



IAPD Report

HERBERT SUEKICHI SHIRAISHI

CRD# 1835557

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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

HERBERT SUEKICHI SHIRAISHI (CRD# 1835557)

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 **01/02/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	SHIRAISHI FINANCIAL GROUP ADVISORS	CRD# 168645	01/17/2014
B	INDEPENDENT FINANCIAL GROUP, LLC	CRD# 7717	12/09/2016

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
B	UNITED PLANNERS' FINANCIAL SERVICES OF AMERICA A LIMITED PARTNER	20804	HONOLULU, HI	04/29/2013 - 12/09/2016
IA	UNITED PLANNERS' FINANCIAL SERVICES OF AMERICA A LIMITED PARTNER	20804	HONOLULU, HI	05/31/2013 - 11/13/2014
IA	SECURITIES AMERICA ADVISORS, INC.	110518	HONOLULU, HI	01/23/2009 - 05/09/2013

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

Employment 1 of 2

Firm Name: **INDEPENDENT FINANCIAL GROUP, LLC**
Main Address: 12671 HIGH BLUFF DR
SUITE 200
SAN DIEGO, CA 92130
Firm ID#: 7717

Regulator	Registration	Status	Date
B FINRA	Invest. Co and Variable Contracts	Approved	12/09/2016
B Arizona	Agent	Approved	10/26/2022
B California	Agent	Approved	12/09/2016
B Colorado	Agent	Approved	06/23/2020
B Florida	Agent	Approved	01/06/2026
B Hawaii	Agent	Approved	12/14/2016
B Illinois	Agent	Approved	12/09/2016
B Indiana	Agent	Approved	06/12/2023
B Louisiana	Agent	Approved	09/27/2021
B Michigan	Agent	Approved	12/09/2016
B Nebraska	Agent	Approved	10/17/2022
B Nevada	Agent	Approved	02/13/2017
B North Carolina	Agent	Approved	12/09/2016



Qualifications

Regulator	Registration	Status	Date
B Ohio	Agent	Approved	04/09/2021
B Oregon	Agent	Approved	12/19/2016
B Texas	Agent	Approved	12/09/2016
B Utah	Agent	Approved	12/09/2016
B Virginia	Agent	Approved	12/09/2016
B Washington	Agent	Approved	12/09/2016

Branch Office Locations

INDEPENDENT FINANCIAL GROUP, LLC
 1357 Kapiolani Blvd
 Ste 1140
 Honolulu, HI 96814

INDEPENDENT FINANCIAL GROUP, LLC
 116 Hualalai Street #100
 Hilo, HI 96720

Employment 2 of 2

Firm Name: **SHIRAIISHI FINANCIAL GROUP ADVISORS**
 Main Address: 1357 KAPIOLANI BLVD
 STE 1140
 HONOLULU, HI 96814
 Firm ID#: 168645

Regulator	Registration	Status	Date
IA Hawaii	Investment Adviser Representative	Approved	01/17/2014
IA Texas	Investment Adviser Representative	Restricted Approval	02/05/2020

Branch Office Locations

SHIRAIISHI FINANCIAL GROUP ADVISORS
 1357 KAPIOLANI BLVD
 STE 1140
 HONOLULU, HI 96814




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
 Investment Company Products/Variable Contracts Principal Examination (S26)	Series 26	03/10/2000

General Industry/Product Exams

Exam	Category	Date
 Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
 Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	07/06/1988

State Securities Law Exams

Exam	Category	Date
 Uniform Investment Adviser Law Examination (S65)	Series 65	09/27/1999
 Uniform Securities Agent State Law Examination (S63)	Series 63	11/30/1998

