



IAPD Report

DAVID RANDOLPH DAVIS

CRD# 1442736

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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

DAVID RANDOLPH DAVIS (CRD# 1442736)

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 **03/10/2026**.

CURRENT EMPLOYERS

| | Firm | CRD# | Registered Since |
|-----------|--|-------------|------------------|
| B | RAYMOND JAMES FINANCIAL SERVICES, INC. | CRD# 6694 | 09/11/2007 |
| IA | RAYMOND JAMES FINANCIAL SERVICES ADVISORS, INC | CRD# 149018 | 01/02/2009 |

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **40** 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 | RAYMOND JAMES FINANCIAL SERVICES | 6694 | Rancho Cordova, CA | 09/20/2007 - 01/02/2009 |
| IA | INVEST FINANCIAL CORPORATION | 12984 | AUBURN, CA | 01/14/2000 - 09/12/2007 |
| B | INVEST FINANCIAL CORPORATION | 12984 | AUBURN, CA | 10/31/1990 - 09/12/2007 |

For additional registration and employment history details as reported by the individual, refer to the Registration and Employment History section of the Detailed Report.

DISCLOSURE INFORMATION

Disclosure events include certain criminal charges and convictions, formal investigations and disciplinary actions initiated by regulators, customer disputes and arbitrations, and financial disclosures such as bankruptcies and unpaid judgments or liens.

Are there events disclosed about this representative? **Yes**

The following types of events are disclosed about this representative:

| Type | Count |
|------------------|-------|
| Customer Dispute | 3 |
| Termination | 1 |



Qualifications

REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works. This individual is currently registered with **40** jurisdiction(s) and 1 SRO(s) through his or her employer(s).

Employment 1 of 2

Firm Name: **RAYMOND JAMES FINANCIAL SERVICES, INC.**

Main Address: 880 CARILLON PARKWAY
ST. PETERSBURG, FL 33716

Firm ID#: 6694

| | Regulator | Registration | Status | Date |
|----------|-------------|-----------------------------------|----------|------------|
| B | FINRA | General Securities Principal | Approved | 09/11/2007 |
| B | FINRA | General Securities Representative | Approved | 09/11/2007 |
| B | Alabama | Agent | Approved | 03/22/2024 |
| B | Alaska | Agent | Approved | 01/03/2014 |
| B | Arizona | Agent | Approved | 12/04/2007 |
| B | Arkansas | Agent | Approved | 01/29/2008 |
| B | California | Agent | Approved | 09/11/2007 |
| B | Colorado | Agent | Approved | 01/25/2008 |
| B | Connecticut | Agent | Approved | 10/15/2024 |
| B | Florida | Agent | Approved | 01/03/2008 |
| B | Georgia | Agent | Approved | 12/04/2014 |
| B | Hawaii | Agent | Approved | 01/14/2008 |
| B | Idaho | Agent | Approved | 01/24/2008 |



Qualifications

| Regulator | Registration | Status | Date |
|-------------------------|--------------|----------|------------|
| B Illinois | Agent | Approved | 11/06/2025 |
| B Indiana | Agent | Approved | 02/18/2022 |
| B Iowa | Agent | Approved | 07/08/2022 |
| B Kansas | Agent | Approved | 02/20/2014 |
| B Kentucky | Agent | Approved | 08/02/2019 |
| B Maryland | Agent | Approved | 01/03/2014 |
| B Massachusetts | Agent | Approved | 01/14/2008 |
| B Michigan | Agent | Approved | 01/23/2008 |
| B Minnesota | Agent | Approved | 03/14/2011 |
| B Missouri | Agent | Approved | 01/03/2014 |
| B Nebraska | Agent | Approved | 12/13/2007 |
| B Nevada | Agent | Approved | 01/11/2008 |
| B New Hampshire | Agent | Approved | 01/07/2014 |
| B New Jersey | Agent | Approved | 08/15/2014 |
| B New Mexico | Agent | Approved | 01/03/2014 |
| B New York | Agent | Approved | 01/23/2008 |
| B North Carolina | Agent | Approved | 07/03/2013 |
| B North Dakota | Agent | Approved | 10/27/2009 |
| B Ohio | Agent | Approved | 01/04/2012 |



