



## IAPD Report

# JAMES KINGSLEY LOMBARDO

CRD# 1229340

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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

### JAMES KINGSLEY LOMBARDO (CRD# 1229340)

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 **05/27/2025**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
<b>B</b>	QUINT CAPITAL CORPORATION	CRD# 26586	01/03/2019
<b>IA</b>	QUINT CAPITAL MANAGEMENT	CRD# 26586	05/08/2019

### QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **5** 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
<b>IA</b>	PETERSEN INVESTMENTS, INC.	38537	BEDFORD, NY	10/11/2013 - 01/07/2019
<b>B</b>	PETERSEN INVESTMENTS, INC.	38537	BEDFORD, NY	03/14/2001 - 01/07/2019
<b>B</b>	GRUNTAL & CO., L.L.C.	372	NEW YORK, NY	05/23/1997 - 02/08/2001

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
Regulatory Event	2
Customer Dispute	17
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 5 jurisdiction(s) and 1 SRO(s) through his or her employer(s).

#### Employment 1 of 1

Firm Name: **QUINT CAPITAL MANAGEMENT**

Main Address: 230 PARK AVE - 361W  
NEW YORK, NY 10169

Firm ID#: 26586

Regulator	Registration	Status	Date
<b>B</b> FINRA	General Securities Representative	Approved	01/03/2019
<b>B</b> FINRA	Operations Professional	Approved	01/03/2019
<b>B</b> FINRA	Municipal Securities Representative	Approved	02/15/2019
<b>B</b> California	Agent	Approved	01/04/2019
<b>B</b> Connecticut	Agent	Approved	01/15/2019
<b>B</b> Florida	Agent	Approved	05/08/2019
<b>IA</b> Florida	Investment Adviser Representative	Approved	05/08/2019
<b>B</b> New Jersey	Agent	Approved	03/01/2019
<b>B</b> New York	Agent	Approved	01/03/2019
<b>IA</b> New York	Investment Adviser Representative	Approved	03/18/2022

#### Branch Office Locations

**QUINT CAPITAL MANAGEMENT**

Sarasota, FL



## 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, 4 general industry/product exams, and 2 state securities law exams.**

#### Principal/Supervisory Exams

Exam	Category	Date
 General Securities Sales Supervisor Examination (Options Module & General Module) (S8)	Series 8	08/05/1987

#### 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	08/18/1984
 Municipal Securities Representative Examination (S52)	Series 52	01/13/1984

#### State Securities Law Exams

Exam	Category	Date
 Uniform Investment Adviser Law Examination (S65)	Series 65	04/13/2004
 Uniform Securities Agent State Law Examination (S63)	Series 63	03/16/1984

### 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	10/11/2013 - 01/07/2019	PETERSEN INVESTMENTS, INC.	CRD# 38537	BEDFORD, NY
B	03/14/2001 - 01/07/2019	PETERSEN INVESTMENTS, INC.	CRD# 38537	BEDFORD, NY
B	05/23/1997 - 02/08/2001	GRUNTAL & CO., L.L.C.	CRD# 372	NEW YORK, NY
B	02/14/1990 - 04/29/1997	A. G. EDWARDS & SONS, INC.	CRD# 4	ST. LOUIS, MO
B	02/07/1990 - 03/01/1990	JESUP & LAMONT, INCORPORATED	CRD# 3144	
B	03/15/1989 - 01/30/1990	J. T. MORAN & CO., INC.	CRD# 15655	
B	01/02/1990 - 01/27/1990	HANIFEN, IMHOFF SECURITIES CORP.	CRD# 10620	
B	12/12/1989 - 01/02/1990	MOORE & SCHLEY, CAMERON & CO.	CRD# 6917	
B	03/13/1984 - 04/13/1989	MCLAUGHLIN, PIVEN, VOGEL INC.	CRD# 7404	
B	01/16/1984 - 03/14/1984	M V SECURITIES, INC. INC.	CRD# 7201	

### 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
01/2019 - Present	Quint Capital Corporation	Registered Representative	Y	New York, NY, United States
03/2001 - 01/2019	Petersen Investment	Registered Representative	Y	Wall, NJ, 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.

No information reported.



## 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
Regulatory Event	2
Customer Dispute	17
Termination	1

### Regulatory Event

This disclosure event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a federal regulator such as the Securities and Exchange Commission or the Commodities Futures Trading Commission, or a foreign financial regulatory body) for a violation of investment-related rules or regulations. This disclosure event may also include a revocation or suspension of an Investment Adviser Representative's authority to act as an attorney, accountant or federal contractor.

#### Disclosure 1 of 2

<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	ILLINOIS SECURITIES DEPARTMENT
<b>Sanction(s) Sought:</b>	Denial
<b>Other Sanction(s) Sought:</b>	
<b>Date Initiated:</b>	08/27/2001
<b>Docket/Case Number:</b>	0100401
<b>Employing firm when activity occurred which led to the regulatory action:</b>	PETERSON INVESTMENTS, INC.
<b>Product Type:</b>	No Product
<b>Other Product Type(s):</b>	
<b>Allegations:</b>	RESPONDENT'S APPLICATION AS A SALESPERSON IS SUBJECT TO DENIAL PURSUANT TO AN NYSE ACCEPTED STIPULATION OF FACTS AND CONSENT TO PENALTY, FILE NO. 00-190.
<b>Current Status:</b>	Final
<b>Resolution:</b>	Consent
<b>Resolution Date:</b>	12/13/2001
<b>Sanctions Ordered:</b>	
<b>Other Sanctions Ordered:</b>	WITHDRAWAL



