

BrokerCheck Report

CHRIS BLAINE PALKOWITSH

CRD# 3090435

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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.

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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**

CHRIS B. PALKOWITSH

CRD# 3090435

This broker is not currently registered.

Report Summary for this Broker



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

Broker Qualifications

This broker is not currently registered.

This broker has passed:

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

Registration History

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

- **EQUINOX SECURITIES, INC.** CRD# 145790 REDLANDS, CA 05/2008 - 08/2013
- R ZECCO TRADING, INC. CRD# 135398 ONTARIO, CA

09/2005 - 05/2008

R STERLING FINANCIAL INVESTMENT GROUP, INC. CRD# 41506

BOCA RATON, FL 06/2004 - 09/2005

Disclosure Events

This broker has been involved in one or more disclosure events involving certain final criminal matters, regulatory actions, civil judicial proceedings, or arbitrations or civil litigations.

Are there events disclosed about this broker? Yes

The following types of disclosures have been reported:

Type Count Regulatory Event 1

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User Guidance

Broker Qualifications



Registrations

This section provides the self-regulatory organizations (SROs), states and U.S. territories the broker is currently registered and licensed with, the category of each registration, and the date on which the registration became effective. This section also provides, for each 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 0 principal/supervisory exams, 2 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
No information reported.		
General Industry/Product Exams		

General industry/Product Exams

Exam		Category	Date
B	Futures Managed Funds Examination	Series 31	01/30/1999
B	General Securities Representative Examination	Series 7	12/01/1998

State Securities Law Exams

Exam		Category	Date
IA	Uniform Investment Adviser Law Examination	Series 65	01/26/1999
B	Uniform Securities Agent State Law Examination	Series 63	12/18/1998

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/.

www.finra.org/brokercheck
User Guidance

Broker Qualifications

FINCA

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 securities firms:

Reg	istration Dates	Firm Name	CRD#	Branch Location
B	05/2008 - 08/2013	EQUINOX SECURITIES, INC.	145790	REDLANDS, CA
B	09/2005 - 05/2008	ZECCO TRADING, INC.	135398	ONTARIO, CA
В	06/2004 - 09/2005	STERLING FINANCIAL INVESTMENT GROUP, INC.	41506	BOCA RATON, FL
B	11/2002 - 06/2004	FINANCIAL WEST GROUP	16668	RENO, NV
B	07/2001 - 11/2002	DELTA EQUITY SERVICES CORPORATION	15650	BOLTON, MA
B	11/2002 - 11/2002	ROYAL ALLIANCE ASSOCIATES, INC.	23131	SCOTTSDALE, AZ
В	05/2002 - 05/2002	STERLING FINANCIAL INVESTMENT GROUP, INC.	41506	BOCA RATON, FL
B	12/1998 - 06/2001	MORGAN STANLEY DW INC.	7556	PURCHASE, NY

Employment History

This section provides up to 10 years of an individual broker's employment history as reported by the individual broker on the most recently filed Form U4.

Please note that the broker is required to provide this information only while registered with FINRA or a national securities exchange and the information is not updated via Form U4 after the broker ceases to be registered. Therefore, an employment end date of "Present" may not reflect the broker's current employment status.

Employment	Employer Name	Position	Investment Related	Employer Location
05/2008 - Present	EQUINOX SECURITIES, INC.	REGISTERED REPRESENTATIVE	Υ	PHELAN, CA, United States

Disclosure Events



What you should know about reported disclosure events:

- 1. Disclosure events in BrokerCheck reports come from different sources:
 - As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, their employing firms, and regulators. When more than one source reports information for the same disclosure event, all versions of the event will appear in the BrokerCheck report. The different versions are separated by a solid line with the reporting source labeled.

For your convenience, below is a matrix of the number and status of regulatory 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.

	Final	On Appeal
Regulatory Event	1	0



Disclosure Event Details

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 involves a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations.

Disclosure 1 of 1

Reporting Source: Regulator
Regulatory Action Initiated FINRA

By:

Sanction(s) Sought: Other: N/A

Date Initiated: 07/28/2015

Docket/Case Number: 2012031496501

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

EQUINOX SECURITIES, INC.

