

BrokerCheck Report

JAMES WILLIAM FLOWER

CRD# 2817701

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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.

Thank you for using FINRA BrokerCheck.



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

brokercheck.finra.org



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)

JAMES W. FLOWER

CRD# 2817701

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 SPARTAN CAPITAL SECURITIES, LLC**
CRD# 146251
GARDEN CITY, NY
06/2019 - 06/2021
- B SW FINANCIAL**
CRD# 145012
Melville, NY
12/2015 - 06/2019
- B LAIDLAW & COMPANY (UK) LTD.**
CRD# 119037
MELVILLE, NY
05/2014 - 12/2015

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	2
Customer Dispute	4
Financial	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 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	10/01/2018
B General Securities Representative Examination	Series 7	09/05/1997

State Securities Law Exams

Exam	Category	Date
B Uniform Securities Agent State Law Examination	Series 63	12/20/1996

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 06/2019 - 06/2021	SPARTAN CAPITAL SECURITIES, LLC	146251	GARDEN CITY, NY
B 12/2015 - 06/2019	SW FINANCIAL	145012	Melville, NY
B 05/2014 - 12/2015	LAIDLAW & COMPANY (UK) LTD.	119037	MELVILLE, NY
B 11/2010 - 05/2014	GLOBAL ARENA CAPITAL CORP	16871	MELVILLE, NY
B 10/2009 - 11/2010	PRESTIGE FINANCIAL CENTER, INC.	30407	MELVILLE, NY
B 08/2009 - 11/2009	BROOKSTONE SECURITIES, INC.	13366	GARDEN CITY, NY
B 04/2008 - 09/2009	PRESTIGE FINANCIAL CENTER, INC.	30407	GARDEN CITY, NY
B 04/2008 - 05/2008	OBSIDIAN FINANCIAL GROUP, LLC	104255	WOODBURY, NY
B 04/2006 - 04/2008	WESTROCK ADVISORS, INC.	114338	WOODBURY, NY
B 08/2004 - 05/2006	J.P. TURNER & COMPANY, L.L.C.	43177	GARDEN CITY, NY
B 08/2004 - 08/2004	WESTROCK ADVISORS, INC.	114338	NEW YORK, NY
B 01/2004 - 07/2004	GRANITE ASSOCIATES, INC	46682	DELRAY BEACH, FL
B 04/2003 - 01/2004	CONTINENTAL BROKER-DEALER CORP.	14048	CARLE PLACE, NY
B 01/2001 - 05/2003	HARRISON SECURITIES, INC.	14103	PORT WASHINGTON, NY
B 09/1998 - 12/2000	WHITEHALL WELLINGTON INVESTMENTS, INC.	38022	PORT WASHINGTON, NY
B 01/1998 - 09/1998	TASIN & COMPANY, INC.	30709	HAUPPAUGE, NY
B 12/1997 - 01/1998	DUKE & CO., INC.	8035	NEW YORK, NY
B 09/1997 - 11/1997	GAINES, BERLAND INC.	14623	BETHPAGE, NY

Employment History



Registration and Employment History

Employment History, continued

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
06/2019 - Present	Spartan Capital Securities, LLC	Registered Representative	Y	Garden City, NY, United States
11/2015 - 06/2019	Salomon Whitney Financial	Registered Representative	Y	Farmingdale, NY, United States
10/2017 - 03/2019	Elite Coin and Bullion	Rare Coin Sales	N	Melville, NY, United States
05/2014 - 11/2015	LIDLAW AND COMPANY (UK) LTD	REGISTERED REPRESENTATIVE	Y	NEW YORK, NY, United States
11/2010 - 05/2014	GLOBAL ARENA CAPITAL	RR	Y	NEW YORK, 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.

