

BrokerCheck Report

SCOTT ERIK AABEL

CRD# 1493667

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Please be aware that fraudsters may link to BrokerCheck from phishing and similar scam websites, trying to steal your personal information or your money. Make sure you know who you're dealing with when investing, and contact FINRA with any concerns.

For more information read our [investor alert](#) on imposters.

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.

**SCOTT E. AABEL**

CRD# 1493667

Currently employed by and registered with the following Firm(s):

B SPIRE SECURITIES, LLC
 412 Tamiami Trail S
 Osprey, FL 34229
 CRD# 144131
 Registered with this firm since: 12/06/2016

IA SPIRE WEALTH MANAGEMENT, LLC
 412 Tamiami Trail S
 Osprey, FL 34229
 CRD# 113908
 Registered with this firm since: 01/06/2017

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
- 1 U.S. state or territory

This broker has passed:

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

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

- IA INVESTORS CAPITAL ADVISORY**
 CRD# 30613
 LYNNFIELD, MA
 01/2016 - 08/2016
- B INVESTORS CAPITAL CORP.**
 CRD# 30613
 NOKOMIS, FL
 01/2016 - 08/2016
- IA SAGEPOINT FINANCIAL, INC.**
 CRD# 133763
 PHOENIX, AZ
 07/2013 - 01/2016

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
Regulatory Event	2
Customer Dispute	12
Financial	1
Judgment/Lien	8



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 1 U.S. state or territory through his or her employer.

Employment 1 of 2

Firm Name: **SPIRE SECURITIES, LLC**
 Main Office Address: **7901 JONES BRANCH DR.
 SUITE 810
 MCLEAN, VA 22102**
 Firm CRD#: **144131**

SRO	Category	Status	Date
B FINRA	Direct Participation Programs	Approved	12/06/2016
B FINRA	General Securities Representative	Approved	12/06/2016
B FINRA	Invest. Co and Variable Contracts	Approved	12/06/2016

U.S. State/ Territory	Category	Status	Date
B Florida	Agent	Approved	01/06/2017

Branch Office Locations

SPIRE SECURITIES, LLC
 412 Tamiami Trail S
 Osprey, FL 34229

Employment 2 of 2

Firm Name: **SPIRE WEALTH MANAGEMENT, LLC**
 Main Office Address: **7901 JONES BRANCH DR.
 SUITE 810
 MCLEAN, VA 22102**
 Firm CRD#: **113908**

Broker Qualifications



Employment 2 of 2, continued

U.S. State/ Territory		Category	Status	Date
IA	Florida	Investment Adviser Representative	Approved	01/06/2017

Branch Office Locations

This individual does not have any registered Branch Office where the individual is located.



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 0 principal/supervisory exams, 4 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
No information reported.		

General Industry/Product Exams

Exam	Category	Date
B Securities Industry Essentials Examination	SIE	10/01/2018
B General Securities Representative Examination	Series 7	06/08/2012
B Direct Participation Programs Representative Examination	Series 22	06/10/1993
B Investment Company Products/Variable Contracts Representative Examination	Series 6	02/19/1991

State Securities Law Exams

Exam	Category	Date
IA Uniform Investment Adviser Law Examination	Series 65	05/23/2008
B Uniform Securities Agent State Law Examination	Series 63	12/22/1988

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/.

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:

Registration Dates	Firm Name	CRD#	Branch Location
IA 01/2016 - 08/2016	INVESTORS CAPITAL ADVISORY	30613	NOKOMIS, FL
B 01/2016 - 08/2016	INVESTORS CAPITAL CORP.	30613	NOKOMIS, FL
IA 07/2013 - 01/2016	SAGEPOINT FINANCIAL, INC.	133763	NOKOMIS, FL
B 03/2013 - 01/2016	SAGEPOINT FINANCIAL, INC.	133763	NOKOMIS, FL
IA 06/2008 - 04/2013	ASSET & FINANCIAL PLANNING, LTD	110709	NOKOMIS, FL
B 05/1991 - 04/2013	PRIME CAPITAL SERVICES, INC.	18334	NOKOMIS, FL
B 02/1991 - 05/1991	LUTHERAN BROTHERHOOD SECURITIES CORP.	4205	MINNEAPOLIS, MN

