

BrokerCheck Report

DENNIS ALBERT MEHRINGER JR

CRD# 722569

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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:

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

- **How current is this information?**

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

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

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

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

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

Thank you for using FINRA BrokerCheck.



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

brokercheck.finra.org



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

DENNIS A. MEHRINGER JR

CRD# 722569

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:

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

Registration History

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

- B WESTERN INTERNATIONAL SECURITIES, INC.**
CRD# 39262
Pasadena, CA
03/2009 - 05/2018
- B FIRST ALLIED SECURITIES, INC.**
CRD# 32444
PASADENA, CA
05/2004 - 03/2009
- B FSC SECURITIES CORPORATION**
CRD# 7461
ATLANTA, GA
08/2001 - 06/2004

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	12
Judgment/Lien	1

Investment Adviser Representative Information

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

<https://www.adviserinfo.sec.gov>

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 2 principal/supervisory exams, 4 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
B Municipal Fund Securities Principal Examination	Series 51	03/29/2003
B General Securities Principal Examination	Series 24	05/23/2000

General Industry/Product Exams

Exam	Category	Date
B Securities Industry Essentials Examination	SIE	05/07/2018
B General Securities Representative Examination	Series 7	07/08/1998
B Direct Participation Programs Representative Examination	Series 22	06/10/1992
B Investment Company Products/Variable Contracts Representative Examination	Series 6	01/23/1981

State Securities Law Exams

Exam	Category	Date
B IA Uniform Combined State Law Examination	Series 66	08/24/2015
B Uniform Securities Agent State Law Examination	Series 63	09/07/1990

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 **1** professional designation(s).

Chartered Financial Consultant

This representative holds or did hold **1** professional designation(s) that may have been used to qualify as an Investment Advisor representative. Please check with the appropriate designation authority for verification that the designation is still in effect. The contact information for these professional designation authorities can be found on the website for the North American Securities Administrators Association at <http://www.nasaa.org>



Registration and Employment History

Registration History

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
B 03/2009 - 05/2018	WESTERN INTERNATIONAL SECURITIES, INC.	39262	Pasadena, CA
B 05/2004 - 03/2009	FIRST ALLIED SECURITIES, INC.	32444	PASADENA, CA
B 08/2001 - 06/2004	FSC SECURITIES CORPORATION	7461	ATLANTA, GA
B 10/1995 - 09/2001	WALNUT STREET SECURITIES, INC.	15840	EL SEGUNDO, CA
B 06/1990 - 02/1996	EQUICO SECURITIES, INC.	6627	NEW YORK, NY
B 06/1990 - 02/1996	THE EQUITABLE LIFE ASSURANCE SOCIETY OF THE UNITED STATES	4039	NEW YORK, NY
B 06/1994 - 10/1994	UNITED PACIFIC SECURITIES, INC.	21986	CARLSBAD, CA
B 10/1992 - 01/1994	NEW ENGLAND SECURITIES	615	NEW YORK, NY
B 03/1991 - 02/1992	U.S. SECURITIES CLEARING CORP.	15403	SAN DIEGO, CA
B 06/1987 - 03/1989	GUARDIAN INVESTOR SERVICES CORPORATION	6635	
B 09/1984 - 05/1987	PML SECURITIES COMPANY	4082	
B 02/1981 - 10/1984	NEL EQUITY SERVICES CORPORATION	615	

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
03/2009 - 05/2018	WESTERN INTERNATIONAL SECURITIES, INC.	REGISTERED REPRESENTATIVE	Y	PASADENA, CA, United States



Registration and Employment History

Other Business Activities

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

- 1) VELA & MEHRINGER, INC. DBA VMKS; NON-INVESTMENT RELATED; 600 S. LAKE AVE., STE. 310, PASADENA, CA 91106; THIRD PARTY ADMINISTRATOR FOR QUALIFIED PENSION & EMPLOYEE BENEFIT PLANS; PRINCIPAL; 08/16/1990; PART-TIME
 - 2) NEUTRA INSTITUTE FOR SURVIVAL THROUGH DESIGN; NON-INVESTMENT RELATED; 2440 NEUTRA PL., LOS ANGELES, CA 90039; SCHOLARSHIPS; 01/01/2011; 1HR/MO
 - 3) MDT, LLC; NON-INVESTMENT RELATED; CREATED TO SHARE LEASE EXPENSES; 600 S. LAKE AVE., STE. 310 PASADENA, CA 91106; 12/2016
-



