

BrokerCheck Report

DAWN BENNETT

CRD# 1567051

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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.

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

DAWN BENNETT

CRD# 1567051

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:

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

Registration History

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

WESTERN INTERNATIONAL SECURITIES, INC.
CRD# 39262
WASHINGTON DC, DC
10/2009 - 12/2015

ROYAL ALLIANCE ASSOCIATES, INC.
CRD# 23131
WASHINGTON, DC
02/2006 - 10/2009

CITIGROUP GLOBAL MARKETS INC.
CRD# 7059
NEW YORK, NY
02/2006 - 02/2006

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	3
Criminal	1
Civil Event	1
Customer Dispute	27
Termination	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 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.

This individual has passed 0 principal/supervisory exams, 2 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
Securities Industry Essentials Examination	SIE	12/01/2015
General Securities Representative Examination	Series 7	12/20/1986

State Securities Law Exams

Exam	Category	Date
Uniform Investment Adviser Law Examination	Series 65	07/25/1997
Uniform Securities Agent State Law Examination	Series 63	10/03/1986

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
10/2009 - 12/2015	WESTERN INTERNATIONAL SECURITIES, INC.	39262	WASHINGTON DC, DC
02/2006 - 10/2009	ROYAL ALLIANCE ASSOCIATES, INC.	23131	WASHINGTON, DC
02/2006 - 02/2006	CITIGROUP GLOBAL MARKETS INC.	7059	NEW YORK, NY
08/1996 - 02/2006	LEGG MASON WOOD WALKER, INCORPORATED	6555	BALTIMORE, MD
03/1987 - 08/1996	WHEAT, FIRST SECURITIES, INC.	6124	CHARLOTTE, NC

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
10/2009 - Present	WESTERN INTERNATIONAL SECURITIES	WASHINGTON DC, DC
10/2006 - Present	BENNETT GROUP FINANCIAL SERVICES, LLC	WASHINGTON, DC
02/2006 - 10/2009	ROYAL ALLIANCE ASSOCIATES	WASHINGTON, DC

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.

BENNETT GROUP INC.; 5610 WISCONSIN AVE, CHEVY CHASE, MD 20818; INVESTMENT RELATED; SOLE PROPRIETOR AND OWNER

BG MEDIA PRODUCTIONS; CHEVY CHASE, MD;
NON-INVESTMENT RELATED; OWNING RIGHTS TO TV SHOWS, BOOKS WRITTEN, AND PERSONAL RADIO SHOWS; OWNS A MINIMUM OF 95% OF THE COMPANY, 5% OWNED BY OTHERS; 10/01/05; 5-10 HRS PER WK;

Registration and Employment History



Other Business Activities, continued

NONE

DJB HOLDING LLC; NON-INVESTMENT RELATED; HOLDING COMPANY FOR CLOTHING LINE
05/01/2013-PRESENT; NIR; GENERAL AGENT; FIXED ANNUITIES; 5/5/HRS/MO
08/2013-PRESENT; IR; PRECIOUS METALS TRADING; FIDELITRADE, INC. 4/4/HRS/MO; 2601 N MARKET ST
WILMINGTON DE; PYTHIA, OWNER, NOT INVESTMENT RELATED 5335 WISCONSIN AVE.NW WASHINGTON DC.
1 HR/MO BEHAVIORAL TESTING SOFTWARE

THEY'RE JUST KIDS FOUNDATION; NON-INVESTMENT RELATED; BOARD MEMBER



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
Regulatory Event	1	2	0



Criminal	1	0	0
Civil Event	1	0	0
Customer Dispute	11	16	N/A
Termination	N/A	1	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:	Suspension
Date Initiated:	03/25/2016
Docket/Case Number:	2015047682401
Employing firm when activity occurred which led to the regulatory action:	N/A
Product Type:	No Product
Allegations:	Respondent Bennett failed to respond to FINRA request for information.
Current Status:	Final
Resolution:	Letter



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: 08/02/2016

Sanctions Ordered: 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:	N/A
Start Date:	08/02/2016
End Date:	08/16/2016

**Regulator Statement**

Pursuant to FINRA Rule 8210 and in accordance with FINRA's Notice of Suspension letter dated March 25, 2016, Bennett is suspended on August 2, 2016 from associating with any FINRA member firm in any capacity. If Bennett does not comply fully with FINRA's 8210 request letters within 10 business days after this decision, she will automatically be barred on August 16, 2016 from association with any FINRA member in any capacity.

Suspension lifted on August 16, 2016.

Disclosure 2 of 2

Reporting Source:	Regulator
Regulatory Action Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Sanction(s) Sought:	Other: n/a
Date Initiated:	09/09/2015
Docket/Case Number:	3-16801
Employing firm when activity occurred which led to the regulatory action:	Bennett Group Financial Services, LLC
Product Type:	No Product
Allegations:	SEC Admin Release 33-9910/34-75864/IA Release 4191/Investment Company Act Release 31810/September 9, 2015: 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), Sections 15(b) and 21C of the Securities Exchange Act of 1934 (Exchange Act), Sections 203(e), 203(f), and 203(k) of the Investment Advisers Act of 1940 (Advisers Act), and Section 9(b) of the Investment Company Act of 1940 (Investment Company Act) against Dawn J. Bennett. From at least 2009 through February 2011, a firm and its founder, majority owner, and CEO, Bennett, made material misstatements and omissions regarding assets that were purportedly "managed" for investors and regarding investment returns for the purpose of retaining existing customers and attracting new customers. Then, during the investigation of this matter, Bennett and the firm made additional misstatements in an effort to obstruct the investigation and to "cover up" their prior fraud. In short, Bennett and the firm grossly overstated the amount of assets they "managed," by at least \$1.5 billion, in a calculated effort to inflate their profile and prestige. They made the false and fraudulent claims to a national financial advisor ranking service knowing that the ranking service would publish the misstatements. They also made the



