



IAPD Report

JOEL REID BLUMENSCHEN

CRD# 1372334

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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

JOEL REID BLUMENSCHEN (CRD# 1372334)

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 **04/25/2024**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	KCD FINANCIAL, INC.	CRD# 127473	04/29/2010
IA	KCD FINANCIAL, INC.	CRD# 127473	05/19/2010

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **7** 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	FREEDOM INVESTORS CORP.	23714	Brookfield, WI	02/19/2013 - 12/31/2020
B	FREEDOM INVESTORS CORP.	23714	BROOKFIELD, WI	11/04/2002 - 08/28/2017
B	EZ STOCKS, INC.	103866	BROOKFIELD, WI	11/24/2000 - 09/23/2012

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	1
Judgment/Lien	2



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

Employment 1 of 1

Firm Name: **KCD FINANCIAL, INC.**

Main Address: 3061 ALLIED STREET
SUITE B
GREEN BAY, WI 54304

Firm ID#: 127473

Regulator	Registration	Status	Date
B FINRA	General Securities Principal	Approved	04/29/2010
B FINRA	General Securities Representative	Approved	04/29/2010
B FINRA	Investment Banking Representative	Approved	04/29/2010
B FINRA	Registered Options Principal	Approved	04/29/2010
B FINRA	Operations Professional	Approved	10/25/2011
B FINRA	Investment Banking Principal	Approved	10/01/2018
B FINRA	Introducing BD/Finan Operation Principal	Approved	02/04/2019
B California	Agent	Approved	06/12/2017
IA California	Investment Adviser Representative	Approved - Pending IAR CE	01/01/2026
B Florida	Agent	Approved	07/18/2017
IA Florida	Investment Adviser Representative	Approved - Pending IAR CE	01/01/2026
B Illinois	Agent	Approved	02/18/2020



Qualifications

Regulator	Registration	Status	Date
B Indiana	Agent	Approved	08/09/2017
B Texas	Agent	Approved	05/19/2010
IA Texas	Investment Adviser Representative	Approved	05/19/2010
IA Washington	Investment Adviser Representative	Approved	05/25/2010
B Washington	Agent	Approved	09/27/2017
B Wisconsin	Agent	Approved	07/18/2017
IA Wisconsin	Investment Adviser Representative	Approved - Pending IAR CE	01/01/2026

Branch Office Locations

KCD FINANCIAL, INC.
2717 N Grandview Blvd, Suite 203
Waukesha, WI 53188



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

Principal/Supervisory Exams

Exam	Category	Date
 Introducing Broker/Dealer Financial Operations Principal Examination (S28)	Series 28	02/04/2019
 Registered Options Principal Examination (S4)	Series 4	08/11/1987
 General Securities Principal Examination (S24)	Series 24	01/28/1987

General Industry/Product Exams

Exam	Category	Date
 Operations Professional Examination (S99TO)	Series 99TO	01/02/2023
 Investment Banking Registered Representative Examination (S79TO)	Series 79TO	01/02/2023
 Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
 General Securities Representative Examination (S7)	Series 7	06/15/1985

State Securities Law Exams

Exam	Category	Date
 Uniform Investment Adviser Law Examination (S65)	Series 65	07/22/1996
 Uniform Securities Agent State Law Examination (S63)	Series 63	06/25/1985



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	02/19/2013 - 12/31/2020	FREEDOM INVESTORS CORP.	CRD# 23714	Brookfield, WI
B	11/04/2002 - 08/28/2017	FREEDOM INVESTORS CORP.	CRD# 23714	BROOKFIELD, WI
B	11/24/2000 - 09/23/2012	EZ STOCKS, INC.	CRD# 103866	BROOKFIELD, WI
B	09/06/1996 - 11/28/2000	LISS FINANCIAL SERVICES	CRD# 21950	MILWAUKEE, WI
B	09/01/1994 - 09/06/1996	PRINCIPAL FINANCIAL SECURITIES, INC.	CRD# 260	DALLAS, TX
B	01/11/1991 - 09/01/1994	HAMILTON INVESTMENTS, INC.	CRD# 821	
B	09/11/1990 - 01/09/1991	WHITEHOUSE & MOORE INVESTMENTS, INC.	CRD# 24738	
B	06/19/1985 - 10/18/1990	BLINDER, ROBINSON & CO., INC.	CRD# 5096	

