



IAPD Report

GARY GUSTAVE BENSON

CRD# 1182211

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Please contact FINRA with any concerns.



IAPD Information About Representatives

IAPD offers information on all current-and many former representatives. Investors are strongly encouraged to use IAPD to check the background of representatives before deciding to conduct, or continue to conduct, business with them.

What is included in a IAPD report?

IAPD reports for individual representatives include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards.

It is important to note that the information contained in an IAPD 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 representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

Where did this information come from?

The information contained in IAPD comes from the Investment Adviser Registration Depository (IARD) and FINRA's Central Registration Depository, or CRD, (see more on CRD below) and is a combination of:

- information the states require representatives and firms to submit as part of the registration and licensing process, and
- information that state regulators report regarding disciplinary actions or allegations against representatives.

How current is this information?

Generally, representatives are required to update their professional and disciplinary information in IARD within 30 days.

Need help interpreting this report?

For help understanding how to read this report, please consult NASAA's IAPD Tips page <http://www.nasaa.org/IAPD/IARReports.cfm>

What if I want to check the background of an Individual Broker or Brokerage Firm?

To check the background of an Individual Broker or Brokerage firm, you can search for the firm or individual in IAPD. If your search is successful, click on the link provided to view the available licensing and registration information in FINRA's BrokerCheck website.

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

It is recommended that you learn as much as possible about an individual representative or Investment Adviser firm before deciding to work with them. Your state securities regulator can help you research individuals and certain firms doing business in your state. The contact information for state securities regulators can be found on the website of the North American Securities Administrators Association <http://www.nasaa.org>



Report Summary

GARY GUSTAVE BENSON (CRD# 1182211)

The report summary provides an overview of the representative's professional background and conduct. The information contained in this report has been provided by the representative, investment adviser and/or securities firms, and/or securities regulators as part of the states' investment adviser registration and licensing process. The information contained in this report was last updated by the representative, a previous employing firm, or a securities regulator on **11/11/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	INDEPENDENT FINANCIAL GROUP, LLC	CRD# 7717	07/15/2022
IA	INDEPENDENT FINANCIAL GROUP, LLC	CRD# 7717	07/27/2022

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **23** jurisdiction(s).

Is this representative currently Inactive or Suspended with any regulator? **No**

Note: Not all jurisdictions require IAR registration or may have an exemption from registration.

Additional information including this individual's qualification examinations and professional designations is available in the Detailed Report.

REGISTRATION HISTORY

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

	FIRM	CRD#	LOCATION	REGISTRATION DATES
IA	PASH & BENSON INTERNATIONAL LTD.	135876	ENCINO, CA	09/19/2006 - 01/21/2025
IA	NPB FINANCIAL GROUP, LLC	137743	ENCINO, CA	05/11/2006 - 07/28/2022
B	NPB FINANCIAL GROUP, LLC	137743	ENCINO, CA	05/11/2006 - 07/15/2022

For additional registration and employment history details as reported by the individual, refer to the Registration and Employment History section of the Detailed Report.

DISCLOSURE INFORMATION

Disclosure events include certain criminal charges and convictions, formal investigations and disciplinary actions initiated by regulators, customer disputes and arbitrations, and financial disclosures such as bankruptcies and unpaid judgments or liens.

Are there events disclosed about this representative? **Yes**

The following types of events are disclosed about this representative:

Type	Count
Customer Dispute	11



Qualifications

REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works. This individual is currently registered with **23** jurisdiction(s) and 1 SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **INDEPENDENT FINANCIAL GROUP, LLC**
Main Address: 12671 HIGH BLUFF DR
SUITE 200
SAN DIEGO, CA 92130
Firm ID#: 7717

	Regulator	Registration	Status	Date
B	FINRA	General Securities Principal	Approved	07/15/2022
B	FINRA	General Securities Representative	Approved	07/15/2022
B	Arizona	Agent	Approved	07/15/2022
B	California	Agent	Restricted Approval	07/27/2022
IA	California	Investment Adviser Representative	Restricted Approval	07/27/2022
B	Colorado	Agent	Approved	07/15/2022
B	Florida	Agent	Approved	07/19/2022
B	Georgia	Agent	Approved	07/15/2022
B	Idaho	Agent	Approved	07/15/2022
B	Indiana	Agent	Approved	07/15/2022
B	Iowa	Agent	Approved	07/15/2022
B	Maryland	Agent	Approved	07/15/2022



Qualifications

Regulator	Registration	Status	Date
B Michigan	Agent	Approved	07/15/2022
B Minnesota	Agent	Approved	07/15/2022
B Nevada	Agent	Approved	07/15/2022
B New Jersey	Agent	Approved	07/15/2022
B New York	Agent	Approved	07/15/2022
B Oklahoma	Agent	Approved	07/15/2022
B Oregon	Agent	Approved	07/15/2022
B Pennsylvania	Agent	Approved	07/15/2022
B Tennessee	Agent	Approved	07/27/2022
B Texas	Agent	Approved	07/15/2022
B Vermont	Agent	Approved	07/15/2022
B Virginia	Agent	Approved	07/15/2022
B Washington	Agent	Approved	07/15/2022
B Wyoming	Agent	Approved	07/15/2022

Branch Office Locations

INDEPENDENT FINANCIAL GROUP, LLC
6345 Balboa Blvd. Building 1
Suite 100
ENCINO, CA 91316




Qualifications

PASSED INDUSTRY EXAMS



This section includes all industry exams that the representative has passed. Under limited circumstances, a representative may attain registration after receiving an exam waiver based on a combination of exams the representative has passed and qualifying work experience. Likewise a new exam requirement may be grandfathered based on a representative's specific qualifying work experience. Exam waivers and grandfathering are not included below.

