

BrokerCheck Report

TODD DOUGLAS RYMAN

CRD# 2648270

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Broker Qualifications	2 - 4
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.

**TODD D. RYMAN**

CRD# 2648270

Currently employed by and registered with the following Firm(s):**SUNTRUST INVESTMENT SERVICES, INC.**1155 PEACHTREE STREET, NE
SUITE 800

ATLANTA, GA 30309

CRD# 17499

Registered with this firm since: 02/14/2017

SUNTRUST INVESTMENT SERVICES, INC.

2734 MEADOW CHURCH ROAD

DULUTH, GA 30097

CRD# 17499

Registered with this firm since: 02/14/2017

SUNTRUST INVESTMENT SERVICES, INC.

2171 PLEASANT HILL ROAD

DULUTH, GA 30096

CRD# 17499

Registered with this firm since: 02/14/2017

Report Summary for this Broker

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

Broker Qualifications**This broker is registered with:**

- 1 Self-Regulatory Organization
- 13 U.S. states and territories

This broker has passed:

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

Registration History**This broker was previously registered with the following securities firm(s):****RAYMOND JAMES & ASSOCIATES, INC.**

CRD# 705

Atlanta, GA

09/2016 - 02/2017

DEUTSCHE BANK SECURITIES INC.

CRD# 2525

ATLANTA, GA

05/2011 - 09/2016

MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED

CRD# 7691

ATLANTA, GA

10/2009 - 05/2011

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	1
Customer Dispute	7

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

This individual is currently registered with 1 SRO and is licensed in 13 U.S. states and territories through his or her employer.

Employment 1 of 1

Firm Name: **SUNTRUST INVESTMENT SERVICES, INC.**
 Main Office Address: **303 PEACHTREE CENTER AVE
 SUITE 140
 ATLANTA, GA 30303**
 Firm CRD#: **17499**

SRO	Category	Status	Date
FINRA	General Securities Representative	APPROVED	02/14/2017

U.S. State/ Territory	Category	Status	Date	U.S. State/ Territory	Category	Status	Date
California	Agent	APPROVED	02/15/2017	Tennessee	Agent	APPROVED	05/02/2017
District of Columbia	Agent	APPROVED	02/28/2017				
Georgia	Agent	APPROVED	04/10/2017				
Idaho	Agent	APPROVED	02/15/2017				
Iowa	Agent	APPROVED	02/27/2017				
Louisiana	Agent	APPROVED	04/12/2017				
Maryland	Agent	APPROVED	02/21/2017				
New York	Agent	APPROVED	06/07/2017				
North Carolina	Agent	APPROVED	05/12/2017				
Ohio	Agent	APPROVED	02/15/2017				
Pennsylvania	Agent	APPROVED	02/15/2017				
South Carolina	Agent	APPROVED	04/13/2017				



Broker Qualifications

Employment 1 of 1, continued

Branch Office Locations

SUNTRUST INVESTMENT SERVICES, INC.
1155 PEACHTREE STREET, NE
SUITE 800
ATLANTA, GA 30309

SUNTRUST INVESTMENT SERVICES, INC.
2171 PLEASANT HILL ROAD
DULUTH, GA 30096

SUNTRUST INVESTMENT SERVICES, INC.
2734 MEADOW CHURCH ROAD
DULUTH, GA 30097



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 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
No information reported.		

General Industry/Product Exams

Exam	Category	Date
Securities Industry Essentials Examination	SIE	10/01/2018
General Securities Representative Examination	Series 7	08/23/1995

State Securities Law Exams

Exam	Category	Date
Uniform Investment Adviser Law Examination	Series 65	08/20/2003
Uniform Securities Agent State Law Examination	Series 63	09/25/1995

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/.