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
04/2010 - Present	KCD FINANCIAL INC	OWNER/PRINCIPAL	Y	Green Bay, WI, United States
09/2002 - 12/2020	FREEDOM INVESTORS CORP (RIA)	GENERAL SECURITIES PRINCIPAL	Y	HARTLAND, WI, United States
09/2002 - 08/2017	FREEDOM INVESTORS CORP	GENERAL SECURITIES PRINCIPAL	Y	HARTLAND, WI, 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.

BUSINESS NAME: FREEDOM SECURITIES, INC.

INVESTMENT RELATED: NO,

ADDRESS - 2717 N Grandview Blvd, Suite 203, Waukesha, WI 53188

NATURE: PARENT COMPANY,

POSITION OR TITLE: PRESIDENT AND DIRECTOR,

START DATE: 2002,

OF HOURS: 0 HOURS PER WEEK, (5 HOURS PER WEEK DURING TRADING),

DUTIES: OFFICER RELATED DUTIES.

BUSINESS NAME: KCD FINANCIAL, INC.

INVESTMENT RELATED: YES,

ADDRESS - 3061 Allied St. Suite B Green Bay, WI 54304,

NATURE AND POSITION: BROKER/DEALER-CEO,

POSITION OR TITLE: GENERAL SECURITIES PRINCIPAL,

START DATE: APRIL, 2010,

OF HOURS: 200+HOURS PER MONTH, (100 HOUR PER MONTH DURING TRADING),

DUTIES: OFFICER AND EXECUTIVE FUNCTIONS.



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	1
Judgment/Lien	2

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:	Other: N/A
Date Initiated:	04/03/2012
Docket/Case Number:	2010025132201
Employing firm when activity occurred which led to the regulatory action:	FREEDOM INVESTORS CORP.
Product Type:	Penny Stock
Allegations:	FINRA RULE 2010, NASD RULE 3010 - JOEL BLUMENSCHEN WAS DESIGNATED IN HIS MEMBER FIRM'S WRITTEN SUPERVISORY PROCEDURES AS A REGISTERED PRINCIPAL'S SUPERVISOR AND ACTING ON BEHALF OF THE FIRM, WAS RESPONSIBLE FOR REVIEWING HER ACTIVITY. THE PRINCIPAL, ON BEHALF OF THE FIRM SENT CORRESPONDENCE TO A CUSTOMER REGARDING A COMPLAINT PROPOSING A SETTLEMENT ALTHOUGH SHE IS NOT AN ATTORNEY AND HAD NO PRIOR EXPERIENCE NEGOTIATING SETTLEMENTS. BLUMENSCHEN DID NOT REVIEW HER LETTERS NOR DID HE REVIEW HER LETTER TO THE CUSTOMER INCORPORATING THE FORMAL SETTLEMENT AGREEMENT. AFTER SHE WAS TOLD BY FINRA THAT THE SETTLEMENT AGREEMENT VIOLATED FINRA RULES, SHE NEGOTIATED A REVISED AGREEMENT WITH THE CUSTOMER WHICH ELIMINATED THE VIOLATIVE PROVISIONS; BLUMENSCHEN ALLOWED HER TO DRAFT AND SIGN THE



