

## BrokerCheck Report

### MARC AUGUSTUS REDA

CRD# 2757330

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Please be aware that fraudsters may link to BrokerCheck from phishing and similar scam websites, trying to steal your personal information or your money. Make sure you know who you're dealing with when investing, and contact FINRA with any concerns.

For more information read our [investor alert](#) on imposters.

## About BrokerCheck®

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

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

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

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

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

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

- 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](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)

**Thank you for using FINRA BrokerCheck.**

**MARC A. REDA**

CRD# 2757330

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

- B** **SPARTAN CAPITAL SECURITIES, LLC**  
 45 BROADWAY  
 19TH FLOOR  
 NEW YORK, NY 10006  
 CRD# 146251  
 Registered with this firm since: 05/12/2016

**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
- 10 U.S. states and territories

**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** **FIRST STANDARD FINANCIAL COMPANY LLC**  
 CRD# 168340  
 STATEN ISLAND, NY  
 02/2016 - 05/2016
- B** **PHX FINANCIAL, INC.**  
 CRD# 144403  
 NEW YORK, NY  
 10/2014 - 01/2016
- B** **LIDLAW & COMPANY (UK) LTD.**  
 CRD# 119037  
 NEW YORK, NY  
 11/2013 - 10/2014

**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	2
Criminal	1
Customer Dispute	12
Termination	2
Financial	1
Judgment/Lien	1



## 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 10 U.S. states and territories through his or her employer.**

### Employment 1 of 1

Firm Name: **SPARTAN CAPITAL SECURITIES, LLC**

Main Office Address: **45 BROADWAY  
19TH FLOOR  
NEW YORK, NY 10006**

Firm CRD#: **146251**

SRO	Category	Status	Date
<b>B</b> FINRA	Corporate Securities Represent	APPROVED	05/12/2016

U.S. State/ Territory	Category	Status	Date
<b>B</b> Arizona	Agent	APPROVED	04/26/2017
<b>B</b> Connecticut	Agent	APPROVED	06/27/2016
<b>B</b> Georgia	Agent	APPROVED	10/17/2016
<b>B</b> Indiana	Agent	APPROVED	08/11/2016
<b>B</b> Iowa	Agent	APPROVED	07/15/2016
<b>B</b> Minnesota	Agent	APPROVED	07/14/2016
<b>B</b> New York	Agent	APPROVED	06/08/2016
<b>B</b> Oklahoma	Agent	APPROVED	08/16/2016
<b>B</b> Pennsylvania	Agent	APPROVED	06/21/2016
<b>B</b> Texas	Agent	APPROVED	11/02/2017

### Branch Office Locations

## Broker Qualifications



**Employment 1 of 1, continued**  
**SPARTAN CAPITAL SECURITIES, LLC**  
45 BROADWAY  
19TH FLOOR  
NEW YORK, NY 10006

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## Broker Qualifications

### Industry Exams this Broker has Passed

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

**This individual has passed 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>B</b> Securities Industry Essentials Examination	SIE	10/01/2018
<b>B</b> Corporate Securities Limited Representative Examination	Series 62	10/11/1999

### State Securities Law Exams

Exam	Category	Date
<b>B</b> Uniform Securities Agent State Law Examination	Series 63	10/22/1999

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 02/2016 - 05/2016	FIRST STANDARD FINANCIAL COMPANY LLC	168340	STATEN ISLAND, NY
B 10/2014 - 01/2016	PHX FINANCIAL, INC.	144403	NEW YORK, NY
B 11/2013 - 10/2014	LAIDLAW & COMPANY (UK) LTD.	119037	NEW YORK, NY
B 05/2013 - 11/2013	CLARK DODGE & CO., INC.	23288	NEW YORK, NY
B 06/2010 - 05/2013	JOHN THOMAS FINANCIAL	40982	NEW YORK, NY
B 01/2008 - 07/2010	PRESTIGE FINANCIAL CENTER, INC.	30407	NEW YORK, NY
B 01/2004 - 02/2008	NATIONAL SECURITIES CORPORATION	7569	NEW YORK, NY
B 08/2003 - 02/2004	CLARK STREET CAPITAL, INC.	38304	LEVITTOWN, NY
B 02/2003 - 08/2003	PARKER FINANCIAL CORP.	42140	VALLEY COTTAGE, NY
B 02/2002 - 01/2003	JOSEPH STEVENS & COMPANY, INC.	35459	BROOKLYN, NY
B 11/2001 - 02/2002	JOSEPH GUNNAR & CO. LLC	24795	NEW YORK, NY
B 04/2001 - 10/2001	INVESTPRIVATE, INC.	103737	NEW YORK, NY
B 02/2000 - 03/2001	BLUESTONE CAPITAL SECURITIES, INC.	36189	NEW YORK, NY
B 10/1999 - 02/2000	DALTON KENT SECURITIES GROUP, INC.	38813	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	Spartan Capital Securities, LLC.	Registered Representative	Y	New York, NY, United States





