

## BrokerCheck Report

**MICHAEL JOHN GIOVANNELLI**

CRD# 4989449

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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:
  - 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
  - information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

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

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

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

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

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

**Thank you for using FINRA BrokerCheck.**



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at [brokercheck.finra.org](http://brokercheck.finra.org)



For additional information about the contents of this report, please refer to the User Guidance or [www.finra.org/brokercheck](http://www.finra.org/brokercheck). It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit [www.finra.org](http://www.finra.org).



**MICHAEL J. GIOVANNELLI**  
CRD# 4989449

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** **SPARTAN CAPITAL SECURITIES, LLC**  
CRD# 146251  
GARDEN CITY, NY  
07/2019 - 08/2020
- B** **RICHARD JAMES & ASSOCIATES, INC.**  
CRD# 169131  
Syosett, NY  
05/2017 - 04/2019
- B** **SALOMON WHITNEY FINANCIAL**  
CRD# 145012  
Melville, NY  
08/2015 - 05/2017

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	1
Criminal	2
Customer Dispute	4
Termination	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
<div>B</div> Securities Industry Essentials Examination	SIE	10/01/2018
<div>B</div> General Securities Representative Examination	Series 7	02/09/2006

State Securities Law Exams

Exam	Category	Date
<div>B</div> Uniform Securities Agent State Law Examination	Series 63	04/30/2006

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/](http://www.finra.org/brokerqualifications/registeredrep/).

## Broker Qualifications



## Professional Designations

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

No information reported.



## Registration and Employment History

### Registration History

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
<b>B</b> 07/2019 - 08/2020	SPARTAN CAPITAL SECURITIES, LLC	146251	GARDEN CITY, NY
<b>B</b> 05/2017 - 04/2019	RICHARD JAMES & ASSOCIATES, INC.	169131	Syosett, NY
<b>B</b> 08/2015 - 05/2017	SALOMON WHITNEY FINANCIAL	145012	Melville, NY
<b>B</b> 04/2015 - 08/2015	LEGEND SECURITIES, INC.	44952	Melville, NY
<b>B</b> 01/2014 - 03/2015	BROOKVILLE CAPITAL PARTNERS	102380	Melville, NY
<b>B</b> 04/2013 - 01/2014	NATIONAL SECURITIES CORPORATION	7569	MELVILLE, NY
<b>B</b> 01/2011 - 04/2013	WOODSTOCK FINANCIAL GROUP, INC.	38095	WOODSTOCK, GA
<b>B</b> 04/2009 - 01/2011	BROOKSTONE SECURITIES, INC.	13366	MASSAPEQUA, NY
<b>B</b> 12/2008 - 04/2009	J.P. TURNER & COMPANY, L.L.C.	43177	SYOSSET, NY
<b>B</b> 10/2008 - 12/2008	NATIONAL SECURITIES CORPORATION	7569	HUNTINGTON, NY
<b>B</b> 08/2007 - 08/2008	FIRST MIDWEST SECURITIES, INC.	21786	BLOOMINGTON, IL
<b>B</b> 03/2007 - 08/2007	NATIONAL SECURITIES CORPORATION	7569	HUNTINGTON, NY
<b>B</b> 11/2006 - 03/2007	MAX INTERNATIONAL BROKER/DEALER CORP.	46039	NEW YORK, NY
<b>B</b> 02/2006 - 12/2006	WORLD EQUITY GROUP, INC.	29087	GARDEN CITY, 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
06/2019 - Present	Spartan Capital Securities, LLC	Registered Representative	Y	New York, NY, United States



