



## IAPD Report

# ROBERT JAMES D'ANDRIA

CRD# 1916172

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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

### ROBERT JAMES D'ANDRIA (CRD# 1916172)

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 **12/09/2025**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
<b>B</b>	INTERNATIONAL ASSETS ADVISORY, LLC	CRD# 10645	07/02/2010
<b>IA</b>	INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC	CRD# 144426	01/08/2016

### QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **9** 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>IA</b>	INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC	144426	SPRING LAKE, NJ	08/19/2010 - 12/31/2015
<b>IA</b>	WESTMINSTER FINANCIAL ADVISORY CORP	110283	BEAVERCREEK, OH	04/29/2010 - 08/02/2010
<b>B</b>	WESTMINSTER FINANCIAL SECURITIES, INC.	20677	EATONTOWN, NJ	03/29/2010 - 08/02/2010

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
Customer Dispute	5
Termination	1



## Report Summary



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

### Employment 1 of 2

Firm Name: **INTERNATIONAL ASSETS ADVISORY, LLC**  
Main Address: 111 N. ORANGE AVENUE  
SUITE 1000  
ORLANDO, FL 32801  
Firm ID#: 10645

Regulator	Registration	Status	Date
<b>B</b> FINRA	General Securities Representative	Approved	07/02/2010
<b>B</b> Florida	Agent	Approved	07/26/2010
<b>B</b> Maryland	Agent	Approved	08/03/2016
<b>B</b> Massachusetts	Agent	Approved	07/12/2010
<b>B</b> Minnesota	Agent	Approved	01/10/2017
<b>B</b> New Jersey	Agent	Approved	07/15/2010
<b>B</b> New York	Agent	Approved	07/02/2010
<b>B</b> Ohio	Agent	Approved	08/17/2016
<b>B</b> Pennsylvania	Agent	Approved	07/06/2010
<b>B</b> Texas	Agent	Approved	06/20/2017

### Branch Office Locations

**INTERNATIONAL ASSETS ADVISORY, LLC**  
309 MORRIS AVENUE, SUITE C  
SPRING LAKE, NJ 07762

### Employment 2 of 2



## Qualifications

Firm Name: **INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC**  
Main Address: 111 NORTH ORANGE AVENUE  
SUITE 1000  
ORLANDO, FL 32801  
Firm ID#: 144426

Regulator	Registration	Status	Date
<b>IA</b> New Jersey	Investment Adviser Representative	Approved	01/08/2016

### Branch Office Locations

**INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC**  
309 Morris Ave Suite C  
Spring Lake, NJ 07762



## 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 2 state securities law exams.**

#### 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	10/28/2003
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#### State Securities Law Exams

Exam	Category	Date
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Uniform Combined State Law Examination (S66)	Series 66	12/10/2003
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Uniform Securities Agent State Law Examination (S63)	Series 63	06/16/1989
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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	08/19/2010 - 12/31/2015	INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC	CRD# 144426	SPRING LAKE, NJ
IA	04/29/2010 - 08/02/2010	WESTMINSTER FINANCIAL ADVISORY CORP	CRD# 110283	BEAVERCREEK, OH
B	03/29/2010 - 08/02/2010	WESTMINSTER FINANCIAL SECURITIES, INC.	CRD# 20677	EATONTOWN, NJ
IA	01/13/2004 - 03/30/2010	GUNNALLEN FINANCIAL, INC	CRD# 17609	EATONTOWN, NJ
B	11/13/2003 - 03/30/2010	GUNNALLEN FINANCIAL, INC	CRD# 17609	EATONTOWN, NJ
B	04/30/2001 - 05/24/2001	JOHN HANCOCK FUNDS, INC.	CRD# 28262	BOSTON, MA
B	08/08/1995 - 02/25/2000	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	NEW YORK, NY
B	12/11/1990 - 06/29/1995	PAINWEBBER INCORPORATED	CRD# 8174	WEEHAWKEN, NJ
B	05/23/1989 - 11/01/1990	THE STUART-JAMES COMPANY, INCORPORATED	CRD# 11691	DENVER, CO