## Registration and Employment History

### Employment History, continued

Employment	Employer Name	Position	Investment Related	Employer Location
02/2016 - 04/2016	First Standard Financial Company	Registered Representative	Y	New York, NY, United States
10/2014 - 01/2016	PHX FIANANCIAL INC.	REGISTERED REPRESENTATIVE	Y	NEW YORK, NY, United States
11/2013 - 10/2014	LAIDLAW AND COMPANY	REGISTERED REP	Y	NEW YORK, NY, United States
05/2013 - 11/2013	CLARKE DODGE	REGISTERED REPRESENTATIVE	Y	NEW YORK, NY, United States
06/2010 - 05/2013	JOHN THOMAS FINANCIAL	REGISTERED REPRESENTATIVE	Y	NYC, NY, 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	1	1	0
Criminal	0	1	0
Customer Dispute	1	11	N/A
Termination	N/A	2	N/A
Financial	1	0	N/A



Judgment/Lien	1	N/A	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

<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	FINRA
<b>Sanction(s) Sought:</b>	
<b>Date Initiated:</b>	06/02/2017
<b>Docket/Case Number:</b>	<a href="#">2016048486601</a>
<b>Employing firm when activity occurred which led to the regulatory action:</b>	PHX Financial, Inc.
<b>Product Type:</b>	Other: Unspecified securities
<b>Allegations:</b>	Without admitting or denying the findings, Reda consented to the sanctions and to the entry of findings that he exercised discretion in customers' accounts without written authorization from the customers and without having obtained his member firm's approval to treat those accounts as discretionary. The findings stated that Reda failed to timely disclose on his Form U4 a federal tax lien filed against him in the amount of \$575,101.
<b>Current Status:</b>	Final
<b>Resolution:</b>	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:**

06/02/2017

**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**

<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	All capacities
<b>Duration:</b>	three months
<b>Start Date:</b>	07/03/2017
<b>End Date:</b>	10/02/2017



### 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:**

**Is Payment Plan Current:**

**Date Paid by individual:** 12/21/2017

**Was any portion of penalty waived?** No

**Amount Waived:**

**Regulator Statement** Fines paid in full on December 21, 2017.

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**Reporting Source:** Broker

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:** Suspension

**Date Initiated:** 06/02/2017

**Docket/Case Number:** [2016048486601](#)

**Employing firm when activity occurred which led to the regulatory action:** PHX Financial, Inc.

**Product Type:** No Product

**Allegations:** Alleged use of price and time discretion and without written authorization and untimely filing of an IRS lien.

**Current Status:** Final

**Resolution:** Acceptance, Waiver & Consent(AWC)



<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	06/02/2017
<b>Sanctions Ordered:</b>	Civil and Administrative Penalty(ies)/Fine(s) Suspension
<b>Sanction 1 of 1</b>	
<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	All Capacities
<b>Duration:</b>	Three months
<b>Start Date:</b>	06/03/2017
<b>End Date:</b>	10/02/2017
<b>Monetary Sanction 1 of 1</b>	
<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$5,000.00
<b>Portion Levied against individual:</b>	\$5,000.00
<b>Payment Plan:</b>	Installment Plan of \$500.00 per month
<b>Is Payment Plan Current:</b>	Yes
<b>Date Paid by individual:</b>	
<b>Was any portion of penalty waived?</b>	No
<b>Amount Waived:</b>	
<b>Broker Statement</b>	Applicant accepted the AWC in order to avoid costly legal fees. All trades were authorized and the U4 filing was completed shortly after being fully aware of the lien.





## Regulatory - Pending

This type of disclosure event involves a pending formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory agency such as the Securities and Exchange Commission, foreign financial regulatory body) for alleged violations of investment-related rules or regulations.

### Disclosure 1 of 1

**Reporting Source:** Regulator

**Regulatory Action Initiated By:** FINRA

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

**Date Initiated:** 06/15/2021

**Docket/Case Number:** [2019063526901](#)

**Employing firm when activity occurred which led to the regulatory action:** Spartan Capital Securities, LLC

**Product Type:** Other: Unspecified Securities

**Allegations:** Reda was named a respondent in a FINRA complaint alleging that he willfully violated Section 10(b) of the Securities Exchange Act of 1934 and Exchange Act Rule 10b-5 and violated FINRA Rule 2020 by churning in customer accounts. The complaint alleges that Reda exercised de facto control of the trading in, and made the trading decisions for, 19 customers' accounts. The customers relied on Reda to make securities recommendations and consistently followed his recommendations. Reda also exercised control in instances when he made unauthorized transactions in the customer accounts. The complaint also alleges that Reda recommended securities transactions in the customers' accounts that were excessive and quantitatively unsuitable for each of the customers in light of their investment profiles. In excessively trading the customers' accounts, Reda maximized his own financial benefit at the expense of his customers, generating costs of \$264,734 and causing realized losses of \$232,043 on accounts with an aggregate average monthly account value of \$262,234. While the investment profiles of the customers varied, none of the customers agreed to trade in such a way that would deplete their accounts with little hope of making a profit, while also enriching Reda. The complaint further alleges that Reda had no reasonable basis to believe that the investment strategy he recommended to his customers was, in light of the cumulative costs, suitable. Reda recommended his costly active trading strategy to his customers without understanding the potential risks and rewards, failed to consider the effect of the strategy's costs on his customers' ability to generate a profit and did not conduct any research or analysis, or seek any guidance, on whether his strategy could be profitable given the cumulative costs incurred through the implementation of his strategy. Reda did not understand what cost-to-