Registration and Employment History

Registration History

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
09/2016 - 02/2017	RAYMOND JAMES & ASSOCIATES, INC.	705	Atlanta, GA
05/2011 - 09/2016	DEUTSCHE BANK SECURITIES INC.	2525	ATLANTA, GA
10/2009 - 05/2011	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	7691	ATLANTA, GA
10/2002 - 10/2009	BANC OF AMERICA INVESTMENT SERVICES, INC.	16361	ATLANTA, GA
07/1998 - 10/2002	UBS PAINWEBBER INC.	8174	WEEHAWKEN, NJ
02/1996 - 07/1998	JOSEPHTHAL & CO., INC.	3227	NEW YORK, NY
08/1995 - 02/1996	BEAR, STEARNS & CO. INC.	79	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 Dates	Employer Name	Employer Location
02/2017 - Present	SUNTRUST ADVISORY SERVICES	ATLANTA, GA
02/2017 - Present	SUNTRUST INVESTMENT SERVICES	ATLANTA, GA
09/2016 - 02/2017	RAYMOND JAMES & ASSOCIATES, INC.	Atlanta, GA
05/2011 - 09/2016	DEUTSCHE BANK SECURITIES INC.	ATLANTA, GA
02/2010 - 05/2011	BANK OF AMERICA, NA	ATLANTA, GA
10/2009 - 05/2011	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	ATLANTA, GA
10/2002 - 05/2011	BANC OF AMERICA INSURANCE SERVICES, INC.	ATLANTA, GA
10/2002 - 10/2009	BANC OF AMERICA INVESTMENT SERVICES, INC.	ATLANTA, GA

Registration and Employment History



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.

RYMAN FAMILY HOLDINGS LLC

POSITION: Secretary NATURE: Rick Warren Real Estate INVESTMENT RELATED: No NUMBER OF HOURS: 0

SECURITIES TRADING HOURS: 0 START DATE: 02/23/2018

ADDRESS: , Duluth GA , United States

DESCRIPTION: Ryman Family Holdings LLC sole purpose will be as owner of personal IRA assets investing in Rick Warren RE.



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	1	0



Customer Dispute	0	7	N/A
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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 1

Reporting Source:	Broker
Regulatory Action Initiated By:	COMMISSIONER OF INSURANCE FOR THE STATE OF GEORGIA
Sanction(s) Sought:	
Other Sanction(s) Sought:	
Date Initiated:	03/31/2000
Docket/Case Number:	99-1159
Employing firm when activity occurred which led to the regulatory action:	PAINWEBBER INCORPORATED
Product Type:	Insurance
Other Product Type(s):	
Allegations:	BY A CONSENT ORDER DATED APRIL 25, 2000, THE COMMISSIONER OF INSURANCE OF THE STATE OF GEORGIA FINED MR. RYMAN \$500 FOR FAILURE TO DISCLOSE CERTAIN CRIMINAL OFFENSES ON HIS INSURANCE LICENSE APPLICATION IN 1998. MR. RYMAN DID VOLUNTARILY DISCLOSE THESE MATTERS ON HIS INSURANCE RENEWAL APPLICATION IN 2000. HE HAS EXPLAINED THAT THE OMISSION ON THE ORIGINAL APPLICATION WAS THE INADVERTENT RESULT OF HIS FAILURE TO READ THE APPLICATION



FORM ACCURATELY.

Current Status:

Final

Resolution:

Consent

Resolution Date:

04/25/2000

Sanctions Ordered:

Monetary/Fine \$500.00

Other Sanctions Ordered:

Sanction Details:

THE COMMISSIONER OF INSURANCE OF THE STATE OF GEORGIA FINED MR. RYMAN \$500 FOR FAILURE TO DISCLOSE CERTAIN CRIMINAL OFFENSES ON HIS INSURANCE LICENSE APPLICATION IN 1998.



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 6

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Deutsche Bank Securities Inc. ("DBSI")
Allegations:	Claimants allege that, from on or around May 2011 through September 2016, Mr. Ryman implemented an unsuitable "borrow to invest" strategy and invested the proceeds on a discretionary basis, and that he failed to disclose to Claimants material facts about their accounts and investments.
Product Type:	Equity Listed (Common & Preferred Stock)
Alleged Damages:	\$0.00
Alleged Damages Amount Explanation (if amount not exact):	Unspecified damages. Claimants "estimate the compensatory damages to be under \$1 million".

