



IAPD Report

KURT JAMES HALVERSTADT

CRD# 1829540

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Qualifications	2 - 4
Registration and Employment History	5 - 6
Disclosure Information	7

i 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

KURT JAMES HALVERSTADT (CRD# 1829540)

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 **12/04/2024**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	THE SULLIVAN GROUP	CRD# 150705	09/02/2009
B	PURSHE KAPLAN STERLING INVESTMENTS	CRD# 35747	09/17/2009

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
B	MORGAN STANLEY SMITH BARNEY	149777	ROSEVILLE, CA	06/01/2009 - 09/14/2009
IA	MORGAN STANLEY SMITH BARNEY LLC	149777	ROSEVILLE, CA	06/01/2009 - 09/14/2009
B	MORGAN STANLEY & CO. INCORPORATED	8209	ROSEVILLE, CA	12/17/2007 - 06/01/2009

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
Judgment/Lien	8



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: **PURSHE KAPLAN STERLING INVESTMENTS**
Main Address: 80 STATE STREET
ALBANY, NY 12207
Firm ID#: 35747

Regulator	Registration	Status	Date
B FINRA	General Securities Representative	Approved	09/17/2009
B Arizona	Agent	Approved	09/17/2009
B California	Agent	Approved	09/17/2009
B Nevada	Agent	Approved	09/17/2009
B Oklahoma	Agent	Approved	03/29/2010
B Texas	Agent	Approved	09/17/2009
B Washington	Agent	Approved	09/17/2009

Branch Office Locations

564 N. SUNRISE AVENUE
ROSEVILLE, CA 95661
Granite Bay, CA

Employment 2 of 2

Firm Name: **THE SULLIVAN GROUP**
Main Address: 564 NORTH SUNRISE AVENUE
ROSEVILLE, CA 95661
Firm ID#: 150705



Qualifications

Regulator	Registration	Status	Date
IA California	Investment Adviser Representative	Approved	09/02/2009

Branch Office Locations

THE SULLIVAN GROUP
564 NORTH SUNRISE AVENUE
ROSEVILLE, CA 95661



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

Principal/Supervisory Exams

Exam	Category	Date
Investment Company Products/Variable Contracts Principal Examination (S26)	Series 26	08/23/1989

General Industry/Product Exams

Exam	Category	Date
Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
General Securities Representative Examination (S7)	Series 7	03/12/1992
Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	06/02/1988

State Securities Law Exams

Exam	Category	Date
Uniform Investment Adviser Law Examination (S65)	Series 65	01/16/2001
Uniform Securities Agent State Law Examination (S63)	Series 63	04/01/1992

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
B	06/01/2009 - 09/14/2009	MORGAN STANLEY SMITH BARNEY	CRD# 149777	ROSEVILLE, CA
IA	06/01/2009 - 09/14/2009	MORGAN STANLEY SMITH BARNEY LLC	CRD# 149777	ROSEVILLE, CA
B	12/17/2007 - 06/01/2009	MORGAN STANLEY & CO. INCORPORATED	CRD# 8209	ROSEVILLE, CA
IA	12/17/2007 - 06/01/2009	MORGAN STANLEY & CO. INCORPORATED	CRD# 8209	ROSEVILLE, CA
IA	01/14/2002 - 12/19/2007	WACHOVIA SECURITIES, LLC	CRD# 19616	ROSEVILLE, CA
B	12/14/2001 - 12/19/2007	WACHOVIA SECURITIES, LLC	CRD# 19616	ROSEVILLE, CA
B	05/02/2001 - 12/13/2001	WELLS FARGO INVESTMENTS, LLC	CRD# 10582	SAN FRANCISCO, CA
B	10/29/1999 - 05/02/2001	WELLS FARGO SECURITIES INC.	CRD# 17438	SAN FRANCISCO, CA
B	07/26/1996 - 11/05/1999	FIRST UNION SECURITIES, INC.	CRD# 19616	ST. LOUIS, MO
B	07/31/1993 - 08/08/1996	SMITH BARNEY INC.	CRD# 7059	NEW YORK, NY
B	05/14/1993 - 07/31/1993	LEHMAN BROTHERS INC.	CRD# 7506	NEW YORK, NY
B	01/28/1992 - 05/18/1993	PRUDENTIAL SECURITIES INCORPORATED	CRD# 7471	NEW YORK, NY
B	06/03/1988 - 04/14/1992	FIRST AMERICAN NATIONAL SECURITIES, INC.	CRD# 10111	DULUTH, GA

