

BrokerCheck Report

HUGH ORDWAY BARNDOLLAR III

CRD# 3027317

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When communicating online or investing with any professional, make sure you know who you're dealing with. <u>Imposters</u> might link to sites like BrokerCheck from <u>phishing</u> or similar scam websites, or through <u>social media</u>, 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



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.

www.finra.org/brokercheck User Guidance

HUGH O. BARNDOLLAR III

CRD# 3027317

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:

- 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):

- B CROWN CAPITAL SECURITIES, L.P. CRD# 6312 LAND O' LAKES, FL 03/2013 - 12/2021
- B NEWPORT COAST SECURITIES, INC. CRD# 16944 ODESSA, FL 07/2008 - 04/2013
- J.P. TURNER & COMPANY, L.L.C. CRD# 43177 NEW PORT RICHEY, FL 07/2007 - 08/2008

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:

Туре	Count	
Regulatory Event	2	
Investigation	1	
Customer Dispute	13	

Investment Adviser Representative Information

The information below represents the individual's record as a broker. For details on this individual's record as an investment adviser representative, visit the SEC's Investment Adviser Public Disclosure website at

https://www.adviserinfo.sec.gov

www.finra.org/brokercheck
User Guidance

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. 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

Exan	1	Category	Date
В	General Securities Principal Examination	Series 24	06/01/2007

General Industry/Product Exams

Exam		Category	Date
B	Securities Industry Essentials Examination	SIE	10/01/2018
B	General Securities Representative Examination	Series 7	12/21/2006
B	Futures Managed Funds Examination	Series 31	11/06/1998

State Securities Law Exams

Exam		Category	Date
IA	Uniform Investment Adviser Law Examination	Series 65	01/25/2007
B	Uniform Securities Agent State Law Examination	Series 63	08/28/2006

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/.

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User Guidance

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:

Reg	istration Dates	Firm Name	CRD#	Branch Location
B	03/2013 - 12/2021	CROWN CAPITAL SECURITIES, L.P.	6312	LAND O' LAKES, FL
B	07/2008 - 04/2013	NEWPORT COAST SECURITIES, INC.	16944	ODESSA, FL
B	07/2007 - 08/2008	J.P. TURNER & COMPANY, L.L.C.	43177	NEW PORT RICHEY, FL
B	06/2007 - 07/2007	CALTON & ASSOCIATES, INC.	20999	OCALA, FL
B	01/2007 - 06/2007	BROOKSTREET SECURITIES CORPORATION	14667	NEW PORT RICHEY, FL
B	01/2001 - 09/2002	BROOKSTREET SECURITIES CORPORATION	14667	SAN JUAN CAPISTRANO, CA
B	10/1998 - 05/1999	DEAN WITTER REYNOLDS INC.	7556	PURCHASE, NY
В	04/1998 - 11/1998	BROOKSTREET SECURITIES CORPORATION	14667	SAN JUAN CAPISTRANO, CA

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
04/2014 - Present	PUREPATH WEALTH MANAGEMENT	INVESTMENT ADVISOR REPRESENTATIVE	Υ	LAND O' LAKES, FL, United States
03/2013 - 12/2021	CROWN CAPITAL SECURITIES, L.P.	FINANCIAL ADVISOR	Υ	ORANGE, CA, United States
01/2007 - 08/2020	BARNDOLLAR FINANCIAL	PRESIDENT	Υ	LAND O LAKES, FL, United States

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Registration and Employment History



Other Business Activities

This section includes information, if any, as provided by the broker regarding other business activities the broker is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious or fraternal and is recognized as tax exempt.

