IAPD Report

KEVIN JAMES IMHOFF

CRD# 1464384

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

KEVIN JAMES IMHOFF (CRD# 1464384)

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 **09/20/2024**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	HBW ADVISORY SERVICES LLC	CRD# 143665	11/01/2010

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **2** 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	BLUE DIAMOND FINANCIAL COACHING LLC	283003	LANSING, MI	05/12/2016 - 01/23/2024
B	CETERA ADVISOR NETWORKS LLC	13572	LANSING, MI	06/26/2017 - 10/02/2023
B	HBW SECURITIES LLC	136959	LANSING, MI	08/18/2008 - 07/13/2017

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	4

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 **2** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **HBW ADVISORY SERVICES LLC**

Main Address: 2655 1ST STREET
SUITE 250
SIMI VALLEY, CA 93065

Firm ID#: 143665

	Regulator	Registration	Status	Date
IA	Kentucky	Investment Adviser Representative	Approved	05/30/2014
IA	Michigan	Investment Adviser Representative	Approved	11/01/2010

Branch Office Locations

HBW ADVISORY SERVICES LLC
4112 W. ST. JOE HWY
SUITE C
LANSING, MI 48917

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
B	Investment Company Products/Variable Contracts Principal Examination (S26)	Series 26	03/25/1988

General Industry/Product Exams

	Exam	Category	Date
B	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
B	Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	03/04/1986

State Securities Law Exams

	Exam	Category	Date
IA	Uniform Investment Adviser Law Examination (S65)	Series 65	12/18/2009
B	Uniform Securities Agent State Law Examination (S63)	Series 63	03/07/1986

PROFESSIONAL DESIGNATIONS

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

No information reported.

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

Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
IA	05/12/2016 - 01/23/2024	BLUE DIAMOND FINANCIAL COACHING LLC	CRD# 283003	LANSING, MI
B	06/26/2017 - 10/02/2023	CETERA ADVISOR NETWORKS LLC	CRD# 13572	LANSING, MI
B	08/18/2008 - 07/13/2017	HBW SECURITIES LLC	CRD# 136959	LANSING, MI
B	03/06/1986 - 08/18/2008	PFS INVESTMENTS INC.	CRD# 10111	LANSING, MI

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
04/2016 - Present	BLUE DIAMOND FINANCIAL COACHING LLC	MANAGING MEMBER/INVESTMENT ADVISOR REPRESENTATIVE/OWNER	Y	Lansing, MI, United States
01/2010 - Present	HBW ADVISORY SERVICES LLC	INVESTMENT ADVISOR REPRESENTATIVE	Y	SIMI VALLEY, CA, United States
08/2008 - Present	HBW INSURANCE & FINANCIAL SERVICE, INC. DBA HBW PARTNERS	INSURANCE AGENT	Y	SIMI VALLEY, CA, United States
07/2008 - Present	BLUE DIAMOND ENTERPRISES, LLC	OWNER	Y	LANSING, MI, United States
07/2008 - Present	BLUE DIAMOND FINANCIAL SOLUTIONS	PARTNER/DBA	Y	LANSING, MI, United States
06/2017 - 09/2023	CETERA ADVISOR NETWORKS LLC	REGISTERED REPRESENTATIVE	Y	EL SEGUNDO, CA, United States
03/2018 - 12/2020	BLUE DIAMOND BUSINESS SOLUTIONS	OWNER / MARKET DIRECTOR	N	LANSING, MI, United States
01/2018 - 12/2019	ELITE MARKETING GROUP	INSURANCE AGENT	Y	LANSING, MI, United States
08/2008 - 06/2017	HBW SECURITIES LLC	REGISTERED REPRESENTATIVE	Y	SIMI VALLEY, CA, 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) NAME OF OTHER BUSINESS: BLUE DIAMOND FINANCIAL COACHING, LLC
INVESTMENT RELATED: YES
ADDRESS: SAME AS REGISTERED LOCATION
NATURE OF BUSINESS: FINANCIAL PLANNING SERVICES
POSITION/TITLE/RELATIONSHIP: INVESTMENT ADVISORY REPRESENTATIVE
START DATE: 4/2016
APX NUMBER OF HOURS PER WEEK: 40
APX NUMBER OF HOURS DURING TRADING HOURS: 32.5
BRIEF DESCRIPTION OF DUTIES: INVESTMENT ADVISORY REPRESENTATIVE:
(2) NAME OF OTHER BUSINESS: HBW ADVISORY SERVICES, LLC INVESTMENT RELATED: YES ADDRESS: SAME AS REGISTERED LOCATION NATURE OF BUSINESS: HBW ADVISORY SERVICES LLC PRIMARILY SERVICES THE FINANCIAL PLANNING AND INVESTMENT MANAGEMENT NEEDS OF INDIVIDUALS AND SMALL BUSINESSES POSITION/TITLE/RELATIONSHIP: INVESTMENT ADVISORY REPRESENTATIVE START DATE: 1/2010 APX NUMBER OF HOURS PER WEEK: 40 APX NUMBER OF HOURS DURING TRADING HOURS: 32.5 BRIEF DESCRIPTION OF DUTIES: INVESTMENT ADVISORY REPRESENTATIVE

