

BrokerCheck Report

JAMES EDWARD BASHAW

CRD# 1251491

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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:

- o 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
- o 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.



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

Thank you for using FINRA BrokerCheck.

**JAMES E. BASHAW**

CRD# 1251491

Currently employed by and registered with the following Firm(s):**INTERNATIONAL ASSETS ADVISORY, LLC**

390 North ORANGE AVE.

SUITE 750

ORLANDO, FL 32801

CRD# 10645

Registered with this firm since: 10/29/2014

INTERNATIONAL ASSETS ADVISORY, LLC

5200 SAN FELIPE

HOUSTON, TX 77056

CRD# 10645

Registered with this firm since: 10/29/2014

Report Summary for this Broker

This report summary provides an overview of the broker's professional background and conduct. Additional information can be found in the detailed report.

Broker Qualifications**This broker is registered with:**

- 1 Self-Regulatory Organization
- 4 U.S. states and territories

This broker has passed:

- 2 Principal/Supervisory Exams
- 3 General Industry/Product Exams
- 2 State Securities Law Exams

Registration History**This broker was previously registered with the following securities firm(s):****WUNDERLICH SECURITIES, INC.**

CRD# 2543

HOUSTON, TX

09/2014 - 10/2014

LPL FINANCIAL LLC

CRD# 6413

HOUSTON, TX

11/2001 - 10/2014

UBS PAINWEBBER INC.

CRD# 8174

WEEHAWKEN, NJ

08/2000 - 11/2001

Disclosure Events

All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

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

The following types of disclosures have been reported:

Type	Count
Investigation	1
Customer Dispute	3
Termination	1
Financial	1
Judgment/Lien	1

Investment Adviser Representative Information

The information below represents the individual's record as a broker. For details on this individual's record as an investment adviser representative, visit the SEC's Investment Adviser Public Disclosure website at

<https://www.adviserinfo.sec.gov>



Broker Qualifications

Registrations

This section provides the self-regulatory organizations (SROs) and U.S. states/territories the broker is currently registered and licensed with, the category of each license, and the date on which it became effective. This section also provides, for every brokerage firm with which the broker is currently employed, the address of each branch where the broker works.

This individual is currently registered with 1 SRO and is licensed in 4 U.S. states and territories through his or her employer.

Employment 1 of 1

Firm Name: **INTERNATIONAL ASSETS ADVISORY, LLC**

Main Office Address: **390 NORTH ORANGE AVENUE
STE 750
ORLANDO, FL 32801**

Firm CRD#: **10645**

SRO	Category	Status	Date
FINRA	General Securities Representative	APPROVED	10/29/2014
FINRA	General Securities Sales Supervisor	APPROVED	10/29/2014
FINRA	Municipal Securities Principal	APPROVED	10/29/2014
FINRA	Municipal Securities Representative	APPROVED	10/29/2014

U.S. State/ Territory	Category	Status	Date
Georgia	Agent	APPROVED	06/30/2015
Maryland	Agent	APPROVED	10/29/2014
Pennsylvania	Agent	APPROVED	04/03/2015
Texas	Agent	APPROVED	04/01/2015

Branch Office Locations

INTERNATIONAL ASSETS ADVISORY, LLC
5200 SAN FELIPE
HOUSTON, TX 77056



Broker Qualifications

Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below.

This individual has passed 2 principal/supervisory exams, 3 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
Municipal Securities Principal Examination	Series 53	03/13/2006
General Securities Sales Supervisor Examination (Options Module & General Module)	Series 8	05/30/1997

General Industry/Product Exams

Exam	Category	Date
Securities Industry Essentials Examination	SIE	10/01/2018
National Commodity Futures Examination	Series 3	02/07/2001
General Securities Representative Examination	Series 7	06/16/1984

State Securities Law Exams

Exam	Category	Date
Uniform Investment Adviser Law Examination	Series 65	05/12/1997
Uniform Securities Agent State Law Examination	Series 63	06/26/1984

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at www.finra.org/brokerqualifications/registeredrep/.



