BrokerCheck Report

ROBERT EDWARD GRADY

CRD# 226921

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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.
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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 E. GRADY

CRD# 226921

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:

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

Registration History

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

B **BILTMORE INTERNATIONAL CORPORATION**
CRD# 21163
EDISON, NJ
02/2002 - 10/2006

B **GRADY AND HATCH & COMPANY, INC.**
CRD# 14262
STATEN ISLAND, NY
08/1984 - 07/2001

B **BEARE BROTHERS & CO. INC.**
CRD# 596
06/1983 - 11/1985

Disclosure Events

This broker has been involved in one or more disclosure events involving certain final criminal matters, regulatory actions, civil judicial proceedings, or arbitrations or civil litigations.

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

The following types of disclosures have been reported:

Type	Count
Regulatory Event	7
Customer Dispute	1

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Broker Qualifications

Registrations

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

This broker is not currently registered.

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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 3 principal/supervisory exams, 1 general industry/product exam, and 1 state securities law exam.

Principal/Supervisory Exams

Exam		Category	Date
B	Financial and Operations Principal Examination	Series 27	09/13/1996
B	Registered Options Principal Examination	Series 4	02/06/1986
B	General Securities Principal Examination	Series 00	09/04/1975

General Industry/Product Exams

Exam		Category	Date
B	Registered Representative Examination	Series 1	09/08/1960

State Securities Law Exams

Exam		Category	Date
B	Uniform Securities Agent State Law Examination	Series 63	05/16/1995

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/.

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Broker Qualifications

Professional Designations

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

No information reported.

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Registration and Employment History

Registration History

The broker previously was registered with the following securities firms:

Registration Dates	Firm Name	CRD#	Branch Location
B 02/2002 - 10/2006	BILTMORE INTERNATIONAL CORPORATION	21163	EDISON, NJ
B 08/1984 - 07/2001	GRADY AND HATCH & COMPANY, INC.	14262	STATEN ISLAND, NY
B 06/1983 - 11/1985	BEARE BROTHERS & CO. INC.	596	
B 07/1974 - 12/1979	PROPP & COMPANY, INC.	3094	
B 08/1973 - 05/1974	MACK, BUSHNELL & EDELMAN, INC.	6620	
B 06/1969 - 07/1973	PURCELL GRAHAM & COMPANY	1000003	

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
03/2001 - Present	BILTMORE INTERNATIONAL CORPORATION	REGISTERED REPRESENTATIVE	Y	EDISON, NJ, United States

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Disclosure Events

What you should know about reported disclosure events:

1. **Disclosure events in BrokerCheck reports come from different sources:**
   - As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, their employing firms, and regulators. When more than one source reports information for the same disclosure event, all versions of the event will appear in the BrokerCheck report. The different versions are separated by a solid line with the reporting source labeled.

For your convenience, below is a matrix of the number and status of regulatory 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.

	Final	On Appeal
Regulatory Event	7	0
Customer Dispute	1	N/A

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Disclosure Event Details

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 involves a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations.

Disclosure 1 of 7

Reporting Source:	Regulator
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	
Other Sanction(s) Sought:	
Date Initiated:	09/26/2008
Docket/Case Number:	C10010089
Employing firm when activity occurred which led to the regulatory action:	
Product Type:	No Product
Other Product Type(s):	
Allegations:	RESPONDENT FAILED TO PAY FINES AND/OR COSTS OF $7,788.36 IN FINRA CASE #C10010089
Current Status:	Final
Resolution:	Other
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:	09/26/2008
Sanctions Ordered:	Revocation/Expulsion/Denial

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Other Sanctions Ordered:	
Sanction Details:	IN ACCORDANCE WITH NASD RULE 8320, RESPONDENT'S FINRA REGISTRATION IS REVOKED FOR FAILURE TO PAY FINES AND/OR COSTS.

