

## BrokerCheck Report

**MATTHEW MORGAN DOOLEY**

CRD# 2507851

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Broker Qualifications	2 - 3
Registration and Employment History	5
Disclosure Events	6



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



For additional information about the contents of this report, please refer to the User Guidance or [www.finra.org/brokercheck](http://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).

**MATTHEW M. DOOLEY**

CRD# 2507851

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
- 1 General Industry/Product Exam
- 1 State Securities Law Exam

### Registration History

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

- B** **INTERNET SECURITIES**  
CRD# 102800  
OAKLAND, CA  
05/2007 - 12/2009
- B** **A. G. EDWARDS & SONS, INC.**  
CRD# 4  
REDWOOD SHORES, CA  
11/2005 - 02/2007

### 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	2
Criminal	2

### Investment Adviser Representative Information

The information below represents the individual's record as a broker. For details on this individual's record as an investment adviser representative, visit the SEC's Investment Adviser Public Disclosure website at

<https://www.adviserinfo.sec.gov>

## 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.



## 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 0 principal/supervisory exams, 1 general industry/product exam, and 1 state securities law exam.**

### Principal/Supervisory Exams

Exam	Category	Date
No information reported.		

### General Industry/Product Exams

Exam	Category	Date
<b>B</b> General Securities Representative Examination	Series 7	11/01/2005

### State Securities Law Exams

Exam	Category	Date
<b>B IA</b> Uniform Combined State Law Examination	Series 66	11/16/2005

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/](http://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 securities firms:

Registration Dates	Firm Name	CRD#	Branch Location
<b>B</b> 05/2007 - 12/2009	INTERNET SECURITIES	102800	OAKLAND, CA
<b>B</b> 11/2005 - 02/2007	A. G. EDWARDS & SONS, INC.	4	REDWOOD SHORES, CA

### 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
03/2007 - Present	INTERNET SECURITIES	FINANCIAL CONSULTANT	Y	OAKLAND, CA, United States

# 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	2	0
Criminal	2	0





## 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 2

<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	FINRA
<b>Sanction(s) Sought:</b>	Suspension
<b>Date Initiated:</b>	09/15/2011
<b>Docket/Case Number:</b>	09-06292
<b>Employing firm when activity occurred which led to the regulatory action:</b>	INTERNET SECURITIES
<b>Product Type:</b>	No Product
<b>Allegations:</b>	RESPONDENT DOOLEY FAILED TO COMPLY WITH AN ARBITRATION AWARD OR SETTLEMENT AGREEMENT OR TO SATISFACTORILY RESPOND TO A FINRA REQUEST TO PROVIDE INFORMATION CONCERNING THE STATUS OF COMPLIANCE.
<b>Current Status:</b>	Final
<b>Resolution:</b>	LETTER
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	09/15/2011
<b>Sanctions Ordered:</b>	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:** 09/15/2011

**End Date:**

**Regulator Statement** PURSUANT TO ARTICLE VI, SECTION 3 OF FINRA BY-LAWS AND FINRA RULE 9554, RESPONDENT DOOLEY IS SUSPENDED FOR FAILURE TO COMPLY WITH AN ARBITRATION AWARD OR SETTLEMENT AGREEMENT OR TO SATISFACTORILY RESPOND TO A FINRA REQUEST TO PROVIDE INFORMATION CONCERNING THE STATUS OF COMPLIANCE.

#### Disclosure 2 of 2

**Reporting Source:** Regulator

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:** Other: N/A

**Date Initiated:** 06/15/2011

**Docket/Case Number:** [2009020930301](#)



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

INTERNET SECURITIES

**Product Type:**

Equity Listed (Common & Preferred Stock)  
Mutual Fund  
Other: EXCHANGE TRADED FUNDS (ETFs),