Qualifications

| Regulator | Registration | Status | Date |
|-------------------------|--------------|----------|------------|
| B Oklahoma | Agent | Approved | 01/23/2008 |
| B Oregon | Agent | Approved | 01/23/2008 |
| B Pennsylvania | Agent | Approved | 01/04/2011 |
| B South Carolina | Agent | Approved | 04/28/2017 |
| B Tennessee | Agent | Approved | 11/14/2019 |
| B Texas | Agent | Approved | 01/23/2008 |
| B Utah | Agent | Approved | 01/09/2008 |
| B Virginia | Agent | Approved | 01/03/2014 |
| B Washington | Agent | Approved | 01/25/2008 |
| B Wyoming | Agent | Approved | 04/02/2014 |

Branch Office Locations

RAYMOND JAMES FINANCIAL SERVICES
 558 MARKET STREET
 Colusa, CA 95932

RAYMOND JAMES FINANCIAL SERVICES
 155 N Tehama Street
 Willows, CA 95988

RAYMOND JAMES FINANCIAL SERVICES
 328 Walker Street
 Orland, CA 95963

RAYMOND JAMES FINANCIAL SERVICES
 1455 OLIVER ROAD
 FAIRFIELD, CA 94533

RAYMOND JAMES FINANCIAL SERVICES
 48 MAIN STREET
 WINTERS, CA 95694

RAYMOND JAMES FINANCIAL SERVICES
 555 MASON STREET
 SUITE 100
 VACAVILLE, CA 95688

RAYMOND JAMES FINANCIAL SERVICES
 390 Elm Avenue
 Auburn, CA 95603

Employment 2 of 2

Firm Name: **RAYMOND JAMES FINANCIAL SERVICES ADVISORS, INC**
 Main Address: 880 CARILLON PARKWAY
 SAINT PETERSBURG, FL 33716



Qualifications

Firm ID#: 149018

| Regulator | Registration | Status | Date |
|---------------|-----------------------------------|----------|------------|
| IA California | Investment Adviser Representative | Approved | 01/02/2009 |

Branch Office Locations

RAYMOND JAMES FINANCIAL SERVICES ADVISORS, INC
 555 MASON STREET
 SUITE 100
 VACAVILLE, CA 95688

RAYMOND JAMES FINANCIAL SERVICES ADVISORS, IN
 558 Market Street
 Colusa, CA 95932

RAYMOND JAMES FINANCIAL SERVICES ADVISORS, INC
 1455 OLIVER ROAD
 FAIRFIELD, CA 94533

RAYMOND JAMES FINANCIAL SERVICES ADVISORS, IN
 390 Elm Avenue
 Auburn, CA 95603

RAYMOND JAMES FINANCIAL SERVICES ADVISORS, INC
 155 N Tehama Street
 Willows, CA 95988

RAYMOND JAMES FINANCIAL SERVICES ADVISORS, IN
 328 Walker Street
 Orland, CA 95963

RAYMOND JAMES FINANCIAL SERVICES ADVISORS, INC
 48 MAIN STREET
 WINTERS, CA 95694




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



Principal/Supervisory Exams

| Exam | Category | Date |
|--|-----------|------------|
|  General Securities Principal Examination (S24) | Series 24 | 03/27/1989 |

General Industry/Product Exams

| Exam | Category | Date |
|--|----------|------------|
|  Securities Industry Essentials Examination (SIE) | SIE | 10/01/2018 |
|  General Securities Representative Examination (S7) | Series 7 | 12/14/1985 |

State Securities Law Exams

| Exam | Category | Date |
|--|-----------|------------|
|  Uniform Investment Adviser Law Examination (S65) | Series 65 | 08/30/1999 |
|  Uniform Securities Agent State Law Examination (S63) | Series 63 | 09/19/1986 |