Disclosure 2 of 7

Reporting Source:	Regulator
Regulatory Action Initiated By:	NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
Sanction(s) Sought:	
Other Sanction(s) Sought:	
Date Initiated:	07/11/2001
Docket/Case Number:	C10010089
Employing firm when activity occurred which led to the regulatory action:	GRADY AND HATCH & COMPANY, INC.
Product Type:	No Product
Other Product Type(s):	
Allegations:	>07/16/01 NASD CONDUCT RULES 2110, 3010 - MEMBER FIRM ACTING THROUGH RESPONDENT, FAILED TO MAINTAIN SUFFICIENT NET CAPITAL WHILE CONDUCTING A SECURITIES BUSINESS; FAILED TO ADOPT, MAINTAIN AND ENFORCE WRITTEN SUPERVISORY PROCEDURES ADEQUATELY DESIGNED TO ENSURE COMPLIANCE WITH SEC RULE 15C3-1 THE, NET CAPITAL RULE.
Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	07/11/2001
Sanctions Ordered:	Monetary/Fine $10,000.00 Suspension
Other Sanctions Ordered:	
Sanction Details:	SUSPENDED FROM ASSOCIATING WITH ANY NASD MEMBER FIRM IN ALL PRINCIPAL CAPACITIES FOR A PERIOD OF FIVE (5) BUSINESS DAYS. **SUSPENSION EFFECTIVE MONDAY AUGUST 6, 2001 TO CLOSE OF

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BUSINESS FRIDAY AUGUST 10, 2001**

Reporting Source:	Firm
Regulatory Action Initiated By:	NASD
Sanction(s) Sought:	Suspension
Other Sanction(s) Sought:	BOB GRADY WAS JOINTLY AND SEVERALLY FINED $10,000.00 ALONG WITH GRADY & HATCH.
Date Initiated:	12/31/1998
Docket/Case Number:	C10010089
Employing firm when activity occurred which led to the regulatory action:	GRADY & HATCH
Product Type:	Other
Other Product Type(s):	NET CAPITAL VIOLATION
Allegations:	FOR A PERIOD FROM DEC 1998 TO FEB 1999 G & H ACTING THROUGH GRADY, FAILED TO ADOPT MAINTAIN AND ENFORCE WRITTEN SUPERVISORY PROCEEDURES ADEQUATELY DESIGNED TO ENSURE COMPLIANCE WITH SEC RULE 15C3-1 THE NET CAPITAL RULE.
Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	07/11/2001
Sanctions Ordered:	Censure Monetary/Fine $10,000.00 Suspension
Other Sanctions Ordered:	
Sanction Details:	MR GRADY WAS SUSPENDED FROM ASSOCIATING WITH ANY NASD MEMBER FIRM IN ALL PRINCIPAL CAPACITIES FOR A PERIOD OF FIVE DAYS.
Firm Statement	GRADY & HATCH WAS FINED JOINTLY AND SEVERALLY $10,000.00 AND WAS CENSURED.

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Reporting Source:	Broker
Regulatory Action Initiated By:	NASD
Sanction(s) Sought:	Suspension
Other Sanction(s) Sought:	FINED $ 10,000.00
Date Initiated:	12/31/1998
Docket/Case Number:	C10010089
Employing firm when activity occurred which led to the regulatory action:	GRADY & HATCH
Product Type:	Other
Other Product Type(s):	NET CAPITAL VIOLATION
Allegations:	NASD CONDUCT RULES 2110 AND 3010 . MEMBER FIRM ACTING THRU RESPONDENT , FAILED TO MAINTAIN SUFFICIENT NET CAPITAL WHILE CONDUCTING A SECURITIES BUSINESS . FAIL TO ADOPT , MAINTAIN AND ENFORCE WRITTEN SUPERVISORY PROCEDURES ADEQUATELY DESIGNED TO ENSURE COMPLIANCE WITH SEC RULE 15C3-1, THE NET CAPITAL RULE.
Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	07/11/2001
Sanctions Ordered:	Monetary/Fine $10,000.00 Suspension
Other Sanctions Ordered:	
Sanction Details:	SUSPENDED FROM ASSOCIATION WITH ANY NASD MEMBER IN ALL PRINCIPAL CAPACITY FOR 5 BUSINESS DAYS. SUSPENSION EFFECTIVE AUGUST 6, 2001 TO CLOSE OF BUSINESS AUGUST 10TH 2001.

