

BrokerCheck Report

NATHANIEL ROYCE CLAY

CRD# 4525541

| <u>Section Title</u> | <u>Page(s)</u> |
|-------------------------------------|-----------------------|
| Report Summary | 1 |
| Broker Qualifications | 2 - 3 |
| Registration and Employment History | 5 |
| Disclosure Events | 6 |



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

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

About BrokerCheck®

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

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

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

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

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

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

- o information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
- o information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.



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

brokercheck.finra.org



For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources.

[For more information about FINRA, visit www.finra.org.](http://www.finra.org)

Thank you for using FINRA BrokerCheck.

NATHANIEL R. CLAY

CRD# 4525541

This broker is not currently registered.

Report Summary for this Broker



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

Broker Qualifications

This broker is not currently registered.

This broker has passed:

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

Registration History

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

- B LAIDLAW & COMPANY (UK) LTD.**
CRD# 119037
NEW YORK, NY
11/2015 - 02/2019
- B NATIONAL SECURITIES CORPORATION**
CRD# 7569
NEW YORK, NY
07/2008 - 11/2015
- B CASIMIR CAPITAL L.P.**
CRD# 105061
NEW YORK, NY
05/2002 - 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:

| Type | Count |
|------------------|-------|
| Regulatory Event | 2 |
| Customer Dispute | 5 |
| Termination | 1 |
| Judgment/Lien | 1 |

Broker Qualifications



Registrations

This section provides the self-regulatory organizations (SROs) and U.S. states/territories the broker is currently registered and licensed with, the category of each license, and the date on which it became effective. This section also provides, for every brokerage firm with which the broker is currently employed, the address of each branch where the broker works.

This broker is not currently registered.



Broker Qualifications

Industry Exams this Broker has Passed

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

This individual has passed 0 principal/supervisory exams, 2 general industry/product exams, and 1 state securities law exam.

Principal/Supervisory Exams

| Exam | Category | Date |
|--------------------------|----------|------|
| No information reported. | | |

General Industry/Product Exams

| Exam | Category | Date |
|--|----------|------------|
| B Securities Industry Essentials Examination | SIE | 10/01/2018 |
| B General Securities Representative Examination | Series 7 | 05/09/2002 |

State Securities Law Exams

| Exam | Category | Date |
|---|-----------|------------|
| B Uniform Securities Agent State Law Examination | Series 63 | 05/24/2002 |

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at www.finra.org/brokerqualifications/registeredrep/.



Broker Qualifications

Professional Designations

This section details that the representative has reported **0** professional designation(s).

No information reported.



Registration and Employment History

Registration History

The broker previously was registered with the following firms:

| Registration Dates | Firm Name | CRD# | Branch Location |
|----------------------------|---------------------------------------|--------|-----------------|
| B 11/2015 - 02/2019 | LAILAW & COMPANY (UK) LTD. | 119037 | NEW YORK, NY |
| B 07/2008 - 11/2015 | NATIONAL SECURITIES CORPORATION | 7569 | NEW YORK, NY |
| B 05/2002 - 08/2008 | CASIMIR CAPITAL L.P. | 105061 | NEW YORK, NY |
| B 11/2002 - 03/2003 | KUHNS BROTHERS SECURITIES CORPORATION | 47331 | LIME ROCK, CT |

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 |
|-------------------|---------------------------------|---------------------------|--------------------|-----------------------------|
| 11/2015 - Present | Laidlaw and Company (UK) Ltd. | REGISTERED REPRESENTATIVE | Y | New York, NY, United States |
| 07/2008 - 11/2015 | NATIONAL SECURITIES CORPORATION | REGISTERED REPRESENTATIVE | Y | NEW YORK, NY, United States |

Other Business Activities

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

No information reported.



