

BrokerCheck Report

WILLIAM CHRISTIAN GENNITY

CRD# 4913490

| <u>Section Title</u> | <u>Page(s)</u> |
|-------------------------------------|-----------------------|
| Report Summary | 1 |
| Broker Qualifications | 2 - 3 |
| Registration and Employment History | 5 - 6 |
| Disclosure Events | 7 |

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.

WILLIAM C. GENNITY

CRD# 4913490

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 FIRST STANDARD FINANCIAL COMPANY LLC**
CRD# 168340
STATEN ISLAND, NY
10/2014 - 11/2018
- B ALEXANDER CAPITAL, L.P.**
CRD# 40077
NEW YORK, NY
04/2012 - 10/2014
- B LEGEND SECURITIES, INC.**
CRD# 44952
NEW YORK, NY
03/2011 - 04/2012

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 | 4 |
| Civil Event | 1 |
| Customer Dispute | 8 |

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 | 08/11/2005 |

State Securities Law Exams

| Exam | Category | Date |
|---|-----------|------------|
| B Uniform Securities Agent State Law Examination | Series 63 | 04/18/2006 |

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/.



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 10/2014 - 11/2018 | FIRST STANDARD FINANCIAL COMPANY LLC | 168340 | STATEN ISLAND, NY |
| B 04/2012 - 10/2014 | ALEXANDER CAPITAL, L.P. | 40077 | NEW YORK, NY |
| B 03/2011 - 04/2012 | LEGEND SECURITIES, INC. | 44952 | NEW YORK, NY |
| B 06/2010 - 03/2011 | NATIONAL SECURITIES CORPORATION | 7569 | ISELIN, NJ |
| B 03/2009 - 06/2010 | J.P. TURNER & COMPANY, L.L.C. | 43177 | STATEN ISLAND, NY |
| B 03/2007 - 04/2009 | NATIONAL SECURITIES CORPORATION | 7569 | STATEN ISLAND, NY |
| B 10/2006 - 12/2006 | NATIONAL SECURITIES CORPORATION | 7569 | STATEN ISLAND, NY |
| B 03/2006 - 10/2006 | MERCER CAPITAL LTD. | 104012 | NEW YORK, NY |
| B 02/2006 - 02/2006 | J.P. TURNER & COMPANY, L.L.C. | 43177 | STATEN ISLAND, NY |
| B 10/2005 - 01/2006 | JOSEPH STEVENS & COMPANY, INC. | 35459 | BROOKLYN, 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 |
|-------------------|---------------------------------------|---------------------------|--------------------|-----------------------------|
| 10/2014 - Present | FIRST STANDARD FINANCIAL COMPANY, LLC | INVESTMENT REPRESENTATIVE | Y | NEW YORK, NY, United States |
| 04/2012 - 10/2014 | ALEXANDER CAPITAL, L.P. | REGISTERED REP | Y | NEW YORK, NY, United States |
| 03/2011 - 04/2012 | LEGEND SECURITIES, INC | BROKER | Y | NEW YORK, NY, United States |
| 06/2010 - 03/2011 | NATIONAL SECURITIES CORP | REGISTERED REPRESENTATIVE | Y | ISELIN, NJ, United States |

Registration and Employment History



Employment History, continued

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)STANDARD FINANCING)FIRST STANDARD FINANCE COMPANY 1655 RICHMOND AVE, SUITE B, STATEN ISLAND, NY 10314. BUSINESS FUNDING BROKERAGE. POSITION: FUNDING SPECIALIST 10-15 HOURS PER MONTH OUTSIDE OF MARKET HOURS.
 - 2)WILLIAM CHRISTIAN CONSULTING INC. NON-SECURITIES RELATED; 80 BAY ST. LANDING, APT G. STATEN ISLAND; PURCHASING SMALLL BUSINESS RECIEVABLES; INVESTOR. AS OF 3/26/2018; LESS THAN 2 HOURS PER WEEK- NOT DURING MARKET HOURS.
 - 3)IRON GATES CONSULTING NON SECURITIES RELATED PRESIDENT 80 BAY ST LANDING STATEN ISLAND NY 10301 START DATE 5/2/18 0 HOURS SALES CONSULTANT FOR SMALL BUSINESS
-



