTS OF BRANCH OFFICES, AND INVESTIGATION OF FUND TRANSFERS. THE DIVISION ALLEGES THAT AS A RESULT OF FIRM EMPLOYEE'S FRAUDULENT CONDUCT, RAYMOND JAMES VIOLATED SECTION 17(A) OF THE SECURITIES ACT AND SECTION 10(B) OF THE EXCHANGE ACT AND RULE 10B-5 THEREUNDER. THE DIVISION ALSO ALLEGES THAT RAYMOND JAMES FAILED REASONABLY TO SUPERVISE AN EMPLOYEE, A PERSON SUBJECT TO THEIR SUPERVISION, WITH A VIEW TO PREVENTING OR DETECTING VIOLATIONS OF SECTION 17(A) OF THE SECURITIES ACT AND SECTION 10(B) OF THE EXCHANGE ACT AND RULE 10B-5 THEREUNDER. ACCORDING TO THE ORDER, RAYMOND JAMES ALSO VIOLATED SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-4 THEREUNDER BY FAILING TO PRESERVE FOR THREE YEARS, THE FIRST TWO YEARS IN AN ACCESSIBLE PLACE, ELECTRONIC MAIL COMMUNICATIONS, AND BY FAILING TO PROMPTLY FURNISH CERTAIN ELECTRONIC MAIL COMMUNICATIONS TO THE COMMISSION.

Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	09/30/2004
Docket/Case Number:	3-11692
Principal Product Type:	Other
Other Product Type(s):	UNSPECIFIED TYPE OF SECURITIES
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	DISGORGEMENT; CIVIL PENALTIES
Resolution:	Order
Resolution Date:	11/21/2005
Does the order constitute a	No



final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?

Sanctions Ordered: Monetary/Fine \$6,900,000.00
Disgorgement/Restitution

Other Sanctions Ordered:

Sanction Details: SEC ADM. REL. 33-8636, SEC ACT 34-52810, NOVEMBER 21, 2005; NOTICE IS GIVEN, PURSUANT TO RULE 360(E) OF THE COMMISSION'S RULES OF PRACTICE, THAT THE INITIAL DECISION OF THE ADMINISTRATIVE LAW JUDGE HAS BECOME THE FINAL DECISION OF THE COMMISSION WITH RESPECT TO RAYMOND JAMES FINANCIAL SERVICES, INC.
THE ORDERS CONTAINED IN THAT DECISION HEREBY DECLARED EFFECTIVE. THE ORDERS IN THE INITIAL DECISION REQUIRED THAT RAYMOND JAMES DISGORGE \$5,866.25, PLUS PREJUDGMENT INTEREST FROM JANUARY 1, 2001, THROUGH THE LAST DAY OF THE MONTH PRECEDING THE MONTH IN WHICH PAYMENT IS MADE; PAY A CIVIL PENALTY OF \$6,900,000; FAIR FUND PURSUANT TO RULE 1100 OF THE COMMISSION'S RULES OF PRACTICE SHALL BE ESTABLISHED; THE ALLEGATION THAT RAYMOND JAMES VIOLATED SECTION 17(A)(1) OF THE SECURITIES EXCHANGE ACT OF 1934 AND EXCHANGE ACT RULE 17A-4 BE DISMISSED; AND THAT THE REQUEST OF THE DIVISION OF ENFORCEMENT THAT RAYMOND JAMES BE ORDERED TO CEASE AND DESIST FROM VIOLATIONS OF SECTION 17(A) OF THE SECURITIES ACT OF 1933 AND SECTIONS 10(B) AND 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 AND EXCHANGE ACT RULES 10B-5 AND 17A-4 BE DENIED.

Regulator Statement INITIAL DECISION; PURSUANT TO SECTION 8A(E) OF THE SECURITIES ACT OF 1933, SECTION 21C(E) OF THE SECURITIES EXCHANGE ACT OF 1934, AND SECTION 203(J) OF THE INVESTMENT ADVISERS ACT OF 1940, IS ORDERED THAT THE FIRM SHALL DISGORGE \$5,866.25, PLUS PREJUDGMENT INTEREST; PURSUANT TO SECTION 21B OF THE SECURITIES ACT OF 1934 AND SECTION 203(I) OF THE INVESTMENT ADVISERS ACT OF 1940, SHALL PAY A CIVIL PENALTY OF \$6,900,000.00.

Reporting Source: Firm

Current Status: Final

Allegations: SEC ADMINISTRATIVE PROCEEDING RELEASE NO. 33-8499, SECURITIES EXCHANGE ACT 34-50476, INVESTMENT ADVISERS ACT 40-2309, DATED SEPTEMBER 30, 2004; THE SECURITIES AND EXCHANGE COMMISSION



COMPLAINT ALLEGES THAT RAYMOND JAMES COMMITTED FRAUD BASED ON THE FRAUDULENT ACTS ONE OF ITS REGISTERED REPRESENTATIVES, AND ALSO CHARGES RAYMOND JAMES FAILING REASONABLY TO SUPERVISE. THE DIVISION ALLEGES THAT IN HIS CAPACITY AS A RAYMOND JAMES REGISTERED REPRESENTATIVE DURING 1999 AND 2000 AND AS PART OF A FRAUDULENT SCHEME, AN EMPLOYEE MADE NUMEROUS FALSE REPRESENTATIONS TO SOLICIT INVESTORS, WHO DEPOSITED APPROXIMATELY \$44.5 MILLION IN A BROKERAGE. THE DIVISION ALSO ALLEGES THAT RAYMOND JAMES COMMITTED DIRECT VIOLATIONS OF THE ANTIFRAUD PROVISIONS OF THE FEDERAL SECURITIES LAWS BASED ON ITS EMPLOYEE ACTIVITIES, AND CHARGES RAYMOND JAMES WITH FAILING REASONABLY TO SUPERVISE BY FAILING TO ESTABLISH PROCEDURES OR SYSTEMS TO IMPLEMENT EXISTING PROCEDURES CONCERNING THE SUPERVISION OF REGISTERED REPRESENTATIVES WHO WORKED AWAY FROM THE OFFICE, HEIGHTENED SUPERVISION OF REGISTERED REPRESENTATIVES, MONITORING OR AUDITING OPERATING ACCOUNTS OF BRANCH OFFICES, AND INVESTIGATION OF FUND TRANSFERS. THE DIVISION ALLEGES THAT AS A RESULT OF FIRM EMPLOYEE'S FRAUDULENT CONDUCT, RAYMOND JAMES VIOLATED SECTION 17(A) OF THE SECURITIES ACT AND SECTION 10(B) OF THE EXCHANGE ACT AND RULE 10B-5 THEREUNDER. THE DIVISION ALSO ALLEGES THAT RAYMOND JAMES FAILED REASONABLY TO SUPERVISE AN EMPLOYEE, A PERSON SUBJECT TO THEIR SUPERVISION, WITH A VIEW TO PREVENTING OR DETECTING VIOLATIONS OF SECTION 17(A) OF THE SECURITIES ACT AND SECTION 10(B) OF THE EXCHANGE ACT AND RULE 10B-5 THEREUNDER. ACCORDING TO THE ORDER, RAYMOND JAMES ALSO VIOLATED SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-4 THEREUNDER BY FAILING TO PRESERVE FOR THREE YEARS, THE FIRST TWO YEARS IN AN ACCESSIBLE PLACE, ELECTRONIC MAIL COMMUNICATIONS, AND BY FAILING TO PROMPTLY FURNISH CERTAIN ELECTRONIC MAIL COMMUNICATIONS TO THE COMMISSION.

Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	04/24/2003
Docket/Case Number:	03-11692
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	DISGORGEMENT; CIVIL PENALTIES
Resolution:	Decision



Resolution Date:	09/15/2005
Sanctions Ordered:	Monetary/Fine \$6,900,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	
Sanction Details:	EXCHANGE ACT OF 1934, AND SECTION 203(J) OF THE INVESTMENT ADVISERS ACT OF 1940, IS ORDERED THAT THE FIRM SHALL DISGORGE \$5,866.25, PLUS PREJUDGMENT INTEREST; PURSUANT TO SECTION 21B OF THE SECURITIES ACT OF 1934 AND SECTION 203(I) OF THE INVESTMENT ADVISERS ACT OF 1940, SHALL PAY A CIVIL PENALTY OF \$6,900,000.00.
Firm Statement	THE ADMINISTRATIVE LAW JUDGE DENIED THE COMMISSION'S REQUEST FOR A CEASE AND DESIST ORDER. THE JUDGE FURTHER REFUSED TO ORDER AN INDEPENDENT CONSULTANT TO REVIEW COMPLIANCE AND SUPERVISORY PROCEDURES. THE COMMISSION'S REQUEST FOR A MORATORIUM ON RECRUITING OF FINANCIAL ADVISORS AND OPENING OF NEW BRANCH OFFICES WAS LIKEWISE DENIED. ALL CHARGES RELATED TO PRESERVATION OF EMAIL WERE DISMISSED. WHILE THE COMMISSION SOUGHT UP TO \$31 MILLION IN DISGORGEMENT, THE JUDGE REDUCED THAT AMOUNT TO \$5,866.25.

