

BrokerCheck Report

ABED WILLIAM LULU

CRD# 2625609

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Broker Qualifications	2 - 3
Registration and Employment History	5 - 6
Disclosure Events	7

About BrokerCheck®

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

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

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.

- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

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

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:

- o information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
- o information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

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

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

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

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

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



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

brokercheck.finra.org



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

Thank you for using FINRA BrokerCheck.

ABED W. LULU

CRD# 2625609

This broker is not currently registered.

Report Summary for this Broker



This report summary provides an overview of the broker's professional background and conduct. Additional information can be found in the detailed report.

Broker Qualifications

This broker is not currently registered.

This broker has passed:

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

Registration History

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

- B WORDEN CAPITAL MANAGEMENT LLC**
CRD# 148366
Melville, NY
06/2016 - 08/2016
- B ROCKWELL GLOBAL CAPITAL LLC**
CRD# 142485
MELVILLE, NY
02/2015 - 11/2015
- B LAIDLAW & COMPANY (UK) LTD.**
CRD# 119037
MELVILLE, NY
11/2013 - 02/2015

Disclosure Events

All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

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

The following types of disclosures have been reported:

Type	Count
Regulatory Event	6
Customer Dispute	4
Judgment/Lien	4

Broker Qualifications



Registrations

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

This broker is not currently registered.



Broker Qualifications

Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below.

This individual has passed 0 principal/supervisory exams, 2 general industry/product exams, and 1 state securities law exam.

Principal/Supervisory Exams

Exam	Category	Date
No information reported.		

General Industry/Product Exams

Exam	Category	Date
B Securities Industry Essentials Examination	SIE	08/18/2016
B General Securities Representative Examination	Series 7	05/30/1997

State Securities Law Exams

Exam	Category	Date
B Uniform Securities Agent State Law Examination	Series 63	06/18/1997

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 06/2016 - 08/2016	WORDEN CAPITAL MANAGEMENT LLC	148366	Melville, NY
B 02/2015 - 11/2015	ROCKWELL GLOBAL CAPITAL LLC	142485	MELVILLE, NY
B 11/2013 - 02/2015	LAIDLAW & COMPANY (UK) LTD.	119037	MELVILLE, NY
B 08/2013 - 11/2013	GLOBAL ARENA CAPITAL CORP	16871	MELVILLE, NY
B 05/2012 - 10/2012	B.B. GRAHAM & COMPANY, INC.	41533	MELVILLE, NY
B 01/2011 - 05/2012	LIBERTY PARTNERS FINANCIAL SERVICES, LLC	130390	MELVILLE, NY
B 05/2009 - 01/2011	GLOBAL ARENA CAPITAL CORP	16871	GARDEN CITY, NY
B 12/2007 - 06/2009	CLARK DODGE & CO., INC.	23288	GARDEN CITY, NY
B 07/2006 - 12/2007	NEW CASTLE FINANCIAL SERVICES LLC	102380	MELVILLE, NY
B 11/2004 - 04/2006	BENSON YORK GROUP, INC.	40231	MELVILLE, NY
B 08/2004 - 11/2004	S.W. BACH & COMPANY	43522	PORT WASHINGTON, NY
B 01/2004 - 08/2004	LH ROSS & COMPANY, INC.	37920	BOCA RATON, FL
B 04/2003 - 01/2004	CONTINENTAL BROKER-DEALER CORP.	14048	CARLE PLACE, NY
B 02/2001 - 05/2003	HARRISON SECURITIES, INC.	14103	PORT WASHINGTON, NY
B 04/1999 - 02/2001	TASIN & COMPANY, INC.	30709	HAUPPAUGE, NY
B 03/1999 - 03/1999	TASIN & COMPANY, INC.	30709	
B 02/1999 - 03/1999	CAMBRIDGE CAPITAL, LLC	41464	GARDEN CITY, NY
B 01/1999 - 02/1999	JOSEPH STEVENS & COMPANY, INC.	35459	BROOKLYN, NY
B 10/1998 - 11/1998	SCHNEIDER SECURITIES, INC.	16434	DENVER, CO
B 02/1998 - 10/1998	D.L. CROMWELL INVESTMENTS, INC.	37730	BOCA RATON, FL
B 09/1997 - 02/1998	DUKE & CO., INC.	8035	NEW YORK, NY