Registration and Employment History

Registration History

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
09/2014 - 10/2014	WUNDERLICH SECURITIES, INC.	2543	HOUSTON, TX
11/2001 - 10/2014	LPL FINANCIAL LLC	6413	HOUSTON, TX
08/2000 - 11/2001	UBS PAINWEBBER INC.	8174	WEEHAWKEN, NJ
04/1998 - 08/2000	J.C. BRADFORD & CO.	1287	NEW YORK, NY
04/1994 - 04/1998	SUNTRUST EQUITABLE SECURITIES	6271	ATLANTA, GA
08/1991 - 04/1994	AUGUSTA SECURITIES CORP.	23669	HOUSTON, TX
03/1990 - 09/1991	FIRST AMERICA EQUITIES CORP.	7652	
01/1991 - 07/1991	THOMAS F. WHITE & CO., INCORPORATED	7661	SAN FRANCISCO, CA
10/1986 - 06/1988	KIDDER, PEABODY & CO. INCORPORATED	7613	
06/1984 - 10/1986	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	7691	

Employment History

This section provides up to 10 years of an individual broker's employment history as reported by the individual broker on the most recently filed Form U4.

Please note that the broker is required to provide this information only while registered with FINRA or a national securities exchange and the information is not updated via Form U4 after the broker ceases to be registered. Therefore, an employment end date of "Present" may not reflect the broker's current employment status.

Employment Dates	Employer Name	Employer Location
10/2014 - Present	INTERNATIONAL ASSETS ADVISORY	ORLANDO, FL
09/2014 - 10/2014	WUNDELRIK SECURITIES, INC.	MEMPHIS, TN
11/2001 - 09/2014	LPL FINANCIAL, LLC	HOUSTON, TX
07/2006 - 07/2013	JAMES E. BASHAW & CO.	HOUSTON, TX



Registration and Employment History

Other Business Activities

This section includes information, if any, as provided by the broker regarding other business activities the broker is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious or fraternal and is recognized as tax exempt.

- 1) JAMES E BASHAW & CO - 5200 SAN FELIPE, HOUSTON, TX 77056 - DBA FOR IAA BUSINESS - CEO SINCE 11/2001 - APPROX 160 HRS/MO - COMMISSIONS
 - 2) JEB & CO. 5200 SAN FELIPE, HOUSTON, TX 77056 - DBA FOR IAA BUSINESS - CEO SINCE 7/2017 - APPROX 160 HRS/MO - COMMISSIONS
 - 3) INTERNATIONAL ASSETS INVESTMENT MANAGEMENT 390 N ORANGE AVE STE 750 ORLANDO, FL 32801 - RIA AFFILIATE OF INTERNATIONAL ASSETS ADVISORS - ADVISOR SINCE 10/2014 - APPROX 80 HRS/MO - COMPENSATED FROM FEES
 - 4) CATHOLIC ENDOWMENT FOUNDTION GALVESTON-HOUSTON 1700 SAN JACINTO, HOUSTON, TX 77002 - DIRECTOR OF INVESTMENT COMMITTEE - ADVISE PRO BONO FOR THE CEFGR SINCE 1999 - APPROX 2 HRS/MO - NO COMPENSATION
 - 5) JAMES E BASHAW & CO. 5200 SAN FELIPE, HOUSTON, TX 77056 - SELL EXCESS WATER TREATMENT CAPACITY FOR DEVELOPMENT IN HORTON TO DEVELOPERS - 100% OWNER SINCE 10/2016 - APPROX 2 HRS/MO - FEE FOR SELLING PERMITTING
 - 6) DON ALEX HANNA II, TRUSTEE OF THE DON ALEX HANNA GST EXEMPT TRUST 70 EAST BROAD OAKS LANE HORTON, TX 77050 - NON INVESTMENT RELATED - OWNER OF WASTEWATER CAPACITY - SELLER OF WASTEWATER CAPACITY SINCE 10/2016 - APPROX 2 HRS/MO - COMMISSION BASED COMPENSATION
 - 7) BSK LEASE MANAGEMENT US HIGHWAY 77 WEST, DEFUGIO, TX 78377 - MANAGER OF HUNTING LEASE SINCE 8/2018 - APPROX 5 HRS/MO - NO COMPENSATION
-



