



IAPD Report

JERRY ESKEL DEMPSEY JR

CRD# 1869325

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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

JERRY ESKEL DEMPSEY JR (CRD# 1869325)

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 **03/03/2026**.

CURRENT EMPLOYERS

| | Firm | CRD# | Registered Since |
|----|--|-------------|------------------|
| IA | CAMBRIDGE INVESTMENT RESEARCH ADVISORS, INC. | CRD# 134139 | 11/23/2025 |
| B | CAMBRIDGE INVESTMENT RESEARCH, INC. | CRD# 39543 | 11/24/2025 |
| IA | DEMPSEY LORD SMITH, LLC | CRD# 141238 | 01/20/2026 |

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **48** 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 | DEMPSEY LORD SMITH, LLC | 141238 | ROME, GA | 03/16/2007 - 02/23/2026 |
| IA | DEMPSEY LORD SMITH, LLC | 141238 | ROME, GA | 03/20/2007 - 12/31/2025 |
| B | RAYMOND JAMES FINANCIAL SERVICES, INC. | 6694 | ROME, GA | 06/14/1996 - 05/21/2007 |

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 |
|------------------|-------|
| Regulatory Event | 2 |



Report Summary

Customer Dispute 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 **48** jurisdiction(s) and 1 SRO(s) through his or her employer(s).

Employment 1 of 3

Firm Name: **CAMBRIDGE INVESTMENT RESEARCH, INC.**
Main Address: 1776 PLEASANT PLAIN RD.
FAIRFIELD, IA 52556-8757
Firm ID#: 39543

| | Regulator | Registration | Status | Date |
|----------|------------|--|----------|------------|
| B | FINRA | General Securities Principal | Approved | 11/24/2025 |
| B | FINRA | General Securities Representative | Approved | 11/24/2025 |
| B | FINRA | Introducing BD/Finan Operation Principal | Approved | 11/24/2025 |
| B | FINRA | Municipal Securities Principal | Approved | 11/24/2025 |
| B | FINRA | Municipal Securities Representative | Approved | 11/24/2025 |
| B | FINRA | Operations Professional | Approved | 11/24/2025 |
| B | FINRA | Registered Options Principal | Approved | 11/24/2025 |
| B | Alabama | Agent | Approved | 01/05/2026 |
| B | Alaska | Agent | Approved | 03/10/2026 |
| B | Arizona | Agent | Approved | 03/19/2026 |
| B | Arkansas | Agent | Approved | 03/30/2026 |
| B | California | Agent | Approved | 11/25/2025 |
| B | Colorado | Agent | Approved | 12/22/2025 |



Qualifications

| Regulator | Registration | Status | Date |
|-------------------------------|--------------|----------|------------|
| B Connecticut | Agent | Approved | 03/09/2026 |
| B Delaware | Agent | Approved | 03/03/2026 |
| B District of Columbia | Agent | Approved | 01/05/2026 |
| B Florida | Agent | Approved | 11/25/2025 |
| B Georgia | Agent | Approved | 11/26/2025 |
| B Idaho | Agent | Approved | 11/24/2025 |
| B Indiana | Agent | Approved | 01/22/2026 |
| B Iowa | Agent | Approved | 03/04/2026 |
| B Kansas | Agent | Approved | 03/03/2026 |
| B Kentucky | Agent | Approved | 01/07/2026 |
| B Louisiana | Agent | Approved | 03/03/2026 |
| B Maine | Agent | Approved | 03/24/2026 |
| B Maryland | Agent | Approved | 03/11/2026 |
| B Massachusetts | Agent | Approved | 03/05/2026 |
| B Michigan | Agent | Approved | 01/12/2026 |
| B Mississippi | Agent | Approved | 01/14/2026 |
| B Missouri | Agent | Approved | 04/02/2026 |
| B Nebraska | Agent | Approved | 01/06/2026 |
| B Nevada | Agent | Approved | 01/06/2026 |