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


Principal/Supervisory Exams

	Exam	Category	Date
	General Securities Principal Examination (S24)	Series 24	07/09/1987

General Industry/Product Exams

	Exam	Category	Date
	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
	General Securities Representative Examination (S7)	Series 7	05/19/1984

State Securities Law Exams

	Exam	Category	Date
	Uniform Securities Agent State Law Examination (S63)	Series 63	08/21/1987

PROFESSIONAL DESIGNATIONS

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

No information reported.



Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
IA	09/19/2006 - 01/21/2025	PASH & BENSON INTERNATIONAL LTD.	CRD# 135876	ENCINO, CA
IA	05/11/2006 - 07/28/2022	NPB FINANCIAL GROUP, LLC	CRD# 137743	ENCINO, CA
B	05/11/2006 - 07/15/2022	NPB FINANCIAL GROUP, LLC	CRD# 137743	ENCINO, CA
B	09/17/1999 - 05/12/2006	NATIONAL PLANNING CORPORATION	CRD# 29604	ENCINO, CA
B	05/23/1984 - 09/21/1999	ASSOCIATED SECURITIES CORP.	CRD# 12969	BOSTON, MA
B	06/12/1984 - 06/26/1984	MUTUAL BENEFIT FINANCIAL SERVICE COMPANY	CRD# 4882	

EMPLOYMENT HISTORY

Below is the representative's employment history for up to the last 10 years.

Employment Dates	Employer Name	Position	Investment Related	Employer Location
07/2022 - Present	INDEPENDENT FINANCIAL GROUP, LLC	Mass Transfer	Y	ENCINO, CA, United States
07/1981 - 01/2025	PASH & BENSON INTERNATIONAL LTC	VICE PRESIDENT	Y	ENCINO, CA, United States
05/2006 - 07/2022	NPB FINANCIAL GROUP LLC	REG REP	Y	ENCINO, CA, United States

OTHER BUSINESS ACTIVITIES

This section includes information, if any, as provided by the representative regarding other business activities the representative 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) Insurance

POSITION: Officer/Director NATURE: Insurance outside of IFG INVESTMENT RELATED: Yes NUMBER OF HOURS: 20
SECURITIES TRADING HOURS: 10 START DATE: 02/15/1990
ADDRESS: 5435 Balboa Blvd, Suite #106, Encino CA 91316, United States
DESCRIPTION: Outside Insurance.

(2) PAXTON CONSULTING GROUP

POSITION: Consultant NATURE: Business Entity for Tax/Investment Purposes INVESTMENT RELATED: No NUMBER OF



Registration & Employment History



OTHER BUSINESS ACTIVITIES

HOURS: 20 SECURITIES TRADING HOURS: 20 START DATE: 09/27/2023
ADDRESS: 5435 Balboa Blvd, Suite #106, Encino CA 91316, United States
DESCRIPTION: None

(3) ADVISOR ASSOCIATE

POSITION: Agent/Representative NATURE: DBA Name for Marketing Purposes Only INVESTMENT RELATED: Yes NUMBER OF HOURS: 5 SECURITIES TRADING HOURS: 5 START DATE: 05/21/2024
ADDRESS: 5435 Balboa Blvd, Suite #106, Encino CA 91316, United States
DESCRIPTION: Marketing DBA for financial services.



Disclosure Summary

Disclosure Information

What you should know about reported disclosure events:

(1) Certain thresholds must be met before an event is reported to IARD, for example:

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

(2) Disclosure events in IAPD reports come from different sources:

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, 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 IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

(3) There are different statuses and dispositions for disclosure events:

- A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
 - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure 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 represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

(4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.



DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

Type	Count
Customer Dispute	11

Customer Dispute

This section provides information regarding a customer dispute that was reported to the Investment Adviser Registration Depository (IARD) by the Investment Adviser Representative (IAR), an investment adviser and/or securities firm, and/or a securities regulator. The event may include a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit that contains allegations of sales practice violations against the individual.

The customer dispute may be pending or may have resulted in a civil judgment, arbitration award, monetary settlement, closure without action, withdrawal, dismissal, denial, or other outcome.