JAMES FLOWER INC.; OWNER; 2 RAWLINGS DRIVE, MELLVILLE, NY 11747; NON INVESTMENT RELATED; used for tax purposes; STARTED 01-19-2012; 2 HOURS PER MONTH 0 DURING BUSINESS HOURS



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	2	0
Customer Dispute	0	4	N/A
Financial	0	1	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 2

Reporting Source: Regulator

Regulatory Action Initiated By: FINRA

Sanction(s) Sought: Other: N/A

Date Initiated: 04/10/2020

Docket/Case Number: [2017052701101](#)

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

Product Type: Other: Unspecified Securities

Allegations: Flower was named a respondent in a FINRA complaint alleging that he willfully violated Section 10(b) of the Securities Exchange Act of 1934 (Exchange Act) and Rule 10b-5 thereunder, and violated FINRA Rule 2020 by churning and excessively trading in customers' accounts. The complaint alleges that Flower controlled the trading in the customers' accounts, decided what securities to buy and sell, the quantity of each transaction, and the timing of each transaction. Flower also made unauthorized trades in a customer's account. Flower's trading in the accounts was grossly excessive and quantitatively unsuitable for the customers, as evidenced by the extremely high annualized turnover and cost-to-equity ratios, the frequency of the transactions, and the transaction costs incurred. Flower's trading in the customers' accounts resulted in realized losses totaling over



\$220,000 while generating more than \$210,000 in commissions and fees. Flower's churning and excessive trading made it virtually impossible for any of the customers to make a profit. The complaint also alleges that Flower executed trades in the non-discretionary account of a customer without first obtaining the customer's required authorization or consent. The complaint further alleges that Flower caused inaccuracies in his member firm's books and records by mismarking solicited sales transactions in those accounts as unsolicited.

Current Status:	Final
Resolution:	Decision
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	Yes
Resolution Date:	07/14/2021
Sanctions Ordered:	Bar (Permanent) Monetary Penalty other than Fines Restitution
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?	Yes



(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?

Yes

(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

No



(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?

No

Sanction 1 of 1

Sanction Type: Bar (Permanent)

Capacities Affected: All capacities

Duration: Indefinite

Start Date: 07/14/2021

End Date:

Monetary Sanction 1 of 2

Monetary Related Sanction: Restitution

Total Amount: \$242,014.46

Portion Levied against individual: \$242,014.46

Payment Plan: plus prejudgment interest

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Monetary Sanction 2 of 2



Monetary Related Sanction:	Monetary Penalty other than Fines
Total Amount:	\$10,655.45
Portion Levied against individual:	\$10,655.45
Payment Plan:	Costs
Is Payment Plan Current:	
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	
Regulator Statement	<p>Extended Hearing Panel decision rendered May 27, 2021. The sanctions were based on findings that Flower churned the accounts of customers in willful violation of Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder, and in violation of FINRA Rule 2020. The findings stated that Flower excessively traded the customer accounts in violation of FINRA rules regarding quantitative unsuitability. There were multiple signs of excessive trading and Flower's misconduct rose to the level of churning because he traded for his own benefit, in reckless disregard of his customers' interests, while exercising de facto control of the accounts. Flower repeatedly turned over or replaced all the securities in the accounts with new securities. The resulting annualized cost-to-equity ratios were also high meaning that the customers would have to make back a large amount of money, sometimes more than the cash value in the account, to cover their expenses and break even. The customers could make no profit until the expenses were covered. The high cost-to-equity ratios made it virtually impossible that the accounts could be profitable. Flower also engaged in what is known as in-and-out trading in the accounts, buying and then selling the same stock in a matter of a few days. In addition, the customers were unsophisticated investors. None of the customers had actively traded securities before, none of them tracked what was happening in their accounts in any meaningful way, and none of them had much of an understanding about the way securities brokers are paid or, in particular, how Flower was paid. In fact, Flower discouraged the customers from trying to understand what was going on in their accounts. The customers together suffered realized losses totaling roughly \$223,000 and Flower charged commissions on the trading of nearly \$185,000, of which he received 70 percent. The findings also stated that Flower effected unauthorized trades in a customer's account. Flower engaged in all but one of the unauthorized trades while the customer was experiencing serious medical issues that interfered with his daily living. The trading resulted in more than \$30,000 in market losses. The findings also included that Flower caused his member firm's books and records to be false and inaccurate by mismarking transactions in accounts as unsolicited, when they</p>



were in fact solicited. Most of the purported unsolicited trades were sales at a loss and the mismarking of the sales as unsolicited made it seem that the customers had chosen to take the losses and helped obscure Flower's excessive trading and churning.