Disclosure 120 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	NASD RULE 2110 - RESPONDENT MEMBER SOLD SHARES ISSUED BY MUTUAL FUNDS WITHOUT PROVIDING CERTAIN CUSTOMERS WITH BREAKPOINT DISCOUNTS DESCRIBED IN THE PROSPECTUSES OF THE FUNDS; FAILED TO GIVE ITS CUSTOMERS BREAKPOINT DISCOUNTS IN 31.78% OF ELIGIBLE MUTUAL FUND TRANSACTIONS IN 2001 AND 2002 THAT RESULTED IN MISSED BREAKPOINTS THAT WOULD HAVE REDUCED CUSTOMERS' CHARGES BY AT LEAST \$2.5 MILLION ON THEIR PURCHASES OF MUTUAL FUND SHARES WITH FRONT-END LOADS DURING THE RELEVANT PERIOD.
Initiated By:	NASD
Date Initiated:	02/12/2004
Docket/Case Number:	CAF040006
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	



Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 02/12/2004

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 \$1,297,564.50

Other Sanctions Ordered: UNDERTAKINGS.

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RESPONDENT FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED, FINED \$2,595,129, OF WHICH ONE HALF SHALL BE PAID TO NASD AND ONE HALF SHALL BE PAID TO THE U.S. TREASURY PURSUANT TO RELATED SEC PROCEEDINGS BEING INSTITUTED AGAINST RESPONDENT ON THIS DATE, AND REQUIRED TO PROVIDE WRITTEN NOTIFICATION TO EACH CUSTOMER WHO PURCHASED FRONT-END LOAD MUTUAL FUNDS THROUGH THE FIRM FROM JANUARY 1, 1999 THROUGH NOVEMBER 3, 2003 THAT THE FIRM EXPERIENCED A PROBLEM DELIVERING BREAKPOINT DISCOUNTS AND THAT AS A RESULT, THE CUSTOMER MAY BE ENTITLED TO A REFUND; PERFORM A TRADE-BY-TRADE ANALYSIS OF ALL FRONT-END LOAD MUTUAL FUND PURCHASES OF \$2,500 OR MORE AND ALL OVERCHARGES IDENTIFIED REFUNDED BY MARCH 31, 2004; PROVIDE REFUNDS TO ALL CUSTOMERS WHO DID NOT RECEIVE ALL APPLICABLE BREAKPOINT DISCOUNTS AS DESCRIBED IN NTM 03-47; PROVIDE NASD A REPORT ON RESPONDENT'S REFUND PROGRAM BY 4/16/04; AND NOT LATER THAN SIX MONTHS AFTER THE DATE OF THIS ORDER, RESPONDENT'S CHIEF EXECUTIVE OFFICER SHALL CERTIFY IN WRITING TO NASD THAT RESPONDENT HAS IMPLEMENTED PROCEDURES AND A SYSTEM FOR APPLYING SUCH PROCEDURES THAT CAN REASONABLY BE EXPECTED TO PREVENT AND DETECT FAILURES TO PROVIDE BREAKPOINT DISCOUNTS FOR WHICH CUSTOMERS ARE ELIGIBLE ON PURCHASES OF FRONT-END LOAD MUTUAL FUNDS.



Reporting Source: Firm

Current Status: Final

Allegations: DURING 2001 AND 2002, RESPONDENT SOLD SHARES ISSUED BY MUTUAL FUNDS WITHOUT PROVIDING CERTAIN CUSTOMERS WITH THE REDUCTION IN THE FRONT-END LOADS, OR SALES CHARGES, ALSO KNOWN AS "BREAKPOINT" DISCOUNTS, DESCRIBED IN THE PROSPECTUSES OF THE FUNDS.

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS

Date Initiated: 11/04/2003

Docket/Case Number: CAF 040006

Principal Product Type: Mutual Fund(s)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: CENSURE; DISGORGEMENT; UNDERTAKING

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 02/05/2004

Sanctions Ordered: Censure
Monetary/Fine \$1,297,564.50

Other Sanctions Ordered: UNDERTAKING

Sanction Details: FINED \$1,297,564.50; PAID 2/20/2004

Firm Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RESPONDENT FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED, FINED \$2,595,129, AND REQUIRED TO PROVIDE WRITTEN NOTIFICATION TO EACH CUSTOMER WHO PURCHASED FRONT-END LOAD MUTUAL FUNDS THROUGH THE FIRM FROM JANUARY 1, 1999 THROUGH NOVEMBER 3, 2003 THAT THE FIRM EXPERIENCED A PROBLEM DELIVERING BREAKPOINT DISCOUNTS AND THAT AS A RESULT, THE CUSTOMER MAY BE ENTITLED TO A REFUND; PERFORM A TRADE-BY-TRADE ANALYSIS OF ALL FRONT-END LOAD MUTUAL FUND PURCHASES OF \$2,500 OR MORE AND ALL OVERCHARGES IDENTIFIED REFUNDED BY MARCH 31, 2004; PROVIDE REFUNDS TO ALL CUSTOMERS WHO DID NOT RECEIVE ALL APPLICABLE BREAKPOINT DISCOUNTS AS DESCRIBED IN NTM 03-47; PROVIDE NASD A REPORT ON RESPONDENT'S REFUND PROGRAM BY 4/16/04; AND NOT LATER THAN SIX MONTHS AFTER THE DATE OF THIS ORDER, RESPONDENT'S CHIEF



EXECUTIVE OFFICER SHALL CERTIFY IN WRITING TO NASD THAT RESPONDENT HAS IMPLEMENTED PROCEDURES AND A SYSTEM FOR APPLYING SUCH PROCEDURES THAT CAN REASONABLY BE EXPECTED TO PREVENT AND DETECT FAILURES TO PROVIDE BREAKPOINT DISCOUNTS FOR WHICH CUSTOMERS ARE ELIGIBLE ON PURCHASES OF FRONT-END LOAD MUTUAL FUNDS.

Disclosure 121 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	SEC ADMIN PROCEEDING FILE NO. 3-11404, RELS 33-8374, 34-49234, DATED FEBRUARY 12, 2004 - THE SECURITIES AND EXCHANGE COMMISSION ("COMMISSION") DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS BE, AND HEREBY ARE, INSTITUTED PURSUANT TO SECTION 8A OF THE SECURITIES ACT OF 1933 ("SECURITIES ACT") AND SECTION 15(B)(4) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AGAINST RAYMOND JAMES FINANCIAL SERVICES, INC. ("RESPONDENT"). IN ANTICIPATION OF THE INSTITUTION OF THESE PROCEEDINGS, RESPONDENT HAS SUBMITTED AN OFFER OF SETTLEMENT (THE "OFFER") WHICH THE COMMISSION HAS DETERMINED TO ACCEPT.
Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	02/12/2004
Docket/Case Number:	SEC ADMIN FILE NO. 3-11404/REL 33-8374
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	02/12/2004



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 \$1,297,564.00
Disgorgement/Restitution
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details:

IT IS HEREBY ORDERED: PURSUANT TO SECTION 15(B)(4) OF THE EXCHANGE ACT, THAT RESPONDENT IS CENSURED; PURSUANT TO SECTION 8A OF THE SECURITIES ACT, THAT RESPONDENT SHALL CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 17(A)(2) OF THE SECURITIES ACT; WITHIN 10 DAYS OF THE ENTRY OF THIS ORDER, RESPONDENT SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$1,297,564 TO THE UNITED STATES TREASURY. RESPONDENT SHALL PAY DISGORGEMENT AND PREJUDGMENT INTEREST, WHICH OBLIGATION SHALL BE SATISFIED BY COMPLIANCE WITH THE CUSTOMER REFUND PROGRAM SUMMARIZED IN THE ORDER, AND MORE FULLY SET FORTH IN NASD'S RELATED ORDER; AND NOT LATER THAN 6 MONTHS AFTER THE DATE OF THIS ORDER, UNLESS OTHERWISE EXTENDED BY THE STAFF OF THE COMMISSION FOR GOOD CAUSE SHOWN, RESPONDENT'S CHIEF EXECUTIVE OFFICER SHALL CERTIFY IN WRITING TO THE STAFF OF THE COMMISSION THAT RESPONDENT HAS IMPLEMENTED PROCEDURES, AND A SYSTEM FOR APPLYING SUCH PROCEDURES, THAT CAN REASONABLY BE EXPECTED TO PREVENT AND DETECT FAILURES BY RESPONDENT TO PROVIDE APPROPRIATE BREAKPOINT DISCOUNTS FOR WHICH CUSTOMERS ARE ELIGIBLE ON PURCHASES OF FRONT-END LOAD MUTUAL FUNDS, BASED ON INFORMATION REASONABLY ASCERTAINABLE BY RESPONDENT.

