



IAPD Report

PATRICIA CAROL THOM

CRD# 1192935

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Qualifications	2 - 4
Registration and Employment History	5 - 6
Disclosure Information	7



When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

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

PATRICIA CAROL THOM (CRD# 1192935)

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 **02/06/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	INDEPENDENT FINANCIAL GROUP, LLC	CRD# 7717	09/15/2017
IA	INDEPENDENT FINANCIAL GROUP, LLC	CRD# 7717	09/15/2017

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **14** 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	THE THOM GROUP	122968	SAN LUIS OBISPO, CA	01/21/2003 - 11/15/2017
IA	FIRST ALLIED ADVISORY SERVICES, INC.	137888	SAN LUIS OBISPO, CA	07/02/2012 - 09/21/2017
B	FIRST ALLIED SECURITIES, INC.	32444	SAN LUIS OBISPO, CA	06/13/2005 - 09/21/2017

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	12
Termination	1



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 **14** 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	09/15/2017
B	FINRA	General Securities Representative	Approved	09/15/2017
B	FINRA	Operations Professional	Approved	09/15/2017
B	Arizona	Agent	Approved	09/15/2017
B	California	Agent	Approved	09/15/2017
IA	California	Investment Adviser Representative	Approved	09/15/2017
B	Colorado	Agent	Approved	02/26/2021
B	Florida	Agent	Approved	11/09/2020
B	Idaho	Agent	Approved	04/05/2019
B	Illinois	Agent	Approved	02/10/2026
B	Kentucky	Agent	Approved	11/17/2021
B	Nevada	Agent	Approved	09/28/2017
B	New York	Agent	Approved	09/15/2017



Qualifications

Regulator	Registration	Status	Date
B Oklahoma	Agent	Approved	09/19/2017
B Oregon	Agent	Approved	09/19/2017
B Pennsylvania	Agent	Approved	09/20/2017
B Texas	Agent	Approved	08/26/2021
IA Texas	Investment Adviser Representative	Restricted Approval	08/26/2021
B Washington	Agent	Approved	09/22/2017

Branch Office Locations

INDEPENDENT FINANCIAL GROUP, LLC
1880 SANTA BARBARA AVENUE
SUITE 220
SAN LUIS OBISPO, CA 93401




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, 3 general industry/product exams, and 1 state securities law exam.


Principal/Supervisory Exams

	Exam	Category	Date
	General Securities Principal Examination (S24)	Series 24	05/10/2002

General Industry/Product Exams

	Exam	Category	Date
	Operations Professional Examination (S99TO)	Series 99TO	01/02/2023
	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
	General Securities Representative Examination (S7)	Series 7	10/15/1983

State Securities Law Exams

	Exam	Category	Date
	Uniform Securities Agent State Law Examination (S63)	Series 63	04/11/1984

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	01/21/2003 - 11/15/2017	THE THOM GROUP	CRD# 122968	SAN LUIS OBISPO, CA
IA	07/02/2012 - 09/21/2017	FIRST ALLIED ADVISORY SERVICES, INC.	CRD# 137888	SAN LUIS OBISPO, CA
B	06/13/2005 - 09/21/2017	FIRST ALLIED SECURITIES, INC.	CRD# 32444	SAN LUIS OBISPO, CA
IA	07/11/2005 - 07/02/2012	FIRST ALLIED SECURITIES, INC.	CRD# 32444	SAN LUIS OBISPO, CA
B	01/29/2001 - 06/13/2005	ROUND HILL SECURITIES, INC.	CRD# 35223	ALAMO, CA
B	06/29/1995 - 01/12/2001	SUTRO & CO. INCORPORATED	CRD# 801	SAN FRANCISCO, CA
B	09/04/1990 - 07/05/1995	EVEREN SECURITIES, INC.	CRD# 19616	ST. LOUIS, MO
B	10/19/1983 - 09/04/1990	BATEMAN EICHLER, HILL RICHARDS, INCORPORATED	CRD# 76	