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	17-01988
Date Notice/Process Served:	08/09/2017
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	05/14/2018
Monetary Compensation Amount:	\$30,000.00
Individual Contribution Amount:	\$0.00

Reporting Source:	Firm
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Employing firm when activities occurred which led to the complaint: Raymond James & Associates, Inc.

Allegations: Client alleges: Unsuitable Recommendations, Unsuitable Investment Strategy, Enhanced Commissions, Failure to Disclose Material Facts, Breach of Contract and Fraud. Date of Activity is: 9/04/2016 through 8/15/2017.

Product Type: Other: Not Specified

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): Unspecified dollar amount by client - firm estimates in excess of \$5,000 - less than \$1,000,000.

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA - New York

Docket/Case #: 17-01988

Date Notice/Process Served: 08/09/2017

Arbitration Pending? No

Disposition: Settled

Disposition Date: 05/14/2018

Monetary Compensation Amount: \$30,000.00

Individual Contribution Amount: \$0.00

Firm Statement Deutsche Bank will pay Claimants \$30,000. RJA did not contribute to the settlement amount and will be dismissed from the matter with prejudice.

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: DEUTSCHE BANK SECURITIES [DBSI]

Allegations: DOCUMENTATION DATE OF ACTIVITY 09/06/2016-02/13/2017

Product Type: Equity Listed (Common & Preferred Stock)



Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): UNSPECIFIED DAMAGES. CLAIMIANTS ESTIMATE THE COMPENSATORY DAMAGES TO BE UNDER \$1 MILLION.

Is this an oral complaint? No

Is this a written complaint? Yes

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

Arbitration/Reparation forum or court name and location: NEW YORK

Docket/Case #:

Filing date of arbitration/CFTC reparation or civil litigation:

Customer Complaint Information

Date Complaint Received: 08/16/2017

Complaint Pending? No

Status: Denied

Status Date: 09/08/2017

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA

Docket/Case #: 17-01988

Date Notice/Process Served: 08/09/2017

Arbitration Pending? No

Disposition: Settled

Disposition Date: 05/14/2018



Monetary Compensation Amount: \$30,000.00

Individual Contribution Amount: \$0.00

Broker Statement

Customer made a frivolous claim that his account value was lower than he thought after I left Raymond James to go to work at SunTrust. In all actuality his wife had spent a very large amount money on a monthly basis than he accounted for, thus making his balances lower than he thought. Through discovery, after the complaint was filed, the customer realized that no funds had been misappropriated at all and the lower balances were accurate given the large amounts of monies that were withdrawn by his bookkeeper on his wife's behalf. Also through this discovery the firms and the client realized that his accounts had performed very well over the 10 years he had accounts managed by me. Once all of this accounting was made available to him the client decided to settle the complaint for \$30,000 w/Deutsche Bank to wrap up the issue. I was not party to this decision by Deutsche Bank nor was I asked to contribute any money to the settlement. I was told it was their (DB) decision to offer the award to avoid further legal costs. We considered trying to have this incident expunged, and initially motioned for it due to unwarranted complaint from my record, but due to legal costs, hearings, etc. I decided to just let it stand.

DEUTSCHE BANK WILL PAY CLAIMANTS 30,000. RJA DID NOT CONTRIBUTE TO SETTLEMENT AMOUNT AND WILL BE DISMISSED FROM THE MATTER WITH PREJUDICE.

Disclosure 2 of 6

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: Deutsche Bank Securities Inc. ("DBSI")

Allegations: Client alleges that the Client Advisor sold the client an unsuitable Private Equity fund.

Product Type: Other: Private Security

Alleged Damages: \$250,000.00

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: 11/21/2016
Complaint Pending? No
Status: Settled
Status Date: 05/22/2017
Settlement Amount: \$205,193.00
Individual Contribution Amount: \$0.00

Reporting Source: Broker
Employing firm when activities occurred which led to the complaint: Deutsche Bank Securities Inc. ("DBSI")
Allegations: Client alleges that the Client Advisor sold the client an unsuitable Private Equity fund.
Product Type: Other: Private Security
Alleged Damages: \$250,000.00
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: 11/21/2016
Complaint Pending? No
Status: Settled
Status Date: 06/22/2017
Settlement Amount: \$205,193.00
Individual Contribution Amount: \$0.00

Broker Statement I was not a party to the settlement. I also did not contribute ANY funds to the settlement. Client had a gain in the investment not a loss. He simply had no



liquidity and DB would not assist him in finding liquidity nor a amicable solution that met the client's needs. Client felt he no other options than to complain. During the education of the PE fund, representatives from DB never disclosed to Advisors that clients could not have liquidity if they were to become terminally ill or die. If this has been disclosed I would never had recommended investment.