equity ratios and turnover rates were and consequently failed to consider and calculate these metrics when recommending and executing his active trading investment strategy in his customers' accounts. In addition, the complaint alleges that although Reda had an obligation to know his customers prior to recommending a securities transaction or strategy to them, he recommended both a speculative investment strategy and, to implement that strategy, recommended speculative securities transactions to three customers without a reasonable basis to believe the recommended strategy and individual securities transactions were suitable for those customers based on their investment profiles, including their investment objectives of balanced growth or growth. As it relates to the three customers, Reda was unaware of their investment objectives, risk tolerances, and other information identified in their new account forms prior to making his recommendations to them. Moreover, the complaint alleges that Reda executed transactions in six customers' nondiscretionary accounts without their prior authorization or consent. Furthermore, the complaint alleges that when executing buy transactions in 22 customers' accounts using the proceeds of sale transactions three days earlier, Reda charged excessive commissions. Reda intentionally waited three days to execute the buy transactions to circumvent his member firm's supervisory review of commissions of more than five percent on proceeds transactions. The commissions Reda charged were excessive, unfair, and unreasonable taking into consideration all relevant circumstances, including that he did not disclose to his customers, prior to effecting the transactions, that he would charge such high commissions. The complaint alleges that Reda willfully failed to disclose customer complaints alleging sales practice violations on his Uniform Application for Securities Industry Registration or Transfer (Form U4) and also willfully failed to timely amend his Form U4 to disclose an unsatisfied tax lien and an unsatisfied tax warrant.

**Current Status:** Pending

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**Reporting Source:** Broker

**Regulatory Action Initiated By:** FINRA

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

**Date Initiated:** 06/15/2021

**Docket/Case Number:** [2019063526901](#)

**Employing firm when activity occurred which led to the regulatory action:** Spartan Capital Securities, LLC

**Product Type:**

Other: Unspecified Securities

**Allegations:**

Reda was named a respondent in a FINRA complaint alleging that he willfully violated Section 10(b) of the Securities Exchange Act of 1934 and Exchange Act Rule 10b-5 and violated FINRA Rule 2020 by churning in customer accounts. The complaint alleges that Reda exercised de facto control of the trading in, and made the trading decisions for, 19 customers' accounts. The customers relied on Reda to make securities recommendations and consistently followed his recommendations. Reda also exercised control in instances when he made unauthorized transactions in the customer accounts. The complaint also alleges that Reda recommended securities transactions in the customers' accounts that were excessive and quantitatively unsuitable for each of the customers in light of their investment profiles. In excessively trading the customers' accounts, Reda maximized his own financial benefit at the expense of his customers, generating costs of \$264,734 and causing realized losses of \$232,043 on accounts with an aggregate average monthly account value of \$262,234. While the investment profiles of the customers varied, none of the customers agreed to trade in such a way that would deplete their accounts with little hope of making a profit, while also enriching Reda. The complaint further alleges that Reda had no reasonable basis to believe that the investment strategy he recommended to his customers was, in light of the cumulative costs, suitable. Reda recommended his costly active trading strategy to his customers without understanding the potential risks and rewards, failed to consider the effect of the strategy's costs on his customers' ability to generate a profit and did not conduct any research or analysis, or seek any guidance, on whether his strategy could be profitable given the cumulative costs incurred through the implementation of his strategy. Reda did not understand what cost-to-equity ratios and turnover rates were and consequently failed to consider and calculate these metrics when recommending and executing his active trading investment strategy in his customers' accounts. In addition, the complaint alleges that although Reda had an obligation to know his customers prior to recommending a securities transaction or strategy to them, he recommended both a speculative investment strategy and, to implement that strategy, recommended speculative securities transactions to three customers without a reasonable basis to believe the recommended strategy and individual securities transactions were suitable for those customers based on their investment profiles, including their investment objectives of balanced growth or growth. As it relates to the three customers, Reda was unaware of their investment objectives, risk tolerances, and other information identified in their new account forms prior to making his recommendations to them. Moreover, the complaint alleges that Reda executed transactions in six customers' nondiscretionary accounts without their prior authorization or consent. Furthermore, the complaint alleges that when executing buy transactions in 22 customers' accounts using the proceeds of sale transactions three days earlier, Reda charged excessive commissions. Reda intentionally waited three days to execute the buy transactions to circumvent his member firm's supervisory review of commissions of more than five percent on



proceeds transactions. The commissions Reda charged were excessive, unfair, and unreasonable taking into consideration all relevant circumstances, including that he did not disclose to his customers, prior to effecting the transactions, that he would charge such high commissions. The complaint alleges that Reda willfully failed to disclose customer complaints alleging sales practice violations on his Uniform Application for Securities Industry Registration or Transfer (Form U4) and also willfully failed to timely amend his Form U4 to disclose an unsatisfied tax lien and an unsatisfied tax warrant.

