



IAPD Report

KEVIN MICHAEL MCDOUGALL

CRD# 1848761

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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

KEVIN MICHAEL MCDOUGALL (CRD# 1848761)

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 **01/29/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	THURSTON, SPRINGER, MILLER, HERD & TITAK, INC.	CRD# 8478	05/31/2019
IA	THURSTON SPRINGER ADVISORS	CRD# 299201	08/25/2020

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **7** 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	THURSTON SPRINGER FINANCIAL	8478	INDIANAPOLIS, IN	05/31/2019 - 07/06/2021
B	DAVID A. NOYES & COMPANY	205	INDIANAPOLIS, IN	11/06/2015 - 05/31/2019
IA	SANCTUARY ADVISORS, LLC	226606	INDIANAPOLIS, IN	11/06/2015 - 05/31/2019

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

Employment 1 of 2

Firm Name: **THURSTON, SPRINGER, MILLER, HERD & TITAK, INC.**
Main Address: 9000 KEYSTONE CROSSING
SUITE 700
INDIANAPOLIS, IN 46240-2142
Firm ID#: 8478

Regulator	Registration	Status	Date
B FINRA	General Securities Representative	Approved	05/31/2019
B Arizona	Agent	Approved	08/07/2024
B Florida	Agent	Approved	05/31/2019
B Indiana	Agent	Approved	05/31/2019
B Michigan	Agent	Approved	12/16/2024
B Montana	Agent	Approved	11/07/2023
B North Carolina	Agent	Approved	03/14/2024

Branch Office Locations

THURSTON SPRINGER FINANCIAL
9000 KEYSTONE CROSSING
SUITE 700
INDIANAPOLIS, IN 46240

Employment 2 of 2

Firm Name: **THURSTON SPRINGER ADVISORS**
Main Address: 9000 KEYSTONE CROSSING
SEVENTH FLOOR
INDIANAPOLIS, IN 46240
Firm ID#: 299201



Qualifications

Regulator	Registration	Status	Date
IA Florida	Investment Adviser Representative	Approved	11/30/2023
IA Indiana	Investment Adviser Representative	Approved	08/25/2020
IA Texas	Investment Adviser Representative	Restricted Approval	03/14/2022

Branch Office Locations

THURSTON SPRINGER ADVISORS
9000 KEYSTONE CROSSING
SEVENTH FLOOR
INDIANAPOLIS, IN 46240



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

Principal/Supervisory Exams

Exam	Category	Date
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No information reported.

General Industry/Product Exams

Exam	Category	Date
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Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
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General Securities Representative Examination (S7)	Series 7	06/30/2010
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State Securities Law Exams

Exam	Category	Date
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Uniform Combined State Law Examination (S66)	Series 66	07/30/2010
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PROFESSIONAL DESIGNATIONS

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

No information reported.



Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
IA	05/31/2019 - 07/06/2021	THURSTON SPRINGER FINANCIAL	CRD# 8478	INDIANAPOLIS, IN
B	11/06/2015 - 05/31/2019	DAVID A. NOYES & COMPANY	CRD# 205	INDIANAPOLIS, IN
IA	11/06/2015 - 05/31/2019	SANCTUARY ADVISORS, LLC	CRD# 226606	INDIANAPOLIS, IN
B	03/19/2013 - 11/13/2015	WELLS FARGO ADVISORS, LLC	CRD# 19616	INDIANAPOLIS, IN
IA	03/19/2013 - 11/13/2015	WELLS FARGO ADVISORS, LLC	CRD# 19616	INDIANAPOLIS, IN
B	09/27/2012 - 03/26/2013	AXA ADVISORS, LLC	CRD# 6627	INDIANAPOLIS, IN
IA	09/27/2012 - 03/26/2013	AXA ADVISORS, LLC	CRD# 6627	INDIANAPOLIS, IN
IA	08/27/2010 - 09/09/2011	MORGAN STANLEY SMITH BARNEY LLC	CRD# 149777	INDIANAPOLIS, IN
B	07/01/2010 - 09/09/2011	MORGAN STANLEY SMITH BARNEY	CRD# 149777	INDIANAPOLIS, IN

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
03/2013 - Present	WELLS FARGO ADVISORS	REGISTERED REP	Y	INDIANAPOLIS, IN, 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.

No information reported.



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
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Customer Dispute	1
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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 1

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	SANCTUARY SECURITIES, INC.
Allegations:	Breached the terms and conditions and its agreements with clients. Violates federal and state securities statutes. Violation of fiduciary duties. Is liable for the intentional and negligible misrepresentation of material facts.
Product Type:	Other: Privately traded REITs
Alleged Damages:	\$0.00
Alleged Damages Amount Explanation (if amount not exact):	Claim for an aggregate between \$100,000 and \$500,000
Is this an oral complaint?	No
Is this a written complaint?	No
Is this an arbitration/CFTC reparation or civil litigation?	Yes
Arbitration/Reparation forum or court name and location:	FINRA
Docket/Case #:	24-02250
Filing date of arbitration/CFTC reparation or civil litigation:	10/06/2024



Customer Complaint Information

Date Complaint Received: 02/28/2025
Complaint Pending? No
Status: Settled
Status Date: 10/07/2025
Settlement Amount: \$51,070.00
Individual Contribution Amount: \$0.00

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: SANCTUARY SECURITIES, INC.

Allegations: Breached the terms and conditions and its agreements with clients. Violates federal and state securities statutes. Violation of fiduciary duties. Is liable for the intentional and negligible misrepresentation of material facts.

Product Type: Other: Privately traded REITs

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): Claim for an aggregate between \$100,000 and \$500,000

Is this an oral complaint? No

Is this a written complaint? No

Is this an arbitration/CFTC reparation or civil litigation? Yes

Arbitration/Reparation forum or court name and location: FINRA

Docket/Case #: 24-02250

Filing date of arbitration/CFTC reparation or civil litigation: 10/06/2024

Customer Complaint Information

Date Complaint Received: 02/28/2025
Complaint Pending? No
Status: Settled
Status Date: 10/07/2025
Settlement Amount: \$51,070.00
Individual Contribution Amount: \$0.00

Broker Statement Mr. McDougall acted solely under the instructions and directives of the account Trustee who issued strict orders to construct the portfolio to generate yield in excess of what ordinary Equity/Debt income products could provide. Mr.



McDougall provided the Trustee with all warnings and precautions of undertaking such a strategy. The Trustee requested to attend meetings with issuers of alternative products so he could learn more about alternative investments paying higher than customary yields. The Trustee assumed a professional and fiduciary duty to the account, that Mr. McDougall was legally required to respect without contradiction. Mr. McDougall provided the requested service to the Trustee and was entitled and obligated to accept and execute the Trustee's instructions and orders. All disputes with the management of the account reside with the Trustee's professional discharge of his fiduciary duty.

The matter was settled by the firm with no input or consultation with McDougall. Further McDougall paid no part of the settlement. McDougall was eagerly anticipating the hearing to vigorously defend his claim. McDougall intends to seek expungement of this matter.



End of Report

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