

## BrokerCheck Report

**SACHA DAVID ZURAWEL**

CRD# 2580945

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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](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).

**SACHA D. ZURAWEL**

CRD# 2580945

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

**IA RBC CAPITAL MARKETS, LLC**  
 100 CRESCENT COURT  
 SUITE 1500  
 DALLAS, TX 75201  
 CRD# 31194  
 Registered with this firm since: 09/02/2011

**B RBC CAPITAL MARKETS, LLC**  
 100 CRESCENT COURT  
 SUITE 1500  
 DALLAS, TX 75201-1871  
 CRD# 31194  
 Registered with this firm since: 08/23/2011

**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:**

- 22 Self-Regulatory Organizations
- 53 U.S. states and territories

**This broker has passed:**

- 2 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 MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED**  
 CRD# 7691  
 DALLAS, TX  
 11/2010 - 08/2011
- B BANC OF AMERICA SECURITIES LLC**  
 CRD# 26091  
 DALLAS, TX  
 02/2009 - 11/2010
- B MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED**  
 CRD# 7691  
 DALLAS, TX  
 04/2000 - 03/2009

**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	2



## 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 22 SROs and is licensed in 53 U.S. states and territories through his or her employer.**

### Employment 1 of 1

Firm Name: **RBC CAPITAL MARKETS, LLC**

Main Office Address: **200 VESEY ST.  
NEW YORK, NY 10281**

Firm CRD#: **31194**

	SRO	Category	Status	Date
B	BOX Exchange LLC	General Securities Principal	Approved	05/11/2012
B	BOX Exchange LLC	General Securities Representative	Approved	05/11/2012
B	Cboe BYX Exchange, Inc.	General Securities Principal	Approved	11/18/2020
B	Cboe BYX Exchange, Inc.	General Securities Representative	Approved	11/18/2020
B	Cboe BZX Exchange, Inc.	General Securities Principal	Approved	11/18/2020
B	Cboe BZX Exchange, Inc.	General Securities Representative	Approved	11/18/2020
B	Cboe C2 Exchange, Inc.	General Securities Representative	Approved	11/18/2020
B	Cboe C2 Exchange, Inc.	General Securities Principal	Approved	07/06/2021
B	Cboe EDGA Exchange, Inc.	General Securities Principal	Approved	11/18/2020
B	Cboe EDGA Exchange, Inc.	General Securities Representative	Approved	11/18/2020
B	Cboe EDGX Exchange, Inc.	General Securities Principal	Approved	11/18/2020
B	Cboe EDGX Exchange, Inc.	General Securities Representative	Approved	11/18/2020
B	Cboe Exchange, Inc.	General Securities Representative	Approved	08/23/2011
B	Cboe Exchange, Inc.	General Securities Principal	Approved	07/06/2021
B	FINRA	General Securities Principal	Approved	08/23/2011

## Broker Qualifications



### Employment 1 of 1, continued

SRO	Category	Status	Date
<b>B</b> FINRA	General Securities Representative	Approved	08/23/2011
<b>B</b> FINRA	Municipal Securities Principal	Approved	08/23/2011
<b>B</b> FINRA	Municipal Securities Representative	Approved	07/06/2021
<b>B</b> Investors' Exchange LLC	General Securities Principal	Approved	11/18/2020
<b>B</b> Investors' Exchange LLC	General Securities Representative	Approved	11/18/2020
<b>B</b> Long-Term Stock Exchange, Inc.	General Securities Principal	Approved	11/02/2020
<b>B</b> Long-Term Stock Exchange, Inc.	General Securities Representative	Approved	11/02/2020
<b>B</b> MEMX LLC	General Securities Principal	Approved	11/01/2020
<b>B</b> MEMX LLC	General Securities Representative	Approved	11/01/2020
<b>B</b> MIAX PEARL, LLC	General Securities Principal	Approved	11/02/2020
<b>B</b> MIAX PEARL, LLC	General Securities Representative	Approved	11/02/2020
<b>B</b> NYSE American LLC	General Securities Principal	Approved	08/23/2011
<b>B</b> NYSE American LLC	General Securities Representative	Approved	08/23/2011
<b>B</b> NYSE American LLC	Municipal Securities Principal	Approved	08/23/2011
<b>B</b> NYSE American LLC	Municipal Securities Representative	Approved	07/06/2021
<b>B</b> NYSE Arca, Inc.	General Securities Principal	Approved	08/23/2011
<b>B</b> NYSE Arca, Inc.	General Securities Representative	Approved	08/23/2011
<b>B</b> NYSE National, Inc.	General Securities Principal	Approved	11/18/2020
<b>B</b> NYSE National, Inc.	General Securities Representative	Approved	11/18/2020
<b>B</b> NYSE National, Inc.	Municipal Securities Principal	Approved	11/18/2020
<b>B</b> NYSE National, Inc.	Municipal Securities Representative	Approved	11/18/2020
<b>B</b> NYSE Texas, Inc.	General Securities Principal	Approved	11/18/2020



