

## BrokerCheck Report

**ROBERT JOSEPH KEYES JR**

CRD# 2894844

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

Please contact FINRA with any concerns.

## About BrokerCheck®



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

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

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.
- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

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

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

**ROBERT J. KEYES JR**

CRD# 2894844

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

**IA AMERIPRISE FINANCIAL SERVICES, LLC**  
 10845 Griffith Peak Dr Ste 690  
 Las Vegas, NV 89135  
 CRD# 6363  
 Registered with this firm since: 11/18/2015

**B AMERIPRISE FINANCIAL SERVICES, LLC**  
 10845 Griffith Peak Dr Ste 690  
 Las Vegas, NV 89135  
 CRD# 6363  
 Registered with this firm since: 11/18/2015

**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
- 32 U.S. states and territories

**This broker has passed:**

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

**Registration History**

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

- IA TRICOR ADVISORY SERVICES, LLC**  
 CRD# 141775  
 LAS VEGAS, NV  
 06/2009 - 11/2015
- B TRICOR FINANCIAL, LLC**  
 CRD# 142518  
 LAS VEGAS, NV  
 06/2009 - 11/2015
- IA ROYAL ALLIANCE ASSOCIATES, INC.**  
 CRD# 23131  
 SCOTTSDALE, AZ  
 05/2009 - 06/2009

**Disclosure Events**

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

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

**The following types of disclosures have been reported:**

| Type             | Count |
|------------------|-------|
| Customer Dispute | 7     |

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

### Employment 1 of 1

Firm Name: **AMERIPRISE FINANCIAL SERVICES, LLC**

Main Office Address: **9013RD AVENUE SOUTH  
MINNEAPOLIS, MN 55402**

Firm CRD#: **6363**

|   | SRO   | Category                          | Status   | Date       |
|---|-------|-----------------------------------|----------|------------|
| B | FINRA | General Securities Principal      | Approved | 11/18/2015 |
| B | FINRA | General Securities Representative | Approved | 11/18/2015 |
| B | FINRA | Invest. Co and Variable Contracts | Approved | 11/18/2015 |

|    | U.S. State/ Territory | Category                          | Status   | Date       |
|----|-----------------------|-----------------------------------|----------|------------|
| B  | Alaska                | Agent                             | Approved | 10/27/2025 |
| IA | Alaska                | Investment Adviser Representative | Approved | 10/27/2025 |
| B  | Arizona               | Agent                             | Approved | 01/12/2016 |
| B  | Arkansas              | Agent                             | Approved | 07/29/2020 |
| B  | California            | Agent                             | Approved | 11/18/2015 |
| IA | California            | Investment Adviser Representative | Approved | 11/18/2015 |
| B  | Colorado              | Agent                             | Approved | 01/21/2016 |
| B  | Florida               | Agent                             | Approved | 11/18/2015 |
| B  | Georgia               | Agent                             | Approved | 01/12/2016 |
| B  | Idaho                 | Agent                             | Approved | 07/29/2024 |

## Broker Qualifications



### Employment 1 of 1, continued

|    | U.S. State/ Territory | Category                          | Status   | Date       |
|----|-----------------------|-----------------------------------|----------|------------|
| B  | Illinois              | Agent                             | Approved | 02/17/2016 |
| IA | Illinois              | Investment Adviser Representative | Approved | 10/22/2025 |
| B  | Indiana               | Agent                             | Approved | 10/05/2018 |
| B  | Kansas                | Agent                             | Approved | 10/21/2025 |
| IA | Kansas                | Investment Adviser Representative | Approved | 10/21/2025 |
| B  | Kentucky              | Agent                             | Approved | 03/26/2020 |
| B  | Michigan              | Agent                             | Approved | 11/18/2015 |
| IA | Michigan              | Investment Adviser Representative | Approved | 10/23/2025 |
| B  | Minnesota             | Agent                             | Approved | 11/18/2015 |
| B  | Missouri              | Agent                             | Approved | 10/18/2024 |
| B  | Montana               | Agent                             | Approved | 05/20/2020 |
| B  | Nevada                | Agent                             | Approved | 01/08/2016 |
| IA | Nevada                | Investment Adviser Representative | Approved | 01/08/2016 |
| B  | New Mexico            | Agent                             | Approved | 11/18/2015 |
| B  | New York              | Agent                             | Approved | 09/10/2018 |
| B  | North Carolina        | Agent                             | Approved | 11/19/2015 |
| B  | Ohio                  | Agent                             | Approved | 06/17/2025 |
| B  | Oklahoma              | Agent                             | Approved | 01/12/2016 |
| B  | Oregon                | Agent                             | Approved | 12/17/2015 |
| B  | Pennsylvania          | Agent                             | Approved | 12/28/2015 |
| B  | South Carolina        | Agent                             | Approved | 10/28/2025 |

