

BrokerCheck Report

ROBERT HUGH HOLLAND

CRD# 2200437

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

Please contact FINRA with any concerns.

About BrokerCheck®

BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.
- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

- **Where did this information come from?**

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
 - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
 - information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

Thank you for using FINRA BrokerCheck.



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at brokercheck.finra.org



For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit www.finra.org.

**ROBERT H. HOLLAND**

CRD# 2200437

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

IA LPL FINANCIAL LLC
 315 SE 7TH ST., STE D
 GRANTS PASS, OR 97526
 CRD# 6413
 Registered with this firm since: 08/18/2023

B LPL FINANCIAL LLC
 315 SE 7TH ST., STE D
 GRANTS PASS, OR 97526
 CRD# 6413
 Registered with this firm since: 08/21/2023

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
- 17 U.S. states and territories

This broker has passed:

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

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

- B CETERA ADVISORS LLC**
 CRD# 10299
 GRANTS PASS, OR
 09/2022 - 08/2023
- IA CETERA INVESTMENT ADVISERS LLC**
 CRD# 105644
 SCHAUMBURG, IL
 09/2020 - 08/2023
- B FIRST ALLIED SECURITIES, INC.**
 CRD# 32444
 GRANTS PASS, OR
 07/2015 - 09/2022

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
Customer Dispute	3



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 17 U.S. states and territories through his or her employer.

Employment 1 of 1

Firm Name: **LPL FINANCIAL LLC**

Main Office Address: **1055 LPL WAY
FORT MILL, SC 29715**

Firm CRD#: **6413**

	SRO	Category	Status	Date
B	FINRA	General Securities Principal	Approved	08/21/2023
B	FINRA	General Securities Representative	Approved	08/21/2023
B	FINRA	General Securities Sales Supervisor	Approved	08/21/2023

	U.S. State/ Territory	Category	Status	Date
B	Alaska	Agent	Approved	08/21/2023
B	Arizona	Agent	Approved	08/21/2023
B	California	Agent	Approved	08/21/2023
B	Florida	Agent	Approved	08/21/2023
B	Georgia	Agent	Approved	08/21/2023
B	Hawaii	Agent	Approved	09/19/2023
B	Idaho	Agent	Approved	08/21/2023
B	Montana	Agent	Approved	08/21/2023
B	Nevada	Agent	Approved	08/21/2023
B	Ohio	Agent	Approved	08/21/2023

Broker Qualifications



Employment 1 of 1, continued

	U.S. State/ Territory	Category	Status	Date
B	Oklahoma	Agent	Approved	08/22/2023
B	Oregon	Agent	Approved	09/07/2023
IA	Oregon	Investment Adviser Representative	Approved	09/07/2023
B	South Dakota	Agent	Approved	01/19/2024
B	Tennessee	Agent	Approved	08/21/2023
B	Texas	Agent	Approved	08/21/2023
IA	Texas	Investment Adviser Representative	Restricted Approval	08/18/2023
B	Utah	Agent	Approved	08/21/2023
B	Washington	Agent	Approved	09/08/2023

Branch Office Locations

LPL FINANCIAL LLC
 315 SE 7TH ST., STE D
 GRANTS PASS, OR 97526



Broker Qualifications

Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below. A passed exam or exam waiver does not permit a broker to do business without an active SRO or state registration.

This individual has passed 4 principal/supervisory exams, 3 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
B General Securities Sales Supervisor - Options Module Examination	Series 9	01/02/2023
B General Securities Sales Supervisor - General Module Examination	Series 10	01/02/2023
B General Securities Sales Supervisor Examination (Options Module & General Module)	Series 8	06/03/1996
B General Securities Principal Examination	Series 24	08/21/1992

General Industry/Product Exams

Exam	Category	Date
B Securities Industry Essentials Examination	SIE	10/01/2018
B Futures Managed Funds Examination	Series 31	07/20/2012
B General Securities Representative Examination	Series 7	06/10/1992