Disclosure Events

What you should know about reported disclosure events:

1. All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
 - o A law enforcement agency must file formal charges before a broker is required to disclose a particular criminal event.
 - o A customer dispute must involve allegations that a broker engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.
 - o
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - o As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, brokerage firms and regulators. When more than one of these sources reports information for the same disclosure event, all 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.
 - o
4. **There are different statuses and dispositions for disclosure events:**
 - o 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.
 - o 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 brokers and brokerage 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.

For your convenience, below is a matrix of the number and status of disclosure events involving this broker. Further information regarding these events can be found in the subsequent pages of this report. You also may wish to contact the broker to obtain further information regarding these events.

	Pending	Final	On Appeal
Customer Dispute	0	3	N/A



Investigation	1	N/A	N/A
Termination	N/A	1	N/A
Financial	1	0	N/A
Judgment/Lien	1	N/A	N/A



Disclosure Event Details

When evaluating this information, please keep in mind that a disclosure event may be pending or involve allegations that are contested and have not been resolved or proven. The matter may, in the end, be withdrawn, dismissed, resolved in favor of the broker, or concluded through a negotiated settlement for certain business reasons (e.g., to maintain customer relationships or to limit the litigation costs associated with disputing the allegations) with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to CRD and therefore some of the specific data fields contained in the report may be blank if the information was not provided to CRD.

Customer Dispute - Settled

This type of disclosure event involves a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit containing allegations of sale practice violations against the broker that resulted in a monetary settlement to the customer.

Disclosure 1 of 3

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	LPL FINANCIAL, LLC
Allegations:	CLAIMANTS ALLEGE UNSUITABLE INVESTMENTS, BORROWING FROM CUSTOMERS, PRIVATE SECURITIES TRANSACTIONS, AND FAILURE TO SUPERVISE WITH RESPECT TO PROMISSORY NOTES PROVIDED BY MR. BASHAW AND MR. BASHAW'S RECOMMENDING INVESTMENTS IN TEXAS AIR SHUTTLE, LLC. ACTIVITY PERIOD 12/18/09 - 5/1/15.
Product Type:	Promissory Note Other: PRIVATE SECURITIES TRANSACTION
Alleged Damages:	\$3,800,000.00
Is this an oral complaint?	No
Is this a written complaint?	No
Is this an arbitration/CFTC reparation or civil litigation?	Yes
Arbitration/Reparation forum or court name and location:	FINRA
Docket/Case #:	16-02452



Filing date of arbitration/CFTC reparation or civil litigation: 08/18/2016

Customer Complaint Information

Date Complaint Received: 09/02/2016
Complaint Pending? No
Status: Settled
Status Date: 11/30/2017
Settlement Amount: \$1,900,000.00
Individual Contribution Amount: \$0.00

Reporting Source: Broker
Employing firm when activities occurred which led to the complaint: LPL FINANCIAL, LLC

Allegations: CLAIMANTS ALLEGE UNSUITABLE INVESTMENTS, BORROWING FROM CUSTOMERS, PRIVATE SECURITIES TRANSACTIONS, AND FAILURE TO SUPERVISE WITH RESPECT TO PROMISSORY NOTES PROVIDED BY MR. BASHAW AND MR. BASHAWS RECOMMENDING INVESTMENTS IN TEXAS AIR SHUTTLE, LLC. ACTIVITY PERIOD 12/18/09-5/1/15.