Registration and Employment History

Registration History, continued

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
B 07/1997 - 09/1997	ROYCE INVESTMENT GROUP, INC.	10494	WOODBURY, NY
B 06/1997 - 07/1997	RICKEL & ASSOCIATES, INC.	7839	NEW YORK, NY

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
05/2016 - Present	Worden Capital Management LLC	REGISTERED REPRESENTATIVE	Y	MELVILLE, NY, United States
10/2015 - 05/2016	new york rare coins	cold caller	N	holbrook, NY, United States
02/2015 - 10/2015	ROCKWELL GLOBAL CAPITAL LLC	REGISTERED REP	Y	MELVILLE, NY, United States
11/2013 - 02/2015	LAIDLAW AND COMPANY	REGISTERED REPRESENTATIVE	Y	NEW YORK, NY, United States
10/2012 - 11/2013	GLOBAL ARENA CAPITAL CORP	REGISTERED REPRESENTATIVE	Y	MELVILLE, NY, United States
05/2012 - 10/2012	B.B. GRAHAM & CO.	REGISTERED REPRESENTATIVE	Y	ORANGE, CA, United States
01/2011 - 05/2012	LIBERTY PARTNERS FINANCIAL SERVICES	REGISTERED REPRESENTATIVE	Y	BAKERSFIELD, CA, 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.

No information reported.



Disclosure Events

What you should know about reported disclosure events:

1. All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
 - o A law enforcement agency must file formal charges before a broker is required to disclose a particular criminal event.
 - o A customer dispute must involve allegations that a broker engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.
 - o
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - o As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, brokerage firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
 - o
4. **There are different statuses and dispositions for disclosure events:**
 - o A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - § A "pending" event involves allegations that have not been proven or formally adjudicated.
 - § An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - § A "final" event has been concluded and its resolution is not subject to change.
 - o A final event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - § An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - § A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that brokers and brokerage firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - § A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.

For your convenience, below is a matrix of the number and status of disclosure events involving this broker. Further information regarding these events can be found in the subsequent pages of this report. You also may wish to contact the broker to obtain further information regarding these events.

	Pending	Final	On Appeal
Regulatory Event	0	6	0
Customer Dispute	1	3	N/A
Judgment/Lien	4	N/A	N/A



Disclosure Event Details

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

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

Regulatory - Final

This type of disclosure event may involve (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory such as the Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of a broker's authority to act as an attorney, accountant, or federal contractor.

Disclosure 1 of 6

Reporting Source:	Regulator
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	Suspension
Date Initiated:	02/02/2018
Docket/Case Number:	2017055568801
Employing firm when activity occurred which led to the regulatory action:	N/A
Product Type:	No Product
Allegations:	Respondent Lulu failed to respond to FINRA request for information.
Current Status:	Final
Resolution:	Letter
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No



Resolution Date: 05/07/2018

Sanctions Ordered: Bar (Permanent)

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 2

Sanction Type: Bar (Permanent)
Capacities Affected: All capacities
Duration: Indefinite
Start Date: 05/07/2018

End Date:

Sanction 2 of 2

Sanction Type: Suspension
Capacities Affected: All capacities
Duration: n/a
Start Date: 02/26/2018
End Date: 05/06/2018

Regulator Statement

Pursuant to FINRA Rule 9552(h) and in accordance with FINRA's Notice of Suspension and Suspension from Association letters dated February 2, 2018, and February 26, 2018, respectively, on May 7, 2018, Lulu is barred from association with any FINRA member in any capacity. Respondent failed to request termination of his suspension within three months of the date of the Notice of Suspension; therefore, he is automatically barred from association with any FINRA member in any capacity.