misstatements on a Washington, D.C.-area radio program hosted by Bennett, and in a variety of other advertisements and communications with existing and prospective customers and clients. The purpose of these overstatements was to create the impression that Bennett and her firm were larger and more successful players in the industry than they were. Bennett and the firm also made material misstatements and omissions during the radio show regarding the firm's investment returns and performance. Bennett frequently touted her firm's highly profitable investment returns and claimed that those returns placed the firm in the "top 1%" of firms worldwide. In violation of her legal disclosure duties and specific advice she received, Bennett failed to disclose that the purported "returns" were simply those of a "model portfolio" and did not reflect actual customer returns. In addition to the material misstatements and omissions about these matters, Bennett and the firm failed to adopt and to implement adequate written policies and procedures related to the calculation and advertisement of assets managed and of investment returns. During the investigation of this matter, in order to substantiate their prior fraudulent claims regarding assets managed and to obstruct this investigation, Bennett and the firm made additional false statements. They falsely asserted that they gave advice regarding short-term cash management to three corporate clients regarding over \$1.5 billion in corporate assets. In reality, they never provided the advice, and these were simply lies meant to deceive the Division of Enforcement. Bennett and the firm never provided any form of management for assets in excess of approximately \$407 million. As a result of the conduct described above, Bennett willfully violated Section 17(a) of the Securities Act and Section 10(b) of the Exchange Act and Rule 10b-5 thereunder and Sections 206(1) and 206(2) of the Advisers Act. Bennett willfully aided and abetted and caused the firm's violations of, Section 206(4) of the Advisers Act and Rules 206(4)-1(a)(5) and 206(4)-7 thereunder.

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?	Yes
Resolution Date:	03/30/2017
Sanctions Ordered:	Bar (Permanent) Cease and Desist Civil and Administrative Penalty(ies)/Fine(s) Disgorgement Prohibition



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?

Yes

(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?

Yes

(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

No



(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?

No

Sanction 1 of 2

Sanction Type:

Bar (Permanent)

Capacities Affected:

participating in an offering of penny stock

Duration:

Start Date:

03/30/2017

End Date:

Sanction 2 of 2

Sanction Type:

Bar (Permanent)

Capacities Affected:

any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or NRSRO

Duration:

Start Date:

03/30/2017

End Date:

Monetary Sanction 1 of 2

Monetary Related Sanction:

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

Total Amount:

\$600,000.00

Portion Levied against individual:

\$600,000.00

**Payment Plan:****Is Payment Plan Current:****Date Paid by individual:****Was any portion of penalty waived?** No**Amount Waived:****Monetary Sanction 2 of 2****Monetary Related Sanction:** Disgorgement**Total Amount:** \$556,102.00**Portion Levied against individual:** \$556,102.00**Payment Plan:** jointly and severally / plus prejudgment interest**Is Payment Plan Current:****Date Paid by individual:****Was any portion of penalty waived?** No**Amount Waived:****Regulator Statement**

SEC INITIAL DECISION RELEASE 1033, July 11, 2016:

Dawn J. Bennett willfully violated Section 17(a) of the Securities Act of 1933, Section 10(b) of the Securities Exchange Act of 1934, Exchange Act Rule 10b-5, and Section 206(1) and (2) of the Investment Advisers Act of 1940.

Bennett willfully aided and abetted and caused the violations of, Section 206(4) of the Advisers Act and Advisers Act Rules 206(4)-1(a)(5) and 206(4)-7.

Dawn J. Bennett is BARRED from associating with a broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization.

Bennett is further BARRED from participating in an offering of penny stock, including acting as a promoter, finder, consultant, agent, or other person who engages in activities with a broker, dealer, or issuer for purposes of the issuance of trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock.

Bennett is PERMANENTLY PROHIBITED from serving or acting as an employee, officer, director, member of an advisory board, investment adviser or depositor of, or principal underwriter for, a registered investment company or affiliated person of such investment adviser, depositor, or principal underwriter.

Bennett shall CEASE AND DESIST from committing or causing any violations or



future violations of Section 17(a) of the Securities Act of 1933, Section 10(b) of the Securities Exchange Act of 1934, and Rule 10b-5 thereunder, and Sections 206(1), 206(2), and 206(4) of the Investment Advisers Act of 1940, and Rules 206(4)-1(a)(5) and 206(4)-7 thereunder.

Bennett is ordered to pay disgorgement of \$556,102, jointly and severally, plus prejudgment interest, and pay a civil penalty of \$600,000.

This initial decision will not become final until the Commission enters an order of finality.

SEC Admin Releases 33-10331; 34- 80347; IA Release 4676; Investment Company Act Release 32586 / March 30, 2017 - Opinion of the commission -, Appeal filed on August 2, 2016: On the basis of the Commission's opinion issued this day, it is ordered that Bennett be barred from association with a broker, dealer, investment adviser, municipal securities dealer, transfer agent, municipal advisor or nationally recognized statistical rating organization (NRSRO) or from participating in an offering of penny stock; permanently prohibited from serving or acting as an employee, officer, director, member of an advisory board, investment adviser or depositor of, or principal underwriter for, a registered investment company or affiliated person of such investment adviser, depositor, or principal underwriter; is to cease and desist from committing or causing violations of or any future violations of Section 17(a) of the Securities Act; Section 10(b) of the Exchange Act and Rule 10b-5 thereunder; and Sections 206(1), 206(2), and 206(4) of the Advisers Act and Rules 206(4)-1(a)(5) and 206(4)-7 thereunder; disgorge, jointly and severally, \$556,102 plus prejudgment interest; and pay a civil money penalty of \$600,000.