## Broker Qualifications



### Employment 1 of 1, continued

|    | U.S. State/ Territory | Category                          | Status              | Date       |
|----|-----------------------|-----------------------------------|---------------------|------------|
| IA | South Carolina        | Investment Adviser Representative | Approved            | 10/28/2025 |
| B  | Texas                 | Agent                             | Approved            | 11/18/2015 |
| IA | Texas                 | Investment Adviser Representative | Restricted Approval | 11/18/2015 |
| B  | Utah                  | Agent                             | Approved            | 01/11/2016 |
| IA | Utah                  | Investment Adviser Representative | Approved            | 01/14/2016 |
| B  | Virginia              | Agent                             | Approved            | 11/18/2015 |
| B  | Washington            | Agent                             | Approved            | 01/13/2016 |
| B  | West Virginia         | Agent                             | Approved            | 04/13/2023 |
| B  | Wisconsin             | Agent                             | Approved            | 01/11/2016 |
| B  | Wyoming               | Agent                             | Approved            | 10/24/2025 |
| IA | Wyoming               | Investment Adviser Representative | Approved            | 10/24/2025 |

### Branch Office Locations

#### AMERIPRISE FINANCIAL SERVICES, LLC

10845 Griffith Peak Dr Ste 690  
Las Vegas, NV 89135

#### AMERIPRISE FINANCIAL SERVICES, LLC

Las Vegas, NV



## Broker Qualifications

### Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below. A passed exam or exam waiver does not permit a broker to do business without an active SRO or state registration.

**This individual has passed 1 principal/supervisory exam, 3 general industry/product exams, and 2 state securities law exams.**

### Principal/Supervisory Exams

| Exam                                              | Category  | Date       |
|---------------------------------------------------|-----------|------------|
| <b>B</b> General Securities Principal Examination | Series 24 | 03/28/2008 |

### General Industry/Product Exams

| Exam                                                                               | Category | Date       |
|------------------------------------------------------------------------------------|----------|------------|
| <b>B</b> Securities Industry Essentials Examination                                | SIE      | 10/01/2018 |
| <b>B</b> General Securities Representative Examination                             | Series 7 | 01/03/2003 |
| <b>B</b> Investment Company Products/Variable Contracts Representative Examination | Series 6 | 10/07/1997 |

### State Securities Law Exams

| Exam                                                      | Category  | Date       |
|-----------------------------------------------------------|-----------|------------|
| <b>B</b> <b>IA</b> Uniform Combined State Law Examination | Series 66 | 05/08/2007 |
| <b>B</b> Uniform Securities Agent State Law Examination   | Series 63 | 06/11/1997 |

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at [www.finra.org/brokerqualifications/registeredrep/](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>IA</b> 06/2009 - 11/2015 | TRICOR ADVISORY SERVICES, LLC     | 141775 | LAS VEGAS, NV   |
| <b>B</b> 06/2009 - 11/2015  | TRICOR FINANCIAL, LLC             | 142518 | LAS VEGAS, NV   |
| <b>IA</b> 05/2009 - 06/2009 | ROYAL ALLIANCE ASSOCIATES, INC.   | 23131  | LAS VEGAS, NV   |
| <b>B</b> 01/2000 - 06/2009  | ROYAL ALLIANCE ASSOCIATES, INC.   | 23131  | LAS VEGAS, NV   |
| <b>B</b> 01/1999 - 01/2000  | SECURITIES AMERICA, INC.          | 10205  | LAVISTA, NE     |
| <b>B</b> 10/1997 - 01/1999  | DELTA EQUITY SERVICES CORPORATION | 15650  | BOLTON, MA      |

### 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            |
|-------------------|-------------------------------------|----------------|--------------------|------------------------------|
| 03/2020 - Present | Ameriprise Financial Services, LLC  | Registered Rep | Y                  | Las Vegas, NV, United States |
| 11/2015 - 03/2020 | Ameriprise Financial Services, Inc. | Registered Rep | Y                  | Henderson, NV, 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.