State Securities Law Exams

Exam	Category	Date
IA Uniform Investment Adviser Law Examination	Series 65	02/17/1995
B Uniform Securities Agent State Law Examination	Series 63	06/22/1992

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
B 09/2022 - 08/2023	CETERA ADVISORS LLC	10299	GRANTS PASS, OR
IA 09/2020 - 08/2023	CETERA INVESTMENT ADVISERS LLC	105644	GRANTS PASS, OR
B 07/2015 - 09/2022	FIRST ALLIED SECURITIES, INC.	32444	GRANTS PASS, OR
IA 07/2015 - 11/2020	FIRST ALLIED ADVISORY SERVICES, INC.	137888	GRANTS PASS, OR
IA 10/2012 - 07/2015	AMERIPRISE FINANCIAL SERVICES, INC.	6363	MEDFORD, OR
B 02/2012 - 07/2015	AMERIPRISE FINANCIAL SERVICES, INC.	6363	MEDFORD, OR
IA 11/2005 - 02/2012	SUMMIT FINANCIAL GROUP INC	109485	GRANTS PASS, OR
B 10/2005 - 02/2012	SUMMIT BROKERAGE SERVICES, INC.	34643	GRANTS PASS, OR
B 04/2001 - 11/2005	UBS FINANCIAL SERVICES INC.	8174	WEEHAWKEN, NJ
B 12/1994 - 05/2001	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	7691	NEW YORK, NY
B 09/1992 - 12/1994	A. G. EDWARDS & SONS, INC.	4	ST. LOUIS, MO
B 06/1992 - 09/1992	CHATFIELD DEAN & CO., INC.	14714	GREENWOOD VILLAGE, CO

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
07/2023 - Present	LPL Financial LLC	REGISTERED REPRESENTATIVE	Y	Grants Pass, OR, United States
10/2014 - Present	HOLLAND CAPITAL MANAGEMENT	OWNER	Y	GRANTS PASS, OR, United States



Registration and Employment History

Employment History, continued

Employment	Employer Name	Position	Investment Related	Employer Location
09/2022 - 08/2023	CETERA ADVISORS LLC	REGISTERED REP	Y	GRANTS PASS, OR, United States
11/2020 - 08/2023	FIRST ALLIED ADVISORY SERVICES	INVESTMENT ADVISOR REPRESENTATIVE	Y	SCHAUMBURG, IL, United States
07/2015 - 09/2022	FIRST ALLIED SECURITIES, INC.	REGISTERED REPRESENTATIVE	Y	SAN DIEGO, CA, United States
07/2015 - 11/2020	FIRST ALLIED ADVISORY SERVICES, INC.	INVESTMET ADVISOR REPRESENTATIVE	Y	CHESTERFIELD, MO, United States

Other Business Activities

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

- 1) 07/12/2023 - Holland Capital Management - DBA for LPL Business (entity for LPL business) - Investment related - At reported business location(s) - 50 Hours per month.
- 2) 07/12/2023 - Real Estate Rental - OR 97526 - Investment related - 1 Hour per month - Start date: 7/14/2023.
- 3) 07/12/2023 - KAJO Radio Show - Outside/W-2 Employment - show host - Oregon 97527 - Non investment related - 10 Hours per month - Start date: 6/1/2015.
- 4) 06/12/2024 - Rubicon Advisors - Inv Related - At Reported Business Location(s) - DBA for LPL Business (entity for LPL business) - Started: 8/14/2023 - 160 Hrs/Mo During Trading.

