



IAPD Report

JAMES EDWARD BASHAW

CRD# 1251491

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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 EDWARD BASHAW (CRD# 1251491)

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 **05/18/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	INDEPENDENT FINANCIAL GROUP, LLC	CRD# 7717	03/31/2022
IA	INDEPENDENT FINANCIAL GROUP, LLC	CRD# 7717	04/13/2022

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **11** 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	INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC	144426	HOUSTON, TX	01/07/2016 - 04/12/2022
B	INTERNATIONAL ASSETS ADVISORY, LLC	10645	HOUSTON, TX	10/29/2014 - 04/12/2022
IA	INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC	144426	HOUSTON, TX	04/01/2015 - 12/31/2015

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	1
Customer Dispute	3
Termination	1
Financial	1



Report Summary

Judgment/Lien 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 **11** 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
	FINRA	General Securities Representative	Approved	03/31/2022
	FINRA	General Securities Sales Supervisor	Approved	03/31/2022
	FINRA	Municipal Securities Principal	Approved	03/31/2022
	FINRA	Municipal Securities Representative	Approved	03/31/2022
	California	Agent	Restricted Approval	05/21/2026
	Colorado	Agent	Approved	02/01/2023
	Georgia	Agent	Approved	06/14/2022
	Louisiana	Agent	Approved	03/31/2022
	Maryland	Agent	Approved	04/01/2022
	Mississippi	Agent	Approved	12/13/2022
	New Mexico	Agent	Approved	01/12/2026
	Ohio	Agent	Approved	12/13/2022
	Pennsylvania	Agent	Approved	04/13/2022



Qualifications

	Regulator	Registration	Status	Date
B	Texas	Agent	Approved	04/13/2022
IA	Texas	Investment Adviser Representative	Approved	04/13/2022
B	Washington	Agent	Approved	12/12/2023

Branch Office Locations

INDEPENDENT FINANCIAL GROUP, LLC

5701 Woodway Drive #330

Houston, TX 77057



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 4 principal/supervisory exams, 5 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

	Exam	Category	Date
	General Securities Sales Supervisor - General Module Examination (S10)	Series 10	01/02/2023
	General Securities Sales Supervisor - Options Module Examination (S9)	Series 9	01/02/2023
	Municipal Securities Principal Examination (S53)	Series 53	03/13/2006
	General Securities Sales Supervisor Examination (Options Module & General Module) (S8)	Series 8	05/30/1997

General Industry/Product Exams

	Exam	Category	Date
	Municipal Securities Representative Examination (S52TO)	Series 52TO	01/02/2023
	General Securities Representative Examination (S7TO)	Series 7TO	10/02/2019
	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
	National Commodity Futures Examination (S3)	Series 3	02/07/2001
	General Securities Representative Examination (S7)	Series 7	06/16/1984

State Securities Law Exams

	Exam	Category	Date
	Uniform Investment Adviser Law Examination (S65)	Series 65	05/12/1997
	Uniform Securities Agent State Law Examination (S63)	Series 63	06/26/1984



PROFESSIONAL DESIGNATIONS

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

No information reported.

Only professional designations listed in Question 8 of the Form U4 will appear in this section if the appropriate box is checked and verified by the issuing organization at the time of the filing. Learn more about eligible designations at [IARD](#) and [NASAA](#).