Qualifications

| | Regulator | Registration | Status | Date |
|---|----------------|--------------|----------|------------|
| B | New Hampshire | Agent | Approved | 01/08/2026 |
| B | New Jersey | Agent | Approved | 12/11/2025 |
| B | New Mexico | Agent | Approved | 01/13/2026 |
| B | New York | Agent | Approved | 12/09/2025 |
| B | North Carolina | Agent | Approved | 01/09/2026 |
| B | North Dakota | Agent | Approved | 12/01/2025 |
| B | Ohio | Agent | Approved | 03/03/2026 |
| B | Oklahoma | Agent | Approved | 03/03/2026 |
| B | Oregon | Agent | Approved | 01/13/2026 |
| B | Pennsylvania | Agent | Approved | 03/04/2026 |
| B | Rhode Island | Agent | Approved | 03/04/2026 |
| B | South Carolina | Agent | Approved | 01/12/2026 |
| B | South Dakota | Agent | Approved | 01/08/2026 |
| B | Tennessee | Agent | Approved | 12/10/2025 |
| B | Texas | Agent | Approved | 12/01/2025 |
| B | Utah | Agent | Approved | 12/22/2025 |
| B | Vermont | Agent | Approved | 03/04/2026 |
| B | Virgin Islands | Agent | Approved | 03/04/2026 |
| B | Virginia | Agent | Approved | 03/11/2026 |



Qualifications

| Regulator | Registration | Status | Date |
|------------------------|--------------|----------|------------|
| B Washington | Agent | Approved | 01/06/2026 |
| B West Virginia | Agent | Approved | 01/23/2026 |
| B Wisconsin | Agent | Approved | 03/04/2026 |
| B Wyoming | Agent | Approved | 12/02/2025 |

Branch Office Locations

CAMBRIDGE INVESTMENT RESERARCH, INC.
 901 N BROAD STREET
 SUITE 400
 ROME, GA 30161

CAMBRIDGE INVESTMENT RESERARCH, INC.
 901 N Broad Street, Suite 400
 Rome, GA 30161

CAMBRIDGE INVESTMENT RESERARCH, INC.
 901 N Broad Street, Suite 400
 Rome, GA 30161

Employment 2 of 3

Firm Name: **CAMBRIDGE INVESTMENT RESEARCH ADVISORS, INC.**
 Main Address: 1776 PLEASANT PLAIN RD.
 FAIRFIELD, IA 52556-8757
 Firm ID#: 134139

| Regulator | Registration | Status | Date |
|--------------------------|-----------------------------------|---------------------|------------|
| IA Georgia | Investment Adviser Representative | Approved | 11/26/2025 |
| IA Texas | Investment Adviser Representative | Restricted Approval | 11/23/2025 |
| IA Virgin Islands | Investment Adviser Representative | Approved | 03/04/2026 |

Branch Office Locations

CAMBRIDGE INVESTMENT RESEARCH ADVISORS, INC.
 901 N Broad Street, Suite 400
 Rome, GA 30161

CAMBRIDGE INVESTMENT RESEARCH ADVISORS, INC.
 901 N Broad Street, Suite 400
 Rome, GA 30161

CAMBRIDGE INVESTMENT RESEARCH ADVISORS, INC.
 901 N Broad Street, Suite 400
 Rome, GA 30161



Qualifications

Employment 3 of 3

Firm Name: **DEMPSEY LORD SMITH, LLC**
Main Address: 901 N BROAD STREET
SUITE 400
ROME, GA 30161
Firm ID#: 141238

| Regulator | Registration | Status | Date |
|-------------------|-----------------------------------|----------|------------|
| IA Georgia | Investment Adviser Representative | Approved | 01/20/2026 |

Branch Office Locations

DEMPSEY LORD SMITH, LLC
901 N BROAD STREET
SUITE 400
ROME, GA 30161

DEMPSEY LORD SMITH, LLC
901 N. BROAD STREET - STE 400
ROME, GA 30161







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 4 principal/supervisory exams, 5 general industry/product exams, and 2 state securities law exams.