**Current Status:**

Pending



## Criminal - Final Disposition

This type of disclosure event involves a criminal charge against the broker that has resulted in a conviction, acquittal, dismissal, or plea. The criminal matter may pertain to any felony or certain misdemeanor offenses, including bribery, perjury, forgery, counterfeiting, extortion, fraud, and wrongful taking of property.

### Disclosure 1 of 1

<b>Reporting Source:</b>	Broker
<b>Court Details:</b>	SUPERIOR COURNT OF NJ UNION COUNTY CRANFORD TWP., 8 SPRINGFIELD AVENUE, CRANFORD, NJ IND./ACCUS./COMPL.# W20010000722003 & W20010000712003
<b>Charge Date:</b>	02/25/2001
<b>Charge Details:</b>	CHARGED WITH POSS. OF STERIODS; POSS. OF MARIJUANA; INTENT TO DISTRIBUTE STEROIDS; INTENT TO DISTRIBUTE IN SCHOOL DISTRICT. FELONY; NO PLEA ENTERED
<b>Felony?</b>	Yes
<b>Current Status:</b>	Final
<b>Status Date:</b>	01/14/2002
<b>Disposition Details:</b>	THE ABOVE SUBJECT WAS ENTERED INTO THE PTI PROGRAM IN UNION COUNTY, NJ FOR 12 MONTHS, STARTING ON 6/21/2001 AND COMPLETING ON 6/21/2002. THE CHARGES WERE NOT INDICTABLE OFFENSES BUT WERE CONSIDERED COMPLAINTS. THE SUBJECT IS NOT CONVICTED OF THESE CHARGES; RATHER, HIS CASE WAS DIVERTED TO THE PTI PROGRAM. UPON SUCCESSFUL COMPLETION OF THIS PROGRAM THE CHARGES WILL BE DROPPED AND THE SUBJECTS RECORD WILL BE EXPUNGED AFTER SUCCESSFUL COMPLETION OF PROGRAM.
<b>Broker Statement</b>	MR. REDA WAS VERY COOPERATIVE DURING THE INVESTIGATION AND THERE WAS NO INDICATION THAT THESE ITEMS WERE GOING TO BE SOLD. MR. REDA WAS PLACED INTO THE PTI PROGRAM AND ON JANRUARY 11, 2002 WAS GIVEN EARLY DISMISSAL FROM THE PTI PROGRAM.



## Customer Dispute - Award / Judgment

This type of disclosure event involves a final, consumer-initiated, investment-related arbitration or civil suit containing allegations of sales practice violations against the broker that resulted in an arbitration award or civil judgment for the customer.

### Disclosure 1 of 1

<b>Reporting Source:</b>	Regulator
<b>Employing firm when activities occurred which led to the complaint:</b>	Spartan Capital Securities, LLC
<b>Allegations:</b>	Reda was a subject of the customer's complaint against his member firm that asserted the following causes of action: unauthorized trading and churning.
<b>Product Type:</b>	Other: Unspecified securities
<b>Alleged Damages:</b>	\$16,020.00
<b>Arbitration Information</b>	
<b>Arbitration/Reparation Claim filed with and Docket/Case No.:</b>	<a href="#">FINRA - CASE #18-04117</a>
<b>Date Notice/Process Served:</b>	12/04/2018
<b>Arbitration Pending?</b>	No
<b>Disposition:</b>	Award
<b>Disposition Date:</b>	06/27/2019
<b>Disposition Detail:</b>	Reda was a Subject Of the customer's complaint alleging he and his member firm caused sales practice violations. Reda's member firm is liable for and shall pay to the Claimant \$15,381.44, plus interest, in compensatory damages and is liable for and shall pay to Claimant \$425.00 to reimburse Claimant for the filing fee.

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<b>Reporting Source:</b>	Broker
<b>Employing firm when activities occurred which led to the complaint:</b>	Spartan Capital Securities, LLC
<b>Allegations:</b>	Allegations of churning and unauthorized trading
<b>Product Type:</b>	Equity Listed (Common & Preferred Stock)
<b>Alleged Damages:</b>	\$17,620.00
<b>Is this an oral complaint?</b>	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 #:** 18-04117  
**Filing date of  
 arbitration/CFTC reparation  
 or civil litigation:** 03/08/2019

### Customer Complaint Information

**Date Complaint Received:** 04/10/2019  
**Complaint Pending?** No  
**Status:** Arbitration Award/Monetary Judgment (for claimants/plaintiffs)  
**Status Date:** 06/27/2019  
**Settlement Amount:** \$16,020.00  
**Individual Contribution  
 Amount:** \$0.00  
**Broker Statement** Rep strongly denies these allegations. Customer was an active and knowledgeable participant in the decision making and authorized each and every transaction in account.