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
09/2017 - Present	INDEPENDENT FINANCIAL GROUP	REGISTERED REP	Y	SAN LUIS OBISPO, CA, United States
02/2001 - Present	THE THOM GROUP	PRESIDENT	Y	SAN LUIS OBISPO, CA, United States
07/2012 - 09/2017	FIRST ALLIED ADVISORY SERVICES, INC.	MASS TRANSFER - INVESTMENT ADVISOR REPRESENTATIVE	Y	CHESTERFIELD, MO, United States
06/2005 - 09/2017	FIRST ALLIED SECURITIES, INC.	Mass Transfer	Y	SAN DIEGO, CA, United States



Registration & Employment History



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) THE THOM GROUP

POSITION: Officer/Director NATURE: DBA Name for Marketing Purposes Only INVESTMENT RELATED: No NUMBER OF HOURS: 40 SECURITIES TRADING HOURS: 40 START DATE: 02/01/2001

ADDRESS: 1880 Santa Barbara Avenue, Suite 220, San Luis Obispo CA 93401, United States

DESCRIPTION: Financial Advisor



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	12
Termination	1

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 12

Reporting Source: Individual

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

Allegations: INVESTMENT WAS RECOMMENDED IN SEPTEMBER 2006. CLAIMANT ALLEGES UNSUITABLE RECOMMENDATION; BREACH OF FIDUCIARY DUTY; COMMON LAW FRAUD; BREACH OF CONTRACT; NEGLIGENT SUPERVISION; SALE OF UNREGISTERED SECURITIES; AND VIOLATION OF THE CALIFORNIA SECURITIES ACT.

Product Type: Other: TENANTS IN COMMON

Alleged Damages: \$535,000.00

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 #: 14-03728

Filing date of arbitration/CFTC reparation or civil litigation: 12/10/2014

Customer Complaint Information



Date Complaint Received: 12/31/2014

Complaint Pending? No

Status: Settled

Status Date: 03/14/2016

Settlement Amount: \$50,000.00

Individual Contribution Amount: \$0.00

Broker Statement

CLAIMANT WAS NOT AN EXISTING CLIENT. HE APPROACHED ME ON OR ABOUT JULY 31, 2006 ON A ONE-TIME BASIS TO FACILITATE AN IRC SECTION 1031 EXCHANGE FOR A PROPERTY HE HAD ALREADY SOLD THAT WAS CLOSING TWO TO THREE WEEKS LATER. CLAIMANT WAS A SOPHISTICATED INVESTOR WITH OVER \$3 MILLION IN REAL ESTATE INVESTMENTS. THE SUBJECT PROPERTY WAS ON FIRST ALLIED'S "APPROVED" 1031 EXCHANGE LIST. PRIOR TO THE SUBJECT INVESTMENT, CLAIMANT ACKNOWLEDGED IN WRITING: (1) THAT HE WAS AN "ACCREDITED INVESTOR" UNDER RULE 501(A) OF REGULATION D; (2) THAT HE HAD BEEN PROVIDED COPIES OF ALL RELEVANT INVESTMENT DOCUMENTS, INCLUDING THE CONFIDENTIAL PRIVATE PLACEMENT MEMORANDUM ("INVESTMENT DOCUMENTS") REGARDING THE SUBJECT INVESTMENT; (3) THAT HE UNDERSTOOD THAT THE INVESTMENT WAS "HIGHLY SPECULATIVE," AND INVOLVED "SUBSTANTIAL INVESTMENT AND TAX RISKS" INCLUDING LOSS OF ENTIRE INVESTMENT. THIS INVESTMENT DID NOT "OVER CONCENTRATE" CLIENT BECAUSE HIS OTHER REAL ESTATE INVESTMENTS WERE NOT SIMILAR, AS HIS OTHER HOLDINGS WERE NOT LIMITED PARTNERSHIPS. I DENY THE ALLEGATIONS AND ANY ADMISSION OF LIABILITY. I STAND BY MY ORIGINAL DECISION OF SUGGESTING THIS INVESTMENT WITH THE INFORMATION I WAS PROVIDED BY BROKER DEALER.