Disclosure 1 of 11

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	NPB FINANCIAL GROUP, LLC
Allegations:	Claimant alleges product was not suitable
Product Type:	Other: Alternative Product (L Bond)
Alleged Damages:	\$200,000.00
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 #:	22-02313
Filing date of arbitration/CFTC reparation or civil litigation:	10/13/2022

Customer Complaint Information

Date Complaint Received:	10/13/2022
Complaint Pending?	No
Status:	Settled



Status Date: 02/05/2024

Settlement Amount: \$95,000.00

Individual Contribution Amount: \$70,000.00

Broker Statement In an effort to resolve the issue without the need for protracted litigation, the claim was settled for payment of \$95,000. Settlement should not be deemed to be an admission of guilt or liability of the current firm, the prior firm or the representative. Investment was suitable and was in line with claimant's stated investment objectives and risk tolerance. Claimant insisted on investing over three times the amount advisor recommended. Claimant did not lose money in their diversified portfolio. Claimant had profits in their diversified portfolio of over \$650,000. This was a claim related to the failure of a product (one which the client had previously invested in profitably). The failure of a product or the failure of a product to perform as intended does not give rise to a suitability claim; however, settlement avoids the risk of an unfavorable award or one far in excess of any amount at issue.

Disclosure 2 of 11

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: NPB FINANCIAL GROUP, LLC

Allegations: Client alleges Inaccurate minimum income figures were provided to client on one of annuities purchased. Client has two other annuities with minimum income benefits. They have increased to higher minimum income amounts. The combined total minimum income benefits on all annuities are higher than amounts originally presented. The combined total amount client invested in all annuities is much higher in value. Client is not financially harmed.

Product Type: Annuity-Variable

Alleged Damages: \$5,500.00

Alleged Damages Amount Explanation (if amount not exact): No final alleged compensation damages noted by client.

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: 04/13/2022

Complaint Pending? No

Status: Settled

Status Date: 09/12/2022

Settlement Amount: \$142,500.00

Individual Contribution Amount: \$50,000.00

Broker Statement Insurance company provided Gary Benson incorrect minimum income figures



through an annuity when originally presented to customer. When customer turned age 65 the minimum income from this annuity was less than originally presented by \$290 per month. Gary Benson had recommended two additional annuities to customer previously. When the customer turned age 65 these two annuities performed well and combined minimum income from these annuities was \$495 per month greater than projected. With diversity and planning the customer was not financially harmed and the net minimum income the customer would receive was \$205 per month more than originally planned. Customer was in a better financial position at age 65 on all combined annuities than originally planned. Gary Benson made a business decision to settle his complaint. The legal fees to defend this complaint would be over \$100,000 due to the current legal system.

IMPORTANT NOTE: With diversity and planning this customer was not financially harmed and was in a better position financially with the income from annuities and the values on all customer's accounts.

With all planning completed for this client, client's protected income is higher and account values are higher than originally disclosed. Client is not financially harmed.

Disclosure 3 of 11

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: NPB Financial Group, LLC

Allegations: Unauthorized and Unsuitable Trading.

Product Type: Mutual Fund

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): Dollar amount unknown. Client has not requested any specific dollar amount.

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: 08/22/2017

Complaint Pending? No

Status: Closed/No Action

Status Date: 08/28/2018

Settlement Amount:



Individual Contribution Amount:

Broker Statement

This was part of a FINRA Cause Exam for this office and there were no findings in the Exception Letter in regards to [REDACTED].

Disclosure 4 of 11

Reporting Source:

Individual

Employing firm when activities occurred which led to the complaint:

NPB FINANCIAL GROUP, LLC

Allegations:

[CUSTOMER] CLAIMS SHE SHOULD HAVE BEEN BENEFICIARY ON HER SISTER'S ([FAMILY MEMBER]) IRA ACCOUNT. [FAMILY MEMBER] CHOSE NOT TO LIST [CUSTOMER] AS BENEFICIARY AT ANY TIME.
First Cause of Action for Conversion. Second Cause of Action for Breach of Fiduciary Duty and Third Cause of Action for Imposition of a Constructive Trust.

Product Type:

No Product

Alleged Damages:

\$325,000.00

Alleged Damages Amount Explanation (if amount not exact):

THIS IS THE DOLLAR AMOUNT IN THE IRA ACCOUNT THAT [CUSTOMER] WAS NOT LISTED AS BENEFICIARY.
According to proof at trial.

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:

SUPERIOR COURT STATE OF CA, LOS ANGELES COUNTY

Docket/Case #:

BP153451

Filing date of arbitration/CFTC reparation or civil litigation:

06/27/2014

Customer Complaint Information

Date Complaint Received:

07/03/2014

Complaint Pending?