(1)START DATE 1992, I'M AN INDEPENDENT CONTRACTOR FOR BARNDOLLAR INSURANCE. I DEVOTE 4 HRS/MO TO THIS NON-INVESTMENT RELATED ACTIVITY, MY DUTIES INCLUDE SELLING INSURANCE RELATED PRODUCTS. (2)START DATE 2014, I'M THE OWNER OF RENTAL PROPERTY. I DEVOTE 0 HRS/MO TO THIS NON INVESTMENT RELATED ACTIVITY, MY DUTIES INCLUDE RENTING HOUSE OUT. (3) START DATE 2013, I'M AN IAR OF PUREPATH WEALTH MGMT/ STIRLING. I DEVOTE 5 HRS/MO OF TRADING HOURS TO THIS INVESTMENT RELATED ACTIVITY, MY DUTIES AS IAR FOR AN OUTSIDE RIA. BUSINESS ADDRESS FOR ABOVE: 2719 LETAP CT.,#102, LAND O' LAKES, FL 34638 (4) START DATE 10/2021 I DEVOTE 10 HRS/MO AS TREASURER FOR HOT ROCKS PIZZA. THIS IS NOT AN INVESTMENT RELATED ACTIVITY AND MY DUTIES INCLUDE HELPING TO RUN PIZZA RESTAURANT. BUSINESS LOCATION: 8601 N DALE MABRY HWY., TAMPA, FL 33614

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.
- 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.

3. Disclosure events in BrokerCheck reports come from different sources:

 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.

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
Customer Dispute	1	12	N/A
Investigation	1	N/A	N/A

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Disclosure Event Details

When evaluating this information, please keep in mind that a discloure 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

Regulatory Action Initiated FINRA

By:

Sanction(s) Sought:

Date Initiated: 11/22/2022

Docket/Case Number: 2021071745801

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

Crown Capital Securities, L.P.

Product Type: Other: private securities transactions

Allegations: Without admitting or denying the findings, Barndollar consented to the sanctions

and to the entry of findings that he participated in unapproved private securities transactions totaling \$1,418,108. The findings stated that in addition to serving as a registered representative of his member firm, Barndollar also provided asset management services as an investment advisor representative. Barndollar's firm placed him on heightened supervision due to customer arbitrations that were initiated involving alleged sales practice violations. The heightened supervision plan prohibited Barndollar from selling alternative investments through the firm. Barndollar, however, participated in sales of \$742,058 in alternative investments after the heighten supervision plan began through a registered investment advisory firm. Most of the investors were firm customers. Barndollar participated in the

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transactions by recommending and/or facilitating the investments, including by meeting with the investors to discuss the investments and assisting them with documentation. Barndollar's advisory clients paid advisory fees to the advisory firm on the assets held in their advisory accounts, including the alternative investments that Barndollar recommended and/or facilitated. Barndollar disclosed his advisory firm as an OBA to his firm, stating that he managed accounts on a fee-based platform that involved third-party money managers. While the firm approved of this OBA, Barndollar did not provide it with prior written notice of his participation in the sale of alternative investments through the advisory firm or obtain the firm's written approval to sell those investments. Furthermore, Barndollar falsely certified on multiple firm annual compliance questionnaires that he had not engaged in any private securities transactions that had not been previously disclosed and approved by the firm.

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: 11/22/2022

Sanctions Ordered: Civil and Administrative Penalty(ies)/Fine(s)

Suspension

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



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

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



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

Sanction 1 of 1

Sanction Type: Suspension

Capacities Affected: All Capacities

Duration: two years

Start Date: 12/05/2022

End Date: 12/04/2024

Monetary Sanction 1 of 1

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

Total Amount: \$10,000.00

Portion Levied against

individual:

\$10,000.00

Payment Plan: deferred

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty

waived?

No

Amount Waived:

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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:

STATE OF FLORIDA, OFFICE OF FINANCIAL REGULATION

Sanction(s) Sought: Bar

Cease and Desist

Civil and Administrative Penalty(ies)/Fine(s)

Revocation Suspension

Date Initiated: 02/24/2025

Docket/Case Number: 106428a-S

URL for Regulatory Action:

Employing firm when activity occurred which led to the

regulatory action:

PURE PATH WEALTH MANAGEMENT CORP. F/K/A BARNDOLLAR

INVESTMENT ADVISORY SERVICESINCORPORATED: CROWN CAPITAL LLC:

BARNDOLLAR FINANCIAL INC

Product Type: Other: ALTERNATIVE SECURITIES

Allegations: BARNDOLLAR IS SUBJECT TO THE REVOCATION, RESTRICTION OR

SUSPENSION OF REGISTRATION BY BEING SUBJECT TO AN AWC IN FINRA AND FAILED TO TIMELY AMEND U4 FORM FOR A WRITTEN COMPLAINT AND