Product Type: Futures-Financial
 Promissory Note
 Other: PRIVATE SECURITIES TRANSACTIONS

Alleged Damages: \$3,800,000.00

Is this an oral complaint? No

Is this a written complaint? No

Is this an arbitration/CFTC reparation or civil litigation? Yes

Arbitration/Reparation forum or court name and location: FINRA

Docket/Case #: 16-02452



Filing date of arbitration/CFTC reparation or civil litigation: 08/18/2016

Customer Complaint Information

Date Complaint Received: 09/02/2016

Complaint Pending? No

Status: Settled

Status Date: 11/30/2017

Settlement Amount: \$1,900,000.00

Individual Contribution Amount: \$0.00

Broker Statement

The [CUSTOMER NAME] parties never complained, suggested, or accused FA of unsuitable investments or private securities transactions until LPL Financial submitted and issued defamatory statements to FINRA and the media in September of 2014. FA did not recommend any investment in Texas Air Shuttle and the multi-million-dollar sophisticated lender invested in FA's company (and several unrelated companies and enterprises) in the regular course of its business in the pursuit of above-market gains over a course of 15 years or more. FA repaid hundreds of thousands of dollars on the notes between 2011 and his termination by LPL Financial. LPL Financial belatedly used the [CUSTOMER NAME] business loan, that its President [THIRD PARTY NAME] approved and that FA disclosed to LPL Financial auditors years before his termination, in order to terminate him and seize his employees, representatives, and clients. In doing so, LPL Financial prevented FA from fully satisfying his obligations to a highly sophisticated long-time friend and LPL Financial client that LPL Financial itself injured with its strategic termination of FA without just cause or notice. FA's Company never denied its repayment obligations and it made substantial ongoing payments until LPL Financial destroyed FA's Company.

Disclosure 2 of 3

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: LPL FINANCIAL



Allegations: THAT UITS PURCHASED IN 2011 WERE UNSUITABLE.

Product Type: Unit Investment Trust

Alleged Damages: \$20,804.28

Is this an oral complaint? No

Is this a written complaint? Yes

**Is this an arbitration/CFTC
reparation or civil litigation?** No

Customer Complaint Information

Date Complaint Received: 04/26/2012

Complaint Pending? No

Status: Settled

Status Date: 07/31/2012

Settlement Amount: \$10,000.00

**Individual Contribution
Amount:** \$10,000.00

Disclosure 3 of 3

Reporting Source: Firm

**Employing firm when
activities occurred which led
to the complaint:** KIDDER PEABODY & CO.

Allegations: BREACH OF FIDUCIARY DUTY-CHURNING, OBJECTIVES
NOT FOLLOWED CLAIM-\$620,000 ACTUAL \$1,000,000. PUNITIVE

Product Type:

Alleged Damages: \$620,000.00

Customer Complaint Information

Date Complaint Received:

Complaint Pending? No

Status: Arbitration/Reparation

Status Date:

**Settlement Amount:**

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: National Association of Securities Dealers, Inc.; 89-1613

Date Notice/Process Served: 06/28/1988

Arbitration Pending? No

Disposition: Settled

Disposition Date: 12/01/1990

Monetary Compensation Amount: \$200,000.00

Individual Contribution Amount: \$0.00

Firm Statement KIDDER, PEABODY PAID \$200,000. IN SETTLEMENT PREVIOUSLY REPORTED AS A WRITTEN CUSTOMER COMPLAINT FILED WITH KIDDER, PEABODY ON 06/28/883

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: KIDDER PEABODY & CO.

Allegations: BREACH OF FIDUCIARY DUTY, CHURNING OBJECTIVES NOT FOLLOWED. CLAIM \$620,000 ACTUAL DAMAGES AND \$1,000,000 PUNITIVE DAMAGES.