Disclosure 2 of 6

Reporting Source:	Regulator
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	Revocation
Date Initiated:	01/24/2017
Docket/Case Number:	2014040347901
Employing firm when activity occurred which led to the regulatory action:	n/a
Product Type:	No Product
Allegations:	Respondent Lulu failed to pay fines and/or costs of \$2,856.38 in FINRA Case #2014040347901.
Current Status:	Final
Resolution:	Letter
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	01/24/2017
Sanctions Ordered:	Revocation
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?

Regulator Statement

Pursuant to FINRA Rule 8320, Respondent Lulu's FINRA registration is revoked as of the close of business on January 24, 2017 for failure to pay fines and/or costs.

Disclosure 3 of 6

Reporting Source: Regulator

Regulatory Action Initiated By: FINRA

Sanction(s) Sought: Other: n/a

Date Initiated: 01/20/2016

Docket/Case Number: [2014040347901](#)

Employing firm when activity occurred which led to the regulatory action: Laidlaw & Co, (UK) LTD; Rockwell Global Capital LLC

Product Type: No Product

Allegations: Without admitting or denying the findings, Lulu consented to the sanctions and to the entry of findings that he failed to timely disclose on his Form U4 that he was the subject of an IRS tax lien in the amount of \$31,518, and a New York State tax lien in the amount of \$3,777. The findings stated that Lulu also provided false information to his member firm by stating on the firm's Annual Compliance Questionnaire that he did not have any judgments or liens against him.



Current Status: Final

Resolution: Acceptance, Waiver & Consent(AWC)

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: 01/20/2016

Sanctions Ordered: Civil and Administrative Penalty(ies)/Fine(s)
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:	three months
Start Date:	02/01/2016
End Date:	04/30/2016



Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$5,000.00

Portion Levied against individual: \$5,000.00

Payment Plan: deferred

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Reporting Source: Broker

Regulatory Action Initiated By: FINRA

Sanction(s) Sought: Suspension

Date Initiated: 01/20/2016

Docket/Case Number: [2014040347901](#)

Employing firm when activity occurred which led to the regulatory action: Laidlaw & Co, (UK) LTD; Rockwell Global Capital LLC

Product Type: No Product

Allegations: Without admitting or denying the findings, Lulu consented to the sanctions and to the entry of findings that he failed to timely disclose on his Form U4 that he was the subject of an IRS tax lien in the amount of \$31,518, and a New York State tax lien in the amount of \$3,777. The findings stated that Lulu also provided false information to his member firm by stating on the firm's Annual Compliance Questionnaire that he did not have any judgments or liens against him.

Current Status: Final

Resolution: Acceptance, Waiver & Consent(AWC)



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:	01/20/2016
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	any capacity
Duration:	three months
Start Date:	02/01/2016
End Date:	04/30/2016
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$5,000.00
Portion Levied against individual:	\$5,000.00
Payment Plan:	deferred
Is Payment Plan Current:	
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	

Disclosure 4 of 6

Reporting Source:	Regulator
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	Suspension



Date Initiated: 08/06/2013

Docket/Case Number: [09-04558](#)

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

Product Type: No Product

Allegations: RESPONDENT LULU 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.

Current Status: Final

Resolution: LETTER

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Resolution Date: 08/06/2013

Sanctions Ordered: Suspension

If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise? No



(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?

(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or



(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Sanction 1 of 1

Sanction Type: Suspension
Capacities Affected: ANY CAPACITY
Duration: N/A
Start Date: 08/06/2013
End Date: 08/09/2013

Regulator Statement

PURSUANT TO ARTICLE VI, SECTION 3 OF FINRA BY-LAWS, AND FINRA RULE 9554, RESPONDENT LULU IS SUSPENDED AUGUST 6, 2013 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. SUSPENSION LIFTED AUGUST 9, 2013.