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
09/2009 - Present	CAPITAL INVESTMENT MANAGEMENT, LLC, DBA THE SULLIVAN GROUP	CHIEF COMPLIANCE OFFICER	Y	ROSEVILLE, CA, United States



Registration & Employment History

EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
09/2009 - Present	PURSHE KAPLAN STERLING INVESTMENTS	REGISTERED REPRESENTATIVE	Y	ALBANY, NY, 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) CAPITAL INVESTMENT MANAGEMENT, LLC; INVESTMENT RELATED; 564 N SUNRISE AVE ROSEVILLE, CA 95661; INVESTMENT MANAGEMENT; MANAGING DIRECTOR; 10/2009; 120 HOURS/MONTH; 80 HOURS/MONTH DURING SECURITIES HOURS; MANAGE INVESTMENTS FOR CLIENTS
- 2) Brightstar Insurance Partners Insurance Services. Not Investment Related. 1957 Tyndrum Lane, Folsom CA 95630. Insurance Sales. Rep. Start 02/2020. 25 hours per month during trading. Prospecting for potential clients with life insurance needs.



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
Judgment/Lien	8

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: Firm

Employing firm when activities occurred which led to the complaint: WACHOVIA SECURITIES, LLC

Allegations: VERBAL COMPLAINT - CA RESIDENT BECAME AWARE THAT FROM MAY 26, 2006 THROUGH MAY 31, 2006 HE HAD BEEN CHARGED A SALES CHARGE TO SELL STOCKS AND MUNICIPAL BONDS BEFORE THE ASSETS WERE MOVED INTO THE FIRM'S FEE-BASED ASSET ADVISORY ACCOUNTS. THE FIRM REIMBURSED THE CLIENT FOR \$63,347.44 IN FEES.

Product Type: Debt - Municipal

Alleged Damages: \$63,347.44

Customer Complaint Information

Date Complaint Received: 01/18/2008

Complaint Pending? No

Status: Settled

Status Date: 04/10/2008

Settlement Amount: \$63,347.44

Individual Contribution Amount: \$0.00

Reporting Source: Individual



Employing firm when activities occurred which led to the complaint: WACHOVIA SECURITIES, LLC

Allegations: VERBAL COMPLAINT - CA RESIDENT BECAME AWARE THAT FROM MAY 26, 2006 THROUGH MAY 31, 2006 HE HAD BEEN CHARGED A SALES CHARGE TO SELL STOCKS AND MUNICIPAL BONDS BEFORE THE ASSETS WERE MOVED INTO THE FIRM'S FEE-BASED ASSET ADVISORY ACCOUNTS. THE FIRM REIMBURSED THE CLIENT FOR \$63,347.44 IN FEES.

Product Type: Debt-Municipal

Alleged Damages: \$63,347.44

Is this an oral complaint? Yes

Is this a written complaint? No

Is this an arbitration/CFTC reparation or civil litigation? No

Customer Complaint Information

Date Complaint Received: 01/18/2008

Complaint Pending? No

Status: Settled

Status Date: 04/10/2008

Settlement Amount: \$63,347.44

Individual Contribution Amount: \$0.00

Broker Statement WACHOVIA NEVER CONTACTED KURT HALVERSTADT REGARDING THIS MATTER. WACHOVIA'S ACTIONS OF NOT CONTACTING KURT ARE INDICATIONS THAT THIS WAS AN OPERATIONAL MATTER AND SHOULD NOT BE REFLECTED ON KURT'S CRD.

Disclosure 2 of 2

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: FIRST UNION SECURITIES

Allegations: UNAUTHORIZED AND UNSUITABLE TRADING. DAMAGES WERE NOT ALLEGED BUT ARE REASONABLY CALCULATED TO BE IN ACCESS OF \$5,000.00.

Product Type: Mutual Fund(s)

Other Product Type(s): STOCKS

Alleged Damages: \$5,000.00

Customer Complaint Information

Date Complaint Received: 12/06/1999

Complaint Pending? No

Status: Denied

Status Date: 12/21/1999



Settlement Amount:

**Individual Contribution
Amount:**



Judgment/Lien

This disclosure event involves an unsatisfied and outstanding judgment or lien against the Investment Adviser Representative.

Disclosure 1 of 8

Reporting Source:	Individual
Judgment/Lien Holder:	State of California
Judgment/Lien Amount:	\$18,029.32
Judgment/Lien Type:	Tax
Date Filed with Court:	06/29/2024
Date Individual Learned:	08/13/2024
Type of Court:	State Court
Name of Court:	CA State Court
Location of Court:	Sacramento CA
Docket/Case #:	2024-0034901
Judgment/Lien Outstanding?	Yes
Broker Statement	This is an extension of a previously disclosed lien for tax year 2013.