No

Status:

Settled

Status Date:

12/16/2015

Settlement Amount:

\$210,000.00

Individual Contribution Amount:

\$210,000.00

Civil Litigation Information

Type of Court:

State Court

Name of Court:

SUPERIOR COURT STATE OF CA, LOS ANGELES COUNTY

Location of Court:

LOS ANGELES, CA USA

Docket/Case #:

BP153451



Date Notice/Process Served: 07/03/2014
Litigation Pending? No
Disposition: Settled
Disposition Date: 12/16/2015
Monetary Compensation Amount: \$210,000.00
Individual Contribution Amount: \$210,000.00

Broker Statement

MR. BENSON HAD A LONG TERM FINANCIAL RELATIONSHIP WITH CLIENTS, [FAMILY MEMBER & SPOUSE] FOR OVER 19 YEARS. THEY HAD TWO DAUGHTERS THAT NEVER GOT ALONG. [FAMILY MEMBER] HAD AN IRA ACCOUNT. WHEN [FAMILY MEMBER] DIED, EACH DAUGHTER RECEIVED THEIR 50% INHERITED IRAS. BOTH DAUGHTERS LISTED AND MADE CHANGES TO THEIR BENEFICIARIES ACCORDING TO EACH OF THEIR DESIRES. BOTH WERE COMPETENT IN MAKING THESE DECISIONS. ONE DAUGHTER, [FAMILY MEMBER], PASSED AWAY 12/25/2013. THE OTHER DAUGHTER, [CUSTOMER], CLAIMS [FAMILY MEMBER'S] IRA SHOULD GO TO HER AND FILED THIS COMPLAINT. [FAMILY MEMBER] HAD CONSULTED WITH TWO INDEPENDENT ATTORNEYS AND HAD INDICATED TO EACH OF THE ATTORNEYS SHE DID NOT WANT ANY OF HER ASSETS TO GO TO [CUSTOMER] OR ANY RELATIVE [CUSTOMER] IS CLAIMING. [FAMILY MEMBER] WAS COMPETENT AND THE TWO INDEPENDENT ATTORNEYS CAN TESTIFY SHE WAS NOT INCOMPETENT AND WILLINGLY NAMED HER BENEFICIARIES ACCORDING TO HER DESIRES.
Based on two August 28, 2018, FINRA Exam comment letters, NPB is amending #4 and #6 above to reflect "Allegations" and "Damages" as stated in the Complaint.

Disclosure 5 of 11

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: ASSOCIATED SECURITIES CORPORATION
Allegations: MISUNDERSTANDING AND LACK OF DETAILED INFORMATION ON INVESTMENT
Product Type: Direct Investment-DPP & LP Interests
Alleged Damages: \$30,000.00
Is this an oral complaint? No
Is this a written complaint? Yes
Is this an arbitration/CFTC reparation or civil litigation? No

Customer Complaint Information

Date Complaint Received: 09/01/2011
Complaint Pending? No
Status: Settled
Status Date: 10/11/2011



Settlement Amount: \$30,000.00

Individual Contribution Amount: \$30,000.00

Disclosure 6 of 11

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: NPB FINANCIAL GROUP, LLC

Allegations: FAILED TO CONDUCT A REASONABLE DUE DILIGENCE, MISREPRESENTATION AND UNSUITABLE INVESTMENT FOR CLAIMANT GIVEN HER FINANCIAL SITUATION, NEEDS AND INVESTMENT OBJECTIVES.

Product Type: Other: TIC INVESTMENT

Alleged Damages: \$348,500.00

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 #: 12-04044

Filing date of arbitration/CFTC reparation or civil litigation: 12/04/2012

Customer Complaint Information

Date Complaint Received: 12/10/2012

Complaint Pending? No

Status: Settled

Status Date: 12/24/2013

Settlement Amount: \$225,000.00

Individual Contribution Amount: \$225,000.00

Broker Statement

IN JULY OF 2007, CORIN FROM OUR OFFICE SON'S FATHER-IN-LAW, JERRY CALLED AND ASKED IF WE HAD PROPERTIES AVAILABLE FOR TENANTS IN COMMON 1031 EXCHANGES FOR A RELATIVE OF HIS. WE HAD SHOWN JERRY A FEW PREVIOUSLY AND HE INVESTED IN AN AEI 1031 AND A WELLS 1031 EXCHANGE. HE INDICATED A RELATIVE HAD SOLD A PROPERTY AND WAS IN THEIR 45 DAY IDENTIFICATION PERIOD. HE HAD [CUSTOMER'S] BROTHER OR BROTHER-IN-LAW, [THIRD PARTY], CONTACT ME.

I REVIEWED 1031 PROPERTIES WE HAD AVAILABLE. [THIRD PARTY] INDICATED ALL THEY WOULD WANT FROM ME IS TO PROVIDE PROPERTIES TO CONSIDER FOR [CUSTOMER]. I INDICATED I COULD PROVIDE THEM WITH SOME HOWEVER [CUSTOMER] AND [THIRD PARTY] AND [CUSTOMER'S] ATTORNEYS AND ACCOUNTANTS MUST REVIEW TO DETERMINE IF APPROPRIATE FOR [CUSTOMER].



INITIALLY I INDICATED WE HAD A PROPERTY THROUGH INLAND AVAILABLE BUT IT WOULD CLOSE VERY SOON WITH A MINIMUM OF \$467,000. THEY COULD NOT REVIEW IN THIS SHORT PERIOD WHICH IS UNDERSTANDABLE.