ARBITRATION SETTELEMENT

Current Status: Pending

Regulator Statement ON FEBRUARY 24, 2025, THE OFFICE OF FINANCIAL REGULATION

("OFFICE") FILED AN ADMINISTRATIVE COMPLAINT AND NOTICE OF RIGHTS IN THE MATTER OF HUGH ORDWAY BARNDOLLAR III ("BARNDOLLAR"). BARNDOLLAR MAY REQUEST A HEARING TO CONTEST THIS ACTION FILED BY THE OFFICE. THE REQUEST FOR SUCH A HEARING MUST COMPLY WITH

THE PROVISIONS OF RULES 28-106.2015 AND 28-106.104, FLORIDA

ADMINISTRATIVE CODE. A WRITTEN RESPONSE MUST BE FILED WITHIN TWENTY-ONE (21) DAYS AFTER THE RECEIPT OF THE ADMINISTRATIVE

COMPLAINT.

Reporting Source: Firm



Regulatory Action Initiated

By:

State of Florida

106428a-S

Sanction(s) Sought:

Docket/Case Number:

Date Initiated: 02/24/2025

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

PurePath Wealth Management

Product Type: Other: U4 non filing

Allegations: Accused of not fiing u4 in timely manner

Current Status: Pending

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?

No



(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

Nο

(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?

Nο

Firm Statement

Old Broker Dealer put in the information for the U-4 and often we did not even know about the arbitration until after we saw it on Broker Check

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Investigation

This type of disclosure event involves any ongoing formal investigation by an entity such as a grand jury state or federal agency, self-regulatory organization or foreign regulatory authority. Subpoenas, preliminary or routine regulatory inquiries, and general requests by a regulatory entity for information are not considered investigations and therefore are not included in a BrokerCheck report.

Disclosure 1 of 1

Reporting Source: Firm

Initiated By: State of Florida, Office of Financial Regulation

Notice Date: 02/24/2025

Details: Accused to failure to timely file and amend U4 for a written complaint and

arbitration settlement

Is Investigation pending? Yes



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 12

Reporting Source: Firm

Employing firm when activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, L.P.

Allegations:

Customer alleges lack adequate due diligence, negligence and misrepresentations and omissions of material facts in regards to transactions in a non-traded REIT

Product Type: Real Estate Security

Alleged Damages: \$0.00

Is this an oral complaint? No

Is this a written complaint? No

Is this an arbitration/CFTC reparation or civil litigation?

Arbitration/Reparation forum

or court name and location:

Docket/Case #: 20-02107

Filing date of

07/02/2020

Yes

FINRA

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 07/28/2020

Complaint Pending? No

Status: Settled

Status Date: 05/20/2022

Settlement Amount: \$36,000.00

Individual Contribution

\$0.00

Amount:

Disclosure 2 of 12



Reporting Source: Firm

Employing firm when activities occurred which led to the complaint:

CROWN CAPITAL SECURITIES, L.P.

Allegations:

Claimants allege breach of fiduciary duty, negligence and lack of suitability in

regard to recommendations in alternative products.

Product Type:

Real Estate Security

Alleged Damages:

\$20,000.00

Is this an oral complaint?

Nο

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 #:

24-00759

Filing date of

04/08/2024

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 04/25/2024

Complaint Pending?

No

Status Date:

Status:

Settled

05/19/2025

Settlement Amount:

\$10,000.00

Individual Contribution

\$0.00

Amount:

Reporting Source: Firm

Employing firm when activities occurred which led CROWN CAPITAL SECURITIES, L.P.

to the complaint:

Allegations: Claimants allege breach of fiduciary duty, negligence and lack of suitability in



regard to recommendations in alternative products.

Product Type: Other: Non-Traded REIT

Alleged Damages: \$20,000.00

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 #:

24-00759

Filing date of

04/08/2024

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 04/25/2024

Complaint Pending?

