

BrokerCheck Report

KEVIN JAMES PALMER

CRD# 1370541

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When communicating online or investing with any professional, make sure you know who you're dealing with. <u>Imposters</u> might link to sites like BrokerCheck from <u>phishing</u> or similar scam websites, or through <u>social media</u>, 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:
 - 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.

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.

www.finra.org/brokercheck User Guidance

KEVIN J. PALMER

CRD# 1370541

This broker is not currently registered.

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 not currently registered.

This broker has passed:

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

Registration History

This broker was previously registered with the following securities firm(s):

- B FIRST ALLIED SECURITIES, INC. CRD# 32444
 SCOTTSDALE, AZ
 12/2008 02/2018
- FIRST MONTAUK SECURITIES CORP.
 CRD# 13755
 SCOTTSDALE, AZ
 05/2001 12/2008
- B MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED
 CRD# 7691
 NEW YORK, NY
 11/1994 06/2001

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:

Туре	Count
Criminal	1
Customer Dispute	2
Termination	2

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

www.finra.org/brokercheck
User Guidance

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 broker is not currently registered.

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. A passed exam or exam waiver does not permit a broker to do business without an active SRO or state registration.

This individual has passed 1 principal/supervisory exam, 2 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	1	Category	Date
В	General Securities Sales Supervisor Examination (Options Module & General Module)	Series 8	02/21/1998

General Industry/Product Exams

Exam		Category	Date
B	Securities Industry Essentials Examination	SIE	02/21/2018
B	General Securities Representative Examination	Series 7	05/18/1985

State Securities Law Exams

Exam	1	Category	Date
IA	Uniform Investment Adviser Law Examination	Series 65	06/18/2004
В	Uniform Securities Agent State Law Examination	Series 63	06/07/1985

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/.

www.finra.org/brokercheck
User Guidance

Broker Qualifications



Professional Designations

This section details that the representative has reported **0** professional designation(s).

No information reported.

Registration and Employment History



Registration History

The broker previously was registered with the following firms:

Reg	istration Dates	Firm Name	CRD#	Branch Location
B	12/2008 - 02/2018	FIRST ALLIED SECURITIES, INC.	32444	SCOTTSDALE, AZ
B	05/2001 - 12/2008	FIRST MONTAUK SECURITIES CORP.	13755	SCOTTSDALE, AZ
В	11/1994 - 06/2001	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	7691	NEW YORK, NY
B	06/1985 - 10/1994	PAINEWEBBER INCORPORATED	8174	WEEHAWKEN, NJ

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	Employer Name	Position	Investment Related	Employer Location
02/2018 - Present	SHARPEPOINT, LLC	INVESTMENT ADVISOR REPRESENTATIVE	Υ	PHOENIX, AZ, United States
07/2012 - 02/2018	FIRST ALLIED ADVISORY SERVICES, INC.	MASS TRANSFER - INVESTMENT ADVISOR REPRESENTATIVE	Υ	CHESTERFIELD, MO, United States
12/2008 - 02/2018	FIRST ALLIED SECURITIES, INC.	MASS TRANSFER	Υ	SAN DIEGO, CA, United States

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.) SMA INSTITUTE; DIRECTOR; NON-INVESTMENT RELATED; RESEARCH AND ADVOCACY FIRM FOR HUMAN RIGHTS; 10 HOURS/MO NOT DURING TRADING HOURS; START DATE: 12/2008
- 2.) PHG DEVELOPMENT CO; BOARD OF DIRECTORS; ADVISOR CAPACITY ONLY FOR WIFE'S REAL ESTATE BUSINESS; NOT

Registration and Employment History



Other Business Activities, continued

INVESTMENT RELATED; 4 HOURS/MO; START DATE 01/01/1987

- 3.) NEXT DOOR LLC; INVESTOR; CREATED FOR ACCOUNTING AND/OR TAX PURPOSES RELATED TO PERSONAL REAL ESTATE INVESTING; Start Date 03/01/2017; 2 HRS/MO NOT DURING TRADING HOURS.
- 4.) EAST 2 WEST LLC; CREATED FOR ACCOUNTING AND/OR TAX PURPOSES RELATED TO PERSONAL REAL ESTATE INVESTING; Start Date 06/01/2017; 0 HRS/MO.
- 5.) ACBF (AZ CHILDREN'S BOOKALICIOUS FOUNDATION); BOARD OF DIRECTORS; LITERACY NON-PROFIT; START DATE: 01/01/2014; 4 HOURS PER MONTH NOT DURING TRADING HOURS.

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.
- 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.

3. Disclosure events in BrokerCheck reports come from different sources:

 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.

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
Criminal	0	1	0
Customer Dispute	0	2	N/A
Termination	N/A	2	N/A



Disclosure Event Details

When evaluating this information, please keep in mind that a discloure 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.

Criminal - Final Disposition

This type of disclosure event involves a criminal charge against the broker that has resulted in a conviction, acquittal, dismissal, or plea. The criminal matter may pertain to any felony or certain misdemeanor offenses, including bribery, perjury, forgery, counterfeiting, extortion, fraud, and wrongful taking of property.