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 | 09/20/2007 - 01/02/2009 | RAYMOND JAMES FINANCIAL SERVICES | CRD# 6694 | Rancho Cordova, CA |
| IA | 01/14/2000 - 09/12/2007 | INVEST FINANCIAL CORPORATION | CRD# 12984 | AUBURN, CA |
| B | 10/31/1990 - 09/12/2007 | INVEST FINANCIAL CORPORATION | CRD# 12984 | AUBURN, CA |
| B | 10/31/1989 - 08/23/1990 | GNA SECURITIES, INC. | CRD# 10465 | GLEN ALLEN, VA |
| B | 06/20/1988 - 09/21/1989 | MARKETING ONE SECURITIES, INC. | CRD# 16611 | PORTLAND, OR |
| B | 10/02/1986 - 09/22/1987 | E. F. HUTTON & COMPANY INC | CRD# 235 | |
| B | 12/17/1985 - 10/16/1986 | CHRISTOPHER WEIL & COMPANY, INC | CRD# 6566 | |

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 |
|-------------------|--|-------------------|--------------------|---------------------------|
| 01/2026 - Present | FIRST NORTHERN BANK | Other | N | AUBURN, CA, United States |
| 01/2009 - Present | RAYMOND JAMES FINANCIAL SERVICES ADVISORS, INC | MASS TRANSFER | Y | AUBURN, CA, United States |
| 09/2007 - Present | RAYMOND JAMES FINANCIAL SERVICES | FINANCIAL ADVISOR | Y | AUBURN, CA, United States |

OTHER BUSINESS ACTIVITIES

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

- (1)Name of Business: First Northern Advisors Address: 390 Elm Ave, Auburn, CA, 95603, United States Activity Type: Support Company - Non Owner Position/Title: Other Investment Related: No Start Date: 06/01/2021 Hours per month devoted to this business: 81+ Hours per month devoted to this business during trading hours: 81+ Description of duties: Financial Advisor
- (2)Name of Business: single family home rental property Address: 3009 Mt. Baldy Drive, Roseville, CA, 95747, United States Activity Type: Rental Real Estate Position/Title: Owner/Proprietor Investment Related: Yes Start Date: 08/01/2021 Hours per month devoted to this business: 0-1 Hours per month devoted to this business during trading hours: 0-1 Description of duties:



Registration & Employment History



OTHER BUSINESS ACTIVITIES

property owner



Disclosure Summary

Disclosure Information

What you should know about reported disclosure events:

(1) Certain thresholds must be met before an event is reported to IARD, for example:

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

(2) Disclosure events in IAPD reports come from different sources:

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

(3) There are different statuses and dispositions for disclosure events:

- A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
 - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

(4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.



DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

| Type | Count |
|------------------|-------|
| Customer Dispute | 3 |
| Termination | 1 |

Customer Dispute

This section provides information regarding a customer dispute that was reported to the Investment Adviser Registration Depository (IARD) by the Investment Adviser Representative (IAR), an investment adviser and/or securities firm, and/or a securities regulator. The event may include a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit that contains allegations of sales practice violations against the individual.

The customer dispute may be pending or may have resulted in a civil judgment, arbitration award, monetary settlement, closure without action, withdrawal, dismissal, denial, or other outcome.

Disclosure 1 of 3

| | |
|--|---|
| Reporting Source: | Firm |
| Employing firm when activities occurred which led to the complaint: | INVEST FINANCIAL CORPORATION |
| Allegations: | CLIENT ALLEGES THE WRONG FUND WAS PLACED IN HIS ACCOUNT, SUBSEQUENTLY CAUSING AN EARLY LIQUIDATION FEE. |
| Product Type: | Mutual Fund(s) |
| Alleged Damages: | \$150,000.00 |

Customer Complaint Information

| | |
|--|------------------------|
| Date Complaint Received: | 09/04/2007 |
| Complaint Pending? | No |
| Status: | Arbitration/Reparation |
| Status Date: | 05/01/2008 |
| Settlement Amount: | \$0.00 |
| Individual Contribution Amount: | \$0.00 |

Arbitration Information

| | |
|---|----------------|
| Arbitration/Reparation Claim filed with and Docket/Case No.: | FINRA 08-01343 |
|---|----------------|



Date Notice/Process Served: 05/01/2008
Arbitration Pending? No
Disposition: Settled
Disposition Date: 12/12/2008
Monetary Compensation Amount: \$45,000.00
Individual Contribution Amount: \$0.00
Firm Statement ALLEGED DAMAGES \$150,000.00 SETTLED FOR \$45,000.00

.....