REVISED AGREEMENT WITHOUT REVIEWING THE DOCUMENT. BECAUSE OF PRIOR CUSTOMER COMPLAINTS AND THE CONCERNS OF A STATE REGULATOR, BLUMENSCHEN'S FIRM PLACED A REGISTERED REPRESENTATIVE ON HEIGHTENED SUPERVISION WHEN HE JOINED THE FIRM; BLUMENSCHEN WAS RESPONSIBLE FOR REVIEWING AND SUPERVISING THE REPRESENTATIVE'S ACTIVITY, INCLUDING A DAILY REVIEW AND APPROVAL OF ALL TRANSACTIONS AND NEW ACCOUNT DOCUMENTS. BLUMENSCHEN DID NOT REVIEW TRANSACTIONS IN A CUSTOMER'S ACCOUNT IN RELATION TO THE CUSTOMER'S FINANCIAL SITUATION OR INVESTMENT OBJECTIVES, MADE NO CUSTOMER-SPECIFIC SUITABILITY ANALYSIS, AND DID NOT IDENTIFY ANY TRANSACTION IN THE ACCOUNT AS CAUSE FOR HEIGHTENED SECURITY. BLUMENSCHEN CONCEDED DURING A FINRA INVESTIGATION THAT CERTAIN PENNY STOCKS WERE NOT SUITABLE FOR THE CUSTOMER. WHILE THE REGISTERED REPRESENTATIVE WAS EFFECTING TRADES IN THE CUSTOMER'S ACCOUNT, BLUMENSCHEN NEVER QUESTIONED OR DOCUMENTED ANY CONCERN ABOUT ANY TRANSACTIONS IN THE ACCOUNT. THE MEMBER FIRM, ACTING THROUGH BLUMENSCHEN, FAILED TO DESIGN AND IMPLEMENT A SYSTEM TO REASONABLY SUPERVISE CUSTOMER TRANSACTIONS EFFECTED BY THE FIRM'S REGISTERED REPRESENTATIVES. THE FIRM SUPERVISED TRANSACTIONS PRIMARILY BY MEANS OF BLUMENSCHEN'S PERIODIC REVIEW OF A DAILY ORDER ACTIVITY REPORT SUPPLIED BY THE FIRM'S CLEARING FIRM. BLUMENSCHEN USED THE REPORT TO IDENTIFY TRANSACTIONS HE CALLED OUTLIERS, INCLUDING TRANSACTIONS IN STOCKS UNFAMILIAR TO HIM, USUALLY LARGE PURCHASES AND TRADES AWAY FROM THE MARKET, AND DEALT WITH THEM, IF AT ALL, IN AN AD HOC FASHION, WITHOUT DOCUMENTING EITHER THE IDENTIFIED TRANSACTIONS OR THE RESOLUTION, IF ANY, OF HIS CONCERN. AFTER PROVIDING CONTRADICTORY TESTIMONY, BLUMENSCHEN TOLD FINRA THAT HE DID NOT ACCESS THE PENNY STOCK TRANSACTION REPORT THAT COULD ASSIST A SUITABILITY ANALYSIS OF PENNY STOCK TRANSACTIONS BECAUSE IT INCLUDED CUSTOMER'S NAMES, INVESTMENT PROFILES AND WHETHER TRADES WERE SOLICITED OR UNSOLICITED.

Current Status:

Final

Resolution:

Decision & Order of Offer of Settlement

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:

04/23/2012

Sanctions Ordered:Civil and Administrative Penalty(ies)/Fine(s)
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 of such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Sanction 1 of 1