<b>Sanction Details:</b>	THE RESPONDENT SHALL CAUSE TO HAVE HIS APPLICATION FOR REGISTRATION AS A SALESPERSON IN ILLINOIS WITHDRAWN WITHIN THREE DAYS FROM ENTRY OF THIS CONSENT ORDER AND WILL NOT REAPPLY FOR A PERIOD OF TWO YEARS FROM THIS CONSENT ORDER.
<b>Regulator Statement</b>	A SUMMARY ORDER OF DENIAL, ISSUED AUGUST 27, 2001. THE RESPONDENT HAS THIRTY DAYS FROM ENTRY OF THIS SUMMARY ORDER IN WHICH TO REQUEST A HEARING, IF NO SUCH REQUEST IS MADE WITHIN THAT TIME PERIOD, THE SUMMARY ORDER WILL BECOME FINAL. A NOTICE OF HEARING, ISSUED OCTOBER 18, 2001. THE HEARING WILL BE HELD ON DECEMBER 12, 2001. A CONSENT ORDER OF WITHDRAWAL ISSUED DECEMBER 13, 2001. CONTACT: (217) 785-4948
<b>Reporting Source:</b>	Individual
<b>Regulatory Action Initiated By:</b>	ILLINOIS SECURITIES DEPARTMENT
<b>Sanction(s) Sought:</b>	Denial
<b>Other Sanction(s) Sought:</b>	
<b>Date Initiated:</b>	08/27/2001
<b>Docket/Case Number:</b>	0100401
<b>Employing firm when activity occurred which led to the regulatory action:</b>	PETERSEN INVESTMENTS, INC.
<b>Product Type:</b>	No Product
<b>Other Product Type(s):</b>	
<b>Allegations:</b>	RESPONDENTS APPLICATION AS A SALESPERSON IS SUBJECT TO DENIAL PURSUANT TO AN NYSE ACCEPTED STIPULATION OF FACTS AND CONSENT TO PENALTY, FILE NUMBER 00-190
<b>Current Status:</b>	Final
<b>Resolution:</b>	Consent
<b>Resolution Date:</b>	12/13/2001
<b>Sanctions Ordered:</b>	
<b>Other Sanctions Ordered:</b>	WITHDRAWAL
<b>Sanction Details:</b>	THE RESPONDENT SHALL CAUSE TO HAVE HIS APPLICATION FOR REGISTRATION AS A SALESPERSON IN ILLINOIS WITHDRAWN WITHIN THREE DAYS FROM ENTRY OF THIS CONSENT ORDER AND WILL NOT REAPPLY FOR A PERIOD OF TWO YEARS FROM THIS CONSENT ORDER.
<b>Broker Statement</b>	A SUMMARY ORDER OF DENIAL, ISSUED AUGUST 27, 2001. THE RESPONDENT HAS THIRTY DAYS FROM ENTRY OF THIS SUMMARY ORDER IN WHICH TO REQUEST A HEARING, IF NO SUCH REQUEST IS MADE WITHIN THAT TIME PERIOD, THE SUMMARY ORDER WILL BECOME FINAL. A NOTICE OF HEARING, ISSUED OCTOBER 18, 2001. THE HEARING WILL BE HELD ON DECEMBER 12, 2001. A CONSENT ORDER OF WITHDRAWAL ISSUED DECEMBER 13, 2001. CONTACT: (217) 785-4948

## Disclosure 2 of 2



<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	NYSE DIVISION OF ENFORCEMENT
<b>Sanction(s) Sought:</b>	
<b>Other Sanction(s) Sought:</b>	
<b>Date Initiated:</b>	09/29/2000
<b>Docket/Case Number:</b>	HPD# 00-190
<b>Employing firm when activity occurred which led to the regulatory action:</b>	
<b>Product Type:</b>	Other
<b>Other Product Type(s):</b>	
<b>Allegations:</b>	**09/29/2000** STIPULATION AND CONSENT TO PENALTY FILED BY NYSE DIVISION OF ENFORCEMENT AND PENDING. WITHOUT ADMITTING OR DENYING GUILT, LOMBARDO CONSENTS TO: A. FINDINGS BY THE HEARING PANEL THAT HE ENGAGED IN CONDUCT INCONSISTENT WITH JUST AND EQUITABLE PRINCIPLES OF TRADE IN THAT, ON CERTAIN OCCASIONS, HE: (1) MADE RECOMMENDATIONS TO PURCHASE A BOND IN CERTAIN CUSTOMER ACCOUNTS OF HIS MEMBER ORGANIZATION EMPLOYER THAT WAS UNSUITABLE IN VIEW OF THE CUSTOMERS? INVESTMENT OBJECTIVES, INVESTMENT EXPERIENCE AND FINANCIAL RESOURCES; AND (2) FAILED TO DISCLOSE INFORMATION TO SUCH CUSTOMERS OF HIS MEMBER ORGANIZATION EMPLOYER CONCERNING THE CURRENT MARKET VALUE FOR SUCH BOND WHILE AT OR ABOUT THE SAME TIME SELLING SUCH BOND IN HIS PERSONAL AND FAMILY-RELATED ACCOUNTS AFTER THE PRICE BEGAN TO DECLINE. B. THE IMPOSITION BY THE EXCHANGE OF THE PENALTY OF A CENSURE AND A SUSPENSION FOR A PERIOD OF TWO MONTHS FROM MEMBERSHIP, ALLIED MEMBERSHIP, APPROVED PERSON STATUS, AND FROM EMPLOYMENT OR ASSOCIATION IN ANY CAPACITY WITH ANY MEMBER OR MEMBER ORGANIZATION.
<b>Current Status:</b>	Final
<b>Resolution:</b>	Decision
<b>Resolution Date:</b>	12/08/2000
<b>Sanctions Ordered:</b>	Censure Suspension
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	**11/07/2000** DECISION 00-190 ISSUED BY NEW YORK STOCK EXCHANGE, INC. HEARING PANEL. DECISION: MADE PURCHASE RECOMMENDATIONS THAT WERE UNSUITABLE AND FAILED TO DISCLOSE INFORMATION TO CUSTOMERS - CONSENT TO CENSURE AND TWO MONTH SUSPENSION.
<b>Regulator Statement</b>	**12/08/2000** THE DECISION IS NOW FINAL. THE BAR OR SUSPENSION IMPOSED IS EFFECTIVE AND WILL COMMENCE DECEMBER 5, 2000. CONTACT: PEGGY GERMINO (212) 656-8450.
<b>Reporting Source:</b>	Individual
<b>Regulatory Action Initiated By:</b>	NYSE



<b>Sanction(s) Sought:</b>	Suspension
<b>Other Sanction(s) Sought:</b>	CENSURE
<b>Date Initiated:</b>	12/01/1997
<b>Docket/Case Number:</b>	
<b>Employing firm when activity occurred which led to the regulatory action:</b>	A.G. EDWARDS
<b>Product Type:</b>	Debt - Corporate
<b>Other Product Type(s):</b>	
<b>Allegations:</b>	THE DIVISION OF ENFORCEMENT OF THE EXCHANGE HAS COMMENCED A FORMAL INVESTIGATION INTO ALLEGATIONS THAT WHILE MR. LOMBARDO WAS EMPLOYED BY A.G. EDWARDS & SONS, INC., HE MAY HAVE ENGAGED IN MISCONDUCT IN THE ACCOUNTS OF CERTAIN CUSTOMERS. THE ALLEGED MISCONDUCT CONCERNED TRANSACTIONS IN PENN TRAFFIC CO. SR SUBORDINATED NOTES.
<b>Current Status:</b>	Final
<b>Resolution:</b>	Consent
<b>Resolution Date:</b>	11/07/2000
<b>Sanctions Ordered:</b>	Censure Suspension
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	MR. LOMBARDO WAS SUSPENDED FOR TWO MONTHS, THE SUSPENSION WILL BEGIN ON 12/05/2000.
<b>Broker Statement</b>	THE PANEL FOUND THAT MR. LOMBARDO'S RECOMMENDATIONS TO PURCHASE THE BONDS IN SUCH LARGE AND CONCENTRATED POSITIONS WAS UNSUITABLE IN VIEW OF THE CUSTOMERS' INVESTMENT EXPERIENCE, INVESTMENT OBJECTIVES AND FINANCIAL RESOURCES. MR. LOMBARDO FAILED TO DISCLOSE TO THESE CUSTOMERS THE DECLINING PRICE OF THE BONDS, WHILE SELLING THE BONDS IN HIS PERSONAL AND FAMILY-RELATED ACCOUNTS. THE HEARING PANEL IMPOSED THE PENALTY, CONSENTED TO BY MR. LOMBARDO OF A CENSURE AND A SUSPENSION FOR A PERIOD OF TWO MONTHS FROM MEMBERSHIP, ALLIED MEMBERSHIP, APPROVED PERSON STATUS AND FROM EMPLOYMENT OR ASSOCIATION IN ANY CAPACITY WITH ANY MEMBER OR MEMBER ORGANIZATION.



