



IAPD Report

STEPHEN GLEN ZAHORIAN JR

CRD# 1628835

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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

STEPHEN GLEN ZAHORIAN JR (CRD# 1628835)

The report summary provides an overview of the representative's professional background and conduct. The information contained in this report has been provided by the representative, investment adviser and/or securities firms, and/or securities regulators as part of the states' investment adviser registration and licensing process. The information contained in this report was last updated by the representative, a previous employing firm, or a securities regulator on **04/22/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	CETERA WEALTH SERVICES, LLC	CRD# 13572	09/03/2019
IA	CETERA INVESTMENT ADVISERS LLC	CRD# 105644	06/02/2023

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **18** 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	CETERA ADVISOR NETWORKS LLC	13572	FORT MYERS, FL	03/12/2021 - 06/29/2023
IA	SUMMIT FINANCIAL GROUP INC	109485	FT. MYERS, FL	11/18/2013 - 05/20/2021
B	SUMMIT BROKERAGE SERVICES, INC.	34643	FORT MYERS, FL	11/08/2013 - 09/20/2019

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	2
Termination	2



Qualifications

REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works. This individual is currently registered with **18** jurisdiction(s) and 1 SRO(s) through his or her employer(s).

Employment 1 of 2

Firm Name: **CETERA WEALTH SERVICES, LLC**

Main Address: 2301 ROSECRANS AVE #5100
EL SEGUNDO, CA 90245

Firm ID#: 13572

	Regulator	Registration	Status	Date
B	FINRA	General Securities Representative	Approved	09/03/2019
B	FINRA	General Securities Sales Supervisor	Approved	09/03/2019
B	Arizona	Agent	Approved	02/01/2024
B	Connecticut	Agent	Approved	05/12/2022
B	Florida	Agent	Approved	09/18/2019
B	Georgia	Agent	Approved	09/20/2019
B	Idaho	Agent	Approved	04/24/2026
B	Illinois	Agent	Approved	03/11/2020
B	Iowa	Agent	Approved	01/05/2022
B	Kentucky	Agent	Approved	09/20/2019
B	Maryland	Agent	Approved	04/22/2021
B	Michigan	Agent	Approved	09/20/2019
B	New Hampshire	Agent	Approved	02/27/2025



Qualifications

	Regulator	Registration	Status	Date
B	New York	Agent	Approved	09/20/2019
B	North Carolina	Agent	Approved	09/20/2019
B	South Carolina	Agent	Approved	04/19/2024
B	Tennessee	Agent	Approved	02/12/2026
B	Texas	Agent	Approved	09/20/2019
B	Utah	Agent	Approved	01/06/2023
B	Virginia	Agent	Approved	08/13/2020

Branch Office Locations

CETERA ADVISOR NETWORKS LLC
2029 BAYSIDE PARKWAY
FORT MYERS, FL 33901

Employment 2 of 2

Firm Name: **CETERA INVESTMENT ADVISERS LLC**
Main Address: 1450 AMERICAN LANE
6TH FLOOR, SUITE 650
SCHAUMBURG, IL 60173-2096
Firm ID#: 105644

	Regulator	Registration	Status	Date
IA	Florida	Investment Adviser Representative	Approved	06/02/2023
IA	Texas	Investment Adviser Representative	Restricted Approval	06/29/2023

Branch Office Locations

CETERA INVESTMENT ADVISERS LLC
2029 BAYSIDE PARKWAY
FORT MYERS, FL 33901



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

Principal/Supervisory Exams

	Exam	Category	Date
	General Securities Sales Supervisor - General Module Examination (S10)	Series 10	11/06/2012
	General Securities Sales Supervisor - Options Module Examination (S9)	Series 9	08/23/2012

General Industry/Product Exams

	Exam	Category	Date
	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
	General Securities Representative Examination (S7)	Series 7	04/25/1987

State Securities Law Exams

	Exam	Category	Date
 	Uniform Combined State Law Examination (S66)	Series 66	12/27/2005
	Uniform Securities Agent State Law Examination (S63)	Series 63	05/27/1987