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.
 -
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
Customer Dispute	0	3	N/A



Disclosure Event Details

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

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

Customer Dispute - Settled

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

Disclosure 1 of 3

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	UBS FINANCIAL SERVICES INC.
Allegations:	TIME FRAME: 8/25/05 - 5/19/09 CUSTOMER ALLEGED THAT FA MISREPRESENTED THE INVESTMENT IN THE AUCTION RATE SECURITIES BY STATING THAT THE MONEY WAS SECURE, 100 % GUARANTEED RETURN ON THE PRINCIPAL IN 30 - 35 DAYS UPON REQUEST.
Product Type:	Other: AUCTION RATE SECURITIES - MUNICIPAL DEBT
Alleged Damages:	\$50,000.00
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:	05/19/2009
Complaint Pending?	No
Status:	Settled
Status Date:	12/23/2008



Settlement Amount: \$50,000.00

Individual Contribution Amount: \$0.00

Firm Statement

THE COMPLAINT AROSE IN CONNECTION WITH THE INDUSTRY WIDE BREAKDOWN OF LIQUIDITY IN THE MARKET FOR AUCTION RATE SECURITIES ("ARS"). THE FIRM REPURCHASED THE ARS SECURITIES AT ISSUE AT PAR VALUE FROM THE CLIENT PURSUANT TO A GLOBAL REPURCHASE AGREEMENT IT ENTERED INTO WITH SEVERAL REGULATORY BODIES. THIS WAS NOT A SETTLEMENT OF A DISPUTE BETWEEN THE CLIENT AND THE REPRESENTATIVE AND WAS NOT BASED ON THE MERITS OF THE CLIENT'S SPECIFIC CONCERNS OR ANY FINDING OF FAULT OR WRONGDOING BY THE NAMED REPRESENTATIVE. THE NAMED REPRESENTATIVE WAS NOT A PARTY TO, AND DID NOT AGREE TO OR PARTICIPATE IN, THE REPURCHASE AGREEMENT BETWEEN THE FIRM AND THE RELEVANT REGULATORY BODIES. THE NAMED REPRESENTATIVE DID NOT MAKE ANY PAYMENTS TO THE CLIENT AND THE NAMED REPRESENTATIVE WAS NOT ASKED TO AND DID NOT CONTRIBUTE TO THE SETTLEMENT AMOUNT. THE LISTED "SETTLEMENT AMOUNT" REPRESENTS ONLY THE GROSS INITIAL PAR VALUE OF THE ARS POSITION REPURCHASED FROM THE CLIENT AND DOES NOT TAKE INTO ACCOUNT THE ACTUAL VALUE OF THE ARS POSITION AT THE TIME THE FIRM RECEIVED IT BACK FROM THE CLIENT IN CONNECTION WITH THE REPURCHASE. THIS MATTER IS BEING REPORTED AS A SETTLEMENT PURSUANT TO THE REQUIREMENTS OF FINRA REGULATORY NOTICE 09-12

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: UBS FINANCIAL SERVICES INC

Allegations: TIME FRAME: 8/25/05 - 5/19/09 CUSTOMER ALLEGED THAT FA MISREPRESENTED THE INVESTMENT IN THE AUCTION RATE SECURITIES BY STATING THAT THE MONEY WAS SECURE, 100 % GUARANTEED RETURN ON THE PRINCIPAL IN 30 - 35 DAYS UPON REQUEST.

