IAPD Report

ROBIN TOM NAYLOR

CRD# 1392433

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

ROBIN TOM NAYLOR (CRD# 1392433)

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 **06/17/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	EMERSON EQUITY LLC	CRD# 130032	05/22/2018
IA	SPRYLEN WEALTH MANAGEMENT, LLC	CRD# 297592	10/02/2018

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **6** 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	SANDLAPPER WEALTH MANAGEMENT, LLC	41534	KENT, WA	12/17/2014 - 07/09/2018
B	SANDLAPPER SECURITIES, LLC	137906	GREENVILLE, SC	10/14/2014 - 05/25/2018
IA	CENTAURUS FINANCIAL, INC.	30833	KENT, WA	01/25/2012 - 12/31/2012

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

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

Employment 1 of 2

Firm Name: **EMERSON EQUITY LLC**

Main Address: 155 BOVET ROAD, SUITE 725
SAN MATEO, CA 94402

Firm ID#: 130032

	Regulator	Registration	Status	Date
B	FINRA	General Securities Representative	Approved	05/22/2018
B	FINRA	Invest. Co and Variable Contracts	Approved	05/22/2018
B	Arizona	Agent	Approved	05/22/2018
B	California	Agent	Approved	05/22/2018
B	Idaho	Agent	Approved	06/17/2025
B	Utah	Agent	Approved	05/22/2018
B	Washington	Agent	Approved	05/22/2018
B	Wyoming	Agent	Approved	05/22/2018

Branch Office Locations

EMERSON EQUITY LLC
Kent, WA

Employment 2 of 2

Firm Name: **SPRYLEN WEALTH MANAGEMENT, LLC**

Main Address: KENT, WA

Firm ID#: 297592

Qualifications

	Regulator	Registration	Status	Date
IA	Washington	Investment Adviser Representative	Approved	10/02/2018

Branch Office Locations

SPRYLEN WEALTH MANAGEMENT, LLC
KENT, WA

SPRYLEN WEALTH MANAGEMENT, LLC
P.O. Box 7144
Covington, WA 98042

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

Principal/Supervisory Exams

	Exam	Category	Date
	No information reported.		

General Industry/Product Exams

	Exam	Category	Date
B	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
B	General Securities Representative Examination (S7)	Series 7	03/15/1986
B	Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	09/12/1985

State Securities Law Exams

	Exam	Category	Date
IA	Uniform Investment Adviser Law Examination (S65)	Series 65	06/11/1998
B	Uniform Securities Agent State Law Examination (S63)	Series 63	09/21/1988

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	12/17/2014 - 07/09/2018	SANDLAPPER WEALTH MANAGEMENT, LLC	CRD# 41534	KENT, WA
B	10/14/2014 - 05/25/2018	SANDLAPPER SECURITIES, LLC	CRD# 137906	GREENVILLE, SC
IA	01/25/2012 - 12/31/2012	CENTAURUS FINANCIAL, INC.	CRD# 30833	KENT, WA
B	01/23/2012 - 12/31/2012	CENTAURUS FINANCIAL, INC.	CRD# 30833	KENT, WA
IA	06/23/1998 - 01/24/2012	PACIFIC WEST FINANCIAL CONSULTANTS INC	CRD# 108728	COVINGTON, WA
B	03/19/1998 - 12/31/2011	PACIFIC WEST SECURITIES, INC.	CRD# 6390	KENT, WA
B	03/10/1993 - 12/16/1997	1717 CAPITAL MANAGEMENT COMPANY	CRD# 4082	NEWARK, DE
B	09/13/1985 - 11/20/1991	G. R. PHELPS & CO., INC.	CRD# 173	

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
06/2018 - Present	SPRYLEN WEALTH MANAGEMENT, LLC	OWNER / MANAGER	Y	KENT, WA, United States
05/2018 - Present	EMERSON EQUITY LLC	REGISTERED REPRESENTATIVE / FINANCIAL ADVISOR	Y	SAN MATEO, CA, United States
08/1991 - Present	NAYLOR INSURANCE & FINANCIAL SERVICES, INC.	OWNER - (DBA)	Y	Kent, WA, United States
01/2015 - 07/2018	SANDLAPPER WEALTH MANAGEMENT, LLC	IAR	Y	KENT, WA, United States
08/2014 - 05/2018	SANDLAPPER SECURITIES, LLC	FINANCIAL ADVISOR	Y	GREENVILLE, SC, 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.

1)SPRYLEN WEALTH MANAGEMENT, LLC, INVESTMENT-RELATED, 18331 SE 280TH STREET KENT, WA 98042; MANAGED MONEY AND FINCIAL PLANNING, OWNER / MANAGER AS OF JUNE 2018; 30-60 HOURS PER MONTH; MARKETING AND BUILDING A BOOK OF BUSINESS; ASSESSING RISK TOLERANCE, BUILDING PORTFOLIOS, MONITORING, CHANGING ALLOCATIONS AS LIFE CHANGING EVENTS DEVELOP.
2) NAYLOR INSURANCE & FINANCIAL SERVICES, INC. 18831 SE 280TH STREET KENT, WA 98042, SINCE 1994. SALES OF NON-VARIABLE INSURANCE PRODUCTS, THEREFORE, NON INVESTMENT REALTED AS PER INSURANCE INDUSTRY. LIFE AND FIXED AND FIXED INDEXED ANNUITIES ARE "SAVINGS PRODUCTS" MY ROLE IS SALES 30-60 HRS PER MONTH 8AM TO 5 PM PT.