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	04/29/2013 - 12/09/2016	UNITED PLANNERS' FINANCIAL SERVICES OF AMERICA A LIMITED PARTNER	CRD# 20804	HONOLULU, HI
IA	05/31/2013 - 11/13/2014	UNITED PLANNERS' FINANCIAL SERVICES OF AMERICA A LIMITED PARTNER	CRD# 20804	HONOLULU, HI
IA	01/23/2009 - 05/09/2013	SECURITIES AMERICA ADVISORS, INC.	CRD# 110518	HONOLULU, HI
B	01/23/2009 - 05/09/2013	SECURITIES AMERICA, INC.	CRD# 10205	HONOLULU, HI
B	01/07/2008 - 01/23/2009	BRECEK & YOUNG ADVISORS, INC.	CRD# 40395	HONOLULU, HI
IA	01/07/2008 - 01/23/2009	BRECEK & YOUNG ADVISORS, INC.	CRD# 40395	HONOLULU, HI
IA	03/12/2001 - 01/29/2008	LPL FINANCIAL CORPORATION	CRD# 6413	HONOLULU, HI
B	09/25/2000 - 01/29/2008	LPL FINANCIAL CORPORATION	CRD# 6413	HONOLULU, HI
B	11/19/1998 - 09/28/2000	SUNAMERICA SECURITIES, INC.	CRD# 20068	PHOENIX, AZ
B	10/15/1993 - 11/19/1998	AETNA INVESTMENT SERVICES, INC.	CRD# 34815	WINDSOR, CT
B	10/23/1991 - 10/15/1993	AETNA LIFE INSURANCE AND ANNUITY COMPANY	CRD# 13256	HARTFORD, CT
B	07/08/1988 - 02/11/1992	JOHN HANCOCK DISTRIBUTORS, INC.	CRD# 468	BOSTON, MA
B	07/08/1988 - 02/11/1992	JOHN HANCOCK MUTUAL LIFE INSURANCE COMPANY	CRD# 5181	BOSTON, MA

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
12/2016 - Present	Independent Financial Group, LLC	Financial Advisor	Y	Honolulu, HI, United States



Registration & Employment History

EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
01/2014 - Present	SFGA LLC	PRESIDENT/MANAGING MEMBER	Y	HONOLULU, HI, United States
07/2013 - Present	SHIRAISHI FINANCIAL GROUP ADVISORS	PRESIDENT	Y	HONOLULU, HI, United States
08/2005 - Present	HERBERT SHIRAISHI, LANDLORD	OWNER	N	HILO, HI, United States
10/2000 - Present	SFG, LTD.	AGENT	Y	HONOLULU, HI, United States
04/2013 - 12/2016	UNITED PLANNERS' FINANCIAL SERVICES	REGISTERED REP	Y	SCOTTSDALE, AZ, 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) INSURANCE

POSITION: Officer/Director NATURE: Insurance outside of IFG INVESTMENT RELATED: No NUMBER OF HOURS: 16
 SECURITIES TRADING HOURS: 0 START DATE: 10/01/2000
 ADDRESS: 1357 Kapiolani Blvd, Ste 1140, Honolulu HI 96814, United States
 DESCRIPTION: 100% OWNER & HAWAII LICENSED INSURANCE AGENT OF SFG, LTD. OFFERING INSURANCE SALES AND SERVICES SINCE 10/2000. NON INVESTMENT RELATED. APPROXIMATELY 10% OF TIME SPENT. BUSINESS CONDUCTED AT ADDRESS OF RECORD.

(2) SFGA LLC

POSITION: Officer/Director NATURE: Outside Registered Investment Advisor/Outside IAR INVESTMENT RELATED: Yes
 NUMBER OF HOURS: 48 SECURITIES TRADING HOURS: 10 START DATE: 01/01/2014
 ADDRESS: 1357 Kapiolani Blvd, Ste 1140, Honolulu HI 96814, United States
 DESCRIPTION: 100% OWNER & AGENT OF SFGA LLC, A SEC REGISTERED INVESTMENT ADVISOR, OFFERING ADVISORY SERVICES SINCE 1/2014. INVESTMENT RELATED. APPROXIMATELY 30% OF TIME SPENT. BUSINESS CONDUCTED AT ADDRESS OF RECORD.