Disclosure 2 of 12

Reporting Source: Individual

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

Allegations: CLIENT ALLEGES THAT SEVERAL STRUCTURED NOTE PURCHASES WERE UNSUITABLE FOR HER, AND THAT SHE WAS NOT MADE AWARE OF THE ASSOCIATED RISKS FROM MARCH 2011 TO MARCH 2012.

Product Type: Other: STRUCTURED NOTES

Alleged Damages: \$73,822.71

Alleged Damages Amount Explanation (if amount not exact): THIS AMOUNT REPRESENTS THE FIRM'S ESTIMATED TOTAL LOSS FOR THE 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: 02/29/2012
Complaint Pending? No
Status: Settled
Status Date: 04/16/2012
Settlement Amount: \$62,503.00
Individual Contribution Amount: \$10,000.00
Broker Statement APPLICANT DENIES THE ALLEGATIONS AND ASSERTS THAT THE SECURITIES WERE SUITABLE AND THE FEATURES AND RISKS WERE ADEQUATELY DISCLOSED.

Disclosure 3 of 12

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: ROUND HILL SECURITIES, INC.
Allegations: MISREPRESENTATION, OCTOBER, 2002 - MARCH, 2005.
Product Type: Other
Other Product Type(s): VARIABLE LIFE FUND
Alleged Damages: \$20,000.00

Customer Complaint Information

Date Complaint Received: 10/14/2005
Complaint Pending? No
Status: Denied
Status Date: 10/21/2005
Settlement Amount:
Individual Contribution Amount:

Disclosure 4 of 12

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: SUTRO & CO.
Allegations: ALLEGATIONS OF UNSUITABLE FUND RECOMENDATIONS AND UNAUTHORIZED TRADING IN THE ACCOUNT OF THE COMPLIANT'S MOTHER. DAMAGES UNSPECIFIED BUT BELIEVED TO BE IN EXCESS OF \$5,000.00.
Product Type: Mutual Fund(s)
Alleged Damages: \$5,000.00

Customer Complaint Information

Date Complaint Received: 05/15/2002



Complaint Pending? No
Status: Settled
Status Date: 01/25/2003
Settlement Amount: \$23,500.00
Individual Contribution Amount: \$0.00

.....

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: SUTRO & CO.

Allegations: INFORMATION PROVIDED IN U-5 AMENDMENT BY SUTRO, "ALLEGATIONS OF UNSUITABLE FUND RECOMMENDATIONS AND UNAUTHORIZED TRADING IN THE ACCOUNT OF THE COMPLAINT'S MOTHER. DAMAGES UNSPECIFIED BY BELIEVED TO BE IN EXCESS OF \$5,000.00

Product Type: Mutual Fund(s)
Alleged Damages: \$5,000.00

Customer Complaint Information

Date Complaint Received: 05/15/2002
Complaint Pending? No
Status: Settled
Status Date: 01/25/2003
Settlement Amount: \$23,500.00
Individual Contribution Amount: \$0.00

Broker Statement REP'S STATEMENT: "CLIENT WAS UNABLE TO DRIVE SO HER DAUGHTER WAS WITH HER FOR EVERY APPOINTMENT. NO TRADING WAS DONE ON THE PHONE, ONLY IN PERSON. SHE DIED TWO YEARS AGO AFTER I LEFT SUTRO, SO I DON'T KNOW WHO HANDLED THE ACCOUNT."

Disclosure 5 of 12

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: SUTRO & CO. INCORPORATED

Allegations: CLIENT ALLEGES CAROL THOM MADE UNSUITABLE AND UNAUTHORIZED TRADES IN HER ACCOUNTS SINCE 2000, WHEN SHE RETIRED.

Product Type: Mutual Fund(s)
Alleged Damages: \$51,686.00

Customer Complaint Information

Date Complaint Received: 02/21/2003
Complaint Pending? No



Status: Denied
Status Date: 04/23/2004

Settlement Amount:

Individual Contribution Amount:
.....

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: SUTRO & CO. INCORORATED (RBC DAIN RAUSCHER)

Allegations: PER U-5 FILED BY SUTRO, "CLIENT ALLEGES MS. THOM MADE UNSUITABLE AND UNAUTHORIZED TRADES IN HER ACCOUNTS."