Regulator Statement

DURING 2001 AND 2002 (THE "RELEVANT PERIOD"), RESPONDENT SOLD SHARES ISSUED BY MUTUAL FUNDS WITHOUT PROVIDING CERTAIN CUSTOMERS WITH THE REDUCTIONS IN FRONT-END LOADS, OR SALES CHARGES, ALSO KNOWN AS "BREAKPOINT" DISCOUNTS, DESCRIBED IN THE PROSPECTUSES OF THE FUNDS. ACCORDING TO DATA SUBMITTED TO NASD BY RESPONDENT, RESPONDENT IS ESTIMATED TO HAVE FAILED TO GIVE CERTAIN CUSTOMERS BREAKPOINT DISCOUNTS TOTALING APPROXIMATELY \$2,595,129 DURING THE RELEVANT PERIOD. BY FAILING TO DISCLOSE TO CERTAIN CUSTOMERS THAT THEY WERE NOT RECEIVING THE BENEFIT OF APPLICABLE BREAKPOINT DISCOUNTS, RESPONDENT



VIOLATED SECTION 17(A)(2) OF THE SECURITIES ACT.

Reporting Source:	Firm
Current Status:	Final
Allegations:	DURING 2001 AND 2002, RESPONDEANT SOLD SHARES ISSUED BY MUTUAL FUNDS WITHOUT PROVIDING CERTAIN CUSTOMERS WITH THE REDUCTION IN THE FRONT-END LOADS, OR SALES CHARGES, ALSO KNOWN AS "BREAKPOINT" DISCOUNTS, DESCRIBED IN THE PROSPECTUSES OF THE FUNDS.
Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	11/05/2003
Docket/Case Number:	3-11404
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST; CENSURE; DISGORGEMENT; UNDERTAKING
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	02/12/2004
Sanctions Ordered:	Censure Monetary/Fine \$1,297,564.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	FINED \$1,297,564.00; PAID 2/20/2004
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RESPONDENT FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED, FINED \$2,595,129, AND REQUIRED TO PROVIDE WRITTEN NOTIFICATION TO EACH CUSTOMER WHO PURCHASED FRONT-END LOAD MUTUAL FUNDS THROUGH THE FIRM FROM JANUARY 1, 1999 THROUGH NOVEMBER 3, 2003 THAT THE FIRM EXPERIENCED A PROBLEM DELIVERING BREAKPOINT DISCOUNTS AND THAT AS A RESULT, THE CUSTOMER MAY BE ENTITLED TO A REFUND; PERFORM A TRADE-BY-TRADE ANALYSIS OF ALL FRONT-END LOAD



MUTUAL FUND PURCHASES OF \$2,500 OR MORE AND ALL OVERCHARGES IDENTIFIED REFUNDED BY MARCH 31, 2004; PROVIDE REFUNDS TO ALL CUSTOMERS WHO DID NOT RECEIVE ALL APPLICABLE BREAKPOINT DISCOUNTS AS DESCRIBED IN NTM 03-47; PROVIDE NASD A REPORT ON RESPONDENT'S REFUND PROGRAM BY 4/16/04; AND NOT LATER THAN SIX MONTHS AFTER THE DATE OF THIS ORDER, RESPONDENT'S CHIEF EXECUTIVE OFFICER SHALL CERTIFY IN WRITING TO NASD THAT RESPONDENT HAS IMPLEMENTED PROCEDURES AND A SYSTEM FOR APPLYING SUCH PROCEDURES THAT CAN REASONABLY BE EXPECTED TO PREVENT AND DETECT FAILURES TO PROVIDE BREAKPOINT DISCOUNTS FOR WHICH CUSTOMERS ARE ELIGIBLE ON PURCHASES OF FRONT-END LOAD MUTUAL FUNDS.

Disclosure 122 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	NASD RULES 2110, 3070 - WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, THE RESPONDENT MEMBER CONSENTED TO THE ENTRY OF FINDINGS THAT IT FAILED TO REPORT STATISTICAL AND SUMMARY INFORMATION CONCERNING CUSTOMER COMPLAINTS IT RECEIVED.
Initiated By:	NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
Date Initiated:	08/26/2002
Docket/Case Number:	C07020068
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:	08/26/2002
Sanctions Ordered:	Censure Monetary/Fine \$10,000.00
Other Sanctions Ordered:	
Sanction Details:	CENSURED AND FINED \$10,000



Reporting Source:	Firm
Current Status:	Final
Allegations:	NASD RULES 2110, 3070 - WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, THE RESPONDENT MEMBER CONSENTED TO THE ENTRY OF FINDINGS THAT IT FAILED TO REPORT STATISTICAL AND SUMMARY INFORMATION CONCERNING CUSTOMER COMPLAINTS IT RECEIVED.
Initiated By:	NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
Date Initiated:	08/26/2002
Docket/Case Number:	C07020068
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	FINE \$10,000.
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	08/26/2002
Sanctions Ordered:	Censure Monetary/Fine \$10,000.00
Other Sanctions Ordered:	
Sanction Details:	CENSURE & FINE \$10,000. PAID AUGUST 26, 2002
Firm Statement	CENSURED AND FINED \$10,000.

Disclosure 123 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	FAILURE TO REASONABLY SUPERVISE FORMER REPRESENTATIVE ROUBEN M. HALIMA WITH RESPECT TO BROKERAGE ACCOUNT OF A SPECIFIC CUSTOMER.
Initiated By:	MARYLAND DIVISION OF SECURITIES
Date Initiated:	07/31/2002



Docket/Case Number: 2000-0549

URL for Regulatory Action:

Principal Product Type: Options

Other Product Type(s): STOCK

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: FINE

Resolution: Stipulation and Consent

Resolution Date: 07/31/2002

Sanctions Ordered: Censure
Monetary/Fine \$7,000.00

Other Sanctions Ordered:

Sanction Details: RESPONDENT SHALL CONTINUE TO MAINTAIN AND SHALL ENFORCE POLICIES DESIGNED TO SUPERVISE REPRESENTATIVES AND TO HIRE REPRESENTATIVES WITH REPUTABLE BACKGROUNDS

Regulator Statement THE DIVISION ALLEGED THAT RESPONDENT'S REPRESENTATIVE EXCESSIVELY TRADED A CUSTOMER'S ACCOUNT, EARNING COMMISSIONS IN EXCESS OF \$80,000 OVER AN APPROXIMATE 2-YEAR PERIOD.

Reporting Source: Firm

Current Status: Final

Allegations: INVESTIGATION INTO SUPERVISORY ACTIVITIES OVER FORMER REGISTERED REPRESENTATIVE.

Initiated By: STATE OF MARYLAND

Date Initiated: 07/11/2000

Docket/Case Number: 2000-0549

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:



Resolution: Consent
Resolution Date: 07/24/2002
Sanctions Ordered: Censure
Monetary/Fine \$7,000.00
Other Sanctions Ordered:
Sanction Details: \$7,000. PAID 7/24/02

Disclosure 124 of 128

Reporting Source: Firm
Current Status: Final
Allegations: THE COMMONWEALTH OF VIRGINIA ALLEGES RJFS AND REP JOHN AMICK ARE IN VIOLATION OF VIRGINIA SECURITIES ACT RULE 21.
Initiated By: STATE OF VA
Date Initiated: 02/06/2007
Docket/Case Number: N/A
Principal Product Type: No Product
Other Product Type(s):
Principal Sanction(s)/Relief Sought:
Other Sanction(s)/Relief Sought:
Resolution: Other
Resolution Date: 04/16/2008
Sanctions Ordered:
Other Sanctions Ordered: N/A
Sanction Details: RECEIVED NOTIFICATION FROM THE STATE OF COMMONWEALTH OF VIRGINIA BY LETTER DATED 04/16/2008. NO FURTHER ACTION BY THE DIVISION IS WARRANTED AT THIS TIME.
Firm Statement RECEIVED NOTIFICATION FROM THE STATE OF COMMONWEALTH OF VIRGINIA BY LETTER DATED 04/16/2008. NO FURTHER ACTION BY THE DIVISION IS WARRANTED AT THIS TIME.



Disclosure 125 of 128

Reporting Source:	Firm
Current Status:	Final
Allegations:	THE STATE OF NORTH DAKOTA ALLEGED THAT FIRM OFFERED INVESTMENTS IN ROYAL CROWN CORP. BONDS TO RESIDENTS OF ND WHILE INVESTMENTS WERE NOT REGISTERED OR EXEMPT UNDER ND LAW.
Initiated By:	STATE OF NORTH DAKOTA
Date Initiated:	12/31/1996
Docket/Case Number:	
Principal Product Type:	Debt - Corporate
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	06/12/1997
Sanctions Ordered:	Monetary/Fine \$2,000.00
Other Sanctions Ordered:	
Sanction Details:	\$2,000. FINE PAID TO STATE OF NORTH DAKOTA RECEIPT ISSUED ON 7/15/97.
Firm Statement	CONSENT ORDER FROM STATE OF NORTH DAKOTA AND \$2,000. FINE.