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
09/2016 - Present	Premier Retirement Asset Management	Partner	Y	Nokomis, FL, United States
09/2016 - Present	Spire Wealth Management, LLC	IAR	Y	Nokomis, FL, United States
01/2016 - Present	THE ADVISORS PLANNING GROUP, LLC	PRESIDENT	Y	NOKOMIS, FL, United States
01/2016 - 08/2016	INVESTORS CAPITAL CORP.	REGISTERED REPRESENTATIVE/INVESTMENT ADVISOR REPRESENTATIVE	Y	LYNNFIELD, MA, United States
03/2013 - 12/2015	SAGEPOINT FINANCIAL INC	REGISTERED REPRESENTATIVE	Y	NOKOMIS, FL, United States



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) Name of other business: Premier Retirement Asset Management.

Investment related: Yes

Address: 2520 N. Tamiami Trail, Nokomis, FL 34275

Nature of business: DBA under which IAR and RR activities of Spire Wealth Management and Spire Securities are conducted. LTC, Fixed Annuities, Life Insurance

Start date: 8/1987

Position/title/relationship: President

Apx number of hours per week: 25

Apx number of hours during trading hours: 25

Brief description of duties: Market, service life insurance, LTC, fixed annuities

2) Name of other business: Advisors Planning Group, LLC

Investment related: No

Address: 2520 N. Tamiami Trail, Nokomis, FL 34275

Nature of business: Property management, real estate/our building

Start date: 6/11/2000

Position/title/relationship: Partner

Apx number of hours per week: 0

Apx number of hours during trading hours: 0

Brief description of duties: Handle rental of office space.

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:**
 - 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.
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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 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
Regulatory Event	0	2	0
Customer Dispute	1	11	N/A
Financial	0	1	N/A
Judgment/Lien	8	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.

Regulatory - Final

This type of disclosure event may involve (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory such as the Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of a broker's authority to act as an attorney, accountant, or federal contractor.

Disclosure 1 of 2

Reporting Source: Regulator

Regulatory Action Initiated By: FINRA

Sanction(s) Sought:

Date Initiated: 09/16/2016

Docket/Case Number: 2012033732901

Employing firm when activity occurred which led to the regulatory action: Prime Capital Services, Inc.

Product Type: No Product

Allegations: Without admitting or denying the findings, Aabel consented to the sanctions and to the entry of findings that he failed to timely amend his Form U4 to reflect reportable events. The findings stated that while associated with a member firm, Aabel entered into separate arrangements pursuant to which he settled the amounts due and owed on credit cards by entering into compromises with the credit card companies. Aabel did not disclose the compromises with the credit card companies to the firm, and he also did not update his Form U4 to reflect the compromises.

Current Status: Final

Resolution: Acceptance, Waiver & Consent(AWC)



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

No

Resolution Date:

09/16/2016

Sanctions Ordered:

Civil and Administrative Penalty(ies)/Fine(s)
Suspension

If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?

No

(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?



(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or

(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Sanction 1 of 1

Sanction Type:	Suspension
Capacities Affected:	Any capacity
Duration:	30 business days
Start Date:	09/19/2016
End Date:	10/28/2016

**Monetary Sanction 1 of 1****Monetary Related Sanction:** Civil and Administrative Penalty(ies)/Fine(s)**Total Amount:** \$5,000.00**Portion Levied against individual:** \$5,000.00**Payment Plan:** deferred**Is Payment Plan Current:****Date Paid by individual:** 08/02/2017**Was any portion of penalty waived?** No**Amount Waived:****Reporting Source:** Broker**Regulatory Action Initiated By:** FINRA**Sanction(s) Sought:** Civil and Administrative Penalty(ies)/Fine(s)
Suspension**Date Initiated:** 09/16/2016**Docket/Case Number:** 2012033732901**Employing firm when activity occurred which led to the regulatory action:** Prime Capital Services**Product Type:** No Product**Allegations:** Failure to timely disclose compromise with creditors to the firm and did not update his U4 to reflect the compromises.**Current Status:** Final**Resolution:** Acceptance, Waiver & Consent(AWC)



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Resolution Date: 09/16/2016

Sanctions Ordered: Civil and Administrative Penalty(ies)/Fine(s)
Suspension

Sanction 1 of 1

Sanction Type: Suspension

Capacities Affected: All Capacities

Duration: 30 Business Days

Start Date: 09/19/2016

End Date: 10/28/2016

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$5,000.00

Portion Levied against individual: \$5,000.00

Payment Plan: Deferred

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Disclosure 2 of 2

Reporting Source: Regulator

Regulatory Action Initiated By: FLORIDA OFFICE OF FINANCIAL REGULATION ("OFFICE"), DIVISION OF SECURITIES