Disclosure 3 of 7

Reporting Source:	Regulator
Regulatory Action Initiated By:	IOWA SECURITIES BUREAU, ROBERT KOPPIN (515) 281-4441

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Sanction(s) Sought:	Suspension
Other Sanction(s) Sought:	
Date Initiated:	11/08/1999
Docket/Case Number:	C00-08-023
Employing firm when activity occurred which led to the regulatory action:	GRADY AND HATCH & COMPANY, INC.
Product Type:	No Product
Other Product Type(s):	
Allegations:	THE IOWA SECURITIES BUREAU ALLEGED THAT ON APRIL 19, 1999, THE U.S. SECURITIES AND EXCHANGE COMMISSION ISSUED AN ORDER AGAINST GRADY FINDING THAT HE FAILED TO REASONABLY SUPERVISE A TRADER EMPLOYED AT THE FIRM. GRADY WAS SUSPENDED FOR A PERIOD OF NINE MONTHS IN A SUPERVISORY CAPACITY WITH ANY BROKER OR DEALER BEGINNING ON OR ABOUT JUNE 3, 1999. THE BUREAU REQUESTED THAT GRADY'S SECURITIES AGENT LICENSE IN IOWA BE SUSPENDED UNTIL HIS SUPERVISORY SUSPENSION WAS COMPLETED.
Current Status:	Final
Resolution:	Decision
Resolution Date:	12/13/1999
Sanctions Ordered:	Suspension
Other Sanctions Ordered:	
Sanction Details:	GRADY WAS SUSPENDED AS A SECURITIES AGENT IN THE STATE OF IOWA FROM DECEMBER 13, 1999 (WHEN THE ALJ'S DECISION BECAME FINAL) UNTIL MARCH 3, 2000.
Regulator Statement	THE ALJ FOUND FROM THE EVIDENCE PRESENTED THAT GRADY WAS SUBJECT TO AN ORDER ENTERED AFTER NOTICE AND OPPORTUNITY FOR A HEARING ISSUED BY THE SEC THAT FOUND GRADY IN VIOLATION OF THE SECURITIES EXCHANGE ACT OF 1934 FOR WHICH HE WAS DENIED THE RIGHT TO DO BUSINESS IN THE SECURITIES INDUSTRY. THESE FACTS BRING GRADY WITHIN THE PROVISIONS OF IOWA CODE SECTIONS 502.304(1)(F),(K),&(L) AND THEREFORE SUBJECT TO THE SANCTIONS THEREIN. GRADY WAS SUSPENDED FROM THE DATE THE ORDER BECAME FINAL, DECEMBER 13, 1999 UNTIL MARCH 3, 2000.

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Reporting Source:	Broker
Regulatory Action Initiated By:	IOWA
Sanction(s) Sought:	Suspension
Other Sanction(s) Sought:	
Date Initiated:	11/08/1999
Docket/Case Number:	C00-08-023
Employing firm when activity occurred which led to the regulatory action:	GRADY & HATCH
Product Type:	No Product
Other Product Type(s):	
Allegations:	THE STATE OF IOWA ALLEGED THAT ON APRIL 19,1999 THE US SEC AND EXCHANGE COMMISSION ISSUED AN ORDER AGAINST MR GRADY FINDING THAT HE FAILED TO SUPERVISEA TRADER.GRADY WAS SUSPENDED FOR NINE MONTHS IN A SUPERVISORY CAPACITY BEGINING JUNE 3,1999. IOWA REQUEST THAT MR GRADY LICENSE BE SUSPENDED UNTIL HIS SUSPENSION IS LIFTED.
Current Status:	Final
Resolution:	Decision
Resolution Date:	12/13/1999
Sanctions Ordered:	Suspension
Other Sanctions Ordered:	
Sanction Details:	MR GRADY WAS SUSPENDED FROM DEC 13,1999 THROUGH MARCH 3,2000 IN THE STATE OF IOWA WHEN THE ALJ'S DECISION BECAME FINAL.
Broker Statement	THE ALJ FOUND THE EVIDENCE PRESENTED THAT MR GRADY WAS SUBJECT TO AN ORDER ENTERED AFTER NOTICE AND OPPORTUNITY FOR A HEARING ISSUED BY THE SEC THAT FOUND GRADY IN VIOLATION OF THE SEC ACT OF 1934. THESE FACTS BRING GRADY WITHIN THE PROVISIONS OF THE IOWA CODESECTIONS 502.304(1)(F)(K)(L)AND THEREFORE SUBJECT TO SANCTIONS THEREIN. GRADY WAS SUSPENDED FROM DEC 13,1999 UNTIL MARCH 3,2000.