(3) NAME OF OTHER BUSINESS: FIXED INSURANCE WITH VARIOUS COMPANIES
INVESTMENT RELATED: YES
ADDRESS: SAME AS REGISTERED LOCATION
NATURE OF BUSINESS: FIXED INSURANCE
START DATE: 4/2017
APX NUMBER OF HOURS PER WEEK: 4
APX NUMBER OF HOURS DURING TRADING HOURS: 4
POSITION/TITLE/RELATIONSHIP: INSURANCE AGENT
BRIEF DESCRIPTION OF DUTIES: SELLS LIFE, HEALTH, DISABILITY, ANNUITIES, AND LONG TERM CARE

(4) NAME OF OTHER BUSINESS: BLUE DIAMOND ENTERPRISES, LLC DBA BLUE DIAMOND FINANCIAL SOLUTIONS
INVESTMENT RELATED: YES
ADDRESS: SAME AS REGISTERED LOCATION
NATURE OF BUSINESS: FINANCIAL SERVICES
START DATE: 7/2008
POSITION/TITLE/RELATIONSHIP: OWNER - FINANCIAL ADVISOR
APX NUMBER OF HOURS PER WEEK: 40
APX NUMBER OF HOURS DURING TRADING HOURS: 40
BRIEF DESCRIPTION OF DUTIES: OWNER - FINANCIAL ADVISOR

(5) NAME OF OTHER BUSINESS: HBW INSURANCE & FINANCIAL SERVICES, INC. DBA HBW PARTNERS
INVESTMENT RELATED: YES
ADDRESS: SAME AS REGISTERED LOCATION
NATURE OF BUSINESS: INSURANCE AND FINANCIAL SALES
START DATE: 8/2008
POSITION/TITLE/RELATIONSHIP: INSURANCE SALES
APX NUMBER OF HOURS PER WEEK: 10
APX NUMBER OF HOURS DURING TRADING HOURS: 10
BRIEF DESCRIPTION OF DUTIES: INSURANCE SALES
9/2024 - ENCORESTATE PLANS, SALES/REFERRALS, PRESENT BASIC ESTATE PLANNING CONCEPTS TO CLIENTS, REFER THEM TO STAFF TO HELP PREPARE DOCUMENTS TO CREATE TRUST, WILLS, POA, ETC.

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*.
    - o A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
    - o A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
    - o 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*.
    - o 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.
    - o 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.
    - o 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	4

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 4

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	PFS INVESTMENTS INC.
Allegations:	CUSTOMERS ALLEGE THAT MR. IMHOFF USED INFORMATION OBTAINED THROUGH THEIR RELATIONSHIP WITH HIM AS THEIR REGISTERED REPRESENTATIVE TO SUGGEST THAT THEY PURCHASE FLORIDA CONDOS ON WHICH HE MADE A PROFIT OF $535,000. THEY CLAIM, IN DOING SO, MR. IMHOFF BREACHED DUTIES OWED TO THEM, AND HIS ACTIONS CONSTITUTED A CONFLICT OF INTEREST.
Product Type:	No Product
Alleged Damages:	$565,390.00
Alleged Damages Amount Explanation (if amount not exact):	ALLEGED COMPENSATORY DAMAGE AMOUNT IS FROM THE CUSTOMER COMPLAINT. NO AMOUNT WAS SPECIFIED IN THE STATEMENT OF CLAIM, BUT THE AMOUNT IS OVER $5,000.00.
Is this an oral complaint?	No
Is this a written complaint?	Yes
Is this an arbitration/CFTC reparation or civil litigation?	Yes
Arbitration/Reparation forum or court name and location:	FINRA
Docket/Case #:	11-04197

Filing date of arbitration/CFTC reparation or civil litigation:	10/31/2011

Customer Complaint Information

Date Complaint Received:	11/21/2011
Complaint Pending?	No
Status:	Settled
Status Date:	12/12/2012
Settlement Amount:	$372,500.00
Individual Contribution Amount:	$0.00
Firm Statement	CAME IN AS COMPLAINT, NOW AN ARBITRATION.