Product Type: Mutual Fund(s)

Other Product Type(s): EQUITY-OTC

Alleged Damages: \$51,686.00

Customer Complaint Information

Date Complaint Received: 02/21/2003

Complaint Pending? No

Status: Denied

Status Date: 04/23/2004

Settlement Amount:

Individual Contribution Amount:

Disclosure 6 of 12

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: SUTRO AND CO., INC

Allegations: CLIENT ALLEGES MISREPRESENTATION IN PURCHASE OF NUVEEN, UIT. CLAMS SHE WAS NOT AWARE INVESTMENT WOULD MATURE IN 15 MONTHS, THIS RESULTED IN LOSS.

Product Type: Unit Investment Trust(s)

Alleged Damages: \$6,000.00

Customer Complaint Information

Date Complaint Received: 09/11/2002

Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:
.....



Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: SUTRO & CO. (RBC DAIN RAUSCHER)

Allegations: CLIENT ALLEGES MISREPRESENTATION IN PURCHASE OF NUVEEN UIT. CLAIMS SHE WAS NOT AWARE INVESTMENT WOULD MATURE IN 15 MONTH. THIS RESULTED IN A LOSS.

Product Type: Unit Investment Trust(s)

Alleged Damages: \$6,000.00

Customer Complaint Information

Date Complaint Received: 09/11/2002

Complaint Pending? No

Status: Denied

Status Date: 04/23/2004

Settlement Amount:

Individual Contribution Amount:

Disclosure 7 of 12

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: SUTRO & CO., INC.

Allegations: CLAIMANT ALLEGES UNSUITABLE TRADES, LACK OF SUPERVISION, BREACH OF CONTRACT, NEGLIGENCE, BREACH OF FIDUCIARY DUTY AND MISREPRESENTATION.

Product Type: Debt - Corporate

Alleged Damages: \$515,000.00

Customer Complaint Information

Date Complaint Received: 07/23/2001

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 07/23/2001

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD # 01-02973

Date Notice/Process Served: 07/23/2001

Arbitration Pending? No



Disposition: Settled
Disposition Date: 06/13/2002
Monetary Compensation Amount: \$278,000.00
Individual Contribution Amount: \$0.00

.....

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: SUTRO & CO., INC

Allegations: PER SUTRO & CO., INC. "CLAIMANT ALLEGES UNSUITABLE TRADES, LACK OF SUPERVISION, BREACH OF CONTRACT, NEGLIGENCE, BREACH OF FIDUCIARY DUTY AND MISREPRESENTATION."

Product Type: Debt - Corporate
Alleged Damages: \$515,000.00

Customer Complaint Information

Date Complaint Received: 07/23/2001
Complaint Pending? No
Status: Arbitration/Reparation
Status Date: 07/23/2001

Settlement Amount:
Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD #01-02973

Date Notice/Process Served: 07/23/2001
Arbitration Pending? No

Disposition: Settled
Disposition Date: 06/13/2002
Monetary Compensation Amount: \$278,000.00
Individual Contribution Amount: \$0.00

Disclosure 8 of 12

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: SUTRO & CO., INC.

Allegations: CUSTOMER ALLEGES UNSUITABILITY.



Product Type: Debt - Corporate

Other Product Type(s): MUTUAL FUND

Alleged Damages: \$58,000.00

Customer Complaint Information

Date Complaint Received: 08/13/2001

Complaint Pending? No

Status: Settled

Status Date: 12/27/2001

Settlement Amount: \$17,620.01

Individual Contribution Amount: \$0.00

Firm Statement THE MATTER HAS BEEN SETTLED.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: SUTRO & DO., INC.

Allegations: PER SUTRO & CO., INC. "CUSTOMER ALLEGES UNSUITABILITY"

Product Type: Debt - Corporate

Other Product Type(s): MUTUAL FUND

Alleged Damages: \$58,000.00

Customer Complaint Information

Date Complaint Received: 08/13/2001

Complaint Pending? No

Status: Settled

Status Date: 12/27/2001

Settlement Amount: \$17,620.01

Individual Contribution Amount: \$0.00

Disclosure 9 of 12

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: SUTRO & CO., INC.