(3) LANDLORD

POSITION: Landlord NATURE: Real Estate Sales/Rental Properties/Property Management INVESTMENT RELATED: No
 NUMBER OF HOURS: 2 SECURITIES TRADING HOURS: 0 START DATE: 08/01/2005
 ADDRESS: 1357 Kapiolani Blvd, Ste 1140, Honolulu HI 96814, United States
 DESCRIPTION: OWNER & LANDLORD OFFERING PROPERTY MANAGEMENT SERVICES SINCE 8/2005. NOT INVESTMENT RELATED. LESS THAN 10% OF TIME SPENT. BUSINESS CONDUCTED AT ADDRESS OF RECORD.

(4) MEDICARE SPECIALIST PRESENTING TO

POSITION: Officer/Director NATURE: Teaching/Coaching INVESTMENT RELATED: No NUMBER OF HOURS: 1 SECURITIES TRADING HOURS: 0 START DATE: 06/07/2018
 ADDRESS: 1357 Kapiolani Blvd, Ste 1140, Honolulu HI 96814, United States
 DESCRIPTION: (5) PARTNERSHIP WITH MEDICARE SPECIALIST PRESENTING TO CLIENTS SINCE 6/7/2018. NON-INVESTMENT RELATED. 1% OF TIME SPENT. ACTIVITY CONDUCTED AT BUSINESS ADDRESS OF RECORD.



Registration & Employment History



OTHER BUSINESS ACTIVITIES

(5) OFFICE SHARING

POSITION: Officer/Director NATURE: Insurance outside of IFG INVESTMENT RELATED: No NUMBER OF HOURS: 1
SECURITIES TRADING HOURS: 0 START DATE: 05/01/2018

ADDRESS: 1357 Kapiolani Blvd, Ste 1140, Honolulu HI 96814, United States

DESCRIPTION: (4) OFFICE SHARING WITH AFLAC INSURANCE SALESPERSON SINCE 5/2018. NON-INVESTMENT RELATED. 1% TIME SPENT. ACTIVITY CONDUCTED AT OFFICE ADDRESS OF RECORD.

(7) YOUNGLIFE OAHU

POSITION: Volunteer NATURE: Volunteer INVESTMENT RELATED: No NUMBER OF HOURS: 1 SECURITIES TRADING
HOURS: 0 START DATE: 01/01/2009

ADDRESS: 1357 Kapiolani Blvd, Ste 1140, Honolulu HI 96814, United States

DESCRIPTION: VOLUNTEER FOR YOUNGLIFE OAHU SINCE 2009. NON-INVESTMENT RELATED. LESS THAN 1% OF TIME SPENT. BUSINESS CONDUCTED AT OFFICE ADDRESS OF RECORD.



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	4
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 4

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	Independent Financial Group, LLC
Allegations:	Client alleges investment is unsuitable
Product Type:	Annuity-Variable
Alleged Damages:	\$25,500.00
Alleged Damages Amount Explanation (if amount not exact):	Complaint does not contain a dollar amount. Client has asked for rescission of policy. Amount listed is amount of surrender charge client would have to pay. Total investment was \$370,000 (\$202,000 from one policy and \$168,000 from another).
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:	05/14/2018
Complaint Pending?	No
Status:	Closed/No Action
Status Date:	08/24/2018

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

Customer claims investment was not suitable and is asking for rescission. Preliminary investigation reveals step-up in benefits with new policy. Issue being closed as BD has not received any communication from the client.

Disclosure 2 of 4**Reporting Source:**

Individual

Employing firm when activities occurred which led to the complaint:

Shiraishi Financial Group Advisors and United Planners Financial Services

Allegations:

CLIENT ALLEGED VARIABLE ANNUITY COMMISSIONS WERE NOT ADEQUATELY DISCLOSED. SOUGHT A CREDIT AGAINST FUTURE ADVISORY FEES. HOWEVER, CLIENT CHANGED BROKER/DEALERS AND WANTED A REFUND OF THE CREDIT.