Independent Insurance Brokering; Penn Mutual; 12/30/2015; . Business Ownership; RJK Asset Management, Inc.; owner; entity established prior to Ameriprise Financial - not currently using this DBA but have kept active; 10501 W. Gowan #260 Las Vegas, NV 89129, .; Not Investment-Related; 10/10/1996; 1 to 9 hours per month; 1 to 9 during trading 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 |
|------------------|---------|-------|-----------|
| Customer Dispute | 0       | 7     | N/A       |



## Disclosure Event Details

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

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

### Customer Dispute - Settled

This type of disclosure event involves a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit containing allegations of sale practice violations against the broker that resulted in a monetary settlement to the customer.

#### Disclosure 1 of 3

|                                                                            |                                                                                                          |
|----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| <b>Reporting Source:</b>                                                   | Firm                                                                                                     |
| <b>Employing firm when activities occurred which led to the complaint:</b> | ROYAL ALLIANCE ASSOCIATES, INC.; TRICOR FINANCIAL, LLC                                                   |
| <b>Allegations:</b>                                                        | THE CUSTOMER ALLEGES THAT CERTAIN REIT RECOMMENDATIONS MADE IN 2005 AND 2006 WERE NOT SUITABLE FOR THEM. |
| <b>Product Type:</b>                                                       | Real Estate Security                                                                                     |
| <b>Alleged Damages:</b>                                                    | \$250,000.00                                                                                             |
| <b>Alleged Damages Amount Explanation (if amount not exact):</b>           | CLAIMANTS SEEK "LOST CAPITAL...IN EXCESS OF \$250,000.00"                                                |
| <b>Is this an oral complaint?</b>                                          | No                                                                                                       |
| <b>Is this a written complaint?</b>                                        | No                                                                                                       |
| <b>Is this an arbitration/CFTC reparation or civil litigation?</b>         | Yes                                                                                                      |
| <b>Arbitration/Reparation forum or court name and location:</b>            | FINRA, LAS VEGAS. NV                                                                                     |
| <b>Docket/Case #:</b>                                                      | 12-04212                                                                                                 |
| <b>Filing date of arbitration/CFTC reparation or civil litigation:</b>     | 12/11/2012                                                                                               |



## Customer Complaint Information

**Date Complaint Received:** 12/26/2012

**Complaint Pending?** No

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

**Status Date:** 12/26/2012

**Settlement Amount:**

**Individual Contribution Amount:**

## Arbitration Information

**Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):** FINRA, LAS VEGAS, NV

**Docket/Case #:** 12-04212

**Date Notice/Process Served:** 12/26/2012

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 12/19/2013

**Monetary Compensation Amount:** \$40,000.00

**Individual Contribution Amount:** \$5,000.00

**Firm Statement** THIS MATTER WAS SETTLED BY ROYAL ALLIANCE FOR A FRACTION OF THE AMOUNT CLAIMED SOLELY TO AVOID THE COST AND UNCERTAINTY OF ARBITRATION.

**Reporting Source:** Broker

**Employing firm when activities occurred which led to the complaint:** ROYAL ALLIANCE ASSOCIATES

**Allegations:** CLAIMANTS ALLEGE THAT CERTAIN REIT RECOMMENDATIONS MADE IN 2005 AND 2006 WERE NOT SUITABLE FOR THEM.

**Product Type:** Annuity-Variable



Real Estate Security

**Alleged Damages:**

\$250,000.00

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

CLAIMANTS SEEK "LOST CAPITAL...IN EXCESS OF \$250,000.00"