Reporting Source:	Broker
Regulatory Action Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Sanction(s) Sought:	Other: N/A
Date Initiated:	09/09/2015
Docket/Case Number:	3-16801
Employing firm when activity occurred which led to the regulatory action:	BENNETT GROUP FINANCIAL SERVICES, LLC
Product Type:	No Product
Allegations:	OVERSTATED FIRM'S ASSETS UNDER MANAGEMENT AND INVESTMENT RETURNS
Current Status:	Pending



Broker Statement

Bennett Group Financial Services ("BGFS") and Dawn Bennett, despite facts to the contrary, were recently charged by the SEC with misrepresenting the amount of "assets under management" and the results of their investment model used to make recommendations to their brokerage clients. The reputed misstatements are said to have occurred almost five years ago in statements made on Ms. Bennett's syndicated radio show, "Financial Mythbusting," in which Ms. Bennett and her guests debate government economic policies, and in a publication in 2009 and 2011.

Critically, despite over four years of investigation, the SEC did not charge that customers of BGFS lost money due to any misconduct on the part of Ms. Bennett or BGFS.

Ms. Bennett and her colleagues at BGFS have acted with integrity in building their company. Their business model is based on the integrity of the markets and the need for financial advisors to abide by conduct consistent with just and equitable principles of trade. Litigation will demonstrate that the SEC's allegations against Bennett and her firm are without merit.

Consequently, Ms. Bennett denies all allegations of any wrongdoing. She will vigorously defend this case at the earliest possible moment, but in the proper forum. When all facts come to light, not just those the SEC chooses to focus on, Ms. Bennett anticipates she will be completely vindicated.



Regulatory - Pending

This type of disclosure event involves a pending formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory agency such as the Securities and Exchange Commission, foreign financial regulatory body) for alleged violations of investment-related rules or regulations.

Disclosure 1 of 1

Reporting Source: Regulator

Regulatory Action Initiated By: FINRA

Sanction(s) Sought:

Date Initiated: 11/09/2016

Docket/Case Number: [2015047682402](#)

Employing firm when activity occurred which led to the regulatory action:

Product Type: No Product

Allegations: Bennett was named a respondent in a FINRA complaint alleging that she has failed to provide information and documentation requested by FINRA in an investigation involving potentially serious violations, such as conversion, fraud, and private securities transactions. The complaint alleges that on four separate occasions, Bennett failed to appear and provide testimony requested by FINRA.

Current Status: Pending



Criminal - Pending Charge

This type of disclosure event involves a formal charge for a crime involving a felony or certain misdemeanor offenses, including bribery, perjury, forgery, counterfeiting, extortion, fraud, and wrongful taking of property that is currently pending.

Disclosure 1 of 1

Reporting Source:	Regulator
Formal Charges were brought in:	Federal Court
Name of Court:	United States District Court for the District of Maryland
Location of Court:	Greenbelt, MD
Docket/Case #:	8:17mj2292
Charge Date:	08/28/2017
Charge(s) 1 of 3	
Formal Charge(s)/Description:	Wire Fraud
No of Counts:	1
Felony or Misdemeanor:	Felony
Plea for each charge:	NOT PROVIDED
Disposition of charge:	
Charge(s) 2 of 3	
Formal Charge(s)/Description:	False Statements in Relation to Loan and Credit Application
No of Counts:	1
Felony or Misdemeanor:	Felony
Plea for each charge:	NOT PROVIDED
Disposition of charge:	
Charge(s) 3 of 3	
Formal Charge(s)/Description:	Bank Fraud
No of Counts:	1
Felony or Misdemeanor:	Felony
Plea for each charge:	NOT PROVIDED



Disposition of charge:

Current Status:

Pending

Status Date:

08/28/2017



Civil - Pending

This type of disclosure event involves a pending civil court action that seeks an injunction in connection with any investment-related activity or alleges a violation of any investment-related statute or regulation.

Disclosure 1 of 1

Reporting Source:	Regulator
Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Relief Sought:	Civil and Administrative Penalty(ies)/Fine(s) Disgorgement Injunction Monetary Penalty other than Fines
Date Court Action Filed:	08/25/2017
Product Type:	Promissory Note
Type of Court:	Federal Court
Name of Court:	United States District Court for the District of Maryland
Location of Court:	Greenbelt, MD
Docket/Case #:	8:17cv2453
Employing firm when activity occurred which led to the action:	DJB Holdings, LLC
Allegations:	<p>Litigation Release No. 23922 / August 28, 2017:</p> <p>The Securities and Exchange Commission ("Commission") alleges that this matter involves an offering fraud orchestrated by Defendant Dawn J. Bennett ("Bennett"), founder and owner of Defendant DJB Holdings, LLC ("DJBennett"), a Washington D.C.- based retail sports apparel business.</p> <p>From December 2014 through at least July 2017, Defendants raised more than \$20 million from at least 46 investors through the unregistered offering of DJBennett convertible and promissory notes (collectively, the "Notes") by making materially false and misleading statements and omissions concerning, among other things, DJBennett's financial condition and operating performance, the risks associated with the investment, and the intended use of investor proceeds. Bennett, a former registered representative associated with Broker Dealer 1, and former radio host of "Financial Myth Busting with Dawn Bennett," for years operated a financial advisory business. By the outset of the fraud, however, Bennett had lost a significant portion of her financial advisory clientele and DJBennett was not profitable. As her financial condition rapidly deteriorated, Bennett began accumulating a variety of personal financial obligations, but nonetheless continued to spend considerable sums to fund her extravagant life</p>



style.