Reporting Source: Broker
Regulatory Action Initiated By: FINRA
Sanction(s) Sought: Suspension
Date Initiated: 08/06/2013
Docket/Case Number: [09-04558](#)



Employing firm when activity occurred which led to the regulatory action:	GLOBAL ARENA CAPITAL CORP
Product Type:	No Product
Allegations:	RESPONDENT LULU 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
Current Status:	Final
Resolution:	LETTER
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	08/06/2013
Sanctions Ordered:	Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	ALL
Duration:	N/A
Start Date:	08/06/2013
End Date:	08/09/2013

Disclosure 5 of 6

Reporting Source:	Regulator
Regulatory Action Initiated By:	ILLINOIS
Sanction(s) Sought:	Denial
Other Sanction(s) Sought:	
Date Initiated:	07/11/2005



Docket/Case Number: 0500253

Employing firm when activity occurred which led to the regulatory action: BENSON YORK GROUP, INC.

Product Type: Other

Other Product Type(s):

Allegations: RESPONDENTS APPLICATION AS A SALESPERSON IN THE STATE OF ILLINOIS IS SUMMARILY DENIED PURSUANT TO THE PROVISIONS OF SECTION 8.E(1)(K) OF THE ILLINOIS SECURITIES LAW.

Current Status: Final

Resolution: Order

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Resolution Date: 08/12/2005

Sanctions Ordered: Revocation/Expulsion/Denial

Other Sanctions Ordered:

Sanction Details: RESPONDENT'S APPLICATION FOR REGISTRATION AS A SALESPERSON IN THE STATE OF ILLINOIS IS DENIED PURSUANT TO SECTION 8.E(1)(J) OF THE ILLINOIS SECURITIES LAW.

Regulator Statement SUMMARY ORDER OF DENIAL ISSUED AND THE RESPONDENT HAS 30 DAYS TO REQUEST A HEARING. IF NO SUCH REQUEST HAS BEEN MADE, THE ORDER WILL BECOME FINAL. ANY QUESTIONS CALL CHERYL WEISS @ 312-793-3324. ORDER OF DENIAL ISSUED FINAL ORDER.

Reporting Source: Broker

Regulatory Action Initiated By: STATE OF ILLINOIS
SECRETARY OF STATE
SECURITIES DEPARTMENT

Sanction(s) Sought: Denial

Other Sanction(s) Sought:



Date Initiated: 07/11/2005

Docket/Case Number: 0500253

Employing firm when activity occurred which led to the regulatory action: HARRISON SECURITIES, INC

Product Type: Other

Other Product Type(s):

Allegations: RESPONDENTS APPLICATION AS A SALESPERSON IN THE STATE OF ILLINOIS IS SUMMARILY DENIED PURSUANT TO THE PROVISIONS OF SECTION 8.E(1)(K) OF THE ILLINOIS SECURITIES LAW.

Current Status: Final

Resolution: Order

Resolution Date: 07/11/2005

Sanctions Ordered: Revocation/Expulsion/Denial

Other Sanctions Ordered:

Sanction Details: START DATE COMMENCED IMMEDIATELY UPON ISSUANCE (7-11-05). RESPONDENT HAD OPPORTUNITY TO APPEAL WITHIN 30 DAYS OF ORDER BUT ELECTED TO WITHDRAW APPLICATION.

Disclosure 6 of 6

Reporting Source: Regulator

Regulatory Action Initiated By: COLORADO DIVISION OF SECURITIES

Sanction(s) Sought: Other

Other Sanction(s) Sought: THE COLORADO DIVISION OF SECURITIES FILED A NOTICE OF HEARING WITH AN ADMINISTRATIVE LAW JUDGE FOR THE PURPOSE OF DETERMINING WHETHER ANY OF THE SANCTIONS SET FORTH IN 11-51-410(1), CRS (2003) SHOULD BE IMPOSED UPON THE BROKER-DEALER, HARRISON SECURITIES, INC, OR IT'S SALES REPRESENTATIVES; RAYMOND CONNERS, WAYNE KAUFMAN, GREGORY WEISSMAN, JAMES PECORARO, CHAD THOMPSON, ABED LULU, HOWARD BIRNBAUM.