I THEN SHOWED THEM A NNN OFFICE BUILDING WITH A MINIMUM PURCHASE OF \$350,000 AND TWO PROPERTIES FROM SPECTRUS (DBSI) WHICH HAD MINIMUMS OF \$150,000 EACH. ALL PROPERTIES' AND INFORMATION WAS SENT TO [CUSTOMER] AND [THIRD PARTY].

I INDICATED TO THEM THEY NEED TO REVIEW THESE WITH THEIR ACCOUNTANT AND LAWYER AS I WAS ONLY PROVIDING AVAILABLE PROPERTIES TO THEM.

I TOLD THEM IF THEY WERE INTERESTED IN ANY OF THE PROPERTIES WE COULD ASSIST IN CLOSING ON THEM.

Disclosure 7 of 11

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	NPB FINANCIAL GROUP, LLC
Allegations:	[CUSTOMER] SOLD A PROPERTY AND DID NOT WANT TO PAY TAXES. SHE DID A 1031 EXCHANGE INTO 3 TIC INVESTMENTS. THE 3 PROPERTIES ARE CURRENTLY NOT PAYING AN INCOME. [CUSTOMER]FEELS THESE RECOMMENDATIONS WERE UNSUITABLE.
Product Type:	Other: TIC INVESTMENTS
Alleged Damages:	\$483,724.00
Alleged Damages Amount Explanation (if amount not exact):	THIS IS THE AMOUNT INVESTED IN THE THREE TIC PROPERTIES.
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 #:	12-03825
Filing date of arbitration/CFTC reparation or civil litigation:	11/01/2012
Customer Complaint Information	
Date Complaint Received:	01/02/2013
Complaint Pending?	No
Status:	Settled
Status Date:	02/28/2014
Settlement Amount:	\$215,000.00



Individual Contribution Amount: \$25,000.00

Arbitration Information

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

Docket/Case #: 12-03825

Date Notice/Process Served: 01/02/2013

Arbitration Pending? No

Disposition: Settled

Disposition Date: 02/28/2014

Monetary Compensation Amount: \$215,000.00

Individual Contribution Amount: \$25,000.00

Broker Statement

[CUSTOMER] FIRST CAME IN ON 9/5/2006. SHE WAS REFERRED BY A CLIENT OF [THIRD PARTY'S]. [CUSTOMER] WAS LISTING HER 4-PLEX. SHE LIVED IN ONE OF THE UNITS AND MANAGED THE PROPERTY FOR 17 YEARS. HER PLAN WAS TO LIST THE PROPERTY FOR \$1,300,000 MILLION. THE PROPERTY WAS LOCATED IN VALLEY VILLAGE. SHE INDICATED SHE PAID \$440,000 IN 1990 AND HAD PUT ABOUT \$80,000-\$90,000 IN IMPROVEMENTS. SHE HAD A FIRST MORTGAGE OF \$400,000 AND A HOME EQUITY LINE OF \$200,000 ON THE PROPERTY.

[CUSTOMER] WAS 61 AND WOULD BE 62 IN 2007 AND PLANNED ON RECEIVING HER SOCIAL SECURITY INCOME. HER ASSETS CONSISTED OF THIS PROPERTY, \$210,000 IN CASH IN THE BANK, AND AN OPPENHEIMER BROKERAGE ACCOUNT VALUE AT ABOUT \$90,000.

SHE PLANNED TO RECEIVE SOCIAL SECURITY THE FOLLOWING YEAR. SHE INDICATED WITH THE INCOME CURRENTLY FROM HER 4-PLEX SHE WAS NOT ABLE TO MEET HER CURRENT EXPENSES.

[CUSTOMER] WANTED TO SELL THE 4-PLEX AND MOVE TO TEXAS.

WE REVIEWED OPTIONS OF SELLING AND PAYING TAXES OR DOING A 1031 ON 75% OF THE PROCEEDS AND INVESTING IN MANAGED REAL ESTATE PROPERTIES USING A TENANT IN COMMON STRATEGY OR HER INVESTING DIRECTLY IN OTHER RENTAL PROPERITES. WE SPEND TIME ON THE PROS AND CONS OF BOTH STRATEGIES.

IF [CUSTOMER] SOLD THE PROPERTY WITHOUT DOING A 1031 EXCHANGE WE ESTIMATED SHE WOULD PAY ABOUT \$195,000 IN COMBINED FEDERAL AND STATE TAXES.

WE REVIEWED OPTIONS OF [CUSTOMER] PAYING THE TAX AND INVESTING THE PROCEEDS FOR INCOME OR DOING A 1031 EXCHANGE AND DEFERRING THE TAXES OF \$200,000. WE TOLD HER TO REVIEW THESE OPTIONS WITH HER ACCOUNTANT AND ATTORNEY.

[CUSTOMER] WANTED TO RECEIVE THE MAXIMUM AMOUNT OF INCOME FROM THE SALE PROCEEDS AND DID NOT WANT TO PAY \$200,000 IN TAXES SO [CUSTOMER] DECIDED TO DO A 1031 EXCHANGE AND WE TOLD



HER WE WOULD PROVIDE HER SOME PROPERTIES TO REVIEW AND TOLD HER TO LOOK FOR PROPERTIES HERSELF AS WELL.