### 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
07/2010 - Present	INTERNATIONAL ASSETS ADVISORY LLC	REGISTERED REPRESENTATIVE	Y	SPRING LAKE, NJ, United States
07/2010 - Present	INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC	INVESTMENT ADVISOR REPRESENTATIVE	Y	SPRING LAKE, NJ, 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) STERLINGNOBLE WEALTH MANAGEMENT 309 MORRIS AVE. SUITE C SPRING LAKE NJ 07762 - DBA FOR IAA BUSINESS - PRESIDENT/100% OWNER SINCE 04/2010 - APPROX 160 HRS/MO - COMMISSION BASED COMPENSATION
- 2) INTERNATIONAL ASSETS INVESTMENT MANAGEMENT LLC - 111 N ORANGE AVE, STE 1000, ORLANDO, FL 32801 - ORLANDO, FL 32801 - RIA AFFILIATE OF INTERNATIONAL ASSETS ADVISORS - ADVISOR SINCE 8/2010 - APPROX 80 HRS/MO - FEE BASED COMPENSATION
- 3) ADP, LLC ONE ADP BLVD, ROSELAND, NJ 07068 - PAYROLL SERVICES COMPANY - REFFERRAL AGENT SINCE 9/2016 - APPROX 1 HR/MO - REFFERRAL FEES



## 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	5
Termination	1

### 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:** Regulator

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:**

**Date Initiated:** 01/03/2020

**Docket/Case Number:** [2017056579502](#)

**Employing firm when activity occurred which led to the regulatory action:** International Assets Advisory, LLC

**Product Type:** Other: non-traditional exchange traded products

**Allegations:** Without admitting or denying the findings, D' Andria consented to the sanctions and to the entry of findings that he recommended the purchase of non-traditional exchange traded products (NT-ETPs) to customers' without having a sufficient understanding of the risks and features associated with these NT-ETPs and thereby failing to have a reasonable basis to make these recommendations. The findings stated that D' Andria failed to perform a reasonable basis suitability analysis of NT-ETPs to understand the unique features and specific risks associated with these products before offering them to his customers. In fact, the prospectuses for the NT-ETPs that D'Andria recommended warned that the products were risky, intended to be daily trading tools for sophisticated investors, and should be actively and frequently monitored, even intra-day. Moreover, D' Andria did not understand that losses in NT-ETPs are compounded because of how the valuations reset each day. The findings also stated that the customers held these positions for periods ranging from 30 to 758 days. The average holding



period was 327 days. These extended holding periods caused D' Andria's customers to incur approximately \$93,000 in losses. D' Andria's member firm consented to supervision charges in relation to his unsuitable recommendations of NT-ETPs and agreed to a fine and order of restitution to be paid to the affected customers.

**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:** 01/03/2020

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

**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?**

**Sanction 1 of 1**

<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	All Capacities
<b>Duration:</b>	two months
<b>Start Date:</b>	02/03/2020
<b>End Date:</b>	04/02/2020

**Monetary Sanction 1 of 1**

<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$5,000.00
<b>Portion Levied against individual:</b>	\$5,000.00
<b>Payment Plan:</b>	
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	02/05/2020
<b>Was any portion of penalty waived?</b>	No

**Amount Waived:**  
.....

**Reporting Source:** Individual  
**Regulatory Action Initiated By:** FINRA  
**Sanction(s) Sought:**  
**Date Initiated:** 01/03/2020  
**Docket/Case Number:** [2017056579502](#)  
**Employing firm when activity occurred which led to the regulatory action:** INTERNATIONAL ASSETS ADVISORY, LLC

**Product Type:** Other: NON-TRADITIONAL EXCHANGE TRADED PRODUCTS

**Allegations:** Without admitting or denying the findings, D' Andria consented to the sanctions and to the entry of findings that he recommended the purchase of non-traditional exchange traded products (NT-ETPs) to customers' without having a sufficient understanding of the risks and features associated with these NT-ETPs and thereby failing to have a reasonable basis to make these recommendations. The findings stated that D' Andria failed to perform a reasonable basis suitability analysis of NT-ETPs to understand the unique features and specific risks associated with these products before offering them to his customers. In fact, the prospectuses for the NT-ETPs that D'Andria recommended warned that the products were risky, intended to be daily trading tools for sophisticated investors, and should be actively and frequently monitored, even intra-day. Moreover, D' Andria did not understand that losses in NT-ETPs are compounded because of how the valuations reset each day. The findings also stated that the customers held these positions for periods ranging from 30 to 758 days. The average holding period was 327 days. These extended holding periods caused D' Andria's customers to incur approximately \$93,000 in losses. D' Andria's member firm consented to supervision charges in relation to his unsuitable recommendations of NT-ETPs and agreed to a fine and order of restitution to be paid to the affected customers.