Disclosure 1 of 1

Reporting Source: Broker

Court Details: OSWEGO TOWN COURT, OSWEGO, NY

DOCKET NO. 74 128

Charge Date: 09/30/1974

Charge Details: CHARGED WITH MISDEMEANOR UNDER SECTION 155.25

OF THE PENAL LAW OF THE STATE OF NEW YORK (PETTY LARCENY)

SHOPLIFTING A \$14.00 ITEM FROM COLLEGE BOOK STORE.

Felony? No

Current Status: Final

Status Date: 10/09/1974

Disposition Details: PLED GUILTY TO DISORDERLY CONDUCT (SECTION

240.20 P.I.) FINED \$100.00

Broker Statement THIS WAS A PLEDGING PRANK WHILE IN COLLEGE THAT

OCCURRED WITH SOME TEAM MASTESIN THE STUDENT BOOK STORE ON

CAMPUS. IT INVOLVED A \$14.00 ITEM THAT WAS OF NO PERSONAL SIGNIFICANCE (A PRANK). THE CAMPUS POLICE INSTRUCTED US TO

FOLLOW THEIR DIRECTIONS AND THEY WOULD PERMIT OUR

GRADUTATION

AND NOT INFORM OUR PARENTS. I HAD NO IDEA THAT IT WAS AN ACTUAL CHARGE OUTSIDE THE JURISDICTION OF THE UNIVERSITY AND

HAVE SINCE FILED FOR EXPUNGEMENT OR ORDER TO VACATE.



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 2

Reporting Source: Broker

Employing firm when activities occurred which led

MERRILL LYNCH

to the complaint:

Allegations: CLAIMANT ALLEGES THE FINANCIAL CONSULTANT PURCHASED

UNSUITABLE SECURITIES.

Product Type: Debt - Corporate

Alleged Damages: \$245,931.14

Customer Complaint Information

Date Complaint Received: 05/22/2000

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 10/10/2000

Settlement Amount:

Individual Contribution

Amount:

Arbitration Information

Arbitration/Reparation Claim

filed with and Docket/Case

No.:

Date Notice/Process Served: 10/10/2000

Arbitration Pending? No

Disposition: Settled

Disposition Date: 03/28/2001

Monetary Compensation

Amount:

Individual Contribution

\$0.00

\$31,500.00

NASD 00-01529

Amount:



Broker Statement RESPONDENTS DENY THE ALLEGATIONS. THE INVESTMENTS WERE

SUITABLE AND AUTHORIZED BY THE CLAIMANTS. THE FC FULLY

EXPLAINED THE INVESTMENTS TO THE CUSTOMERS. THE MATTER WAS

SETTLED SOLEY TO AVOID THE EXPENSE AND UNCERTAINTY OF

LITIGATION.

Disclosure 2 of 2

Reporting Source: Firm

Employing firm when

activities occurred which led

to the complaint:

Allegations:

PAINEWEBBER, INC.

clients allege they were not informed that

megafood shares purchased 1-94 were junk bonds. client lost

\$13,000.

Product Type:

Alleged Damages: \$13,000.00

Customer Complaint Information

Date Complaint Received: 10/04/1994

Complaint Pending? No

Status: Settled

Status Date:

Settlement Amount: \$16,610.05

Individual Contribution

Amount:

\$0.00

Firm Statement settled in the amount of \$16,610.05.

Not Provided

Reporting Source: Broker

Employing firm when activities occurred which led

PAINEWEBBER, INC.

to the complaint:

Allegations: CUSTOMER ALLEGES THAT KEVIN PALMER FAILED TO

INFORM THEM THAT THEIR INVESTMENT IN MEGA FOOD SENIOR NOTES 10.25% DUE 10-15-2000 AND PURCHASED JANUARY, 1994 WERE JUNK



BONDS. CUSTOMER ALLEGES LOSSES IN THE AMOUNT OF \$13,000.

Product Type: Other

Other Product Type(s): BONDS

Alleged Damages: \$13,000.00

Customer Complaint Information

Date Complaint Received: 10/04/1994

Complaint Pending? No

Status: Settled

Status Date: 11/09/1994

Settlement Amount: \$16,610.05

Individual Contribution

Amount:

\$0.00

Broker Statement PAYMENT BY PAINE WEBBER OF \$16,610.05

THE CLIENT CLEARLY KNEW WHAT TYPE OF BOND THIS

WAS. IN FACT, WE SOLD PART OF THE BOND DURING THE SPRING OF '94 BECAUSE OF IT'S QUESTIONABLE PERFORMANCE. SUBSEQUENTLY, MEGA FOODS FILED FOR BANKRUPTCY AND THIS SITUATION IS CURRENTLY BEING ADDRESSED IN A CLASS ACTION SUIT BY BONDHOLDERS.



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 2

Reporting Source: Firm

Employer Name: FIRST ALLIED ADVISORY SERVICES, INC

Termination Type: Discharged

Termination Date: 02/06/2018

Allegations: RR exercised discretion in 2 client's accounts without the firm's approval in

violation of firm policy.

Product Type: Equity Listed (Common & Preferred Stock)

Disclosure 2 of 2

Reporting Source: Firm

Employer Name: FIRST ALLIED SECURITIES, INC

Termination Type: Discharged

Termination Date: 02/06/2018

Allegations: RR exercised discretion in 2 client's accounts without the firm's approval in

violation of firm policy.

Product Type: Equity Listed (Common & Preferred Stock)

End of Report



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