Yes

Settlement Amount:

Individual Contribution

Amount:

Firm Statement

Claimants dismissed respondent Mr. Barndollar from the case on May 24, 2024.

Disclosure 3 of 12

Reporting Source: Firm

Employing firm when

activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, L.P.

Allegations: The customer alleges flawed recommendations, misrepresentation, omissions,

negligent advice, lack of proper due diligence and failure to supervise in regard to

transactions in alternative investments.

Product Type: Direct Investment-DPP & LP Interests

Alleged Damages: \$50,000.00

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 #: 24-00127

Filing date of

01/18/2024

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 02/22/2024

Complaint Pending?

No

Status: Settled

Status Date: 06/13/2025

Settlement Amount: \$11,500.00

Individual Contribution

\$0.00

Amount:

Reporting Source: Firm

Employing firm when activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, L.P.

Allegations: The customer alleges flawed recommendations, misrepresentations, omissions,

negligent advice, lack of proper due diligence and failure to supervise in regard to

transactions in alternative investments.

Product Type: Direct Investment-DPP & LP Interests

Other: NON-TRADED REIT

Alleged Damages: \$50,000.00

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

FINRA

or court name and location:

Docket/Case #: 24-00127

Filing date of

01/18/2024

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 02/22/2024

Complaint Pending?

Yes

Settlement Amount:

Individual Contribution

Amount:

Reporting Source: Broker

Employing firm when

activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, L.P.

Allegations: THE CUSTOMER ALLEGES FLAWED RECOMMENDATIONS,

MISREPRESENTATION, OMISSIONS, NEGLIGENT ADVICE, LACK OF PROPER

DUE DILIGENCE AND FAILURE TO SUPERVISE IN REGARD TO

TRANSACRIONS IN ALTERNATIVE INVESTMENTS.

Product Type: Other: NON-TRADED REIT

Alleged Damages: \$50,000.00

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation?

Yes

Arbitration/Reparation forum or court name and location:

FINRA

Docket/Case #: 24-00127

Filing date of arbitration/CFTC reparation

or civil litigation:

01/18/2024



Customer Complaint Information

Date Complaint Received: 02/22/2024

Complaint Pending? Yes

Settlement Amount:

Individual Contribution

Amount:

Disclosure 4 of 12

Reporting Source: Firm

Employing firm when

activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, L.P.

Allegations: The customer alleges lack of suitability, misrepresentations and omissions and

failure to supervise in regards to investments made on behalf of the customer.

Product Type: Direct Investment-DPP & LP Interests

Oil & Gas

Alleged Damages: \$50,000.00

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 #: 23-00599

Filing date of

03/10/2023

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 03/20/2023

Complaint Pending? No

Status: Settled

Status Date: 03/29/2024



Settlement Amount: \$12,500.00

Individual Contribution

\$0.00

Amount:

Reporting Source: Broker

Employing firm when activities occurred which led

CROWN CAPITAL SECURITIES, L.P.

to the complaint:

Allegations:

THE CUSTOMER ALLEGES LACK OF SUTABILITY, MISRERESENTATIONS

AND OMISSIONS AND FAILURE TO SUPERVISE IN REGARD TO

INVESTMENTS MADE ON BEHALF OF THE CUSTOMER.

Product Type: Oil & Gas

Alleged Damages: \$50,000.00

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 #:

23-00599

Filing date of

03/10/2023

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 03/20/2023

Complaint Pending?

Yes

Settlement Amount:

Individual Contribution

Amount:

Disclosure 5 of 12

Reporting Source: Firm



Employing firm when activities occurred which led to the complaint:

CROWN CAPITAL SECURITIES, L.P.

Allegations:

Customers allege lack of suitability and failure to conduct proper due diligence in

regards to the purchase of alternative investments

Product Type:

Real Estate Security

Alleged Damages:

\$0.00

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 #:

Filing date of

21-00838

03/30/2021

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 04/14/2021

Complaint Pending? No

Status: Settled

Status Date: 12/14/2021

Settlement Amount: \$35,000.00

Individual Contribution

Amount:

\$0.00

Reporting Source: Broker

Employing firm when activities occurred which led CROWN CAPITAL SECURITIES, L.P.

to the complaint:

Allegations: Customers allege lack of suitability and failure to conduct proper due diligence in

regards to the purchase of alternative investments.