**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:** 01/03/2020  
**Sanctions Ordered:** Civil and Administrative Penalty(ies)/Fine(s)  
Suspension

**Sanction 1 of 1**

**Sanction Type:** Suspension  
**Capacities Affected:** ALL CAPACITIES  
**Duration:** TWO MONTHS  
**Start Date:** 02/03/2020



**End Date:** 04/02/2020

**Monetary Sanction 1 of 1**

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

**Total Amount:** \$5,000.00

**Portion Levied against individual:** \$5,000.00

**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:** NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

**Sanction(s) Sought:**

**Date Initiated:** 04/29/2003

**Docket/Case Number:** C9B030023

**Employing firm when activity occurred which led to the regulatory action:** (1)AETNA INVESTMENT SERVICES, LLC (2)JOHN HANCOCK FUNDS, LLC

**Product Type:** No Product

**Allegations:** NASD CONDUCT RULE IM-1000-1 AND 2110 - RESPONDENT FAILED TO DISCLOSE MATERIAL FACTS ON HIS FORM U4.

**Current Status:** Final

**Resolution:** Acceptance, Waiver & Consent(AWC)

**Resolution Date:** 04/29/2003

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

**Regulator Statement** WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, THE RESPONDENT ROBERT D'ANDRIA CONSENTED TO THE FINDING OF THE ALLEGATIONS AND TO THE FOLLOWING SANCTIONS: FINED \$5,000 AND SUSPENDED FOR 10 DAYS FROM ASSOCIATION WITH ANY NASD MEMBER IN ANY CAPACITY. THE FINE SHALL BE DUE AND PAYABLE EITHER PRIOR TO REASSOCIATION WITH A MEMBER FIRM FOLLOWING THE SUSPENSION OR PRIOR TO ANY APPLICATION OR REQUEST FOR RELIEF FROM ANY STATUTORY DISQUALIFICATION RESULTING FROM THIS OR ANY OTHER EVENT OR PROCEEDING, WHICHEVER IS EARLIER. THE SUSPENSION WILL COMMENCE WITH THE OPENING OF BUSINESS ON JUNE 2, 2003, AND WILL CONCLUDE AT THE CLOSE OF BUSINESS ON JUNE 11, 2003. FINES PAID 11/04/2003.



**Reporting Source:** Individual

**Regulatory Action Initiated By:** NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

**Sanction(s) Sought:** Suspension

**Other Sanction(s) Sought:** \$5000.00 FINE AND 10 DAY SUSPENSION

**Date Initiated:** 04/29/2003

**Docket/Case Number:** C9B030023

**Employing firm when activity occurred which led to the regulatory action:** (1) AETNA INVESTMENT SERVICES,LLC (2) JOHN HANCOCK FUNDS, LLC