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 | 4 | 0 |
| Civil Event | 0 | 1 | 0 |
| Customer Dispute | 2 | 6 | 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 4

| | |
|--|---|
| Reporting Source: | Regulator |
| Regulatory Action Initiated By: | FINRA |
| Sanction(s) Sought: | Suspension |
| Date Initiated: | 08/08/2019 |
| Docket/Case Number: | 18-01386 |
| Employing firm when activity occurred which led to the regulatory action: | N/A |
| Product Type: | No Product |
| Allegations: | Respondent Gennity 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: 08/08/2019

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: | 08/08/2019 |
| End Date: | |

**Regulator Statement**

Pursuant to Article VI, Section 3 of FINRA By-Laws, and FINRA Rule 9554, Respondent Gennity is suspended on August 8, 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.

Disclosure 2 of 4

| | |
|---|--|
| Reporting Source: | Regulator |
| Regulatory Action Initiated By: | FINRA |
| Sanction(s) Sought: | Suspension |
| Date Initiated: | 12/27/2018 |
| Docket/Case Number: | 2018057324501 |
| Employing firm when activity occurred which led to the regulatory action: | N/A |
| Product Type: | No Product |
| Allegations: | Respondent Gennity 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: | 04/01/2019 |
| 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: 04/01/2019

End Date:

Sanction 2 of 2

Sanction Type: Suspension
Capacities Affected: All capacities
Duration: n/a
Start Date: 01/22/2019
End Date: 03/31/2019

Regulator Statement

Pursuant to FINRA Rule 9552(h) and in accordance with FINRA's Notice of Suspension and Suspension from Association letters dated December 27, 2018, and January 22, 2019, respectively, on April 1, 2019, Gennity 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 3 of 4

| | |
|--|---|
| Reporting Source: | Regulator |
| Regulatory Action Initiated By: | UNITED STATES SECURITIES AND EXCHANGE COMMISSION |
| Sanction(s) Sought: | Other: n/a |
| Date Initiated: | 03/04/2019 |
| Docket/Case Number: | 3-19015 |
| Employing firm when activity occurred which led to the regulatory action: | |
| Product Type: | No Product |
| Allegations: | <p>SEC Admin Release 34-85246 / March 4, 2019: The Securities and Exchange Commission ("Commission") deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Section 15(b) of the Securities Exchange Act of 1934 ("Exchange Act") against William C. Gennity ("Respondent"). The Commission finds that on March 1, 2019, a final judgment was entered by consent against Gennity, permanently enjoining him from future violations of Sections 17(a) of the Securities Act of 1933 ("Securities Act"), Section 10(b) of the Exchange Act and Rule 10b-5 thereunder, in the civil action entitled Securities and Exchange Commission v. William C. Gennity and Rocco Roveccio, Civil Action Number 17-CV-7424, in the United States District Court for the Southern District of New York. The Commission's complaint alleged that, during the period from July 2012 to August 2014, Gennity recommended to four customers - Customers 1 through 4 - a pattern of high cost, in-and-out trading without any reasonable basis to believe that his recommendations were suitable for anyone. The Commission's complaint also alleged that: (a) Gennity's recommendations resulted in losses for the customers and ill-gotten gains for Gennity; (b) the recommendations made by Gennity were unsuitable for Customers 1 and 2, as they were incompatible with the customers' financial needs, investment objectives, risk tolerance and circumstances; (c) Gennity concealed material information from and made material misrepresentations to his customers; (d) Gennity churned the accounts of Customers 1 and 2; and (e) Gennity made unauthorized trades in the accounts of Customers 1 through 4.</p> |
| Current Status: | Final |
| Resolution: | Order |



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:

03/04/2019

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: | participating in any offering of a penny stock |
| Duration: | Indefinite |
| Start Date: | 03/04/2019 |
| End Date: | |

Sanction 2 of 2



Sanction Type: Bar (Permanent)

Capacities Affected: association with a broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or NRSRO

Duration: Indefinite

Start Date: 03/04/2019

End Date:

Regulator Statement Respondent has submitted an Offer of Settlement (the "Offer") which the Commission has determined to accept. It is ORDERED that Gennity be, and hereby is barred from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization; and barred from participating in any offering of a penny stock, including: acting as a promoter, finder, consultant, agent or other person who engages in activities with a broker, dealer or issuer for purposes of the issuance or trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock.

Reporting Source: Broker

Regulatory Action Initiated By: UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Sanction(s) Sought: Bar
Cease and Desist
Censure
Disgorgement
Revocation
Suspension

Date Initiated: 02/02/2017

Docket/Case Number: n/a

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

Product Type: Equity Listed (Common & Preferred Stock)

Allegations: Allege violations of 17(a) of Securities Act of 1933 and Section 10(b) Securities Act 1934 and rule 10b-5

Current Status: Pending



| | |
|-----------------------------------|--|
| Action Appealed To: | SEC |
| Date Appeal filed: | 02/27/2017 |
| Appeal Limitation Details: | |
| Resolution: | APPEALING AWC |
| Resolution Date: | |
| Broker Statement | I have filed a comprehensive Wells Submission in response to these allegations detailing why the evidence adduced during the Commission's investigation does not warrant the initiation of any disciplinary action |

Disclosure 4 of 4

| | |
|--|--|
| Reporting Source: | Regulator |
| Regulatory Action Initiated By: | Montana |
| Sanction(s) Sought: | Civil and Administrative Penalty(ies)/Fine(s) Restitution Revocation |
| Date Initiated: | 08/02/2016 |
| Docket/Case Number: | SEC-2016-106 |
| URL for Regulatory Action: | |
| Employing firm when activity occurred which led to the regulatory action: | Alexander Capital, L.P. |
| Product Type: | Equity Listed (Common & Preferred Stock) |
| Allegations: | Excessive trading; unauthorized trading; unauthorized use of margin; discretionary trading without authorization; unsuitable recommendation; charging excessive fees; fraud. |
| Current Status: | Final |
| Resolution: | Order |



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: 10/09/2018

Sanctions Ordered: Other: None

Reporting Source: Broker

Regulatory Action Initiated By: Montana

Sanction(s) Sought: Civil and Administrative Penalty(ies)/Fine(s)
Restitution
Revocation

Date Initiated: 08/02/2016

Docket/Case Number: SEC-2016-106

Employing firm when activity occurred which led to the regulatory action: Alexander Capital, L.P.

Product Type: Equity Listed (Common & Preferred Stock)

Allegations: Excessive trading; unauthorized trading; unauthorized use of margin; discretionary trading without authorization; unsuitable recommendation; charging excessive fees; fraud.

Current Status: Final

Resolution: Order

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: 10/09/2018

Sanctions Ordered: Other: none





Civil - Final

This type of disclosure event involves (1) an injunction issued by a court in connection with investment-related activity, (2) a finding by a court of a violation of any investment-related statute or regulation, or (3) an action brought by a state or foreign financial regulatory authority that is dismissed by a court pursuant to a settlement agreement.

Disclosure 1 of 1

Reporting Source: Regulator

Initiated By: UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Relief Sought: Civil and Administrative Penalty(ies)/Fine(s)
Disgorgement
Injunction
Monetary Penalty other than Fines

Date Court Action Filed: 09/28/2017

Product Type: Other: unspecified securities

Type of Court: Federal Court

Name of Court: United States District Court for the Southern District of New York

Location of Court: New York, NY

Docket/Case #: 1:17-cv-07424

Employing firm when activity occurred which led to the action: Alexander Capital, L.P.