To finance DJBennett, Bennett turned to the fraudulent sale of the Notes. Bennett largely targeted elderly and financially unsophisticated investors by materially misrepresenting the company's profitability and by claiming the company had the resources to pay annual rates of return as high as 15%. Bennett also lied about DJBennett's extensive liabilities and the risks associated with the investment.

Although Bennett claimed the funds would be used for corporate purposes, she used the proceeds for a variety of improper purposes, including payments to earlier investors in the nature of Ponzi scheme, to service debt, and a variety of luxuries, such as jewelry, high-end clothing, mystics, and a \$500,000 annual lease for a luxury suite at AT&T Stadium in Dallas.

Bennett also employed a variety of other fraudulent devices to further the scheme and to avoid detection. Among other things, Bennett lied to Broker Dealer 1 and a regulator about her ongoing note sales; fraudulently obtained several loans by submitting fabricated brokerage statements that inflated her net worth and then used the proceeds, in part, to make interest and redemption payments; and replaced previously sold convertible notes with nine-month promissory notes in an apparent attempt to have the promissory notes deemed loans.

As a result of the conduct described, Defendants violated, and unless restrained and enjoined will continue to violate, Sections 5(a), 5(c), and 17(a) of the Securities Act of 1933 ("Securities Act") and Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act") and Rule 10b-5 thereunder.

Current Status:

Pending

Limitations or Restrictions in Effect During Appeal:

n/a



Customer Dispute - Award / Judgment

This type of disclosure event involves a final, consumer-initiated, investment-related arbitration or civil suit containing allegations of sales practice violations against the broker that resulted in an arbitration award or civil judgment for the customer.

Disclosure 1 of 3

Reporting Source:	Regulator
Employing firm when activities occurred which led to the complaint:	Western International Securities, Inc.
Allegations:	breach of the general duties of reasonable care, honesty and disclosure; recommending unsuitable investments in violation of Fla. Stat. Section 517.301; common law fraud; breach of fiduciary duty; negligence
Product Type:	Other: exchange traded fund
Alleged Damages:	\$850,000.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: [FINRA - CASE #14-00575](#)

Date Notice/Process Served:	02/21/2014
Arbitration Pending?	No
Disposition:	Award
Disposition Date:	03/21/2017
Disposition Detail:	Bennett is jointly and severally liable for violations of Fla. Stat Section 517.301 including, but not limited to, recommending unsuitable investments and shall pay to Claimant the sum of \$763,740 in compensatory damages. Bennett is also jointly and severally liable for and shall pay to Claimant interest on the above-stated sum at the Florida statutory rate from the date of the Award until it is paid in full.

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	WESTERN INTERNATIONAL SECURITIES, INC.
Allegations:	DESPITE HIS APPROVAL FOR ALL TRANSACTIONS, CLAIMANT ALLEGED THAT CERTAIN TRANSACTIONS VIOLATED A BREACH OF DUTY, AND NEGLIGENCE IN HIS ACCOUNT DURING THE PERIOD MAY 2010 THROUGH



NOVEMBER 2013. THE RECORDS REFLECT THE CUSTOMER AUTHORIZED THE TRANSACTIONS. THE ALLEGATIONS ARE WITHOUT MERIT AND DENY THE ALLEGATIONS.

Product Type: Debt-Government
Equity Listed (Common & Preferred Stock)

Alleged Damages: \$850,000.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA

Docket/Case #: 14-00575

Date Notice/Process Served: 04/04/2014

Arbitration Pending? Yes

Disclosure 2 of 3

Reporting Source: Regulator

Employing firm when activities occurred which led to the complaint: WESTERN INTERNATIONAL SECURITIES, INC. AND ROYAL ALLIANCE ASSOCIATES, INC.

Allegations: CHURNING; MISREPRESENTATION; OMISSION OF FACTS; ACTUAL FRAUD; BREACH OF FIDUCIARY DUTY; CONSTRUCTIVE FRAUD; BREACH OF CONTRACT; NEGLIGENCE; UNSUITABILITY; AND A VIOLATION OF THE VIRGINIA SECURITIES ACT.

Product Type: Other: UNSPECIFIED SECURITIES

Alleged Damages: \$0.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: [FINRA - CASE #13-00612](#)

Date Notice/Process Served: 02/26/2013

Arbitration Pending? No

Disposition: Award

Disposition Date: 10/21/2014



Disposition Detail: RESPONDENT DAWN BENNETT IS JOINTLY AND SEVERALLY LIABLE AND SHALL PAY CLAIMANT THE SUM OF \$100,000.00 IN COMPENSATORY DAMAGES. RESPONDENT IS JOINTLY AND SEVERALLY LIABLE AND SHALL PAY TO CLAIMANT INTEREST ON THE COMPENSATORY DAMAGES AWARDED.

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: ROYAL ALLIANCE ASSOCIATES, INC.

Allegations: THE CUSTOMER ALLEGES THAT EXCESSIVE TRADING AND IMPROPER USE OF MARGIN CAUSED LOSSES IN HER BROKERAGE ACCOUNTS.