# Registration and Employment History

## Employment History, continued

Employment	Employer Name	Position	Investment Related	Employer Location
05/2017 - 04/2019	Richard James and Associates, Inc	Broker	Y	Hicksville, NY, United States
08/2015 - 05/2017	SALOMON WHITNEY FINANCIAL	REGISTERED REPRESENTATIVE	Y	FARMINGDALE, NY, United States
04/2015 - 08/2015	LEGEND SECURITIES, INC.	REGISTERED REPRESENTATIVE	Y	MELVILLE, NY, United States
01/2014 - 03/2015	BROOKVILLE CAPITAL PARTNERS	BROKER	Y	UNIONDALE, 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:**
  - 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.
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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.
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4. **There are different statuses and dispositions for disclosure events:**
  - 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.
  - 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	1	0
Criminal	0	2	0
Customer Dispute	1	3	N/A
Termination	N/A	1	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 1

Reporting Source:	Regulator
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	Other: N/A
Date Initiated:	06/17/2021
Docket/Case Number:	<a href="#">2019061941101</a>
Employing firm when activity occurred which led to the regulatory action:	Spartan Capital Securities, LLC; Richard James & Associates Inc.
Product Type:	Equity Listed (Common & Preferred Stock) Other: Unspecified Securities
Allegations:	Giovannelli was named a respondent in a FINRA complaint alleging he made unauthorized transactions in the account of a senior customer. The complaint alleges that the unauthorized trades generated trading costs of approximately \$2,281, including \$1,380 in commissions, and caused \$1,494 in realized losses. The complaint also alleges that Giovannelli attempted to conceal his unauthorized trading in the senior customer's account from FINRA. As part of its investigation into Giovannelli's unauthorized transactions, FINRA requested that Giovannelli produce copies of his telephone records for a time period that included the unauthorized transactions. In response, Giovannelli provided altered phone records to FINRA. Specifically, Giovannelli altered the entries for five calls to give



the false impression that he spoke with, and received authorization from, the senior customer before making the unauthorized trades. The complaint further alleges that Giovannelli testified falsely at his on-the-record interview (OTR). He falsely denied altering any of the records that he produced to FINRA and falsely claimed he spoke with, and received authorization from, the senior customer before every trade. In addition, the complaint alleges that separately, Giovannelli made trades in other customer accounts without obtaining the customers' prior authorization for the trades. Giovannelli did not have written authorization to make discretionary trades in the customers' accounts from either the customers or the member firm.

<b>Current Status:</b>	Final
<b>Resolution:</b>	Decision
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	12/17/2021
<b>Sanctions Ordered:</b>	Bar (Permanent) Restitution Other: plus interest
<b>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?</b>	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:** Bar (Permanent)

**Capacities Affected:** all capacities

**Duration:** Indefinite

**Start Date:** 12/17/2021

**End Date:**

#### **Monetary Sanction 1 of 1**

**Monetary Related Sanction:** Restitution

**Total Amount:** \$1,494.00

**Portion Levied against individual:** \$1,494.00

**Payment Plan:** plus interest

**Is Payment Plan Current:**

**Date Paid by individual:**

**Was any portion of penalty waived?** No

#### **Amount Waived:**

**Regulator Statement** Default decision rendered November 19, 2021, wherein Giovannelli is barred from



association with any FINRA member in all capacities and ordered to pay \$1,494, plus interest, in restitution to a customer. In light of the bars, no further sanctions are imposed for Giovannelli's discretionary trading without written authorization. The sanctions were based on the findings that Giovannelli made trades in an elderly customer's non-discretionary account without the customer's authorization. The findings stated that the unauthorized trades generated \$1,380 in commissions and \$1,494 in realized losses. The findings also stated that Giovannelli provided false documents to FINRA in connection with its investigation into his unauthorized transactions. Giovannelli provided copies of altered cellphone records to FINRA to make it appear that he spoke to the customer on five of the six dates of the unauthorized trades when he did not. The findings also included that Giovannelli provided false testimony during his on-the-record interview. Giovannelli testified that he contacted the customer to obtain authorization prior to each of the unauthorized trades he made in the customer's account. In fact, Giovannelli did not speak to the customer or obtain his authorization before any of the trades. Giovannelli also testified that he did not alter any of the telephone records that he provided to FINRA. FINRA found that Giovannelli exercised discretion by trading in customers' accounts without their written authorization and his member firm did not accept any of the accounts as discretionary. The decision is final on December 17, 2021.