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: RAYMOND JAMES FINANCIAL SERVICES, INC
Allegations: CLIENT ALLEGES THE WRONG FUND WAS PLACED IN HIS ACCOUNT, SUBSEQUENTLY CAUSING AN EARLY LIQUIDATION FEE.
Product Type: Mutual Fund
Alleged Damages: \$150,000.00

Customer Complaint Information

Date Complaint Received: 09/04/2007
Complaint Pending? No
Status: Settled
Status Date: 05/01/2008
Settlement Amount: \$0.00
Individual Contribution Amount: \$0.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA
Docket/Case #: 08-01343
Date Notice/Process Served: 05/01/2008
Arbitration Pending? No
Disposition: Settled
Disposition Date: 12/12/2008
Monetary Compensation Amount: \$45,000.00
Individual Contribution Amount: \$0.00
Broker Statement [CUSTOMER] REQUESTED TAX-FREE INCOME DUE TO HIS HIGH TAX BRACKET. I GAVE HIM A FULL PRESENTATION, BROCHURE AND PROSPECTUS ON THE FRANKLIN CAL. TAX-FREE INCOME FUND(FKTFX),



WHICH PROVIDES TAX-FREE INCOME FROM BOTH STATE AND FEDERAL INCOME TAXES. [CUTOMER] INVESTED IN THIS VERY SAME FUND AND RECEIVED A CONFIRMATION STATEMENT INITIALLY AND MONTHLY STATEMENTS THEREAFTER CONFIRMING THIS SPECIFIC FUND POSITION. WE HAD NUMEROUS CONVERSATIONS CONFIRMING THIS AS WELL AND HE NEVER EXPRESSED ANY DISCONTENT SO THERE WAS NO "WRONG FUND" TRANSACTION. I ALSO PRESENTED FRANKLIN TEMPLETON'S NAV A-SHARE PURCHASE PLAN TO [CUSTOMER] WHICH ALLOWS AN INVESTOR WITH \$1MM OR MORE TO GO INTO ANY FRANKLIN FUND ACCOUNT AT NO INITIAL COST, WHICH NORMALLY CAN GO UP TO AS HIGH AS 5.75% DEPENDING ON THE FUND CHOSEN. FRANKLIN TEMPLETON ONLY ASKS THAT THE INVESTOR NOT TAKE MORE THAN THE DIVIDEND INCOME OUT PRIOR TO 18 MONTHS OR A 1% CDSC CHARGE IS INCURRED(THEN IT DROPS TO ZERO). [CUSTOMER] AGREED THAT WOULD WORK FINE. SUBSEQUENTLY MY COMPANY WAS SOLD TO WELLS FARGO BANK, WHO [CUSTOMER] SEVERELY DISLIKED FROM PREVIOUS DEALINGS. AS A RESULT, THROUGH NO FAULT OF MINE AS HE TOLD ME, HE TRANSFERRED HIS SHARES IN FKTFX TO ANOTHER BROKER/DEALER BACK EAST. HIS NEW FINANCIAL ADVISOR SOLD THESE SHARES PRIOR TO THE 18 MONTH HOLDING PERIOD AND A 1% CHARGE WAS INCURRED. I FOUND OUT LATER [CUSTOMER] WAS UNHAPPY ABOUT THIS FEE CHARGED BUT HIS NEW ADVISOR WAS RESPONSIBLE FOR THIS FEE BY NOT WAITING UNTIL 18 MONTHS HAD PASSED. THUS, I FULFILLED MY FIDUCIARY RESPONSIBILITIES BY DELIVERING A HIGH QUALITY FINANCIAL PRODUCT WITHOUT ANY INITIAL CHARGES TO MEET [CUSTOMER'S] REQUESTED TAX-FREE NEEDS AND DID SO IN AN HONEST, FORTHRIGHT MANNER."