Sanction(s) Sought: Cease and Desist



Civil and Administrative Penalty(ies)/Fine(s)
Other: UP TO AND INCLUDING RESTRICTION, SUSPENSION OR
REVOCATION

Date Initiated: 04/06/2012
Docket/Case Number: 0576B-S-10/11
URL for Regulatory Action:

Employing firm when activity occurred which led to the regulatory action: PRIME CAPITAL SERVICES, INC. AND
ASSET & FINANCIAL PLANNING,LTD

Product Type: Annuity-Variable

Allegations: FILED ADMINISTRATIVE COMPLAINT ALLEGING VIOLATON OF SECTION
517.161(1)(H), FLORIDA STATUTES, RULE 69W-600.013(1)(H)1.,(2)(H),
FLORIDA ADMINISTRATIVE CODE, AND NASD CONDUCT RULE 2110 AND
FINRA CONDUCT RULE 2010.

Current Status: Final

Resolution: Order

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Resolution Date: 01/30/2013

Sanctions Ordered: Civil and Administrative Penalty(ies)/Fine(s)
Restitution

Monetary Sanction 1 of 2

Monetary Related Sanction: Restitution

Total Amount: \$100,000.00

Portion Levied against individual: \$100,000.00

Payment Plan: NONE

Is Payment Plan Current: No

Date Paid by individual:



Was any portion of penalty waived? No

Amount Waived:

Monetary Sanction 2 of 2

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$70,000.00

Portion Levied against individual: \$70,000.00

Payment Plan: NONE

Is Payment Plan Current: No

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Regulator Statement ON 1/30/2013, THE OFFICE OF FINANCIAL REGULATION ("OFFICE") ENTERED A FINAL ORDER ADOPTING THE STIPULATION AND CONSENT AGREEMENT IN THE MATTER OF SCOTT AABEL ("RESPONDENT"). RESPONDENT NEITHER ADMITTED NOR DENIED THE FINDINGS BUT CONSENTED TO THE ENTRY OF FINDINGS BY THE OFFICE. THE OFFICE FOUND THAT RESPONDENT VIOLATED SECTIONS 517.161(1)(H), FLORIDA STATUTES, AND RULE 69W-600.013(1)(H)(1)., (2)(H), FLORIDA ADMINISTRATIVE CODE, NASD CONDUCT RULE 2110 AND FINRA CONDUCT RULE 2010 AS REFERENCED IN RULE 69W-600.013(1)(H)1. RESPONDENT AGREES TO CEASE AND DESIST FROM ANY AND ALL FUTURE VIOLATIONS OF CHAPTER 517, F.S. AND THE ADMINISTRATIVE RULES THEREUNDER. RESPONDENT SHALL PAY AN ADMINISTRATIVE FINE IN THE AMOUNT OF \$70,000.00, COSTS OF \$26,175.00 AND DAMAGES IN THE AMOUNT OF \$100,000.00 TO THOSE IMPACTED INVESTORS WHO HOLD THE JNL VARIABLE ANNUITY.

Reporting Source: Broker

Regulatory Action Initiated By: FLORIDA OFFICE OF FINANCIAL REGULATION ("OFFICE"), DIVISION OF SECURITIES

Sanction(s) Sought: Cease and Desist
Civil and Administrative Penalty(ies)/Fine(s)
Other: UP TO AND INCLUDING RESTRICTON, SUSPENSION OR



REVOCATION

Date Initiated:	04/06/2012
Docket/Case Number:	0576B-S-10/11
Employing firm when activity occurred which led to the regulatory action:	PRIME CAPITAL SERVICES, INC. AND ASSET & FINANCIAL PLANNING, LTD
Product Type:	Annuity-Variable
Allegations:	FILED ADMINISTRATIVE COMPLAINT ALLEGING VIOLATION OF SECTION 517.161(1)(H), FLORIDA STATUTES, RULE 69W-600.013(1)(H)1.,(2)(H), FLORIDA ADMINISTRATIVE CODE, AND NASD CONDUCT RULE 2110 AND FINRA CONDUCT RULE 2010.
Current Status:	Final
Resolution:	Order
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	01/30/2013
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Restitution
Monetary Sanction 1 of 2	
Monetary Related Sanction:	Restitution
Total Amount:	\$100,000.00
Portion Levied against individual:	\$100,000.00
Payment Plan:	NONE
Is Payment Plan Current:	No
Date Paid by individual:	
Was any portion of penalty waived?	No