## Criminal - Final Disposition

This type of disclosure event involves a criminal charge against the broker that has resulted in a conviction, acquittal, dismissal, or plea. The criminal matter may pertain to any felony or certain misdemeanor offenses, including bribery, perjury, forgery, counterfeiting, extortion, fraud, and wrongful taking of property.

### Disclosure 1 of 2

<b>Reporting Source:</b>	Broker
<b>Formal Charges were brought in:</b>	State Court
<b>Name of Court:</b>	DISTRICT COURT OF NASSAU COUNTY - HEMPSTEAD
<b>Location of Court:</b>	HEPSTEAD, NEW YORK
<b>Docket/Case #:</b>	2010NA01748
<b>Charge Date:</b>	07/05/2010
<b>Charge(s) 1 of 1</b>	
<b>Formal Charge(s)/Description:</b>	MAKING A PUNISHABLE FALSE WRITTEN STATEMENT
<b>No of Counts:</b>	1
<b>Felony or Misdemeanor:</b>	Misdemeanor
<b>Plea for each charge:</b>	NOT GUILTY
<b>Disposition of charge:</b>	Dismissed
<b>Current Status:</b>	Final
<b>Status Date:</b>	06/22/2011
<b>Disposition Date:</b>	06/22/2011
<b>Sentence/Penalty:</b>	DISMISSED

### Disclosure 2 of 2

<b>Reporting Source:</b>	Broker
<b>Formal Charges were brought in:</b>	State Court
<b>Name of Court:</b>	COUNTY COURT OF THE STATE OF NEW YORK, NASSAU COUNTY
<b>Location of Court:</b>	MINEOLA, NEW YORK



Docket/Case #:	SCI-01148N-2009
Charge Date:	01/09/2009
Charge(s) 1 of 1	
Formal Charge(s)/Description:	CHARGED WITH FELONY POSSESSION OF CONTROLLED SUBSTANCE
No of Counts:	1
Felony or Misdemeanor:	Felony
Plea for each charge:	NOT GUILTY
Disposition of charge:	Reduced
Date of Amended Charge:	05/26/2010
Charge was Amended or reduced to:	MISDEMEANOR POSSESSION OF CONTROLLED SUBSTANCE
Amended No of Counts:	1
Amended Charge:	Misdemeanor
Amended Plea:	GUILTY
Disposition of Amended Charge:	Pled guilty
Current Status:	Final
Status Date:	10/05/2010
Disposition Date:	10/05/2010
Sentence/Penalty:	PROBATION - 3 YEARS, FINES TOTALING \$200.00





## 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

<b>Reporting Source:</b>	Regulator
<b>Employing firm when activities occurred which led to the complaint:</b>	SW Financial
<b>Allegations:</b>	Giovannelli was named in a customer complaint that asserted the following causes of action: unsuitability; over-concentration; churning; excessive trading; commission abuse; failure to supervise; breach of fiduciary duty; negligence; fraudulent misrepresentation; breach of contract; respondeat superior; lost opportunity damages; and violation of the California Elder Abuse and Dependent Adult Civil Protection Act. The causes of action relate to investments in Square, Inc. and Barclays IPATH S&P500 VIX Short Term ETN.
<b>Product Type:</b>	Equity Listed (Common & Preferred Stock) Other: ETN
<b>Alleged Damages:</b>	\$97,292.27

### Arbitration Information

**Arbitration/Reparation Claim filed with and Docket/Case No.:** [FINRA - CASE #20-00470](#)

<b>Date Notice/Process Served:</b>	01/31/2020
<b>Arbitration Pending?</b>	No
<b>Disposition:</b>	Award
<b>Disposition Date:</b>	08/27/2020
<b>Disposition Detail:</b>	Respondent Giovannelli is jointly and severally liable for and shall pay to Claimant \$97,292.27 in compensatory damages and is jointly and severally liable for and shall pay to Claimant interest on the aforementioned sum at the rate of 10% per annum from February 11, 2020 until the award is paid in full. Giovannelli is jointly and severally liable for and shall pay to Claimant the sum of \$12,500.00 in punitive damages pursuant to CA Civil Code section 3294 and the CA Elder Abuse and Dependent Adult Civil Protection Act. Giovannelli is jointly and severally liable for and shall pay to Claimant the sum of \$11,500.00 in attorneys' fees pursuant to the CA Elder Abuse and Dependent Adult Civil Protection Act.