Disclosure 126 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	INVESTMENT MANAGEMENT & RESEARCH, INC., IN VIOLATION OF SECTION 13.1-504C OF THE CODE OF VIRGINIA, EMPLOYED FREDERICK SCOTT VALPEY AS AN UNREGISTERED INVESTMENT ADVISOR REPRESENTATIVE.
Initiated By:	VIRGINIA - STATE CORPORATION COMMISSION



DIVISION OF SECURITIES

Date Initiated: 06/23/1998

Docket/Case Number: SEC980038

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: 06/23/1998

Sanctions Ordered: Monetary/Fine \$1,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS ASSESSED A PENALTY IN THE AMOUNT OF \$1,000 AND WAS CHARGED FOR COSTS OF INVESTIGATION IN THE AMOUNT OF \$85.00.

Regulator Statement CONTACT: SEAN A. ABBOTT, INVESTMENT ADVISOR EXAMINER, 804-371-9528.

Reporting Source: Firm

Current Status: Final

Allegations: THAT AN INVESTMENT ADVISOR REPRESENTATIVE WAS NOT LICENSED IN THE STATE OF VIRGINIA

Initiated By: COMMONWEALTH OF VIRGINIA, DIV. OF SECURITIES

Date Initiated: 06/23/1998

Docket/Case Number: SEC 980038

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other



Other Sanction(s)/Relief Sought:	PAY COSTS OF THE COMMISSION'S INVESTIGATION.
Resolution:	Settled
Resolution Date:	06/23/1998
Sanctions Ordered:	Monetary/Fine \$1,000.00
Other Sanctions Ordered:	REIMBURSE COSTS - \$85.00
Sanction Details:	FULL AMOUNT, \$1,085.00 PAID TO COMMONWEALTH ON JUNE 23, 1998.
Firm Statement	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, INVESTMENT MANAGEMENT & RESARCH, INC. (NOW RAYMOND JAMES FINANCIAL SERVICES, INC.) PAID \$1,000. FINE PLUS \$85. TO REIMBURSE THE COMMISSION FOR THE COST OF INVESTIGATION.

Disclosure 127 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	ALLEGING VIOLATIONS OF ARTICLE III, SECTIONS 1, 2, AND 27 OF THE RULES OF FAIR PRACTICE THAT KRULL RECOMMENDED PURCHASE AND REDEMPTION OF MUTUAL FUND SHARES IN 10 ACCOUNTS OF EIGHT PUBLIC CUSTOMERS WITHOUT REASONABLE GROUNDS THAT TRANSACTIONS WERE SUITABLE FOR CUSTOMERS IN VIEW OF ITS FREQUENCY, INVESTMENT BE REDEEMED OR PURCHASED AND CUSTOMERS' FINANCIAL SITUATIONS, CIRCUMSTANCES, AND NEEDS; AND IN CONNECTION WITH ABOVE-REFERENCED ACTIVITY, MEMBER ACTING THROUGH GREENE AND DIGIROLAMO, FAILED TO ENSURE KRULL'S SALES ACTIVITIES WERE ADEQUATELY REVIEWED AND MONITORED TO ENSURE SALES ACTIVITIES WERE NOT IN CONTRAVENTION OF NASD'S RULES OF FAIR PRACTICE.
Initiated By:	NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
Date Initiated:	12/21/1994
Docket/Case Number:	C3B940028
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	



Other Sanction(s)/Relief Sought:

Resolution: Decision

Resolution Date: 11/24/1997

Sanctions Ordered: Censure
Monetary/Fine \$10,000.00
Disgorgement/Restitution
Suspension

Other Sanctions Ordered:

Sanction Details: FINED,CENSURED AND SUSPENDED.

Regulator Statement [TOP]COMPLAINT NO. C3B940028 FILED12/ 21/ 94 BY DISTRICT NO.3 AGAINST INVESTMENT MANAGEMENT & RESEARCH, MILTON ANTHONYGREENE, KENNETH CRAIG KRULL AND MICHAEL JOHN DIGIROLAMOALLEGING VIOLATIONS OF ARTICLE III, SECTIONS 1, 2, AND 27 OFTHE RULES OF FAIR PRACTICE THAT KRULL RECOMMENDED PURCHASE AND REDEMPTION OF MUTUAL FUND SHARES IN 10ACCOUNTS OF EIGHT PUBLIC CUSTOMERS WITHOUT REASONABLEGROUNDS THAT TRANSACTIONS WERE SUITABLE FOR CUSTOMERS IN VIEW OF ITS FREQUENCY, INVESTMENT BE REDEEMED OR PURCHASED AND CUSTOMERS' FINANCIAL SITUATIONS,CIRCUMSTANCES, AND NEEDS; AND IN CONNECTION WITH ABOVE-REFERENCED ACTIVITY, MEMBER ACTING THROUGH GREENE AND DIGIROLAMO, FAILED TO ENSURE KRULL'S SALES ACTIVITIES WERE ADEQUATELY REVIEWED AND MONITORED TO ENSURE SALES ACTIVITIES WERE NOT IN CONTRAVENTION OF NASD'S RULES OF FAIR PRACTICE; AND FAILED TO HAVE IN PLACE ADEQUATE WRITTEN OR UNWRITTEN SUPERVISORYPROCEDURES AND/OR SYSTEMS GOVERNING REVIEW AND ENDORSEMENTBY REGISERED PRINCIPAL IN WRITING ON AN INTERNAL RECORD ALLTRANSACTIONS PERTAINING TOTHE SOLICITATION AND EXECUTION OF ANY SECURITIES TRANSACTIONS,INCLUDING PROCEDURES DESIGNED TO PREVENT AND DETECT SWITCHING AND SHORT TERM TRADING OF MUTUAL FUNDS BY REGISTERED PERSONSINCLUDING ITS OSJ GENERAL PRINCIPALS. DECISION RENDERED 2/ 8/ 96 WHEREIN RESPONDENT IS CENSURED ANDFINED \$10,000; KRULL IS CENSURED, FINED \$50,000,SUSPENDED FROM ASSOCIATION WITH ANY NASD MEMBER IN ANY CAPACITYFOR 90 DAYS, BARRED FROM ASSOCIATION WITH NASD MEMBER IN PRINCIPAL CAPACITY, REQUIRED TO REQUALIFY BYEXAMINATION ANDRESPONDENTS AND KRULL ASSESSED HEARING COSTS FOR \$4,922.50, JOINTLY AND SEVERALLY. DECISION SERVE AS LETTER THAT EVIDENCE IN RECORD DID NOT SUPPORT FINDING THAT RESPONDENTS WERE RESPONSIBLE FOR SUPERVISORY FAILURES. NO FURTHER ACTION, DECISION 8/ 25/ 97. 8/ 25/



97 - DECISION FINAL\$14,922.50 FULLY PAID AS OF 11/24/97, INVOICE #97-3B-798

Reporting Source: Firm

Current Status: Final

Allegations: DBCC ALLEGED VIOLATIONS OF ARTICLE III,SECTIONS 1 & 27 OF THE NASD RULES OF FAIR PRACTICE THAT INVESTMENT MANAGEMENT & RESEARCH, INC. (NOW RAYMOND JAMES FINANCIAL SERVICES, INC.) FAILED TO ENSURE A REGISTERED REPRESENTATIVE'S ACTIVITIES WERE ADEQUATELY REVIEWED AND MONITORED AND FAILED TO HAVE ADEQUATE SUPERVISORY PROCEDURES GOVERNING THE REVIEW AND ENDORSEMENT OF TRANSACTIONS OF ITS REGISTERED REPRESENTATIVES.

Initiated By: NASDR

Date Initiated: 12/21/1994

Docket/Case Number: C3B940028

Principal Product Type: Mutual Fund(s)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought: \$10,000 FINE;ORDER TO REPAY \$42,785.21 IN COMMISSIONS TO CUSTOMERS

Resolution: Decision

Resolution Date: 07/25/1997

Sanctions Ordered: Censure
Monetary/Fine \$10,000.00
Disgorgement/Restitution

Other Sanctions Ordered:

Sanction Details: \$10,000. FINE PAID BY INVESTMENT MANAGEMENT & RESEARCH, INC. (NOW RAYMOND JAMES FINANCIAL SERVICES, INC.) TO NASD ON 09/16/97. \$42,785.21 IN COMMISSIONS PAID BY INVESTMENT MANAGEMENT & RESEARCH, INC. (NOW RAYMOND JAMES FINANCIAL SERVICES, INC.) TO CUSTOMERS ON 09/16/97.

Firm Statement THE NATIONAL BUSINESS CONDUCT COMMITTEE FOUND THAT IM&R'S SUPERVISORY PROCEDURES WERE NOT REASONABLY DESIGNED TO DETECT MUTUAL FUND SWITCHING IN AN INDIVIDUAL BRANCH OFFICE.



THE FIRM WAS CENSURED, FINED, AND ORDERED TO REPAY COMMISSIONS.

