



IAPD Report

MICHAEL RAYMOND FRAGER

CRD# 1230622

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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

MICHAEL RAYMOND FRAGER (CRD# 1230622)

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 **01/14/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	BALBOA WEALTH PARTNERS, INC.	CRD# 282329	11/21/2016
B	WILLOW COVE INVESTMENT GROUP, INC.	CRD# 107824	04/27/2020

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **9** 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	INTEGRITY BROKERAGE SERVICES, INC.	117589	La Jolla, CA	01/06/2017 - 04/20/2020
B	INTEGRITY BROKERAGE SERVICES, INC.	117589	La Jolla, CA	01/05/2017 - 04/20/2020
IA	CENTAURUS FINANCIAL, INC.	30833	LA JOLLA, CA	03/16/2010 - 10/31/2016

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	10
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 9 jurisdiction(s) and 1 SRO(s) through his or her employer(s).

Employment 1 of 2

Firm Name: **WILLOW COVE INVESTMENT GROUP, INC.**
Main Address: 5887 T BAR LANE
WINNECONNE, WI 54986
Firm ID#: 107824

	Regulator	Registration	Status	Date
B	FINRA	Financial and Operations Principal	Approved	04/27/2020
B	FINRA	General Securities Principal	Approved	04/27/2020
B	FINRA	General Securities Representative	Approved	04/27/2020
B	FINRA	Invest. Co and Variable Contracts	Approved	04/27/2020
B	FINRA	Municipal Securities Representative	Approved	04/27/2020
B	FINRA	Operations Professional	Approved	04/27/2020
B	Arizona	Agent	Approved	06/26/2024
B	California	Agent	Approved	04/27/2020
B	Florida	Agent	Approved	07/17/2023
B	Nevada	Agent	Approved	02/25/2021
B	New York	Agent	Approved	10/22/2024
B	North Carolina	Agent	Approved	03/17/2025
B	Oregon	Agent	Approved	03/01/2022



Qualifications

Regulator	Registration	Status	Date
B Texas	Agent	Approved	04/27/2020
B Wyoming	Agent	Approved	05/10/2024

Branch Office Locations

WILLOW COVE INVESTMENT GROUP, INC.
 9404 GENESEE #340
 LA JOLLA, CA 92037

Employment 2 of 2

Firm Name: **BALBOA WEALTH PARTNERS, INC.**
 Main Address: 6263 NORTH SCOTTSDALE ROAD
 SUITE 265
 SCOTTSDALE, AZ 85250
 Firm ID#: 282329

Regulator	Registration	Status	Date
IA California	Investment Adviser Representative	Approved	11/21/2016
IA Texas	Investment Adviser Representative	Restricted Approval	08/21/2024

Branch Office Locations

BALBOA WEALTH PARTNERS, INC.
 9404 Genesee Avenue
 Suite 340
 La Jolla, CA 92037



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 2 principal/supervisory exams, 6 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

	Exam	Category	Date
B	Financial and Operations Principal Examination (S27)	Series 27	07/15/2017
B	General Securities Principal Examination (S24)	Series 24	06/30/2006

General Industry/Product Exams

	Exam	Category	Date
B	Operations Professional Examination (S99TO)	Series 99TO	01/02/2023
B	Municipal Securities Representative Examination (S52TO)	Series 52TO	01/02/2023
B	Investment Company Products/Variable Contracts Representative Examination (S6TO)	Series 6TO	01/02/2023
B	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
B	National Commodity Futures Examination (S3)	Series 3	03/05/1984
B	General Securities Representative Examination (S7)	Series 7	01/21/1984

State Securities Law Exams

	Exam	Category	Date
IA	Uniform Investment Adviser Law Examination (S65)	Series 65	09/18/1997
B	Uniform Securities Agent State Law Examination (S63)	Series 63	04/02/1984



PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **1** professional designation(s).