Allegations: ORAL COMPLAINT ALLEGING UNSUITABLE TRADING AND TRADING WITHOUT AUTHORIZATION.

Product Type: Debt - Corporate

Other Product Type(s): EQUITIES IN ADDITION TO CORPORATE BONDS.

Alleged Damages: \$100,000.00

**Customer Complaint Information**

Date Complaint Received: 01/05/2001
Complaint Pending? No
Status: Settled
Status Date: 06/06/2001
Settlement Amount: \$35,016.62
Individual Contribution Amount: \$0.00
Firm Statement COMPLAINT WAS SETTLED FOR \$35,016.62

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: SUTRO & CO., INC.
Allegations: PER SUTRO, "ORAL COMPLAINT ALLEGING UNSUITABLE TRADING AND TRADING WITHOUT AUTHORIZATION."
Product Type: Debt - Corporate
Other Product Type(s): EQUITIES IN ADDITION TO CORPORATE BONDS.
Alleged Damages: \$100,000.00

Customer Complaint Information

Date Complaint Received: 01/05/2001
Complaint Pending? No
Status: Settled
Status Date: 06/06/2001
Settlement Amount: \$35,016.62
Individual Contribution Amount: \$0.00

Broker Statement REP STATEMENT: "[CUSTOMER] AUTHORIZED ALL TRADES IN HIS ACCOUNT AND NEVER EXPRESSED ANY DISSATISFACTION WITH SAME. HE ALSO STATED IN WRITING THAT HE WAS SATISFIED WITH THE SERVICES PROVIDE BY THOM AND THAT ALL INVESTMENTS AND THE LEVEL OF ACTIVITY IN THE ACCOUNT OF THE ELKS LODGE 1538, IN WHICH [CUSTOMER] WAS THE CHAIRMAN OF THE BOARD OF TRUSTEES AND A MEMBER OF ITS 7-PERSON INVESTMENT COMMITTEE, AND WHICH TRACKED [CUSTOMER'S] INVESTMENTS, WERE CONSISTEND WITH THE ELKS' INVESTMENT OBJECTIVES."

Disclosure 10 of 12

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: SUTRO & CO. INCORPORATED
Allegations: CLAIMANT ALLEGES UNSUITABLE TRADING, BREACH OF CONTRACT,



NEGLIEGENCE, AND FRAUD.

Product Type: Other: BONDS

Alleged Damages: \$239,000.00

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:** NASD

Docket/Case #: #01-02300

**Filing date of
arbitration/CFTC reparation
or civil litigation:** 05/15/2001

Customer Complaint Information

Date Complaint Received: 05/15/2001

Complaint Pending? No

Status: Settled

Status Date: 07/31/2004

Settlement Amount: \$50,000.00

**Individual Contribution
Amount:** \$10,000.00

Arbitration Information

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

Docket/Case #: #01-02300

Date Notice/Process Served: 05/15/2001

Arbitration Pending? No

Disposition: Settled

Disposition Date: 07/31/2004

**Monetary Compensation
Amount:** \$50,000.00

**Individual Contribution
Amount:** \$10,000.00

Firm Statement MATTER IS PENDING.

Reporting Source: Individual

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

Allegations: CLAIMANT ALLEGES UNSUITABLE TRADING, BREACH OF CONTRACT,



NEGLIGENCE AND FRAUD.

Product Type: Other: BONDS**Alleged Damages:** \$239,000.00**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:** NASD**Docket/Case #:** 01-02300**Filing date of
arbitration/CFTC reparation
or civil litigation:** 05/15/2001**Customer Complaint Information****Date Complaint Received:** 05/15/2001**Complaint Pending?** No**Status:** Settled**Status Date:** 07/31/2004**Settlement Amount:** \$50,000.00**Individual Contribution
Amount:** \$10,000.00**Arbitration Information****Disposition:** Settled**Disposition Date:** 07/31/2004**Disclosure 11 of 12****Reporting Source:** Firm**Employing firm when
activities occurred which led
to the complaint:** SUTRO & CO.**Allegations:** ORAL COMPLAINT ALLEGING INVESTMENT IN JOHN HANCOCK
TECHNOLOGY FUND WAS NOT SUITABLE.**Product Type:** Mutual Fund(s)**Alleged Damages:** \$12,970.00**Customer Complaint Information****Date Complaint Received:** 01/12/2001**Complaint Pending?** No**Status:** Settled**Status Date:** 02/02/2001**Settlement Amount:** \$12,970.00



Individual Contribution Amount: \$0.00

Firm Statement SETTLED 2/2/01 FOR \$12,970.00

.....