Sanction Type: Suspension

Capacities Affected: ANY PRINCIPAL CAPACITY

Duration: THREE MONTHS

Start Date: 05/21/2012



End Date:	08/20/2012	
Monetary Sanction 1 of 1		
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)	
Total Amount:	\$30,000.00	
Portion Levied against individual:	\$30,000.00	
Payment Plan:		
Is Payment Plan Current:		
Date Paid by individual:	05/13/2014	
Was any portion of penalty waived?	No	
Amount Waived:		
Regulator Statement	COMPLAINT FILED: SEPTEMBER 22, 2011 WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, BLUMENSCHEN CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, HE IS FINED \$30,000, JOINTLY AND SEVERALLY, AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY PRINCIPAL CAPACITY FOR THREE MONTHS. THE SUSPENSION IS IN EFFECT FROM MAY 21, 2012 THROUGH AUGUST 20, 2012. FINE PAID IN FULL ON MAY 13, 2014.	-----
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Reporting Source:	Individual	
Regulatory Action Initiated By:	FINRA	
Sanction(s) Sought:	Other: N/A	
Date Initiated:	04/03/2012	
Docket/Case Number:	2010025132201	
Employing firm when activity occurred which led to the regulatory action:	FREEDOM INVESTORS CORP	
Product Type:	Penny Stock	
Allegations:	FINRA RULE 2010, NASD RULE 3010 - JOEL BLUMENSCHEN WAS DESIGNATED IN HIS MEMBER FIRM'S WRITTEN SUPERVISORY PROCEDURES AS A REGISTERED PRINCIPAL'S SUPERVISOR AND ACTING ON BEHALF OF THE FIRM, WAS RESPONSIBLE FOR REVIEWING HER ACTIVITY. THE PRINCIPAL, ON BEHALF OF THE FIRM SENT CORRESPONDENCE TO A CUSTOMER REGARDING A COMPLAINT PROPOSING A SETTLEMENT ALTHOUGH SHE IS NOT AN ATTORNEY AND HAD NO PRIOR EXPERIENCE NEGOTIATING SETTLEMENTS. BLUMENSCHEN DID NOT REVIEW HER LETTERS NOR DID HE REVIEW HER LETTER TO THE CUSTOMER INCORPORATING THE FORMAL SETTLEMENT AGREEMENT. AFTER SHE WAS TOLD BY FINRA THAT THE SETTLEMENT AGREEMENT VIOLATED FINRA RULES, SHE NEGOTIATED A REVISED AGREEMENT WITH THE CUSTOMER WHICH ELIMINATED THE VIOLATIVE PROVISIONS; BLUMENSCHEN ALLOWED HER TO DRAFT AND SIGN THE REVISED AGREEMENT WITHOUT REVIEWING THE DOCUMENT. BECAUSE	



OF PRIOR CUSTOMER COMPLAINTS AND THE CONCERNS OF A STATE REGULATOR, BLUMENSCHEN'S FIRM PLACED A REGISTERED REPRESENTATIVE ON HEIGHTENED SUPERVISION WHEN HE JOINED THE FIRM; BLUMENSCHEN WAS RESPONSIBLE FOR REVIEWING AND SUPERVISING THE REPRESENTATIVE'S ACTIVITY, INCLUDING A DAILY REVIEW AND APPROVAL OF ALL TRANSACTIONS AND NEW ACCOUNT DOCUMENTS. BLUMENSCHEN DID NOT REVIEW TRANSACTIONS IN A CUSTOMER'S ACCOUNT IN RELATION TO THE CUSTOMER'S FINANCIAL SITUATION OR INVESTMENT OBJECTIVES, MADE NO CUSTOMER-SPECIFIC SUITABILITY ANALYSIS, AND DID NOT IDENTIFY ANY TRANSACTION IN THE ACCOUNT AS CAUSE FOR HEIGHTENED SECURITY. BLUMENSCHEN CONCEDED DURING A FINRA INVESTIGATION THAT CERTAIN PENNY STOCKS WERE NOT SUITABLE FOR THE CUSTOMER. WHILE THE REGISTERED REPRESENTATIVE WAS EFFECTING TRADES IN THE CUSTOMER'S ACCOUNT, BLUMENSCHEN NEVER QUESTIONED OR DOCUMENTED ANY CONCERNS ABOUT ANY TRANSACTIONS IN THE ACCOUNT. THE MEMBER FIRM, ACTING THROUGH BLUMENSCHEN, FAILED TO DESIGN AND IMPLEMENT A SYSTEM TO REASONABLY SUPERVISE CUSTOMER TRANSACTIONS EFFECTED BY THE FIRM'S REGISTERED REPRESENTATIVES. THE FIRM SUPERVISED TRANSACTIONS PRIMARILY BY MEANS OF BLUMENSCHEN'S PERIODIC REVIEW OF A DAILY ORDER ACTIVITY REPORT SUPPLIED BY THE FIRM'S CLEARING FIRM. BLUMENSCHEN USED THE REPORT TO IDENTIFY TRANSACTIONS HE CALLED OUTLIERS, INCLUDING TRANSACTIONS IN STOCKS UNFAMILIAR TO HIM, USUALLY LARGE PURCHASES AND TRADES AWAY FROM THE MARKET, AND DEALT WITH THEM, IF AT ALL, IN AN AD HOC FASHION, WITHOUT DOCUMENTING EITHER THE IDENTIFIED TRANSACTIONS OR THE RESOLUTION, IF ANY, OF HIS CONCERNS. AFTER PROVIDING CONTRADICTORY TESTIMONY, BLUMENSCHEN TOLD FINRA THAT HE DID NOT ACCESS THE PENNY STOCK TRANSACTION REPORT THAT COULD ASSIST A SUITABILITY ANALYSIS OF PENNY STOCK TRANSACTIONS BECAUSE IT INCLUDED CUSTOMER'S NAMES, INVESTMENT PROFILES AND WHETHER TRADES WERE SOLICITED OR UNSOLICITED.