## 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 8

<b>Reporting Source:</b>	Firm
<b>Employing firm when activities occurred which led to the complaint:</b>	PHX Financial Inc.
<b>Allegations:</b>	Inappropriate management of [Customer's] account by his broker at the time, Mr. Reda while charging excessive commissions.
<b>Product Type:</b>	Equity-OTC Other: ETF
<b>Alleged Damages:</b>	\$74,232.60
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	Yes
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	No

### Customer Complaint Information

<b>Date Complaint Received:</b>	08/11/2017
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	08/31/2017
<b>Settlement Amount:</b>	\$45,000.00
<b>Individual Contribution Amount:</b>	\$0.00

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<b>Reporting Source:</b>	Broker
<b>Employing firm when activities occurred which led to the complaint:</b>	PHX Financial, Inc.
<b>Allegations:</b>	Inappropriate management of [REDACTED] account by his broker at the time, Mr. Reda while charging excessive commissions.





<b>Product Type:</b>	Equity-OTC Other: ETF
<b>Alleged Damages:</b>	\$74,232.60
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	Yes
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	No

### Customer Complaint Information

<b>Date Complaint Received:</b>	07/11/2017
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	08/31/2017
<b>Settlement Amount:</b>	\$45,000.00
<b>Individual Contribution Amount:</b>	\$0.00

**Broker Statement** Mr. Reda left PHX in January 2016. 20 months after leaving PHX the customer filed the alleged complaint. Mr. Reda was never notified about the complaint by PHX. Mr. Reda denies any and all allegations of the complaint.

### Disclosure 2 of 8

<b>Reporting Source:</b>	Firm
<b>Employing firm when activities occurred which led to the complaint:</b>	PHX Financial inc.
<b>Allegations:</b>	Breach of Fiduciary duty, Unsuitable recommendations.
<b>Product Type:</b>	Equity Listed (Common & Preferred Stock)
<b>Alleged Damages:</b>	\$100,000.00
<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



**Arbitration/Reparation forum or court name and location:** FINRA dispute resolution One liberty Plaza, 165 Broadway, NY, NY, 10006

**Docket/Case #:** 16-01461

**Filing date of arbitration/CFTC reparation or civil litigation:** 05/23/2016

### Customer Complaint Information

**Date Complaint Received:** 05/31/2016

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 07/13/2016

**Settlement Amount:** \$26,000.00

**Individual Contribution Amount:** \$0.00

**Reporting Source:** Broker

**Employing firm when activities occurred which led to the complaint:** PHX Financial

**Allegations:** Breach of Fiduciary Duty, Unsuitable recommendations

**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 #:** 16-01461

**Filing date of arbitration/CFTC reparation or civil litigation:** 05/23/2016



## Customer Complaint Information

<b>Date Complaint Received:</b>	06/29/2016
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	07/13/2016
<b>Settlement Amount:</b>	\$26,000.00
<b>Individual Contribution Amount:</b>	\$0.00
<b>Broker Statement</b>	On Sept 19 2016 FINRA notified Mr. Reda the claimant dismissed Mr. Reda with prejudice in the matter and Mr. Reda has been removed as an active party to this arbitration.

## Disclosure 3 of 8

<b>Reporting Source:</b>	Firm
<b>Employing firm when activities occurred which led to the complaint:</b>	PHX Financial inc.
<b>Allegations:</b>	Client alleged unauthorized trading and breach of fiduciary responsibility.
<b>Product Type:</b>	Equity-OTC Equity Listed (Common & Preferred Stock)
<b>Alleged Damages:</b>	\$580,000.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	Losses assessed though a combination of realized and unrealized losses.
<b>Is this an oral complaint?</b>	Yes
<b>Is this a written complaint?</b>	No
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	No

## Customer Complaint Information

<b>Date Complaint Received:</b>	04/15/2016
<b>Complaint Pending?</b>	No



**Status:** Settled  
**Status Date:** 05/23/2016  
**Settlement Amount:** \$85,000.00  
**Individual Contribution Amount:** \$0.00

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**Reporting Source:** Broker  
**Employing firm when activities occurred which led to the complaint:** PHX Financial Inc.  
**Allegations:** Client Alleged unauthorized trading and breach of fiduciary duty.  
**Product Type:** Equity-OTC  
 Equity Listed (Common & Preferred Stock)  
**Alleged Damages:** \$580,000.00  
**Alleged Damages Amount Explanation (if amount not exact):** Losses assessed through a combination of realized and unrealized losses.  
**Is this an oral complaint?** Yes  
**Is this a written complaint?** No  
**Is this an arbitration/CFTC reparation or civil litigation?** No

### Customer Complaint Information

**Date Complaint Received:** 04/15/2016  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:** 05/23/2016  
**Settlement Amount:** \$85,000.00  
**Individual Contribution Amount:** \$0.00

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### Disclosure 4 of 8



**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** Phonix Financial Services

**Allegations:** Client alleged that his broker did not place two stop loss orders as had been agreed on 10/08/2015 and 11/12/2015. The investment declined in value. With no Stop losses in place the client incurred losses.