**Product Type:** No Product

**Other Product Type(s):**

**Allegations:** NASD CONDUCT RULE IM-1000 AND 2110- RESPONDENT FAILED TO DISCLOSE MATERIAL FACTS ON HIS FORM U4.

**Current Status:** Final

**Resolution:** Acceptance, Waiver & Consent(AWC)

**Resolution Date:** 04/29/2003

**Sanctions Ordered:** Monetary/Fine \$5,000.00

**Other Sanctions Ordered:** SUSPENDED FOR 10 DAYS FROM ASSOCIATION WITH ANY NASD MEMBER IN ANY CAPACITY

**Sanction Details:** FINED \$5000.00 AND SUSPENDED FOR 10 DAYS FROM ASSOCIATION WITH ANY NASD MEMBER IN ANY CAPACITY. THE FINE SHALL BE DUE AND PAYABLE EITHER PRIOR TO REASSOCIATION WITH A MEMBER FIRM FOLLOWING THE SUSPENSION OR PRIOR TO ANY APPLICATION OR REQUEST FOR RELIEF FROM ANY STATUTORY DISQUALIFICATION RESULTING FROM THIS OR ANY OTHER EVENT OR PROCEEDING, WHICHEVER IS EARLIER.THE SUSPENSION WILL COMMENCE WITH THE OPENING OF BUSINESS ON JUNE 2, 2003, AND WILL CONCLUDE AT THE CLOSE OF BUSINESS ON JUNE 11,2003.



## 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 5

<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	INTERNATIONAL ASSETS ADVISORY, LLC
<b>Allegations:</b>	UNSUITABILITY, UNAUTHORIZED TRADING, FRAUD, BREACH OF CONTRACT, NEGLIGENT SUPERVISION, BREACH OF FIDUCIARY DUTY
<b>Product Type:</b>	Other: NON TRADITIONAL EXCHANGE TRADED PRODUCTS
<b>Alleged Damages:</b>	\$5,000.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	CLAIMANT SEEKS UNSPECIFIED DAMAGES BELIEVED TO BE GREATER THAN \$5000.
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	No
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	Yes
<b>Arbitration/Reparation forum or court name and location:</b>	FINRA
<b>Docket/Case #:</b>	20-03043
<b>Filing date of arbitration/CFTC reparation or civil litigation:</b>	09/08/2020

### Customer Complaint Information

<b>Date Complaint Received:</b>	09/14/2020
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	10/28/2021
<b>Settlement Amount:</b>	\$45,000.00
<b>Individual Contribution Amount:</b>	\$0.00

### Disclosure 2 of 5

<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	INTERNATIONAL ASSETS ADVISORY, LLC



**Allegations:** MISMANAGEMENT OF ACCOUNT

**Product Type:** Debt-Corporate  
Equity Listed (Common & Preferred Stock)

**Alleged Damages:** \$130,000.00

**Alleged Damages Amount Explanation (if amount not exact):** APPROXIMATE AMOUNT

**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:** 04/09/2020

**Complaint Pending?** No

**Status:** Denied

**Status Date:** 05/08/2020

**Settlement Amount:**

**Individual Contribution Amount:**

### Disclosure 3 of 5

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** MERRILL LYNCH, PIERCE, FENNER & SMITH INC.

**Allegations:** CUSTOMERS ALLEGE FINANCIAL CONSULTANT MISREPRESENTED FACTS ABOUT DEBIT STRATEGIES FUND. CUSTOMERS FURTHER ALLEGE THAT FINANCIAL CONSULTANT MADE AN UNAUTHORIZED PURCHASE OF ZERO COUPON BONDS. CLAIMANTS FURTHER ALLEGE "INAPPROPRIATE USE OF MARGIN."

**Product Type:** Mutual Fund(s)

**Other Product Type(s):** DEBT-MUNICIPAL

**Alleged Damages:** \$97,856.00

### Customer Complaint Information

**Date Complaint Received:** 08/08/2000

**Complaint Pending?** No

**Status:** Arbitration/Reparation

**Status Date:** 03/30/2001

**Settlement Amount:**

**Individual Contribution Amount:**

### Arbitration Information



**Arbitration/Reparation Claim filed with and Docket/Case No.:** NASD 01-07204

**Date Notice/Process Served:** 03/30/2001

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 03/26/2003

**Monetary Compensation Amount:** \$30,000.00

**Individual Contribution Amount:** \$0.00

**Firm Statement** SETTLED.

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**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** MERRILL LYNCH

**Allegations:** CUSTOMER ALLEGES MISREPRESENTATION OF A MUTUAL FUND INVESTMENT TO THEM. CUSTOMER FURTHER ALLEGE UNAUTHORIZED PURCHASE IN ONE OF THEIR ACCOUNTS AND USE OF MARGIN WITHOUT AUTORIZATION.