Product Type: Debt-Asset Backed
Debt-Corporate
Debt-Government
Debt-Municipal
Mutual Fund

Alleged Damages: \$1,625,760.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA

Docket/Case #: [13-00612](#)

Date Notice/Process Served: 03/15/2013

Arbitration Pending? No

Disposition: Award to Customer

Disposition Date: 10/21/2014

Monetary Compensation Amount: \$100,000.00

Individual Contribution Amount: \$0.00

Reporting Source: Broker



Employing firm when activities occurred which led to the complaint:	WESTERN INTERNATIONAL SECURITIES, INC.
Allegations:	FOLLOWING A RELATIONSHIP OVER FIFTEEN YEARS, CLIENT, A NON-PRACTICING ATTORNEY, FILED A CLAIM ALLEGING THAT, DESPITE HER APPROVAL ON ALL TRANSACTIONS IN HER ACCOUNTS DURING THE PERIOD 2006-2012, CERTAIN TRANSACTIONS VIOLATED A DUTY OWED TO HER. THE RECORDS SHOW THE CLIENT AUTHORIZED THE TRANSACTIONS IN THE NON-DISCRETIONARY ACCOUNTS. WE BELIEVE THE ALLEGATIONS ARE WITHOUT MERIT AND DENY THE CLAIM IN ITS ENTIRETY.
Product Type:	Debt-Government Equity Listed (Common & Preferred Stock)
Alleged Damages:	\$1,625,760.00
Arbitration Information	
Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	13-00612
Date Notice/Process Served:	03/21/2013
Arbitration Pending?	No
Disposition:	Award to Customer
Disposition Date:	10/21/2014
Monetary Compensation Amount:	\$100,000.00
Individual Contribution Amount:	\$0.00

Disclosure 3 of 3

Reporting Source:	Regulator
Employing firm when activities occurred which led to the complaint:	WESTERN INTERNATIONAL SECURITIES, INC.,
Allegations:	BREACH OF CONTRACT; NEGLIGENCE; BREACH OF FIDUCIARY DUTY; CHURNING; UNAUTHORIZED TRADING; MISREPRESENTATIONS AND OMISSIONS AND UNSUITABILITY.



Product Type: Other: EXCHANGE TRADED FUNDS AND FIXED INCOME PRODUCT

Alleged Damages: \$1,935,230.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: [FINRA - CASE #13-00467](#)

Date Notice/Process Served: 02/13/2013

Arbitration Pending? No

Disposition: Award

Disposition Date: 05/06/2014

Disposition Detail: RESPONDENT IS FOUND JOINTLY AND SEVERALLY LIABLE AND SHALL PAY TO CLAIMANTS COMPENSATORY DAMAGES IN THE AMOUNT OF \$150,000.00, PLUS COMPOUND INTEREST

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: WESTERN INTERNATIONAL SECURITIES, INC.

Allegations: DESPITE THEIR FINANCIAL SOPHISTICATION AND WEALTH OF EXPERIENCE, CLIENTS, WHO AUTHORIZED ALL TRADES BEFORE THEY WERE ENTERED, ALLEGE BREACH OF VARIOUS DUTIES ARISING FROM "UNSUITABLE" TRANSACTIONS FROM 2010-2012, A PERIOD THAT WAS FIVE YEARS AFTER THEY BEGAN THEIR RELATIONSHIP. BECAUSE THE ALLEGATIONS ARE WITHOUT MERIT AND ARE BROUGHT IN BAD FAITH, WE INTEND TO SEEK A DISMISSAL OF THE ARBITRATION AND THE AWARDING OF ALL LEGAL AND ARBITRATION RELATED FEES.

Product Type: Debt-Government
Equity Listed (Common & Preferred Stock)

Alleged Damages: \$1,935,230.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA

Docket/Case #: [13-00467](#)



Date Notice/Process Served: 02/27/2013

Arbitration Pending? No

Disposition: Award to Customer

Disposition Date: 05/06/2014

Monetary Compensation Amount: \$200,000.00

Individual Contribution Amount: \$0.00

Broker Statement CUSTOMER WAS A CPA AND PRESIDENT OF A PRIVATE EQUITY COMPANY SPECIALIZING IN BUILDING EQUITY PROGRAMS AND HAD BROKERAGE ACCOUNTS WITH MS. BENNETT FROM 2005 - 2012 AT THREE DIFFERENT FIRMS. DESPITE HIS SUBSTANTIAL FINANCIAL SOPHISTICATION AND TRADING EXPERIENCE AND DESPITE APPROVING EACH TRADE BEFORE EXECUTION, HE CLAIMED THAT UNAUTHORIZED TRADING TOOK PLACE, YET ADMITTED AT THE HEARING TO NEVER OPENING A SINGLE CONFIRMATION OR MONTHLY STATEMENT OR EVEN READING HIS TAX RETURNS. UNDER OATH, THE CO-FOUNDER OF HIS COMPANY CONTRADICTED CLAIMANTS ASSERTIONS OF BEING UNAWARE OF HIS TRADING ACTIVITY OVER THAT SEVEN YEARS OF INVESTING, CLAIMANT WAS NET POSITIVE, INSPITE OF A HIGH "BURN RATE" OF WITHDRAWALS. THE AMOUNT AWARDED WAS A FRACTION OF THE AMOUNT SOUGHT AND WAS UNRELATED TO ANY CATEGORY OF DAMAGES CLAIMED.