Amount Waived:

Monetary Sanction 2 of 2

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$70,000.00

Portion Levied against individual: \$70,000.00

Payment Plan: NONE

Is Payment Plan Current: No

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:



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 4

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	SPIRE SECURITIES, LLC
Allegations:	Unsuitable investment recommendation. Client invested a total of 300000 during 2020 and 2021 in GWG L-Bonds.
Product Type:	Other: L - Bonds
Alleged Damages:	\$500,000.00
Is this an oral complaint?	No
Is this a written complaint?	Yes
Is this an arbitration/CFTC reparation or civil litigation?	Yes
Arbitration/Reparation forum or court name and location:	FINRA
Docket/Case #:	Case ID: 22-01340
Filing date of arbitration/CFTC reparation or civil litigation:	06/15/2022

Customer Complaint Information

Date Complaint Received:	06/21/2022
Complaint Pending?	No
Status:	Settled
Status Date:	03/30/2023
Settlement Amount:	\$143,000.00
Individual Contribution Amount:	\$123,851.00

Disclosure 2 of 4



Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: ASSET & FINANCIAL PLANNING, LTD

Allegations: INVESTMENT ADVISORY FEES CAUSED A PARTIAL LOSS OF LIVING BENEFIT RIDER

Product Type: Annuity-Variable

Alleged Damages: \$71,873.00

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: 06/25/2009

Complaint Pending? No

Status: Settled

Status Date: 10/09/2009

Settlement Amount: \$6,447.68

Individual Contribution Amount: \$1,692.51

Broker Statement RESTORATION OF LIVING BENEFITS RESTORED TO ANNUITY CONTRACTS.

Disclosure 3 of 4

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: PRIME CAPITAL SERVICES

Allegations: UNSUITABLE RECOMENDATION OF PROMISARY NOTES WHICH IS AN UNREGISTERED SECURITY

Product Type: Other

Alleged Damages: \$75,000.00



Customer Complaint Information

Date Complaint Received: 02/14/2005

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 02/14/2005

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD 05-00653

Date Notice/Process Served: 02/14/2005

Arbitration Pending? No

Disposition: Settled

Disposition Date: 04/03/2006

Monetary Compensation Amount: \$117,000.00

Individual Contribution Amount: \$117,000.00

Disclosure 4 of 4

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: PRIME CAPITAL SERVICES, INC.

Allegations: SALE OF PROMISSORY NOTES, UNREGISTERED SECURITIES WERE UNSUITABLE INVESTMENTS.

Product Type: Other

Alleged Damages: \$177,224.65

Customer Complaint Information

Date Complaint Received: 09/27/2004



Complaint Pending? No
Status: Arbitration/Reparation
Status Date: 09/27/2004

Settlement Amount:
Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD #04-06612

Date Notice/Process Served: 09/27/2004

Arbitration Pending? No

Disposition: Settled

Disposition Date: 10/06/2006

Monetary Compensation Amount: \$130,000.00

Individual Contribution Amount: \$97,000.00



Customer Dispute - Closed-No Action / Withdrawn / Dismissed / Denied

This type of disclosure event involves (1) a consumer-initiated, investment-related arbitration or civil suit containing allegations of sales practice violations against the individual broker that was dismissed, withdrawn, or denied; or (2) a consumer-initiated, investment-related written complaint containing allegations that the broker engaged in sales practice violations resulting in compensatory damages of at least \$5,000, forgery, theft, or misappropriation, or conversion of funds or securities, which was closed without action, withdrawn, or denied.

Disclosure 1 of 7

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: PRIME CAPITAL SERVICES, INC.

Allegations: THE CLIENT IS ALLEDGING A MISREPRESENTATION OF THE PERFORMANCE, SURRENDER CHARGES AND FEES ASSOCIATED WITH THE PURCHASE OF A VARIABLE ANNUITY IN 2004.

Product Type: Annuity-Variable

Alleged Damages: \$13,595.29

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: 09/11/2007

Complaint Pending? No

Status: Denied

Status Date: 03/20/2008

Settlement Amount:

Individual Contribution Amount:

Disclosure 2 of 7

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: PRIME CAPITAL SERVICES, INC.



