



IAPD Report

STEVEN DOMINIC ARRIGAN

CRD# 1382032

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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

STEVEN DOMINIC ARRIGAN (CRD# 1382032)

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 **03/21/2023**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	GENEOS WEALTH MANAGEMENT, INC.	CRD# 120894	01/03/2006
IA	GENEOS WEALTH MANAGEMENT, INC.	CRD# 120894	01/03/2023

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **22** 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	STURNIOLO JOSEPH S & ASSOCIATES INC	107609	DENVER, CO	02/18/2003 - 02/27/2023
IA	FIRST ALLIED SECURITIES, INC.	32444	DENVER, CO	11/13/2003 - 01/04/2006
B	FIRST ALLIED SECURITIES, INC.	32444	DENVER, CO	09/28/2000 - 01/04/2006

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



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

Employment 1 of 1

Firm Name: **GENEOS WEALTH MANAGEMENT, INC.**
Main Address: 9635 MAROON CIRCLE
SUITE 100
ENGLEWOOD, CO 80112
Firm ID#: 120894

	Regulator	Registration	Status	Date
B	FINRA	General Securities Principal	Approved	01/03/2006
B	FINRA	General Securities Representative	Approved	01/03/2006
B	FINRA	Invest. Co and Variable Contracts	Approved	01/03/2006
B	FINRA	Investment Co./Variable Contracts Prin	Approved	01/03/2006
B	Arizona	Agent	Approved	01/03/2006
B	California	Agent	Approved	01/03/2006
B	Colorado	Agent	Approved	01/03/2006
IA	Colorado	Investment Adviser Representative	Approved	01/03/2023
B	Florida	Agent	Approved	01/03/2006
B	Hawaii	Agent	Approved	01/03/2006
B	Idaho	Agent	Approved	10/11/2007
B	Minnesota	Agent	Approved	07/01/2015
B	Montana	Agent	Approved	10/24/2014



Qualifications

Regulator	Registration	Status	Date
B Nevada	Agent	Approved	01/03/2006
B New Hampshire	Agent	Approved	01/03/2006
B New Jersey	Agent	Approved	01/03/2006
B New Mexico	Agent	Approved	01/03/2006
B New York	Agent	Approved	09/12/2006
B North Carolina	Agent	Approved	01/03/2006
B Ohio	Agent	Approved	01/04/2016
B Oregon	Agent	Approved	12/05/2008
B Rhode Island	Agent	Approved	02/08/2021
B Tennessee	Agent	Approved	01/03/2006
B Texas	Agent	Approved	01/03/2006
B Utah	Agent	Approved	01/03/2006
B Washington	Agent	Approved	01/03/2006
B Wyoming	Agent	Approved	01/03/2006

Branch Office Locations

GENEOS WEALTH MANAGEMENT, INC.
 7535 EAST HAMPDEN AVENUE
 SUITE 225
 DENVER, CO 80231

GENEOS WEALTH MANAGEMENT, INC.
 4450 ARAPAHOE AVE
 SUITE #100
 BOULDER, CO 80303

GENEOS WEALTH MANAGEMENT, INC.
 4045 Wadsworth Blvd
 Suite 306
 Wheat Ridge, CO 80033





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



Principal/Supervisory Exams

Exam	Category	Date
 General Securities Principal Examination (S24)	Series 24	07/02/1998
 Investment Company Products/Variable Contracts Principal Examination (S26)	Series 26	05/05/1989

General Industry/Product Exams

Exam	Category	Date
 Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
 General Securities Representative Examination (S7)	Series 7	12/14/1993
 Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	11/07/1986

State Securities Law Exams

Exam	Category	Date
 Uniform Investment Adviser Law Examination (S65)	Series 65	01/28/1999
 Uniform Securities Agent State Law Examination (S63)	Series 63	05/23/1986

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	02/18/2003 - 02/27/2023	STURNIOLO JOSEPH S & ASSOCIATES INC	CRD# 107609	DENVER, CO
IA	11/13/2003 - 01/04/2006	FIRST ALLIED SECURITIES, INC.	CRD# 32444	DENVER, CO
B	09/28/2000 - 01/04/2006	FIRST ALLIED SECURITIES, INC.	CRD# 32444	DENVER, CO
B	05/22/2000 - 10/26/2000	D.E. FREY & COMPANY, INC.	CRD# 23595	DENVER, CO
B	11/12/1986 - 12/07/1999	THE DREYFUS SERVICE CORPORATION	CRD# 231	NEW YORK, NY

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
01/2006 - Present	GENEOS WEALTH MANAGEMENT INC	REGISTERED REP / IAR	Y	DENVER, CO, United States
01/2006 - Present	JOSEPH S STURNIOLO & ASSOCIATES, INC.	DBA	N	DENVER, CO, 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) DBA: WILL WORK UNDER JOSEPH S STURNIOLO & ASSOCIATES INC BUSINESS LOCATED AT BRANCH LOCATION.