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	01/07/2016 - 04/12/2022	INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC	CRD# 144426	HOUSTON, TX
B	10/29/2014 - 04/12/2022	INTERNATIONAL ASSETS ADVISORY, LLC	CRD# 10645	HOUSTON, TX
IA	04/01/2015 - 12/31/2015	INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC	CRD# 144426	HOUSTON, TX
B	09/29/2014 - 10/17/2014	WUNDERLICH SECURITIES, INC.	CRD# 2543	HOUSTON, TX
IA	09/29/2014 - 10/09/2014	WUNDERLICH SECURITIES, INC.	CRD# 2543	HOUSTON, TX
IA	11/20/2001 - 10/03/2014	LPL FINANCIAL LLC	CRD# 6413	HOUSTON, TX
B	11/09/2001 - 10/03/2014	LPL FINANCIAL LLC	CRD# 6413	HOUSTON, TX
IA	06/17/2005 - 07/10/2013	JAMES E.BASHAW & CO.	CRD# 129320	HOUSTON, TX
B	08/14/2000 - 11/16/2001	UBS PAINWEBBER INC.	CRD# 8174	WEEHAWKEN, NJ
B	04/28/1998 - 08/14/2000	J.C. BRADFORD & CO.	CRD# 1287	NEW YORK, NY
B	04/21/1994 - 04/21/1998	SUNTRUST EQUITABLE SECURITIES	CRD# 6271	ATLANTA, GA
B	08/07/1991 - 04/19/1994	AUGUSTA SECURITIES CORP.	CRD# 23669	HOUSTON, TX
B	03/26/1990 - 09/13/1991	FIRST AMERICA EQUITIES CORP.	CRD# 7652	
B	01/09/1991 - 07/09/1991	THOMAS F. WHITE & CO., INCORPORATED	CRD# 7661	SAN FRANCISCO, CA
B	10/07/1986 - 06/17/1988	KIDDER, PEABODY & CO. INCORPORATED	CRD# 7613	
B	06/20/1984 - 10/16/1986	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	



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
01/2024 - Present	funeralnegotiators.com	Agent/Representative	N	N/A, TX, United States
03/2022 - Present	INDEPENDENT FINANCIAL GROUP, LLC	REGISTERED REPRESENTATIVE	Y	HOUSTON, TX, United States
10/2014 - 03/2022	INTERNATIONAL ASSETS ADVISORY	REGISTERED REP	Y	ORLANDO, FL, United States
10/2014 - 03/2022	INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC	INVESTMENT ADVISOR REPRESENTATIVE	Y	HOUSTON, TX, United States

OTHER BUSINESS ACTIVITIES

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

(1) JAMES E. BASHAW & CO.

POSITION: Officer/Director NATURE: DBA Name for Marketing Purposes Only INVESTMENT RELATED: Yes NUMBER OF HOURS: 160 SECURITIES TRADING HOURS: 120 START DATE: 11/01/2001
ADDRESS: 5701 Woodway Drive #330, Houston TX 77057
DESCRIPTION: DBA for marketing purposes

(2) REFERRAL SERVICES

POSITION: Independent Contractor NATURE: Referral Services INVESTMENT RELATED: Yes NUMBER OF HOURS: 4
SECURITIES TRADING HOURS: 0 START DATE: 01/01/2021
ADDRESS: 504 Asbury St., Houston TX 77007
DESCRIPTION: Referrals to Commerce bank

(3) BSK LEASE MANAGEMENT

POSITION: Owner NATURE: DBA Name for Marketing Purposes Only INVESTMENT RELATED: No NUMBER OF HOURS: 2
SECURITIES TRADING HOURS: 0 START DATE: 01/01/2018
ADDRESS: 504 Asbury St., Houston TX 77007
DESCRIPTION: Hunting camp

(4) CATHOLIC ENDOWMENT FOUNDATION OF GALVESTON HOUSTON

POSITION: Officer/Director NATURE: Board Member or Officer (Profit or Non-Profit) INVESTMENT RELATED: No NUMBER OF HOURS: 2 SECURITIES TRADING HOURS: 0 START DATE: 01/01/2000
ADDRESS: 1700 San Jacinto, Houston TX 77002
DESCRIPTION: Provide board level oversight/advice

(5) HOUSTON LIVESTOCK SHOW AND RODEO

POSITION: Volunteer NATURE: Volunteer INVESTMENT RELATED: No NUMBER OF HOURS: 4 SECURITIES TRADING HOURS: 0 START DATE: 01/03/2000
ADDRESS: 504 Asbury, Houston TX 77007
DESCRIPTION: Provide scholarships

(6) CATHOLIC CHARITES



Registration & Employment History



OTHER BUSINESS ACTIVITIES

POSITION: Officer/Director NATURE: Board Member or Officer (Profit or Non-Profit) INVESTMENT RELATED: No NUMBER OF HOURS: 1 SECURITIES TRADING HOURS: 0 START DATE: 01/01/2010
ADDRESS: 2900 Louisiana St, Houston TX 77006
DESCRIPTION: Advisory director/volunteer

(7) AUTHOR, JEB BASHAW

POSITION: Author NATURE: Other: INVESTMENT RELATED: No NUMBER OF HOURS: 1 SECURITIES TRADING HOURS: 0
START DATE: 01/01/2021
ADDRESS: 504 Asbury St., Houston TX 77077
DESCRIPTION: Write & publish books.