Allegations: THE CLIENT IS UPSET WITH A DISTRIBUTION THEY RECEIVED FROM TEXTAINER V THAT WAS PURCHASED IN 1998.

Product Type: Direct Investment(s) - DPP & LP Interest(s)

Alleged Damages: \$10,000.00

Customer Complaint Information

Date Complaint Received: 05/31/2005

Complaint Pending? No

Status: Denied

Status Date: 07/13/2005

Settlement Amount:

Individual Contribution Amount:

Broker Statement THE CLIENT WAS GIVEN A FULL PROSPECTUS AND THE PROGRAM WAS REVIEWED WITH THEM.

Disclosure 3 of 7

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: PRIME CAPITAL SERVICES, INC.

Allegations: VARIABLE ANNUITY PURCHASED IN 1999. INITIAL COMPLAINT TO NASD IN 2001 DUE TO MARKET LOSS. CUSTOMER'S CURRENT COMPLAINT LETTER WAS WRITTEN TO THE ISSUING INSURANCE COMPANY CLAIMING INVESTMENT LOSS AND HIGH FEES

Product Type: Annuity(ies) - Variable

Alleged Damages: \$7,612.00

Customer Complaint Information

Date Complaint Received: 10/15/2004

Complaint Pending? No

Status: Denied

Status Date: 12/02/2004

Settlement Amount:

**Individual Contribution Amount:****Disclosure 4 of 7**

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: PRIME CAPITAL SERVICES

Allegations: UNSUITABILITY AND FAILURE TO DISCLOSE ASSOCIATED WITH THE PURCHASE OF TWO VARIABLE ANNUITY CONTRACTS PURCHASED IN 4/03

Product Type: Annuity(ies) - Variable

Alleged Damages: \$130,000.00

Customer Complaint Information

Date Complaint Received: 11/19/2004

Complaint Pending? No

Status: Denied

Status Date: 01/13/2005

Settlement Amount:

Individual Contribution Amount:**Disclosure 5 of 7**

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: PRIME CAPITAL SERVICES, INC.

Allegations: CLIENTS CLAIM THAT THEY SUFFERED LOSSES DUE TO UNSUITABLE INVESTMENTS IN THEIR VARIABLE ANNUITY ACCOUNTS.

Product Type: Annuity(ies) - Variable

Alleged Damages: \$60,000.00

Customer Complaint Information

Date Complaint Received: 07/26/2004



Complaint Pending? No

Status: Withdrawn

Status Date: 01/07/2005

Settlement Amount:

Individual Contribution Amount:

Disclosure 6 of 7

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: PRIME CAPITAL SERVICES, INC.

Allegations: CLIENT CLAIMS WRONG S/C DISCLOSED.

Product Type: Annuity(ies) - Variable

Alleged Damages: \$6,100.00

Customer Complaint Information

Date Complaint Received: 08/05/2003

Complaint Pending? No

Status: Closed/No Action

Status Date: 01/11/2004

Settlement Amount:

Individual Contribution Amount:

Broker Statement

CLIENT WAS ADVISED NOT TO SURRENDER THE CONTRACTS AS IT WOULD NOT BE IN HIS BEST INTEREST. CONTRACTS WERE HELD FOR 1 YEAR AND VALUE WAS UP FROM HIS INITIAL INVESTMENT. CLIENT WANTED A 10% BONUS IN A NEW CONTRACT ELSEWHERE. CLIENT KNEW HE WOULD LOSE THE CREDIT IN HIS EXISTING CONTRACTS IF SURRENDERED AND HE KNEW THERE WOULD ALSO BE A CDSC IF SURRENDERED. HE IS DENYING EVER BEING TOLD ABOUT CDSC YET HE SIGNED THE FORM OUTLINING THIS CHARGE. THE DIFFERENCE BETWEEN WHAT THE CLIENT RECEIVED AFTER SURRENDERING HIS CONTRACTS AND HIS INITIAL INVESTMENT WAS \$3,390.15.