Product Type: Other: Non-Traded REIT & Non-Traded BDC

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact):

Not stated, however is expected to be over \$5,000.00

Is this an oral complaint?

No

Is this a written complaint?

Nο

Is this an arbitration/CFTC reparation or civil litigation?

Yes

Arbitration/Reparation forum or court name and location:

FINRA

Docket/Case #:

21-00838

Filing date of

03/30/2021

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 04/14/2021

Complaint Pending?

Status: Settled

Status Date: 12/14/2021

Settlement Amount: \$35,000.00

Individual Contribution

Amount:

\$0.00

No

Broker Statement Despite the allegations in the Statement of Claim, Mr. Barndollar was not the

financial advisor for Claimants. Mr. Barndollar intends to vigorously defend this

claim.

Disclosure 6 of 12

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint:

CROWN CAPITAL SECURITIES, L.P.



Allegations: Customers allege they were sold alternative investments that underperformed

Product Type: Direct Investment-DPP & LP Interests

Alleged Damages: \$0.00

Is this an oral complaint? No

Is this a written complaint? Nο

Is this an arbitration/CFTC

reparation or civil litigation?

Arbitration/Reparation forum or court name and location:

FINRA

05/13/2020

Yes

Docket/Case #: NA

Filing date of

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 05/13/2020

Complaint Pending? No

Status: Settled

Status Date: 03/19/2021

Settlement Amount: \$160,000.00

Individual Contribution \$0.00

Amount:

Reporting Source: Broker

Employing firm when activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, L.P.

Allegations: Customers allege they were sold alternative investments that underperformed

Product Type: Direct Investment-DPP & LP Interests

Other: Non-Traded REIT; Non-Traded BDC

Alleged Damages: \$0.00

Alleged Damages Amount ALLEDGED DAMAGES WERE NOT SPECIFIED UNTIL SETTLEMENT



Explanation (if amount not

exact):

MEDIATION

Is this an oral complaint?

Nο

Is this a written complaint?

Yes

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

Customer Complaint Information

Date Complaint Received: 05/13/2020

Complaint Pending?

No

Settled

Status Date:

03/19/2021

Settlement Amount:

\$160,000.00

Individual Contribution

\$0.00

Amount:

Status:

Disclosure 7 of 12

Reporting Source:

Firm

Employing firm when

activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, L.P.

Allegations: Customer alleges lack of suitability, negligence, misrepresentations and omissions

of material facts in regards to transactions in nontraditional, alternative and/or

nontraded REIT investments.

Product Type: Direct Investment-DPP & LP Interests

Alleged Damages: \$0.00

Is this an oral complaint? Nο

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 #:

20-02683



Filing date of

08/26/2020

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 08/28/2020

Complaint Pending? No

Status: Settled

Status Date: 09/03/2021

Settlement Amount: \$25,000.00

Individual Contribution

Amount:

exact):

\$0.00

Reporting Source: Broker

Employing firm when activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, LP

Allegations: CUSTOMER ALLEGES LACK OF SUITABILITY, NEGLIGENCE,

MISREPRESENTATIONS AND OMISSIONS OF MATERIAL FACTS IN REGARDS TO TRANSACTIONS IN NONTRADITIONAL, ALTERNATIVE AND/OR NON-

TRADED REIT INVESTMENTS.

Product Type: Direct Investment-DPP & LP Interests

Other: NON-TRADED REIT

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not

ALLEGED DAMAGES ARE NOT SPECIFIED, HOWEVER THE AMOUNT IS

EXPECTED TO EXCEED \$5,000

Is this an oral complaint? No

No

Is this an arbitration/CFTC reparation or civil litigation?

Is this a written complaint?