**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:**

LAS VEGAS, NV

**Docket/Case #:**

12-04212

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

12/11/2012

**Customer Complaint Information****Date Complaint Received:**

12/20/2012

**Complaint Pending?**

No

**Status:**

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

**Status Date:**

12/26/2012

**Settlement Amount:****Individual Contribution  
Amount:****Arbitration Information****Arbitration/CFTC reparation  
claim filed with (FINRA, AAA,  
CFTC, etc.):**

FINRA

**Docket/Case #:**

12-04212

**Date Notice/Process Served:**

12/26/2012

**Arbitration Pending?**

No

**Disposition:**

Settled



**Disposition Date:** 12/19/2013

**Monetary Compensation Amount:** \$40,000.00

**Individual Contribution Amount:** \$5,000.00

**Broker Statement**

CLAIMANT INITIATED A CLAIM AGAINST ME ASSERTING THAT THEY EXPERIENCED DAMAGES IN EXCESS OF \$250,000. THEY SPOKE OF UNSUITABLE RECOMMENDATIONS AND THEY REFERENCED THEIR AGE AS RETIREES TO SEEMINGLY INFER THAT THEY WERE BEING TAKEN ADVANTAGE OF-AGAIN ALL OF THIS WAS LAID OUT IN THE COMPLAINT THAT THEY ATTESTED TO. CERTAIN ELEMENTS OF THIS CASE MUST BE POINTED OUT. ROYAL ALLIANCE, ALSO NAMED IN THIS CLAIM, INITIATED A 3RD PARTY PORTFOLIO REVIEW AND DISCOVERED AS I STATED THAT THESE CLIENTS EXPERIENCED A POSITIVE TOTAL RETURN-CONTRARY TO THE CLAIM. AT THIS POINT IN TIME CLAIMANT THEN INSISTED ON REMOVING THOSE HOLDINGS THAT PERFORMED TO THE POSITIVE AND ONLY FOCUS ON THE HOLDINGS THAT WERE NOT POSITIVE-A THEORY THAT WOULD GUARANTEE PERFORMANCE AND ACCORDINGLY TO PRIOR CASE STUDY-UNACCEPTABLE. OTHER ELEMENTS THAT ARE IMPORTANT IS THAT FACT THAT THIS CLAIM HAD EXCEEDED THE 6 YEAR ELIGIBILITY RULE SET FORTH BY FINRA-THIS ELEMENT CLAIMANTS OWN COUNSEL POINTS OUT ON HIS WEBSITE AS A QUALIFYING ISSUE. MOST IMPORTANTLY, IT MUST BE SAID THAT I WAS ABLE TO SETTLE THIS ISSUE IN WHOLE BY PROVIDING A \$5,000 PAYMENT TO AVOID AN ARBITRATION COSTS THAT CERTAINLY WOULD HAVE EXCEEDED \$50,000 ACCORDING TO MY COUNSEL. THIS \$5,000 PAYMENT REPRESENTED A VALUE FAR LESS THAN THE \$250,000 CLAIM AT INCEPTION.

**Disclosure 2 of 3**

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** ROYAL ALLIANCE

**Allegations:** CLAIMANTS ALLEGE UNSUITABLE RECOMMENDATION TO PURCHASE REITS.

**Product Type:** Real Estate Security

**Alleged Damages:** \$170,000.00

**Is this an oral complaint?** No

**Is this a written complaint?** No



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

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

**Docket/Case #:** 12-02998

**Filing date of arbitration/CFTC reparation or civil litigation:** 08/13/2012

### Customer Complaint Information

**Date Complaint Received:** 08/31/2012

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 07/09/2013

**Settlement Amount:** \$25,000.00

**Individual Contribution Amount:** \$0.00

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**Reporting Source:** Broker

**Employing firm when activities occurred which led to the complaint:** ROYAL ALLIANCE

**Allegations:** CLAIMANTS ALLEGE UNSUITABLE RECOMMENDATION TO PURCHASE REITS.

**Product Type:** Real Estate Security

**Alleged Damages:** \$170,000.00

**Is this an oral complaint?** No

**Is this a written complaint?** No

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

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



**Docket/Case #:** 12-02998  
**Filing date of arbitration/CFTC reparation or civil litigation:** 08/13/2012

### Customer Complaint Information

**Date Complaint Received:** 08/31/2012  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:** 07/09/2013  
**Settlement Amount:** \$25,000.00  
**Individual Contribution Amount:** \$0.00