Date Initiated: 02/06/2004



Docket/Case Number: XY 2004-001

Employing firm when activity occurred which led to the regulatory action: HARRISON SECURITIES, INC.

Product Type: Equity - OTC

Other Product Type(s):

Allegations: UNSUITABLE TRADING UNAUTHORIZED TRADING, UNFAIR AND DISHONEST DEALINGS, SECURITIES FRAUD, AND FAILURE TO SUPERVISE.

Current Status: Final

Resolution: Consent

Resolution Date: 10/13/2004

Sanctions Ordered: Suspension

Other Sanctions Ordered:

Sanction Details: MR. LULU WAS SUSPENDED IN COLORADO FROM NOV. 1, 2004 TO NOV. 19, 2004.

Regulator Statement THE COLORADO DIVISION OF SECURITIES FILED A NOTICE OF HEARING WITH AN ADMINISTRATIVE LAW JUDGE FOR THE PURPOSE OF DETERMINING WHETHER ANY OF THE SANCTIONS SET FORTH IN 11-51-410(1), CRS (2003) SHOULD BE IMPOSED UPON THE BROKER-DEALER, HARRISON SECURITIES, INC, OR IT'S SALES REPRESENTATIVES; RAYMOND CONNERS, WAYNE KAUFMAN, GREGORY WEISSMAN, JAMES PECORARO, CHAD THOMPSON, ABED LULU, HOWARD BIRNBAUM.

Reporting Source: Broker

Regulatory Action Initiated By: COLORADO DIVISION OF SECURITIES

Sanction(s) Sought: Other

Other Sanction(s) Sought: THE COLORADO DIVISION SECURITIES FILED A NOTICE OF HEARING WITH AN ADMINISTRATIVE LAW JUDGE FOR THE PURPOSE OF DETERMINING WHETHER ANY SANCTIONS SET FOR THIS 11-51-410(1)CDS 2003 SHOULD BE IMPOSED UPON HARRISON SECURITIES INC OR ITS SALE REPRESENTATIVES, RAYMOND CONNERS, WAYNE KAUFMAN, GREGORY WEISSMAN, JAMES PECORARO, CHAD THOMPSON, ABED LULU AND HOWARD BIRNBAUM.



Date Initiated: 02/06/2004

Docket/Case Number: XY2004-001

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

Product Type: Equity - OTC

Other Product Type(s):

Allegations: UNSUITABLE TRADING, UNAUTHORIZED TRADING, UNFAIR AND DISHONEST DEALINGS, SECURITIES FRAUD AND FAILURE TO SUPERVISE.

Current Status: Final

Resolution: Consent

Resolution Date: 10/13/2004

Sanctions Ordered: Suspension

Other Sanctions Ordered:

Sanction Details: MR. LULU WAS SUSPENDED IN COLORADO FROM NOV. 1, 2004 TO NOV. 19, 2004

Broker Statement I HAD NO INVOLVEMENT IN THE TRANSACTIONS FOR THE SUBJECT ACCOUNT AND MERELY OPENED THE ACCOUNT AND MADE THE INITIAL TRADE WHICH WAS AUTHORIZED. KEITH CONNOLLY, ANOTHER HARRISON SECURITIES INC. SALES REPRESENTATIVE, EXECUTED THE SUBJECTS TRADE. THE COLORADO DIVISION OF SECURITIES HAS OFFERED A SETTLEMENT OF A 3 YEAR SUSPENSION. I AM CONTINUING SETTLEMENT DISCUSSIONS TO REDUCE THE THERM OF THE SUSPENSION OFFER.