ALLEGED DAMAGES \$150,000.00 SETTLED FOR \$45,000.00

Disclosure 2 of 3

Reporting Source: Regulator

Employing firm when activities occurred which led to the complaint:

Allegations: MISREPRESENTATION; OMISSION OF FACTS

Product Type:

Alleged Damages: \$1,000.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: [NASD - CASE #96-03867](#)

Date Notice/Process Served: 11/11/1996

Arbitration Pending? No

Disposition: Award

Disposition Date: 04/30/1997

Disposition Detail: RESPONDENT BE AND HEREBY IS LIABLE AND SHALL PAY CLAIMANT THE SUM OF \$1,000 IN ACTUAL DAMAGES.

Reporting Source: Individual

**Employing firm when activities occurred which led to the complaint:**

Allegations: CLIENT STATED DISCLOSURE WAS NOT MADE ON CDSC SALES CHARGE, RISK AND LACK OF LIQUITY. CLIENT ASKED FOR \$2,500.00. NO DAMAGES WERE AWARDED.

Product Type:

Alleged Damages: \$1,000.00

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 Assoc. of Securities Dealers; 96-03867](#)

Date Notice/Process Served: 11/11/1996

Arbitration Pending? No

Disposition: Award to Customer

Disposition Date:

Monetary Compensation Amount: \$1,025.00

Individual Contribution Amount:**Broker Statement**

NO ACTION WAS WARRANTED REGARDING MY ACTIVITIES RELATING TO THE MATTERS REFERENCED IN THE CUSTOMERS COMPLAINT
FULL DISCLOSURES WERE PROPERLY PROVIDED OF ALL RELEVANT DETAILS (PORTFOLIO BREAKDOWN, RISK FACTORS, CDSC SALES CHARGE, LIQUIDITY ETC). THE CLIENT WAS VERY HAPPY WITH THE INVESTMENT UNTIL TWO WEEKS LATER HER SON, A BROKER FOR 25 YEARS IN THE IVNESTMENT INDUSTRY CALLED AND SAID ONLY THAT THE FIVE YEAR CDSC WAS TOO LONG FOR HIS MITHER AND HE WANTED A RENEGE. I EXPLAINED ALL WAS DONE PROPERLY. HE THREATENDED TO MAKE TROUBLE AND DID, WITHOUT ANY BASIS IN FACT.

Disclosure 3 of 3

Reporting Source: Firm



Employing firm when activities occurred which led to the complaint: SHEARSON LEHMAN HUTTON INC.

Allegations:

Product Type:

Alleged Damages:

Customer Complaint Information

Date Complaint Received:

Complaint Pending? No

Status: Litigation

Status Date:

Settlement Amount:

Individual Contribution Amount:

Civil Litigation Information

Court Details: SUPERIOR; ALAMEDA COUNTY, CA; H-137305-3

Date Notice/Process Served: 10/31/1988

Litigation Pending? No

Disposition: Settled

Disposition Date: 03/01/1990

Monetary Compensation Amount: \$430,000.00

Individual Contribution Amount: \$0.00

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: SHEARSON LEHMAN HUTTON INC.

Allegations: THE [CUSTOMERS] ALLEGED THAT MR. DAVIS HAD MADE UNSUITABLE RECOMMENDATIONS TO THEM. SPECIFICALLY, THE [CUSTOMERS] CLAIMED THAT THEIR MARCH 2, 1987 INVESTMENT OF \$2,000,000 IN THE PUTNAM HIGH INCOME GOVERNMENT TRUST BOND FUND AND THEIR \$2,550,000 INVESTMENT IN THE PUTNAM CALIFORNIA TAX EXEMPT FUND WAS UNSUITABLE. MR. DAVIS MAINTAINS THAT THE [CUSTOMERS] WANTED TO ACHIEVE A HIGHER RATE OF RETURN THAN THAT AVAILABLE THROUGH CERTIFICATES OF DEPOSIT OR MONEY MARKET ACCOUNTS. MR. DAVIS MADE IT CLEAR TO THE [CUSTOMERS] THAT THEIR PRINCIPAL IN THE PUTNAM FUNDS WAS AT RISK AND WOULD DECREASE IN VALUE IF INTEREST RATES WERE TO RISE. MR. DAVIS GAVE THE [CUSTOMERS] PROSPECTUSES WHICH DISCLOSED THAT THE VALUE OF THE SECURITIES COMPRISING THE



ASSETS OF THE FUNDS WOULD FLUCTUATE WITH CHANGES IN INTEREST RATES. THE [CUSTOMERS] ALLEGED THAT THEY LOST \$533,682.55.