## 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 17

**Reporting Source:** Firm  
**Employing firm when activities occurred which led to the complaint:** GRUNTAL & CO., L.L.C.  
**Allegations:** IN A VERBAL COMPLAINT LODGED WITH GRUNTAL & CO., L.L.C. ON JANUARY 29, 2001, THE CLIENT COMPLAINED ABOUT THE PERFORMANCE OF INVESTMENTS THAT HE MADE IN GENEVA STEEL 11.125%, GLOBAL STAR 11.125% AND BRAZOS SPORTSWEAR 10.5% BONDS AT THE RECOMMENDATION OF FORMER GRUNTAL ACCOUNT EXECUTIVE ROBERT LEFKOWITZ. THE CLIENT ALSO ALLEGED THAT FORMER GRUNTAL ACCOUNT EXECUTIVE JAMES LOMBARDO MISREPRESENTED THE YIELD THAT HE WOULD RECEIVE ON GLOBAL STAR 11.5% BONDS WHEN HE RECOMMENDED THAT HE PURCHASE THE BONDS IN HIS GRUNTAL ACCOUNT.

**Product Type:** Debt - Corporate  
**Alleged Damages:** \$0.00

## Customer Complaint Information

**Date Complaint Received:** 01/29/2001  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:** 01/11/2002  
**Settlement Amount:** \$20,000.00  
**Individual Contribution Amount:** \$0.00  
**Firm Statement** ON JANUARY 11, 2002, GRUNTAL SETTLED THE COMPLAINT WITHOUT ADMITTING OR CONCEDING ANY LIABILITY AND DUE TO THE UNCERTAINTY AND COST OF POTENTIAL LITIGATION. PURSUANT TO THE TERMS OF THE SETTLEMENT AGREEMENT, GRUNTAL PAID THE CLIENT \$20,000. NEITHER MR. LEFKOWITZ NOR MR. LOMBARDO CONTRIBUTED TO THE SETTLEMENT.

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**Reporting Source:** Individual  
**Employing firm when activities occurred which led to the complaint:** GRUNTAL & CO. LLC  
**Allegations:** IN A VERBAL COMPLAINT LODGED WITH GRUNTAL & CO ON JANUARY 29, 2001, THE CLIENT COMPLAINED ABOUT THE PERFORMANCE OF THE INVESTMENTS THAT HE MADE SEVERAL CORPORATE BONDS. HE ALLEGED THAT LOMBARDO MISREPRESENTED THE YIELD ON THESE



INSTRUMENTS.

**Product Type:** Debt - Corporate

**Alleged Damages:** \$0.00

### Customer Complaint Information

**Date Complaint Received:** 01/29/2001

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 01/11/2002

**Settlement Amount:** \$20,000.00

**Individual Contribution Amount:** \$0.00

**Broker Statement** GRUNTAL SETTLED THE COMPLAINT WITHOUT ADMITTING OR CONCEDEING ANY LIABILITY AND DUE TO THE UNCERTAINTY AND COST OF LITIGATION. LOMBARDO MAINTAINS THAT ALL COMPLAINTS AROSE FROM THE PURCHASE OF RECOMMENDED BONDS

### Disclosure 2 of 17

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** GRUNTAL & CO., L.L.C.

**Allegations:** IN A VERBAL COMPLAINT LODGED WITH GRUNTAL & CO., L.L.C. ON JANUARY 22, 2001, THE CLIENT ALLEGED THAT FORMER GRUNTAL ACCOUNT EXECUTIVE JAMES LOMBARDO MISREPRESENTED THE YIELD THAT SHE WOULD RECEIVE ON GLOBAL STAR 11.5% BONDS WHEN HE RECOMMENDED THAT SHE PURCHASE THE BONDS IN HER GRUNTAL ACCOUNT. THE CLIENT ALLEGED THAT WHEN HER INVESTMENTS IN GENEVA STEEL 11.125% AND BRAZOS SPORTSWEAR 10.5% BONDS BEGAN TO DECLINE IN VALUE, FORMER GRUNTAL ACCOUNT EXECUTIVE ROBERT LEFKOWITZ\* ALLEGEDLY ASSURED HER THAT SHE WOULD RECEIVE AT LEAST 75% OF HER PRINCIPAL BACK AFTER THE ISSUERS COMPLETED A PLAN OF REORGANIZATION. \*DECEASED

**Product Type:** Debt - Corporate

**Alleged Damages:** \$90,000.00

### Customer Complaint Information

**Date Complaint Received:** 01/22/2001

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 10/10/2001

**Settlement Amount:** \$30,000.00

**Individual Contribution Amount:** \$0.00

**Firm Statement** ON OCTOBER 10, 2001, GRUNTAL AND THE CLIENT SETTLED THE COMPLAINT WITHOUT ADMITTING OR CONCEDING ANY LIABILITY AND DUE



TO THE UNCERTAINTY AND COST OF POTENTIAL LITIGATION. PURSUANT TO THE TERMS OF THE SETTLEMENT AGREEMENT, GRUNTAL PAID THE CLIENT \$30,000.00 NEITHER MR. LEFKOWITZ NOR MR. LOMBARDO CONTRIBUTE TO THE SETTLEMENT.