Chartered Financial Consultant

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



Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
IA	01/06/2017 - 04/20/2020	INTEGRITY BROKERAGE SERVICES, INC.	CRD# 117589	La Jolla, CA
B	01/05/2017 - 04/20/2020	INTEGRITY BROKERAGE SERVICES, INC.	CRD# 117589	La Jolla, CA
IA	03/16/2010 - 10/31/2016	CENTAURUS FINANCIAL, INC.	CRD# 30833	LA JOLLA, CA
B	03/12/2010 - 10/31/2016	CENTAURUS FINANCIAL, INC.	CRD# 30833	LA JOLLA, CA
IA	12/18/2007 - 03/12/2010	INDEPENDENT FINANCIAL GROUP, LLC	CRD# 7717	LA JOLLA, CA
B	12/14/2007 - 03/12/2010	INDEPENDENT FINANCIAL GROUP, LLC	CRD# 7717	LA JOLLA, CA
IA	07/06/2005 - 12/22/2009	SEAHORSE CAPITAL, INC.	CRD# 135676	LA JOLLA, CA
B	10/05/2007 - 12/18/2007	PRINCOR FINANCIAL SERVICES CORPORATION	CRD# 1137	LA JOLLA, CA
B	03/10/2006 - 10/31/2007	GRANITE SECURITIES, LLC	CRD# 104255	LAJOLLA, CA
IA	12/14/2004 - 03/18/2005	GIRARD SECURITIES, INC.	CRD# 18697	LA JOLLA, CA
B	08/14/2003 - 03/18/2005	GIRARD SECURITIES, INC.	CRD# 18697	SAN DIEGO, CA
B	01/22/2001 - 08/22/2003	FIRST WALL STREET CORP.	CRD# 13024	LA JOLLA, CA
B	07/12/1999 - 01/11/2001	BANC OF AMERICA INVESTMENT SERVICES, INC.	CRD# 16361	BOSTON, MA
B	12/14/1995 - 07/12/1999	BA INVESTMENT SERVICES, INC.	CRD# 12965	OAKLAND, CA
B	04/10/1992 - 09/14/1994	PRUDENTIAL SECURITIES INCORPORATED	CRD# 7471	NEW YORK, NY
B	01/25/1984 - 04/22/1992	LEHMAN BROTHERS INC.	CRD# 7506	NEW YORK, NY



Registration & Employment History

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
04/2020 - Present	Willow Cove Investment Group	Registered Principal & Representative	Y	Winneconne, WI, United States
11/2016 - Present	Balboa Wealth Partners, Inc.	Investment Adviser Representative	Y	Newport Beach, CA, United States
03/2005 - Present	FSA Integrated, LLC	FINANCIAL REPRESENTATIVE	Y	LA JOLLA, CA, United States
03/2010 - 11/2016	CENTAURUS FINANCIAL, INC	REGISTERED REPRESENTATIVE - BRANCH MANAGER	Y	ANAHEIM, 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.

ESTATE PLANNING -AGENT, MICHAEL FRAGER, CHFC, CLU - 9404 GENESEE AVE. #340 LA JOLLA, CA 92037 NON-INVESTMENT RELATED SINCE 07/1982 AND I SPEND APPROX. 35 HOURS PER MONTH ON THIS ACTIVITY. FINANCIAL PLANS & INSURANCE SALES. TAX PREPARER, MICHAEL FRAGER, EA- SAME ADDRESS AS ABOVE -NON-NVESTMENT RELATED SINCE AND 4/2013 I SPEND APPROX. 5 HOURS PER MONTH ON THIS ACTIVITY. PREPARE TAX RETURNS. MANAGING MEMBER, FSA INTEGRATED LLC -9404 GENESEE AVE., #340, LA JOLLA, CA 92037. NON-INVESTMENT RELATED SINCE 01/2012. FOR DBA BRANDING PURPOSES ONLY.

50% owner in St. Amour-Frager Realty. Director of company with 40 hrs per month spent on activity starting on 8/1/18. Acting as tax consultant to a real estate agent. Consulting work is done in the branch office, but no real estate transactions. Balboa Wealth Partners - RIA -Investment Related. 140 Newport Center Dr. #200 Newport Beach, CA 92660 - Investment Advisor - Since 1/2016 25-30 hours per month. Gather & Manage Assets.