Product Type: Other

Alleged Damages: \$620,000.00

Customer Complaint Information

Date Complaint Received: 06/28/1988

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 01/07/1991

**Settlement Amount:**

**Individual Contribution
Amount:**

Arbitration Information

**Arbitration/Reparation Claim
filed with and Docket/Case
No.:** NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.; 89-1613

Date Notice/Process Served: 06/28/1988

Arbitration Pending? No

Disposition: Settled

Disposition Date: 12/01/1990

**Monetary Compensation
Amount:** \$200,000.00

**Individual Contribution
Amount:** \$0.00

Broker Statement

KIDDER PEABODY SETTLED THE CLAIM FOR \$200,000 PRIOR TO ARBITRATION. [CUSTOMER] WAS LONG TIME FAMILY FRIEND AND CLIENT. HE OWNED A SEAT ON THE MEXICAN STOCK MARKET, VOLKSWAGEN DEALERSHIPS, RANCHES, BANKS, AND HOTELS. ON OCTOBER 19, 1987 HIS ACCOUNT WAS HEAVILY MNARGINED AND SUFFERED A DROP IN MARKET VALUE DUE TO BLACK MONDAY. HE REFUSED TO COVER AND THE FIRM SOLD OUT HIS POSITIONS TO COVER HIS MARGION CALL. SUBSEQUENTLY, HE FILE SUIT AND FORGOT HE KNEW HOW TO SPEAK ENGLISH.



Investigation

This type of disclosure event involves any ongoing formal investigation by an entity such as a grand jury state or federal agency, self-regulatory organization or foreign regulatory authority. Subpoenas, preliminary or routine regulatory inquiries, and general requests by a regulatory entity for information are not considered investigations and therefore are not included in a BrokerCheck report.

Disclosure 1 of 1

Reporting Source: Regulator

Initiated By: FINRA

Notice Date: 10/09/2018

Details: Wells Notice Examination Case #20140428765: On October 9, 2018, FINRA made a preliminary determination to recommend that disciplinary action be brought against James E. Bashaw, alleging that Mr. Bashaw: borrowed money from a customer without notifying his member firm prior to borrowing the money and without obtaining written approval from his member firm prior to borrowing the money, in violation of FINRA Rules 3240 and 2010; provided false answers to his member firm on annual questionnaires concerning the loans he accepted from a customer, in violation of FINRA Rule 2010; failed to amend his Form U4 to disclose a judgment obtained in connection with the loans he accepted from a customer within 30 days of learning of the judgment, in violation of Article V, Section 2(c) of FINRA's By-Laws, and FINRA Rules 1122 and 2010; borrowed money from a customer without notifying his member firm prior to borrowing the money and without obtaining written approval from his member firm prior to borrowing the money, in violation of FINRA Rules 3240 and 2010; provided false answers to his member firm on an annual questionnaire concerning the loans he accepted from a customer, in violation of FINRA Rule 2010; and provided false and misleading information to FINRA in response to a request for information issued pursuant to FINRA Rule 8210 by falsely denying that he personally received money from clients and by failing to identify all loans made to him by a customer, in violation of FINRA Rules 8210 and 2010.

Is Investigation pending? Yes

Reporting Source: Broker

Initiated By: FINRA

Notice Date: 10/09/2018

Details: BORROWING MONEY FROM A CUSTOMER, PROVIDING FALSE ANSWERS TO HIS MEMBER FIRM ON ANNUAL QUESTIONNAIRES, FAILING TO AMEND HIS FORM U4 TO DISCLOSE A JUDGEMENT.



Is Investigation pending?

Yes



Employment Separation After Allegations

This type of disclosure event involves a situation where the broker voluntarily resigned, was discharged, or was permitted to resign after being accused of (1) violating investment-related statutes, regulations, rules or industry standards of conduct; (2) fraud or the wrongful taking of property; or (3) failure to supervise in connection with investment-related statutes, regulations, rules, or industry standards of conduct.