### Broker Statement

I WAS NEVER NOTIFIED BY FINRA OR MY FORMER BROKER/DEALER ROYAL ALLIANCE THAT ANY COMPLAINT IN ANY FORMAT EXISTED REGARDING [CUSTOMERS]. I WAS NEVER AFFORDED THAT ABILITY TO DOCUMENT FACTS RELATING TO THIS CLIENT IN A MANNER THAT WOULD HAVE BROUGHT APPROPRIATE PERSPECTIVE TO THIS ISSUE. SEVERAL THOUGHTS MUST BE NOTED: CLIENTS HOLDINGS WERE WITHIN REASONABLE STANDARDS RELATING TO RISK TOLERANCE, NET WORTH, TIME HORIZON AND PRODUCT ALLOCATION. I HAVE CLIENT SIGNED DOCUMENTATION TO FULLY SUPPORT THIS ALONG WITH SIGNED DOCUMENTATION ATTESTING TO THE FACT THAT THE CLIENT UNDERSTOOD ALL LIQUIDITY AND MARKET RISKS THAT WAS ASSOCIATED. THE CLIENTS "ALLEGED DAMAGE CLAIM" EXCEEDS THE TOTAL INVESTED INTO SAID PRODUCTS THUS THEY WOULD HAVE NEEDED TO EXPERIENCE MORE THAN TOTAL MARKET LOSS TO MEET THOSE FIGURES-WHICH CLEARLY IS NOT THE CASE. IN ADDITION, THIS CLAIM DOES NOT INCLUDE THE REST OF THE CLIENT'S PORTFOLIO. LAST, I WAS NOT THE SOLICITING REPRESENTATIVE ON THE PRODUCTS ISOLATED IN THIS CLAIM AND IT MUST BE POINTED OUT THAT THE SOLICITATION OF THE TWO PROGRAMS OCCURRED IN 2004 WHICH PLACES THIS CLAIM BEYOND FINRA'S 6 YEAR LIMITATION RULE. I INTEND TO PURSUE ANY/ALL ACTIONS AVAILABLE TO ME AGAINST THIS CLIENT AND I COMPLETELY DISAGREE WITH ANY SETTLEMENT THAT ROYAL ALLIANCE HAS SAW FIT TO ENTER INTO.

### Disclosure 3 of 3

**Reporting Source:** Broker



**Employing firm when activities occurred which led to the complaint:** ROYAL ALLIANCE ASSOCIATES, INC.

**Allegations:** UNSUITABLE VARIABLE ANNUITIES FROM 2000.

**Product Type:** Annuity(ies) - Variable

**Alleged Damages:** \$90,000.00

### Customer Complaint Information

**Date Complaint Received:** 09/29/2003

**Complaint Pending?** No

**Status:** Arbitration/Reparation

**Status Date:** 01/04/2005

**Settlement Amount:**

**Individual Contribution Amount:**

### Arbitration Information

**Arbitration/Reparation Claim filed with and Docket/Case No.:** NASD 03-06481

**Date Notice/Process Served:** 09/29/2003

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 01/03/2005

**Monetary Compensation Amount:** \$26,500.00

**Individual Contribution Amount:** \$0.00



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

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

### Disclosure 1 of 4

|                                                                            |                                                                                                               |
|----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| <b>Reporting Source:</b>                                                   | Firm                                                                                                          |
| <b>Employing firm when activities occurred which led to the complaint:</b> | ROYAL ALLIANCE ASSOCIATES, INC.                                                                               |
| <b>Allegations:</b>                                                        | CUSTOMER COMPLAINED THAT HER INVESTMENT WAS UNSUITABLE BASED ON HER INVESTMENT OBJECTIVES AND SOPHISTICATION. |
| <b>Product Type:</b>                                                       | Real Estate Security                                                                                          |
| <b>Alleged Damages:</b>                                                    | \$0.00                                                                                                        |
| <b>Alleged Damages Amount Explanation (if amount not exact):</b>           | CUSTOMER DID NOT ALLEGE A SPECIFIC DAMAGE AMOUNT. THE TOTAL INVESTMENT WAS \$72,000.                          |
| <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>        | 03/23/2011 |
| <b>Complaint Pending?</b>              | No         |
| <b>Status:</b>                         | Denied     |
| <b>Status Date:</b>                    | 03/29/2011 |
| <b>Settlement Amount:</b>              |            |
| <b>Individual Contribution Amount:</b> |            |