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	10
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 10

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	INTEGRITY BROKERAGE SERVICES, INC.
Allegations:	Alleged unsuitable investment recommendation in November 2018
Product Type:	Debt-Asset Backed
Alleged Damages:	\$125,000.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	24-00004
Date Notice/Process Served:	01/08/2024
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	12/18/2024
Monetary Compensation Amount:	\$20,000.00
Individual Contribution Amount:	\$20,000.00



Broker Statement

I settled the case to avoid the substantial time and costs associated with a defense. The client was fully informed and suitable for the investment, based on the financial information she provided. Client received and reviewed all offering materials, participated in a conference call, and attended 2 seminars hosted by the investment's sponsor- both before and after making the investment- all of which thoroughly outlined the associated risks. Two years later, the client requested to liquidate \$5,000 of the investment, despite my strong recommendation to liquidate a more substantial amount between \$50,000 and \$75,000. The client had ample opportunities to liquidate the recommended amount or the entire investment but chose not to do so. The client received the \$5000 from the partial liquidation and \$31,886.90 in interest payments from the investment. Despite these facts, I chose to settle the case for both business and financial reasons.

Disclosure 2 of 10

Reporting Source:

Firm

Employing firm when activities occurred which led to the complaint:

INTEGRITY BROKERAGE SERVICES, INC.

Allegations:

unsuitable investment recommendation

Product Type:

Debt-Asset Backed

Alleged Damages:

\$125,000.00

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:

2202349

Docket/Case #:

2202349

Filing date of arbitration/CFTC reparation or civil litigation:

11/01/2022

Customer Complaint Information

Date Complaint Received:

11/04/2022

Complaint Pending?

No

Status:

Closed/No Action

Status Date:

08/22/2023

Settlement Amount:

Individual Contribution Amount:

Firm Statement

I was asked to write "Details were previously entered in the name of a respondent in arbitration by mistake. The rep was a subject."

Reporting Source:

Individual



Employing firm when activities occurred which led to the complaint: INTEGRITY BROKERAGE SERVICES, INC.

Allegations: Unsuitable investment recommendation | date unknown due to the written complaint not provided to or seen by me

Product Type: Debt-Asset Backed

Alleged Damages: \$125,000.00

Is this an oral complaint? No

Is this a written complaint? Yes

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

Arbitration/Reparation forum or court name and location: FINRA

Docket/Case #: 2202349

Filing date of arbitration/CFTC reparation or civil litigation: 11/01/2022

Customer Complaint Information

Date Complaint Received: 11/04/2022

Complaint Pending? No

Status: Closed/No Action

Status Date: 08/22/2023

Settlement Amount:

Individual Contribution Amount:

Disclosure 3 of 10

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: BANC OF AMERICA INVESTMENT SERVICES, INC.

Allegations: CUSTOMER ALLEGES UNSUITABLE CHANGES IN INVESTMENT PORTFOLIO. HE LOSS LIQUIDITY AND ASSUMED ADDITIONAL RISK.

Product Type: Mutual Fund(s)

Alleged Damages: \$4,200.00

Customer Complaint Information

Date Complaint Received: 12/12/2001

Complaint Pending? No

Status: Settled

Status Date: 05/04/2002

Settlement Amount: \$5,943.50



Individual Contribution Amount: \$0.00

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Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: BANK OF AMERICA INVESTMENT SERVICES INC

Allegations: CUSTOMER ALLEGES UNSUITABLE CHANGES IN INVESTMENT PORTFOLIO. HE LOSS LIQUIDITY AND ASSUMED ADDITIONAL RISK

Product Type: Mutual Fund(s)

Alleged Damages: \$4,200.00

Customer Complaint Information

Date Complaint Received: 12/21/2001

Complaint Pending? No

Status: Settled

Status Date: 05/04/2002

Settlement Amount: \$5,943.50

Individual Contribution Amount: \$0.00

Disclosure 4 of 10

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: BANC OF AMERICA INVESTMENT SERVICES INC.