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**Reporting Source:** Individual  
**Employing firm when activities occurred which led to the complaint:** GRUNTAL & CO. LLC  
**Allegations:** I A VERBAL COMPLAINT LODGED WITH GRUNTAL & CO ON JAN 22, 2001 THE CLIENT ALLEGED THAT FORMER AE JAMES LOMBARDO MISREPRESENTED THE YIELD THAT SHE WOULD RECEIVE ON A BOND  
**Product Type:** Debt - Corporate  
**Alleged Damages:** \$90,000.00

### Customer Complaint Information

**Date Complaint Received:** 01/22/2001  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:** 10/10/2001  
**Settlement Amount:** \$30,000.00  
**Individual Contribution Amount:** \$0.00  
**Broker Statement** GRUNTAL SETTLED WITH OUT ADMITTING OR CONCEDING ANY LIABILITY, AND DUE TO THE UNCERTAINTY AND POTENTIAL COST OF LITIGATION. LOMBARDO MAINTAINS THAT ALL COMPLAINTS AROSE FROM THE PURCHASE OF FIRM RECOMMENDED BONDS

### Disclosure 3 of 17

**Reporting Source:** Firm  
**Employing firm when activities occurred which led to the complaint:** GRUNTAL & CO., L.L.C.  
**Allegations:** CLIENTS ALLEGUE THAT AE LOMBARDO RECOMMENDED UNSUITABLE CORPORATE BONDS. WHICH RESULTED IN LOSSES IN THEIR ACCOUNTS.  
**Product Type:** Other  
**Other Product Type(s):** CORPORATE BONDS  
**Alleged Damages:** \$81,000.00

### Customer Complaint Information

**Date Complaint Received:** 09/06/2001  
**Complaint Pending?** No  
**Status:** Denied  
**Status Date:** 02/08/2002  
**Settlement Amount:**

**Individual Contribution****Amount:**

**Firm Statement** THIS MATTER IS CLOSED. THE COMPLAINT HAS BEEN DENIED.

**Reporting Source:** Individual  
**Employing firm when activities occurred which led to the complaint:** GRUNTAL & CO. LLC.  
**Allegations:** CLIENTS ALLEGED THAT AE LOMBARDO RECOMMENDED UNSUITABLE CORPORATE BONDS, WHICH RESULTED IN LOSSES IN THEIR ACCOUNTS  
**Product Type:** Debt - Corporate  
**Alleged Damages:** \$81,000.00

**Customer Complaint Information**

**Date Complaint Received:** 09/06/2001  
**Complaint Pending?** No  
**Status:** Denied  
**Status Date:** 02/08/2002  
**Settlement Amount:** \$0.00  
**Individual Contribution Amount:** \$0.00  
**Broker Statement** THE MATTER IS CLOSED. THE COMPLAINT HAS BEEN DENIED IN ITS ENTIRETY. ALL COMPLAINTS ORIGINATED FROM MY PURCHASE OF A FIRM RECOMMENDED BOND FOR A NUMBER OF MY REGULAR FIXED INCOME ACCOUNTS. CLIENTS PURCHASED SIMILAR BONDS PREVIOUSLY AND THEREAFTER. I WAS IN REGULAR CONTACT WITH TRADER WHO MADE THE RECOMMENDATION AND THE ANALYST WHO FOLLOWED THE INVESTMENT FOR THE FIRM. EACH CALL TO THEM ELICITED A BUY OR HOLD RECOMMENDATION. AT NO TIME WAS A SELL RECOMMENDATION MADE.

**Disclosure 4 of 17**

**Reporting Source:** Firm  
**Employing firm when activities occurred which led to the complaint:** A.G. EDWARDS & SONS, INC.  
**Allegations:** ATTORNEY FOR CLIENTS ALLEGED UNSUITABLE INVESTMENT AND MISREPRESENTATION.  
**Product Type:** Debt - Corporate  
**Alleged Damages:** \$200,000.00

**Customer Complaint Information**

**Date Complaint Received:** 08/06/2001  
**Complaint Pending?** No  
**Status:** Settled



**Status Date:** 12/17/2001  
**Settlement Amount:** \$73,000.00  
**Individual Contribution Amount:** \$0.00

**Reporting Source:** Individual  
**Employing firm when activities occurred which led to the complaint:** A.G. EDWARDS & SONS  
**Allegations:** ATTORNEY FOR CLIENTS ALLEGED UNSUITABLE INVESTMENTS AND MISREPRESENTATION  
**Product Type:** Debt - Corporate  
**Alleged Damages:** \$200,000.00

### Customer Complaint Information

**Date Complaint Received:** 08/06/2001  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:** 12/17/2001  
**Settlement Amount:** \$73,000.00  
**Individual Contribution Amount:** \$0.00

### Disclosure 5 of 17

**Reporting Source:** Firm  
**Employing firm when activities occurred which led to the complaint:** A. G. EDWARDS & SONS, INC. AND GRUNTAL AND COMPANY, LLC  
**Allegations:** CLAIMANT ALLEGED FRAUDULENT CONDUCT; BREACH OF FIDUCIARY, CONTRACTUAL AND REGULATORY DUTIES IN RECOMMENDING UNSUITABLE SECURITIES; MISREPRESENTING AND OMISSION OF MATERIAL FACTS.  
**Product Type:** Equity Listed (Common & Preferred Stock)  
**Other Product Type(s):** EQUITY - OTC  
**Alleged Damages:** \$250,000.00

### Customer Complaint Information

**Date Complaint Received:** 04/09/2001  
**Complaint Pending?** No  
**Status:** Arbitration/Reparation  
**Status Date:** 04/09/2001  
**Settlement Amount:**  
**Individual Contribution Amount:**



## Arbitration Information

**Arbitration/Reparation Claim filed with and Docket/Case No.:** NASD #01-01467

**Date Notice/Process Served:** 04/09/2001

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 10/14/2002

**Monetary Compensation Amount:** \$21,089.89

**Individual Contribution Amount:** \$0.00

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**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** GRUNTAL & CO., L.L.C.

**Allegations:** CLAIMANT ALLEGES THAT MR. LOMBARDO RECOMMENDED AND OVER-CONCENTRATED HER ACCOUNT IN UNSUITABLE HIGH-YIELD SECURITIES. CLAIMANT ALSO ALLEGES THAT MR. LOMBARDO MISREPRESENTED THE RISKS OF THE INVESTMENTS.

**Product Type:** Debt - Corporate

**Alleged Damages:** \$250,000.00

## Customer Complaint Information

**Date Complaint Received:** 04/05/2001

**Complaint Pending?** No

**Status:** Arbitration/Reparation

**Status Date:** 04/05/2001

**Settlement Amount:**

**Individual Contribution Amount:**

## Arbitration Information

**Arbitration/Reparation Claim filed with and Docket/Case No.:** NASD CASE # 01-01467

**Date Notice/Process Served:** 04/05/2001

**Arbitration Pending?** Yes

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**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** GRUNTAL & CO., LLC

**Allegations:** CLAIMANT ALLEGES THAT MR. LOMBARDO RECOMMENDED AND OVER-



CONCENTRATED HER ACCOUNT IN UNSUITABLE HIGH-YIELD SECURITIES. CLAIMANT ALSO ALLEGES THAT MR. LOMBARDO MISREPRESENTED THE RISKS OF THE INVESTMENTS.