Product Type: No Product

Allegations: PALKOWITSH WAS NAMED A RESPONDENT IN A FINRA COMPLAINT

ALLEGING THAT HE ENGAGED IN A MANIPULATIVE, DECEPTIVE AND FRAUDULENT SCHEME BY CHURNING CUSTOMER ACCOUNTS. THE COMPLAINT ALLEGES THAT PALKOWITSH ACTED WITH INTENT TO DEFRAUD AND/OR RECKLESS DISREGARD OF THEIR CUSTOMERS' INTERESTS BY SEEKING TO MAXIMIZE THEIR OWN REMUNERATION IN DISREGARD OF THE INTERESTS OF HIS CUSTOMERS. THE TRADING IN THE ACCOUNTS OF THE CUSTOMERS WAS, AS EVIDENCED BY THE HIGH ANNUALIZED COST-TO-EQUITY RATIOS AND NUMBER OF TRANSACTIONS, EXCESSIVE IN LIGHT OF AND INCONSISTENT WITH THE CUSTOMERS' INVESTMENT OBJECTIVES AND FINANCIAL SITUATIONS. NONE OF THE CUSTOMERS ACQUIESCED OR CONSENTED TO THE HEAVY LEVEL OF

TRADING IN THE ACCOUNTS. THE EFFECT WAS PARTICULARLY

PERNICIOUS BECAUSE SIX OF THE EIGHT ACCOUNTS WERE INDIVIDUAL

RETIREMENT ACCOUNTS THAT CONSTITUTED THE BULK OF THE

CUSTOMERS' RETIREMENT SAVINGS. AFTER THE CUSTOMERS SUSTAINED SUBSTANTIAL LOSSES, PALKOWITSH PLACED THEIR REMAINING EQUITY

AT RISK BY CONCENTRATING EACH ACCOUNT IN A LOW-PRICED

SECURITY. AS A RESULT OF THE EXCESSIVE TRADING AND CHURNING IN



THE ACCOUNTS, EACH OF THE CUSTOMERS SUFFERED EXTENSIVE LOSSES AND PAID EXORBITANT FEES AND COMMISSIONS TO PALKOWITSH. AS A RESULT OF HIS CONDUCT, PALKOWITSH WILLFULLY VIOLATED SECTION 10(B) OF THE SECURITIES EXCHANGE ACT OF 1934 AND RULE 10B-5, NASD RULES 2110 AND 2120, AND FINRA RULES 2010 AND 2020. THE COMPLAINT ALSO ALLEGES THAT PALKOWITSH MADE UNSUITABLE RECOMMENDATIONS TO CUSTOMERS AND LACKED REASONABLE GROUNDS FOR BELIEVING THAT THE CUSTOMERS' UNDERSTOOD AND WERE WILLING AND ABLE TO ASSUME THE RISK PARTICULAR TO HAVING THEIR ACCOUNTS HEAVILY CONCENTRATED IN A SINGLE. LOW-PRICED SECURITY WHERE A SIGNIFICANT LOSS WOULD EFFECTIVELY WIPE OUT THE CUSTOMER'S ENTIRE PRINCIPAL IN THESE ACCOUNTS, MANY OF WHICH WERE THE SOLE RETIREMENT ACCOUNTS FOR THE CUSTOMERS. THE COMPLAINT FURTHER ALLEGES THAT PALKOWITSH FAILED TO TIMELY AMEND HIS FORM U4 TO DISCLOSE FEDERAL TAX LIENS THAT WERE FILED AGAINST HIM.

Current Status: Final

Resolution: Decision & Order of Offer of Settlement

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?

Yes

Resolution Date: 04/18/2016

Sanctions Ordered: Bar (Permanent)

If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise? Yes



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

Yes

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

No



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

Nο

Sanction 1 of 1

Sanction Type: Bar (Permanent)

Capacities Affected: All Capacities

Duration: Indefinite

Start Date: 04/18/2016

End Date:

Regulator Statement

Without admitting or denying the allegations, Palkowitsh consented to the sanction and to the entry of findings that he excessively traded and churned customer accounts. The findings stated that the trading in the accounts of the customers was, as evidenced by the high annualized cost-to-equity ratios and number of transactions, excessive in light of and inconsistent with the customers' investment objectives and financial situations. None of the customers acquiesced or consented to the heavy level of trading in the accounts. The findings also stated that by engaging in unsuitable excess trading with scienter, Palkowitsh engaged in a manipulative, deceptive and fraudulent scheme by churning customer accounts. Palkowitsh acted with intent to defraud and/or reckless disregard of their customers' interests by seeking to maximize their own remuneration in disregard of the interests of his customers. As a result of the excessive trading and churning in the accounts, each of the customers suffered extensive losses and paid exorbitant fees and commissions to Palkowitsh. As a result of his conduct, Palkowitsh willfully violated Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5, NASD Rules 2110 and 2120, and FINRA Rules 2010 and 2020. The findings also included that that Palkowitsh made unsuitable recommendations to customers and



lacked reasonable grounds for believing that the customers' understood and were willing and able to assume the risk particular to having their accounts heavily concentrated in a single, low-priced security where a significant loss would effectively wipe out the customer's entire principal in these accounts, many of which were the sole retirement accounts for the customers. FINRA found that Palkowitsh failed to amend his Form U4 to disclose federal tax liens that were filed against him.

End of Report



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