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	03/12/2021 - 06/29/2023	CETERA ADVISOR NETWORKS LLC	CRD# 13572	FORT MYERS, FL
IA	11/18/2013 - 05/20/2021	SUMMIT FINANCIAL GROUP INC	CRD# 109485	FT. MYERS, FL
B	11/08/2013 - 09/20/2019	SUMMIT BROKERAGE SERVICES, INC.	CRD# 34643	FORT MYERS, FL
IA	06/25/2009 - 11/06/2013	RAYMOND JAMES FINANCIAL SERVICES ADVISORS, INC	CRD# 149018	FT. MYERS, FL
B	08/19/2008 - 11/06/2013	RAYMOND JAMES FINANCIAL SERVICES, INC.	CRD# 6694	FORT MYERS, FL
IA	09/02/2008 - 10/10/2009	RAYMOND JAMES FINANCIAL SERVICES	CRD# 6694	FORT MYERS, FL
IA	12/14/2005 - 08/21/2008	BANC OF AMERICA INVESTMENT SERVICES, INC.	CRD# 16361	FT. MEYERS, FL
B	12/09/2005 - 08/21/2008	BANC OF AMERICA INVESTMENT SERVICES, INC.	CRD# 16361	FT. MEYERS, FL
B	05/01/2000 - 12/14/2005	CITIGROUP GLOBAL MARKETS INC.	CRD# 7059	FORT MYERS, FL
IA	05/01/2000 - 12/14/2005	CITIGROUP GLOBAL MARKETS INC.	CRD# 7059	FORT MYERS, FL
B	04/29/1987 - 05/05/2000	RAYMOND JAMES & ASSOCIATES, INC.	CRD# 705	ST. PETERSBURG, FL

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
03/2023 - Present	CETERA INVESTMENT ADVISERS LLC	INVESTMENT ADVISOR REPRESENTATIVE	Y	SCHAUMBURG, IL, United States
09/2019 - Present	CETERA WEALTH SERVICES, LLC	REGISTERED REPRESENTATIVE	Y	EL SEGUNDO, CA, United States
09/2008 - Present	FAMILY TREE FINANCIAL SERVICES, LLC	PRESIDENT	Y	FORT MYERS, FL, United States



Registration & Employment History



EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
11/2013 - 05/2021	SUMMIT FINANCIAL GROUP INC	INVESTMENT ADVISER REPRESENTATIVE	Y	FT MYERS, FL, United States
11/2013 - 09/2019	SUMMIT BROKERAGE SERVICES INC	REG REP	Y	FT MYERS, FL, 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 OTHER BUSINESS: FAMILY TREE FINANCIAL SERVICES, LLC;
INVESTMENT RELATED: YES;
ADDRESS: SAME AS REGISTERED LOCATION;
NATURE OF BUSINESS: FINANCIAL SERVICES DBA;
START DATE: 09/2008;
POSITION/TITLE/RELATIONSHIP: PRESIDENT;
APX NUMBER OF HOURS PER WEEK: 40;
APX NUMBER OF HOURS DURING TRADING HOURS: 32.5;
BRIEF DESCRIPTION OF DUTIES: FINANCIAL SERVICES;



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	2
Termination	2

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 2

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: RAYMOND JAMES FINANCIAL SERVICES, INC

Allegations: CLIENT ALLEGES FINANCIAL ADVISOR ENTERED INTO A COMMISSION-SHARING ARRANGEMENT IN RETURN FOR CLIENT REFERRALS, OFFICE RENT AND OTHER SERVICES. CLIENT FURTHER ALLEGES FINANCIAL ADVISOR BORROWED MONEY FROM HIM AND TO DATE HAS NOT BEEN REPAYED. CLIENT ALLEGES DAMAGES OF \$78,000.

Product Type: No Product

Alleged Damages: \$78,000.00

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: 08/21/2013

Complaint Pending? No

Status: Denied

Status Date: 10/02/2013

Settlement Amount:

**Individual Contribution Amount:****Broker Statement**

THE CUSTOMER, MY FATHER-IN-LAW HAS HAD A TAX AND ACCOUNTING PRACTICE OVER THE 23 YEARS I HAVE BEEN MARRIED TO HIS DAUGHTER. UNTIL OCTOBER 2011 WE HAD NOT PREVIOUSLY WORKED TOGETHER IN ANY FORMAL WAY. OVER THE YEARS, I HAVE THOUGHT IT BEST TO KEEP WORKING WITH FAMILY MEMBERS AT ARMS-LENGTH.

MY WIFE WENT BACK TO WORK WITH HER DAD IN 2006. MY MOTHER-IN-LAW WAS 6 YEARS INTO A CANCER BATTLE. I SUPPORTED MY WIFE RETURNING TO WORK TO BE CLOSE TO HER DAD TO PROVIDE HIM HELP HE NEEDED. MY MOTHER-IN-LAW PASSED AWAY IN OCT. 2011. JUST PRIOR TO HER PASSING, MY FATHER-IN-LAW APPROACHED ME ABOUT SETTING UP FINANCIAL SERVICES PRESENCE IN HIS OFFICE. RAYMOND JAMES OFFERED FAS THE ABILITY TO ESTABLISH A REGISTERED MEETING LOCATION. IN NOV. 2011, I FOLLOWED THE COMPLIANCE GUIDELINES AND ESTABLISHED A REGISTERED MEETING LOCATION WITHIN HIS PHYSICAL OFFICE SPACE. WHILE WE HAD PASSING CONVERSATION ABOUT RENT WE HAD NO WRITTEN AGREEMENT. WITH MY FATHER-IN-LAWS PROFESSIONAL HISTORY CLOSELY ASSOCIATED WITH THE FINANCIAL SERVICES INDUSTRY, HE WAS AWARE OF THE VARIABLE NATURE OF FA REVENUE.