Allegations: The Securities and Exchange Commission, for its Complaint against defendants William C. Gennity ("Gennity") and another individual (together, the "Defendants"), alleges that Gennity and another, as registered representatives from 2012 to 2014 at Alexander Capital, L.P. ("Alexander Capital"), a New York City broker-dealer, violated the antifraud provisions of the federal securities laws. First, the Defendants had a duty to have a reasonable basis for recommendations that they made to their customers. In violation of this duty, Gennity recommended to four customers, and the other defendant recommended to seven customers, a pattern of high cost, in-and-out trading without any reasonable basis to believe that their recommendations were suitable for anyone. These recommendations resulted in losses for the customers and ill-gotten gains for Gennity and the other defendant. Defendants knew or recklessly disregarded that their recommendations, for which they had no reasonable basis, were not suitable for anyone. The Defendant's recommendations were unsuitable for certain of their customers in light of those customers' financial needs, investment objectives and circumstances. Third, the defendants made material misrepresentations and omissions to customers. Fourth, they churned customer accounts. Finally, the



defendants engaged in unauthorized trading. As a result of these violations, Gennity and the other defendant received approximately \$280,000 and \$206,000, respectively, in commissions. The eleven customers suffered losses totaling \$683,038. By virtue of the conduct alleged, the Defendants, directly or indirectly, singly or in concert, violated and are otherwise liable for violations of Section 17(a) of the Securities Act, Section 10(b) of the Exchange Act and Rule 10b-5 thereunder.

Current Status: Final

Resolution: Judgment Rendered

Resolution Date: 03/01/2019

Sanctions Ordered or Relief Granted: Civil and Administrative Penalty(ies)/Fine(s)
Disgorgement
Injunction
Monetary Penalty other than Fines

Capacities 1 of 1

Capacities Affected: n/a

Duration: permanent

Start Date: 03/01/2019

End Date:

Monetary Sanction 1 of 3

Monetary Sanction: Disgorgement

Total Amount: \$127,686.03

Portion against individual: 127686.03

Date Paid:

Portion Waived: No

Amount Waived:

Monetary Sanction 2 of 3

Monetary Sanction: Monetary Fine

Total Amount: \$160,000.00

Portion against individual: 160000

Date Paid:

Portion Waived: No

**Amount Waived:****Monetary Sanction 3 of 3****Monetary Sanction:** prejudgment interest on disgorgement**Total Amount:** \$14,797.44**Portion against individual:** 14797.44**Date Paid:****Portion Waived:** No**Amount Waived:****Regulator Statement**

On March 1, 2019, a final judgment was entered, by consent, against Gennity wherein he was permanently restrained and enjoined from violating, directly or indirectly, Sections 17(a) of the Securities Act of 1933 ("Securities Act"), Section 10(b) of the Exchange Act and Rule 10b-5 thereunder.

Gennity is liable for disgorgement of \$127,686.03 together with prejudgment interest thereon in the amount of \$14,797.44, and a civil penalty in the amount of \$160,000.00.

Reporting Source: Broker**Initiated By:** UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Relief Sought: Civil and Administrative Penalty(ies)/Fine(s)
 Disgorgement
 Injunction
 Monetary Penalty other than Fines

Date Court Action Filed: 09/28/2017**Product Type:** Other: unspecified securities**Type of Court:** Federal Court**Name of Court:** United States District Court for the Southern District of New York**Location of Court:** New York, NY**Docket/Case #:** 1:17-cv-07424

Employing firm when activity occurred which led to the action: Alexander Capital, L.P.