Disclosure 128 of 128

Reporting Source:	Regulator
Current Status:	Final
Allegations:	IN THE ADMINISTRATIVE COMPLAINT DATED JANUARY 28, 1994, THE MASSACHUSETTS SECURITIES DIVISION (MSD) ALLEGED THAT CYPRESS EQUIPMENT FUND, RAYMOND JAMES & ASSOCIATES, INVESTMENT MANAGEMENT & RESEARCH, ROBERT THOMAS SECURITIES, WILLIAM HAAS AND STEPHEN COOK SOLD UNREGISTERED NON-EXEMPT SECURITIES OF THE FUND IN VIOLATION OF M.G.L. c.110A SECTION 301. THE MSD ALSO ALLEGED THAT RESPONDENTS VIOLATED M.G.L. c.110A SECTION 101 BY FAILING TO DISCLOSE THE SECURITIES' LACK OF REGISTRATION, THAT RESPONDENTS ENGAGED IN DISHONEST AND UNETHICAL PRACTICES, AND THAT RJA, IM&R AND ROBERT THOMAS FAILED TO REASONABLY SUPERVISE THEIR AGENTS.
Initiated By:	MASSACHUSETTS SECURITIES DIVISION
Date Initiated:	01/28/1994
Docket/Case Number:	92-007-E
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:	11/22/1994
Sanctions Ordered:	Monetary/Fine \$5,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	
Sanction Details:	ON NOVEMBER 22, 1994 RESPONDENTS ENTERED INTO A CONSENT ORDER WITHOUT ADMITTING OR DENYING FINDINGS OF FACTS OR CONCLUSIONS OF LAW. RESPONDENT UNDERTOOK THE FOLLOWING:



THAT
THEY DISCLOSED ALL OFFER AND SALES OF THE FUND IN THE
COMMONWEALTH; THAT THE FUND, RJA, IM&R AND ROBERT THOMAS
DISCLOSED ALL DISCIPLINARY ACTIONS AGAINST THEM REQUIRED TO BE
DISCLOSED; RJA, IM&R, AND ROBERT THOMAS WILL REVISE THEIR
COMPLAINCE MANUALS TO REQUIRE AGENTS WHO TRANSACT BUSINESS
IN
SECURITIES IN THE COMMONWELATH TO COMPLY WITH THE ACT; THE
FUND
WILL OFFER RESCISSION TO ALL MASSACHUSETTS INVESTORS IN THE
FUND; THE FUND, RJA, IM&R AND ROBERT THOMAS WILL IMPLEMENT AND
MAINTAIN PROCEDURES DESIGNED TO ENSURE COMPLIANCE WITH THE
ACT;
THE FUND, RJA, IM&R AND ROBERT THOMAS WILL COMPLY WITH ALL
PROVISION OF THE ACT. THE ORDER IMPOSED SANCTIONS OF A \$5,000
FINE EACH UPON BY THE FUND, RJA, IM&R AND ROBERT THOMAS;
DISGORGEMENT OF COMMISSIONS BY THE FUND, RJA, IM&R AND ROBERT
THOMAS; AND A BAR UPON THE FUND FROM UTILIZING EXEMPTION
SECTION 402 (b)(9) FOR FIVE YEARS. NO SANCTIONS WERE IMPOSED
UPON HAAS OR COOK.

Regulator Statement	Not Provided
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Reporting Source:	Firm
Current Status:	Final
Allegations:	COMPLIANT ALLEGED THAT RESPONDENTS SOLD SECURITIES OF CYPRESS EQUIPMENT FUND NOT REGISTERED OR EXEMPT FROM REGISTRATION WITHIN THE COMMONWEALTH IN VIOLATION OF M.G.L.301 AFTER WITHDRAWING THE SECURITIES FROM THE REGISTRATION PROCESS.
Initiated By:	COMMONWEALTH OF MA, ENFORCEMENT SECTION OF THE SECURITIES DIV.
Date Initiated:	01/28/1994
Docket/Case Number:	92-007-E
Principal Product Type:	Investment Contract(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Disgorgement
Other Sanction(s)/Relief Sought:	



Resolution:	Settled
Resolution Date:	11/24/1994
Sanctions Ordered:	Monetary/Fine \$5,000.00
Other Sanctions Ordered:	
Sanction Details:	EACH BROKER/DEALER PAID A FINE OF \$5,000 TO THE COMMONWEALTH AND DISGORGED ALL COMMISSIONS OBTAINED AS THE RESULT OF THE SALE.
Firm Statement	WITHOUT ADMITTING OR DENYING LIABILITY, AGREED TO OFFER A RESCISSION TO THE THREE CUSTOMERS.



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 76

Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-NEGLIGENCE; ACCOUNT RELATED-OTHER
Arbitration Forum:	NASD
Case Initiated:	10/03/2000
Case Number:	00-04103
Disputed Product Type:	NO OTHER TYPE OF SEC INVOLVE; OTHER TYPES OF SECURITIES
Sum of All Relief Requested:	\$473,000.01
Disposition:	AWARD AGAINST PARTY
Disposition Date:	01/10/2002
Sum of All Relief Awarded:	\$250,000.00

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 76

Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-CHURNING; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT ACTIVITY-UNAUTHORIZED TRADING
Arbitration Forum:	NASD
Case Initiated:	01/17/2001
Case Number:	00-05682



Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE

Sum of All Relief Requested: \$901,807.38

Disposition: AWARD AGAINST PARTY

Disposition Date: 08/05/2002

Sum of All Relief Awarded: \$400,619.31

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

Disclosure 3 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE

Arbitration Forum: NASD

Case Initiated: 03/09/2001

Case Number: [01-00324](#)

Disputed Product Type: NO OTHER TYPE OF SEC INVOLVE; LIMITED PARTNERSHIPS

Sum of All Relief Requested: \$30,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 04/05/2002

Sum of All Relief Awarded: \$20,000.00

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

Disclosure 4 of 76

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-MARGIN CALLS

Arbitration Forum: NASD



Case Initiated: 04/12/2001
Case Number: [01-01668](#)
Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE
Sum of All Relief Requested: \$343,850.00
Disposition: AWARD AGAINST PARTY
Disposition Date: 05/02/2002
Sum of All Relief Awarded: \$79,650.00

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

Disclosure 5 of 76

Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE; NO OTHER CONTROVERSY INVOLVED
Arbitration Forum: NASD
Case Initiated: 12/31/2001
Case Number: [01-03776](#)
Disputed Product Type: NO OTHER TYPE OF SEC INVOLVE; UNKNOWN TYPE OF SECURITIES
Sum of All Relief Requested: \$100,000.00
Disposition: AWARD AGAINST PARTY
Disposition Date: 11/18/2002
Sum of All Relief Awarded: \$17,500.00

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

Disclosure 6 of 76

Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-CHURNING; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-UNAUTHORIZED TRADING



Arbitration Forum: NASD
Case Initiated: 10/02/2001
Case Number: [01-04334](#)
Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE; MUTUAL FUNDS; OPTIONS
Sum of All Relief Requested: \$341,310.18
Disposition: AWARD AGAINST PARTY
Disposition Date: 11/15/2002
Sum of All Relief Awarded: \$47,336.63

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

Disclosure 7 of 76

Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-NEGLIGENCE
Arbitration Forum: NASD
Case Initiated: 09/06/2001
Case Number: [01-04715](#)
Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE; OTHER TYPES OF SECURITIES
Sum of All Relief Requested: \$59,540.93
Disposition: AWARD AGAINST PARTY
Disposition Date: 07/29/2002
Sum of All Relief Awarded: \$43,000.00

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

Disclosure 8 of 76

Reporting Source: Regulator



Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-NEGLIGENCE

Arbitration Forum: NASD

Case Initiated: 12/13/2001

Case Number: [01-06680](#)

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

Sum of All Relief Requested: \$171,710.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 10/02/2003

Sum of All Relief Awarded: \$90,000.00

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

Disclosure 9 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-FAILURE TO SUPERVISE; NO OTHER CONTROVERSY INVOLVED

Arbitration Forum: NASD

Case Initiated: 02/21/2002

Case Number: [02-00914](#)

Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE

Sum of All Relief Requested: \$200,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 03/13/2003

Sum of All Relief Awarded: \$188,553.00

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

**Disclosure 10 of 76**

Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-CHURNING; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-UNAUTHORIZED TRADING
Arbitration Forum:	NASD
Case Initiated:	04/29/2002
Case Number:	02-01960
Disputed Product Type:	COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE; MUTUAL FUNDS; OPTIONS
Sum of All Relief Requested:	\$999,000.00
Disposition:	AWARD AGAINST PARTY
Disposition Date:	07/29/2003
Sum of All Relief Awarded:	\$30,875.00

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

Disclosure 11 of 76

Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT RELATED-ERRORS-CHARGES; ACCOUNT RELATED-FAILURE TO SUPERVISE
Arbitration Forum:	NASD
Case Initiated:	05/22/2002
Case Number:	02-02769
Disputed Product Type:	ANNUITIES; COMMON STOCK; MUTUAL FUNDS; OPTIONS
Sum of All Relief Requested:	\$100,000.00
Disposition:	AWARD AGAINST PARTY
Disposition Date:	06/16/2003



Sum of All Relief Awarded: \$0.00

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

Disclosure 12 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE; ACCOUNT RELATED-TRANSFER

Arbitration Forum: NASD

Case Initiated: 05/28/2002

Case Number: [02-02993](#)