ON FEBRUARY 18, 2007, HER PROPERTY SOLD. SHE RECEIVED ABOUT \$150,000+ OF CASH FROM THE 25% RESIDENCE PORTION TO BE USED FOR BUYING A PROPERTY IN TEXAS AND ABOUT \$480,000 TO BE USED FOR A 1031 EXCHANGE.

WE STARTED DISCUSSING PROPERTIES SHE COULD DO AN EXCHANGE INTO AND NARROWED THE CHOICES TO THE FOLLOWING:

INLAND PEWAUKEE OFFICE BUILDING
NNN CULVER MEDICAL
NNN SPRINGFIELD APARTMENTS
NNN CHARTWELL APARTMENTS

THE NEGATIVE WITH INLAND WAS THAT THE MINIMUM INVESTMENT WAS \$450,000.

TO MINIMIZE RISK, WE DISCUSSED AND [CUSTOMER] DECIDED TO DIVERSIFY IN THE THREE NNN PROPERTIES. ON 8/15/2007, THE FOLLOWING AMOUNTS WERE EXCHANGED AND INVESTED.

\$200,000 NNN CULVER MEDICAL
\$140,000 NNN SPRINGFIELD APARTMENTS
\$157,904 NNN CHARTWELL APARTMENTS [CUST] WENT AND SAW THIS PROPERTY AND LIKED IT)

THESE PROPERTIES WERE PERFORMING WELL, EACH PAYING ABOUT 6% INCOME UNTIL THE BEGINNING OF 2009 AFTER THE 2008 DECLINE IN ALL MARKETS. THE INCOME ON THESE WAS CUT IN HALF TO 3%. [CUSTOMER] CONTACTED US AND IN ORDER TO INCREASE HER INCOME, WE STARTED SENDING HER FUNDS FROM HER OPPENHEIMER ACCOUNT WHICH SHE HAD TRANSFERRED TO US.

THE INCOME REMAINED AT THE 3% LEVEL AND IN 2010, CULVER MEDICAL WAS HAVING PROBLEMS AND THE INCOME WAS STOPPED. IN JUNE OF 2012 THE 3% INCOME WAS STOPPED ON CHARTWELL APARTMENTS AND WAS REDUCED TO 1.5% ON SPRINGFIELD. THE MAIN REASON FOR THE DECREASE WAS THE LOAN WAS INTEREST ONLY FOR THE FIRST FIVE YEARS AND NOW IS WAS FULLY AMORTIZED.

I HAVE BEEN FOLLOWING THESE THREE PROPERTIES THE BEST I CAN. ALL THREE HAVE BEEN THROUGH MANAGEMENT CHANGES FROM NNN TO GRUB & ELLIS TO DAYMARK AND JUST RECENTLY THE TWO APARTMENTS HAVE CHANGE TO COTTONWOOD. CULVER MEDICAL IS NOT IN A GOOD POSITION HOWEVER A FIRM CALLED BREAKWATER IS WORKING TO MODIFY THE LOAN AND TURN THE PROPERTY AROUND, IN TIME HOPEFULLY.

THE TWO APARTMENTS SEEM TO BE GOOD PROPERTIES IN GOOD AREAS AND HOPEFULLY WITH NEW MANAGEMENT THE INCOME CAN INCREASE AND BE SOLD IN 3-5 YEARS.

AS A NOTE, IN MAY OF 2011, WE DISCUSSED WITH [CUST] A REVERSE



MORTGAGE TO ELIMINATE HER MORTGAGE PAYME

Disclosure 8 of 11

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: NATIONAL PLANNING CORP.

Allegations: BREACH OF FIDUCIARY DUTY

Product Type: Other: REAL ESTATE INVESTMENT

Alleged Damages: \$335,000.00

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: SUPERIOR COURT OF CA, COUNTY OF LOS ANGELES

Docket/Case #: BC448858

Filing date of arbitration/CFTC reparation or civil litigation: 11/30/2010

Customer Complaint Information

Date Complaint Received: 12/27/2010

Complaint Pending? No

Status: Settled

Status Date: 08/24/2012

Settlement Amount: \$110,000.00

Individual Contribution Amount: \$110,000.00

Civil Litigation Information

Type of Court: State Court

Name of Court: SUPERIOR COURT OF CA,

Location of Court: COUNTY OF LOS ANGELES

Docket/Case #: BC448858

Date Notice/Process Served: 12/30/2010

Litigation Pending? No

Disposition: Settled

Disposition Date: 08/24/2012

Monetary Compensation Amount: \$110,000.00

Individual Contribution Amount: \$110,000.00

**Disclosure 9 of 11**

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: NATIONAL PLANNING CORPORATION

Allegations: CUSTOMER ALLEGED THAT HER ING VARIABLE ANNUITY DOES NOT "WORK" AS ORIGINALLY PRESENTED IN 2000.