## Broker Qualifications

### Employment 1 of 1, continued

SRO	Category	Status	Date
<b>B</b> NYSE Texas, Inc.	General Securities Representative	Approved	11/18/2020
<b>B</b> Nasdaq BX, Inc.	General Securities Principal	Approved	08/23/2011
<b>B</b> Nasdaq BX, Inc.	General Securities Representative	Approved	08/23/2011
<b>B</b> Nasdaq GEMX, LLC	General Securities Principal	Approved	11/18/2020
<b>B</b> Nasdaq GEMX, LLC	General Securities Representative	Approved	11/18/2020
<b>B</b> Nasdaq ISE, LLC	General Securities Principal	Approved	08/23/2011
<b>B</b> Nasdaq ISE, LLC	General Securities Representative	Approved	08/23/2011
<b>B</b> Nasdaq PHLX LLC	General Securities Principal	Approved	08/23/2011
<b>B</b> Nasdaq PHLX LLC	General Securities Representative	Approved	08/23/2011
<b>B</b> Nasdaq Stock Market	General Securities Principal	Approved	08/23/2011
<b>B</b> Nasdaq Stock Market	General Securities Representative	Approved	08/23/2011
<b>B</b> New York Stock Exchange	General Securities Principal	Approved	08/23/2011
<b>B</b> New York Stock Exchange	General Securities Representative	Approved	08/23/2011
<b>B</b> New York Stock Exchange	Municipal Securities Principal	Approved	08/23/2011
<b>B</b> New York Stock Exchange	Municipal Securities Representative	Approved	07/06/2021

U.S. State/ Territory	Category	Status	Date
<b>B</b> Alabama	Agent	Approved	08/23/2011
<b>B</b> Alaska	Agent	Approved	09/06/2011
<b>B</b> Arizona	Agent	Approved	10/24/2011
<b>B</b> Arkansas	Agent	Approved	09/06/2011
<b>B</b> California	Agent	Approved	08/23/2011

## Broker Qualifications



### Employment 1 of 1, continued

	U.S. State/ Territory	Category	Status	Date
B	Colorado	Agent	Approved	10/20/2011
B	Connecticut	Agent	Approved	08/23/2011
B	Delaware	Agent	Approved	08/30/2011
B	District of Columbia	Agent	Approved	08/23/2011
B	Florida	Agent	Approved	08/23/2011
B	Georgia	Agent	Approved	08/23/2011
B	Hawaii	Agent	Approved	03/01/2017
B	Idaho	Agent	Approved	08/23/2011
B	Illinois	Agent	Approved	08/23/2011
B	Indiana	Agent	Approved	08/29/2011
B	Iowa	Agent	Approved	08/23/2011
B	Kansas	Agent	Approved	08/23/2011
B	Kentucky	Agent	Approved	08/23/2011
B	Louisiana	Agent	Approved	08/23/2011
B	Maine	Agent	Approved	08/23/2011
B	Maryland	Agent	Approved	08/23/2011
B	Massachusetts	Agent	Approved	08/25/2011
B	Michigan	Agent	Approved	08/23/2011
B	Minnesota	Agent	Approved	08/23/2011
B	Mississippi	Agent	Approved	08/23/2011
B	Missouri	Agent	Approved	08/23/2011

## Broker Qualifications



### Employment 1 of 1, continued

	U.S. State/ Territory	Category	Status	Date
B	Montana	Agent	Approved	01/09/2017
B	Nebraska	Agent	Approved	07/19/2013
B	Nevada	Agent	Approved	08/23/2011
B	New Hampshire	Agent	Approved	08/23/2011
B	New Jersey	Agent	Approved	01/23/2013
B	New Mexico	Agent	Approved	08/23/2011
B	New York	Agent	Approved	08/23/2011
B	North Carolina	Agent	Approved	08/23/2011
B	North Dakota	Agent	Approved	01/09/2017
B	Ohio	Agent	Approved	08/23/2011
B	Oklahoma	Agent	Approved	09/06/2011
B	Oregon	Agent	Approved	08/23/2011
B	Pennsylvania	Agent	Approved	08/23/2011
B	Puerto Rico	Agent	Approved	08/23/2011
B	Rhode Island	Agent	Approved	08/23/2011
B	South Carolina	Agent	Approved	08/23/2011
B	South Dakota	Agent	Approved	08/23/2011
B	Tennessee	Agent	Approved	08/23/2011
B	Texas	Agent	Approved	08/23/2011
IA	Texas	Investment Adviser Representative	Approved	09/02/2011
B	Utah	Agent	Approved	08/23/2011