Yes

Arbitration/Reparation forum or court name and location:

FINRA



Docket/Case #: 20-02683

Filing date of arbitration/CFTC reparation

or civil litigation:

08/26/2020

Customer Complaint Information

Date Complaint Received: 08/28/2020

Complaint Pending? No

Status: Settled

Status Date: 09/03/2021

Settlement Amount: \$25,000.00

Individual Contribution

Amount:

\$0.00

Broker Statement The Financial Advisor denies the baseless allegations set forth in the Statement of

Claim. The client was thoroughly educated on the risks associated with the investments and has other similar investments. The Financial Advisor intends to

vigorously defend this allegation.

Disclosure 8 of 12

Reporting Source: Firm

Employing firm when

activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, L.P.

Allegations: Customer alleges lack adequate due diligence, negligence and misrepresentations and omissions of material facts in regards to transactions in a non-traded REIT.

Product Type: Other: NON-TRADED REIT

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact):

AMOUNT EXPECTED TO EXCEED \$5,000

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

FINRA

or court name and location:

Docket/Case #: 20-02107

Filing date of

07/02/2020

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 07/23/2020

Complaint Pending? No

Status: Settled

Status Date: 05/20/2022

Settlement Amount: \$36,000.00

Individual Contribution \$0.00

Amount:

Reporting Source: Broker

Employing firm when activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, LP

Allegations: Customer alleges lack adequate due diligence, negligence and misrepresentations

and omissions of material facts in regards to transactions in a non-traded REIT.

Product Type: Other: NON-TRADED REIT

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not

exact):

AMOUNT EXPECTED TO EXCEED \$5,000

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 #: 20-02107

Filing date of

07/02/2020

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 07/23/2020

Complaint Pending? No

Status: Settled

Status Date: 05/20/2022

\$36,000.00 **Settlement Amount:**

Individual Contribution

Amount:

Disclosure 9 of 12

Reporting Source: Firm

Employing firm when activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, L.P.

Customer alleges lack of due proper due diligence, breach of fiduciary duty and Allegations:

suitability obligations as it relates to the purchase of illiquid alternative investments

Product Type: Direct Investment-DPP & LP Interests

\$0.00

Alleged Damages: \$125,000.00

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

06/01/2020

Docket/Case #: 20-01711

Filing date of arbitration/CFTC reparation

or civil litigation:



Customer Complaint Information

Date Complaint Received: 06/09/2020

Complaint Pending? No

Status: Settled

Status Date: 06/16/2021

Settlement Amount: \$45,000.00

Individual Contribution \$0.00

Amount:

Reporting Source: Broker

Employing firm when

activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, LP

Allegations: The customer alleges lack of due proper due diligence, breach of fiduciary duty

and suitability obligations as it relates to the purchase of illiquid alternative

investments.

Product Type: Direct Investment-DPP & LP Interests

Yes

Alleged Damages: \$125,000.00

Is this an oral complaint? No

Is this a written complaint? No

Is this an arbitration/CFTC

reparation or civil litigation?

Arbitration/Reparation forum FINRA

or court name and location:

Docket/Case #: 20-01711

Filing date of 06/01/2020

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 06/09/2020

Complaint Pending? No



Status: Settled

Status Date: 06/16/2021

Settlement Amount: \$45,000.00

Individual Contribution

Amount:

\$0.00

My firm settled this case to avoid further litigation expense. While the settlement **Broker Statement**

released me from any claims arising from the allegations or the transactions in the account. I was not asked to contribute to the settlement and I neither did contribute nor did I provide a release to the claimants as part of the settlement. I would not have contributed to the settlement if asked, because the claims as to customer-

specific suitability had no merit.

Disclosure 10 of 12

Reporting Source: Firm

Employing firm when activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, L.P.

Allegations: Claimant alleges lack of suitability, breech of contract and lack of proper due

diligence for two alternative investments purchased April 2018.

Product Type: Direct Investment-DPP & LP Interests

Alleged Damages: \$100,100.00

Is this an oral complaint? Nο

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 #: 20-00201

Filing date of

arbitration/CFTC reparation

or civil litigation:

01/17/2020

Customer Complaint Information

Date Complaint Received: 04/09/2020



Complaint Pending? No

Status: Settled

Status Date: 09/02/2020

Settlement Amount: \$37,500.00

Individual Contribution

Amount:

\$0.00

Reporting Source: Broker

Employing firm when activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, LP

Allegations: The claimant alleges lack of suitability, breach of contract and lack of proper due

diligence for two alternative investments purchased April 2018.