**Product Type:** Equity-OTC  
Equity Listed (Common & Preferred Stock)

**Alleged Damages:** \$31,250.00

**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:** 03/17/2016

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 04/05/2016

**Settlement Amount:** \$14,800.00

**Individual Contribution Amount:** \$0.00

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**Reporting Source:** Broker

**Employing firm when activities occurred which led to the complaint:** Phoenix Financial Services

**Allegations:** Client alleged that his broker did not place two stop loss orders as agreed on 10/08/2015 and 11/12/2015 resulting in losses.

**Product Type:** Equity-OTC  
Equity Listed (Common & Preferred Stock)

**Alleged Damages:** \$31,250.00



**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:** 03/17/2016  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:** 04/05/2016  
**Settlement Amount:** \$14,800.00  
**Individual Contribution  
Amount:** \$0.00

### Disclosure 5 of 8

**Reporting Source:** Firm  
**Employing firm when  
activities occurred which led  
to the complaint:** Phoenix Financial Services

**Allegations:** [Customer] stated in an email forwarded to compliance that with regard to his accounts beginning in November of 2015 there was failure by his broker to follow instructions, there were unauthorized trades, poor communication and overconcentration of investments.

**Product Type:** Equity-OTC  
Equity Listed (Common & Preferred Stock)

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

**Alleged Damages Amount  
Explanation (if amount not  
exact):** Mr. Solomon had stated that he wanted full compensation for his losses in his IRA and Individual accounts.

**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:** 03/15/2016  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:** 06/06/2016  
**Settlement Amount:** \$112,500.00  
**Individual Contribution Amount:** \$0.00

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**Reporting Source:** Broker  
**Employing firm when activities occurred which led to the complaint:** Phoenix Financial Services

**Allegations:** Client stated in an email forwarded to compliance that beginning in November of 2015, there was failure by his broker to follow instructions, unauthorized trades, poor communication and over concentration of investments in his accounts.

**Product Type:** Equity-OTC  
 Equity Listed (Common & Preferred Stock)

**Alleged Damages:** \$0.00

**Alleged Damages Amount Explanation (if amount not exact):** Client has not alleged a specific monetary amount.

**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:** 03/15/2016  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:** 06/06/2016



**Settlement Amount:** \$112,500.00  
**Individual Contribution Amount:** \$0.00

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#### Disclosure 6 of 8

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** Phoenix Financial Services

**Allegations:** [Customer] contacted the firm and stated to the firm that certain transactions executed shortly after opening her account on April 30th of 2015 were unauthorized.

**Product Type:** Equity-OTC  
Equity Listed (Common & Preferred Stock)

**Alleged Damages:** \$400,000.00

**Is this an oral complaint?** Yes

**Is this a written complaint?** No

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

#### Customer Complaint Information

**Date Complaint Received:** 01/21/2016

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 02/09/2016

**Settlement Amount:** \$120,000.00

**Individual Contribution Amount:** \$0.00

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**Reporting Source:** Broker

**Employing firm when activities occurred which led to the complaint:** Phoenix Financial Services





<b>Allegations:</b>	Client contacted the firm and stated to the firm that certain transactions executed shortly after opening her account on April 30th of 2015 were unauthorized.
<b>Product Type:</b>	Equity-OTC Equity Listed (Common & Preferred Stock)
<b>Alleged Damages:</b>	\$400,000.00
<b>Is this an oral complaint?</b>	Yes
<b>Is this a written complaint?</b>	No
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	No

### Customer Complaint Information

<b>Date Complaint Received:</b>	01/21/2016
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	02/09/2016
<b>Settlement Amount:</b>	\$120,000.00
<b>Individual Contribution Amount:</b>	\$0.00

### Disclosure 7 of 8

<b>Reporting Source:</b>	Firm
<b>Employing firm when activities occurred which led to the complaint:</b>	CLARK STREET CAPITAL
<b>Allegations:</b>	CUSTOMER CLAIMS UNAUTHORIZED SALE OF PENN OCTANE SHARES
<b>Product Type:</b>	Equity - OTC
<b>Alleged Damages:</b>	\$14,000.00

### Customer Complaint Information

<b>Date Complaint Received:</b>	03/01/2004
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	06/18/2004



**Settlement Amount:** \$14,000.00

**Individual Contribution Amount:** \$0.00

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**Reporting Source:** Broker

**Employing firm when activities occurred which led to the complaint:** CLARK STREET CAPITAL

**Allegations:** CUSTOMER CLAIMS UNAUTHORIZED SALE OF PENN OCTANE SHARES.

**Product Type:** Equity - OTC

**Alleged Damages:** \$14,000.00

### Customer Complaint Information

**Date Complaint Received:** 03/01/2004

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 06/18/2004

**Settlement Amount:** \$14,000.00

**Individual Contribution Amount:** \$0.00

**Broker Statement** THIS FILING BY CLARKE STREET CAPITAL IS AN ERROR! I HAVE NEVER HAD THIS INDIVIDUAL/COMPANY AS A CLIENT. I HAVE NEVER BOUGHT OR SOLD SHARES IN PENN OCTANE FOR ANY CLIENT IN MY ENTIRE CAREER. I WAS NEVER CONTACTED BY ANYONE FROM CLARK STREET CAPITAL WITH RESPECT TO THIS MATTER. ALL OF THE ALLEGATIONS ARE FALSE, AND UNFOUNDED.