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Disclosure 4 of 7

Reporting Source:	Regulator
Regulatory Action Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Sanction(s) Sought:	
Other Sanction(s) Sought:	
Date Initiated:	04/20/1999
Docket/Case Number:	
Employing firm when activity occurred which led to the regulatory action:	GRADY & HATCH & CO.
Product Type:	
Other Product Type(s):	
Allegations:	
Current Status:	Final
Resolution:	Order
Resolution Date:	04/20/1999
Sanctions Ordered:	Disgorgement/Restitution Suspension
Other Sanctions Ordered:	
Sanction Details:	
Regulator Statement	+05/11/99+ SEC NEWS DIGEST, ISSUE NO. 99-75, DATED APRIL 20, 1999, ENFORCEMENT PROCEEDINGS DISCLOSES; "ORDER INSTITUTING ADMINISTRATIVE PROCEEDINGS, MAKING FINDINGS, AND IMPOSING REMEDIAL SANCTIONS ENTERED AGAINST ROBERT GRADY." The Commission announced that it simultaneously instituted and settled administrative proceedings against Robert Grady. The Commission made the following findings in the Order, which Grady neither admitted nor denied. The Commission found that Grady was the chief executive and compliance officer of Grady & Hatch & Co., a registered broker-dealer, and supervised a trader at Grady & Hatch during the period at issue. From May 5 through at least July 20, 1993, the trader manipulated the

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price of RMS Titanic stock from $5.00 to $11.50 on minimal trading volume or public interest. The trader set the initial price based solely upon the directions of a major shareholder and promoter of RMS Titanic; raised the price of RMS Titanic stock without any market basis for doing so; and effected trades with the understanding that other participants in the scheme would protect him from risk of loss by buying any long position or covering any short position the trader held. The Order finds that Grady failed reasonably to supervise the trader at Grady & Hatch with a view to preventing the trader's violations of Section 17(a) of the Securities Act of 1933 and Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder. The Order suspends Grady from association with any broker or dealer for a period of one month, and immediately following the period of his suspension from association, suspends him from association in a supervisory capacity with any broker or dealer for a period of nine months, and orders him to disgorge $3,447 plus $1,668.61 in prejudgment interest and pay a civil penalty of $5,000. (Rel. 34- 41309; File No. 3-9876)

Reporting Source:	Broker
Regulatory Action Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Sanction(s) Sought:	Disgorgement
Other Sanction(s) Sought:	SUSPENSION
Date Initiated:	04/20/1999
Docket/Case Number:	
Employing firm when activity occurred which led to the regulatory action:	GRADY & HATCH & CO.
Product Type:	Equity - OTC
Other Product Type(s):	
Allegations:	FAILURE TO REASONABLY SUPERVIVE THE FIRMS TRADER
Current Status:	Final

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Resolution:	Order
Resolution Date:	04/20/1999
Sanctions Ordered:	Disgorgement/Restitution Monetary/Fine $5,000.00 Suspension
Other Sanctions Ordered:	
Sanction Details:	ONE MONTH SUSPENSION; SUPERVISORY CAPACITY SUSPENDED FOR NINE MONTHS CIVIL PENALTY $5000.00 ONGORGEMENT OF $3447.00 PLUS PREJUDGEMENT INTEREST OF $1668.61 FOR TOTAL OF $5115.65
Broker Statement	NOT PROVIDED