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: SUTRO & CO

Allegations: ORAL COMPLAINT ALLEGING INVESTMENT IN JOHN HANCOCK TECHNOLOGY FUND WAS NOT SUITABLE.

Product Type: Mutual Fund(s)

Alleged Damages: \$12,970.00

Customer Complaint Information

Date Complaint Received: 01/12/2001

Complaint Pending? No

Status: Settled

Status Date: 02/02/2001

Settlement Amount: \$12,970.00

Individual Contribution Amount: \$0.00

Broker Statement REP STATEMENT: [CUSTOMER] ESTABLISHED HER ACCOUNT SEVERAL YEARS AGO. SHE WANTED TO PARTICIPATE IN THE MARKET AT THE TIME. THE TECH FUNDS WERE IN FAVOR. SHE WAS ORIGINALLY IN THE J.H. SOVERIGN FUND WHICH WAS A VERY CONSERVATIVE FUND. SHE SWITCHED TO THE TECH FUND BECAUSE SHE FELT THE SOVERIGN FUND WAS NOT GIVING HER THE RETURN EVERYONE ELSE WAS RECEIVING. WE HAD CONSTANT CONTACT. I FEEL SHE FILED WHEN I WAS NO LONGER AT SUTRO AND FELT SHE COULDN'T CORRESPOND WITH ME ANY LONGER.

Disclosure 12 of 12

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: SUTRO & CO., INCORPORATED

Allegations: CUSTOMER'S DAUGHTER CLAIMS UNAUTHORIZED AND UNSUITABLE TRADING IN CORPORATE BONDS.

Product Type: Debt - Corporate

Other Product Type(s): CORPORATE BONDS

Alleged Damages: \$12,655.00

Customer Complaint Information

Date Complaint Received: 01/11/2000

Complaint Pending? No

Status: Denied



Status Date: 02/10/2000

Settlement Amount:

Individual Contribution Amount:

Broker Statement

THE CLIENT HAS NOT COMPLAINED NOR VERIFIED THE COMPLAINT. THE FIRM HAS VIGOROUSLY DENIED ALL CLAIMS.



Termination

This disclosure event involves a situation where the Investment Adviser Representative voluntarily resigned, was discharged or was permitted to resign after allegations were made that accused the Investment Adviser Representative of violating investment-related statutes, regulations, rules or industry standards of conduct; fraud or the wrongful taking of property; or failure to supervise in connection with investment-related statutes, regulations, rules or industry standards of conduct.

Disclosure 1 of 1

Reporting Source:	Individual
Firm Name:	SUTRO & CO.
Termination Type:	Permitted to Resign
Termination Date:	12/21/2000
Allegations:	UNDER INTERNAL REVIEW FOR VIOLATION OF FIRM POLICIES AND PROCEDURES WITH RESPECT TO THE USE OF DISCRETION IN CUSTOMER ACCOUNTS.
Product Type:	Other
Other Product Types:	
Broker Statement	THE COMPLIANCE OFFICER FELT I HAD TOO MUCH CONTROL OF MY CLIENTS. ALSO THE COMPANY DID NOT WANT ANNUITIES SOLD TO CLIENTS OVER FIFTY. HAD A PROBLEM WITH ANNUITIES IN QUALIFIED ACCOUNT AND 1035 EXCHANGES. NO CLIENT COMPLAINTS RECEIVED. OTHER ANNUITIES A MAJOR PART OF MY BUSINESS. I COULD NOT AGREE TO WORK UNDER THOSE CONDITIONS, THEREFORE, I QUIT.



End of Report

This page is intentionally left blank.