**Product Type:** Debt - Corporate

**Alleged Damages:** \$250,000.00

### Customer Complaint Information

**Date Complaint Received:** 04/05/2001

**Complaint Pending?** No

**Status:** Arbitration/Reparation

**Status Date:** 06/18/2001

**Settlement Amount:**

**Individual Contribution Amount:**

### Arbitration Information

**Arbitration/Reparation Claim filed with and Docket/Case No.:** NASD CASE # 01-01467

**Date Notice/Process Served:** 04/05/2001

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 10/14/2001

**Monetary Compensation Amount:** \$21,089.89

**Individual Contribution Amount:** \$0.00

**Broker Statement**

ALL COMPLIANTS ORIGINATED FROM MY PURCHASE OF A FIRM RECOMMENDED BOND FOR A NUMBER OF MY REGULAR FIXED INCOME CLIENTS. CLIENTS PURCHASED SIMILAR BOND PREVIOUSLY AND THEREAFTER. I WAS IN REGULAR CONTACT WITH THE TRADE WHO MADE THE RECOMMENDATION AND THE ANALYST WHO FOLLOWED THE INVESTMENT FOR THE FIRM. EACH CALL TO HIM ELICITED A OR HOLD RECOMMENDATION. AT NO TIME WAS A SELL RECOMMENDATION MADE.

### Disclosure 6 of 17

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** GRUNTAL & CO., L.L.C.

**Allegations:** THE CLIENT ALLEGES THAT GRUNTAL & CO., L.L.C. ACCOUNT EXECUTIVE JAMES LOMBARDO DID NOT INFORM HIM OF THE RISKS ASSOCIATED WITH INVESTMENT IN BRAZOS SPORTSWEAR 10.5%, GENEVA STEEL 11.125% CORPORATE BONDS AND INTERNATIONAL SEMITECH 11.5% DISCOUNT NOTES. THE CLIENT ALLEGES DAMAGES IN THE AMOUNT OF \$209,346.13

**Product Type:** Debt - Corporate

**Alleged Damages:** \$209,346.13



## Customer Complaint Information

**Date Complaint Received:** 08/15/2000  
**Complaint Pending?** No  
**Status:** Denied  
**Status Date:** 09/01/2000  
**Settlement Amount:** \$0.00  
**Individual Contribution Amount:** \$0.00  
**Broker Statement**  
GRUNTAL & CO., L.L.C. INVESTIGATED THE CLIENT'S ALLEGATIONS AND DETERMINED THAT THEY WERE WITHOUT MERIT.

## Disclosure 7 of 17

**Reporting Source:** Firm  
**Employing firm when activities occurred which led to the complaint:** A. G. EDWARDS & SONS, INC.  
**Allegations:** ALLEGED UNSUITABLE INVESTMENTS AND FAILURE TO MEET INVESTMENT GOALS. ALLEGED LOSSES OF \$106,257.  
**Product Type:**  
**Alleged Damages:** \$106,257.00

## Customer Complaint Information

**Date Complaint Received:** 09/12/1997  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:**  
**Settlement Amount:** \$71,692.89  
**Individual Contribution Amount:**  
**Firm Statement**  
AG EDWARDS & SONS, INC. PAID THE CUSTOMERS \$71,692.89.  
N/A

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**Reporting Source:** Individual  
**Employing firm when activities occurred which led to the complaint:** A. G. EDWARDS & SONS, INC.  
**Allegations:** PENN TRAFFIC BONDS NOT PRICED ON CLIENTS STATEMENTS. ALLEGED LOSS OF \$106,257.000 7A. WHAT WAS THE PRODUCT? PENN TRAFFIC BONDS  
**Product Type:**  
**Alleged Damages:** \$106,257.00

## Customer Complaint Information



**Date Complaint Received:** 09/12/1997  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:**  
**Settlement Amount:** \$71,692.89  
**Individual Contribution Amount:**  
**Broker Statement**  
A.G EDWARDS & SONS INC. PAID THE CUSOTMER \$71,692.89.  
ALL COMPLAINTS ORIGINATED FORM MY PURCHASE OF A FIRM RECOMMENDED BOND FOR A NUMBER OF MY REGULAR FIXED INCOME ACCOUNT. CLIENTS PURCHASED SIMILAR BONDS PREVIOUSLY AND THEREAFTER. I WAS IN REGULAR CONTACT WITH THE TRADER WHO MADE THE RECOMMENDATION AND THE ANALYST WHO FOLLOWED THE INVESTMENT FOR THE FIRM. EACH CALL TO THEM ELICITED A BUY OR HOLD RECOMMENDATION. AT NO TIME WAS A SELL RECOMMENDATION MADE. THESE COMPLAINTS ARE THE FIRST AND ONLY CLIENT COMPLAINTS MADE AGAINST ME DURING MY 14 YEARS IN THE SECURITIES INDUSTRY AND I BELIEVE THEY ARE UNFOUNDED. 9A. AT WHAT FIRM DID THE TRANSACTION TAKE PLACE? A.G EDWARDS & SONS, INC.

#### Disclosure 8 of 17

**Reporting Source:** Firm  
**Employing firm when activities occurred which led to the complaint:** A. G. EDWARDS & SONS, INC.  
**Allegations:** UNSUITABLE INVESTMENTS IN PENN TRAFFIC BONDS; ALLEGED LOSS OF \$110,000.

**Product Type:**  
**Alleged Damages:** \$110,000.00

#### Customer Complaint Information

**Date Complaint Received:** 05/16/1997  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:**  
**Settlement Amount:** \$78,000.00  
**Individual Contribution Amount:**  
**Firm Statement**  
A. G. EDWARDS SETTLED WITH THE CLIENT FOR \$78,000  
Not Provided



**Reporting Source:** Individual  
**Employing firm when activities occurred which led to the complaint:** A. G. EDWARDS & SONS, INC.

**Allegations:** BONDS NOT PRICED ON CLIENT'S STATEMENTS  
ALLEGED LOSS OF \$110,000.00

**Product Type:**  
**Alleged Damages:** \$110,000.00

### Customer Complaint Information

**Date Complaint Received:** 05/16/1997

**Complaint Pending?** No

**Status:** Settled

**Status Date:**

**Settlement Amount:** \$78,000.00

**Individual Contribution Amount:**

**Broker Statement**  
A.G. EDWARDS SETTLED WITH CLIENT FOR \$78,000.00  
ALL COMPLAINTS ORIGINATED FROM MY PURCHASE OF A  
FIRM RECOMMENDED BOND FOR A NUMBER OF MY REGULAR FIXED  
INCOME  
ACCOUNTS. CLIENTS PURCHASED SIMILAR BONDS PREVIOUSLY AND  
THEREAFTER. I WAS IN REGULAR CONTACT WITH THE TRADER WHO  
MADE  
THE RECOMMENDATION AND THE ANALYST WHO FOLLOWED THE  
INVESTMENT  
FOR THE FIRM. EACH CALL TO THEM ELICITED A BUY OR HOLD  
RECOMMENDATION. AT NO TIME WAS A SELL RECOMMENDATION MADE.  
THESE COMPLAINTS ARE THE FIRST AND ONLY CLIENT COMPLAINTS  
MADE  
AGAINST ME DURING MY 14 YEARS IN THE SECURITIES INDUSTRY AND I  
BELIEVE THEY ARE UNFOUNDED.