ON APRIL 29TH, 2013, MY WIFE OF TWENTY TWO YEARS (HIS DAUGHTER AND BUSINESS PARTNER) PRESENTED ME WITH HER INTENT TO DIVORCE. NO PRIOR INDICATION THIS WAS COMING. IT WASN'T LONG BEFORE HE SOUGHT TO INTERJECT HIMSELF INTO OUR MARITAL MATTERS. ON HIS FIRST CALL TO ME HE SAID "STEVE, THIS CAN BE EASY". HE WANTED TO "BROKER THE DEAL". IT WAS VERY UNSETTLING. I DIDN'T BELIEVE THIS WAS A PLACE FOR A FAMILY MEMBER/PARENT TO GET INVOLVED BUT UNFORTUNATELY IT WAS NOT IN HIS NATURE TO NOT GET INVOLVED. HIS INTERFERENCE IN OUR MARITAL MATTERS CULMINATED WITH A CLIENT COMPLAINT LETTER SENT TO RAYMOND JAMES IN AUG 2013. HE VERBALLY ADMITTED OVER THE LAST TWO DAYS THAT HIS MOTIVATION FOR SENDING COMPLAINT LETTER WAS HIS ANGER AND FRUSTRATION OVER ALL THAT MY WIFE WAS HAVING TO COMPLY WITH REGARDING FINANCIAL DISCLOSURE FOR OUR DIVORCE PROCEEDINGS. DUE TO THE WAYS MY WIFE IS ASSOCIATED WITH HIM FINANCIALLY, SOME OF THE REQUESTS FOR DOCUMENTS CROSSED OVER INTO HIS FINANCIAL INFORMATION.

THERE WAS NEVER A FORMAL AGREEMENT REGARDING THE LOAN HE GAVE MY WIFE AND I TO BUY THE HOUSE. AFTER MY WIFE FILED FOR DIVORCE HE WANTED ME TO SIGN A 2ND MORTGAGE NOTE. HE WAS ANGRY I HAD NOT SIGNED IT AND USED IT AS PART OF THE CUSTOMER COMPLAINT. WHILE RAYMOND JAMES DENIED BOTH OF HIS CLAIMS IN A DENIAL LETTER OF OCT 2, 2013, THEY CITED MY VIOLATION OF FIRM POLICIES AS THE BASIS FOR TERMINATION.

Disclosure 2 of 2**Reporting Source:**

Firm

Employing firm when activities occurred which led to the complaint:

RAYMOND JAMES & ASSOCIATES, INC.

Allegations:

MISREPRESENTATION- JANUARY 1999. CLIENT THOUGHT HE PURCHASED A ONE YEAR CD. NO DOLLAR AMOUNT SPECIFIED; FIRM ESTIMATES \$5000.00 OR OVER.

Product Type:

CD(s)



Alleged Damages: \$5,000.00

Customer Complaint Information

Date Complaint Received: 11/08/2000

Complaint Pending? Yes

Settlement Amount:

Individual Contribution

Amount:

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: RAYMOND JAMES AND ASSOCIATES

Allegations: MISREPRESENTATION- JANUARY 1999. CLIENT THOUGHT HE PURCHASED A ONE YEAR CD. NO DOLLAR AMOUNT SPECIFIED. FIRM ESTIMATES \$5000 OR OVER.

Product Type: CD(s)

Alleged Damages: \$5,000.00

Customer Complaint Information

Date Complaint Received: 11/08/2000

Complaint Pending? Yes

Settlement Amount:

Individual Contribution

Amount:



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 2

Reporting Source: Firm

Firm Name: RAYMOND JAMES FINANCIAL SERVICES INC.

Termination Type: Discharged

Termination Date: 11/04/2013

Allegations: FAILURE TO FOLLOW FIRM POLICY REGARDING DISCLOSURE OF A LOAN FROM A CLIENT OR FAMILY MEMBER AND SHARING OF COMMISSION WITH AN UNREGISTERED PERSON.