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

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:	Colorado Division of Securities
Sanction(s) Sought:	Censure Other: Restricted License for three (3) years
Date Initiated:	05/27/2022
Docket/Case Number:	2022-CDS-004
URL for Regulatory Action:	https://securities.colorado.gov/enforcement-actions
Employing firm when activity occurred which led to the regulatory action:	Sturniolo Joseph S & A Associates, Inc., IARD No. 107609

Product Type: No Product

Allegations: Failure to cure some of the required deficiencies specified in a letter issued by the Staff of the Division of Securities ("Division") on June 16, 2013, following the 2013 examination of books and records maintained by Sturniolo Joseph S & A Associates, Inc., IARD No. 107609 ("Sturniolo IA Firm"). The Sturniolo IA firm failed to update and failed to deliver its Form ADV Part 2 ("Firm Brochure") and individual representatives Part 2B ("Brochure Supplement") to clients and prospective clients since at least 2013 in violation of Rule 51-4.7(IA)(A.). Failure to deliver the Firm Brochure and the Brochure Supplement violated Rule 51-4.8(IA)(K.) because material information was not disclosed to clients. Specifically, Sturniolo and Arrigan did not disclose the IA Firm and its representatives accepted compensation for the sale of insurance and securities and that this practice represents a material conflict of interest and creates an incentive to recommend products based on the compensation received and not the best interests of the client. Sturniolo was subject to a 2020 customer complaint by a client (the "2020 complaint") and a 2019 complaint by a client (the "2019 complaint"). The 2019



complaint was made against Sturniolo in his capacity as a registered representative with Geneos Wealth Management, Inc., CRD No. 120894 ("Geneos"), and the 2020 complaint was made against Geneos and did not name Sturniolo as a party to the complaint. Since the customer complaints were not disclosed on the IA firm's disclosure documents and the disclosure documents were not delivered, existing clients and potential clients of the IA Firm did not receive notice of the 2020 complaint or the 2019 complaint from the Sturniolo IA Firm as required by the Colorado Securities Act (the "Act") and rules under the Act. Both the 2020 and 2019 complaints have been found by an arbitration panel to be false, factually impossible, and clearly erroneous allegations, and have since been expunged from Sturniolo's record. The Sturniolo IA Firm also misrepresented to clients that services provided from the independent Sturniolo IA Firm were being provided through Geneos, and not their independent state investment adviser. The Sturniolo IA Firm's advisory contract identified Sturniolo and Arrigan as investment adviser representatives of Geneos and did not contain adequate information in violation of Rule 51-4.8(IA)(P). The Sturniolo IA Firm failed to timely file its annual updating amendments for fiscal year 2008 to 2018 and has currently not filed for fiscal years 2019 and 2020 as required by Rule 51- 4.3(IA)(G). By entering into a Stipulation, Sturniolo and Arrigan neither admit nor deny the Staff's allegations contained in the Stipulation.

Current Status:

Final

Resolution:

Stipulation and Consent

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:

12/30/2022

Sanctions Ordered:

Censure
 Other: Licensing restrictions include: (1.) Withdrawal of the Colorado license for Sturniolo Joseph S & A Associates, Inc., IARD No. 107609 ("Sturniolo IA Firm"), Sturniolo's IAR license with the Sturniolo IA Firm, and Arrigan's IAR licenses with the Sturniolo IA Firm within sixty (60) days of receiving approval of Sturniolo and Arrigan's IAR licenses with Geneos Wealth Management, Inc. CRD No. 120894 ("Geneos"). (2.) Sturniolo and Arrigan will be placed on heightened supervision for a period of three (3) years following approval of their Geneos IAR licenses. Heightened supervision of Sturniolo and Arrigan shall apply to both the IAR and the sales representative licenses with Geneos. (3.) Heightened supervision of the licensees shall be governed by the Consent Order, the Registration Agreement for Sturniolo and Arrigan dated December 28, 2022 (the "Registration Agreement"), and the Supervisory Agreement for Geneos Wealth Management, Inc. dated December 30, 2022 (the "Supervisory Agreement") and shall include the following: (a.) Provision of a disclosure document to all Colorado clients of the Sturniolo IA Firm within thirty (30) days of the Division filing a Form U-6 for the Order on the Central Registration Depository/Investment Adviser Registration Depository ("CRD/IARD"). (b.) Geneos will conduct a minimum of two (2) surprise examinations of any Geneos branch office the licensees are associated with during the three (3) year period. (c.) The licensees must maintain a written journal/log of detailed notes of conversations and meetings with all clients that discuss and/or lead to investment recommendations, purchases, and/or sales of securities, investment, insurance, and banking products to clients. (d.) Geneos will conduct quarterly reviews of the licensees other business activities. See Consent Licensing Order 2022-CDS-004 dated December 30, 2022, for a complete list of restrictions.



Reporting Source:	Individual
Regulatory Action Initiated By:	State of Colorado
Sanction(s) Sought:	Censure
Date Initiated:	12/21/2022
Docket/Case Number:	Case No. 2022-CDS-004
Employing firm when activity occurred which led to the regulatory action:	Sturniolo Joseph & Associates Inc.
Product Type:	No Product
Allegations:	<p>The State of Colorado alleges that Sturniolo and Arrigan engaged in the following conduct at the Sturniolo IA Firm:</p> <p>Sturniolo and Arrigan failed to cure deficiencies specified in the letter issued by the Staff on 6/16/13. The Sturniolo IA firm has not updated and has failed to deliver its Form ADV Part 2 and individual representatives Part 2B to clients and prospective clients since at least 2013 in violation of Rule 51-4.7(IA)(A). Due to the failure to deliver, Sturniolo and Arrigan did not disclose material information to clients in violation of Rule 51-4.8(IA)(K). Specifically, they did not disclose that they accepted compensation for the sale of insurance and securities, nor did they disclose customer complaints from 2019 and 2020. Both the 2020 and 2019 complaints have been found by an arbitration panel to be false, factually impossible, and clearly erroneous allegations, and have since been expunged from Sturniolo's record. The Sturniolo IA Firm also misrepresented to clients that services provided from the independent Sturniolo IA Firm were being provided through Geneos, and not their independent state investment adviser. The Sturniolo IA Firm's advisory contract identified Sturniolo and Arrigan as investment adviser representatives of Geneos and did not contain adequate information in violation of Rule 51-4.8(IA)(P). The Sturniolo IA Firm failed to timely file its annual updating amendments for fiscal year 2008 to 2018 and has currently not filed for fiscal years 2019 and 2020 as required by Rule 51-4.3(IA)(G).</p>
Current Status:	Final
Resolution:	Order
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:	12/30/2022
Sanctions Ordered:	Censure
Broker Statement	<p>The two customer dispute disclosures were timely reported on my CRD, IARD, IAPD, and BrokerCheck records ("Registration Records") and publicly available to anyone viewing my Registration Records. These disclosures have since been expunged from my Registration Records after arbitration panels found the allegations to be false, clearly erroneous, and factually impossible allegations. The RIA also provided its Form ADV to its clients, but the Form ADV was not updated to include the customer dispute disclosures after they had been reported to my Registration Records.</p>



Regarding the Commission's allegation that the RIA misrepresented to clients that services provided from the RIA were being provided through Geneos instead, although clients were provided with the correct information, the Commission alleged it was misleading. Under Rule 51-4.8(IA)(P), "[t]he information required by Part 2 of Form ADV may be disclosed in a document other than the investment advisory contract, so long as it is disclosed at the time the contract is entered into, extended, or renewed." The RIA's clients were provided with the Form ADV which explained that advisory services were provided by the RIA firm. However, there were other agreements that clients entered into that referenced Geneos as a "third party money manager" and the "registered broker-dealer", which the Commission found to be misleading.

As a result of these allegations, I agreed, without admitting to the allegations, that I would withdraw the RIA license, join Geneos's platform as their RIA (and broker-dealer), and would have certain restrictions on my license, including being placed on heightened supervision.



End of Report

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