(8) JEB & CO.

POSITION: Officer/Director NATURE: DBA Name for Marketing Purposes Only INVESTMENT RELATED: Yes NUMBER OF HOURS: 160 SECURITIES TRADING HOURS: 160 START DATE: 11/01/2001
ADDRESS: 5701 Woodway Drive #330, Houston TX 77057
DESCRIPTION: DBA for marketing purposes

(9) NOTARY

POSITION: Independent Contractor NATURE: Notary INVESTMENT RELATED: Yes NUMBER OF HOURS: 1 SECURITIES TRADING HRS: 0 START DATE: 11/01/2001
ADDRESS: 5701 Woodway Drive #330, Houston TX 77057
DESCRIPTION: Notary Services

(10) SIGNUP RX SOLUTIONS LLC

POSITION: Independent Contractor NATURE: Referral Services INVESTMENT RELATED: No NUMBER OF HOURS: 2
SECURITIES TRADING HRS: 0 START DATE: 02/15/2024
ADDRESS: 504 Asbury, Houston TX 77007
DESCRIPTION: Consulting to businesses on drug plans for employees

(11) POSITION: Independent Contractor NATURE: Other: INVESTMENT RELATED: No NUMBER OF HOURS: 1 SECURITIES TRADING HRS: 0 START DATE: 01/25/2024
ADDRESS: 504 Asbury, Houston TX 77007
DESCRIPTION: Perform marriages

THE DOCTORS ADVISOR

POSITION: Agent/Representative NATURE: DBA Name for Marketing Purposes Only INVESTMENT RELATED: Yes NUMBER OF HOURS: 5 SECURITIES TRADING HRS: 2 START DATE: 12/03/2024
ADDRESS: 5701 Woodway Drive #330, Houston TX 77057
DESCRIPTION: Marketing to doctors through an IFG approved platform

MIPROSPECT

POSITION: Independent Contractor NATURE: Referral Services INVESTMENT RELATED: No NUMBER OF HOURS: 5
SECURITIES TRADING HRS: 1 START DATE: 05/30/2025
ADDRESS: 5701 Woodway Drive #330, Houston TX 77057
DESCRIPTION: Referring small business owners for IT app

GMR GOLD

POSITION: Independent Contractor NATURE: Referral Services INVESTMENT RELATED: Yes NUMBER OF HOURS: 5
SECURITIES TRADING HRS: 0 START DATE: 07/14/2025
ADDRESS: 504 Asbury, Houston TX 77007



Registration & Employment History



OTHER BUSINESS ACTIVITIES

DESCRIPTION: Refer people to open gold IRA or Pension plan

FUNERALNEGOTIATORS.COM

POSITION: Independent Contractor NATURE: Referral Services INVESTMENT RELATED: No NUMBER OF HOURS: 6

SECURITIES TRADING HRS: 0 START DATE: 01/31/2024

ADDRESS: 504 Asbury, N/A, Houston TX 77007

DESCRIPTION: commission from funeral planning



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	1
Customer Dispute	3
Termination	1
Financial	1
Judgment/Lien	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 1

Reporting Source: Regulator

Regulatory Action Initiated By: FINRA

Sanction(s) Sought:

Date Initiated: 04/23/2019

Docket/Case Number: 2014042876501

Employing firm when activity occurred which led to the regulatory action: LPL Financial LLC

Product Type: No Product

Allegations: Without admitting or denying the findings, Bashaw consented to the sanctions and to the entry of findings that he borrowed a total of approximately \$200,000 from a customer without seeking or obtaining prior approval of the loans from his member firm. The findings stated that Bashaw did not make repayment on the loans. The findings also stated that in annual compliance questionnaires, Bashaw falsely told his firm that he had not borrowed any money from another individual, which the questionnaires identified as a prohibited activity.