Direct Investment-DPP & LP Interests **Product Type:**

Alleged Damages: \$100,100.00

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 #: 20-00201

Filing date of arbitration/CFTC reparation

or civil litigation:

01/17/2020

Customer Complaint Information

Date Complaint Received: 04/09/2020

Complaint Pending? No

Status: Settled

Status Date: 09/02/2021

Settlement Amount: \$37,500.00



Individual Contribution

Amount:

\$0.00

Broker Statement

I feel the investments were suitable for my client because they matched her financial goals and needs at the time she invested. We presented multiple investments to the client and educated her on the pros and cons of all the investment options including lack of liquidity. The client chose the investments she felt matched her needs the best and we moved forward, accordingly. I also dispute the allegation that the client, at the time of the complaint, has suffered a loss in her portfolio. In addition, I acted only in a supervisory role with this client and I am not on the applications at all in a representative capacity so I should not have my name associated with this action.

Disclosure 11 of 12

Reporting Source: Firm

Employing firm when activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, L.P.

Allegations: Claimant alleges negligence in the handling of their account and the

> recommendation of financial investments, breech of fiduciary duty and negligent supervision by crown capital in following its brokers to conduct inadequate due

diligence

Direct Investment-DPP & LP Interests **Product Type:**

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 #: 19-01972

Filing date of arbitration/CFTC reparation

or civil litigation:

07/16/2019

Customer Complaint Information

Date Complaint Received: 07/18/2019



Complaint Pending? No

Settled Status:

Status Date: 05/20/2020

Settlement Amount: \$30,000.00

Individual Contribution

Amount:

\$0.00

Reporting Source: Broker

Employing firm when

activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, L.P.

CLAIMANT ALLEGES NEGLIGENCE IN THE HANDLING OF THEIR ACCOUNT Allegations:

> AND THE RECOMMENDATION OF FINANCIAL INVESTMENTS; BREACH OF FIDUCIARY DUTY AND NEGLIGENT SUPERVISION BY CROWN CAPITAL IN ALLOWING IT'S BROKERS TO CONDUCT INADEQUATE DUE DILIGENCE.

Direct Investment-DPP & LP Interests **Product Type:**

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

FINRA

Arbitration/Reparation forum or court name and location:

Docket/Case #: 19-01972

Filing date of

07/16/2019

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 07/18/2019

Complaint Pending? No

Status: Settled

Status Date: 05/20/2020



Settlement Amount: \$30,000.00

Individual Contribution

\$0.00

No

Amount:

Disclosure 12 of 12

Reporting Source: Regulator

Employing firm when

activities occurred which led

to the complaint:

NEWPORT COAST SECURITIES, INC., J.P. TURNER & COMPANY, LLC

Allegations: SALE OF UNREGISTERED SECURITIES; FRAUD; BREACH OF CONTRACT;

BREACH OF FIDUCIARY DUTY; NEGLIGENCE; GROSS NEGLIGENCE

Product Type: Other: UNREGISTERED SECURITIES, PRIVATE PLACEMENTS

FINRA - CASE #10-03911

Alleged Damages: \$76,427.03

Arbitration Information

Arbitration/Reparation Claim

filed with and Docket/Case

No.:

Date Notice/Process Served: 08/26/2010

Arbitration Pending?

Disposition: Dismissed Disposition Date: 03/21/2011

Disposition Detail: ON OR ABOUT MARCH 21, 2011, CLAIMANTS NOTIFIED FINRA OF THEIR

DISMISSAL WITH PREJUDICE OF RESPONDENT BARNDOLLAR.

Reporting Source: Firm

Employing firm when

activities occurred which led

to the complaint:

Allegations:

J.P. TURNER & COMPANY AND NEWPORT COAST SECURITIES, INC.

UNSUITABILITY, NEGLIGENCE, FRAUD, MISREPRESENTATION AND BREACH

OF FIDUCIARY DUTY.