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### Disclosure 8 of 8

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** DALTON KENT SECURITIES GROUP, INC.

**Allegations:** THAT REDA SOLD A SECURITY IN THE CUSTOMER ACCOUNT AND PURCHASED ANOTHER SECURITY WITHOUT THE CUSTOMER'S



AUTHORIZATION.

**Product Type:** Equity - OTC**Alleged Damages:** \$13,487.31**Customer Complaint Information****Date Complaint Received:** 01/29/2000**Complaint Pending?** No**Status:** Settled**Status Date:** 01/31/2000**Settlement Amount:** \$13,487.31**Individual Contribution Amount:** \$13,487.31**Reporting Source:** Broker**Employing firm when activities occurred which led to the complaint:** DALTON KENT SECURITIES GROUP, INC.**Allegations:** THE CLIENT ALLEGED THAT MR. REDA SOLD A SECURITY IN HIS ACCOUNT AND PURCHASED ANOTHER SECURITY WITHOUT AUTHORIZATION. THE FOLLOWING DAY [CUSTOMER] WROTE A LETTER RECINDING HIS COMPLAINT AGAINST MR. REDA ON FEBRUARY 1, 2000.**Product Type:** Equity - OTC**Alleged Damages:** \$13,487.31**Customer Complaint Information****Date Complaint Received:** 01/29/2000**Complaint Pending?** No**Status:** Settled**Status Date:** 02/01/2001**Settlement Amount:** \$13,487.31**Individual Contribution Amount:** \$13,487.31**Broker Statement** THERE WAS NEVER A CUSTOMER COMPLAINT FILED BY [CUSTOMER].



THIS COMPLAINT WAS CLEARLY A MISUNDERSTANDING. [CUSTOMER] HAD WRITTEN A LETTER STATING THE FACT THAT THERE WAS NO UNAUTHORIZED TRADE THAT HAD TAKEN PLACE. ALL ALLEGATIONS ARE FALSE. DALTON KENT IS OUT OF BUSINESS THEREFORE EXPUNGEMENT OF THIS MATTER WILL BE PURSUED THROUGH CIVIL COURT.



## 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

<b>Reporting Source:</b>	Broker
<b>Employing firm when activities occurred which led to the complaint:</b>	PHX Financial, Inc.
<b>Allegations:</b>	On July 28, 2015 [customer] forwarded an email to his broker Marc Reda stating he did not authorize the purchase of ALRM which were purchased in two blocks of 5000 shares on July 24th and July 27th of 2015.
<b>Product Type:</b>	Equity-OTC
<b>Alleged Damages:</b>	\$0.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	No monetary amount was alleged.
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	Yes
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	No

### Customer Complaint Information

<b>Date Complaint Received:</b>	07/28/2015
<b>Complaint Pending?</b>	No
<b>Status:</b>	Withdrawn
<b>Status Date:</b>	11/11/2015
<b>Settlement Amount:</b>	
<b>Individual Contribution Amount:</b>	
<b>Broker Statement</b>	My client, [customer] authorized the transaction as this was a misunderstanding which [customer] later admitted. This is evidenced by the fact that he invested additional stock in the same company ALRM shortly after his email. [customer]



continues to be my client in good standing.

## Disclosure 2 of 2

<b>Reporting Source:</b>	Broker
<b>Employing firm when activities occurred which led to the complaint:</b>	PHX Financial, Inc.
<b>Allegations:</b>	On August 21 of 2015 an Email from [customer] was sent to Phoenix financials operations department. The email stated to give a [third party] decision making authorization over [customer's] account. It additionally alleged Mr. Reda was trading without authorization.
<b>Product Type:</b>	Equity-OTC
<b>Alleged Damages:</b>	\$0.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	No monetary amount was provided.
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	Yes
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	No
<b>Customer Complaint Information</b>	
<b>Date Complaint Received:</b>	08/21/2015
<b>Complaint Pending?</b>	No
<b>Status:</b>	Withdrawn
<b>Status Date:</b>	08/28/2015
<b>Settlement Amount:</b>	
<b>Individual Contribution Amount:</b>	
<b>Broker Statement</b>	These allegations are false, the email referenced in this complaint did not come from my client [customer]. It came from an unauthorized third party, [third party], who used [customer's] email and forged his signature on a limited trading authority form. This was confirmed by My client