Allegations: From original U6-REGINDVL Civil Judicial Action 04/12/2018 Occurance# 1974942: The Securities and Exchange Commission, for its Complaint against



defendants William C. Gennity ("Gennity") and another individual (together, the "Defendants"), alleges that Gennity and another, as registered representatives from 2012 to 2014 at Alexander Capital, L.P. ("Alexander Capital"), a New York City broker-dealer, violated the antifraud provisions of the federal securities laws. First, the Defendants had a duty to have a reasonable basis for recommendations that they made to their customers. In violation of this duty, Gennity recommended to four customers, and the other defendant recommended to seven customers, a pattern of high cost, in-and-out trading without any reasonable basis to believe that their recommendations were suitable for anyone. These recommendations resulted in losses for the customers and ill-gotten gains for Gennity and the other defendant. Defendants knew or recklessly disregarded that their recommendations, for which they had no reasonable basis, were not suitable for anyone. The Defendant's recommendations were unsuitable for certain of their customers in light of those customers' financial needs, investment objectives and circumstances. Third, the defendants made material misrepresentations and omissions to customers. Fourth, they churned customer accounts. Finally, the defendants engaged in unauthorized trading. As a result of these violations, Gennity and the other defendant received approximately \$280,000 and \$206,000, respectively, in commissions. The eleven customers suffered losses totaling \$683,038. By virtue of the conduct alleged, the Defendants, directly or indirectly, singly or in concert, violated and are otherwise liable for violations of Section 17(a) of the Securities Act, Section 10(b) of the Exchange Act and Rule 10b-5 thereunder.

Current Status:
Limitations or Restrictions in Effect During Appeal:
Broker Statement

Pending

n/a

This information is from U6-REGINDVL Civil Judicial Action 04/12/2018 Occurrence #1974942. This update is for his U4.



Customer Dispute - Award / Judgment

This type of disclosure event involves a final, consumer-initiated, investment-related arbitration or civil suit containing allegations of sales practice violations against the broker that resulted in an arbitration award or civil judgment for the customer.

Disclosure 1 of 1

| | |
|--|--|
| Reporting Source: | Regulator |
| Employing firm when activities occurred which led to the complaint: | First Standard Financial Company, LLC |
| Allegations: | Gennity was named in a customer complaint that asserted the following causes of action: unsuitability, unauthorized trading, failure to supervise, and breach of fiduciary duty. |
| Product Type: | Other: various securities |
| Alleged Damages: | \$2,404,376.97 |

Arbitration Information

| | |
|---|---|
| Arbitration/Reparation Claim filed with and Docket/Case No.: | FINRA - CASE #18-01386 |
| Date Notice/Process Served: | 04/16/2018 |
| Arbitration Pending? | No |
| Disposition: | Award |
| Disposition Date: | 05/15/2019 |
| Disposition Detail: | Respondent William Gennity is liable for and shall pay to Claimant the sum of \$2,404,376.97 in compensatory damages plus interest. |
| Regulator Statement | This award has not been paid by or on behalf of William Gennity as of August 8, 2019. |

| | |
|--|---|
| Reporting Source: | Firm |
| Employing firm when activities occurred which led to the complaint: | FIRST STANDARD FINANCIAL |
| Allegations: | 6/2017 TO 3/2018, CLAIMING EXCESSIVE TRADING, HIGH FEES AND COMMISSIONS |
| Product Type: | Equity Listed (Common & Preferred Stock) Money Market Fund |



Alleged Damages: \$2,400,000.00

Arbitration Information

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

Docket/Case #: [18-01386](#)

Date Notice/Process Served: 04/18/2018

Arbitration Pending? No

Disposition: Award to Customer

Disposition Date: 05/15/2019

Monetary Compensation Amount: \$2,404,376.97

Individual Contribution Amount: \$2,404,376.97

Firm Statement Respondent William Gennity is liable for and shall pay to Claimant the sum of \$2,404,376.97 in compensatory damages plus interest.

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: FIRST STANDARD FINANCIAL

Allegations: 6/2017 TO 3/2018, [REDACTED] US CLAIMING EXCESSIVE TRADING, HIGH FEES AND COMMISSIONS.