Product Type:

Alleged Damages:

Customer Complaint Information

Date Complaint Received:

Complaint Pending? No

Status: Litigation

Status Date:

Settlement Amount:

Individual Contribution Amount:

Civil Litigation Information

Court Details: SUPERIOR; ALAMEDA COUNTY, CA; H-137305-3

Date Notice/Process Served: 10/31/1988

Litigation Pending? No

Disposition: Settled

Disposition Date: 03/01/1990

Monetary Compensation Amount: \$430,000.00

Individual Contribution Amount: \$0.00

Broker Statement

THE CASE WAS SETTLED WITH SHEARSON'S PAYMENT TO THE [CUSTOMERS] OF \$430,000. MR. DAVIS DID NOT MAKE ANY CONTRIBUTIONS TO THE SETTLEMENT.

THE [CUSTOMERS] OPENED AN ACCOUNT WITH MR. DAVIS AT E.F. HUTTON IN FEBRUARY 1987. AT THE TIME THEY HAD EXPERIENCE INVESTING IN THE STOCK MARKET AND WERE SOPHISTICATED REAL ESTATE INVESTORS WITH A NET WORTH WELL IN EXCESS OF \$1,000,000. SHORTLY AFTER OPENING THEIR ACCOUNT THEY INVESTED \$4,550,000 IN TWO PUTNAM BOND FUNDS. SHORTLY THEREAFTER INTEREST RATES UNEXPECTEDLY AND RAPIDLY ROSE AND THE NET ASSET VALUE OF THE [CUSTOMERS'] PUTNAM INVESTMENTS PRECIPITIOUSLY DECLINED. THE [CUSTOMERS'] LOSSES WERE PART OF THE DRAMATIC BOND CRASH IN THE SPRING OF 1987 AND WERE CAUSED BY EVENTS BEYOND MR. DAVIS OR E.F. HUTTON'S CONTROL.



Termination

This disclosure event involves a situation where the Investment Adviser Representative voluntarily resigned, was discharged or was permitted to resign after allegations were made that accused the Investment Adviser Representative of violating investment-related statutes, regulations, rules or industry standards of conduct; fraud or the wrongful taking of property; or failure to supervise in connection with investment-related statutes, regulations, rules or industry standards of conduct.

Disclosure 1 of 1

Reporting Source: Individual

Firm Name: GNA SECURITIES, INC

Termination Type: Discharged

Termination Date: 08/17/1990

Allegations: Not Provided
GNA FELT A DISCLOSURE OF A CUSTOMER COMPLAINT AT THE TIME OF DOING A U-4 TRANSFER OF MY SERIES 7 LICENSE WAS OMITTED IMPROPERLY. (I WAS A "DUAL EMPLOYEE" OF GNA AND CENFED INVESTMENTS, INC., A SUBSIDIARY OF CENTRURY FEDERAL SAVINGS & LOAN.)

Product Type:

Other Product Types:

Broker Statement Not Provided
THE OMITTANCE OF THE CUSTOMER COMPLAINT ON THE U-4 FORMS WAS AN HONEST, INADVERTENT MISTAKE ON MY PART, MY PREVIOUS EMPLOYER, E.F. HUTTON, HAD NOT COMMUNICATED THIS SITUATION FULLY TO ME UNTIL AFTER THE TIME OF THIS TRANSFER PROCESS. IT IS MY BELIEF THAT GNA'S DECISION WAS INFLUENCED BY THEIR KNOWLEGE THAT I WAS PREPARING TO PRESENT A BROKER/DEALER CHANGE FORM GNA TO ANTOHER CO., FOR THE SENIOR MGT. OF MY EMPLOYER, CENFED.



End of Report

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