Allegations: CLIENT ALLEGES THE LIQUIDATION OF MUTUAL FUNDS AND SWITCH TO VARIABLE ANNUITY IN MARCH OF 2000 WAS UNSUITABLE AND SALES CHARGES ASSOCIATED WITH SWITCH WERE NOT DISCLOSED.

Product Type: Annuity(ies) - Variable

Other Product Type(s): MUTUAL FUNDS

Alleged Damages: \$0.00

Customer Complaint Information

Date Complaint Received: 04/17/2001

Complaint Pending? No

Status: Settled

Status Date: 03/27/2002

Settlement Amount: \$10,749.70

Individual Contribution Amount: \$0.00

Firm Statement BANC OF AMERICA INVESTMENT SERVICES INC. REIMBURSED CLIENT FOR SALES CHARGES WHICH WERE NOT DISCLOSED. WE ALSO OFFERED TO PAY THE SURRENDER CHARGES IF THE CLIENT ELECTED TO SURRENDER



THE VARIABLE ANNUITY, ALTHOUGH WE DID NOT DETERMINE THE ANNUITY WAS UNSUITABLE. CLIENT ELECTED TO REMAIN IN THE VARIABLE ANNUITY.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: BANC OF AMERICA INVESTMENT SERVICES INC.

Allegations: CLIENT ALLEGES THE LIQUIDATION OF MUTUAL FUNDS AND SWITCH TO VAIRABLE ANNUITY IN MARCH OF 2000 WAS UNSUITABLE AND SALES CHARGES ASSOCIATED WITH SWITCH WERE NOT DISCLOSED

Product Type: Mutual Fund(s)

Alleged Damages:

Customer Complaint Information

Date Complaint Received: 04/17/2001

Complaint Pending? No

Status: Settled

Status Date: 03/27/2002

Settlement Amount: \$10,749.70

Individual Contribution Amount: \$0.00

Broker Statement BOA REIMBURSED THE CLIENT FOR SALES CHARGES WHICH THE CLIENT CLAIMED WERE NOT DISCLOSED. THEY OFFERED TO PAY THE SURRENDER CHARGES AS WELL IF THE CLIENT ELECTED TO SURRENDER THE VARIABLE ANNUITY. THEY ELECTED NOT. BOA SETTLED WITH CLIENT WITHOUT CONSULTING MIKE FRAGER. BOA DID NOT DETERMINE THE ANNUITY WAS UNSUITABLE. CLIENT ELECTED TO REMAIN IN THE VARIABLE ANNUITY. THE CLIENT @ THE TIME OF THE INVESTMENT PAID NO SURRENDER FEE'S FOR SWITCH INTO THE ANNUITY. THE CLIENT HAD NO BASIS OF THIS CLAIM. ALL

Disclosure 5 of 10

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint:

Allegations: MISREPRESENTATION, SUITABILITY, BREACH OF FIDUCIARY DUTY, BREACH OF IMPLIED COVENANT

Product Type: Equity Listed (Common & Preferred Stock)

Alleged Damages:

Customer Complaint Information

Date Complaint Received:

Complaint Pending? No

Status: Arbitration/Reparation



Status Date: 05/20/1996

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD; 94-02535

Date Notice/Process Served: 02/16/1995

Arbitration Pending? No

Disposition: Settled

Disposition Date: 05/20/1996

Monetary Compensation Amount: \$28,000.00

Individual Contribution Amount: \$0.00

Firm Statement CASE WAS SETTLED FOR BUSINESS REASONS. CONTACT PERSON: VICTOR A. MACHCINSKI JR. (212) 816-7267.

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Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: SMITH BARNEY

Allegations: EXCESSIVE TRADING, UNSUITABLE INVESTMENTS

Product Type: Other

Alleged Damages:

Customer Complaint Information

Date Complaint Received:

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 05/20/1996

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: 94-02535

Date Notice/Process Served: 09/01/1994

Arbitration Pending? No

Disposition: Settled

Disposition Date: 05/20/1996



Monetary Compensation Amount: \$28,000.00

Individual Contribution Amount:

Broker Statement SETTLED WITHOUT ADMISSION OF GUILT. THE SMITH BARNEY ATTORNEYS TOLD ME THEY HAD DECIDED TO SETTLE FOR FINANCIAL REASONS FOR THEIR FIRM. THEY DID NOT CONSULT ME AS TO THE DECISION.