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	PFS INVESTMENTS, INC.
Allegations:	CUSTOMERS ALLEGE THAT MR. IMHOFF USED INFORMATION OBTAINED THROUGH THEIR RELATIONSHIP WITH HIM AS THEIR REGISTERED REPRESENTATIVE TO SUGGEST THAT THEY PURCHASE FLORIDA CONDOS ON WHICH HE MADE A PROFIT OF $535,000. THEY CLAIM, IN DOING SO, MR. IMHOFF BREACHED DUTIES OWED TO THEM, AND HIS ACTIONS CONSTITUTED A CONFLICT OF INTEREST.
Product Type:	Other: REAL ESTATE
Alleged Damages:	$565,390.00
Is this an oral complaint?	No
Is this a written complaint?	Yes
Is this an arbitration/CFTC reparation or civil litigation?	Yes
Arbitration/Reparation forum or court name and location:	FINRA
Docket/Case #:	11-04197
Filing date of arbitration/CFTC reparation or civil litigation:	10/31/2011

Customer Complaint Information

Date Complaint Received:	03/15/2012
Complaint Pending?	No
Status:	Settled
Status Date:	12/12/2012
Settlement Amount:	$372,500.00

Individual Contribution Amount:	$0.00
Broker Statement	CUSTOMERS ARE COMPLAINING THAT THEY LOST MONEY ON CONDOMINIUMS THEY PURCHASED FROM MY WIFE'S REAL ESTATE COMPANY, CITING THAT THEY PURCHASED THE PROPERTY BECAUSE OF THEIR RELATIONSHIP WITH ME. PER INSTRUCTIONS FROM MY FORMER OSJ, I HAD NO OWNERSHIP IN HER COMPANY, NOR DID I EVER RECEIVE COMPENSATION OF ANY KIND FROM IT. FURTHER, I MADE SURE TO THE BEST OF MY KNOWLEDGE, THAT NO PFS INVESTMENTS WERE USED TO PURCHASE ANY REAL ESTATE. ACCORDING TO MY SPOUSE, THESE CUSTOMERS SIGNED INITIAL PURCHASE AGREEMENTS WITH HER COMPANY IN JULY & AUGUST 2006 AND CLOSING TOOK PLACE ON ONE CONDO IN SEPTEMBER 2006 WITH THE REMAINING CLOSING IN MARCH & APRIL 2007. SHE ALSO HAD THEM SIGN MULTIPLE DISCLOSURES CONFIRMING, AMONG OTHER THINGS, THAT THEY UNDERSTOOD THEIR REAL ESTATE PURCHASES WERE IN NO WAY CONNECTED TO PRIMERICA, MYSELF AS AN INDIVIDUAL OR AS AN AGENT OF PRIMERICA. THE DISCLOSURES SAY THEY UNDERSTOOD THERE WAS NO GUARANTEE REGARDING THE FUTURE VALUE OF ANY PROPERTIES. THE DISCLOSURES ALSO ENCOURAGED AND CONFIRMED THEIR RESPONSIBILITY TO DO THEIR OWN DUE DILIGENCE WHEN DECIDING TO PURCHASE REAL ESTATE FROM MY WIFE'S COMPANY.

Disclosure 2 of 4

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	PFS INVESTMENTS INC.
Allegations:	CUSTOMERS ALLEGE THAT REPRESENTATIVE PROVIDED FALSE INFORMATION TO THEM REGARDING CONDOS THEY PURCHASED FROM HIS WIFE'S BUSINESS IN SEPT 2006, MARCH AND APRIL 2007.
Product Type:	Other: REAL ESTATE
Alleged Damages:	$1,525,884.00
Alleged Damages Amount Explanation (if amount not exact):	ALLEGED LOSSES ON REAL ESTATE PROPERTIES PURCHASED FROM MY WIFE'S BUSINESS.
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:	09/28/2009
Complaint Pending?	No
Status:	Evolved into Arbitration/CFTC reparation (the individual is a named party)
Status Date:	03/30/2010
Settlement Amount:	

Individual Contribution Amount:

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	10-01611
Date Notice/Process Served:	04/19/2010
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	04/11/2011
Monetary Compensation Amount:	$195,000.00
Individual Contribution Amount:	$0.00