Disclosure 1 of 1

Reporting Source: Firm

Employer Name: LPL FINANCIAL LLC

Termination Type: Discharged

Termination Date: 09/24/2014

Allegations: REPRESENTATIVE DISCHARGED FOR (A) PARTICIPATING IN PRIVATE SECURITIES TRANSACTIONS WITHOUT PROVIDING WRITTEN DISCLOSURE TO AND OBTAINING WRITTEN APPROVAL FROM THE FIRM, (B) BORROWING FROM A CLIENT, AND (C) ENGAGING IN A BUSINESS TRANSACTION THAT CREATED A POTENTIAL CONFLICT OF INTEREST WITHOUT PROVIDING WRITTEN DISCLOSURE TO AND OBTAINING WRITTEN APPROVAL FROM THE FIRM.

Product Type: Mutual Fund
Other: PRIVATE PLACEMENTS

Reporting Source: Broker

Employer Name: LPL FINANCIAL

Termination Type: Discharged

Termination Date: 09/24/2014

Allegations: FAILURE TO FOLLOW FIRM POLICIES AND INDUSTRY REGULATIONS

Product Type: No Product

Broker Statement FA Bashaw contests the accuracy, validity, and motive for the purported reasons for termination. As such, FA Bashaw has brought a legal action against LPL Financial and its President, Mark S. Casady, alleging misrepresentation, defamation, raiding, breach of fiduciary duty, and business interference. FA Bashaw is also seeking expungement of this disclosure. The loans at issue were verbally approved by LPL Financial's President, Mark S. Casady, and were issued to FA Bashaw's Company by a multi-million-dollar lender Blackwell (and BPM Investments, Inc.) that invested in various entities in its regular course of business. The loans were disclosed to LPL Financial during LPL's routine audit of JebCo. in 2011 - 2012. LPL Financial's home office supervised FA Bashaw and all of the



transactions at issue were conducted through LPL's e-mail server and information concerning the transactions was available for review during multiple internal LPL Financial audits. FA Bashaw did not engage in any private securities transactions. Moreover, the transactions at issue were non-compensatory. Tellingly, LPL Financial did not offer recession to any investors in accord with industry standards. Any alleged potential conflict of interest three years prior to the termination was facilitated by LPL Financial and its President, to their benefit. Finally, there were no customer complaints for any of the above and LPL Financial avoided asking FA Bashaw a single question before or after the termination, even though FA Bashaw was with President Mark S. Casady's at his home on Cape Cod just weeks before the termination.



Financial - Pending

This type of disclosure event involves a pending bankruptcy, compromise with one or more creditors, or Securities Investor Protection Corporation liquidation involving the broker or an organization/brokerage firm the broker controlled that occurred within the last 10 years.

Disclosure 1 of 1

Reporting Source:	Broker
Action Type:	Bankruptcy
Bankruptcy:	Chapter 11
Action Date:	11/29/2017
Organization Investment-Related?	
Type of Court:	Federal Court
Name of Court:	UNITED STATES BANKRUPTCY COURT
Location of Court:	SOUTHERN DISTRICT OF TEXAS, HOUSTON
Docket/Case #:	17-36431
Action Pending?	Yes



Judgment / Lien

This type of disclosure event involves an unsatisfied and outstanding judgments or liens against the broker.

Disclosure 1 of 1

Reporting Source:	Broker
Judgment/Lien Holder:	BLACKWELL MANAGEMENT TRUST OF 2009
Judgment/Lien Amount:	\$1,900,000.00
Judgment/Lien Type:	Civil
Date Filed with Court:	02/10/2017
Date Individual Learned:	02/10/2017
Type of Court:	Federal Court
Name of Court:	DISTRICT COURT OF HARRIS COUNTY
Location of Court:	HARRIS COUNTY, TEXAS
Docket/Case #:	2016-27497
Judgment/Lien Outstanding?	Yes

End of Report



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