### Disclosure 9 of 17

**Reporting Source:** Firm  
**Employing firm when activities occurred which led to the complaint:** A. G. EDWARDS & SONS, INC.

**Allegations:** UNSUITABLE INVESTMENTS REGARDING PENN TRAFFIC  
BONDS: SEEKING \$126,769.

**Product Type:**  
**Alleged Damages:** \$126,769.00

### Customer Complaint Information

**Date Complaint Received:** 05/15/1997

**Complaint Pending?** No



**Status:** Settled  
**Status Date:**  
**Settlement Amount:** \$102,154.55  
**Individual Contribution Amount:**  
**Firm Statement** A.G. EDWARDS SETTLED WITH THE CLIENTS FOR \$102,154.55.  
Not Provided

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**Reporting Source:** Individual  
**Employing firm when activities occurred which led to the complaint:** A. G. EDWARDS & SONS, INC.  
**Allegations:** BONDS NOT PRICED ON CLIENT'S STATEMENTS  
ALLEGED LOSS OF \$126,769.00

**Product Type:**  
**Alleged Damages:** \$126,769.00

### Customer Complaint Information

**Date Complaint Received:** 05/15/1997  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:**  
**Settlement Amount:** \$102,154.55  
**Individual Contribution Amount:**  
**Broker Statement** A.G. EDWARDS SETTLED WITH THE CLIENTS FOR \$102,154.55  
ALL COMPLAINTS ORIGINATED FROM MY PURCHASE OF A FIRM RECOMMENDED BOND FOR A NUMBER OF MY REGULAR FIXED INCOME ACCOUNTS. CLIENTS PURCHASED SIMILAR BONDS PREVIOUSLY AND THEREAFTER. I WAS IN REGULAR CONTACT WITH THE TRADER WHO MADE THE RECOMMENDATION AND THE ANALYST WHO FOLLOWED THE INVESTMENT FOR THE FIRM. EACH CALL TO THEM ELICITED A BUY OR HOLD RECOMMENDATION. AT NO TIME WAS A SELL RECOMMENDATION MADE. THESE COMPLAINTS ARE THE FIRST AND ONLY CLIENT COMPLAINTS MADE AGAINST ME DURING MY 14 YEARS IN THE SECURITIES INDUSTRY AND I BELIEVE THEY ARE UNFOUNDED.

### Disclosure 10 of 17

**Reporting Source:** Firm



<b>Employing firm when activities occurred which led to the complaint:</b>	A. G. EDWARDS & SONS, INC.
<b>Allegations:</b>	UNSUITABLE RECOMENDATIONS REGARDING PENN TRAFFIC CO. BONDS; ALLEGED LOSS OF \$95,000. 7A. WHAT WAS THE PRODUCT? PENN TRAFFIC BOND
<b>Product Type:</b>	
<b>Alleged Damages:</b>	\$95,000.00
<b>Customer Complaint Information</b>	
<b>Date Complaint Received:</b>	01/22/1997
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	
<b>Settlement Amount:</b>	\$89,000.00
<b>Individual Contribution Amount:</b>	
<b>Firm Statement</b>	A. G. EDWARDS SETTLED FOR \$89,000. NOT PROVIDED 9A. WHAT FIRM DID THE TRANSACTION TAKE PLACE? A.G. EDWARDS
<hr/>	
<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	A. G. EDWARDS & SONS, INC.
<b>Allegations:</b>	RECOMMENDATIONS REGARDING PENN TRAFFIC W. BONDS. ALLEGED LOSS OF \$95,000.00
<b>Product Type:</b>	
<b>Alleged Damages:</b>	\$95,000.00
<b>Customer Complaint Information</b>	
<b>Date Complaint Received:</b>	01/22/1997
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	
<b>Settlement Amount:</b>	\$89,000.00
<b>Individual Contribution Amount:</b>	
<b>Broker Statement</b>	A.G. EDWARDS SETTLED FOR \$89,000.00 ALL CLIENT COMPLAINTS ORIGINATED FROM MY PURCHASE OF A FIRM RECOMMENDED BOND FOR A NUMBER OF MY REGULAR FIXED INCOME ACCOUNTS. CLIENTS PURCHASED SIMILAR BONDS PREVIOUSLY AND THEREAFTER. I WAS IN REGULAR CONTACT WITH THE TRADER WHO MADE THE RECOMMENDATION AND THE ANALYST WHO FOLLOWED THE INVEST- MENT FOR THE FIRM. EACH CALL TO THEM ELICITED A BUY OR HOLD RECOMMENDATION. AT NO TIME WAS A SELL RECOMMENDATION



MADE.

THESE CLIENT COMPLAINTS ARE THE FIRST AND ONLY CLIENT COMPLAINTS MADE AGAINST ME DURING MY 14 YEARS IN THE SECURITIES INDUSTRY AND I BELIEVE THEY ARE UNFOUNDED.

#### Disclosure 11 of 17

**Reporting Source:** Firm  
**Employing firm when activities occurred which led to the complaint:** A. G. EDWARDS & SONS, INC.  
**Allegations:** UNSUITABLE RECOMMENDATIONS REGARDING PENN TRAFFIC CO. BONDS; ALLEGED LOSSES UNSPECIFIED BUT THOUGHT TO BE IN EXCESS OF \$10,000.  
7A. WHAT WAS THE PRODUCT? PENN TRAFFIC BONDS

**Product Type:**

**Alleged Damages:**

#### Customer Complaint Information

**Date Complaint Received:** 01/24/1997  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:**  
**Settlement Amount:** \$16,659.69  
**Individual Contribution Amount:**  
**Firm Statement** A. G. EDWARDS SETTLED FOR \$16,659.69.  
NOT PROVIDED  
9A. WHAT FIRM DID THE TRANSACTION TAKE PLACE? A. G. EDWARDS

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**Reporting Source:** Individual  
**Employing firm when activities occurred which led to the complaint:** A. G. EDWARDS & SONS, INC.  
**Allegations:** RECOMMENDATIONS REGARDING PENN TRAFFIC CO. BONDS. ALLEGED LOSSES UNSPECIFIED BUT THOUGHT TO BE IN EXCESS OF \$10,000.00.