Disclosure Events

What you should know about reported disclosure events:

1. All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
 - o A law enforcement agency must file formal charges before a broker is required to disclose a particular criminal event.
 - o A customer dispute must involve allegations that a broker engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.
 - o
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - o As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, brokerage firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
 - o
4. **There are different statuses and dispositions for disclosure events:**
 - o A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - § A "pending" event involves allegations that have not been proven or formally adjudicated.
 - § An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - § A "final" event has been concluded and its resolution is not subject to change.
 - o A final event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - § An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - § A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that brokers and brokerage firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - § A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.

For your convenience, below is a matrix of the number and status of disclosure events involving this broker. Further information regarding these events can be found in the subsequent pages of this report. You also may wish to contact the broker to obtain further information regarding these events.

| | Pending | Final | On Appeal |
|------------------|---------|-------|-----------|
| Regulatory Event | 0 | 2 | 0 |
| Customer Dispute | 0 | 5 | N/A |
| Termination | N/A | 1 | N/A |
| Judgment/Lien | 1 | N/A | N/A |



Disclosure Event Details

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

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

Regulatory - Final

This type of disclosure event may involve (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory such as the Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of a broker's authority to act as an attorney, accountant, or federal contractor.

Disclosure 1 of 2

| | |
|---|---|
| Reporting Source: | Regulator |
| Regulatory Action Initiated By: | FINRA |
| Sanction(s) Sought: | Suspension |
| Date Initiated: | 03/18/2020 |
| Docket/Case Number: | 2020065912101 |
| Employing firm when activity occurred which led to the regulatory action: | N/A |
| Product Type: | No Product |
| Allegations: | Respondent Clay failed to respond to FINRA request for information. |
| Current Status: | Final |
| Resolution: | Letter |
| Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? | No |



Resolution Date: 06/22/2020

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?
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 2

Sanction Type: Bar (Permanent)
Capacities Affected: All capacities
Duration: Indefinite
Start Date: 06/22/2020

End Date:

Sanction 2 of 2

Sanction Type: Suspension
Capacities Affected: All Capacities
Duration: N/A
Start Date: 04/13/2020
End Date: 06/21/2020

Regulator Statement

Pursuant to FINRA Rule 9552(h) and in accordance with FINRA's Notice of Suspension and Suspension from Association letters dated March 18, 2020 and April 13, 2020, respectively, on June 22, 2020, Clay is barred from association with any FINRA member in all capacities. Respondent failed to request termination of his suspension within three months of the date of the Notice of Suspension; therefore, he is automatically barred from association with any FINRA member in all capacities.



Disclosure 2 of 2

| | |
|---|--|
| Reporting Source: | Regulator |
| Regulatory Action Initiated By: | FINRA |
| Sanction(s) Sought: | Suspension |
| Date Initiated: | 08/28/2019 |
| Docket/Case Number: | 15-03187 |
| Employing firm when activity occurred which led to the regulatory action: | n/a |
| Product Type: | No Product |
| Allegations: | Respondent Nathaniel Royce Clay failed to comply with an arbitration award or settlement agreement or to satisfactorily respond to a FINRA request to provide information concerning the status of compliance. |
| Current Status: | Final |
| Resolution: | Letter |
| 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: | 08/28/2019 |
| Sanctions Ordered: | 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: indefinite

Start Date: 08/28/2019

End Date:

Regulator Statement

Pursuant to Article VI, Section 3 of FINRA By-Laws, and FINRA Rule 9554, Respondent Nathaniel Royce Clay is suspended on August 28, 2019, for failure to comply with an arbitration award or settlement agreement or to satisfactorily respond to a FINRA request to provide information concerning the status of compliance.