Disclosure 2 of 8

Reporting Source:	Individual
Judgment/Lien Holder:	IRS
Judgment/Lien Amount:	\$83,922.00
Judgment/Lien Type:	Tax
Date Filed with Court:	10/17/2018
Date Individual Learned:	12/03/2018
Type of Court:	State Court
Name of Court:	Placer County Court
Location of Court:	Placer County California
Docket/Case #:	2018007543500
Judgment/Lien Outstanding?	Yes

Disclosure 3 of 8

Reporting Source:	Individual
Judgment/Lien Holder:	State of California
Judgment/Lien Amount:	\$110,043.68
Judgment/Lien Type:	Tax
Date Filed with Court:	06/05/2018
Date Individual Learned:	12/03/2018
Type of Court:	State Court



Name of Court: Placer County Court
Location of Court: Placer County California
Docket/Case #: 2018-0039835
Judgment/Lien Outstanding? Yes

Disclosure 4 of 8

Reporting Source: Individual
Judgment/Lien Holder: State of California
Judgment/Lien Amount: \$48,163.00
Judgment/Lien Type: Tax
Date Filed with Court: 05/23/2013
Date Individual Learned: 11/25/2015
Type of Court: Tax lien filed
Name of Court: Placer County Recorder
Location of Court: Placer County, California
Docket/Case #: 2013005045900
Judgment/Lien Outstanding? Yes

Broker Statement THIS TAX LIEN RELATES TO AND IS A RESULT OF THE PREVIOUSLY DISCLOSED CIVIL LITIGATION RE: MORGAN STANLY AND THE RESULTING BANKRUPTCY ACTION.

Disclosure 5 of 8

Reporting Source: Individual
Judgment/Lien Holder: State of California
Judgment/Lien Amount: \$13,855.00
Judgment/Lien Type: Tax
Date Filed with Court: 01/30/2014
Date Individual Learned: 11/25/2015
Type of Court: Tax lien filed
Name of Court: Placer County Recorder
Location of Court: Placer County, California
Docket/Case #: 2014000627500
Judgment/Lien Outstanding? Yes

Broker Statement THIS TAX LIEN RELATES TO AND IS A RESULT OF THE PREVIOUSLY DISCLOSED CIVIL LITIGATION RE: MORGAN STANLY AND THE RESULTING BANKRUPTCY ACTION.

Disclosure 6 of 8

Reporting Source: Individual



Judgment/Lien Holder: IRS
Judgment/Lien Amount: \$170,759.00
Judgment/Lien Type: Tax
Date Filed with Court: 02/11/2014
Date Individual Learned: 11/25/2015
Type of Court: Tax lien filed
Name of Court: Placer County Recorder
Location of Court: Placer County, California
Docket/Case #: 2014000904900
Judgment/Lien Outstanding? Yes
Broker Statement THIS TAX LIEN RELATES TO AND IS A RESULT OF THE PREVIOUSLY DISCLOSED CIVIL LITIGATION RE: MORGAN STANLY AND THE RESULTING BANKRUPTCY ACTION.

Disclosure 7 of 8

Reporting Source: Individual
Judgment/Lien Holder: IRS
Judgment/Lien Amount: \$45,575.00
Judgment/Lien Type: Tax
Date Filed with Court: 03/05/2015
Date Individual Learned: 11/25/2015
Type of Court: Tax lien filed
Name of Court: Placer County Recorder
Location of Court: Placer County, California
Docket/Case #: 2014007426100
Judgment/Lien Outstanding? Yes
Broker Statement THIS TAX LIEN RELATES TO AND IS A RESULT OF THE PREVIOUSLY DISCLOSED CIVIL LITIGATION RE: MORGAN STANLY AND THE RESULTING BANKRUPTCY ACTION.

Disclosure 8 of 8

Reporting Source: Individual
Judgment/Lien Holder: IRS
Judgment/Lien Amount: \$47,656.00
Judgment/Lien Type: Tax
Date Filed with Court: 08/17/2015
Date Individual Learned: 11/25/2015
Type of Court: Tax lien filed
Name of Court: Placer County Recorder



Location of Court:	Placer County, California
Docket/Case #:	2015007129000
Judgment/Lien Outstanding?	Yes
Broker Statement	THIS TAX LIEN RELATES TO AND IS A RESULT OF THE PREVIOUSLY DISCLOSED CIVIL LITIGATION RE: MORGAN STANLY AND THE RESULTING BANKRUPTCY ACTION.



End of Report

This page is intentionally left blank.