The decision became final July 14, 2021.

Reporting Source:	Firm
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	Other: N/A
Date Initiated:	04/10/2020
Docket/Case Number:	2017052701101
Employing firm when activity occurred which led to the regulatory action:	SW Financial
Product Type:	Other: Unspecified Securities
Allegations:	Flower was named a respondent in a FINRA complaint alleging that he willfully violated Section 10(b) of the Securities Exchange Act of 1934 (Exchange Act) and Rule 10b-5 thereunder, and violated FINRA Rule 2020 by churning and excessively trading in customers' accounts. The complaint alleges that Flower controlled the trading in the customers' accounts, decided what securities to buy and sell, the quantity of each transaction, and the timing of each transaction. Flower also made unauthorized trades in a customer's account. Flower's trading in the accounts was grossly excessive and quantitatively unsuitable for the customers, as evidenced by the extremely high annualized turnover and cost-to-equity ratios, the frequency of the transactions, and the transaction costs incurred. Flower's trading in the customers' accounts resulted in realized losses totaling over \$220,000 while generating more than \$210,000 in commissions and fees. Flower's churning and excessive trading made it virtually impossible for any of the customers to make a profit. The complaint also alleges that Flower executed trades in the non-discretionary account of a customer without first obtaining the customer's required authorization or consent. The complaint further alleges that Flower caused inaccuracies in his member firm's books and records by mismarking solicited sales transactions in those accounts as unsolicited.
Current Status:	Final
Resolution:	Decision
Resolution Date:	07/15/2021



Sanctions Ordered: Bar (Permanent)
Monetary Penalty other than Fines
Restitution

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? Yes

(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? Yes

(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 No



(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?

No

Sanction 1 of 1

Sanction Type: Bar (Permanent)

Capacities Affected: All capacities

Duration: Indefinite

Start Date: 07/15/2021

End Date:

Monetary Sanction 1 of 2

Monetary Related Sanction: Restitution

Total Amount: \$242,014.46

Portion Levied against individual: \$242,014.46

Payment Plan: plus prejudgment interest

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Monetary Sanction 2 of 2



Monetary Related Sanction: Monetary Penalty other than Fines

Total Amount: \$10,655.45

Portion Levied against individual: \$10,655.45

Payment Plan: Costs

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: Other: N/A

Date Initiated: 04/10/2020

Docket/Case Number: [2017052701101](#)

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

Product Type: Other: Unspecified Securities

Allegations: Flower was named a respondent in a FINRA complaint alleging that he willfully violated Section 10(b) of the Securities Exchange Act of 1934 (Exchange Act) and Rule 10b-5 thereunder, and violated FINRA Rule 2020 by churning and excessively trading in customers' accounts. The complaint alleges that Flower controlled the trading in the customers' accounts, decided what securities to buy and sell, the quantity of each transaction, and the timing of each transaction. Flower also made unauthorized trades in a customer's account. Flower's trading in the accounts was grossly excessive and quantitatively unsuitable for the customers, as evidenced by the extremely high annualized turnover and cost-to-equity ratios, the frequency of the transactions, and the transaction costs incurred. Flower's trading in the customers' accounts resulted in realized losses totaling over \$220,000 while generating more than \$210,000 in commissions and fees. Flower's churning and excessive trading made it virtually impossible for any of the



customers to make a profit. The complaint also alleges that Flower executed trades in the non-discretionary account of a customer without first obtaining the customer's required authorization or consent. The complaint further alleges that Flower caused inaccuracies in his member firm's books and records by mismarking solicited sales transactions in those accounts as unsolicited.

Current Status: Pending

Disclosure 2 of 2

Reporting Source: Regulator

Regulatory Action Initiated By: FINRA

Sanction(s) Sought:

Date Initiated: 06/12/2017

Docket/Case Number: [2014040644001](#)

Employing firm when activity occurred which led to the regulatory action: Global Arena Capital Corp.