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 1

| | |
|--|---|
| Reporting Source: | Firm |
| Employing firm when activities occurred which led to the complaint: | CASIMIR CAPITAL L.P. |
| Allegations: | CLIENT ALLEGES EXCESSIVE TRADING AND IMPROPER USE OF MARGIN. CLIENT WAS IN COMPLETE CONTROL OF HIS ACCOUNT AT ALL TIMES. THE CLIENT DIRECTED, AUTHORIZED, AND FUNDED EVERY TRANSACTION THAT WAS EXECUTED IN HIS ACCOUNT. MR. CLAY INTENDS TO DEFEND THE MATTER VIGOROUSLY AND EXPECTS TO PREVAIL. |
| Product Type: | Equity - OTC |
| Alleged Damages: | \$50,000.00 |

Customer Complaint Information

| | |
|---------------------------------|------------------------|
| Date Complaint Received: | 06/18/2008 |
| Complaint Pending? | No |
| Status: | Arbitration/Reparation |
| Status Date: | 04/17/2009 |

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

| | |
|---|----------------------------|
| Arbitration/Reparation Claim filed with and Docket/Case No.: | FINRA CASE NUMBER 08-01947 |
| Date Notice/Process Served: | 06/18/2008 |
| Arbitration Pending? | No |
| Disposition: | Settled |
| Disposition Date: | 04/17/2009 |
| Monetary Compensation Amount: | \$42,000.00 |



Individual Contribution Amount: \$0.00

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: CASIMIR CAPITAL L.P.

Allegations: CLIENT ALLEGES EXCESSIVE TRADING AND IMPROPER USE OF MARGIN. CLIENT WAS IN COMPLETE CONTROL OF HIS ACCOUNT AT ALL TIMES. THE CLIENT DIRECTED, AUTHORIZED, AND FUNDED EVERY TRANSACTION THAT WAS EXECUTED IN HIS ACCOUNT. MR. CLAY INTENDS TO DEFEND THE MATTER VIGOROUSLY AND EXPECTS TO PREVAIL.

Product Type: Equity - OTC

Alleged Damages: \$50,000.00

Customer Complaint Information

Date Complaint Received: 06/18/2008

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 06/18/2008

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: FINRA CASE NUMBER 08-01947

Date Notice/Process Served: 06/18/2008

Arbitration Pending? No

Disposition: Settled

Disposition Date: 04/17/2009

Monetary Compensation Amount: \$42,000.00



Individual Contribution Amount: \$0.00

Broker Statement MR. CLAY WAS NOT INVOLVED IN SETTLEMENT, AND CONTINUES TO DENY THE CUSTOMER'S ALLEGATIONS.



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

| | |
|--|---|
| Reporting Source: | Broker |
| Employing firm when activities occurred which led to the complaint: | NATIONAL SECURITIES CORPORATION |
| Allegations: | EXCESSIVE TRADING |
| Product Type: | Equity-OTC |
| Alleged Damages: | \$5,000.00 |
| Alleged Damages Amount Explanation (if amount not exact): | FIRM HAS MADE A GOOD FAITH DETERMINATION THAT THE DAMAGES FROM THE ALLEGED CONDUCT WOULD BE OVER \$5,000. |
| 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: | 05/13/2010 |
| Complaint Pending? | No |
| Status: | Closed/No Action |
| Status Date: | 05/19/2010 |
| Settlement Amount: | |
| Individual Contribution Amount: | |
| Broker Statement | CLIENT ACKNOWLEDGES PRIOR AUTHORIZATION OF EVERY TRANSACTION. CLIENT IS NOT SEEKING ANY RENUMERATION. WE CONSIDER THIS MATTER CLOSED. |



Disclosure 2 of 4

| | |
|--|---|
| Reporting Source: | Broker |
| Employing firm when activities occurred which led to the complaint: | NATIONAL SECURITIES CORPORATION |
| Allegations: | EXCESSIVE TRADING, CHURNING, AND MISREPRESENTATION. |
| Product Type: | Equity-OTC |
| Alleged Damages: | \$28,208.00 |
| 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: | 05/11/2010 |
| Complaint Pending? | No |
| Status: | Closed/No Action |
| Status Date: | 07/09/2010 |
| Settlement Amount: | |
| Individual Contribution Amount: | |

Disclosure 3 of 4

| | |
|--|--|
| Reporting Source: | Broker |
| Employing firm when activities occurred which led to the complaint: | NATIONAL SECURITIES CORPORATION |
| Allegations: | CHURNING |
| Product Type: | Equity Listed (Common & Preferred Stock) |
| Alleged Damages: | \$60,000.00 |
| Is this an oral complaint? | No |
| Is this a written complaint? | Yes |



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

Customer Complaint Information

Date Complaint Received: 09/18/2009

Complaint Pending? No

Status: Closed/No Action

Status Date: 07/19/2011

Settlement Amount:

**Individual Contribution
Amount:**

Broker Statement THIS IS AN INHERITED ACCOUNT. 90+% OF LOSSES SUSTAINED IN THIS ACCOUNT WERE A RESULT OF PRIOR RECOMMENDATIONS.