Disclosure 6 of 10

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: BANC OF AMERICA INVESTMENT SERVICES, INC.

Allegations: UNSUITABLE INVESTMENT RECOMMENDATIONS, INAPPROPRIATE USE OF MUTUAL FUNDS SHARE CLASS AND MARGINING OF MUTUAL FUNDS.

Product Type: Mutual Fund(s)

Other Product Type(s): TREASURY STRIPS

Alleged Damages: \$722,811.00

Customer Complaint Information

Date Complaint Received: 06/16/2000

Complaint Pending? No

Status: Settled

Status Date: 12/15/2000

Settlement Amount: \$200,000.00

Individual Contribution Amount: \$0.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: #00-01750

Date Notice/Process Served: 06/16/2000

Arbitration Pending? No

Disposition: Settled

Disposition Date: 12/15/2000

Monetary Compensation Amount: \$200,000.00

Individual Contribution Amount: \$0.00

Firm Statement NONE

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Reporting Source: Individual



Employing firm when activities occurred which led to the complaint: BANK OF AMERICA INVESTMENT SERVICES INC.

Allegations: BREACH OF FIDUCIARY DUTY
PROFESSIONAL NEGLIGENCE
FIDUCIARY ABUSE OF ELDER

Product Type: Mutual Fund(s)

Alleged Damages: \$15,000,000.00

Customer Complaint Information

Date Complaint Received: 05/01/2000

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 12/15/2000

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: 00-01750

Date Notice/Process Served: 06/16/2000

Arbitration Pending? No

Disposition: Settled

Disposition Date: 12/15/2000

Monetary Compensation Amount: \$200,000.00

Individual Contribution Amount: \$0.00

Disclosure 7 of 10

Reporting Source: Firm

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

Allegations: CLIENT ALLEGED THAT BROKER UNAUTHORIZEDLY PURCHASED SHARES OF QUALITY PRODUCTS IN HIS ACCOUNT WHILE HE WAS OUT OF THE COUNTRY INCURRING LOSSES OF APPROX. \$44,000.00

Product Type:

Alleged Damages: \$44,000.00

Customer Complaint Information

Date Complaint Received: 11/11/1994

Complaint Pending? No

Status: Settled



Status Date: 01/16/1995

Settlement Amount: \$25,000.00

Individual Contribution Amount:

Firm Statement

PRUDENTIAL SECURITIES HAS AGREED TO PAY THE CLIENT \$25,000.00 IN SETTLEMENT OF HIS CLAIMS WITHOUT ADMITTING OR DENYING LIABILITY.
Not Provided

Reporting Source: Individual

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

Allegations: UNSUITABLE INVESTMENTS \$25,000 ALLEGED DAMAGES

Product Type: Investment Contract(s)

Alleged Damages: \$44,000.00

Customer Complaint Information

Date Complaint Received: 11/11/1994

Complaint Pending? No

Status: Settled

Status Date: 01/16/1995

Settlement Amount: \$25,000.00

Individual Contribution Amount: \$0.00

Broker Statement

PRUDENTIAL SETTLED WITHOUT MY CONSENT OR KNOWLEDGE OF THE SETTLEMENT
THIS 25,000 WAS LESS THAN 10% OF [CUSTOMERS] ACCOUNT. HE WAS FINE WITH IT UNTIL IT WENT DOWN AND THE NEW BROKER SOLD HIM OUT WITH A BIG LOSS

Disclosure 8 of 10

Reporting Source: Regulator

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

Allegations: MISREPRESENTATION; SUITABILITY; BRCH OF FIDUCIARY DT; ACCOUNT RELATED - FAILURE TO SUPERVISE

Product Type:

Alleged Damages: \$250,000.00

Arbitration Information



Arbitration/Reparation Claim filed with and Docket/Case No.: UNKNOWN - CASE #95-00023