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 11

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Western International Securities, Inc.
Allegations:	Unsuitable recommendations
Product Type:	Other: ETFs
Alleged Damages:	\$4,000,000.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	17-00325
Date Notice/Process Served:	02/13/2017
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	10/05/2018
Monetary Compensation Amount:	\$1,250,000.00
Individual Contribution Amount:	\$0.00

Disclosure 2 of 11

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Western International Securities, Inc.
Allegations:	Unsuitable recommendations
Product Type:	Other: ETFs



Alleged Damages: \$50,000.00
Alleged Damages Amount Explanation (if amount not exact): Claimant included range \$50,000 to \$99,999

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA

Docket/Case #: 16-03535
Date Notice/Process Served: 11/28/2016
Arbitration Pending? No
Disposition: Settled
Disposition Date: 09/05/2017
Monetary Compensation Amount: \$30,000.00
Individual Contribution Amount: \$0.00

Disclosure 3 of 11

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: Western International Securities, Inc.
Allegations: Unsuitable recommendations
Product Type: Mutual Fund
 Other: ETF
Alleged Damages: \$100,000.00
Alleged Damages Amount Explanation (if amount not exact): Between \$100,000 and \$499,999
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 #: 16-03139

**Filing date of
arbitration/CFTC reparation
or civil litigation:** 10/28/2016

Customer Complaint Information

Date Complaint Received: 11/01/2016

Complaint Pending? No

Status: Settled

Status Date: 06/17/2017

Settlement Amount: \$150,000.00

**Individual Contribution
Amount:** \$0.00

Disclosure 4 of 11

Reporting Source: Firm

**Employing firm when
activities occurred which led
to the complaint:** Western International Securities, Inc.

Allegations: Unsuitability

Product Type: Mutual Fund
Other: ETFs

Alleged Damages: \$274,000.00

Arbitration Information

**Arbitration/CFTC reparation
claim filed with (FINRA, AAA,
CFTC, etc.):** FINRA

Docket/Case #: 16-02345

Date Notice/Process Served: 08/18/2016



Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	08/29/2017
Monetary Compensation Amount:	\$240,000.00
Individual Contribution Amount:	\$0.00

Disclosure 5 of 11

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Western International Securities, Inc.
Allegations:	Unsuitability
Product Type:	Other: ETFs
Alleged Damages:	\$100,000.00
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 #:	16-01761
Filing date of arbitration/CFTC reparation or civil litigation:	06/24/2016

Customer Complaint Information

Date Complaint Received:	07/05/2016
Complaint Pending?	No
Status:	Settled
Status Date:	06/14/2017
Settlement Amount:	\$175,000.00



Individual Contribution Amount: \$0.00

Disclosure 6 of 11

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: Western International Securities, Inc.

Allegations: Misrepresentation & Unsuitability

Product Type: Other: ETF

Alleged Damages: \$100,000.00

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 #: 16 -01259

Filing date of arbitration/CFTC reparation or civil litigation: 05/02/2016

Customer Complaint Information

Date Complaint Received: 05/16/2016

Complaint Pending? No

Status: Settled

Status Date: 12/13/2016

Settlement Amount: \$45,500.00

Individual Contribution Amount: \$0.00

Disclosure 7 of 11

Reporting Source: Firm



Employing firm when activities occurred which led to the complaint: Western International Securities, Inc.

Allegations: Unsuitability

Product Type: Mutual Fund
Other: ETF

Alleged Damages: \$99,999.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA

Docket/Case #: 16-00163

Date Notice/Process Served: 02/01/2016

Arbitration Pending? No

Disposition: Settled

Disposition Date: 07/26/2016

Monetary Compensation Amount: \$25,000.00

Individual Contribution Amount: \$0.00

Disclosure 8 of 11

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: Western International Securities, Inc.

Allegations: Unsuitability

Product Type: Other: ETF

Alleged Damages: \$499,999.00

Arbitration Information



Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	16-00134
Date Notice/Process Served:	01/21/2016
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	08/02/2016
Monetary Compensation Amount:	\$50,000.00
Individual Contribution Amount:	\$0.00
Firm Statement	Respondent denies all allegations

Disclosure 9 of 11

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	WESTERN INTERNATIONAL SECURITIES
Allegations:	CLAIMANTS ALLEGES A LACK OF DIVERSIFICATION IN PORTFOLIO DURING THE PERIOD NOV 2010 THROUGH MAY 2014.
Product Type:	Other: EXCHANGE TRADED FUND
Alleged Damages:	\$16,944.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	15-01608
Date Notice/Process Served:	07/14/2015
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	09/14/2015



Monetary Compensation Amount:	\$15,801.15
Individual Contribution Amount:	\$0.00
Broker Statement	THE CLAIM WAS DENIED IN ITS ENTIRETY. MATTER WAS SETTLED TO ELIMINATE CONTINUED LEGAL EXPENSES.

Disclosure 10 of 11

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	WESTERN INTERNATIONAL SECURITIES, INC.
Allegations:	MISREPRESENTATION
Product Type:	Equity Listed (Common & Preferred Stock)
Alleged Damages:	\$0.00
Alleged Damages Amount Explanation (if amount not exact):	AMOUNT TO BE DETERMINED AT THE HEARING OF THIS MATTER

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	15-00589
Date Notice/Process Served:	03/24/2015
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	01/08/2016
Monetary Compensation Amount:	\$65,500.00
Individual Contribution Amount:	\$0.00

Reporting Source:	Broker
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Employing firm when activities occurred which led to the complaint:	WESTERN INTERNATIONAL SECURITIES, INC.
Allegations:	MISREPRESENTATION
Product Type:	Equity Listed (Common & Preferred Stock)
Alleged Damages:	\$0.00
Alleged Damages Amount Explanation (if amount not exact):	AMOUNT TO BE DETERMINED AT THE HEARING OF THIS MATTER
Arbitration Information	
Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	15-00589
Date Notice/Process Served:	03/24/2015
Arbitration Pending?	Yes
Broker Statement	REGISTERED REPRESENTATIVE DENIES ALLEGATIONS

Disclosure 11 of 11

Reporting Source:	Regulator
Employing firm when activities occurred which led to the complaint:	WHEAT FIRST SECURITIES, INC.
Allegations:	MISREPRESENTATION; OMISSION OF FACTS; CHURNING; SUITABILITY
Product Type:	
Alleged Damages:	\$1,151,715.00
Arbitration Information	
Arbitration/Reparation Claim filed with and Docket/Case No.:	NASD - CASE #95-02414
Date Notice/Process Served:	06/16/1995