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:	WASHINGTON
Sanction(s) Sought:	Cease and Desist Monetary Penalty other than Fines
Date Initiated:	01/15/2014
Docket/Case Number:	S-09-048-13-CO01
URL for Regulatory Action:	
Employing firm when activity occurred which led to the regulatory action:	
Product Type:	Investment Contract
Allegations:	ON JANUARY 27, 2014, THE SECURITIES DIVISION ENTERED INTO A CONSENT ORDER WITH ROBIN THOMAS NAYLOR ("RESPONDENT"). THE SECURITIES DIVISION ALLEGED THAT NAYLOR, WHILE EMPLOYED AS A SECURITIES SALESPERSON AND INVESTMENT ADVISER REPRESENTATIVE WITH PACIFIC WEST SECURITIES, MADE UNSUITABLE TENANT-IN-COMMON ("TIC") SALES TO AT LEAST TWO OF HIS CUSTOMERS BETWEEN 2007 AND 2008. THE SECURITIES DIVISION ALLEGED THAT IN OFFERING AND SELLING THE TIC INVESTMENTS, NAYLOR VIOLATED THE SUITABILITY SECTION OF THE SECURITIES ACT OF WASHINGTON. THE RESPONDENT NEITHER ADMITTED NOR DENIED THE ALLEGATIONS, BUT AGREED TO CEASE AND DESIST FROM VIOLATING THE SECURITIES ACT OF WASHINGTON. THE RESPONDENT AGREED TO PAY INVESTIGATIVE COSTS OF $2,500. THE RESPONDENT WAIVED HIS RIGHT TO A HEARING AND TO JUDICIAL REVIEW OF THIS MATTER.

Current Status:	Final
Resolution:	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:	01/15/2014
Sanctions Ordered:	Cease and Desist Monetary Penalty other than Fines Other: $2,500.00 INVESTIGATIVE FEES.
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	$2,500.00
Portion Levied against individual:	$2,500.00
Payment Plan:	NO
Is Payment Plan Current:	Yes
Date Paid by individual:	01/29/2014
Was any portion of penalty waived?	No
Amount Waived:	
Regulator Statement	BRIDGETT FISHER 360-902-8783

Reporting Source:	Individual
Regulatory Action Initiated By:	WASHINGTON
Sanction(s) Sought:	Cease and Desist Monetary Penalty other than Fines
Date Initiated:	01/15/2014
Docket/Case Number:	S-09-048-13CO01
Employing firm when activity occurred which led to the regulatory action:	PACIFIC WEST SECURITIES
Product Type:	Investment Contract
Allegations:	ON JANUARY 27, 2014, THE SECURITIES DIVISION ENTERED INTO A CONSENT ORDER WITH ROBIN THOMAS NAYLOR (THE RESPONDENT). THE SECURITIES DIVISION ALLEGED THAT NAYLOR, WHILE EMPLOYED AS A SECURITIES SALESPERSON AND INVESTMENT ADVISER REPRESENTATIVE WITH PACIFIC WEST SECURITIES, MADE UNSUITABLE TENANT-IN-COMMON ("TIC") SALES TO AT LEAST TWO OF HIS CUSTOMERS BETWEEN 2007 AND 2008. THE SECURITIES DIVISION ALLEGED THAT IN OFFERING AND SELLING THE TIC INVESTMENTS, NAYLOR VIOLATED THE SUITABILITY

	SECTION OF THE SECURITIES ACT OF WASHINGTON. THE RESPONDENT NEITHER ADMITTED NOR DENIED THE ALLEGATIONS, BUT AGREED TO CEASE AND DESIST FROM VIOLATING THE SECURITIES ACT OF WASHINGTON. THE RESPONDENT AGREED TO PAY INVESTIGATIVE COSTS OF $2,500. THE RESPONDENT WAIVED HIS RIGHT TO A HEARING AND TO JUDICIAL REVIEW OF THIS MATTER.
Current Status:	Final
Resolution:	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:	01/15/2014
Sanctions Ordered:	Cease and Desist Monetary Penalty other than Fines Other: $2,500 INVESTIGATIVE FEES
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	$2,500.00
Portion Levied against individual:	$2,500.00
Payment Plan:	NO
Is Payment Plan Current:	Yes
Date Paid by individual:	01/29/2014
Was any portion of penalty waived?	No
Amount Waived:	
Broker Statement	Two client accounts in question were hand delivered to my broker dealer by me. The cases were discussed with the compliance officers who asked me questions and approved the transactions after careful review. Clients signed 18 paragraphs of broker dealer risk disclosures for each investment, establishing themselves as speculative high risk investors for these particular investments at this particular time. Multiple sponsor risk disclosures were signed certifying the same. I believed I had reasonable grounds that these investments were suitable.

End of Report

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