Date Notice/Process Served: 01/06/1995

Arbitration Pending? No

Disposition: Settled

Disposition Date: 09/10/1996

Disposition Detail: CASE CLOSED,SETTLED/OTHER
ACTUAL/COMPENSATORY DAMAGES, RELIEF REQUEST IS OVER FOR OTHER REASONS, AWARD AMOUNT JOINTLY AND SEVERALLY; ACTUAL/COMPENSATORY DAMAGES, RELIEF REQUEST IS OVER FOR OTHER REASONS, AWARD AMOUNT JOINTLY AND SEVERALLY; INTEREST, RELIEF REQUEST IS OVER FOR OTHER REASONS, AWARD AMOUNT JOINTLY AND SEVERALLY; PUNITIVE/EXEMPLARY DAMAGES, RELIEF REQUEST IS OVER FOR OTHER REASONS, AWARD AMOUNT JOINTLY AND SEVERALLY; ATTORNEY'S FEES, RELIEF REQUEST IS OVER FOR OTHER REASONS, AWARD AMOUNT JOINTLY AND SEVERALLY; OTHER COSTS, RELIEF REQUEST IS OVER FOR OTHER REASONS, AWARD AMOUNT JOINTLY AND SEVERALLY; OTHER MONETARY RELIEF, RELIEF REQUEST IS OVER FOR OTHER REASONS, AWARD AMOUNT JOINTLY AND SEVERALLY

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: PRUDENTIAL SECRTITIES, INC.

Allegations: CUSTOMER ALLEGES EXCESSIVE MARGIN TRADING IN SPECULATIVE STOCKS WITH ALLEGED DAMAGES OF \$250,000.

Product Type:

Alleged Damages: \$250,000.00

Customer Complaint Information

Date Complaint Received: 08/04/1994

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 09/10/1996

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: 95-00023

Date Notice/Process Served: 01/06/1995



Arbitration Pending? No
Disposition: Settled
Disposition Date: 09/10/1996
Monetary Compensation Amount: \$72,500.00
Individual Contribution Amount:
Firm Statement STEELED FOR \$72,500
MATTER WAS DISMISSED AGAINST BROKER

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: PRUDENTIAL SECURITIES, INC.
Allegations: EXCESSIVE MARGIN TRADING IN SPECULATIVE STOCK WITH DAMAGES IN THE NEIGHBORHOOD OF \$250,000.
Product Type: Investment Contract(s)
Alleged Damages: \$250,000.00

Customer Complaint Information

Date Complaint Received: 08/04/1994
Complaint Pending? No
Status: Arbitration/Reparation
Status Date: 09/10/1996
Settlement Amount: \$72,500.00
Individual Contribution Amount: \$0.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: 95-00023
Date Notice/Process Served: 01/06/1995
Arbitration Pending? No
Disposition: Settled
Disposition Date: 09/10/1996
Monetary Compensation Amount: \$72,500.00
Individual Contribution Amount: \$0.00
Broker Statement SETTLEMENT \$72,500
PRUDENTIAL SETTLED WITHOUT MY KNOWLEDGE OR CONSENT. RECORD # 183922 IS A DUPLICATE OF THIS RECORD, AND SHOULD BE DELETED.



Disclosure 9 of 10

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: PRUDENTIAL SECURITIES INCORPORATED

Allegations: SUITABILITY OF INVESTMENTS FOR 87 YEAR OLD CLIENT. LOSSES IN ACCOUNT TOTALLED \$48,488.00

Product Type:

Alleged Damages: \$48,488.00

Customer Complaint Information

Date Complaint Received: 09/01/1994

Complaint Pending? No

Status: Settled

Status Date:

Settlement Amount: \$28,500.00

Individual Contribution Amount:

Firm Statement SETTLEMENT PAID BY PRUDENTIAL SECURITIES IN THE AMOUNT OF \$28,500.00
Not Provided

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: PRUDENTIAL SECURITIES INCORPORATED

Allegations: SUITABILITY OF INVESTMENTS FOR 87 YEARS OLD CLIENT. LOSS IN ACCOUNT TOTALLED \$48,488

Product Type: Investment Contract(s)