Current Status: Final

Resolution: Acceptance, Waiver & Consent(AWC)



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

No

Resolution Date:

04/23/2019

Sanctions Ordered:

Civil and Administrative Penalty(ies)/Fine(s)
Requalification
Suspension

If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?

No

(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?

(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or



(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Sanction 1 of 1

Sanction Type: Suspension

Capacities Affected: All Capacities

Duration: four months

Start Date: 05/20/2019

End Date: 09/19/2019

Requalification 1 of 1

Requalification Type: Requalification by Exam

Length of time given to requalify: n/a

Type of exam required : S7, General Securities Representative Examination

Has condition been satisfied: No

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$5,000.00

Portion Levied against individual: \$5,000.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual: 05/09/2019

Was any portion of penalty waived? No

Amount Waived:

Regulator Statement Fines paid in full on May 9, 2019.

Reporting Source: Individual



Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	
Date Initiated:	04/23/2019
Docket/Case Number:	2014042876501
Employing firm when activity occurred which led to the regulatory action:	LPL FINANCIAL LLC
Product Type:	No Product
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, BASHAW CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT HE BORROWED A TOTAL OF APPROXIMATELY \$200,000 FROM A CUSTOMER WITHOUT SEEKING OR OBTAINING PRIOR APPROVAL FROM HIS MEMBER FIRM. THE FINDINGS STATED THAT IN ANNUAL COMPLIANCE QUESTIONNAIRES, BASHAW FALSELY TOLD HIS FIRM THAT HE HAD NOT BORROWED ANY MONEY FROM ANOTHER INDIVIDUAL, WHICH THE QUESTIONNAIRES IDENTIFIED AS A PROHIBITED ACTIVITY.
Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	04/23/2019
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Requalification Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	ALL CAPACITIES
Duration:	FOUR MONTHS
Start Date:	05/20/2019
End Date:	09/19/2019
Requalification 1 of 1	
Requalification Type:	Requalification by Exam
Length of time given to requalify:	N/A
Type of exam required :	S7 GENERAL SECURITIES REPRESENTATIVE EXAMINATION
Has condition been satisfied:	No
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)



Total Amount: \$5,000.00

Portion Levied against individual: \$5,000.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:



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 3

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	LPL FINANCIAL, LLC
Allegations:	CLAIMANTS ALLEGE UNSUITABLE INVESTMENTS, BORROWING FROM CUSTOMERS, PRIVATE SECURITIES TRANSACTIONS, AND FAILURE TO SUPERVISE WITH RESPECT TO PROMISSORY NOTES PROVIDED BY MR. BASHAW AND MR. BASHAW'S RECOMMENDING INVESTMENTS IN TEXAS AIR SHUTTLE, LLC. ACTIVITY PERIOD 12/18/09 - 5/1/15.
Product Type:	Promissory Note Other: PRIVATE SECURITIES TRANSACTION
Alleged Damages:	\$3,800,000.00
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 #:	16-02452
Filing date of arbitration/CFTC reparation or civil litigation:	08/18/2016

Customer Complaint Information

Date Complaint Received:	09/02/2016
Complaint Pending?	No
Status:	Settled
Status Date:	11/30/2017
Settlement Amount:	\$1,900,000.00
Individual Contribution Amount:	\$0.00

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Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	LPL FINANCIAL, LLC
Allegations:	CLAIMANTS ALLEGE UNSUITABLE INVESTMENTS, BORROWING FROM



CUSTOMERS, PRIVATE SECURITIES TRANSACTIONS, AND FAILURE TO SUPERVISE WITH RESPECT TO PROMISSORY NOTES PROVIDED BY MR. BASHAW AND MR. BASHAWS RECOMMENDING INVESTMENTS IN TEXAS AIR SHUTTLE, LLC. ACTIVITY PERIOD 12/18/09-5/1/15.