**Allegations:**

FINRA RULES 2010, 8210, NASD RULES 2110, 2310, 2330: DOOLEY MADE UNSUITABLE RECOMMENDATIONS TO CUSTOMERS AND SHARED IN A CUSTOMER'S LOSSES WITHOUT OBTAINING APPROPRIATE PRIOR WRITTEN AUTHORIZATION FROM THE CUSTOMER AND HIS MEMBER FIRM. THESE CUSTOMERS SIGNED ACCOUNT APPLICATIONS IN ORDER TO OPEN ACCOUNTS WITH DOOLEY AT HIS FIRM. ACCORDING TO THE APPLICATIONS, ONE OF THE CUSTOMERS' INVESTMENT EXPERIENCE CONSISTED OF APPROXIMATELY 4 TRANSACTIONS PER YEAR IN STOCKS AND MUTUAL FUNDS OVER THE COURSE OF APPROXIMATELY 10 YEARS, AND THE OTHER CUSTOMER'S INVESTMENT EXPERIENCE CONSISTED OF APPROXIMATELY 2 TRANSACTIONS PER YEAR IN STOCKS AND MUTUAL FUNDS OVER THE COURSE OF APPROXIMATELY 25 YEARS. THE SECURITIES AT ISSUE IN THIS CASE CONSIST OF DIFFERENT EXCHANGE TRADED FUNDS (ETFs); EACH OF THESE ETFs WAS DESIGNED TO CORRESPOND TO A MULTIPLE OF THE INVERSE OF THE DAILY PRICE PERFORMANCE OF AN UNDERLYING INDEX. THE PROSPECTUSES PERTAINING TO THESE ETFs EXPLICITLY STATE THAT THEY EMPLOY LEVERAGING, WHICH IS CONSIDERED A "SPECULATIVE" TECHNIQUE; THE PROSPECTUSES FURTHER EXPLICITLY STATE THAT THE ETFs SHOULD NOT BE EXPECTED TO ACHIEVE THEIR STATED OBJECTIVES WHEN HELD FOR LONGER THAN ONE DAY. THE CUSTOMERS' CHOSEN INVESTMENT OBJECTIVES WERE GROWTH AND INCOME; OTHER INVESTMENT OBJECTIVES ON THE ACCOUNT APPLICATION NOT SELECTED BY BOTH CUSTOMERS WERE SPECULATION AND DAY TRADE. DOOLEY RECOMMENDED AND EFFECTED PURCHASES AND SALES OF THE ETFs; THE VAST MAJORITY OF THESE TRANSACTIONS INVOLVED HOLDING PERIODS OF LONGER THAN ONE DAY; SEVERAL ETFs WERE HELD FOR MONTHS IN THESE CUSTOMERS' ACCOUNTS. THE CUSTOMERS' INVESTMENT OBJECTIVES WERE INCONSISTENT WITH THE PURCHASED ETFs WHICH, AS DESCRIBED BY THEIR PROSPECTUSES, EMPLOYED SPECULATIVE TECHNIQUES AND WERE DESIGNED TO BE TRADING INSTRUMENTS (I.E., HELD FOR NO MORE THAN ONE DAY) RATHER THAN SECURITIES DESIGNED FOR GROWTH OR INCOME. FURTHER, THE FACT THAT DOOLEY REPEATEDLY CAUSED THESE CUSTOMERS TO HOLD THE ETFs FOR LONGER THAN ONE DAY DEMONSTRATES HIS FUNDAMENTAL MISUNDERSTANDING OF THESE SECURITIES, SUCH THAT ANY RECOMMENDATION HE MADE PERTAINING TO THEM COULD NOT HAVE