Product Type: Annuity-Variable

Oil & Gas

Alleged Damages: \$124,800.00



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: 05/10/2010

Complaint Pending? No

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

Status Date: 09/14/2010

Settlement Amount:

Individual Contribution

Amount:

Arbitration Information

Arbitration/CFTC reparation

claim filed with (FINRA, AAA,

CFTC, etc.):

FINRA

Docket/Case #: CASE #10-03911

Date Notice/Process Served: 09/14/2010

Arbitration Pending? No

Disposition: Settled

Disposition Date: 08/26/2011 **Monetary Compensation**

Amount:

Amount:

\$47,500.00

Individual Contribution \$0.00

Reporting Source: Broker

Employing firm when activities occurred which led

to the complaint:

JP TURNER & COMPANY/NEWPORT COAST SECURITIES

Allegations: ALLEGED UNSUITABILITY, ALLEGED NEGLIGENCE, ALLEGED FRAUD,

ALLEGED MISREPRESENTATION AND ALLEGED BREACH OF FIDUCIARY



DUTY.

Product Type: Annuity-Variable

Direct Investment-DPP & LP Interests

Alleged Damages: \$124,800.00

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: 05/10/2010

Complaint Pending? No

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

Status Date: 09/10/2010

Settlement Amount:

Individual Contribution

Amount:

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA,

CFTC, etc.):

FINRA

Docket/Case #: <u>10-03911</u>

Date Notice/Process Served: 09/10/2010

Arbitration Pending? No

Disposition: Settled

Disposition Date: 01/25/2011

Monetary Compensation

Amount:

\$47,500.00

Individual Contribution

\$0.00

Amount:

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Customer Dispute - Pending

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

Disclosure 1 of 1

Reporting Source: Firm

Employing firm when activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, L.P.

Allegations: Customer alleges lack suitability, negligence and misrepresentations and

omissions of material facts in regards to transactions in alternative and variable

annuity investments

Product Type: Annuity-Variable

Direct Investment-DPP & LP Interests

Alleged Damages: \$0.00

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 #: 20-2551

Filing date of

08/11/2020

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 07/30/2021

Complaint Pending? No

Status: Settled

Status Date: 07/30/2021

Settlement Amount: \$82,500.00



Individual Contribution \$0.00

Amount:

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint:

CROWN CAPITAL SECURITIES, L.P.

Allegations: Customer alleges lack suitability, negligence and misrepresentations and

omissions of material facts in regards to transactions in alternative and variable

annuity investments.

Product Type: Annuity-Variable

Direct Investment-DPP & LP Interests

Oil & Gas

Other: NON-TRADED REIT

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact):

FIRM HAS GOOD FAITH THAT AMOUNT WILL EXCEED \$5,000

Is this an oral complaint?

Is this a written complaint? No

Is this an arbitration/CFTC reparation or civil litigation?

Yes

No

Arbitration/Reparation forum or court name and location:

FINRA

Docket/Case #: 20-2551

Filing date of

arbitration/CFTC reparation

or civil litigation:

08/11/2020

Customer Complaint Information

Date Complaint Received: 08/11/2020

Complaint Pending? No

Status: Settled

Status Date: 07/30/2021



Settlement Amount: \$82,500.00

Individual Contribution

\$0.00

Amount:

Reporting Source: Broker

Employing firm when activities occurred which led

to the complaint:

CROWN CAPITAL SECURITIES, LP

Allegations: Customer alleges lack suitability, negligence and misrepresentations and

omissions of material facts in regards to transactions in alternative and variable

annuity investments.

Product Type: Annuity-Variable

Direct Investment-DPP & LP Interests

Oil & Gas

Other: NON-TRADED REIT

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact):

FIRM HAS GOOD FAITH THAT AMOUNT WILL EXCEED \$5,000

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA,

CFTC, etc.):

FINRA

Docket/Case #: 20-02551

Date Notice/Process Served: 08/11/2020

Arbitration Pending? Yes

Broker Statement I deny all the allegations in this complaint. My father, who I worked with and the

client were good friends and he and his wife were long time clients of my father. Unfortunately, both my father and the client have both passed away and the children are filing this complaint even after they did not take the advice that we

have given them.

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End of Report



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