Disclosure 7 of 7

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	PRIME CAPITAL SERVICES
Allegations:	CLIENT ALLEGES MISREPRESENTATION WITH REGARD TO THE MANAGEMENT OF HIS VARIABLE ANNUITY PURCHASED IN NOVEMBER 2001
Product Type:	Annuity(ies) - Variable
Alleged Damages:	\$65,517.00

Customer Complaint Information

Date Complaint Received:	07/31/2002
Complaint Pending?	No
Status:	Denied
Status Date:	09/19/2002
Settlement Amount:	
Individual Contribution Amount:	



Customer Dispute - Pending

This type of disclosure event involves (1) a pending consumer-initiated, investment-related arbitration or civil suit that contains allegations of sales practice violations against the broker; or (2) a pending, consumer-initiated, investment-related written complaint containing allegations that the broker engaged in, sales practice violations resulting in compensatory damages of at least \$5,000, forgery, theft, or misappropriation, or conversion of funds or securities.

Disclosure 1 of 1

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	SAGEPOINT FINANCIAL, INC; INVESTORS CAPITAL CORP; SPIRE SECURITIES
Allegations:	CLAIMANT ALLEGES THAT HE WAS GIVEN POOR ADVICE REGARDING WITHDRAWALS FROM AN ANNUITY AND THAT ALTERNATIVE INVESTMENTS WERE RECOMMENDED THAT DID NOT MEET THE CLIENT'S NEEDS AND OBJECTIVES.
Product Type:	Annuity-Variable Direct Investment-DPP & LP Interests
Alleged Damages:	\$300,000.00
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, FLORIDA
Docket/Case #:	21-01585
Filing date of arbitration/CFTC reparation or civil litigation:	06/22/2021

Customer Complaint Information

Date Complaint Received:	06/22/2021
Complaint Pending?	Yes
Settlement Amount:	
Individual Contribution Amount:	



Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: SAGEPOINT FINANCIAL, INC., Investors Capital Corp.

Allegations: Claimant alleges that he ws given poor advice regarding withdrawals from an annuity and that alternative investments were recommended that did not meet the client's needs and objectives.

Product Type: Annuity-Variable
Direct Investment-DPP & LP Interests

Alleged Damages: \$300,000.00

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, Florida

Docket/Case #: 21-01585

Filing date of arbitration/CFTC reparation or civil litigation: 06/22/2021

Customer Complaint Information

Date Complaint Received: 06/29/2021

Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:

Broker Statement I totally disagree with the accusations made in the complaint filed by [REDACTED]. These accusations are false and misleading.



Financial - Final

This type of disclosure event involves a 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:	Compromise
Action Date:	06/26/2015
Organization Investment-Related?	
Type of Court:	N/A
Name of Court:	N/A
Location of Court:	N/A
Docket/Case #:	N/A
Action Pending?	No
Disposition:	Satisfied/Released
Disposition Date:	07/21/2015
If a compromise with creditor, provide:	
Name of Creditor:	BANK OF AMERICA CREDIT CARD
Original Amount Owed:	\$18,101.24
Terms Reached with Creditor:	SETTLED FOR \$7500.00 ON 7/21/2015

Broker Statement	COMPROMISE REGARDING CREDIT CARD WITH BANK OF AMERICA. BANK WAS CHARGING 39% INTEREST AND NOT WILLING TO CHANGE SO I STOPPED PAYING UNTIL THEY AGREED TO A PAYOFF TO SETTLE CARD SO I MADE AN OFFER OF \$7500 AND THEY ACCEPTED.
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Judgment / Lien

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

Disclosure 1 of 8

Reporting Source:	Broker
Judgment/Lien Holder:	Internal Revenue Service
Judgment/Lien Amount:	\$365,405.75
Judgment/Lien Type:	Tax
Date Filed with Court:	09/22/2022
Date Individual Learned:	09/23/2022
Type of Court:	Sarasota County, FL
Name of Court:	Sarasota Clerk of the Circuit Court
Location of Court:	Sarasota, Florida
Docket/Case #:	2022152848
Judgment/Lien Outstanding?	Yes

Disclosure 2 of 8

Reporting Source:	Broker
Judgment/Lien Holder:	IRS
Judgment/Lien Amount:	\$41,256.99
Judgment/Lien Type:	Tax
Date Filed with Court:	02/08/2022
Date Individual Learned:	02/25/2022
Type of Court:	Federal Court
Name of Court:	Internal Revenue Service
Location of Court:	Sarasota, FL
Judgment/Lien Outstanding?	Yes

Disclosure 3 of 8

Reporting Source:	Broker
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Judgment/Lien Holder: Internal Revenue Services