<b>Reporting Source:</b>	Firm
<b>Employing firm when activities occurred which led to the complaint:</b>	SW FINANCIAL
<b>Allegations:</b>	Churning, Excessive Commissions, Unsuitable Trading, Over-concentration, Fraud, Negligence
<b>Product Type:</b>	Equity Listed (Common & Preferred Stock)
<b>Alleged Damages:</b>	\$97,292.27
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	asking for punitive damages also

### Arbitration Information

<b>Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):</b>	FINRA
<b>Docket/Case #:</b>	<a href="#">20-00470</a>
<b>Date Notice/Process Served:</b>	04/02/2020
<b>Arbitration Pending?</b>	No
<b>Disposition:</b>	Award to Customer
<b>Disposition Date:</b>	01/11/2021
<b>Monetary Compensation Amount:</b>	\$97,292.27
<b>Individual Contribution Amount:</b>	\$97,292.27
<b>Firm Statement</b>	Previous DRP filed in error. Giovannelli case still pending

<b>Reporting Source:</b>	Broker
<b>Employing firm when activities occurred which led to the complaint:</b>	SW Financial
<b>Allegations:</b>	Alleged allegations of Churning, Unsuitable investments, Over concentration, Excessive commissions
<b>Product Type:</b>	Equity Listed (Common & Preferred Stock)



**Alleged Damages:** \$97,292.27

**Arbitration Information**

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

**Docket/Case #:** 20-00470

**Date Notice/Process Served:** 04/14/2020

**Arbitration 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 1

<b>Reporting Source:</b>	Firm
<b>Employing firm when activities occurred which led to the complaint:</b>	Salomon Whitney Financial
<b>Allegations:</b>	Client Alleges unauthorized trading and churning
<b>Product Type:</b>	Equity Listed (Common & Preferred Stock)
<b>Alleged Damages:</b>	\$15,000.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	Client alleges unrealized gains of between \$15,000 and \$25,000
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	Yes
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	No

### Customer Complaint Information

<b>Date Complaint Received:</b>	01/09/2017
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	10/02/2017
<b>Settlement Amount:</b>	\$5,000.00
<b>Individual Contribution Amount:</b>	\$0.00
<b>Firm Statement</b>	Client allegations were proven false. Phone records confirmed that the client was in contact with the broker for every transaction. After further discussions with the client, it was determined that he had second thoughts about approving the sale of securities that were already a profit to him. Claim was mutually settled for \$5,000.00 to avoid any further litigation costs



<b>Reporting Source:</b>	Broker
<b>Employing firm when activities occurred which led to the complaint:</b>	SW Financial
<b>Allegations:</b>	Unauthorized trading and churning
<b>Product Type:</b>	Equity Listed (Common & Preferred Stock)
<b>Alleged Damages:</b>	\$15,000.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	Client alleges unrealized gains of between 15 and twenty five thousand dollars
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	Yes
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	No

### Customer Complaint Information

<b>Date Complaint Received:</b>	11/06/2017
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	11/02/2017
<b>Settlement Amount:</b>	\$5,000.00
<b>Individual Contribution Amount:</b>	\$0.00

<b>Broker Statement</b>	I spoke with the client on every trade; and received authorization for all transactions. I never UT a client in my entire career as a registered representative. Client is mistaken. In fact the client's account was up more then \$ 35,000.00. He became upset because after advising me to sell, the stocks went up further. After first receiving a notice that the matter was denied I now have received a notice that the firm settled with the cust. for 5000. I made no contribution to this matter.
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## 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 1