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	1	11	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:	
Date Initiated:	10/18/2019
Docket/Case Number:	2019061994701
Employing firm when activity occurred which led to the regulatory action:	Western International Securities, Inc.
Product Type:	Other: unspecified securities
Allegations:	Without admitting or denying the findings, Mehringer consented to the sanction and to the entry of findings that he refused to appear for on-the-record testimony requested by FINRA during the course of an examination involving possible unsuitable trading and other misconduct.
Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)



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

No

Resolution Date:

10/18/2019

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 1

Sanction Type:	Bar (Permanent)
Capacities Affected:	All Capacities
Duration:	Indefinite
Start Date:	10/18/2019
End Date:	



Disclosure 2 of 2

Reporting Source: Regulator

Regulatory Action Initiated By: FINRA

Sanction(s) Sought: Other: n/a

Date Initiated: 12/16/2016

Docket/Case Number: [2014041868001](#)

Employing firm when activity occurred which led to the regulatory action: Western International Securities, Inc.

Product Type: Mutual Fund

Allegations: Mehringer was named a respondent in a FINRA complaint alleging that he made unsuitable recommendations that caused a customer to engage in excessively expensive short-term trading and intra-day switching of mutual fund Class A shares. The complaint alleges that Mehringer repeatedly recommended, and caused the customer to engage in, short-term purchases and sales of 84 mutual fund Class A positions (involving the sale of shares within a year of purchasing them) in five of the customer's accounts. In 47 of the 84 purchase transactions, the customer paid front-end sales loads ranging from four to five percent. All but 17 of these 84 mutual fund positions were held for less than six months, and approximately 35 of them were held for less than three months. Five were held for less than one week. Mehringer received \$169,735 in commissions from the transactions. Mehringer recommended the short-term mutual fund trading and the intra-day mutual fund switching alleged above without reasonable grounds to believe that the recommendations were suitable for the customer in light of the frequency and nature of the transactions, including the associated sales loads, based on the customer's investment objectives. Given the long-term nature of Class A mutual fund share investments, along with the sales loads incurred in connection with frequent trading and switching between the relevant mutual funds and mutual fund families, Mehringer's short-term trading and switching was also unsuitable for any customer. The complaint also alleges that Mehringer exercised discretion in the same customer's accounts without obtaining the customer's written authorization and his member firm's approval to do so. The complaint further alleges that Mehringer failed to fulfill his fiduciary obligations to a charitable trust he had helped create when, as trustee, he violated the purported charitable purposes of the trust. Mehringer also endangered the favorable tax treatment for donations to the trust, temporarily held trust assets in his own name, and made a risky investment of trust assets without conducting due diligence or taking



reasonable steps to protect those assets, and without putting the invested funds into escrow or documenting the investment. Generally, Mehringer breached his fiduciary obligation to the trust by establishing it in such a manner as to give himself potential ownership of the trust's assets and by failing to ensure that it would fulfill its purported charitable purposes of funding scholarships and educational expenses for underprivileged children at private schools. In addition, the complaint alleges that Mehringer provided false information to his firm when questioned about the use of assets from the trust. Moreover, the complaint alleges that Mehringer settled a customer complaint without providing notice to his firm. Particularly, Mehringer did not disclose either the complaint or the settlement to his firm's compliance department or to his supervisor. Furthermore, the complaint alleges that Mehringer submitted false responses to his firm in an annual compliance questionnaire about the complaint and settlement.

Current Status:	Final
Action Appealed To:	SRO
Date Appeal filed:	05/23/2018
Appeal Limitation Details:	
Resolution:	Decision
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:	07/20/2020
Sanctions Ordered:	Bar (Permanent) Disgorgement Monetary Penalty other than Fines Other: prejudgment interest on disgorgement
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: Bar (Permanent)
Capacities Affected: All capacities
Duration: Indefinite
Start Date: 06/15/2020
End Date:

Monetary Sanction 1 of 2

Monetary Related Sanction: Monetary Penalty other than Fines
Total Amount: \$8,218.90
Portion Levied against individual: \$8,218.90
Payment Plan: costs
Is Payment Plan Current:
Date Paid by individual:
Was any portion of penalty waived? No

Amount Waived:

Monetary Sanction 2 of 2



Monetary Related Sanction: Disgorgement
Total Amount: \$108,131.21
Portion Levied against individual: \$108,131.21
Payment Plan: plus prejudgment interest