Product Type: Annuity-Variable

Alleged Damages: \$503,270.00

Is this an oral complaint? No

Is this a written complaint? Yes

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

Customer Complaint Information

Date Complaint Received: 09/03/2010

Complaint Pending? No

Status: Denied

Status Date: 07/17/2012

Settlement Amount:

Individual Contribution Amount:

Broker Statement

MAY, 2000 [CUSTOMERS] HIRED GARY BENSON TO PROVIDE A FINANCIAL PLAN. PLAN WAS PROVIDED IN MAY, 2000 AND AN ADDITIONAL PROPOSAL AS A FOLLOW UP TO THE PLAN WAS SENT TO THEM ON JUNE 6, 2000. AT THIS TIME A FEW INSURANCE COMPANIES WERE OFFERING ANNUITIES THAT HAD RIDERS WHICH WOULD ALLOW INDIVIDUALS TO INVEST IN MANY ASSET CLASSES AND WOULD ALSO PROVIDE A DOWNSIDE PROTECTION IF THERE WAS SEVERE MARKET CORRECTIONS OR DECREASES BY PROVIDING SOME MINIMUM AMOUNT OF A GUARANTEE. THE PLAN WE STATED IN GENERAL THAT THEY THAT COULD CONSIDER AN ANNUITY WITH A MINIMUM GUARANTEE OF 6%. AFTER A PLAN WAS PRESENTED TO THE [CUSTOMERS] AN ADDITIONAL PROPOSAL WAS SENT WITH A SPECIFIC ANNUITY RECOMMENDATION OF ING THAT PROVIDED DOWNSIDE MARKET PROTECTION WITH A MINIMUM 7% GUARANTEE WITH A MAXIMUM GUARANTEE OF DOUBLING. AT A 7% COMPOUNDING RATE THE MAXIMUM GUARANTEE OR DOUBLING WOULD OCCUR IN 10 YEARS. THERE WERE SEVERAL MEETINGS MADE BY PHONE REVIEWING THIS ANNUITY AND THEIR PLAN RECOMMENDATIONS. IT WAS EXPLAINED TO [CUSTOMERS] THAT WE HOPED THEY NEVER HAD TO USE OR EXERCISE THE GUARANTEE BUT IF THEY DID, THE EARLIEST THEY COULD EXERCISE THE GUARANTEE WAS AFTER THE 10TH YEAR CONTRACT ANNIVERSARY. IT WAS ALSO EXPLAINED SEVERAL TIMES THAT IF THE ACCOUNT VALUE WAS SIGNIFICANTLY BELOW THE GUARANTEED VALUE IN THE 10TH YEAR, IT WOULD BE ADVISABLE TO EXERCISE THE GUARANTEE AND THEY WOULD NEED TO ANNUITIZE THE GUARANTEED VALUE AND ING WOULD HAVE ANNUITIZATION OPTIONS TO CONSIDER. WE EXPLAINED SEVERAL TIMES TO THE [CUSTOMERS] THAT BY ANNUITIZING THE GUARANTEED



VALUE MAY NOT BE BAD AS IT WOULD PROVIDE A PENSION LIFE INCOME AND COULD BE ON A MUCH HIGHER VALUE THAN IF THE ACCOUNT WAS INVESTED WITH NO MINIMUM GUARANTEE. THE MAIN REASON THIS ING ANNUITY WAS RECOMMENDED WAS FOR THE GUARANTEED MINIMUM INCOME BENEFIT RIDER WHICH WOULD PROTECT AGAINST THE DOWNSIDE OF THE MARKET. SOON AFTER THE [CUSTOMERS] INVESTED IN THE ING ANNUITY THERE WAS THE TECH BUBBLE CRASH. THE ACTUAL ACCOUNT DROPPED BUT THE MINIMUM 7% COMPOUNDED RETURN CONTINUED TO GROW. WE REVIEWED THIS ACCOUNT AND THEIR OTHER ACCOUNTS OVER THE PAST 10 YEARS, RE-ALLOCATING TO RECOVER FROM THIS INITIAL DOWNSIDE IN THE MARKET. THEIR ACCOUNT WAS PROGRESSING BUT NEVER WAS CLOSE THE GUARANTEED VALUE AND WE INDICATED THEY SHOULD CONSIDER EXERCISING THIS GUARANTEE IN THE 10TH YEAR. WITH THE SIGNIFICANT DOWN TURN OF THE MARKET IN 2008, THEIR ING ACCOUNT VALUE DROPPED SIGNIFICANTLY TO LESS THAN THEIR ORIGINAL INVESTMENT. WE DID RE-ALLOCATE MORE IN BONDS IN JANUARY OF 2009. IN MARCH OF 2010 THE [CUSTOMERS] TERMINATED OUR SERVICES. IN MAY OF 2000, THE TIAA/CREF ACCOUNT WAS VALUED AT \$493,600 AND IN JANUARY OF 2010 THE VALUE WAS \$275,816 AS THIS ACCOUNT DID NOT HAVE ANY PROTECTION OF THE DOWNSIDE OF THE MARKETS. WE WERE REVIEWING THE ING ACCOUNT WITH THE [CUSTOMERS] IN JANUARY OF 2010 AND SUGGESTED EXERCISING THE GUARANTEE AT THEIR ANNIVERSARY DATE IN JULY OF 2010. THEY DID NOT HAVE TO EXERCISE THE GUARANTEE AND COULD HAVE RECEIVED THE ACCOUNT VALUE. WHEN I SPOKE WITH THE [CUSTOMERS] WE ALWAYS DISCUSSED AN AMOUNT TO WITHDRAW FROM THEIR TOTAL ACCOUNT VALUES TO BE USED FOR INCOME. THE AMOUNT WE RECOMMENDED USING WAS 5%. THE INCOME THE [CUSTOMERS] WILL RECEIVE FOR LIFE FROM ING IS \$27,388 PER YEAR. THIS IS A 5.4% INCOME BASED ON THE GUARANTEED VALUE. THIS MEETS THE INCOME DISCUSSED IN PRIOR YEAR CONVERSATIONS.