BEEN BASED ON REASONABLE GROUNDS; BASED ON THE FOREGOING, DOOLEY DID NOT HAVE REASONABLE GROUNDS FOR BELIEVING THAT HIS RECOMMENDATIONS TO PURCHASE AND SELL THE ETFS WERE SUITABLE FOR THE CUSTOMERS. AS A RESULT OF DOOLEY'S UNSUITABLE RECOMMENDATIONS, THE CUSTOMERS EXPERIENCED MARKET LOSSES OF APPROXIMATELY \$45,307. A CUSTOMER CONTACTED DOOLEY TO COMPLAIN ABOUT THE LOSSES SHE SUFFERED FROM DOOLEY'S ETF TRADES; THE CUSTOMER SUBSEQUENTLY TOLD DOOLEY TO INVEST HER MONEY IN CERTAIN BONDS; DOOLEY DID NOT HONOR THE CUSTOMER'S REQUEST BUT, INSTEAD, CONTINUED TO PURCHASE AND SELL THE ETFS. THE CUSTOMER CONTACTED THE PRESIDENT OF THE FIRM TO COMPLAIN ABOUT DOOLEY'S FAILURE TO HONOR HER INSTRUCTIONS; THE PRESIDENT OF THE FIRM IMMEDIATELY CONTACTED DOOLEY TO OBTAIN ADDITIONAL INFORMATION ABOUT THE CIRCUMSTANCES SURROUNDING THE CUSTOMER'S COMPLAINT. DOOLEY THEN CONTACTED THE CUSTOMER; AT THAT TIME, HE GAVE HER A HANDWRITTEN NOTE STATING THAT HE WOULD PAY HER \$1,000 PER MONTH FOR EIGHTEEN MONTHS; DOOLEY MADE FOUR PAYMENTS TO THE CUSTOMER TOTALING \$2,500. DOOLEY NEVER NOTIFIED ANYONE AT THE FIRM ABOUT THESE PAYMENTS AND DID NOT OBTAIN WRITTEN AUTHORIZATION FROM THE CUSTOMER TO MAKE THESE PAYMENTS; AT NO TIME DID DOOLEY EVER CONTRIBUTE ANY FUNDS TO THE CUSTOMER'S ACCOUNT. DOOLEY FAILED TO RESPOND TO FINRA REQUESTS FOR DOCUMENTS AND INFORMATION.

<b>Current Status:</b>	Final
<b>Resolution:</b>	Decision
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	11/25/2011
<b>Sanctions Ordered:</b>	Bar (Permanent)
<b>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?</b>	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:** Bar (Permanent)

**Capacities Affected:** All Capacities

**Duration:**

**Start Date:** 11/25/2011

**End Date:**

#### **Regulator Statement**

DEFAULT DECISION RENDERED OCTOBER 27, 2011, WHEREIN DOOLEY IS BARRED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY FOR FAILING TO RESPOND TO FINRA REQUESTS FOR INFORMATION AND DOCUMENTS. DECISION BECAME FINAL NOVEMBER 25, 2011.



## Criminal - Final Disposition

This type of disclosure event involves a conviction or guilty plea for any felony or certain misdemeanor offenses, including bribery, perjury, forgery, counterfeiting, extortion, fraud, and wrongful taking of property that is currently on appeal.

### Disclosure 1 of 2

<b>Reporting Source:</b>	Broker
<b>Court Details:</b>	THEFT, SAN MATEO COUNTY, CA; CASE#NO155345 PHONE#650 877-5771
<b>Charge Date:</b>	08/04/1986
<b>Charge Details:</b>	1 FELONY THEFT
<b>Felony?</b>	Yes
<b>Current Status:</b>	Final
<b>Status Date:</b>	09/05/1986
<b>Disposition Details:</b>	CHARGE REDUCED TO MISDEMEANOR- MISAPPROPRIATION OF FOUND PROPERTY PLED NO CONTEST,FINE AND COMMUNITY SERVICE

### Disclosure 2 of 2

<b>Reporting Source:</b>	Broker
<b>Court Details:</b>	MARIN COUNTY, CA CASE#CO703382A
<b>Charge Date:</b>	12/23/1981
<b>Charge Details:</b>	MISDEMEANOR CHARGE OF PETTY THEFT,MARIN COUNTY,CA; CHARGE WAS DISMISSED
<b>Felony?</b>	No
<b>Current Status:</b>	Final
<b>Status Date:</b>	01/18/1981
<b>Disposition Details:</b>	CHARGE DISMISSED



## End of Report



**This page is intentionally left blank.**