Disclosure 5 of 7

Reporting Source:	Regulator
Regulatory Action Initiated By:	NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
Sanction(s) Sought:	
Other Sanction(s) Sought:	
Date Initiated:	05/05/1995
Docket/Case Number:	C10950029
Employing firm when activity occurred which led to the regulatory action:	GRADY & HATCH & CO., INC.
Product Type:	
Other Product Type(s):	
Allegations:	
Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	05/05/1995
Sanctions Ordered:	Censure Monetary/Fine $15,000.00

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Other Sanctions Ordered:

Sanction Details:

Regulator Statement

ON MAY 5, 1995, DISTRICT NO. 10 NOTIFIED RESPONDENTS GRADY AND HATCH & CO., INC., RAYMOND A. HATCH AND ROBERT E. GRADY THAT THE LETTER OF ACCEPTANCE, WAIVER AND CONSENT NO. C10950029 WAS
ACCEPTED; THEREFORE, THEY ARE CENSURED AND FINED $15,000, JOINTLY AND SEVERALLY, AND RESPONDENT HATCH IS REQUIRED TO REQUALIFY AS A FINANCIAL AND OPERATIONS PRINCIPAL WITHIN 90 DAYS OF THE ACCEPTANCE OF THIS LETTER OF ACCEPTANCE, WAIVER AND
CONSENT. - (ARTICLE III, SECTION 1 OF THE RULES OF FAIR PRACTICE - RESPONDENT MEMBER, ACTING THROUGH RESPONDENT HATCH,
FAILED TO MAINTAIN THE REQUIRED MINIMUM NET CAPITAL WHILE CONDUCTING A SECURITIES BUSINESS, AND, RESPONDENT MEMBER, ACTING THROUGH RESPONDENT GRADY, FAILED TO ESTABLISH AN ESCROW
ACCOUNT IN CONNECTION WITH THE BEST EFFORTS UNDERWRITING OF A
STOCK OFFERING).

$15,000.00 FULLY PAID J&S ON 5/15/96, INVOICE #95-10-292

Reporting Source: Broker

Regulatory Action Initiated By: NASD

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 05/05/1995

Docket/Case Number: C10950029

Employing firm when activity occurred which led to the regulatory action: GRADY & HATCH & CO., INC.

Product Type:

Other Product Type(s):

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Allegations:	NASD ALLEGED THAT GRADY AND HATCH & COMPANY INC. ACTING THROUGH ROBERT E. GRADY FAILED TO ESTABLISH AN ESCROW ACCOUNT IN CONNECTION WITH A BEST EFFORTS UNDERWRITING OF A STOCK. THE NASD ALSO ALLEGED THAT THE FIRM, ACTING THROUGH MR. HATCH, FAILED TO MAINTAIN THE REQUIRED MINIMUM NET CAPITAL WHILE CONDUCTING A SECURITIES BUSINESS.
Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	05/05/1995
Sanctions Ordered:	Censure Monetary/Fine $15,000.00
Other Sanctions Ordered:	
Sanction Details:	NASD ACCEPTED THE SUBMITTED ACCEPTANCE, WAIVER AND CONSENT WHEREIN THE FIRM, GRADY AND HATCH, WITHOUT ADMITTING OR DENYING THE ALLEGATIONS AGREED TO A CENSURE AND FINE OF $15,000.00 JOINTLY AND SEVERALLY. MR. HATCH ALSO AGREED TO REQUALIFY AS A FINANCIAL AND OPERATIONS PRINCIPAL WITHIN 90 DAYS OF THE ACCEPTANCE OF THE CONSENT. MR. HATCH HAS BEEN REPLACED AS FINANCIAL PRINCIPAL.
Broker Statement	Not Provided

Disclosure 6 of 7

Reporting Source:	Regulator
Regulatory Action Initiated By:	MASSACHUSETTS SECURITIES DIVISION
Sanction(s) Sought:	
Other Sanction(s) Sought:	
Date Initiated:	04/28/1993
Docket/Case Number:	R-93-064
Employing firm when activity occurred which led to the regulatory action:	GRADY & HATCH & COMPANY, INC.
Product Type:	