<b>Reporting Source:</b>	Firm
<b>Employing firm when activities occurred which led to the complaint:</b>	WOODSTOCK FINANCIAL GROUP
<b>Allegations:</b>	MISREPRESENTATION, MISLED CLIENT TO BELIEVE STOCK WAS STRAIGHT PURCHASE INSTEAD OF ON MARGIN, IMPLIED OR GUARANTEED A RETURN ON INVESTMENT.
<b>Product Type:</b>	Equity-OTC
<b>Alleged Damages:</b>	\$55,000.00
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	Yes
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	No

### Customer Complaint Information

<b>Date Complaint Received:</b>	07/06/2015
<b>Complaint Pending?</b>	No
<b>Status:</b>	Denied
<b>Status Date:</b>	05/22/2017
<b>Settlement Amount:</b>	
<b>Individual Contribution Amount:</b>	
<b>Firm Statement</b>	WHILE CLIENT STATES HE SENT IN \$55,000 HE ACTUALLY DEPOSITED \$51,782.45 AND WITHDREW \$3,650 FOR A NET OF \$48132.45

<b>Reporting Source:</b>	Broker
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<b>Employing firm when activities occurred which led to the complaint:</b>	WOODSTOCK FINANCIAL GROUP
<b>Allegations:</b>	MISREPRESENTATION, MISLEAD CLIENT TO BELIEVE STOCK WAS STRAIGHT PURCHASE INSTEAD OF ON MARGIN, IMPLIED OR GUARANTEED RETURN OF INVESTMENT
<b>Product Type:</b>	Equity-OTC
<b>Alleged Damages:</b>	\$55,000.00
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	Yes
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	No
<b>Customer Complaint Information</b>	
<b>Date Complaint Received:</b>	07/06/2015
<b>Complaint Pending?</b>	No
<b>Status:</b>	Denied
<b>Status Date:</b>	05/22/2017
<b>Settlement Amount:</b>	
<b>Individual Contribution Amount:</b>	
<b>Broker Statement</b>	WHILE CLIENT STATES HE SENT IN \$55,000.00, HE ACTUALLY DEPOSITED \$51,782.45 AND WITHDREW \$3,650.00 FOR A NEW OF \$48,132.45



## 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

<b>Reporting Source:</b>	Regulator
<b>Employing firm when activities occurred which led to the complaint:</b>	Richard James & Associates, Inc.
<b>Allegations:</b>	Giovanelli was named in a customer complaint that asserted the following causes of action: churning for commissions and quantitative unsuitability (Fraud) Rules 2111 and Section 17(a) of the Securities Act of 1933, Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5; unauthorized transactions (Rule 2010); qualitative and quantitative unsuitability (Rule 2111); failure to supervise and negligent supervision (Rule 3010); control person liability; breach of fiduciary contract and implied covenant of good faith and fair dealing; negligent misrepresentation and omissions; standards of commercial honor and principles of trade (Rule 2010).
<b>Product Type:</b>	Equity Listed (Common & Preferred Stock)
<b>Alleged Damages:</b>	\$20,609.34
<b>Arbitration Information</b>	
<b>Arbitration/Reparation Claim filed with and Docket/Case No.:</b>	FINRA - CASE #22-00884
<b>Date Notice/Process Served:</b>	04/22/2022
<b>Arbitration Pending?</b>	Yes





## 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

<b>Reporting Source:</b>	Firm
<b>Employer Name:</b>	Spartan Capital Securities, LLC
<b>Termination Type:</b>	Discharged
<b>Termination Date:</b>	07/31/2020
<b>Allegations:</b>	Unauthorized trading
<b>Product Type:</b>	Equity-OTC
<b>Firm Statement</b>	The Firm received a Complaint from a client of Mr. Giovanelli alleging unauthorized trading. The Firm obtained, reviewed and analyzed all available records. There was sufficient evidence that supported the allegations of unauthorized trading in the Client Account by Mr. Giovannelli including but not limited to the lack of phone records to support the trades in the account.

## End of Report



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