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

Sum of All Relief Requested: \$715,802.44

Disposition: AWARD AGAINST PARTY

Disposition Date: 05/04/2004

Sum of All Relief Awarded: \$70,893.01

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

Disclosure 13 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-OTHER; ACCOUNT RELATED-NEGLIGENCE

Arbitration Forum: NASD

Case Initiated: 11/27/2002

Case Number: [02-06239](#)

Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE

Sum of All Relief Requested: \$800,000.00



Disposition: AWARD AGAINST PARTY

Disposition Date: 05/09/2005

Sum of All Relief Awarded: \$166,929.65

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

Disclosure 14 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT ACTIVITY-UNAUTHORIZED TRADING; ACCOUNT RELATED-NEGLIGENCE

Arbitration Forum: NASD

Case Initiated: 11/13/2002

Case Number: [02-06300](#)

Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE

Sum of All Relief Requested: \$26,655.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 03/25/2003

Sum of All Relief Awarded: \$6,212.50

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

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Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE

Arbitration Forum: NASD

Case Initiated: 11/05/2002

Case Number: [02-06507](#)



Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE

Sum of All Relief Requested: \$329,018.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 03/02/2004

Sum of All Relief Awarded: \$71,277.36

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

Disclosure 16 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-FAILURE TO SUPERVISE

Arbitration Forum: NASD

Case Initiated: 11/12/2002

Case Number: [02-06665](#)

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

Sum of All Relief Requested: \$642,373.81

Disposition: AWARD AGAINST PARTY

Disposition Date: 03/26/2004

Sum of All Relief Awarded: \$72,875.01

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

Disclosure 17 of 76

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: 02/26/2003
Case Number: [03-01219](#)
Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE; MUTUAL FUNDS
Sum of All Relief Requested: \$110,000.00
Disposition: AWARD AGAINST PARTY
Disposition Date: 04/26/2005
Sum of All Relief Awarded: \$44,000.01

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

Disclosure 18 of 76

Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: ACCOUNT ACTIVITY-OTHER; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE
Arbitration Forum: NASD
Case Initiated: 04/30/2003
Case Number: [03-02176](#)
Disputed Product Type: NO OTHER TYPE OF SEC INVOLVE; MUTUAL FUNDS
Sum of All Relief Requested: \$339,000.00
Disposition: AWARD AGAINST PARTY
Disposition Date: 07/27/2004
Sum of All Relief Awarded: \$80,000.00

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

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Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT RELATED-BREACH OF CONTRACT



Arbitration Forum: NASD
Case Initiated: 04/04/2003
Case Number: [03-02306](#)
Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE; MUTUAL FUNDS
Sum of All Relief Requested: \$1,713,214.00
Disposition: AWARD AGAINST PARTY
Disposition Date: 01/11/2005
Sum of All Relief Awarded: \$9,999.00

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

Disclosure 20 of 76

Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: NO OTHER CONTROVERSY INVOLVED; UNKNOWN TYPE OF CONTROVERSIES
Arbitration Forum: NASD
Case Initiated: 07/18/2003
Case Number: [03-04051](#)
Disputed Product Type: NO OTHER TYPE OF SEC INVOLVE; UNKNOWN TYPE OF SECURITIES
Sum of All Relief Requested: \$16,000,000.00
Disposition: AWARD AGAINST PARTY
Disposition Date: 10/29/2004
Sum of All Relief Awarded: \$10,600.00

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

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Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-



CHURNING; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT
ACTIVITY-OMISSION OF FACTS

Arbitration Forum: NASD

Case Initiated: 06/16/2003

Case Number: [03-04149](#)

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

Sum of All Relief Requested: \$100,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 04/30/2004

Sum of All Relief Awarded: \$7,255.00

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

Disclosure 22 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-
CHURNING; ACCOUNT ACTIVITY-UNAUTHORIZED TRADING; ACCOUNT
RELATED-FAILURE TO SUPERVISE

Arbitration Forum: NASD

Case Initiated: 06/17/2003

Case Number: [03-04284](#)

Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE

Sum of All Relief Requested: \$1,020,040.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 05/21/2004

Sum of All Relief Awarded: \$510,500.00

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

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Reporting Source: Regulator



Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-BREACH OF CONTRACT

Arbitration Forum: NASD

Case Initiated: 07/16/2003

Case Number: [03-05109](#)

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

Sum of All Relief Requested: \$500,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 08/31/2005

Sum of All Relief Awarded: \$0.00

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

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Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT ACTIVITY-UNAUTHORIZED TRADING; ACCOUNT RELATED-NEGLIGENCE

Arbitration Forum: NASD

Case Initiated: 08/21/2003

Case Number: [03-05945](#)

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

Sum of All Relief Requested: \$250,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 11/24/2004

Sum of All Relief Awarded: \$57,636.00

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



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Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE
Arbitration Forum:	NASD
Case Initiated:	12/03/2003
Case Number:	03-07711
Disputed Product Type:	NO OTHER TYPE OF SEC INVOLVE; UNKNOWN TYPE OF SECURITIES
Sum of All Relief Requested:	\$525,000.00
Disposition:	AWARD AGAINST PARTY
Disposition Date:	09/09/2005
Sum of All Relief Awarded:	\$367,985.36

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

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Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-ERRORS-CHARGES; ACCOUNT RELATED-FAILURE TO SUPERVISE
Arbitration Forum:	NASD
Case Initiated:	11/25/2003
Case Number:	03-08282
Disputed Product Type:	CORPORATE BONDS; NO OTHER TYPE OF SEC INVOLVE; MUTUAL FUNDS
Sum of All Relief Requested:	\$400,000.00
Disposition:	AWARD AGAINST PARTY
Disposition Date:	01/24/2006



Sum of All Relief Awarded: \$0.00

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

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Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY

Arbitration Forum: NASD

Case Initiated: 12/17/2003

Case Number: [03-08764](#)

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

Sum of All Relief Requested: \$1,000,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 03/21/2005

Sum of All Relief Awarded: \$437,058.52

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

Disclosure 28 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY

Arbitration Forum: NASD

Case Initiated: 12/22/2003

Case Number: [03-08927](#)

Disputed Product Type: ANNUITIES; COMMON STOCK; CORPORATE BONDS; MUTUAL FUNDS

Sum of All Relief Requested: \$499,000.00



Disposition: AWARD AGAINST PARTY

Disposition Date: 04/21/2005

Sum of All Relief Awarded: \$23,400.00

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

Disclosure 29 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-UNAUTHORIZED TRADING

Arbitration Forum: NASD

Case Initiated: 12/23/2003

Case Number: [03-08972](#)

Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE

Sum of All Relief Requested: \$100,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 12/02/2004

Sum of All Relief Awarded: \$20,000.00

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

Disclosure 30 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-OTHER

Arbitration Forum: NASD

Case Initiated: 02/02/2004

Case Number: [04-00511](#)



Disputed Product Type: ANNUITIES; NO OTHER TYPE OF SEC INVOLVE; MUTUAL FUNDS

Sum of All Relief Requested: \$602,886.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 09/27/2005

Sum of All Relief Awarded: \$499,417.57

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

Disclosure 31 of 76

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: 03/09/2004

Case Number: [04-01133](#)

Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE

Sum of All Relief Requested: \$303,548.28

Disposition: AWARD AGAINST PARTY

Disposition Date: 04/19/2005

Sum of All Relief Awarded: \$52,127.87

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

Disclosure 32 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE

Arbitration Forum: NASD



Case Initiated: 03/30/2004
Case Number: [04-02059](#)
Disputed Product Type: NO OTHER TYPE OF SEC INVOLVE; UNKNOWN TYPE OF SECURITIES
Sum of All Relief Requested: \$1,800,000.00
Disposition: AWARD AGAINST PARTY
Disposition Date: 05/03/2006
Sum of All Relief Awarded: \$340,920.44

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

Disclosure 33 of 76

Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY
Arbitration Forum: NASD
Case Initiated: 06/09/2004
Case Number: [04-03717](#)
Disputed Product Type: NO OTHER TYPE OF SEC INVOLVE; MUTUAL FUNDS
Sum of All Relief Requested: Unspecified Damages
Disposition: AWARD AGAINST PARTY
Disposition Date: 09/30/2005
Sum of All Relief Awarded: \$240,000.00

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

Disclosure 34 of 76

Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY; NO OTHER



CONTROVERSY INVOLVED

Arbitration Forum: NASD

Case Initiated: 07/09/2004

Case Number: [04-04830](#)

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

Sum of All Relief Requested: Unspecified Damages

Disposition: AWARD AGAINST PARTY

Disposition Date: 07/18/2005

Sum of All Relief Awarded: \$148,136.44

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

Disclosure 35 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE

Arbitration Forum: NASD

Case Initiated: 08/11/2004

Case Number: [04-05628](#)

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

Sum of All Relief Requested: \$516,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 12/01/2005

Sum of All Relief Awarded: \$78,000.00

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

Disclosure 36 of 76

Reporting Source: Regulator



Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE

Arbitration Forum: NASD

Case Initiated: 12/14/2004

Case Number: [04-08383](#)

Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE; MUTUAL FUNDS

Sum of All Relief Requested: \$143,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 10/19/2005

Sum of All Relief Awarded: \$156,080.77

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

Disclosure 37 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE

Arbitration Forum: NASD

Case Initiated: 03/22/2005

Case Number: [05-01437](#)

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

Sum of All Relief Requested: \$2,200,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 04/21/2006

Sum of All Relief Awarded: \$200,000.00

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



Disclosure 38 of 76

Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT RELATED-NEGLIGENCE
Arbitration Forum:	NASD
Case Initiated:	04/08/2005
Case Number:	05-01668
Disputed Product Type:	NO OTHER TYPE OF SEC INVOLVE; UNKNOWN TYPE OF SECURITIES
Sum of All Relief Requested:	\$3,000,000.00
Disposition:	AWARD AGAINST PARTY
Disposition Date:	10/26/2006
Sum of All Relief Awarded:	\$469,917.95

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

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Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE
Arbitration Forum:	NASD
Case Initiated:	07/21/2005
Case Number:	05-02058
Disputed Product Type:	NO OTHER TYPE OF SEC INVOLVE; UNKNOWN TYPE OF SECURITIES
Sum of All Relief Requested:	Unspecified Damages
Disposition:	AWARD AGAINST PARTY
Disposition Date:	10/12/2006



Sum of All Relief Awarded: \$260,548.09

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

Disclosure 40 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT RELATED-BREACH OF CONTRACT; NO OTHER CONTROVERSY INVOLVED

Arbitration Forum: NASD

Case Initiated: 05/09/2005

Case Number: [05-02363](#)

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

Sum of All Relief Requested: \$123,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 04/27/2006

Sum of All Relief Awarded: \$77,000.00

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

Disclosure 41 of 76

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: 05/23/2005

Case Number: [05-02671](#)

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

Sum of All Relief Requested: \$145,000.00



Disposition: AWARD AGAINST PARTY

Disposition Date: 05/02/2006

Sum of All Relief Awarded: \$126,748.61

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

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Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-NEGLIGENCE

Arbitration Forum: NASD

Case Initiated: 06/02/2005

Case Number: [05-02845](#)

Disputed Product Type: ANNUITIES; NO OTHER TYPE OF SEC INVOLVE

Sum of All Relief Requested: \$431,533.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 04/12/2006

Sum of All Relief Awarded: \$417,359.01

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

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Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-BREACH OF CONTRACT

Arbitration Forum: NASD

Case Initiated: 06/15/2005

Case Number: [05-03030](#)



Disputed Product Type: ANNUITIES; NO OTHER TYPE OF SEC INVOLVE

Sum of All Relief Requested: \$2,000,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 10/26/2006

Sum of All Relief Awarded: \$728,280.12

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

Disclosure 44 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-NEGLIGENCE; NO OTHER CONTROVERSY INVOLVED

Arbitration Forum: NASD

Case Initiated: 01/30/2006

Case Number: [06-00236](#)

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

Sum of All Relief Requested: \$200,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 04/02/2007

Sum of All Relief Awarded: \$225,000.00

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

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Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-BREACH OF CONTRACT

Arbitration Forum: NASD



Case Initiated: 09/07/2006
Case Number: [06-04035](#)
Disputed Product Type: ANNUITIES; GOVERNMENT SECURITIES; MUTUAL FUNDS; OTHER TYPES OF SECURITIES
Sum of All Relief Requested: \$27,992.00
Disposition: AWARD AGAINST PARTY
Disposition Date: 06/15/2007
Sum of All Relief Awarded: \$21,879.51

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

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Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE
Arbitration Forum: NASD
Case Initiated: 11/06/2006
Case Number: [06-04074](#)
Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE
Sum of All Relief Requested: \$640,000.00
Disposition: AWARD AGAINST PARTY
Disposition Date: 03/28/2008
Sum of All Relief Awarded: \$225,375.00

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

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Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: ACCOUNT ACTIVITY-UNAUTHORIZED TRADING; NO OTHER CONTROVERSY



INVOLVED

Arbitration Forum: NASD

Case Initiated: 10/10/2006

Case Number: [06-04161](#)

Disputed Product Type: NO OTHER TYPE OF SEC INVOLVE

Sum of All Relief Requested: \$150,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 11/15/2007

Sum of All Relief Awarded: \$8,300.00

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

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Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-NEGLIGENCE

Arbitration Forum: NASD

Case Initiated: 05/15/2007

Case Number: [07-01361](#)

Disputed Product Type: ANNUITIES; NO OTHER TYPE OF SEC INVOLVE

Sum of All Relief Requested: Unspecified Damages

Disposition: AWARD AGAINST PARTY

Disposition Date: 04/15/2008

Sum of All Relief Awarded: \$36,916.79

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

Disclosure 49 of 76

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: 06/14/2007

Case Number: [07-01783](#)

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

Sum of All Relief Requested: \$3,156,145.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 10/06/2008

Sum of All Relief Awarded: \$145,300.00

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

Disclosure 50 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-CHURNING; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE; ACCOUNT RELATED-OTHER; EXECUTIONS-FAILURE TO EXECUTE

Arbitration Forum: FINRA

Case Initiated: 09/03/2009

Case Number: [09-03354](#)

Disputed Product Type: AUCTION RATE SECURITIES

Sum of All Relief Requested: \$2,466,635.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 07/22/2010

Sum of All Relief Awarded: \$33,120.01



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

Disclosure 51 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE; ACCOUNT RELATED-OTHER

Arbitration Forum: FINRA

Case Initiated: 07/13/2009

Case Number: [09-03475](#)

Disputed Product Type: AUCTION RATE SECURITIES

Sum of All Relief Requested: \$12,000,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 07/19/2010

Sum of All Relief Awarded: \$0.00

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

Disclosure 52 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-UNAUTHORIZED TRADING; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-NEGLIGENCE

Arbitration Forum: FINRA

Case Initiated: 07/14/2009

Case Number: [09-03951](#)

Disputed Product Type: CERTIFICATE OF DEPOSIT; MUNICIPAL BONDS; MUTUAL FUNDS

Sum of All Relief Requested: \$480,129.27



Disposition: AWARD AGAINST PARTY

Disposition Date: 08/27/2010

Sum of All Relief Awarded: \$22,999.17

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

Disclosure 53 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY

Arbitration Forum: FINRA

Case Initiated: 09/17/2009

Case Number: [09-04932](#)

Disputed Product Type: AUCTION RATE SECURITIES

Sum of All Relief Requested: \$5,400,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 11/10/2010

Sum of All Relief Awarded: \$0.00

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

Disclosure 54 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT RELATED-ERRORS-CHARGES

Arbitration Forum: FINRA

Case Initiated: 12/24/2009

Case Number: [09-06746](#)

Disputed Product Type: COMMON STOCK; OPTIONS



Sum of All Relief Requested: \$26,006.03

Disposition: AWARD AGAINST PARTY

Disposition Date: 07/28/2010

Sum of All Relief Awarded: \$556.03

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

Disclosure 55 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-CHURNING; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY

Arbitration Forum: FINRA

Case Initiated: 05/14/2010

Case Number: [10-01601](#)

Disputed Product Type: COMMON STOCK; MUTUAL FUNDS; PRIVATE EQUITIES

Sum of All Relief Requested: \$210,834.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 02/03/2012

Sum of All Relief Awarded: \$15,300.00

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

Disclosure 56 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-MANIPULATION; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-NEGLIGENCE

Arbitration Forum: FINRA

Case Initiated: 05/26/2010



Case Number: [10-02162](#)

Disputed Product Type: OTHER TYPES OF SECURITIES; VARIABLE ANNUITIES

Sum of All Relief Requested: \$2,379,634.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 05/10/2011

Sum of All Relief Awarded: \$1,497,065.00

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

Disclosure 57 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-OTHER; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE

Arbitration Forum: FINRA

Case Initiated: 10/27/2010

Case Number: [10-04291](#)

Disputed Product Type: ANNUITIES; MUTUAL FUNDS

Sum of All Relief Requested: Unspecified Damages

Disposition: AWARD AGAINST PARTY

Disposition Date: 10/04/2012

Sum of All Relief Awarded: \$265,000.01

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

Disclosure 58 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-



MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS;
ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-BREACH OF
CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT
RELATED-NEGLIGENCE; ACCOUNT RELATED-OTHER

Arbitration Forum: FINRA
Case Initiated: 11/30/2010
Case Number: [10-04885](#)
Disputed Product Type: AUCTION RATE SECURITIES
Sum of All Relief Requested: \$1,554,611.10
Disposition: AWARD AGAINST PARTY
Disposition Date: 05/24/2012
Sum of All Relief Awarded: \$518,203.70

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

Disclosure 59 of 76

Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MANIPULATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-FAILURE TO SUPERVISE
Arbitration Forum: FINRA
Case Initiated: 07/16/2012
Case Number: [12-01905](#)
Disputed Product Type: HEDGE FUND
Sum of All Relief Requested: \$232,101.84
Disposition: AWARD AGAINST PARTY
Disposition Date: 07/22/2013
Sum of All Relief Awarded: \$132,095.00