## 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

<b>Reporting Source:</b>	Broker
<b>Employing firm when activities occurred which led to the complaint:</b>	Spartan Capital Securities, LLC
<b>Allegations:</b>	Time Frame: No time frame mentioned/associated with individual claimant in Statement of Claim (SOC). Allegations: Alleging misrepresentation and unsuitable recommendations
<b>Product Type:</b>	No Product
<b>Alleged Damages:</b>	\$72,026.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	Alleged damages: No Investment product mentioned to support the alleged damages in Statement of Claim (SOC).
<b>Arbitration Information</b>	
<b>Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):</b>	FINRA
<b>Docket/Case #:</b>	19-03740
<b>Date Notice/Process Served:</b>	01/28/2020
<b>Arbitration Pending?</b>	Yes
<b>Broker Statement</b>	The Claims were filed by Cold Spring Advisory - Non-Attorney Representatives (NARS). NARS have no ethical code or constraints like attorneys do, and do not face potential sanctions from any regulatory or licensing body like a state bar association. Essentially, this system exposes the investor potential victimization, with little chance of recovering damages caused by an unscrupulous or negligent NAR." The NARs are specifically attuned to the FINRA guidance and have weaponized the FINRA reporting requirements against individuals such as applicant, by making totally baseless, unfounded, unsupportable, and factually false allegations against them and are being permitted to do so with no regard for the investor or the applicant.



## Employment Separation After Allegations

This type of disclosure event involves a situation where the broker voluntarily resigned, was discharged, or was permitted to resign after being accused of (1) violating investment-related statutes, regulations, rules or industry standards of conduct; (2) fraud or the wrongful taking of property; or (3) failure to supervise in connection with investment-related statutes, regulations, rules, or industry standards of conduct.

### Disclosure 1 of 2

**Reporting Source:** Firm  
**Employer Name:** PHX Financial, inc.  
**Termination Type:** Permitted to Resign  
**Termination Date:** 01/25/2016  
**Allegations:** Violation of firm cell phone policy.  
**Product Type:** Equity Listed (Common & Preferred Stock)

**Reporting Source:** Broker  
**Employer Name:** PHX Financial, Inc.  
**Termination Type:** Permitted to Resign  
**Termination Date:** 01/25/2016  
**Allegations:** Violation of firm cell phone policy  
**Product Type:** Equity Listed (Common & Preferred Stock)

### Disclosure 2 of 2

**Reporting Source:** Firm  
**Employer Name:** INVESTPRIVATE  
**Termination Type:** Voluntary Resignation  
**Termination Date:** 10/08/2001  
**Allegations:** CUSTOMER SAID HE HAD A STANDING ORDER TO SELL TO LIMIT LOSS.  
 CUST COMPLAINT WAS DENIED BY FIRM  
**Product Type:** Equity - OTC  
**Other Product Types:**

**Reporting Source:** Broker





**Employer Name:** INVESTPRIVATE

**Termination Type:** Voluntary Resignation

**Termination Date:** 10/08/2001

**Allegations:** CUSTOMER SAID HE HAD A STANDING ORDER TO SELL TO LIMIT LOSS.  
CUST COMPLAINT WAS DENIED BY FIRM

**Product Type:** Equity - OTC

**Other Product Types:**

**Broker Statement** I WAS NEVER TERMINATED. I VOLUNTARILY RESIGNED AND WAS NEVER INFORMED OF ANY ALLEGATION OR COMPLAINT PERTAINING TO THE FILING OF THIS OUTRAGEOUS AMENDMENT. THERE WAS NEVER AN ALLEGATION OR COMPLAINT WHILE EMPLOYED WITH INVESTPRIVATE. I INTEND TO FOLLOW UP & REMOVE SUCH ALLEGATIONS.



## Financial - Pending

This type of disclosure event involves a pending bankruptcy, compromise with one or more creditors, or Securities Investor Protection Corporation liquidation involving the broker or an organization/brokerage firm the broker controlled that occurred within the last 10 years.

### Disclosure 1 of 1

<b>Reporting Source:</b>	Broker
<b>Action Type:</b>	Bankruptcy
<b>Bankruptcy:</b>	Chapter 7
<b>Action Date:</b>	12/29/2017
<b>Organization Investment-Related?</b>	
<b>Type of Court:</b>	Federal Court
<b>Name of Court:</b>	US Bankruptcy Court
<b>Location of Court:</b>	Eastern District of New York
<b>Docket/Case #:</b>	1-17-46932
<b>Action Pending?</b>	Yes



## Judgment / Lien

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

### Disclosure 1 of 1

<b>Reporting Source:</b>	Broker
<b>Judgment/Lien Holder:</b>	Internal Revenue Service
<b>Judgment/Lien Amount:</b>	\$575,101.40
<b>Judgment/Lien Type:</b>	Tax
<b>Date Filed with Court:</b>	11/08/2011
<b>Date Individual Learned:</b>	05/15/2015
<b>Type of Court:</b>	Federal Court
<b>Name of Court:</b>	Supreme Court of Richmond County
<b>Location of Court:</b>	18 Richmond Ter, Staten Island, New York, 10301
<b>Docket/Case #:</b>	36743401
<b>Judgment/Lien Outstanding?</b>	Yes
<b>Broker Statement</b>	My accountant is in the final stages of reaching a compromise with the IRS which would resolve this debt.

## End of Report



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