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Other Product Type(s):	
Allegations:	Not Provided
Current Status:	Final
Resolution:	Consent
Resolution Date:	07/07/1993
Sanctions Ordered:	Monetary/Fine $120.00
Other Sanctions Ordered:	
Sanction Details:	ON JULY 7, 1993 A CONSENT ORDER WAS ENTERED BY THE MASSACHUSETTS SECURITIES DIVISION IN RESPECT TO GRADY AND HATTCH, ROBERT E. GRADY AND RAYMOND A. HATCH
Regulator Statement	A CONSENT ORDER WAS ENTERED ON JULY 7, 1993 PURUSANT TO WHICH GRADY AND HATCH, ROBERT E. GRADY AND RAYMOND A. HATCH CONSENTED TO A) PAY A FINE IN THE AMOUNT OF $120.00 WHICH WAS THE TOTAL GROSS AMOUNT OF COMPENSATION DERIVED FROM SECURITIES TRANSACTIONS CONDCUTED BY THE FIRM IN MA WHEN IT WAS NOT REGISTERED IN MA; B) TO PAY COSTS OF $150.00; AND C) TO WITHDRAW THEIR APPLICATIONS FOR REGISTRATION IN MASSACHUSETTS.

Reporting Source:	Broker
Regulatory Action Initiated By:	MASSACHUETTS SECRETARY OF STATE, SECURITIES DIVISION
Sanction(s) Sought:	
Other Sanction(s) Sought:	
Date Initiated:	04/28/1993
Docket/Case Number:	R-93-064
Employing firm when activity occurred which led to the regulatory action:	GRADY & HATCH & COMPANY, INC.
Product Type:	

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Other Product Type(s):	
Allegations:	ALLEGED VIOLATION OF MASS. GEN. LAWS 201 (A), 404. FAILURE TO DISCLOSE MATERIAL INFORMATION ON FORM BD REGARDING REVOCATION OF REGISTRAION IN STATE OF COLORADO FAILURE TO DISCLOSE OF FROM BD FINDINGS OF THE NASD MARKET SURVEILLANCE COMMITTEE. FAILURE TO FILE COMPLETE U-4 APPLICATION SEE ATTACHED COPY OF ADMINISTRATIVE COMPLAINT FOR FULL DETAILS
Current Status:	Final
Resolution:	Consent
Resolution Date:	07/07/1993
Sanctions Ordered:	Monetary/Fine $120.00
Other Sanctions Ordered:	
Sanction Details:	CONSENT ORDER PROVIDED FOR: G & H TO FILE A FORM BDW WITH THE NASD WITHDRAWING ITS APPLICATION IN MASSACHUSETTS, G&H TO MAKE WRITTEN ORDERS OF RECISSION TO ALL MASSACHUSETTS CUSTOMERS, PAYMENT OF A $120.00 ADMINISTRATIVE FINE, PAYMENT OF SETTLEMENT COSTS IN THE AMOUNT OF $150.00, SEE ATTACHED CONSENT ORDER FOR FULL DETAILS .
Broker Statement	Not Provided

Disclosure 7 of 7

Reporting Source:	Regulator
Regulatory Action Initiated By:	NEW YORK STOCK EXCHANGE
Sanction(s) Sought:	
Other Sanction(s) Sought:	
Date Initiated:	03/01/1967
Docket/Case Number:	Unknown
Employing firm when activity occurred which led to the regulatory action:	MERRILL LYNCH & CO.

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Product Type:	
Other Product Type(s):	
Allegations:	
Current Status:	Final
Resolution:	Decision
Resolution Date:	05/26/1967
Sanctions Ordered:	Suspension
Other Sanctions Ordered:	
Sanction Details:	
Regulator Statement	05-29-67: NEW YORK STOCK EXCHANGE, INC. SUSPENDED RESPONDENT ONE MONTH. THE EXCHANGE FOUND THAT GRADY'S CONDUCT WAS INCONSISTENT WITH JUST AND EQUITABLE PRINCIPLES OF TRADE IN THAT HE PREPARED A FICTITIOUS CONFIRMATION AND STATEMENT WHICH HE SENT TO A CUSTOMER. HE ALSO FAILED TO CONFORM TO THE PRINCIPLES OF RULE 401 BY FAILING TO ADVISE HIS MEMBER FIRM EMPLOYER THAT THE ACCOUNT OF KATHLEEN KANE WAS HIS WIFE'S ACCOUNT CARRIED IN HER MAIDEN NAME.