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



Disclosure 60 of 76

Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-CHURNING; ACCOUNT ACTIVITY-OTHER; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE
Arbitration Forum:	FINRA
Case Initiated:	02/07/2013
Case Number:	13-00325
Disputed Product Type:	
Sum of All Relief Requested:	\$29,374,472.69
Disposition:	AWARD AGAINST PARTY
Disposition Date:	02/16/2016
Sum of All Relief Awarded:	\$593,540.01

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

Disclosure 61 of 76

Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-CHURNING; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE
Arbitration Forum:	FINRA
Case Initiated:	07/24/2013
Case Number:	13-02097
Disputed Product Type:	COMMON STOCK
Sum of All Relief Requested:	\$50,000.00
Disposition:	AWARD AGAINST PARTY
Disposition Date:	03/13/2014
Sum of All Relief Awarded:	\$13,750.01



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

Disclosure 62 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-CHURNING; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-FAILURE TO SUPERVISE

Arbitration Forum: FINRA

Case Initiated: 10/11/2013

Case Number: [13-02837](#)

Disputed Product Type: COMMON STOCK; VARIABLE ANNUITIES

Sum of All Relief Requested: \$1,679,504.38

Disposition: AWARD AGAINST PARTY

Disposition Date: 03/17/2015

Sum of All Relief Awarded: \$165,148.00

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

Disclosure 63 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-CHURNING; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT ACTIVITY-UNAUTHORIZED TRADING; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE

Arbitration Forum: FINRA

Case Initiated: 11/20/2014

Case Number: [14-02745](#)



Disputed Product Type: ANNUITIES; UNIT INVESTMENT TRUST

Sum of All Relief Requested: \$4,617,724.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 10/15/2015

Sum of All Relief Awarded: \$100,000.00

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

Disclosure 64 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY

Arbitration Forum: FINRA

Case Initiated: 07/15/2016

Case Number: [16-01727](#)

Disputed Product Type: VARIABLE ANNUITIES

Sum of All Relief Requested: \$50,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 11/29/2016

Sum of All Relief Awarded: \$20,743.09

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

Disclosure 65 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-OTHER; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-FAILURE TO SUPERVISE

Arbitration Forum: FINRA



Case Initiated: 10/05/2016
Case Number: [16-02915](#)
Disputed Product Type: COMMON STOCK; LIMITED PARTNERSHIPS; MUTUAL FUNDS
Sum of All Relief Requested: \$51,116.00
Disposition: AWARD AGAINST PARTY
Disposition Date: 03/07/2017
Sum of All Relief Awarded: \$29,884.01

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

Disclosure 66 of 76

Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE
Arbitration Forum: FINRA
Case Initiated: 09/06/2019
Case Number: [19-02688](#)
Disputed Product Type: COMMON STOCK
Sum of All Relief Requested: \$4,000,000.00
Disposition: AWARD AGAINST PARTY
Disposition Date: 08/12/2021
Sum of All Relief Awarded: \$165,000.00

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

Disclosure 67 of 76

Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-CHURNING; ACCOUNT ACTIVITY-FRAUD; ACCOUNT ACTIVITY-



MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS;
ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT ACTIVITY-UNAUTHORIZED
TRADING; ACCOUNT ACTIVITY-VIOLATE OF BLUE SKY LWS; ACCOUNT
RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO
SUPERVISE; ACCOUNT RELATED-MARGIN CALLS; ACCOUNT RELATED-
NEGLIGENCE

Arbitration Forum: FINRA

Case Initiated: 01/14/2020

Case Number: [20-00107](#)

Disputed Product Type: COMMON STOCK; CORPORATE BONDS; EXCHANGE-TRADED FUNDS;
GOVERNMENT SECURITIES; LIMITED PARTNERSHIPS; MUNICIPAL BONDS;
MUTUAL FUNDS; OPTIONS; OTHER TYPES OF SECURITIES; PRIVATE
EQUITIES

Sum of All Relief Requested: Unspecified Damages

Disposition: AWARD AGAINST PARTY

Disposition Date: 08/29/2022

Sum of All Relief Awarded: \$67,917.01

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

Disclosure 68 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT RELATED-
NEGLIGENCE; NO OTHER CONTROVERSY INVOLVED

Arbitration Forum: NASD

Case Initiated: 09/06/1991

Case Number: [91-02646](#)

Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE

Sum of All Relief Requested: \$45,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 03/26/1993

Sum of All Relief Awarded: \$8,500.00



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

Disclosure 69 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-CHURNING; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-SUITABILITY

Arbitration Forum: NASD

Case Initiated: 11/05/1991

Case Number: [91-03261](#)

Disputed Product Type: COMMON STOCK; LIMITED PARTNERSHIPS; MUTUAL FUNDS; OPTIONS

Sum of All Relief Requested: \$1,376,653.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 06/16/1993

Sum of All Relief Awarded: \$219,329.00

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

Disclosure 70 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY

Arbitration Forum: NASD

Case Initiated: 08/15/1995

Case Number: [95-03706](#)

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

Sum of All Relief Requested: \$270,065.00

Disposition: AWARD AGAINST PARTY



Disposition Date: 08/06/1996

Sum of All Relief Awarded: \$60,000.00

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

Disclosure 71 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY

Arbitration Forum: NASD

Case Initiated: 08/03/1995

Case Number: [95-03735](#)

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

Sum of All Relief Requested: \$579,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 05/21/1997

Sum of All Relief Awarded: \$125,000.00

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

Disclosure 72 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-FAILURE TO SUPERVISE

Arbitration Forum: NASD

Case Initiated: 11/14/1996

Case Number: [96-01860](#)

Disputed Product Type: NO OTHER TYPE OF SEC INVOLVE; LIMITED PARTNERSHIPS



Sum of All Relief Requested: \$412,314.36

Disposition: AWARD AGAINST PARTY

Disposition Date: 05/28/1999

Sum of All Relief Awarded: \$117,200.00

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

Disclosure 73 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-UNAUTHORIZED TRADING; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE

Arbitration Forum: NASD

Case Initiated: 07/30/1996

Case Number: [96-02817](#)

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

Sum of All Relief Requested: \$1,300,000.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 05/30/1997

Sum of All Relief Awarded: \$40,500.00

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

Disclosure 74 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT RELATED-FAILURE TO SUPERVISE; NO OTHER CONTROVERSY INVOLVED

Arbitration Forum: NASD

Case Initiated: 03/24/1998



Case Number: [98-00167](#)

Disputed Product Type: COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE

Sum of All Relief Requested: \$11,550.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 03/03/1999

Sum of All Relief Awarded: \$3,981.52

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

Disclosure 75 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-FAILURE TO SUPERVISE

Arbitration Forum: NASD

Case Initiated: 06/17/1998

Case Number: [98-01391](#)

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

Sum of All Relief Requested: \$18,100.00

Disposition: AWARD AGAINST PARTY

Disposition Date: 02/02/2000

Sum of All Relief Awarded: \$16,500.00

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

Disclosure 76 of 76

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-ERRORS-CHARGES; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE



Arbitration Forum:	NASD
Case Initiated:	12/17/1999
Case Number:	99-05270
Disputed Product Type:	COMMON STOCK; NO OTHER TYPE OF SEC INVOLVE
Sum of All Relief Requested:	\$426,037.00
Disposition:	AWARD AGAINST PARTY
Disposition Date:	01/23/2002
Sum of All Relief Awarded:	\$9,500.00

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

Disclosure Events for Non-Registered Control Affiliates



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

	Pending	Final	On Appeal
Regulatory Event	0	1	0



Disclosure Event Details

Regulatory - Final

Disclosure 1 of 1

Reporting Source:	Firm
Affiliate:	RAYMOND JAMES YATIRIM MENKUL KIYMETLER, A. S.
Current Status:	Final
Allegations:	THE CAPITAL MARKETS BOARD OF TURKEY SUSPENDED THE LICENSE OF OUR AFFILIATED JOINT VENTURE IN TURKEY, RAYMOND JAMES YATIRIM MENKUL KIYMETLER A.S., FOR FAILING TO MAINTAIN ITS NET CAPITAL RATIO, RESULTING IN A TECHNICAL CAPITAL INADEQUACY.
Initiated By:	CAPITAL MARKETS BOARD (CMB)
Date Initiated:	10/24/2008
Docket/Case Number:	UNKNOWN
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Suspension
Other Sanction(s)/Relief Sought:	
Resolution:	Decision
Resolution Date:	10/24/2008
Sanctions Ordered:	Suspension
Other Sanctions Ordered:	
Sanction Details:	ON OCTOBER 24, 2008, THE CAPITAL MARKETS BOARD (CMB) SUSPENDED THE LICENSE OF OUR TURKISH AFFILIATE, RAYMOND JAMES YATIRIM MENKUL KIYMETLER A.S. UNTIL A CAPITAL ADEQUACY RATION HAS BEEN REACHED.
Firm Statement	RAYMOND JAMES SECURITIES TURKEY (RJST) HAS SUSPENDED OPERATIONS PENDING RESOLUTION.

End of Report



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