Product Type: Futures-Financial
Promissory Note
Other: PRIVATE SECURITIES TRANSACTIONS

Alleged Damages: \$3,800,000.00

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 #: 16-02452

Filing date of arbitration/CFTC reparation or civil litigation: 08/18/2016

Customer Complaint Information

Date Complaint Received: 09/02/2016

Complaint Pending? No

Status: Settled

Status Date: 11/30/2017

Settlement Amount: \$1,900,000.00

Individual Contribution Amount: \$0.00

Broker Statement The [CUSTOMER NAME] parties never complained, suggested, or accused FA of unsuitable investments or private securities transactions until LPL Financial submitted and issued defamatory statements to FINRA and the media in September of 2014. FA did not recommend any investment in Texas Air Shuttle and the multi-million-dollar sophisticated lender invested in FA's company (and several unrelated companies and enterprises) in the regular course of its business in the pursuit of above-market gains over a course of 15 years or more. FA repaid hundreds of thousands of dollars on the notes between 2011 and his termination by LPL Financial. LPL Financial belatedly used the [CUSTOMER NAME] business loan, that its President [THIRD PARTY NAME] approved and that FA disclosed to LPL Financial auditors years before his termination, in order to terminate him and seize his employees, representatives, and clients. In doing so, LPL Financial prevented FA from fully satisfying his obligations to a highly sophisticated long-time friend and LPL Financial client that LPL Financial itself injured with its strategic termination of FA without just cause or notice. FA's Company never denied its repayment obligations and it made substantial ongoing payments until LPL Financial destroyed FA's Company.



Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: LPL FINANCIAL

Allegations: THAT UITS PURCHASED IN 2011 WERE UNSUITABLE.

Product Type: Unit Investment Trust

Alleged Damages: \$20,804.28

Is this an oral complaint? No

Is this a written complaint? Yes

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

Customer Complaint Information

Date Complaint Received: 04/26/2012

Complaint Pending? No

Status: Settled

Status Date: 07/31/2012

Settlement Amount: \$10,000.00

Individual Contribution Amount: \$10,000.00

Disclosure 3 of 3

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: KIDDER PEABODY & CO.

Allegations: BREACH OF FIDUCIARY DUTY-CHURNING, OJBECTIVES NOT FOLLOWED CLAIM-\$620,000 ACTUAL \$1,000,000. PUNITIVE

Product Type:

Alleged Damages: \$620,000.00

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 Association of Securities Dealers, Inc.; 89-1613



Date Notice/Process Served: 06/28/1988
Arbitration Pending? No
Disposition: Settled
Disposition Date: 12/01/1990
Monetary Compensation Amount: \$200,000.00
Individual Contribution Amount: \$0.00
Firm Statement KIDDER, PEABODY PAID \$200,000. IN SETTLEMENT PREVIOUSLY REPORTED AS A WRITTEN CUSTOMER COMPLAINT FILED WITH KIDDER, PEABODY ON 06/28/883

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Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: KIDDER PEABODY & CO.
Allegations: BREACH OF FIDUCIARY DUTY, CHURNING OBJECTIVES NOT FOLLOWED. CLAIM \$620,000 ACTUAL DAMAGES AND \$1,000,000 PUNITIVE DAMAGES.
Product Type: Other
Alleged Damages: \$620,000.00

Customer Complaint Information

Date Complaint Received: 06/28/1988
Complaint Pending? No
Status: Arbitration/Reparation
Status Date: 01/07/1991
Settlement Amount:
Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.; 89-1613
Date Notice/Process Served: 06/28/1988
Arbitration Pending? No
Disposition: Settled
Disposition Date: 12/01/1990
Monetary Compensation Amount: \$200,000.00
Individual Contribution Amount: \$0.00
Broker Statement KIDDER PEABODY SETTLED THE CLAIM FOR \$200,000 PRIOR TO ARBITRATION. [CUSTOMER] WAS LONG TIME FAMILY FRIEND AND CLIENT.



HE OWNED A SEAT ON THE MEXICAN STOCK MARKET, VOLKSWAGEN DEALERSHIPS, RANCHES, BANKS, AND HOTELS. ON OCTOBER 19, 1987 HIS ACCOUNT WAS HEAVILY MNARGINED AND SUFFERED A DROP IN MARKET VALUE DUE TO BLACK MONDAY. HE REFUSED TO COVER AND THE FIRM SOLD OUT HIS POSITIONS TO COVER HIS MARGION CALL. SUBSEQUENTLY, HE FILE SUIT AND FORGOT HE KNEW HOW TO SPEAK ENGLISH.