Alleged Damages: \$48,488.00

Customer Complaint Information

Date Complaint Received: 09/01/1994

Complaint Pending? No

Status: Settled

Status Date: 06/12/1995

Settlement Amount: \$28,500.00

Individual Contribution Amount: \$0.00

Broker Statement SETTLEMENT PAID BY PRUDENTIAL SECURITIES WAS \$28,500
[CUSTOMER] ORIGINALLY HAD AN INVESTMENT IWTH ME OF \$100,000 WHICH GREW TO AN AMOUNT OF OVER \$260,000.
[CUSTOMER] MANY TIMES TOLD ME HE WANTED HIS ACCOUNT TO GROW AND



WAS NOT COUNTING ON IT FOR INCOME. HIS ACCOUNT VALUE DROPPED BACK TO \$112,000 AND AFTER I LEFT HE WAS APPROACHED BY AN ATTORNEY WHO CONVINCED HIM TO TRY TO GET THAT MONEY BACK. I HAD NO KNOWLEDGE OF HIS ALLEGATIONS OR CASE UNTIL B.A.I.S. MADE ME AWARE OF THIS.

Disclosure 10 of 10

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint:

Allegations: MISREPRESENTATION, SUITABILITY, BREACH OF FIDUCIARY DUTY. BREACH OF IMPLIED COVENANT. PRODUCT: EQUITIES AND OPTIONS. ALLEGED DAMAGES: UNSEPECIFIED.

Product Type:

Alleged Damages:

Customer Complaint Information

Date Complaint Received:

Complaint Pending? No

Status: Arbitration/Reparation

Status Date:

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: National Assoc. of Securities Dealers; 94-02535

Date Notice/Process Served: 02/16/1996

Arbitration Pending? No

Disposition: Settled

Disposition Date: 05/20/1996

Monetary Compensation Amount: \$28,000.00

Individual Contribution Amount:

Firm Statement CASE WAS SETTLED FOR BUSINESS REASONS IN THE AMOUNT OF \$28,000.00. FINANCIAL CONSULTANT WAS NOT ASKED TO CONTRIBUTE.
CONTACT PERSON: VICTOR A. MACHCINSKI JR. (212) 816-7267.

Reporting Source: Individual

Employing firm when PRUDENTIAL SECURITIES INCORPORATED



activities occurred which led to the complaint:

Allegations: MISREPRESENTATION OF STOCKS

Product Type: Investment Contract(s)

Alleged Damages:

Customer Complaint Information

Date Complaint Received: 08/12/1994

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 08/11/1995

Settlement Amount:

Individual Contribution Amount: \$0.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NATIONAL ASSOC. OF SECURITIES DEALERS; 95-00895

Date Notice/Process Served: 03/07/1995

Arbitration Pending? No

Disposition: Settled

Disposition Date: 05/20/1996

Monetary Compensation Amount: \$28,000.00

Individual Contribution Amount: \$0.00

Broker Statement I WAS DISMISSED WITHOUT PREJUDICE.
[CUSTOMER] HAD OTHER INVESTMENT ADVISORS, HOWEVER HE FIGURES PRUDENTIAL HAD THE BIGGEST POCKETS TO GO AFTER.



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: PRUDENTIAL SECURITIES INCORPORATED
Termination Type: Permitted to Resign
Termination Date: 08/25/1994
Allegations: N/A
AN AUTHORIZED TRADE
Product Type: Investment Contract(s)

Other Product Types:

Broker Statement

TERMINATION
THE TRADE IN QUESTION WAS IN REGARDS TO CUSTOMER JOHN LEE. WHO NEVER ALLEGED UNAUTHORIZED TRADING. HE WAS ONLY UPSET ABOUT HAVING LOST MONEY. THE PRUDENTIAL MANAGER OHN COLLURA WAS LOOKING FOR SOMETHING TO TERMINATE ME ON BECAUSE MY GROSS PRODUCTION HAD DROPPED BELOW \$10,000 PER MONTH. MR. LEE NEVER MADE THIS ALLEGATION AND MR. COLLURA MADE A SPOT DECISION ON THE PHONE TO SETTLE WITH THE LEES.



End of Report

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