Principal/Supervisory Exams

| Exam | Category | Date |
|--|-----------|------------|
|  Registered Options Principal Examination (S4) | Series 4 | 12/12/2006 |
|  Introducing Broker/Dealer Financial Operations Principal Examination (S28) | Series 28 | 12/08/2006 |
|  Municipal Securities Principal Examination (S53) | Series 53 | 02/13/2004 |
|  General Securities Principal Examination (S24) | Series 24 | 10/11/2002 |

General Industry/Product Exams

| Exam | Category | Date |
|---|-------------|------------|
|  Municipal Securities Representative Examination (S52TO) | Series 52TO | 09/25/2025 |
|  Operations Professional Examination (S99TO) | Series 99TO | 01/02/2023 |
|  Securities Industry Essentials Examination (SIE) | SIE | 10/01/2018 |
|  General Securities Representative Examination (S7) | Series 7 | 06/13/1996 |
|  Non-Member General Securities Examination (S2) | Series 2 | 08/19/1994 |

State Securities Law Exams

| Exam | Category | Date |
|--|-----------|------------|
|  Uniform Securities Agent State Law Examination (S63) | Series 63 | 06/17/1996 |
|  Uniform Investment Adviser Law Examination (S65) | Series 65 | 07/13/1994 |



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 | 03/16/2007 - 02/23/2026 | DEMPSEY LORD SMITH, LLC | CRD# 141238 | ROME, GA |
| IA | 03/20/2007 - 12/31/2025 | DEMPSEY LORD SMITH, LLC | CRD# 141238 | ROME, GA |
| B | 06/14/1996 - 05/21/2007 | RAYMOND JAMES FINANCIAL SERVICES, INC. | CRD# 6694 | ROME, GA |
| B | 09/20/1988 - 04/05/1989 | THE STUART-JAMES COMPANY, INCORPORATED | CRD# 11691 | |

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 |
|-------------------|--|--|--------------------|------------------------------|
| 11/2025 - Present | Cambridge Investment Research Advisors, Inc. | IAR | Y | Fairfield, IA, United States |
| 11/2025 - Present | Cambridge Investment Research, Inc. | Registered Representative | Y | Fairfield, IA, United States |
| 03/2007 - Present | Dempsey Lord Smith, LLC | IAR | Y | Rome, GA, United States |
| 04/2006 - Present | DEMPSEY LORD SMITH, LLC | MANAGING PARTNER / CEO / CFO / CROP/SROP/FINOP | Y | ROME, GA, United States |
| 02/2006 - Present | DLS FINANCIAL, LLC | PARTNER | N | ROME, GA, United States |
| 06/1992 - Present | DEMPSEY FINANCIAL SERVICES, INC. | PROPRIETOR/OWNER | N | ROME, GA, United States |
| 03/1989 - Present | ROME TRUCK PARTS & REPAIR, INC. | VP, FINANCE AND ACCOUNTING | N | ROME, GA, United States |
| 07/2012 - 12/2024 | Silverleaf Insurance Company | Part Owner | Y | Rome, GA, 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. ROME TRUCK PARTS & REPAIR, INC, 241 Dempsey Road, Rome GA 30161, United States, 11/24/2025, Vice President, Accounting/Bookkeeping/Payroll Services, NIR, 4 HR/MO - 0 HR/MO TRADING
2. DLS FINANCIAL, LLC, 901 N Broad Street, Suite 400, Rome GA 30161, United States, START DATE 11/2025, Owner, Real Estate, NIR, 30 HR/MO, 2 HR/MO TRADING.
3. DEMPSEY FINANCIAL SERVICES, INC., 901 N Broad Street, Suite 400, Rome GA 30161, United States, START DATE 11/2025, President, Insurance/Benefits/Human Resources, IR, 15 HR/MO, 1 HR/MO TRADING.
4. ADVISORLYNX, LLC, 901 N Broad Street, Suite 400, Rome GA 30161, United States, 11/24/2025, President, Technology services, NIR, 20 HR/MO - 0 HR/MO TRADING



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 |
|------------------|-------|
| Regulatory Event | 2 |
| Customer Dispute | 2 |

Regulatory Event

This disclosure event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a federal regulator such as the Securities and Exchange Commission or the Commodities Futures Trading Commission, or a foreign financial regulatory body) for a violation of investment-related rules or regulations. This disclosure event may also include a revocation or suspension of an Investment Adviser Representative's authority to act as an attorney, accountant or federal contractor.