Customer Dispute - Settled

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

Disclosure 1 of 1

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Laidlaw and Company (UK) Ltd.
Allegations:	Client alleges unsuitability and excessive trading from 2014 to 2015.
Product Type:	Equity-OTC Equity Listed (Common & Preferred Stock)
Alleged Damages:	\$55,189.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	17-02227
Date Notice/Process Served:	08/28/2017
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	10/17/2017
Monetary Compensation Amount:	\$23,000.00
Individual Contribution Amount:	\$0.00



Customer Dispute - Closed-No Action / Withdrawn / Dismissed / Denied

This type of disclosure event involves (1) a consumer-initiated, investment-related arbitration or civil suit containing allegations of sales practice violations against the individual broker that was dismissed, withdrawn, or denied; or (2) a consumer-initiated, investment-related written complaint containing allegations that the broker engaged in sales practice violations resulting in compensatory damages of at least \$5,000, forgery, theft, or misappropriation, or conversion of funds or securities, which was closed without action, withdrawn, or denied.

Disclosure 1 of 2

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	GLOBAL ARENA CAPITAL
Allegations:	PURCHASE OF ARENA COAL AND JAMES RIVER COAL UNAUTHORIZED
Product Type:	Equity-OTC
Alleged Damages:	\$6,000.00
Is this an oral complaint?	No
Is this a written complaint?	Yes
Is this an arbitration/CFTC reparation or civil litigation?	No

Customer Complaint Information

Date Complaint Received:	12/20/2012
Complaint Pending?	No
Status:	Closed/No Action
Status Date:	10/24/2014
Settlement Amount:	
Individual Contribution Amount:	

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	GLOBAL ARENA CAPITAL CORP
Allegations:	PURCHASE OF ARENA COAL AND JAMES RIVER COAL UNAUTHORIZED
Product Type:	Equity-OTC



Alleged Damages: \$6,000.00

Is this an oral complaint? No

Is this a written complaint? Yes

**Is this an arbitration/CFTC
reparation or civil litigation?** No

Customer Complaint Information

Date Complaint Received: 12/20/2012

Complaint Pending? No

Status: Closed/No Action

Status Date: 10/24/2014

Settlement Amount:

**Individual Contribution
Amount:**

Disclosure 2 of 2

Reporting Source: Firm

**Employing firm when
activities occurred which led
to the complaint:** CONTINENTAL BROKER DEALER CORP

Allegations: ALLEGATIONS OF EXCESSIVE COMMISSIONS, ACTIVITY DATE 05/29/2003

Product Type: Other

Alleged Damages: \$35,000.00

Customer Complaint Information

Date Complaint Received: 01/28/2004

Complaint Pending? No

Status: Denied

Status Date: 02/03/2004

Settlement Amount:

**Individual Contribution
Amount:**



Firm Statement CLIENT SENT WRITTEN COMPLAINT SUBSEQUENT TO A VERBAL COMPLAINT WHICH SETTLED ON 6/19/2003 FOR \$2000.00

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: CONTINENTAL BROKER DEALER

Allegations: THE CUSTOMER'S ALLEGE THAT FROM APRIL THROUGH DECEMBER 2003 MR. LULU & MR. CONNOLLY ENGAGED IN UNAUTHORIZED TRADING & CHURNING WHICH RESULTED IN LOSSES OF \$35000.00. CUSTOMER'S SIGNED A RELEASE DATED 7/19/2003 DISCHARGING MR. CONNOLLY & MR. LULU & CONTINENTAL BROKER DEALER CORP FROM ANY AND ALL LIABILITIES WITH RESPECT TO THEIR COMPLAINT IN EXCHANGE FOR A SETTLEMENT OF \$2000. THE CUSTOMER COMPLAINT WAS FILED AFTER THE DATE OF THE RELEASE AND ALTHOUGH THE COMPLAINT INCLUDED THE PERIOD OF TIME INCLUDED IN THE RELEASE. IT ALSO COVERS APPROXIMATELY 6 MONTHS AFTER THE RELEASE. IT IS UNCLEAR WHY THE CUSTOMER'S FILED A COMPLAINT DEALING WITH THE SAME MATTER FROM WHICH I WAS PREVIOUSLY RELEASED.