## Broker Qualifications



### Employment 1 of 1, continued

	U.S. State/ Territory	Category	Status	Date
B	Vermont	Agent	Approved	01/17/2017
B	Virgin Islands	Agent	Approved	08/23/2011
B	Virginia	Agent	Approved	08/23/2011
B	Washington	Agent	Approved	08/23/2011
B	West Virginia	Agent	Approved	08/23/2011
B	Wisconsin	Agent	Approved	08/23/2011
B	Wyoming	Agent	Approved	08/23/2011

### Branch Office Locations

**RBC CAPITAL MARKETS, LLC**  
100 CRESCENT COURT  
SUITE 1500  
DALLAS, TX 75201-1871

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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. 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 2 principal/supervisory exams, 3 general industry/product exams, and 2 state securities law exams.**

### Principal/Supervisory Exams

Exam	Category	Date
<b>B</b> General Securities Principal Examination	Series 24	12/23/1999
<b>B</b> Municipal Securities Principal Examination	Series 53	12/01/1999

### General Industry/Product Exams

Exam	Category	Date
<b>B</b> Municipal Securities Representative Examination	Series 52TO	01/02/2023
<b>B</b> Securities Industry Essentials Examination	SIE	10/01/2018
<b>B</b> General Securities Representative Examination	Series 7	02/16/1995

### State Securities Law Exams

Exam	Category	Date
<b>B IA</b> Uniform Combined State Law Examination	Series 66	06/27/2002
<b>B</b> Uniform Securities Agent State Law Examination	Series 63	01/23/1995

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/](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 firms:

Registration Dates	Firm Name	CRD#	Branch Location
<b>B</b> 11/2010 - 08/2011	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	7691	DALLAS, TX
<b>B</b> 02/2009 - 11/2010	BANC OF AMERICA SECURITIES LLC	26091	DALLAS, TX
<b>B</b> 04/2000 - 03/2009	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	7691	DALLAS, TX
<b>IA</b> 04/2000 - 03/2009	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	7691	DALLAS, TX
<b>B</b> 02/1995 - 03/2000	CHASE SECURITIES OF TEXAS, INC.	17116	HOUSTON, TX

### 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
08/2011 - Present	RBC CAPITAL MARKETS, LLC	DIRECTOR	Y	DALLAS, TX, 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) COMO INTERESTS, LLC; NON INVESTMENT RELATED; COLLEGE STATION, TX; MATTRESS RETAILER; MANAGING MEMBER; START DATE: 12/15/2010; 2 HOURS DEVOTED PER MONTH, 0 HOURS DURING TRADING HOURS; 50% EQUITY OWNER AND MEMBER OF LLC, WILL NOT BE INVOLVED WITH DAY-TO-DAY OPERATIONS, BUT DO HAVE VETO POWERS FOR MAKING DECISIONS ABOUT THE COMPANY.

2) -Name of Entity: Men of Nehemiah  
Address: 2010 Al Lipscomb Way, Dallas, Texas 75215  
Business Description: non-profit - drug recovery mission  
Business is/is not investment related: is not

## Registration and Employment History



### Other Business Activities, continued

Projected Start Date: 10/25/2024

Capacity: Board Member

Duties Performed: board member duties

Hours Devoted to this OBA: 2

Hours Devoted to this OBA during business hours: 0

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## 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	2	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 1

<b>Reporting Source:</b>	Firm
<b>Employing firm when activities occurred which led to the complaint:</b>	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED
<b>Allegations:</b>	THE CUSTOMER ALLEGES UNSUITABLE INVESTMENT RECOMMENDATIONS, UNAUTHORIZED TRADING AND MISREPRESENTATION AND OMISSION OF MATERIAL FACTS REGARDING AUCTION RATE SECURITIES AND COLLATERALIZED DEBT OBLIGATIONS FROM MAY 2007 TO AUGUST 2007.
<b>Product Type:</b>	Other: AUCTION RATE SECURITIES AND COLLATERALIZED DEBT OBLIGATIONS
<b>Alleged Damages:</b>	\$95,450,000.00
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	No
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	Yes
<b>Arbitration/Reparation forum or court name and location:</b>	FINRA
<b>Docket/Case #:</b>	11-01232
<b>Filing date of arbitration/CFTC reparation or civil litigation:</b>	03/25/2011