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	PFS INVESTMENTS, INC.
Allegations:	CUSTOMERS ALLEGE THAT REPRESENTATIVE PROVIDED FALSE INFORMATION TO THEM REGARDING CONDOS THEY PURCHASED FROM HIS WIFE'S BUSINESS IN SEPT. 2006, MARCH & APRIL 2007.
Product Type:	Other: REAL ESTATE
Alleged Damages:	$1,525,884.00
Alleged Damages Amount Explanation (if amount not exact):	ALLEGED LOSSES ON REAL ESTATE PROPERTIES PURCHASED FROM MY WIFE'S BUSINESS.
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:	09/28/2009
Complaint Pending?	No
Status:	Evolved into Arbitration/CFTC reparation (the individual is a named party)
Status Date:	03/30/2010
Settlement Amount:	
Individual Contribution Amount:	

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	10-01611
Date Notice/Process Served:	04/19/2010
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	04/11/2011
Monetary Compensation Amount:	$195,000.00
Individual Contribution Amount:	$0.00
Broker Statement	CUSTOMERS ARE COMPLAINING THAT THEY LOST MONEY ON CONDOMINIUMS THEY PURCHASED FROM MY WIFE'S REAL ESTATE COMPANY, CITING THAT THEY PURCHASED THE PROPERTY BECAUSE OF THEIR RELATIONSHIP WITH ME. PER INSTRUCTIONS FROM MY FORMER OSJ, I HAD NO OWNERSHIP IN HER COMPANY, NOR DID I EVER RECEIVE COMPENSATION OF ANY KIND FROM IT. FURTHER, I MADE SURE TO THE BEST OF MY KNOWLEDGE, THAT NO PFS INVESTMENTS WERE USED TO PURCHASE ANY REAL ESTATE. ACCORDING TO MY SPOUSE, THESE CUSTOMERS SIGNED AN INITIAL PURCHASE AGREEMENT WITH HER COMPANY IN AUGUST 2006, CLOSING TOOK PLACE IN SEPTEMBER 2006 AND APRIL OF 2007. SHE ALSO HAD THEM SIGN MULTIPLE DISCLOSURES CONFIRMING,AMONG OTHER THINGS, THAT THEY UNDERSTOOD THEIR REAL ESTATE PURCHASES WERE IN NO WAY CONNECTED TO PRIMERICA, MYSELF AS AN INDIVIDUAL OR AS AN AGENT OF PRIMERICA. THESE SIGNED DISCLOSURES STATE THE EXACT OPPOSITE OF WHAT THEIR ALLEGATIONS ARE, SUCH AS THEY UNDERSTOOD THERE WAS NO GUARANTEE REGARDING THE FUTURE VALUE OF ANY PROPERTIES PURCHASED.

Disclosure 3 of 4

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	PFS INVESTMENTS INC.
Allegations:	CUSTOMERS ALLEGE THAT REPRESENTATIVE PROVIDED FALSE INFORMATION TO THEM A CONDO THEY PURCHASED FROM HIS WIFE'S BUSINESS IN MARCH 2007.
Product Type:	Other: REAL ESTATE
Alleged Damages:	$234,000.00
Alleged Damages Amount Explanation (if amount not exact):	THIS IS THE ALLEGED DIFFERENCE BETWEEN THE LOAN BALANCE AND THE CURRENT PROPERY VALUE.
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:	09/04/2009
Complaint Pending?	No
Status:	Settled
Status Date:	11/11/2010
Settlement Amount:	$88,500.00
Individual Contribution Amount:	$0.00
Firm Statement	PFS INVESTMENTS DENIES ANY LIABILITY TO THE CLAIMANTS AND RESOLVED THIS COMPLAINT FOR COST OF DEFENSE REASONS AND IN EXCHANGE FOR A GENERAL RELEASE OF CLAIMS AGAINST THE COMPANY AND AN ASSIGNMENT OF THE CLAIMANTS CLAIMS AGAINST MR. IMHOFF.

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	PFS INVESTMENTS, INC.
Allegations:	CUSTOMERS ALLEGE THAT REPRESENTATIVE PROVIDED FALSE INFORMATION TO THEM REGARDING A CONDO THEY PURCHASED FROM HIS WIFE'S BUSINESS IN MARCH 2007.
Product Type:	Other: REAL ESTATE
Alleged Damages:	$234,000.00
Alleged Damages Amount Explanation (if amount not exact):	DIFFERENCE OF LOAN BALANCE AND CURRENT PROPERTY VALUE.
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:	09/24/2009
Complaint Pending?	No
Status:	Settled
Status Date:	11/11/2010
Settlement Amount:	$88,500.00
Individual Contribution Amount:	$0.00
Broker Statement	CUSTOMERS ARE COMPLAINING THAT THEY LOST MONEY ON A CONDOMINIUM THEY PURCHASED FROM MY WIFE'S REAL ESTATE COMPANY, CITING THAT THEY PURCHASED THE PROPERTY BECAUSE OF THEIR RELATIONSHIP WITH ME. PER INSTRUCTIONS FROM MY FORMER OSJ, I HAD NO OWNERSHIP IN HER COMPANY, NOR DID I EVER RECEIVE COMPENSATION OF ANY KIND FROM IT. FURTHER, I MADE SURE TO THE