Disclosure 4 of 4

Reporting Source: Broker

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

Allegations: CUSTOMER INSTRUCTED HIS REGISTERED REP. NATHANIEL CLAY, TO PURCHASE 2,000 SHARES OF SANDISK CORPORATION, TO SELL 500 SHARES OF GILEAD CORPORATION, AND TO SELL 1,000 SHARES OF NEW YORK COMMUNITY BANCORP. UPON RECEIPT OF AN EMAIL TRADE REPORT, CUSTOMER RESPONDED THAT TWO TRANSACTIONS WERE UNAUTHORIZED.

Product Type: Equity - OTC

Alleged Damages: \$65,000.00

Customer Complaint Information

Date Complaint Received: 09/20/2004

Complaint Pending? No

Status: Closed/No Action

Status Date: 09/18/2004

Settlement Amount:



**Individual Contribution
Amount:**

Broker Statement

IN RESPONSE TO AN INQUIRY THAT RESULTED FROM CUSTOMER'S EMAIL, CUSTOMER ACKNOWLEDGED THAT HE AUTHORIZED THE ACTUAL TRADES AND CONSIDERED THE TRANSACTIONS BONA FIDE. GIVEN THE CLIENT CONFIRMED THAT THE TRANSACTIONS EXECUTED WERE AUTHORIZED AND FURTHER CONFIRMED HIS SATISFACTION, CASIMIR CONSIDERS THIS MATTER CLOSED. ORIGINALLY FILED WITH WRONG RECEIVED DATE.



Employment Separation After Allegations

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

Disclosure 1 of 1

Reporting Source: Firm

Employer Name: NATIONAL SECURITIES CORP

Termination Type: Permitted to Resign

Termination Date: 11/04/2015

Allegations: Regulation S-P Internal Review initiated prior to RR submitting a resignation letter. Internal Review has determined that RR misappropriated non-public customer information. Cease and Desist Order Issued. Internal Review still open.

Product Type: No Product

Reporting Source: Broker

Employer Name: NATIONAL SECURITIES CORP

Termination Type: Permitted to Resign

Termination Date: 11/04/2015

Allegations: Regulation S-P Internal Review initiated prior to RR submitting a resignation letter. Internal Review has determined that RR misappropriated non-public customer information. Cease and Desist Order Issued. Internal Review still open.

Product Type: No Product

Broker Statement

The disclosure by my prior firm is wholly without merit and was made by solely for the purpose of retaliating against me because voluntarily resigned to pursue a different business opportunity. I did not misappropriate any non-public customer information. I was not subject to any post-employment covenants preventing me from continuing my career elsewhere. The firm's actions were designed with the intent to put me at a competitive disadvantage as I begin my employment at my new employer.



Judgment / Lien

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

Disclosure 1 of 1

| | |
|-----------------------------------|-------------------------------------|
| Reporting Source: | Broker |
| Judgment/Lien Holder: | BANK OF AMERICA, N.A. |
| Judgment/Lien Amount: | \$16,174.94 |
| Judgment/Lien Type: | Civil |
| Date Filed with Court: | 03/28/2017 |
| Date Individual Learned: | 06/14/2017 |
| Type of Court: | State Court |
| Name of Court: | Civil Court Of The City Of New York |
| Location of Court: | New York, NY |
| Docket/Case #: | CV-022808-16/NY |
| Judgment/Lien Outstanding? | Yes |

End of Report



This page is intentionally left blank.