## Customer Complaint Information

**Date Complaint Received:** 04/06/2011

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 09/17/2012

**Settlement Amount:** \$52,500,000.00

**Individual Contribution Amount:** \$0.00

**Firm Statement** MERRILL LYNCH AND MR. ZURAWEL BELIEVE THAT ALL INVESTMENTS RECOMMENDED TO THIS CUSTOMER WERE SUITABLE AND WERE CONSISTENT WITH THE INVESTMENT POLICY PROVIDED BY THE CUSTOMER. MERRILL LYNCH AND MR. ZURAWEL ALSO DENY MAKING ANY TRADES WITHOUT AUTHORIZATION AND CONTEND THAT ALL MATERIAL FACTS WERE DISCLOSED TO THE CUSTOMER. MERRILL LYNCH AGREED TO SETTLE THIS MATTER FOR BUSINESS REASONS WITHOUT ANY ADMISSION OF LIABILITY. IN ADDITION, THERE WAS NO FINDING OF LIABILITY OR WRONGDOING ATTRIBUTED TO MR. ZURAWEL, AND HE WAS NOT ASKED TO CONTRIBUTE, AND DID NOT CONTRIBUTE, TO THE SETTLEMENT.

**Reporting Source:** Broker

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

**Allegations:** THE CUSTOMER ALLEGES UNSUITABLE INVESTMENT RECOMMENDATIONS, UNAUTHORIZED TRADING AND MISREPRESENTATION AND OMISSION OF MATERIAL FACTS REGARDING AUCTION RATE SECURITIES AND COLLATERALIZED DEBT OBLIGATIONS FROM MAY 2007 TO AUGUST 2007.

**Product Type:** Other: AUCTION RATE SECURITIES AND COLLATERALIZED DEBT

**Alleged Damages:** \$95,450,000.00

**Is this an oral complaint?** No

**Is this a written complaint?** No

**Is this an arbitration/CFTC reparation or civil litigation?** Yes





**Arbitration/Reparation forum  
or court name and location:** FINRA

**Docket/Case #:** 11-01232

**Filing date of  
arbitration/CFTC reparation  
or civil litigation:** 03/25/2011

### **Customer Complaint Information**

**Date Complaint Received:** 04/06/2011

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 09/17/2012

**Settlement Amount:** \$52,500,000.00

**Individual Contribution  
Amount:** \$0.00

### **Broker Statement**

MERRILL LYNCH AND MR. ZURAWEL BELIEVE THAT ALL INVESTMENTS RECOMMENDED TO THIS CUSTOMER WERE SUITABLE AND WERE CONSISTENT WITH THE INVESTMENT POLICY PROVIDED BY THE CUSTOMER. MERRILL LYNCH AND MR. ZURAWEL ALSO DENY MAKING ANY TRADES WITHOUT AUTHORIZATION AND CONTEND THAT ALL MATERIAL FACTS WERE DISCLOSED TO THE CUSTOMER. MERRILL LYNCH AGREED TO SETTLE THIS MATTER FOR BUSINESS REASONS WITHOUT ANY ADMISSION OF LIABILITY. IN ADDITION, THERE WAS NO FINDING OF LIABILITY OR WRONGDOING ATTRIBUTED TO MR. ZURAWEL, AND HE WAS NOT ASKED TO CONTRIBUTE, AND DID NOT CONTRIBUTE, TO THE SETTLEMENT.



## 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 1

**Reporting Source:** Broker

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

**Allegations:** THE CLIENT ALLEGED THAT MR. ZURAWEL MADE INVESTMENT RECOMMENDATIONS THAT WERE UNSUITABLE AND FAILED TO DISCLOSE THAT THE INVESTMENTS WOULD VIOLATE I2'S STANDARD POLICIES AND PROCEDURES.

**Product Type:** Debt - Corporate

**Alleged Damages:** \$1,500,000.00

### Customer Complaint Information

**Date Complaint Received:** 09/04/2002

**Complaint Pending?** No

**Status:** Closed/No Action

**Status Date:** 04/04/2005

**Settlement Amount:**

**Individual Contribution Amount:**

**Broker Statement**

MERRILL LYNCH RESPONDED IN WRITING TO THE CLIENT AND DENIED ALL ALLEGATIONS IN THEIR ENTIRETY. THE CLIENT HAD THE OPPORTUNITY TO REPLY TO THE FIRM'S RESPONSE. TO DATE, WE HAVE HEARD NOTHING MORE FROM THE CLIENT.

## End of Report



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