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Regulator Statement

Extended Hearing Panel decision rendered April 30, 2018. The sanctions were based on findings that Mehringer made unsuitable recommendations that resulted in excessive trading in mutual fund Class A shares in a customer's accounts. The findings stated that Mehringer solicited all of the purchase and sale transactions in Class A shares. Mehringer engaged in a pattern of buying and selling that involved many transactions in Class A shares. There were so many transactions in Class A shares that it would have been impossible for the customer to keep track of them. Mehringer held the shares for short periods of time before selling them. That he frequently broke up the buy and sell transactions constitutes a pattern demonstrating that his true objective was to maximize commissions. The findings also stated that Mehringer exercised discretion without authority by executing unauthorized trades in Class A shares in the customer's accounts. Mehringer evaded supervision by failing to obtain written permission from the customer and his member firm to exercise discretion before making trades in the accounts. The findings also included that Mehringer breached his fiduciary obligations by failing to organize and operate a charitable trust as a tax-exempt charity, and ensure that its funds were used for tax-exempt purposes and not primarily to benefit a client's family. Because the entity was not in fact a charitable trust, the Hearing Panel declined to find violations as to the additional allegations that Mehringer breached his fiduciary obligations to the trust by commingling trust money with his own money when he invested in the a property and investing trust funds recklessly in a nursing home. FINRA found that Mehringer made false and misleading statements to his firm about his use of trust funds, failed to disclose a customer complaint and his settlement with the customer, and falsely told his firm he had not settled a customer complaint. On May 23, 2018, Mehringer appealed the decision to the National Adjudicatory Council (NAC).

NAC decision rendered June 15, 2020 wherein the findings made are modified and the sanctions imposed by the Hearing Panel are affirmed in relevant part. The NAC dismissed the third cause of action related to Mehringer's breach of his



fiduciary obligations to the trust.

The decision is final as of July 20, 2020.

Reporting Source: Broker

Regulatory Action Initiated By: FINRA

Sanction(s) Sought:

Date Initiated: 12/16/2016

Docket/Case Number: [2014041868001](#)

Employing firm when activity occurred which led to the regulatory action: Western International Securities, Inc.

Product Type: Mutual Fund

Allegations: Mehringer was named a respondent in a FINRA complaint alleging that he made unsuitable recommendations that caused a customer to engage in excessively expensive short-term trading and intra-day switching of mutual fund Class A shares. The complaint alleges that Mehringer repeatedly recommended, and caused the customer to engage in, short-term purchases and sales of 84 mutual fund Class A positions (involving the sale of shares within a year of purchasing them) in five of the customer's accounts. In 47 of the 84 purchase transactions, the customer paid front-end sales loads ranging from four to five percent. All but 17 of these 84 mutual fund positions were held for less than six months, and approximately 35 of them were held for less than three months. Five were held for less than one week. Mehringer received \$169,735 in commissions from the transactions. Mehringer recommended the short-term mutual fund trading and the intra-day mutual fund switching alleged above without reasonable grounds to believe that the recommendations were suitable for the customer in light of the frequency and nature of the transactions, including the associated sales loads, based on the customer's investment objectives. Given the long-term nature of Class A mutual fund share investments, along with the sales loads incurred in connection with frequent trading and switching between the relevant mutual funds and mutual fund families, Mehringer's short-term trading and switching was also unsuitable for any customer. The complaint also alleges that Mehringer exercised discretion in the same customer's accounts without obtaining the customer's written authorization and his member firm's approval to do so. The complaint further alleges that Mehringer failed to fulfill his fiduciary obligations to a charitable trust he had helped create when, as trustee, he violated the purported charitable purposes of the trust. Mehringer also endangered the favorable tax treatment for



donations to the trust, temporarily held trust assets in his own name, and made a risky investment of trust assets without conducting due diligence or taking reasonable steps to protect those assets, and without putting the invested funds into escrow or documenting the investment. Generally, Mehringer breached his fiduciary obligation to the trust by establishing it in such a manner as to give himself potential ownership of the trust's assets and by failing to ensure that it would fulfill its purported charitable purposes of funding scholarships and educational expenses for underprivileged children at private schools. In addition, the complaint alleges that Mehringer provided false information to his firm when questioned about the use of assets from the trust. Moreover, the complaint alleges that Mehringer settled a customer complaint without providing notice to his firm. Particularly, Mehringer did not disclose either the complaint or the settlement to his firm's compliance department or to his supervisor. Furthermore, the complaint alleges that Mehringer submitted false responses to his firm in an annual compliance questionnaire about the complaint and settlement.