Reporting Source:	Broker
Regulatory Action Initiated By:	NEW YORK STOCK EXCAHNGE
Sanction(s) Sought:	
Other Sanction(s) Sought:	
Date Initiated:	03/01/1967
Docket/Case Number:	Unknown
Employing firm when activity occurred which led to the regulatory action:	MERRILL LYNCH & CO.
Product Type:	
Other Product Type(s):	

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Allegations:	NYSE ALLEGED THAT ROBERT E GRADY, WHILE EMPLOYED AS A REGISTERED REPRESENTATIVE FOR MERRILL LYNCH & CO., PREPARED A FICTITIOUS CONFIRMATION WHICH HE SENT TO A CUSTOMER THUS ENGAGING IN CONDUCT INCONSISTENT WITH JUST & EQUITABLE PRINCIPLES OF FAIR TRADE, AND FAILED TO CONFORM TO THE PRINCIPLES OF RULE 40 BY FAILING TO ADVISE HIS EMPLOYER THAT THE ACCOUNTG OF KATHLEE KANE WAS HIS WIF'S ACCOUNT CARRIED IN HER MAIDEN NAME.
Current Status:	Final
Resolution:	Decision
Resolution Date:	05/26/1967
Sanctions Ordered:	Suspension
Other Sanctions Ordered:	
Sanction Details:	MR. GRADY WAS SUSPENDED BY THE NYSE FORM MAY 26, 1967 THROUGH JUNE 26, 1967.
Broker Statement	Not Provided

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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 named broker that resulted in an arbitration award or civil judgment for the customer.

Disclosure 1 of 1

Reporting Source:	Regulator
Employing firm when activities occurred which led to the complaint:	GRADY AND HATCH & COMPANY, INC.
Allegations:	07-23-01, NEGLIGENCE; MISREPRESENTATION; OMISSION OF FACTS; INDUCEMENT;FRAUD;FAILURE TO DISCLOSE;MANIPULATION;TRADING FOR THE FIRM'S OWN ACCOUNT OR THAT OF ITS ASSOCIATED PERSONS; COMMINGLING MONIES;CONDUCT INCONSISTENT WITH JUST AND EQUITABLE FAIR TRADE;MAIL AND WIRE FRAUD;FAILURE TO SUPERVISE;AND VIOLATIONS OF ALL LAWS RELATING TO THE SALE OF PENNY STOCK.
Product Type:	Penny Stock(s)
Alleged Damages:	$49,999.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.:	NASD - CASE #00-00093
Date Notice/Process Served:	01/07/2001
Arbitration Pending?	No
Disposition:	Award
Disposition Date:	06/18/2001
Disposition Detail:	RESPONDENT GRADY IS JOINTLY AND SEVERALLY LIABLE TO CLAIMANT IN THE AMOUNT OF $25,000.00, PLUS INTEREST, AS COMPENSATORY DAMAGES.

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	GRADY AND HATCH & COMPANY INC
Allegations:	NEGLIGENCE; MISREPRESENTATION; INDUCEMENT; ETC., ETC., RELATING TO THE SALE OF A PENNY STOCK.

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Product Type:	Equity - OTC
Alleged Damages:	$25,000.00

Customer Complaint Information

Date Complaint Received:	01/07/2001
Complaint Pending?	No
Status:	Arbitration/Reparation
Status Date:	06/18/2001
Settlement Amount:	
Individual Contribution Amount:	

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.:	NASD ARBITRATION CASE # 00-00093
Date Notice/Process Served:	06/18/2001
Arbitration Pending?	No
Disposition:	Award to Customer
Disposition Date:	06/18/2001
Monetary Compensation Amount:	$25,000.00
Individual Contribution Amount:	$12,500.00

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End of Report

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