IN 2001, [CUSTOMER] SET UP ANOTHER ANNUITY ACCOUNT WITH SCUDDER DESTINATIONS WITH A GUARANTEED RETIREMENT INCOME BENEFIT. WE RECOMMENDED THIS AS WELL. THIS ACCOUNT PROVIDED A MINIMUM 5% GUARANTEE, HOWEVER AFTER YOU EXERCISE THE GUARANTEE BY ANNUITIZING IN THE 13TH MONTH YOU CAN COMMUTE THE INCOME AND RECEIVE OVER 90% OF THE GUARANTEED VALUE. EXERCISING THE GUARANTEE WAS DISCUSSED WITH THE [CUSTOMERS], AND THEY DID EXERCISE THE GUARANTEE ON THIS ACCOUNT. IN APRIL OF 2011, THEY CAN COMMUTE THE GUARANTEED VALUE AND RECEIVE ABOUT 92% OF THE GUARANTEED VALUE. CLAIM DENIED BY ING AND RR.

Disclosure 10 of 11

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: ASSOCIATED SECURITIES CORP

Allegations: CLIENT OF PLANNER IN OFFICE - IMPLEMENTED STOCK SALES WITH OTHER BROKERAGE FIRM CAUSING CAPITAL GAINS TAXES

Product Type: Equity Listed (Common & Preferred Stock)

Alleged Damages: \$13,000.00

Customer Complaint Information

Date Complaint Received: 10/22/1990



Complaint Pending? No
Status: Settled
Status Date: 07/12/1991
Settlement Amount: \$13,000.00
Individual Contribution Amount: \$5,000.00

Disclosure 11 of 11

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: ASSOCIATED SECURITIES CORP

Allegations: NEGLIGENT MISREPRESENTATION OF FACTS, BREACH OF FIDUCIARY DUTY AND NEGLIGENCE IN CONNECTION WITH THE PURCHASE OF VARIOUS PUBLIC LIMITED PARTNERSHIPS, MUTUAL FUNDS AND A SINGLE PREMIUM DEFERRED ANNUITY TOTALLING \$281,000.

Product Type: Other
Other Product Type(s): LIMITED PARTNERSHIPS
MUTUAL FUNDS
ANNUITY

Alleged Damages: \$281,000.00

Customer Complaint Information

Date Complaint Received: 05/12/1992
Complaint Pending? No
Status: Litigation
Status Date: 02/02/1994
Settlement Amount:

Individual Contribution Amount:

Civil Litigation Information

Court Details: SUPERIOR; LOS ANGELES, CA; BC-055074
Date Notice/Process Served: 05/12/1992
Litigation Pending? No
Disposition: Settled
Disposition Date: 02/02/1994
Monetary Compensation Amount: \$40,000.00
Individual Contribution Amount: \$0.00

Broker Statement ALL DEFENDANTS CONTRIBUTED TO A GLOBAL SETTLEMENT FUND OF \$40,000, PLUS DEFENDANTS PAID COST OF MEDIATION. GARY BENSON WAS NAMED IN THE [CUSTOMER] CIVIL COMPLAINT IN A SUPERVISORY CAPACITY. BRUCE WRIGHT, A REPRESENTATIVE OF GARY BENSON'S FIRM,



WAS [CUSTOMER]'S ADVISOR. [CUSTOMER] LOST NO MONEY FROM INVESTMENTS SHE INVESTED WITH BRUCE WRIGHT. BECAUSE [CUSTOMER] LOST OVER \$600,000 IN GOLD AND COMMODITY INVESTMENTS WHICH WERE DONE THROUGH SOMEONE ELSE AT A DIFFERENT FIRM, AND BRUCE WRIGHT, WHO LEFT THE BUSINESS, COULD NOT BE LOCATED, SHE FILED THE COMPLAINT AGAINST GARY BENSON HIS FIRM, AND BROKER DEALER. THIS COMPLAINT AS DISMISSED WITH PREJUDICE.



End of Report

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