Product Type: Other: AUCTION RATE SECURITIES - MUNICIPAL DEBT

Alleged Damages: \$50,000.00

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: 05/19/2009

Complaint Pending? No

Status: Settled

Status Date: 12/23/2008

Settlement Amount: \$50,000.00

**Individual Contribution
Amount:** \$0.00

Broker Statement

THE COMPLAINT AROSE IN CONNECTION WITH THE INDUSTRY WIDE BREAKDOWN OF LIQUIDITY IN THE MARKET FOR AUCTION RATE SECURITIES ("ARS"). THE FIRM REPURCHASED THE ARS SECURITIES AT ISSUE AT PAR VALUE FROM THE CLIENT PURSUANT TO A GLOBAL REPURCHASE AGREEMENT IT ENTERED INTO WITH SEVERAL REGULATORY BODIES. THIS WAS NOT A SETTLEMENT OF A DISPUTE BETWEEN THE CLIENT AND THE REPRESENTATIVE AND WAS NOT BASED ON THE MERITS OF THE CLIENT'S SPECIFIC CONCERNS OR ANY FINDING OF FAULT OR WRONGDOING BY THE NAMED REPRESENTATIVE. THE NAMED REPRESENTATIVE WAS NOT A PARTY TO, AND DID NOT AGREE TO OR PARTICIPATE IN, THE REPURCHASE AGREEMENT BETWEEN THE FIRM AND THE RELEVANT REGULATORY BODIES. THE NAMED REPRESENTATIVE DID NOT MAKE ANY PAYMENTS TO THE CLIENT AND THE NAMED REPRESENTATIVE WAS NOT ASKED TO AND DID NOT CONTRIBUTE TO THE SETTLEMENT AMOUNT. THE LISTED "SETTLEMENT AMOUNT" REPRESENTS ONLY THE GROSS INITIAL PAR VALUE OF THE ARS POSITION REPURCHASED FROM THE CLIENT AND DOES NOT TAKE INTO ACCOUNT THE ACTUAL VALUE OF THE ARS POSITION AT THE TIME THE FIRM RECEIVED IT BACK FROM THE CLIENT IN CONNECTION WITH THE REPURCHASE. THIS MATTER IS BEING REPORTED AS A SETTLEMENT PURSUANT TO THE REQUIREMENTS OF FINRA REGULATORY NOTICE 09-12.

Disclosure 2 of 3

Reporting Source: Firm

**Employing firm when
activities occurred which led
to the complaint:** MERRILL LYNCH, PIERCE, FENNER & SMITH INC.



Allegations: CLIENT ALLEGES NON-DISCLOSURE OF WITHDRAWAL FEES ASSOCIATED WITH HIS VARIABLE ANNUITIES. NO SPECIFIC DAMAGES ALLEGED.

Product Type: Annuity(ies) - Variable

Alleged Damages: \$0.00

Customer Complaint Information

Date Complaint Received: 02/20/2002

Complaint Pending? No

Status: Settled

Status Date: 07/10/2002

Settlement Amount: \$12,132.00

Individual Contribution Amount: \$0.00

Firm Statement IN ORDER TO AVOID THE COST AND UNCERTAINTY OF FURTHER DISPUTE REGARDING THIS MATTER, CLIENT WAS PAID \$12,132.00.

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: MERRILL LYNCH, PIERCE, FENNER & SMITH INC.

Allegations: CLIENT ALLEGED NON-DISCLOSURE OF WITHDRAWAL FEES ASSOCIATED WITH HIS VARIABLE ANNUITIES. NO SPECIFIC DAMAGES ALLEGED.