**Product Type:**

**Alleged Damages:**

#### Customer Complaint Information

**Date Complaint Received:** 01/24/1997  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:**



**Settlement Amount:** \$16,659.69

**Individual Contribution Amount:**

**Broker Statement**

A.G. EDWARDS SETTLED FOR \$16,659.69  
ALL CLIENT COMPLAINTS ORIGINATED FROM MY PURCHASE  
OF A FIRM RECOMMENDED BOND FOR A NUMBER OF MY REGULAR FIXED  
INCOME ACCOUNTS. CLIENTS PURCHASED SIMILAR BONDS PREVIOUSLY  
AND THEREAFTER. I WAS IN REGULAR CONTACT WITH THE TRADER WHO  
MADE THE RECOMMENDATION AND THE ANALYST WHO FOLLOWED THE  
INVESTMENT FOR THE FIRM. EACH CALL TO THEM ELICITED A BUY OR  
HOLD RECOMMENDATION. AT NO TIME WAS A SELL RECOMMENDATION  
MADE. THESE CLIENT COMPLAINTS ARE THE FIRST AND ONLY CLIENT  
COMPLAINTS MADE AGAINST ME DURING MY 14 YEARS IN THE  
SECURITIES  
INDUSTRY AND I BELIEVE THEY ARE UNFOUNDED.

#### Disclosure 12 of 17

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** A. G. EDWARDS & SONS, INC.

**Allegations:** ALLEGED UNSUITABLE RECOMMENDATIONS OF PENN TRAFFIC BONDS CAUSING LOSSES OF \$50,000

**Product Type:**

**Alleged Damages:** \$50,000.00

#### Customer Complaint Information

**Date Complaint Received:** 03/03/1997

**Complaint Pending?** No

**Status:** Settled

**Status Date:**

**Settlement Amount:** \$32,197.13

**Individual Contribution Amount:**

**Firm Statement** A.G. EDWARDS SETTLED FOR \$32,197.13  
Not Provided

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** A. G. EDWARDS & SONS, INC.

**Allegations:** CUSTOMER CLAIMS TO HAVE BEEN UNAWARE OF PRICE DECLINE, ALLEGED LOSSES OF \$50,000

**Product Type:**

**Alleged Damages:** \$50,000.00

#### Customer Complaint Information



**Date Complaint Received:** 03/03/1997

**Complaint Pending?** No

**Status:** Settled

**Status Date:**

**Settlement Amount:** \$32,197.13

**Individual Contribution Amount:**

**Broker Statement**

A.G. EDWARDS SETTLED WITH THE CLIENT FOR \$32,197.13  
ALL CLIENT COMPLAINTS ORIGINATED FROM MY PURCHASE OF A FIRM RECOMMENDED BOND FOR A NUMBER OF MY REGULAR FIXED INCOME ACCOUNTS. CLIENTS PURCHASED SIMILAR BONDS PREVIOUSLY AND THEREAFTER. I WAS IN REGULAR CONTACT WITH THE TRADER WHO MADE THE RECOMMENDATION AND THE ANALYST WHO FOLLOWED THE INVESTMENT FOR THE FIRM. EACH CALL TO THEM ELICITED A BUY OR HOLD RECOMMENDATION. AT NO TIME WAS A SELL RECOMMENDATION MADE. THESE CLIENT COMPLAINTS ARE THE FIRST AND ONLY CLIENT COMPLAINTS MADE AGAINST ME DURING MY 14 YEARS IN THE SECURITIES INDUSTRY AND I BELIEVE THEY ARE UNFOUNDED.

### Disclosure 13 of 17

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** A. G. EDWARDS & SONS, INC.

**Allegations:** UNSUITABLE RECOMMENDATIONS OF PENN TRAFFIC BONDS CAUSING DAMAGES OF \$150,000.

**Product Type:**

**Alleged Damages:** \$150,000.00

### Customer Complaint Information

**Date Complaint Received:** 03/14/1997

**Complaint Pending?** No

**Status:** Settled

**Status Date:**

**Settlement Amount:** \$123,096.00

**Individual Contribution Amount:**

**Firm Statement**

A.G. EDWARDS SETTLED FOR \$123,096.  
Not Provided

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**Reporting Source:** Individual



<b>Employing firm when activities occurred which led to the complaint:</b>	A. G. EDWARDS & SONS, INC.
<b>Allegations:</b>	CUSTOMER CLAIMS TO HAVE BEEN UNAWARE OF PRICE DECLINE ALLEGED LOSSES OF \$150,000
<b>Product Type:</b>	
<b>Alleged Damages:</b>	\$150,000.00
<b>Customer Complaint Information</b>	
<b>Date Complaint Received:</b>	03/14/1997
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	
<b>Settlement Amount:</b>	\$123,096.00
<b>Individual Contribution Amount:</b>	
<b>Broker Statement</b>	A.G. EDWARDS SETTLED WITH THE CLIENT FOR \$123,096 ALL CLIENT COMPLAINTS ORIGINATED FROM PURCHASE OF A FIRM RECOMMENDED BOND FOR A NUMBER OF MY REGULAR FIXED INCOME ACCOUNTS. CLIENTS PURCHASED SIMILAR BONDS PREVIOUSLY AND THEREAFTER. I WAS IN REGULAR CONTACT WITH THE TRADER WHO MADE THE RECOMMENDATION AND THE ANALYST WHO FOLLOWED THE INVESTMENT FOR THE FIRM. EACH CALL TO THEM ELICITED A BUY OR HOLD RECOMMENDATION. AT NO TIME WAS A SELL RECOMMENDATION MADE. THESE CLIENT COMPLAINTS ARE THE FIRST AND ONLY CLIENT COMPLAINTS MADE AGAINST ME DURING MY 14 YEARS IN THE SECURITIES INDUSTRY AND I BELIEVE THEY ARE UNFOUNDED.

<b>Disclosure 14 of 17</b>	
<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	A. G. EDWARDS & SONS, INC.
<b>Allegations:</b>	FAILURE TO DISCLOSE RISKS AND UNSUITABLE RECOMMENDATIONS REGARDING PENN TRAFFIC CO. BONDS; UNSPECIFIED AMOUNT OF DAMAGES BUT THOUGHT TO BE IN EXCESS OF \$10,000
<b>Product Type:</b>	

<b>Alleged Damages:</b>	
<b>Customer Complaint Information</b>	
<b>Date Complaint Received:</b>	01/24/1997
<b>Complaint Pending?</b>	No



<b>Status:</b>	Settled
<b>Status Date:</b>	
<b>Settlement Amount:</b>	\$26,956.00
<b>Individual Contribution Amount:</b>	
<b>Broker Statement</b>	A.G. EDWARDS WITH THE CLIENT FOR \$26,956. ALL COMPLAINTS ORIGINATED FROM MY PURCHASE OF A FIRM RECOMMENDED BOND FOR A NUMBER OF MY REGULAR FIXED INCOME ACCOUNTS. CLIENTS PURCHASED SIMILAR BONDS PREVIOUSLY AND THEREAFTER. I WAS IN REGULAR CONTACT WITH THE TRADER WHO MADE THE RECOMMENDATION AND THE ANALYST WHO FOLLOWED THE INVESTMENT FOR THE FIRM. EACH CALL TO THEM ELICITED A BUY OR HOLD RECOMMENDATION. AT NO TIME WAS A SELL RECOMMENDATION MADE. THESE COMPLAINTS ARE THE FIRST AND ONLY COMPLAINTS MADE AGAINST ME DURING 14 YEARS IN THE SECURITIES INDUSTRY AND I BELIEVE THEY ARE UNFOUNDED.