Product Type: Equity Listed (Common & Preferred Stock)
Money Market Fund

Alleged Damages: \$2,400,000.00

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 #: 18-01386
Filing date of arbitration/CFTC reparation or civil litigation: 04/16/2018

Customer Complaint Information

Date Complaint Received: 04/18/2018
Complaint Pending? No
Status: Evolved into Arbitration/CFTC reparation (the individual is a named party)
Status Date: 04/18/2018

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

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

Docket/Case #: 18-01386
Date Notice/Process Served: 04/18/2018
Arbitration Pending? Yes

Broker Statement Registered Representative Comment: "I deny any wrongdoing in the customer's account. The customer's specific investment objective was to maintain an actively traded, speculation-oriented account. All transactions were authorized and directed by the customer."



Customer Dispute - Settled

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

Disclosure 1 of 3

| | |
|--|------------------------------------|
| Reporting Source: | Broker |
| Employing firm when activities occurred which led to the complaint: | First Standard Financial, LLC. |
| Allegations: | CHURNING, BREACH OF FIDUCIARY DUTY |
| Product Type: | Equity-OTC |
| Alleged Damages: | \$200,000.00 |

Arbitration Information

| | |
|---|-------------|
| Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): | FINRA |
| Docket/Case #: | 17-01783 |
| Date Notice/Process Served: | 07/10/2017 |
| Arbitration Pending? | No |
| Disposition: | Settled |
| Disposition Date: | 08/02/2018 |
| Monetary Compensation Amount: | \$75,000.00 |
| Individual Contribution Amount: | \$60,000.00 |

| | |
|-------------------------|--|
| Broker Statement | The Claimant authorized and directed all transactions executed by me in his account. Each trade was consistent with his stipulated financial condition, investment experience, aggressive risk tolerance and investment objective of speculation. This arbitration was a transparent attempt to play the market at my expense in hindsight. I begrudgingly agreed to settle it based on the onerous anticipated costs of defense associated with a week long, out of State, arbitration. |
|-------------------------|--|

Disclosure 2 of 3

| | |
|--------------------------|--------|
| Reporting Source: | Broker |
|--------------------------|--------|



Employing firm when activities occurred which led to the complaint: First Standard Financial Company

Allegations: Client spoke to compliance on 11/08/2016 regarding an allegation of unauthorized trades that occurred on 10/26/2016 and 11/01/2016. Client alleges that he informed the rep on 11/1 that he did not wish to own the additional 6000 shares of the security he already owned that was purchased on his behalf on 11/26. He further alleges that instead of cancelling the trade on 11/1, the rep sold the position against his wishes resulting in a loss. He requested that both trades be cancelled and that he not be liable for any incurred losses. Total transactional loss was approximately \$12,000.

Product Type: Equity Listed (Common & Preferred Stock)

Alleged Damages: \$12,029.52

Is this an oral complaint? Yes

Is this a written complaint? No

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

Customer Complaint Information

Date Complaint Received: 11/08/2016

Complaint Pending? No

Status: Settled

Status Date: 11/14/2016

Settlement Amount: \$12,029.52

Individual Contribution Amount: \$12,029.52

Broker Statement Claimant dropped all claims against me with prejudice. Furthermore, Claimant acknowledges that there was no wrongdoing. Furthermore, there was no findings of wrongdoing on my part related to the investments during the time period that I managed the account. The recommendations were suitable based on the Claimant's investment objectives.

Disclosure 3 of 3

Reporting Source: Broker



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

Allegations: CHURNED & UNSUITABLE CONCENTRATED POSITION

Product Type: Equity-OTC

Alleged Damages: \$28,627.46

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: 08/27/2014

Complaint Pending? No

Status: Settled

Status Date: 09/24/2014

Settlement Amount: \$14,900.00

Individual Contribution Amount: \$10,199.71

Broker Statement THE ALLEGATIONS ARE WHOLLY AND FULLY ERRONEOUS AND SLANDEROUS. I HAVE CONTACTED LEGAL COUNSEL AND WILL FIGHT THIS DEFAMATORY, MALICIOUS ALLEGATION WITH FULL VIM AND VIGOR.