Product Type: Other: exchange-traded note

Allegations: Without admitting or denying the findings, Flower consented to the sanctions and to the entry of findings that he recommended that 13 of his customers invest in a highly volatile exchange-traded note without having a reasonable basis for recommending the transactions. The findings stated that at the time Flower was recommending the exchange-traded note, Flower incorrectly believed that it traded inverse to the S&P 500 index. This erroneous perception led him to recommend that customers purchase and hold the exchange-traded note as a hedge to an anticipated overall market decline. Based on Flower's recommendations, 13 customers suffered losses in excess of \$249,000 after holding their shares for periods ranging from two weeks to over one year. Flower lacked a sufficient understanding of the mechanics of the exchange-traded note to form a reasonable basis upon which to recommend the purchase of it to his customers.

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:

06/12/2017

Sanctions Ordered:

Suspension

Undertaking

Other: Within 60 days of the date of the Notice of Acceptance of the AWC, Flower will undertake to attend and satisfactorily complete 10 hours of continuing education concerning complex products, which includes exchange-traded notes, by a provider not unacceptable to FINRA. Within 30 days of following completion of such training, Flower will submit written proof that the continuing education program has been satisfactorily completed. In light of Flower's financial status, no monetary sanction is being assessed.

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:	All Capacities
Duration:	Three months
Start Date:	07/03/2017
End Date:	10/02/2017



Reporting Source:	Broker
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	Suspension
Date Initiated:	06/12/2017
Docket/Case Number:	2014040644001
Employing firm when activity occurred which led to the regulatory action:	Global Arena Capital Corp.
Product Type:	Other: Exchange traded note
Allegations:	Without admitting or denying the findings, Flower consented to the sanctions and to the entry of findings that he recommended that 13 of his customers invest in a highly volatile exchange-traded note without having a reasonable basis for recommending the transactions. The findings stated that at the time Flower was recommending the exchange-traded note, Flower incorrectly believed that it traded inverse to the S&P 500 index. This erroneous perception led him to recommend that customers purchase and hold the exchange-traded note as a hedge to an anticipated overall market decline. Based on Flower's recommendations, 13 customers suffered losses in excess of \$249,000 after holding their shares for periods ranging from two weeks to over one year. Flower lacked a sufficient understanding of the mechanics of the exchange-traded note to form a reasonable basis upon which to recommend the purchase of it to his customers.
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:	06/16/2017
Sanctions Ordered:	Suspension Other: Within 60 days of the date of the Notice of Acceptance of the AWC, Flower will undertake to attend and satisfactorily complete 10 hours of continuing education concerning complex products, which includes exchange-traded notes,



by a provider not unacceptable to FINRA. Within 30 days of following completion of such training, Flower will submit written proof that the continuing education program has been satisfactorily completed. In light of Flower's financial status, no monetary sanction is being assessed.

Sanction 1 of 1

Sanction Type:

Suspension

Capacities Affected:

All capacities

Duration:

Three (3) Months

Start Date:

07/03/2017

End Date:

10/02/2017



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 2

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	Laidlaw and Company (UK) Ltd.
Allegations:	The Client alleges churning and unsuitability from May 2014 to July 2015
Product Type:	Equity-OTC Equity Listed (Common & Preferred Stock)
Alleged Damages:	\$90,000.00
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:	09/22/2015
Complaint Pending?	No
Status:	Settled
Status Date:	11/12/2015
Settlement Amount:	\$45,000.00
Individual Contribution Amount:	\$0.00
Broker Statement	The claim will be defended vigorously.

Disclosure 2 of 2

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	PRESTIGE FINANCIAL CENTER, INC
Allegations:	MISREPRESENTED THE CHARACTERISICS AND RISKS ASSOCITED WITH



MULTIPLE PURCHASES OF A ETF, FAILED TO EXECUTE A STOP LOSS ORDER AND MISREPRESENTATION OF THE UTILIZATION OF MARGIN.