Product Type: Equity - OTC

Alleged Damages: \$35,000.00

Customer Complaint Information

Date Complaint Received: 01/28/2004

Complaint Pending? No

Status: Denied

Status Date: 02/03/2004

Settlement Amount:

Individual Contribution Amount:

Broker Statement CUSTOMER SUBMITTED WRITTEN COMPLAINT AFTER SETTLING VERBAL COMPLAINT FOR \$2000.00. COMPLAINT DENIED, UPDATING STATUS DATE TO REFLECT STATUS DATE ON U5.



Customer Dispute - Pending

This type of disclosure event involves (1) a pending consumer-initiated, investment-related arbitration or civil suit that contains allegations of sales practice violations against the broker; or (2) a pending, consumer-initiated, investment-related written complaint containing allegations that the broker engaged in, sales practice violations resulting in compensatory damages of at least \$5,000, forgery, theft, or misappropriation, or conversion of funds or securities.

Disclosure 1 of 1

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: D.L. CROMWELL INVESTMENT, INC.

Allegations: MISREPRESENTATION

Product Type: Equity - OTC

Alleged Damages: \$29,000.00

Customer Complaint Information

Date Complaint Received: 07/16/2001

Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: DL CROMWELL

Allegations: UNSUITABILITY

Product Type: Equity - OTC

Alleged Damages: \$45,000.00

Customer Complaint Information

Date Complaint Received: 07/16/2001

Complaint Pending? Yes

Settlement Amount:

Individual Contribution



Amount:



Judgment / Lien

This type of disclosure event involves an unsatisfied and outstanding judgments or liens against the broker.

Disclosure 1 of 4

Reporting Source:	Broker
Judgment/Lien Holder:	STATE OF NEW YORK
Judgment/Lien Amount:	\$3,777.00
Judgment/Lien Type:	Tax
Date Filed with Court:	05/14/2012
Date Individual Learned:	11/14/2013
Type of Court:	State Court
Name of Court:	NEW YORK STATE
Location of Court:	NASSAU, NEW YORK
Docket/Case #:	E005431446W0046
Judgment/Lien Outstanding?	Yes

Disclosure 2 of 4

Reporting Source:	Broker
Judgment/Lien Holder:	INTERNAL REVENUE SERVICE
Judgment/Lien Amount:	\$31,518.00
Judgment/Lien Type:	Tax
Date Filed with Court:	10/01/2013
Date Individual Learned:	11/14/2013
Type of Court:	Federal Court
Name of Court:	INTERNAL REVENUE SERVICE
Location of Court:	NASSAU COUNTY, NY
Docket/Case #:	FT151464
Judgment/Lien Outstanding?	Yes

Disclosure 3 of 4



Reporting Source: Broker
Judgment/Lien Holder: MICHAEL PHELAN / LH ROSS & COMPANY
Judgment/Lien Amount: \$28,725.00
Judgment/Lien Type: Civil
Date Filed with Court: 06/11/2012
Type of Court: State Court
Name of Court: SUPREME COURT OF THE STATE OF NEW YORK
Location of Court: NASSAU COUNTY, NEW YORK
Docket/Case #: 12-007417
Judgment/Lien Outstanding? Yes

Disclosure 4 of 4

Reporting Source: Broker
Judgment/Lien Holder: CONTINENTAL BROKER-DEALER CORP.
Judgment/Lien Amount: \$10,060.00
Judgment/Lien Type: Civil
Date Filed with Court: 05/03/2004
Court Details: DISTRICT COURT OF THE COUNTY OF NASSAU
 FIRST DISTRICT, CIVIL PART
 NEW YORK, NY
 USA
 INDEX #: 10531/04
Judgment/Lien Outstanding? Yes

End of Report



This page is intentionally left blank.