Product Type:

Annuity-Variable

Alleged Damages:

\$0.00

Alleged Damages Amount Explanation (if amount not exact):

No amount of damages were alleged. However the amount could be greater than \$5000.

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:** 01/19/2017**Complaint Pending?** No**Status:** Closed/No Action**Status Date:** 04/22/2019**Settlement Amount:****Individual Contribution Amount:****Broker Statement**

ALL VARIABLE ANNUITY, M&E AND EXPENSES WERE FULLY DISCLOSED TO THE CLIENT PRIOR TO THE CLIENT SIGNING THE APPLICATION. COMMISSION DOES NOT COME OUT OF THE CLIENT'S ACCOUNT. CLIENT PAYS M&E AND ADMIN FEES ON THE VARIABLE ANNUITY.

Disclosure 3 of 4**Reporting Source:**

Firm

Employing firm when activities occurred which led to the complaint:

United Planners Financial Services

Allegations:

Client claimed that he was not informed of his options when he purchased a



variable annuity and requested the policy to be cancelled with no CDSC.

Product Type: Annuity-Variable

Alleged Damages: \$7,708.00

Alleged Damages Amount Explanation (if amount not exact): The above referenced number is believed to be the CDSC for the purchase.

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: 01/23/2017

Complaint Pending? No

Status: Denied

Status Date: 02/15/2017

Settlement Amount:

Individual Contribution Amount:

Firm Statement The firm reviewed the matter and determined that the client was fully disclosed of the reasons the purchase was recommended and denied the claim. The review noted the client signed firm and sponsor company paperwork as well as a self created summary by the RR explaining why the product was recommended.

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Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: UNITED PLANNERS FINANCIAL SERVICES

Allegations: CLIENT CLAIMED HE WAS NOT INFORMED OF HIS OPTIONS WHEN HE PURCHASED A VARIABLE ANNUITY AND REQUESTED THE POLICY TO BE CANCELLED WITH NO CDSC.

Product Type: Annuity-Variable

Alleged Damages: \$7,708.00

Alleged Damages Amount Explanation (if amount not exact): THE AMOUNT IS BELIEVED TO BE THE CDSC FOR THE PURCHASE.

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: 01/23/2017

Complaint Pending? No



Status: Denied

Status Date: 02/15/2017

Settlement Amount:

Individual Contribution Amount:

Broker Statement UNITED PLANNERS REVIEWED THE MATTER AND DETERMINED THAT THE CLIENT WAS FULLY DISCLOSED OF THE REASONS THE PURCHASE WAS RECOMMENDED AND THE FIRM DENIED THE CLAIM. THE REVIEW NOTED THE CLIENT SIGNED FIRM AND SPONSOR COMPANY PAPERWORK AS WELL AS A SUMMARY CREATED BY THE RR EXPLAINING WHY THE PRODUCT WAS RECOMMENDED.

Disclosure 4 of 4

Reporting Source: Individual

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

Allegations: CLIENT SENT COMPLAINT TO STATE OF HAWAII ALLEGING UNSUITABLE INVESTMENTS REGARDING HER VARIABLE LIFE INSURANCE PRODUCT.

Product Type: Insurance

Alleged Damages: \$5,000.00

Alleged Damages Amount Explanation (if amount not exact): CLIENT IS NOT ALLEGING AN EXACT AMOUNT, BUT THE FIRM CANNOT MAKE A GOOD FAITH DETERMINATION THAT THE DAMAGES WOULD BE LESS THAN \$5,000.

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: 11/06/2009

Complaint Pending? No

Status: Closed/No Action

Status Date: 04/23/2010

Settlement Amount:

Individual Contribution Amount:

Broker Statement THE VARIABLE LIFE INSURANCE PRODUCT IN QUESTION WAS SUITABLE BASED ON THE CLIENT'S SITUATION, EXPERIENCE AND UNDERSTANDING OF THE PRODUCT AND INVESTMENTS. WE BELIEVE THE CLIENT COMPLAINT IS NOT VALID AND HAVE RESPONDED TO THE STATE OF HAWAII WITH THE FACTS, COPIES OF DOCUMENTS AND EXPLANATION OF THE CASE TO SUPPORT THIS.