Current Status:

Pending

Broker Statement

Extended Hearing Panel decision rendered April 30, 2018 wherein Mehringer was fined \$50,000, barred from association with any FINRA member in all capacities, ordered to disgorge \$108,131.21, plus prejudgment interest, and ordered to pay costs of \$6,568.43. In light of the bar, the Panel did not impose additional sanctions. The sanctions were based on findings that Mehringer made unsuitable recommendations that resulted in excessive trading in mutual fund Class A shares in a customer's accounts. The findings stated that Mehringer solicited all of the purchase and sale transactions in Class A shares. Mehringer engaged in a pattern of buying and selling that involved many transactions in Class A shares. There were so many transactions in Class A shares that it would have been impossible for the customer to keep track of them. Mehringer held the shares for short periods of time before selling them. That he frequently broke up the buy and sell transactions constitutes a pattern demonstrating that his true objective was to maximize commissions. The findings also stated that Mehringer exercised discretion without authority by executing unauthorized trades in Class A shares in the customer's accounts. Mehringer evaded supervision by failing to obtain written permission from the customer and his member firm to exercise discretion before making trades in the accounts. The findings also included that Mehringer breached his fiduciary obligations by failing to organize and operate a charitable trust as a tax-exempt charity, and ensure that its funds were used for tax-exempt purposes and not primarily to benefit a client's family. Because the entity was not in fact a charitable trust, the Hearing Panel declined to find violations as to the additional allegations that Mehringer breached his fiduciary obligations to the trust by commingling trust money with his own money when he invested in the a property and investing trust funds recklessly in a nursing home. FINRA found that Mehringer made false and misleading statements to his firm about his use of trust funds, failed to disclose a customer complaint and his settlement with the customer, and falsely told his firm he had not settled a customer complaint. If no



further action is taken, the decision will become final on June 18, 2018.



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:	Broker
Employing firm when activities occurred which led to the complaint:	FIRST ALLIED SECURITIES
Allegations:	IN 2005 THE FC HAD ADVISED THE CUSTOMER OF THE ADVANTAGES OF A DEFINED BENEFIT PLAN. THE CUSTOMER ALLEGES THAT THE FC GAVE THEM ERRONEOUS ADVICE CONCERNING LOANS MADE FROM THE DBP AND PURCHASE OF REAL PROPERTY.
Product Type:	No Product
Alleged Damages:	\$0.00

Customer Complaint Information

Date Complaint Received:	
Complaint Pending?	No
Status:	Settled
Status Date:	10/17/2008
Settlement Amount:	\$75,000.00
Individual Contribution Amount:	\$75,000.00

Civil Litigation Information

Type of Court:	State Court
Name of Court:	SUPERIOR COURT OF CALIFORNIA
Location of Court:	LOS ANGELES
Docket/Case #:	CASE NO.: SC 100191
Date Notice/Process Served:	10/17/2008
Litigation Pending?	No
Disposition:	Monetary Judgment to Customer
Disposition Date:	10/28/2009



Monetary Compensation Amount:	\$75,000.00
Individual Contribution Amount:	\$75,000.00



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 7

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Western International Securities, Inc.
Allegations:	Unsuitability; Misrepresentation & Fraud; Unauthorized Trading; Breach of Fiduciary Duty
Product Type:	Debt-Corporate Equity Listed (Common & Preferred Stock) Mutual Fund
Alleged Damages:	\$433,079.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	19-01253
Date Notice/Process Served:	05/22/2019
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	12/11/2019
Monetary Compensation Amount:	\$225,000.00
Individual Contribution Amount:	\$0.00

Disclosure 2 of 7

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Western International Securities, Inc.



Allegations:	Unsuitability; Breach of Fiduciary Duty
Product Type:	Equity Listed (Common & Preferred Stock) Mutual Fund
Alleged Damages:	\$1,761,558.00
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:	11/26/2018
Complaint Pending?	No
Status:	Evolved into Arbitration/CFTC reparation (the individual is a named party)
Status Date:	03/07/2019
Settlement Amount:	

**Individual Contribution
Amount:**

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	19-00667
Date Notice/Process Served:	03/18/2019
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	12/31/2019
Monetary Compensation Amount:	\$1,000,000.00
Individual Contribution Amount:	\$0.00



Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	Western International Securities, Inc.
Allegations:	Customer unhappy with performance of fixed income investment
Product Type:	Debt-Corporate
Alleged Damages:	\$62,250.00
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:	05/17/2017
Complaint Pending?	No
Status:	Settled
Status Date:	05/17/2017
Settlement Amount:	\$62,250.00
Individual Contribution Amount:	\$62,250.00
Broker Statement	The investment was suitable for the customer. The customer wanted higher returns than the customer was receiving from common stocks, and was fully advised of the possible risks of the investment. As with all investments, performance cannot be guaranteed.