Arbitration Pending? No

Disposition: Settled

Disposition Date: 04/29/1996

Disposition Detail: CASE IS CLOSED, WITHDRAWN W/ PREJUDICE
ACTUAL/COMPENSATORY DAMAGES, RELIEF
REQUEST IS OVER FOR OTHER REASONS, AWARD AMOUNT JOINTLY AND
SEVERALLY; ACTUAL/COMPENSATORY DAMAGES, RELIEF REQUEST IS
OVER
FOR OTHER REASONS, AWARD AMOUNT JOINTLY AND SEVERALLY;
ACTUAL/COMPENSATORY DAMAGES, RELIEF REQUEST IS OVER FOR
OTHER
REASONS, AWARD AMOUNT JOINTLY AND SEVERALLY; INTEREST, RELIEF
REQUEST IS OVER FOR OTHER REASONS, AWARD AMOUNT JOINTLY AND
SEVERALLY; OTHER COSTS, RELIEF REQUEST IS OVER FOR OTHER
REASONS, AWARD AMOUNT JOINTLY AND SEVERALLY; ATTORNEY'S FEES,
RELIEF REQUEST IS OVER FOR OTHER REASONS, AWARD AMOUNT
JOINTLY
AND SEVERALLY; PUNITIVE/EXEMPLARY DAMAGES, RELIEF REQUEST IS
OVER FOR OTHER REASONS, AWARD AMOUNT JOINTLY AND SEVERALLY;
ACTUAL/COMPENSATORY DAMAGES, RELIEF REQUEST IS
WITHDRAWN/SETTLED/ETC, AWARD AMOUNT JOINTLY AND SEVERALLY;
ACTUAL/COMPENSATORY DAMAGES, RELIEF REQUEST IS
WITHDRAWN/SETTLED/ETC, AWARD AMOUNT JOINTLY AND SEVERALLY;
ACTUAL/COMPENSATORY DAMAGES, RELIEF REQUEST IS
WITHDRAWN/SETTLED/ETC, AWARD AMOUNT JOINTLY AND SEVERALLY;
INTEREST, RELIEF REQUEST IS WITHDRAWN/SETTLED/ETC, AWARD
AMOUNT
JOINTLY AND SEVERALLY; OTHER COSTS, RELIEF REQUEST IS
WITHDRAWN/SETTLED/ETC, AWARD AMOUNT JOINTLY AND SEVERALLY;
ATTORNEY'S FEES, RELIEF REQUEST IS WITHDRAWN/SETTLED/ETC,
AWARD
AMOUNT JOINTLY AND SEVERALLY; PUNITIVE/EXEMPLARY DAMAGES,
RELIEF REQUEST IS WITHDRAWN/SETTLED/ETC, AWARD AMOUNT JOINTLY
AND SEVERALLY

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: WHEAT FIRST SECURITIES, INC.

Allegations: CLIENT ALLEGES THE MARGIN TRADING ACCOUNT'S
RECORD OF REALIZED PROFIT & LOSS WAS MISREPRESENTED; THE



NATURE
 OF STOCKS HELD FOR INVESTMENT PURPOSES IN THE TRADING
 ACCOUNT
 WAS MISREPRESENTED; THAT THE MARGIN ACCOUNT WAS EXCESSIVELY
 TRADING; AND THAT THE MAINTENANCE OF THE MARGIN ACCOUNT WAS
 UNSUITABLE GIVEN THE MAGNITUDE OF LOSSES AND SUFFERED
 THEREIN.
 CLIENT SEEKING DAMAGES IN THE AMOUNT OF \$1,151,715.

Product Type:

Alleged Damages: \$1,151,715.00

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.; 95-02414

Date Notice/Process Served: 06/16/1995

Arbitration Pending? No

Disposition: Settled

Disposition Date: 04/29/1996

Monetary Compensation Amount: \$450,000.00

Individual Contribution Amount:**Broker Statement**

FOR BUSINESS PURPOSES, AND WITHOUT ADMITTING ANY
 LIABILITY ON THE PART OF THE FIRM OF MYSELF, THE MATTER WAS
 SETTLED IN THE AMOUNT OF \$450,000.00 WITHOUT ADMITTING
 LIABILITY.
 THE CLIENTS INVOLVED ARE EXTREMELY SOPHISTICATED



AND EXPERIENCED INVESTORS AND BUSINESS PERSONS WHO MAINTAINED ACCOUNTS IN EXCESS OF \$5 MILLION WITH THE FIRM, AND WHO ALONG WITH THEIR CPA FIRM WERE PROVIDED COMPLETE INFORMATION ON THE ACCOUNT RESULTS. CLIENTS CLAIMS FOR DAMAGES INCLUDE MOSTLY UNREALIZED LOSSES CAUSED SOLELY BY MARKET DECLINES IN MID-1994 AND NOT BY ANY ACTION OF MR. BENNETT



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 2

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Western International Securities, Inc.
Allegations:	Unsuitability; Elder Abuse
Product Type:	Promissory Note
Alleged Damages:	\$600,000.00
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:	12/11/2017
Complaint Pending?	No
Status:	Closed/No Action
Status Date:	04/04/2018
Settlement Amount:	
Individual Contribution Amount:	

Disclosure 2 of 2

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Western International Securities, Inc.
Allegations:	Unsuitability



Product Type: Mutual Fund
Other: ETF

Alleged Damages: \$200,000.00

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: 02/02/2016

Complaint Pending? No

Status: Denied

Status Date: 03/29/2016

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 11

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Western International Securities, Inc.
Allegations:	Unsuitable recommendations
Product Type:	Other: ETFs
Alleged Damages:	\$100,000.00
Alleged Damages Amount Explanation (if amount not exact):	alleged damages between \$100,000 and \$500,000.