|                          |        |
|--------------------------|--------|
| <b>Reporting Source:</b> | Broker |
|--------------------------|--------|



|                                                                            |                                                                                                               |
|----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| <b>Employing firm when activities occurred which led to the complaint:</b> | ROYAL ALLIANCE ASSOCIATES, INC.                                                                               |
| <b>Allegations:</b>                                                        | CUSTOMER COMPLAINED THAT HER INVESTMENT WAS UNSUITABLE BASED ON HER INVESTMENT OBJECTIVES AND SOPHISTICATION. |
| <b>Product Type:</b>                                                       | Real Estate Security                                                                                          |
| <b>Alleged Damages:</b>                                                    | \$0.00                                                                                                        |
| <b>Alleged Damages Amount Explanation (if amount not exact):</b>           | CUSTOMER DID NOT ALLEGE A SPECIFIC DAMAGE AMOUNT. THE TOTAL INVESTMENT WAS \$72,000.                          |
| <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>        | 03/23/2011                                                                                                                                                                                                                                                                                                                                                               |
| <b>Complaint Pending?</b>              | No                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Status:</b>                         | Denied                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Status Date:</b>                    | 03/29/2011                                                                                                                                                                                                                                                                                                                                                               |
| <b>Settlement Amount:</b>              |                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Individual Contribution Amount:</b> |                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Broker Statement</b>                | [CUSTOMER], IN HER LETTER, IMPLIED THAT HER INVESTMENT WAS UNSUITABLE EFFECTIVELY DUE TO ILLIQUIDITY. SHE FAILED TO MENTION THAT THIS HOLDING EQUALS LESS THAN 2% OF HER LIQUID ESTATE AND THE FACT THAT 98% WAS READILY AVAILABLE. FURTHER, SHE SIGNED MULTIPLE DOCUMENTS AFFIRMING THAT LIQUIDITY MIGHT NOT BE AVAILABLE. ROYAL ALLIANCE ASSOCIATES, INC DENIED CLAIM. |

### Disclosure 2 of 4

**Reporting Source:** Broker



**Employing firm when activities occurred which led to the complaint:** ROYAL ALLIANCE ASSOCIATES, INC.

**Allegations:** CUSTOMER ALLEGES IT WAS UNSUITABLE FOR MR. KEYES TO RECOMMEND HE INVEST IN A VARIABLE ANNUITY.

**Product Type:** Annuity(ies) - Variable

**Alleged Damages:** \$19,023.94

### Customer Complaint Information

**Date Complaint Received:** 07/16/2008

**Complaint Pending?** No

**Status:** Denied

**Status Date:** 12/11/2008

**Settlement Amount:**

**Individual Contribution Amount:**

**Broker Statement** THE STATE OF NEVADA DEPARTMENT OF BUSINESS AND INDUSTRY REVIEWED THE COMPLAINT AND COULD "FIND NO REASON WHY MR. KEYES SHOULD BE HELD ACCOUNTABLE FOR DECISIONS" THE CLIENT MADE. THE STATE ALSO NOTIFIED THE CUSTOMER THAT MR. KEYES HAD NOT "VIOLATED ANY INSURANCE LAWS OR REGULATIONS WITH THIS TRANSACTION."

### Disclosure 3 of 4

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** SECURITIES AMERICA

**Allegations:** MR. RUDE ALLEGES THE VARIABLE ANNUITY HE PURCHASED WAS MISREPRESENTED TO HIM AND WAS NOT CONSISTENT WITH HIS INVESTMENT RISK. CLIENT CLAIMS HE WAS INFORMED THE NEVADA LIFE AND HEALTH INS. GUARANTY ASSOCIATION ACT WOULD PROTECT HIS PRINCIPAL INVESTMENT.