Product Type: Annuity(ies) - Variable

Alleged Damages: \$0.00

Customer Complaint Information

Date Complaint Received: 02/20/2002

Complaint Pending? No

Status: Settled

Status Date: 07/10/2002

Settlement Amount: \$12,132.00

Individual Contribution Amount: \$0.00

**Broker Statement**

IN ORDER TO AVOID THE COST AND UNCERTAINTY OF FURTHER DISPUTE, CLIENT WAS PAID \$12,132. I RECOMMENDED CLIENT PURCHASE ANNUITIES AFTER 3 MEETINGS. CLIENT WANTED TO WITHDRAW \$3000 MONTHLY FOR HIS RETIREMENT IN 1-2 YEARS. AFTER CALCULATING THE IMPACT OF THIS WITHDRAWAL, I TOLD HIM THAT THE MONEY WOULD NOT LAST MORE THAN 6-8 YEARS DEPENDING ON THE PERFORMANCE OF UNDERLYING INVESTMENTS. HE WANTED TO STRETCH OUT PAYMENTS W/IN MODERATE RISK AND PROTECT WIFE SHOULD HE PREDECEASE HER. HE WAS INTERESTED IN AVOIDING TAXES IF POSSIBLE. WE DISCUSSED AN INCOME PORTFOLIO MADE UP OF BONDS-TREASURY, MUNICIPAL AND CORPORATE. HE REJECTED THIS IDEA DUE TO LOW EXPECTED RETURN. I MENTIONED ANNUITIES. I EXPLAINED IT WOULD OFFER PROTECTION FOR HIS WIFE SHOULD HE DIE UNEXPECTEDLY, HAD POTENTIAL FOR GREATER RETURNS DUE TO THE GROWTH ELEMENT AND GROWTH COMPONENT COULD POSSIBLY EXTEND THE LIFE OF ACCT BEFORE IT WAS DEPLETED. WE COVERED ANNUITY FEES AND INVESTMENT CHOICES. CLIENT EXPRESSED INTEREST; I GAVE HIM NEW ACCT PACKET FOR SUN AMERICA INCL PROSPECTUS TO TAKE HOME AND REVIEW. DURING NEXT MEETING, AGAIN DISCUSSED ANNUITY. EMPHASIZED RISK OF GROWTH AND INCOME PORTFOLIO VS. INCOME BOND PROGRAM. SAID INVESTING IS NOT EXACT SCIENCE AND RESULTS CANNOT BE GUARANTEED. CLIENT ACKNOWLEDGED THIS AND SAID HE KNEW HIS MONEY WOULD NOT LAST FOREVER. AT THIS POINT, I SUGGESTED FUNDS SHOULD BE SPLIT BETWEEN 2 ANNUITY CO. TO DIVERSIFY THE MANAGEMENT RISK. NEEDED TO BALANCE THE PAYOUTS TO GET MONTHLY INCOME AND MITIGATE ANY REDEMPTION CHARGES IF POSSIBLE. REVIEWED COSTS AGAIN. NO COST GOING INTO ANNUITY BUT THERE WOULD BE COSTS ONCE WE EXCEEDED ANNUAL DIVIDENDS AND CAPITAL. ALL WITHDRAWALS OVER 10% OF THE PRINCIPAL ANNUALLY WOULD THEN INCUR THE DEFERRED SALES CHARGE. CLIENT SAID HE READ PROSPECTUS AFTER BEING ASKED. AT THE END OF THE MTG, HE WAS GIVEN DOCUMENTS FOR BOTH ANNUITIES. HE RECEIVED CONTRACTS WHEN SETUP. CLIENT SAID RECEIVED ALL INFO AND HAD NO QUESTION

Disclosure 3 of 3

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint:

Allegations: CLIENTS ALLEGE UNSUITABILITY WITH REGARDS TO INVESTMENTS MADE IN THEIR IRA ACCOUNT. THE CLIENTS ALLEGED



LOSSES OF \$35,983.

7A. WHAT WAS THE PRODUCT? STOCKS

Product Type:**Alleged Damages:** \$35,983.00**Customer Complaint Information****Date Complaint Received:** 12/10/1994**Complaint Pending?** No**Status:** Settled**Status Date:****Settlement Amount:** \$10,000.00**Individual Contribution Amount:****Firm Statement** THE COMPLAINT WAS SETTLED FOR \$10,000.
Not Provided**Reporting Source:** Broker**Employing firm when activities occurred which led to the complaint:****Allegations:** CLIENTS ALLEGE UNSUITABILITY WITH REGARDS TO INVESTMENTS MADE IN THEIR IRA ACCOUNT. THE CLIENTS ALLEGED LOSSES OF \$35,983.00.**Product Type:****Alleged Damages:** \$35,983.00**Customer Complaint Information****Date Complaint Received:** 12/10/1994**Complaint Pending?** No**Status:** Settled**Status Date:****Settlement Amount:** \$10,000.00



**Individual Contribution
Amount:**

Broker Statement

THE COMPLAINT WAS SETTLED FOR \$10,000.
Not Provided

End of Report



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