Disclosure 4 of 7

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Western International Securities, Inc.
Allegations:	Unsuitable recommendations
Product Type:	Promissory Note
Alleged Damages:	\$231,688.55



Is this an oral complaint? No
Is this a written complaint? Yes
Is this an arbitration/CFTC reparation or civil litigation? Yes
Arbitration/Reparation forum or court name and location: FINRA
Docket/Case #: 17-00123
Filing date of arbitration/CFTC reparation or civil litigation: 01/10/2017

Customer Complaint Information

Date Complaint Received: 03/10/2017
Complaint Pending? No
Status: Settled
Status Date: 04/04/2018
Settlement Amount: \$45,000.00
Individual Contribution Amount: \$0.00

Reporting Source: Broker
Employing firm when activities occurred which led to the complaint: Western International Securities, Inc.
Allegations: Unsuitable recommendations
Product Type: Promissory Note
Alleged Damages: \$231,688.55
Is this an oral complaint? No
Is this a written complaint? Yes
Is this an arbitration/CFTC reparation or civil litigation? Yes



**Arbitration/Reparation forum
or court name and location:** FINRA

Docket/Case #: 17-00123

**Filing date of
arbitration/CFTC reparation
or civil litigation:** 01/10/2017

Customer Complaint Information

Date Complaint Received: 03/10/2017

Complaint Pending? Yes

Settlement Amount:

**Individual Contribution
Amount:**

Disclosure 5 of 7

Reporting Source: Broker

**Employing firm when
activities occurred which led
to the complaint:** WESTERN INTERNATIONAL SECURITIES, INC.

Allegations: MATTER WAS SETTLED BETWEEN REP & CLIENT FOR A TRADE NOT EXECUTED ON 05/20/2014

Product Type: Debt-Corporate

Alleged Damages: \$47,000.00

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: 07/24/2015

Complaint Pending? No

Status: Settled

Status Date: 07/24/2015



Settlement Amount: \$47,000.00
Individual Contribution Amount: \$47,000.00

Disclosure 6 of 7

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: FIRST ALLIED SECURITIES, INC. AND WESTERN INTERNATIONAL SECURITIES, INC.

Allegations: AT FIRST ALLIED 7/2007 TO 3/2009. THE CLAIMANTS ALLEGE BREACH OF FIDUCIARY DUTY; FRAUD AND MISREPRESENTATION; NEGLIGENCE AND NEGLIGENT SUPERVISION; BREACH OF CONTRACT; VIOLATION OF STATE AND FEDERAL LAWS; FAILURE TO SUPERVISE;AND BREACH OF FINRA RULES.

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

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): AMOUNT UNSPECIFIED BUT BELIEVED TO EXCEED \$5,000.

Is this an oral complaint? No

Is this a written complaint? No

Is this an arbitration/CFTC reparation or civil litigation? Yes

Arbitration/Reparation forum or court name and location: FINRA DISPUTE RESOLUTION

Docket/Case #: 14-02643

Filing date of arbitration/CFTC reparation or civil litigation: 04/29/2015

Customer Complaint Information

Date Complaint Received: 05/01/2015

Complaint Pending? No

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



Status Date: 05/01/2015

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

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

Docket/Case #: 14-02643

Date Notice/Process Served: 05/01/2015

Arbitration Pending? No

Disposition: Settled

Disposition Date: 05/24/2016

Monetary Compensation Amount: \$290,000.00

Individual Contribution Amount: \$45,000.00

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: WESTERN INTERNATIONAL SECURITIES, INC.

Allegations: EXCESSIVE & IMPROPER COMMISSION CHARGES IN ADDITION TO UNAUTHORIZED TRADING during the period 2010 through 2013

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

Alleged Damages: \$165,000.00

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation? Yes



**Arbitration/Reparation forum
or court name and location:** FINRA

Docket/Case #: 14-02643

**Filing date of
arbitration/CFTC reparation
or civil litigation:** 08/26/2014

Customer Complaint Information

Date Complaint Received: 05/22/2014

Complaint Pending? No

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

Status Date: 08/26/2014

Settlement Amount:

**Individual Contribution
Amount:**

Arbitration Information

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

Docket/Case #: 14-02643

Date Notice/Process Served: 05/22/2014

Arbitration Pending? No

Disposition: Settled

Disposition Date: 05/24/2016

**Monetary Compensation
Amount:** \$290,000.00

**Individual Contribution
Amount:** \$45,000.00

Disclosure 7 of 7

Reporting Source: Broker



Employing firm when activities occurred which led to the complaint:	WESTERN INTERNATIONAL SECURITIES, INC.
Allegations:	OVER CONCENTRATION WITH INADEQUATE PUT COVERAGE
Product Type:	Options
Alleged Damages:	\$140,000.00
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:	08/06/2012
Complaint Pending?	No
Status:	Settled
Status Date:	10/10/2012
Settlement Amount:	\$81,296.00
Individual Contribution Amount:	\$0.00



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 3

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	FIRST ALLIED SECURITIES, INC.
Allegations:	CLIENT IS ALLEGING THAT REGISTERED REPRESENTATIVE, ALONG WITH ANOTHER INSURANCE AGENT, MISLEAD HER REGARDING THE STATUS OF A RIDER GUARANTEE ON HER ANNUITY CONTRACT.
Product Type:	Annuity-Variable
Alleged Damages:	\$35,535.36
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:	01/05/2009
Complaint Pending?	No
Status:	Closed/No Action
Status Date:	12/14/2010
Settlement Amount:	
Individual Contribution Amount:	

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	FIRST ALLIED SECURITIES, INC.
Allegations:	CLIENT IS ALLEGING THAT REGISTERED REPRESENTATIVE, ALONG WITH



ANOTHER INSURANCE AGENT, MISLEAD HER REGARDING THE STATUS OF A RIDER GUARANTEE ON HER ANNUITY CONTRACT.

Product Type: Annuity-Variable
Alleged Damages: \$35,535.36
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: 01/05/2009
Complaint Pending? No
Status: Closed/No Action
Status Date: 12/14/2010
Settlement Amount:
Individual Contribution Amount:

Disclosure 2 of 3

Reporting Source: Broker
Employing firm when activities occurred which led to the complaint: FIRST ALLIED SECURITIES, INC.
Allegations: CLIENT CLAIMS HE DID NOT SIGN THE OPTION AGREEMENT, SIGNED 12/19/2006, TO EFFECT PURCHASE OF REVERSE CONVERTIBLE NOTES.
Product Type: Debt - Corporate
Alleged Damages: \$0.00

Customer Complaint Information

Date Complaint Received: 04/24/2007
Complaint Pending? No
Status: Closed/No Action
Status Date: 07/20/2007

**Settlement Amount:****Individual Contribution Amount:****Disclosure 3 of 3****Reporting Source:** Broker**Employing firm when activities occurred which led to the complaint:** FIRST ALLIED SECURITIES, INC.**Allegations:** [CUSTOMER] ALLEGED THAT SHE WAS NOT INFORMED OF HOW THE STRUCTURED PRODUCTS HELD IN HER DEFINED BENEFIT PLAN COULD POTENTIALLY LOSE VALUE BECAUSE OF THE STOCK PUT OPTION ASSOCIATED WITH THEM. SHE BEGAN FORMALLY QUESTIONING THIS ACTIVITY IN HER LETTER DATED 8/28/06. IN HER LETTER OF 10/4/2006 SHE REQUESTS REIMBURSEMENT OF \$7402.88 FOR "DEFICIENCIES" IN HER ACCOUNT.**Product Type:** Other**Other Product Type(s):** REVERSE CONVERTIBLES**Alleged Damages:** \$7,402.88**Customer Complaint Information****Date Complaint Received:** 10/04/2006**Complaint Pending?** No**Status:** Closed/No Action**Status Date:** 04/20/2007**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 1

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Western International Securities, Inc.
Allegations:	Unsuitability; Breach of Fiduciary Duty
Product Type:	Equity Listed (Common & Preferred Stock) Mutual Fund Other: Exchange-Traded Fund (ETF)
Alleged Damages:	\$3,084,342.00
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:	02/14/2020
Complaint Pending?	Yes
Settlement Amount:	
Individual Contribution Amount:	



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:	State of California
Judgment/Lien Amount:	\$2,031.08
Judgment/Lien Type:	Tax
Date Filed with Court:	02/22/2018
Date Individual Learned:	04/17/2018
Type of Court:	Recorder's Office
Name of Court:	Los Angeles County Recorder's Office
Location of Court:	Los Angeles, CA
Docket/Case #:	20180176851
Judgment/Lien Outstanding?	Yes

End of Report



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