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: Firm
Firm Name: LPL FINANCIAL CORPORTION
Termination Type: Permitted to Resign
Termination Date: 01/07/2008
Allegations: FAILURE TO FOLLOW FIRM POLICIES AND PROCEDURES, WITH RESPECT TO ADVERTISING AND ADVISORY BUSINESS.
Product Type: No Product
Other Product Types:

Reporting Source: Individual
Firm Name: LPL FINANCIAL CORPORATION
Termination Type: Permitted to Resign
Termination Date: 01/07/2008
Allegations: FAILURE TO FOLLOW FIRM POLICIES AND PROCEDURES, WITH RESPECT TO ADVERTISING AND ADVISORY BUSINESS.
Product Type: No Product
Other Product Types:

Broker Statement

I WAS AN ADVISOR WORKING AT LPL FROM 2000 - 2007. DURING THE LAST 2 YEARS THAT I WAS WITH THEM, I SUBMITTED A WRITTEN REQUEST TO HIRE A SALARIED INDEPENDENT CONSULTANT WITHIN MY BRANCH. PRIOR TO JOINING MY BRANCH, THIS INDIVIDUAL HAD PROVIDED CONSULTING SERVICES FOR A WELL-KNOWN INDIVIDUAL, AND WAS RECOGNIZED WITHIN THE INDUSTRY AS AN EXPERT IN ECONOMICS AND FINANCIAL MARKETS. I INTENDED TO USE THIS INDIVIDUAL TO DISCUSS MARKET CONDITIONS WITH MY CLIENTS, WHERE APPLICABLE. FOLLOWING MY REQUEST TO LPL TO HIRE THIS INDIVIDUAL, I RECEIVED WRITTEN PERMISSION TO PROCEED. FOR THE NEXT 24 MONTHS, THIS PERSON ASSISTED ME ON AN AS-NEEDED BASIS ON CLIENT QUESTIONS AND ASSET ALLOCATION ON THE ECONOMY AND OTHER FINANCIAL MARKET CONCERNS, SOME TIMES PARTICIPATING IN SEMINARS AND CLIENT MEETINGS. DURING THE COURSE OF A BRANCH AUDIT, LPL BELIEVED THAT THE ANALYST WAS ACTING BEYOND THE REQUESTED SCOPE OF WORK AND CITED ME FOR NOT FULLY DISCLOSING THE ANALYST'S JOB DUTIES. HOWEVER, THE LIMITATIONS OF MY EMPLOYEE'S RESPONSIBILITIES WAS NEVER FULLY DISCLOSED TO ME AND I WAS UNAWARE OF THE LIMITATIONS THAT LPL HAD PLACED ON THE ANALYST'S JOB DUTIES. I NEVER WOULD HAVE ALLOWED MY EMPLOYEE TO DISREGARD ANY RULES AND CLEARLY FELT IT WAS A MISUNDERSTANDING. UNFORTUNATELY, LPL DID NOT SEE IT AS SUCH AND THE SITUATION ESCALATED TO THE POINT THAT LPL AND I DECIDED TO "PART WAYS" . IN DOING SO I WAS LED TO BELIEVE THAT MY LEAVING



LPL WOULD BE CONSIDERED A "VOLUNTARY RESIGNATION" ON MY U4. HOWEVER, AFTER LEAVING LPL, UNBEKNOWNST TO ME LPL CHOSE TO USE "PERMISSION TO RESIGN" ON MY FORM U4. I LITERALLY ONLY FOUND OUT ABOUT THE "PERMISSION TO RESIGN" AFTER THE TRANSITION TO MY NEW BROKER DEALER.



End of Report

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