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

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

Disclosure 1 of 2

| | |
|--|---|
| Reporting Source: | Firm |
| Employing firm when activities occurred which led to the complaint: | Alexander Capital LP |
| Allegations: | Unsuitable and excessive trading and excessive commissions |
| Product Type: | Equity-OTC |
| Alleged Damages: | \$660,000.00 |
| Alleged Damages Amount Explanation (if amount not exact): | amount of damages claimed by customer: \$300,000 in commissions and \$360,000 in losses |
| 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: | 02/08/2016 |
| Complaint Pending? | No |
| Status: | Closed/No Action |
| Status Date: | 04/30/2016 |
| Settlement Amount: | |
| Individual Contribution Amount: | |

Reporting Source: Broker



| | |
|--|--|
| Employing firm when activities occurred which led to the complaint: | Alexander Capital, LP |
| Allegations: | Customer alleges unsuitability as well as excessive trading and commissions. |
| Product Type: | Equity-OTC |
| Alleged Damages: | \$660,000.00 |
| 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: | 04/18/2016 |
| Complaint Pending? | No |
| Status: | Closed/No Action |
| Status Date: | 04/30/2016 |
| Settlement Amount: | |
| Individual Contribution Amount: | |

Disclosure 2 of 2

| | |
|--|--|
| Reporting Source: | Firm |
| Employing firm when activities occurred which led to the complaint: | Alexander Capital LP |
| Allegations: | unsuitable recommendations, misrepresentation, misstatements, material omissions |
| Product Type: | Equity-OTC Equity Listed (Common & Preferred Stock) |
| Alleged Damages: | \$5,000.00 |
| Alleged Damages Amount Explanation (if amount not exact): | No monetary damages stated |



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: 03/17/2016
Complaint Pending? No
Status: Withdrawn
Status Date: 07/13/2017
Settlement Amount: \$0.00
**Individual Contribution
Amount:** \$0.00
Firm Statement THE CUSTOMER WITHDREW ALL CLAIMS

Reporting Source: Broker
**Employing firm when
activities occurred which led
to the complaint:** Alexander Capital, LP
Allegations: Customer alleges unsuitability and misrepresentation.
Product Type: Equity-OTC
Equity Listed (Common & Preferred Stock)
Alleged Damages: \$5,000.00
**Alleged Damages Amount
Explanation (if amount not
exact):** No dollar amount was specified in the customer complaint.

Is this an oral complaint? No
Is this a written complaint? Yes
**Is this an arbitration/CFTC
reparation or civil litigation?** No

Customer Complaint Information

Date Complaint Received: 04/18/2016



| | |
|--|------------|
| Complaint Pending? | No |
| Status: | Withdrawn |
| Status Date: | 08/23/2017 |
| Settlement Amount: | |
| Individual Contribution Amount: | |



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 2

| | |
|--|--|
| Reporting Source: | Firm |
| Employing firm when activities occurred which led to the complaint: | FIRST STANDARD FINANCIAL |
| Allegations: | UNSUITABLE TRADES, UNAUTHORIZED TRADING & EXCESSIVE TRADING. |
| Product Type: | Equity Listed (Common & Preferred Stock) |
| Alleged Damages: | \$380,000.00 |

Arbitration Information

| | |
|---|------------|
| Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): | FINRA |
| Docket/Case #: | 19-00416 |
| Date Notice/Process Served: | 02/15/2019 |
| Arbitration Pending? | Yes |

Disclosure 2 of 2

| | |
|--|--|
| Reporting Source: | Firm |
| Employing firm when activities occurred which led to the complaint: | First Standard Financial Company, LLC |
| Allegations: | Churning and unsuitable trades |
| Product Type: | Equity Listed (Common & Preferred Stock) |
| Alleged Damages: | \$90,198.00 |

Arbitration Information



| | |
|---|------------|
| Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): | FINRA |
| Docket/Case #: | 18-04014 |
| Date Notice/Process Served: | 12/03/2018 |
| Arbitration Pending? | Yes |

End of Report



This page is intentionally left blank.