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	18-00495
Date Notice/Process Served:	02/08/2018
Arbitration Pending?	Yes

Disclosure 2 of 11

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Western International Securities, Inc.
Allegations:	Unsuitable recommendations
Product Type:	Other: ETFs
Alleged Damages:	\$99,999.00



Alleged Damages Amount Explanation (if amount not exact): Claimant alleges damages of \$50,000 to \$99,000

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA

Docket/Case #: 17-01703

Date Notice/Process Served: 06/30/2017

Arbitration Pending? Yes

Disclosure 3 of 11

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: Western International Securities, Inc.

Allegations: Unsuitable recommendations

Product Type: Other: ETFs

Alleged Damages: \$800,000.00

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 #: 18-01137

Filing date of arbitration/CFTC reparation or civil litigation: 04/13/2018

Customer Complaint Information

Date Complaint Received: 04/13/2018

Complaint Pending? Yes



Settlement Amount:

Individual Contribution Amount:

Disclosure 4 of 11

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Western International Securities, Inc.
Allegations:	Unsuitable Recommendations, misrepresentations
Product Type:	Debt-Corporate Other: ETFs
Alleged Damages:	\$500,000.00
Alleged Damages Amount Explanation (if amount not exact):	Claimant alleged damages between \$500,000 and \$700,000.
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 #:	18-01145
Filing date of arbitration/CFTC reparation or civil litigation:	05/02/2018

Customer Complaint Information

Date Complaint Received:	05/02/2018
Complaint Pending?	Yes

Settlement Amount:

Individual Contribution Amount:



Disclosure 5 of 11

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Western International Securities, Inc.
Allegations:	Unsuitable recommendations
Product Type:	Other: ETFs
Alleged Damages:	\$100,000.00
Alleged Damages Amount Explanation (if amount not exact):	Damaged alleged is \$100,000 to \$500,000
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 #:	18-02467
Filing date of arbitration/CFTC reparation or civil litigation:	07/10/2018

Customer Complaint Information

Date Complaint Received:	07/10/2018
Complaint Pending?	Yes
Settlement Amount:	
Individual Contribution Amount:	

Disclosure 6 of 11

Reporting Source:	Firm
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Employing firm when activities occurred which led to the complaint: Western International Securities, Inc.

Allegations: Unsuitable recommendations

Product Type: Other: ETFs

Alleged Damages: \$100,000.00

Alleged Damages Amount Explanation (if amount not exact): damages alleged \$100,000 to \$500,000.

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 #: 1802646

Filing date of arbitration/CFTC reparation or civil litigation: 07/27/2018

Customer Complaint Information

Date Complaint Received: 07/27/2018

Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:

Disclosure 7 of 11

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: Western International Securities, Inc.

Allegations: Unsuitable recommendations and misrepresentation.



Product Type: Debt-Corporate
Other: ETFs

Alleged Damages: \$800,000.00

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 #: 18-03176

**Filing date of
arbitration/CFTC reparation
or civil litigation:** 09/14/2018

Customer Complaint Information

Date Complaint Received: 09/17/2018

Complaint Pending? Yes

Settlement Amount:

**Individual Contribution
Amount:**

Disclosure 8 of 11

Reporting Source: Firm

**Employing firm when
activities occurred which led
to the complaint:** Western International Securities, Inc.

Allegations: Unsuitable recommendations, misrepresentation.

Product Type: Debt-Corporate
Other: ETFs

Alleged Damages: \$5,000.00

**Alleged Damages Amount
Explanation (if amount not
exact):** NO amount was requested. Firm has reasonable belief damages are greater than \$5,000.



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 #: 18-00968
Filing date of arbitration/CFTC reparation or civil litigation: 03/21/2018

Customer Complaint Information

Date Complaint Received: 03/21/2018
Complaint Pending? Yes
Settlement Amount:
Individual Contribution Amount:

Disclosure 9 of 11

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: Western International Securities, Inc.
Allegations: Unsuitable recommendations.
Product Type: Other: ETFs
Alleged Damages: \$100,000.00
Alleged Damages Amount Explanation (if amount not exact): allege damages \$100,000 to \$500,000.
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 #: 18-03449

**Filing date of
arbitration/CFTC reparation
or civil litigation:** 10/01/2018

Customer Complaint Information

Date Complaint Received: 10/05/2018

Complaint Pending? Yes

Settlement Amount:

**Individual Contribution
Amount:**

Disclosure 10 of 11

Reporting Source: Firm

**Employing firm when
activities occurred which led
to the complaint:** Western International Securities, Inc.

Allegations: Unsuitable recommendations and misrepresentation

Product Type: Debt-Corporate
Other: ETFs

Alleged Damages: \$336,000.00

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:** FIN

Docket/Case #: 18-02766

**Filing date of
arbitration/CFTC reparation
or civil litigation:** 08/06/2018



Customer Complaint Information

Date Complaint Received: 08/30/2018

Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:

Disclosure 11 of 11

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: Western International Securities, Inc.

Allegations: Unsuitable recommendations

Product Type: Other: ETFs

Alleged Damages: \$545,000.00

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 #: 18-02068

Filing date of arbitration/CFTC reparation or civil litigation: 06/01/2018

Customer Complaint Information

Date Complaint Received: 06/07/2018

Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:



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:	Western International Securities, Inc.
Termination Type:	Permitted to Resign
Termination Date:	11/24/2015
Allegations:	Firm decision following discovery of promissory notes with firm customers by registered representative's company without disclosure to the firm.
Product Type:	Promissory Note

End of Report



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