	BEST OF MY KNOWLEDGE, THAT NO PFS INVESTMENTS WERE USED TO PURCHASE ANY REAL ESTATE. ACCORDING TO MY SPOUSE, THESE CUSTOMERS SIGNED AN INITIAL PURCHASE AGREEMENT WITH HER COMPANY IN AUGUST 2006, CLOSING TOOK PLACE IN MARCH 2007. SHE ALSO HAD THEM SIGN DISCLOSURES CONFIRMING, AMONG OTHER THINGS, THAT THEY UNDERSTOOD THEIR REAL ESTATE PURCHASE WAS IN NO WAY CONNECTED TO PRIMERICA, MYSELF AS AN INDIVIDUAL OR AS AN AGENT OF PRIMERICA. THESE SIGNED DISCLOSURES STATE THE EXACT OPPOSITE OF WHAT THEIR ALLEGATIONS ARE, SUCH AS FACT THAT THEY UNDERSTOOD THERE WAS NO GUARANTEE REGARDING FUTURE VALUE OF ANY PROPERTY PURCHASED.

Disclosure 4 of 4

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	PFS INVESTMENTS, INC.
Allegations:	THE CUSTOMER ALLEGED THAT THE REPRESENTATIVE GAVE HER ERRONEOUS ADVICE THAT CAUSED HER TO VIOLATE THE TERMS OF A 72(T) AND INCUR RELATED TAX CONSEQUENCES.
Product Type:	Annuity(ies) - Variable
Alleged Damages:	$4,567.37

Customer Complaint Information

Date Complaint Received:	05/13/2008
Complaint Pending?	No
Status:	Settled
Status Date:	12/16/2008
Settlement Amount:	$10,000.00
Individual Contribution Amount:	$0.00

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	PFS INVESTMENTS, INC.
Allegations:	THE CUSTOMER ALLEGED THAT THE REPRESENTATIVE GAVE HER ERRONEOUS ADVICE THAT CAUSED HER TO VIOLATE TERMS OF A 72(T) AND INCUR RELATED TAX CONSEQUENCES.
Product Type:	Annuity(ies) - Variable
Alleged Damages:	$4,567.37

Customer Complaint Information

Date Complaint Received:	05/13/2008
Complaint Pending?	No
Status:	Settled
Status Date:	12/16/2008

Settlement Amount:	$10,000.00
Individual Contribution Amount:	$0.00
Broker Statement	IN 8/2002, [BROKER] BECAME THE WRITING/SERVICING AGENT ON AN ACCOUNT FOR [CUSTOMER] WHERE SHE SIGNED UP FOR AND ESTABLISHED A 72T DISTRIBUTION PLAN. IN 4/2004, SHE WITHDREW $10,768 FROM HER ACCOUNT, NULLIFYING HER 72T DISTRIBUTION AND THUS CREATED A TAXABLE EVENT. IN 2005, [BROKER] RESIGNED FROM PFS. 7/12/2006, [CUSTOMER] CAME INTO MY OFFICE TO WITHDRAW $450 FROM HER ACCOUNT AND SHE WAS TOLD THAT THIS WOULD NULLIFY HER 72T DISTRIBUTION. I WAS UNABLE TO SERVICE HER ACCOUNT AS I WAS NOT THE REP OF RECORD. ON 7/13/2006, [CUSTOMER] SIGNED A BROKER DEALER/REP CHANGE LISTING ME, [THIRD PARTY], AS THE AGENT OF RECORD FOR THE FIRST TIME. I BEGAN AT THAT POINT ASSISTING AND DIRECTING [CUSTOMER] IN CORRECTING HER PROBLEM CREATED BY HER WITHDRAWING ADDITIONAL FUNDS OFF OF HER IRA OVER AND ABOVE HER 72T DISTRIBUTION. THIS WAS AN "INHERITED" ACCOUNT, BUT PFS SETTLED A CLAIM IN MY NAME IN 2008 FOR A TRADE I DID NOT DO, ON AN ACCOUNT WITHDRAWL THAT I WAS NOT INVOLVED IN AND ON AN ACCOUNT THAT I COULD NOT ACCESS DATA ON UNTIL I WAS PUT AS THE AGENT OF RECORD LITERALLY 27 MONTHS AFTER THE TRIGGERING EVENT OF THIS COMPLAINT OCCURRED.

End of Report

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