Disclosure 1 of 2

| | |
|---|---|
| Reporting Source: | Individual |
| Regulatory Action Initiated By: | GEORGIA INSURANCE DEPARTMENT |
| Sanction(s) Sought: | Civil and Administrative Penalty(ies)/Fine(s) |
| Date Initiated: | 05/29/2017 |
| Docket/Case Number: | 11018702 |
| Employing firm when activity occurred which led to the regulatory action: | DEMPSEY LORD SMITH, LLC |
| Product Type: | No Product |
| Allegations: | ALLEGED VIOLATION OF GEORGIA LAW O.C.G.A 33-23-21(2) AND 33-2-24(G)FOR FAILING TO TIMELY DISCLOSE TWO REGULATORY ACTIONS. THE MATTER WAS RESOLVED BY PAYING A CIVIL PENALTY OF \$300.00 |
| Current Status: | Final |
| Resolution: | Settled |
| Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? | No |
| Resolution Date: | 05/30/2017 |
| Sanctions Ordered: | Civil and Administrative Penalty(ies)/Fine(s) |

**Monetary Sanction 1 of 1****Monetary Related Sanction:** Civil and Administrative Penalty(ies)/Fine(s)**Total Amount:** \$300.00**Portion Levied against individual:** \$300.00**Payment Plan:****Is Payment Plan Current:****Date Paid by individual:****Was any portion of penalty waived?** No**Amount Waived:****Disclosure 2 of 2****Reporting Source:** Regulator**Regulatory Action Initiated By:** FINRA**Sanction(s) Sought:****Date Initiated:** 06/10/2015**Docket/Case Number:** [2014039284001](#)**Employing firm when activity occurred which led to the regulatory action:** DEMPSEY LORD SMITH, LLC**Product Type:** Other: PRIVATE PLACEMENT CONTINGENT OFFERINGS AND UNSPECIFIED BONDS**Allegations:** WITHOUT ADMITTING OR DENYING THE FINDINGS DEMPSEY CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT HIS MEMBER FIRM, ACTING THROUGH HIM, ITS CEO AND FINOP, FAILED TO SET UP ESCROW ACCOUNTS, PURSUANT TO THE REQUIREMENTS OF SECURITIES EXCHANGE ACT OF 1934 RULE 15C2-4, IN CONNECTION WITH THREE PRIVATE PLACEMENT CONTINGENT OFFERINGS, EVEN THOUGH THE FIRM PARTICIPATED IN EACH OF THE OFFERINGS AND ACCEPTED CUSTOMER FUNDS. INSTEAD, THE FIRM AND DEMPSEY ALLOWED INVESTOR FUNDS TO BE COMMINGLED IN ATTORNEY ESCROW ACCOUNTS ESTABLISHED BY THE ISSUERS. THE FINDINGS STATED THAT DEMPSEY FORWARDED SEVEN EMAILS TO PROSPECTIVE INVESTORS IN CONNECTION WITH SOLICITATIONS TO SELL BONDS ISSUED BY AN AFFILIATE OF THE FIRM. THE SEVEN EMAILS CONTAINED STATEMENTS THAT WERE UNFAIR AND UNBALANCED AND/OR WERE PROMISSORY.**Current Status:** Final**Resolution:** Acceptance, Waiver & Consent(AWC)



| | |
|---|--|
| Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? | No |
| Resolution Date: | 06/10/2015 |
| Sanctions Ordered: | Censure Civil and Administrative Penalty(ies)/Fine(s) |
| If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise? | No |
| (1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation? | |
| (2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or | |



(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$10,000.00

Portion Levied against individual: \$10,000.00

Payment Plan: \$5,000 OF THE \$10,000 FINE IS JOINT AND SEVERAL

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Reporting Source: Individual

Regulatory Action Initiated By: FINRA

Sanction(s) Sought: Censure
Civil and Administrative Penalty(ies)/Fine(s)

Date Initiated: 06/10/2015

Docket/Case Number: [2014039284001](#)

Employing firm when activity occurred which led to the regulatory action: DEMPSEY LORD SMITH, LLC