Product Type: No Product

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Reporting Source: Individual

Firm Name: RAYMOND JAMES FINANCIAL SERVICES ADVISORS INC

Termination Type: Discharged

Termination Date: 11/04/2013

Allegations: FAILURE TO FOLLOW FIRM POLICY REGARDING DISCLOSURE OF A LOAN FROM A CLIENT OR FAMILY MEMBER, AND SHARING OF COMMISSIONS WITH AN UNREGISTERED PERSON.

Product Type: No Product

Broker Statement THE DISCHARGE STEMS FROM THE CUSTOMER COMPLAINT, DENIED BY RAYMOND JAMES, FROM MY FATHER-IN-LAW IN RETALIATION FOR REQUESTS FOR FINANCIAL INFORMATION AS PART OF THE DIVORCE PROCESS. I MARRIED MY WIFE IN NOV. 1990. THE LOAN NOTED IN THE TERMINATION WAS AN UNSOLICITED OFFER FROM MY FATHER-IN-LAW TO HELP MY WIFE AND I PURCHASE OUR HOME. WE ACCEPTED. I FAILED TO DISCLOSE IT TO RAYMOND JAMES IN ADVANCE. IT WAS NOT MY INTENT TO HIDE ANYTHING. I WAS UNAWARE IT NEEDED TO BE REPORTED TO THE FIRM. REFERENCING THE COMMISSION SHARING ACCUSATION, I RENTED OFFICE SPACE FROM MY FATHER-IN-LAW. WHEN WE WERE DECIDING ON A RENTAL RATE HE SUGGESTED A PERCENTAGE OF REVENUE FORMULA. I THOUGHT NOTHING OF IT AND MADE ONE PAYMENT TO HIM. WE HAD NO SIGNED AGREEMENT, JUST A VERBAL DISCUSSION AS WE HAD NOT COME TO COMPLETE TERMS YET AND THIS WAS AMONG FAMILY MEMBERS. HE BROUGHT THIS UP IN THE COMPLAINT AND RAYMOND JAMES CONSIDERED IT "COMMISSION SHARING" AND TERMINATED ME.

Disclosure 2 of 2

Reporting Source: Firm

Firm Name: RAYMOND JAMES FINANCIAL SERVICES INC.

Termination Type: Discharged

Termination Date: 11/04/2013



Allegations: FAILURE TO FOLLOW FIRM POLICY REGARDING DISCLOSURE OF A LOAN FROM A CLIENT OR FAMILY MEMBER AND SHARING OF COMMISSION WITH AN UNREGISTERED PERSON.

Product Type: No Product

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Reporting Source: Individual

Firm Name: RAYMOND JAMES FINANCIAL SERVICES INC

Termination Type: Discharged

Termination Date: 11/04/2013

Allegations: FAILURE TO FOLLOW FIRM POLICY REGARDING DISCLOSURE OF A LOAN FROM A CLIENT OR FAMILY MEMBER, AND SHARING OF COMMISSIONS WITH AN UNREGISTERED PERSON.

Product Type: No Product

Broker Statement THE DISCHARGE STEMS FROM THE CUSTOMER COMPLAINT, DENIED BY RAYMOND JAMES, FROM MY FATHER-IN-LAW IN RETALIATION FOR REQUESTS FOR FINANCIAL INFORMATION AS PART OF THE DIVORCE PROCESS. I MARRIED MY WIFE IN NOV. 1990. THE LOAN NOTED IN THE TERMINATION WAS AN UNSOLICITED OFFER FROM MY FATHER-IN-LAW TO HELP MY WIFE AND I PURCHASE OUR HOME. WE ACCEPTED. I FAILED TO DISCLOSE IT TO RAYMOND JAMES IN ADVANCE. IT WAS NOT MY INTENT TO HIDE ANYTHING. I WAS UNAWARE IT NEEDED TO BE REPORTED TO THE FIRM. REFERENCING THE COMMISSION SHARING ACCUSATION, I RENTED OFFICE SPACE FROM MY FATHER-IN-LAW. WHEN WE WERE DECIDING ON A RENTAL RATE HE SUGGESTED A PERCENTAGE OF REVENUE FORMULA. I THOUGHT NOTHING OF IT AND MADE ONE PAYMENT TO HIM. WE HAD NO SIGNED AGREEMENT, JUST A VERBAL DISCUSSION AS WE HAD NOT COME TO COMPLETE TERMS YET AND THIS WAS AMONG FAMILY MEMBERS. HE BROUGHT THIS UP IN THE COMPLAINT AND RAYMOND JAMES CONSIDERED IT "COMMISSION SHARING" AND TERMINATED ME.



End of Report

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