Disclosure 3 of 6

Reporting Source:	Firm
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.
Product Type:	Equity Listed (Common & Preferred Stock)
Alleged Damages:	\$100,000.00
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 #:	14-02095
Filing date of arbitration/CFTC reparation or civil litigation:	06/27/2014

Customer Complaint Information

Date Complaint Received:	07/17/2014
Complaint Pending?	No
Status:	Settled
Status Date:	05/07/2015
Settlement Amount:	\$47,500.00



Individual Contribution Amount: \$0.00

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.

Product Type: Equity Listed (Common & Preferred Stock)

Alleged Damages: \$100,000.00

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 #: 14-02095

Filing date of arbitration/CFTC reparation or civil litigation: 06/27/2014

Customer Complaint Information

Date Complaint Received: 07/17/2014

Complaint Pending? No

Status: Settled

Status Date: 05/07/2015

Settlement Amount: \$47,500.00

Individual Contribution Amount: \$0.00



Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: BANC OF AMERICA INVESTMENT SERVICES, INC.

Allegations: UNAUTHORIZED TRADING

Product Type: Other: AUCTION RATE SECURITIES - CORPORATE DEBT

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): UNSPECIFIED

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: 06/09/2009

Complaint Pending? No

Status: Settled

Status Date: 06/09/2009

Settlement Amount: \$5,000,000.00

Individual Contribution Amount: \$0.00

Broker Statement

THIS MATTER INVOLVES THE SALE OF AUCTION RATE SECURITIES (ARS). THE TRANSACTION(S) AT ISSUE TOOK PLACE BEFORE MID-FEBRUARY 2008, WHEN THE ARS MARKET SUFFERED WIDESPREAD AUCTION FAILURES AND ILLIQUIDITY. THE FINANCIAL ADVISOR DID NOT CAUSE, CONTRIBUTE OR HAVE ANY CONTROL WHATSOEVER OVER THESE MARKET EVENTS. THE FIRM REACHED AGREEMENT WITH CERTAIN OF ITS REGULATORS, PURSUANT TO WHICH IT REPURCHASED ARS FOR THEIR FULL PAR VALUE FROM CERTAIN CLIENTS, INCLUDING THE INSTANT CLIENT, WHERE THEY COMPLAINED OR NOT. THE FINANCIAL ADVISOR WAS NOT A PARTY TO THAT AGREEMENT, DID NOT MAKE ANY PAYMENT TO THE CLIENT, AND WAS NOT ASKED TO AND DID NOT CONTRIBUTE TO THE REPURCHASE AMOUNT. THE SETTLEMENT AMOUNT IN ITEM 11 ABOVE



REFLECTS THE PAR VALUE OF THE REPURCHASED ARS, AS REQUIRED BY FINRA REGULATORY NOTICE 09-12.

Disclosure 5 of 6

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	BANC OF AMERICA INVESTMENT SERVICES, INC.
Allegations:	FAILURE TO FOLLOW INSTRUCTIONS
Product Type:	Other: AUCTIONS RATE SECURITIES - MUNICIPAL DEBT
Alleged Damages:	\$0.00
Alleged Damages Amount Explanation (if amount not exact):	UNSPECIFIED
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:	06/09/2009
Complaint Pending?	No
Status:	Settled
Status Date:	06/09/2009
Settlement Amount:	\$2,550,000.00
Individual Contribution Amount:	\$0.00