#### Disclosure 15 of 17

<b>Reporting Source:</b>	Firm
<b>Employing firm when activities occurred which led to the complaint:</b>	A. G. EDWARDS & SONS, INC.
<b>Allegations:</b>	FAILURE TO DISCLOSE RISKS AND UNSUITABLE RECOMMENDATIONS REGARDING PENN TRAFFIC CO. BONDS; ALLEGED LOSSES OF \$58,500.

#### Product Type:

<b>Alleged Damages:</b>	\$58,500.00
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#### Customer Complaint Information

<b>Date Complaint Received:</b>	02/12/1997
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	
<b>Settlement Amount:</b>	\$39,710.51
<b>Individual Contribution Amount:</b>	
<b>Firm Statement</b>	A.G. EDWARDS SETTLED WITH THE CLIENT FOR \$39,710.51. Not Provided

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<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	A. G. EDWARDS & SONS, INC.
<b>Allegations:</b>	CUSTOMER CLAIMS TO HAVE BEEN UNAWARE OF PRICE



DECLINE, ALLEGED LOSSES OF \$58,500.

**Product Type:**

**Alleged Damages:** \$58,500.00

**Customer Complaint Information**

**Date Complaint Received:** 02/12/1997

**Complaint Pending?** No

**Status:** Settled

**Status Date:**

**Settlement Amount:** \$39,710.51

**Individual Contribution**

**Amount:**

**Broker Statement**

A.G. EDWARDS SETTLED WITH THE CLIENT FOR \$39,710.51 ALL CLIENT COMPLAINTS ORIGINATED FROM MY PURCHASE OF A FIRM RECOMMENDED BOND FOR A NUMBER OF MY REGULAR FIXED INCOME ACCOUNTS. CLIENTS PURCHASED SIMILAR BONDS PREVIOUSLY AND THEREAFTER. I WAS IN REGULAR CONTACT WITH THE TRADER WHO MADE THE RECOMMENDATION AND THE ANALYST WHO FOLLOWED THE INVESTMENT FOR THE FIRM. EACH CALL TO THEM ELICITED A BUY OR HOLD RECOMMENDATION. AT NO TIME WAS A SELL RECOMMENDATION MADE. THESE CLIENT COMPLAINTS ARE THE FIRST AND ONLY CLIENT COMPLAINTS MADE AGAINST ME DURING MY 14 YEARS IN THE SECURITIES INDUSTRY AND I BELIEVE THE ARE UNFOUNDED.

**Disclosure 16 of 17**

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** A. G. EDWARDS & SONS, INC.

**Allegations:** FAILURE TO DISCLOSE RISKS AND UNSUITABLE RECOMMENDATIONS REGARDING PENN TRAFFIC CO. BONDS ALLEGED LOSSES ARE \$45,000.

**Product Type:**

**Alleged Damages:** \$45,000.00

**Customer Complaint Information**

**Date Complaint Received:** 01/20/1997

**Complaint Pending?** No

**Status:** Settled

**Status Date:**

**Settlement Amount:** \$36,753.00

**Individual Contribution Amount:**

**Broker Statement**

A.G. EDWARDS SETTLED WITH THE CLIENT FOR \$36,753.00 ALL COMPLAINTS ORIGINATED FROM MY PURCHASE OF A FIRM RECOMMENDED BOND FOR A NUMBER OF MY REGULAR FIXED INCOME ACCOUNTS. CLIENTS PURCHASED SIMILAR BONDS PREVIOUSLY AND THEREAFTER. I WAS IN REGULAR CONTACT WITH THE TRADER WHO MADE THE RECOMMENDATION AND THE ANALYST WHO FOLLOWED THE INVESTMENT FOR THE FIRM. EACH CALL TO THEM ELICITED A BUY OR HOLD RECOMMENDATION. AT NO TIME WAS A SELL RECOMMENDATION MADE. THESE COMPLAINTS ARE THE FIRST AND ONLY COMPLAINTS MADE AGAINST ME DURING MY 14 YEARS IN THE SECURITIES INDUSTRY AND I BELIEVE THEY ARE UNFOUNDED.

**Disclosure 17 of 17**

**Reporting Source:** Individual

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

**Allegations:** UNSUITABLE RECOMMENDATION OF PENN TRAFFIC BONDS CAUSING DAMAGES OF \$106,376. 7A. WHAT WAS THE PRODUCT? PENN TRAFFIC CO. BONDS

**Product Type:**

**Alleged Damages:** \$106,376.00

**Customer Complaint Information**

**Date Complaint Received:** 01/21/1997

**Complaint Pending?** No

**Status:** Settled

**Status Date:**

**Settlement Amount:** \$95,000.00

**Individual Contribution Amount:**

**Broker Statement**

A.G. EDWARDS SETTLED WITH THE CLIENT FOR \$95,000. ALL COMPLAINTS ORIGINATED FROM MY PURCHASE OF A FIRM RECOMMENDED BOND FOR A NUMBER OF MY REGULAR FIXED INCOME ACCOUNTS. CLIENTS PURCHASED SIMILAR BONDS PREVIOUSLY AND THEREAFTER. I WAS IN REGULAR CONTACT WITH THE TRADER WHO MADE THE RECOMMENDATION AND THE ANALYST WHO FOLLOWED THE INVESTMENT FOR THE FIRM. EACH CALL TO THEM ELICITED A BUY OR HOLD RECOMMENDATION. AT NO TIME WAS A SELL RECOMMENDATION MADE. THESE COMPLAINTS ARE THE FIRST AND ONLY COMPLAINTS MADE AGAINST ME DURING MY 14 YEARS IN THE SECURITIES INDUSTRY AND I BELIEVE



THEY ARE UNFOUNDED.



## 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:** MCLAUGHLIN, PIVEN, VOGEL INC.  
**Termination Type:** Voluntary Resignation  
**Termination Date:** 03/10/1989  
**Allegations:** N/A  
MCLAUGHLIN PIVEN FILED AN AMENDED U-5 ALLEGING  
AN INTERNAL REVIEW OF MR. LOMBARDO'S ALLEGED TAKING OF  
COMPANY  
PROPERTY AFTER HIS RESIGNATION.  
**Product Type:**  
**Other Product Types:**  
**Broker Statement** JOHN CONWAY, STAFF EXAMINER AT THE NASD, FELT THA  
THIS INCIDENT WAS A VENDETTA BY MCLAUGHLIN PIVEN AFTER MR.  
LOMBARDO RESIGNED. HE MARKED THE CASE FILED WITHOUT ACTION  
ON  
9/18/89.  
MR. LOMBARDO DENIES ALL ALLEGATIONS BY MCLAUGHLIN  
PIVEN AND STATES THAT HE TOOK NO RECORDS FROM THEM.



## End of Report

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