Judgment/Lien Amount: \$69,213.65

Judgment/Lien Type: Tax

Date Filed with Court: 11/29/2019

Date Individual Learned: 12/09/2019

Type of Court: State Court

Name of Court: Sarasota Clerk of Circuit Court

Location of Court: Sarasota, FL

Docket/Case #: 2019151977

Judgment/Lien Outstanding? Yes

Broker Statement I had previously disclosed all liens I was aware of when joining Spire in October 2016. My understanding is that this particular lien had been rolled into the present one, which I have previously disclosed. This is not a separate matter. All of these liens/hardships were caused by the criminal activities of a now defunct broker-dealer. (Prime Capital Services) Court dates are set for July 2020 to settle all existing matters.

Disclosure 4 of 8

Reporting Source: Broker

Judgment/Lien Holder: IRS

Judgment/Lien Amount: \$131,643.66

Judgment/Lien Type: Tax

Date Filed with Court: 08/01/2016

Date Individual Learned: 11/08/2018

Type of Court: State Court

Name of Court: Sarasota County, Florida

Location of Court: Sarasota County, Florida

Docket/Case #: 2016094854

Judgment/Lien Outstanding? Yes

Broker Statement I first learned of this lien when notified by my broker-dealer in November of 2018. I had previously disclosed all liens I was aware of when joining Spire of October



2016. My understanding was that this particular lien had been rolled into the present one, which I have previously disclosed. All of these liens/hardships were caused by the criminal activities of a now defunct broker-dealer. (Prime Capital Services) Court dates are set for July 2020 to settle all existing matters. The Disclosure Letter dated 11/29/2019 (Case# 2019151977, \$69,213.65) is not a separate matter. It is a continuance of the existing matter.

Disclosure 5 of 8

Reporting Source: Broker

Judgment/Lien Holder: Internal Revenue Service

Judgment/Lien Amount: \$98,076.54

Judgment/Lien Type: Tax

Date Filed with Court: 07/11/2018

Date Individual Learned: 08/01/2018

Type of Court: Circuit Court

Name of Court: Sarasota Cleark of Circuit Court

Location of Court: Sarasota County, Sarasota, FL

Docket/Case #: 315232518

Judgment/Lien Outstanding? Yes

Broker Statement Continuing fallout from the theft by Price Capital Services. Severe family illness and the resulting medical bills incurred over the past 12 months. Currently engaged in lawsuit against former BD that has caused this event. We are in the deposition stage and this matter should be resolved in the next 6 to 12 months

Disclosure 6 of 8

Reporting Source: Broker

Judgment/Lien Holder: IRS

Judgment/Lien Amount: \$45,287.37

Judgment/Lien Type: Tax

Date Filed with Court: 07/10/2013

Type of Court: IRS

Name of Court: UNKNOWN



Location of Court: UNKNOWN

Judgment/Lien Outstanding? Yes

Broker Statement (IRS LIEN) CAUSED BY PRIME CAPITOL-AFP ILLEGALLY WITHHOLDING FUNDS OF OVER 700,000 OWED TO ME AND MY FIRM, WILL BE RESOLVED IN AN ACTION AGAINST PRIME CAPITAL SERVICES IN THE NEAR FUTURE.

Disclosure 7 of 8

Reporting Source: Broker

Judgment/Lien Holder: DEPARTMENT OF THE TREASURY - INTERNAL REVENUE SERVICE

Judgment/Lien Amount: \$203,045.95

Judgment/Lien Type: Tax

Date Filed with Court: 09/17/2012

Type of Court: CIRCUIT COURT

Name of Court: SARASOTA CLERK OF CIRCUIT COURT

Location of Court: SARASOTA COUNTY

Docket/Case #: 887344712

Judgment/Lien Outstanding? Yes

Disclosure 8 of 8

Reporting Source: Broker

Judgment/Lien Holder: DEPARTMENT OF THE TREASURY - INTERNAL REVENUE SERVICE

Judgment/Lien Amount: \$88,850.31

Judgment/Lien Type: Tax

Date Filed with Court: 09/17/2012

Type of Court: CIRCUIT COURT

Name of Court: SARASOTA CLERK OF CIRCUIT COURT

Location of Court: SARASOTA

Docket/Case #: 888955912

Judgment/Lien Outstanding? Yes

End of Report



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