Broker Statement THIS MATTER INVOLVES THE SALE OF AUCTION RATE SECURITIES (ARS). THE TRANSACTION(S) AT ISSUE TOOK PLACE BEFORE MID-FEBRUARY 2008, WHEN THE ARS MARKET SUFFERED WIDESPREAD AUCTION FAILURES AND ILLIQUIDITY. THE FINANCIAL ADVISOR DID NOT CAUSE, CONTRIBUTE OR HAVE ANY CONTROL WHATSOEVER OVER THESE MARKET EVENTS. THE FIRM REACHED AGREEMENT WITH CERTAIN OF ITS REGULATORS, PURSUANT TO WHICH IT REPURCHASED ARS FOR THEIR



FULL PAR VALUE FROM CERTAIN CLIENTS, INCLUDING THE INSTANT CLIENT, WHERE THEY COMPLAINED OR NOT. THE FINANCIAL ADVISOR WAS NOT A PARTY TO THAT AGREEMENT, DID NOT MAKE ANY PAYMENT TO THE CLIENT, AND WAS NOT ASKED TO AND DID NOT CONTRIBUTE TO THE REPURCHASE AMOUNT. THE SETTLEMENT AMOUNT IN ITEM 11 ABOVE REFLECTS THE PAR VALUE OF THE REPURCHASED ARS, AS REQUIRED BY FINRA REGULATORY NOTICE 09-12.

Disclosure 6 of 6

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	BANC OF AMERICA INVESTMENT SERVICES, INC.
Allegations:	THE CUSTOMER ALLEGED FAILURE TO FOLLOW INSTRUCTIONS IN JANUARY 2008 AND MISREPRESENTATION AND OMISSION OF MATERIAL FACTS.
Product Type:	Equity Listed (Common & Preferred Stock)
Alleged Damages:	\$100,000.00
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 #:	12-04327
Filing date of arbitration/CFTC reparation or civil litigation:	12/18/2012

Customer Complaint Information

Date Complaint Received:	01/08/2013
Complaint Pending?	No
Status:	Settled
Status Date:	05/15/2013
Settlement Amount:	\$25,000.00



Individual Contribution Amount: \$0.00

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: BANC OF AMERICA INVESTMENT SERVICES, INC.

Allegations: THE CUSTOMER ALLEGES FAILURE TO FOLLOW INSTRUCTIONS IN JANUARY 2008 AND MISREPRESENTATION AND OMISSION OF MATERIAL FACTS.

Product Type: Equity Listed (Common & Preferred Stock)

Alleged Damages: \$100,000.00

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 #: 12-04327

Filing date of arbitration/CFTC reparation or civil litigation: 12/18/2012

Customer Complaint Information

Date Complaint Received: 01/08/2013

Complaint Pending? No

Status: Settled

Status Date: 05/15/2013

Settlement Amount: \$25,000.00

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 1

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: RAYMOND JAMES & ASSOCIATES, INC.

Allegations: CLIENT ALLEGES DOCUMENTATION. DATE OF ACTIVITY IS 9/06/2016 THROUGH 2/13/2017.

Product Type: Equity Listed (Common & Preferred Stock)
Mutual Fund
Other: REITS, EQUITY-FOREIGN, ETFs, CLOSED-END FUNDS

Alleged Damages: \$300,000.00

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: 02/15/2017

Complaint Pending? No

Status: Denied

Status Date: 06/08/2017

Settlement Amount:

Individual Contribution Amount:

Reporting Source: Broker



Employing firm when activities occurred which led to the complaint: Raymond James

Allegations: Documentation Date of activity 9/6/2016-2/13/2017

Product Type: Equity Listed (Common & Preferred Stock)
Mutual Fund
Other: REIT, Equity Foreign, CEF

Alleged Damages: \$300,000.00

Is this an oral complaint? No

Is this a written complaint? Yes

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

Arbitration/Reparation forum or court name and location: NEW YORK

Docket/Case #:

Filing date of arbitration/CFTC reparation or civil litigation:

Customer Complaint Information

Date Complaint Received: 08/16/2017

Complaint Pending? No

Status: Denied

Status Date: 09/08/2017

Settlement Amount:

Individual Contribution Amount:

Broker Statement I am unaware of the Documentation issue referenced in the complaint. It was filed after my resignation with Raymond James and I have not been provided with a copy of the complaint.

End of Report



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