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: Firm

Firm Name: LPL FINANCIAL LLC

Termination Type: Discharged

Termination Date: 09/24/2014

Allegations: REPRESENTATIVE DISCHARGED FOR (A) PARTICIPATING IN PRIVATE SECURITIES TRANSACTIONS WITHOUT PROVIDING WRITTEN DISCLOSURE TO AND OBTAINING WRITTEN APPROVAL FROM THE FIRM, (B) BORROWING FROM A CLIENT, AND (C) ENGAGING IN A BUSINESS TRANSACTION THAT CREATED A POTENTIAL CONFLICT OF INTEREST WITHOUT PROVIDING WRITTEN DISCLOSURE TO AND OBTAINING WRITTEN APPROVAL FROM THE FIRM.

Product Type: Mutual Fund
Other: PRIVATE PLACEMENTS

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Reporting Source: Individual

Firm Name: LPL FINANCIAL

Termination Type: Discharged

Termination Date: 09/24/2014

Allegations: FAILURE TO FOLLOW FIRM POLICIES AND INDUSTRY REGULATIONS

Product Type: No Product

Broker Statement FA Bashaw contests the accuracy, validity, and motive for the purported reasons for termination. As such, FA Bashaw has brought a legal action against LPL Financial and its President, Mark S. Casady, alleging misrepresentation, defamation, raiding, breach of fiduciary duty, and business interference. FA Bashaw is also seeking expungement of this disclosure. The loans at issue were verbally approved by LPL Financial's President, Mark S. Casady, and were issued to FA Bashaw's Company by a multi-million-dollar lender Blackwell (and BPM Investments, Inc.) that invested in various entities in its regular course of business. The loans were disclosed to LPL Financial during LPL's routine audit of JebCo. in 2011 - 2012. LPL Financial's home office supervised FA Bashaw and all of the transactions at issue were conducted through LPL's e-mail server and information concerning the transactions was available for review during multiple internal LPL Financial audits. FA Bashaw did not engage in any private securities transactions. Moreover, the transactions at issue were non-compensatory. Tellingly, LPL Financial did not offer recession to any investors in accord with industry standards. Any alleged potential conflict of interest three years prior to the termination was facilitated by LPL Financial and its President, to their benefit. Finally, there were no customer complaints for any of the above and LPL Financial avoided asking FA Bashaw a single question before or after the termination, even though FA Bashaw was with President Mark S. Casady's at his home on Cape Cod just weeks before the termination.



Financial

This disclosure event involves a final bankruptcy, compromise with one or more creditors, or Securities Investor Protection Corporation liquidation that occurred within the last 10 years and that involved the Investment Adviser Representative or an organization/investment adviser that the Investment Adviser Representative controlled that occurred within the last 10 years.

Disclosure 1 of 1

Reporting Source: Individual
Action Type: Bankruptcy
Bankruptcy: Chapter 11
Action Date: 11/29/2017

Organization Investment-Related?

Type of Court: Federal Court
Name of Court: UNITED STATES BANKRUPTCY COURT
Location of Court: SOUTHERN DISTRICT OF TEXAS, HOUSTON
Docket/Case #: 17-36431
Action Pending? Yes



Judgment/Lien

This disclosure event involves an unsatisfied and outstanding judgment or lien against the Investment Adviser Representative.

Disclosure 1 of 1

Reporting Source:	Individual
Judgment/Lien Holder:	BLACKWELL MANAGEMENT TRUST OF 2009
Judgment/Lien Amount:	\$1,900,000.00
Judgment/Lien Type:	Civil
Date Filed with Court:	02/10/2017
Date Individual Learned:	02/10/2017
Type of Court:	Federal Court
Name of Court:	DISTRICT COURT OF HARRIS COUNTY
Location of Court:	HARRIS COUNTY, TEXAS
Docket/Case #:	2016-27497
Judgment/Lien Outstanding?	Yes



End of Report

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