Product Type: Other: ETF

Alleged Damages: \$100,000.00

Alleged Damages Amount Explanation (if amount not exact): MISREPRESENTED THE CHARACTERISICS AND RISKS ASSOCIATED WITH MULTIPLE PURCHASES OF AN ETF, FAILED TO EXECUTE A STOP LOSS ORDER AND MISREPRESENTATION OF THE UTILIZATION OF MARGIN.

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: 04/15/2010

Complaint Pending? No

Status: Evolved into Arbitration/CFTC reparation (the individual is a named party)

Status Date: 12/27/2010

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

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

Docket/Case #: [10-05029](#)

Date Notice/Process Served: 12/27/2010

Arbitration Pending? No

Disposition: Settled

Disposition Date: 06/17/2011

Monetary Compensation Amount: \$67,500.00



Individual Contribution Amount:

\$67,500.00

Broker Statement

COMPLAINT SETTLED-- WITHOUT ADMITTING OR DENYING ANY WRONG DOING. I CONTRIBUTED WHAT WAS ADVISED, AFTER DOING AN ECONOMIC ANALYSIS OF THE COST FOR AN ARBITRATION HEARING



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:	Broker
Employing firm when activities occurred which led to the complaint:	Global Arena Capital Corp., and Laidlaw and Company(UK) Ltd.
Allegations:	Client alleges over-concentration, unsuitability, excessive use of margin and churning from November 2014 to March 2015
Product Type:	Equity-OTC Equity Listed (Common & Preferred Stock)
Alleged Damages:	\$250,000.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	15-02278
Date Notice/Process Served:	09/18/2015
Arbitration Pending?	No
Disposition:	Other: Stayed due to bankruptcy
Disposition Date:	08/01/2016
Broker Statement	The claim will be defended vigorously.

Disclosure 2 of 2

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	J.P. TURNER & COMPANY L.L.C.
Allegations:	CLIENT ALLEGES BROKER FAILED TO PLACE STOP LOSS AS INSTRUCTED.
Product Type:	Equity - OTC



Alleged Damages: \$21,000.00

Customer Complaint Information

Date Complaint Received: 04/27/2006

Complaint Pending? No

Status: Withdrawn

Status Date: 05/02/2006

Settlement Amount:

Individual Contribution Amount:

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: JP TURNER & COMPANY LLC

Allegations: CLIENT ALLEGES BROKER FAILED TO PLACE STOP LOSS AS INSTRUCTED

Product Type: Equity - OTC

Alleged Damages: \$21,000.00

Customer Complaint Information

Date Complaint Received: 04/27/2006

Complaint Pending? No

Status: Withdrawn

Status Date: 05/02/2006

Settlement Amount:

Individual Contribution Amount:



Financial - Final

This type of disclosure event involves a 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

Reporting Source:	Regulator
Action Type:	Bankruptcy
Bankruptcy:	Chapter 7
Action Date:	01/14/2016
Organization Investment-Related?	
Type of Court:	Federal Court
Name of Court:	UNITED STATES BANKRUPTCY COURT
Location of Court:	NEW YORK EASTERN - CENTRALISLIP
Docket/Case #:	16-70155
Action Pending?	No
Disposition:	Discharged
Disposition Date:	04/13/2016
Regulator Statement	PROCEEDINGS IN FINRA ARBITRATION CASE # 15-02278 AGAINST FLOWER, JAMES WILLIAM WERE STAYED BY BANKRUPTCY PROCEEDINGS IN THE U. S. BANKRUPTCY COURT, NEW YORK EASTERN - CENTRALISLIP, CASE # 16-70155.

Reporting Source:	Broker
Action Type:	Bankruptcy
Bankruptcy:	Chapter 7
Action Date:	01/14/2016
Organization Investment-Related?	
Type of Court:	Federal Court
Name of Court:	Bankruptcy court Eastern District of Long Island



Location of Court:	Central Islip , NY
Docket/Case #:	16-70155
Action Pending?	No
Disposition:	Discharged
Disposition Date:	02/10/2016

End of Report



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