Current Status:	Final
Resolution:	Decision & Order of Offer of Settlement
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:	04/23/2012
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	ANY PRINCIPAL CAPACITY
Duration:	THREE MONTHS
Start Date:	05/21/2012
End Date:	08/20/2012
Monetary Sanction 1 of 1	



Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$30,000.00
Portion Levied against individual:	\$30,000.00
Payment Plan:	
Is Payment Plan Current:	
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	
Broker Statement	BLUMENSCHEN AGREED TO THE AWC AS STATED TO BRING CLOSURE TO AN ALOMST 2 YEAR INVESTIGATION. SETTLED WIHOUT ADMITTING OR DENYING THE ALLEGATIONS AND CHARGES.



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 1

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	Freedom Investors Corporation
Allegations:	Alleged churning and unsuitable investments throughout the account existence 2013-2016.
Product Type:	Debt-Corporate Debt-Municipal Equity-OTC Equity Listed (Common & Preferred Stock) Money Market Fund Mutual Fund Options Promissory Note
Alleged Damages:	\$0.00
Alleged Damages Amount Explanation (if amount not exact):	No damage amount has been alleged
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:	12/29/2016
Complaint Pending?	No
Status:	Denied
Status Date:	11/28/2018

Settlement Amount: \$0.00

Individual Contribution Amount:

Arbitration Information

Disposition:	Denied
Disposition Date:	11/28/2018
Broker Statement	Long term accredited client who knew exactly everything in her trust account, passed away. New trustee who also knew everything in the trust, is now trying to see if he can stir up problems and justify his fees to the trust. I categorically deny all accusations.



Emails directing the Rep to complete these transactions were reviewed from the Trustee. Claim denied.



Judgment/Lien

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

Disclosure 1 of 2

Reporting Source: Individual
Judgment/Lien Holder: Emergency Medical Associates LLP
Judgment/Lien Amount: \$773.49
Judgment/Lien Type: Civil
Date Filed with Court: 04/13/2022
Date Individual Learned: 05/23/2022
Type of Court: State Court
Name of Court: WISCONSIN CIRCUIT COURT
Location of Court: Waukesha County WI
Docket/Case #: 2022SC000653
Judgment/Lien Outstanding? Yes

Disclosure 2 of 2

Reporting Source: Individual
Judgment/Lien Holder: IRS
Judgment/Lien Amount: \$106,083.14
Judgment/Lien Type: Tax
Date Filed with Court: 08/16/2017
Date Individual Learned: 09/12/2018
Type of Court: County Court
Name of Court: Waukesha County
Location of Court: Waukesha County, WI
Docket/Case #: 4294421
Judgment/Lien Outstanding? Yes
Broker Statement This lien is dispute with the IRS.



End of Report

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