Product Type: Other: PRIVATE PLACEMENT CONTINGENT OFFERINGS AND UNSPECIFIED BONDS

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT THE FIRM, ACTING A PRINCIPAL, ITS CEO AND FINOP, FAILED TO SET UP ESCROW ACCOUNTS, PURSUANT TO THE REQUIREMENTS OF SECURITIES EXCHANGE ACT OF 1934 RULE 15C2-4, IN CONNECTION WITH THREE



PRIVATE PLACEMENT CONTINGENT OFFERINGS, EVEN THOUGH THE FIRM PARTICIPATED IN EACH OF THE OFFERINGS AND ACCEPTED CUSTOMER FUNDS. INSTEAD, THE FIRM AND THE PRINCIPAL ALLOWED INVESTOR FUNDS TO BE COMMINGLED IN ATTORNEY ESCROW ACCOUNTS ESTABLISHED BY THE ISSUERS. THE FINDINGS STATED THAT THE PRINCIPAL FORWARDED SEVEN EMAILS TO PROSPECTIVE INVESTORS IN CONNECTION WITH SOLICITATIONS TO SELL BONDS ISSUED BY AN AFFILIATE OF THE FIRM. THE SEVEN EMAILS CONTAINED STATEMENTS THAT WERE UNFAIR AND UNBALANCED AND/OR WERE PROMISSORY. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ENFORCE ITS WRITTEN SUPERVISORY PROCEDURES WHEN IT FAILED TO ENSURE THAT A PROPER ESCROW ACCOUNT WAS ESTABLISHED FOR EACH OF THE THREE CONTINGENT OFFERINGS IN CONTRAVENTION OF APPLICABLE SECURITIES LAWS AND REGULATIONS AND ITS WRITTEN SUPERVISORY PROCEDURES. ADDITIONALLY, THE FIRM FURTHER FAILED TO ENSURE THAT ALL COMMUNICATIONS BY ITS REPRESENTATIVES COMPLIED WITH FINRA'S ADVERTISING RULES.

Current Status: Final

Resolution: Acceptance, Waiver & Consent(AWC)

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Resolution Date: 06/10/2015

Sanctions Ordered: Censure
Civil and Administrative Penalty(ies)/Fine(s)

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$10,000.00

Portion Levied against individual: \$5,000.00

Payment Plan: CREDIT CARD

Is Payment Plan Current: Yes

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:



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: | DEMPSEY LORD SMITH, LLC |
| Allegations: | UNSUITABILITY, BREACH OF FIDUCIARY DUTY, AND NEGLIGENCE |
| Product Type: | Direct Investment-DPP & LP Interests |
| Alleged Damages: | \$0.00 |
| Alleged Damages Amount Explanation (if amount not exact): | unspecified compensatory damages; compensatory and punitive damages, Claimant respectfully requests pre-judgment interest, attorneys' fees and costs, filing and forum fees incurred herein, and for such other and further relief which the Panel deems just and proper under the circumstances. |

Arbitration Information

| | |
|---|--|
| Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): | FINRA |
| Docket/Case #: | 24-02182 |
| Date Notice/Process Served: | 10/17/2024 |
| Arbitration Pending? | No |
| Disposition: | Settled |
| Disposition Date: | 11/20/2025 |
| Monetary Compensation Amount: | \$310,000.00 |
| Individual Contribution Amount: | \$0.00 |
| Broker Statement | Jerry Dempsey, Jr. was not the client's registered representative at any time, and did not participate in the sales process for this investment. The client has made false statements in the statement of claim, and Mr. Dempsey is filing for expungement for this event. |

Disclosure 2 of 2

| | |
|--|--|
| Reporting Source: | Individual |
| Employing firm when activities occurred which led to the complaint: | DEMPSEY LORD SMITH, LLC |
| Allegations: | ON 11/27/2007 CUSTOMER ALLEGES REPRESENTATIVE MADE UNSUITABLE RECOMMENDATION, NON DISCLOSURE OF FEES, GUARANTEES, AND FREE LOOK VIOLATION. |



Product Type: Annuity-Variable
Alleged Damages: \$10,000.00
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: 04/25/2008
Complaint Pending? No
Status: Closed/No Action
Status Date: 02/20/2009
Settlement Amount:
Individual Contribution Amount:



End of Report

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