**Product Type:** Annuity(ies) - Variable

**Alleged Damages:** \$47,000.00



## Customer Complaint Information

**Date Complaint Received:** 08/06/2003

**Complaint Pending?** No

**Status:** Denied

**Status Date:** 06/16/2004

**Settlement Amount:**

**Individual Contribution Amount:**

**Reporting Source:** Broker

**Employing firm when activities occurred which led to the complaint:** SECURITIES AMERICA

**Allegations:** MR. RUDE, ACCORDING TO A LETTER DRATED ON 8/6/2003, ALLEGES THAT A VARIABLE ANNUITY HE PURCHASED WAS MISREPRESENTED TO HIM AND THAT THE INVESTMENT WAS NOT CONSISTANT WITH HIS INVESTMENT RISK. CLIENT ALSO CLAIMS THAT HE WAS INFORMED THE NEVADA LIFE AND HEALTH INS. GUARANTY ASSN. WOULD PROTECT HIS PRINCIPAL INVESTMENT.

**Product Type:** Annuity(ies) - Variable

**Alleged Damages:** \$47,000.00

## Customer Complaint Information

**Date Complaint Received:** 08/06/2003

**Complaint Pending?** No

**Status:** Denied

**Status Date:** 06/16/2004

**Settlement Amount:**

**Individual Contribution Amount:**

**Broker Statement** MR RUDE WAS A CLIENT OF THE FIRM THAT I FORMERLY WORKED FOR. THE WRITING AGENT, PATRICK WILDE, WAS THE SERVICING AGENT. MY ROLE WAS THAT OF A TEAM, AND I SAT IN ON THE CALL WHEN THE PROGRAM WAS EXPLAINED TO MR. RUDE. THE PROGRAM THAT MR. RUDE



IS SPEAKING OF DOES FEATURE 100% PRINCIPAL PROTECTION FOR THE PARTICIPANT, BOTH WHILE LIVING AND AT DEATH. FURTHER, FROM MEMORY, THE INITIAL PORTFOLIO THAT MR. RUDE AGREED ON HAS HELD UP EXTREMELY WELL DURING THIS MARKET DECLINE. PLEASE NOTE THAT BOTH AIG AND SAI HAVE FOUND NO MERIT TOWARDS THIS CLAIM. THE STATE OF NEVADA, I BELIVE, ALSO HAS DISCOVERED NO WRONG DOING.

#### Disclosure 4 of 4

|                                                                            |                                                                     |
|----------------------------------------------------------------------------|---------------------------------------------------------------------|
| <b>Reporting Source:</b>                                                   | Firm                                                                |
| <b>Employing firm when activities occurred which led to the complaint:</b> | ROYAL ALLIANCE                                                      |
| <b>Allegations:</b>                                                        | ALLEGE UNSUITABLE INVESTMENTS IN SUB-ACCOUNTS OF A VARIABLE ANNUITY |
| <b>Product Type:</b>                                                       | Annuity-Variable                                                    |
| <b>Alleged Damages:</b>                                                    | \$30,000.00                                                         |
| <b>Alleged Damages Amount Explanation (if amount not exact):</b>           | NO STATEMENT OF ALLEGED DAMAGES; INVESTMENT AMOUNT SHOWN            |
| <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>        | 04/23/2003                                   |
| <b>Complaint Pending?</b>              | No                                           |
| <b>Status:</b>                         | Denied                                       |
| <b>Status Date:</b>                    | 08/21/2003                                   |
| <b>Settlement Amount:</b>              |                                              |
| <b>Individual Contribution Amount:</b> |                                              |
| <b>Firm Statement</b>                  | THE COMPLAINT WAS FOUND TO BE WITHOUT MERIT. |



**Reporting Source:** Broker

**Employing firm when activities occurred which led to the complaint:** ROYAL ALLIANCE ASSOCIATES, INC

**Allegations:** ALLEGE UNSUITABLE INVESTMENTS INSUB ACCOUNTS OF VARIABLE ANNUITY.

**Product Type:** Annuity(ies) - Variable

**Alleged Damages:** \$30,000.00

### **Customer Complaint Information**

**Date Complaint Received:** 04/23/2003

**Complaint Pending?** Yes

**Settlement Amount:**

**Individual Contribution Amount:**

## End of Report



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