**Product Type:** Mutual Fund(s)

**Other Product Type(s):** DEBT/MUNICIPAL

**Alleged Damages:** \$97,856.00

### Customer Complaint Information

**Date Complaint Received:** 08/08/2000

**Complaint Pending?** No

**Status:** Arbitration/Reparation

**Status Date:** 03/30/2001

**Settlement Amount:**

**Individual Contribution Amount:**

### Arbitration Information

**Arbitration/Reparation Claim filed with and Docket/Case No.:** NASD 01-07204

**Date Notice/Process Served:** 03/30/2001

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 03/26/2003

**Monetary Compensation Amount:** \$30,000.00



**Individual Contribution Amount:** \$0.00

**Broker Statement** THIS TRANSACTION WAS IN THE CLIENT'S ACCOUNT 3 WEEKS BEFORE A COMPLAINT WAS FILED. THE SECURITY DECREASED IN VALUE AND THE ACCUSATION WAS MADE.

#### Disclosure 4 of 5

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** MERRILL LYNCH, PIERCE, FENNER & SMITH INC.

**Allegations:** CUSTOMER ALLEGED THAT MR. D'ANDRIA BOUGHT KNIGHT/TRIMARK CALL OPTIONS IN AUGUST 1999 WITHOUT HIS AUTHORIZATION. IN ADDITION, CUSTOMER ALLEGED THAT THE PURCHASES OF 200 SHARES OF E TRADE GROUP COMMON STOCK ON MAY 6, 1999, AND 100 SHARES OF QUALCOM ON JANUARY 4, 2000 WERE UNAUTHORIZED. CUSTOMER CLAIMED DAMAGES OF \$6,250.

**Product Type:** Options

**Other Product Type(s):** EQUITY-OTC

**Alleged Damages:** \$6,250.00

#### Customer Complaint Information

**Date Complaint Received:** 05/12/2000

**Complaint Pending?** No

**Status:** Denied

**Status Date:** 05/19/2000

**Settlement Amount:**

**Individual Contribution Amount:**

**Firm Statement** MERRILL LYNCH FOUND CUSTOMER'S CLAIMS FOUR MONTHS TO A YEAR AFTER THE TRADES IN QUESTION TO BE WITHOUT MERIT.

.....

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** MERRILL, LYNCH, PIERCE, FENNER AND SMITH INC.

**Allegations:** AFTER MONTHS THE CUSTOMER ALLEGED I PURCHASED CALL OPTIONS, 200 SHARES OF E-TRADE STOCK AND 100 SHARES OF QUALCOMM STOCK WITHOUT AUTHORIZATION.

**Product Type:** Options

**Other Product Type(s):** STOCK

**Alleged Damages:** \$6,250.00

#### Customer Complaint Information

**Date Complaint Received:** 05/12/2000



**Complaint Pending?** No  
**Status:** Closed/No Action  
**Status Date:** 05/19/2000  
**Settlement Amount:** \$0.00  
**Individual Contribution Amount:** \$0.00  
**Broker Statement** MERRILL DETERMINED CLAIMS WERE WITHOUT MERIT.

#### Disclosure 5 of 5

**Reporting Source:** Firm  
**Employing firm when activities occurred which led to the complaint:** MERRILL LYNCH, PIERCE, FENNER & SMITH INC.  
**Allegations:** [CUSTOMERS] VERBALLY ALLEGED THAT MR. D'ANDRIA PURCHASED 2000 SHARES OF ASHFORD.COM COMMON STOCK ON NOVEMBER 30, 1999 WITHOUT THEIR AUTHORIZATION. NO SPECIFIC DAMAGES WERE CLAIMED.  
**Product Type:** Equity - OTC  
**Alleged Damages:** \$0.00

#### Customer Complaint Information

**Date Complaint Received:** 01/31/2000  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:** 02/07/2000  
**Settlement Amount:** \$41,363.17  
**Individual Contribution Amount:** \$0.00  
**Firm Statement** MERRILL LYNCH MADE A BUSINESS DECISION TO CORRECT THE PURCHASE OF ASHFORD.COM COMMON STOCK TO AVOID THE COSTS AND UNCERTAINTIES OF LITIGATION.

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**Reporting Source:** Individual  
**Employing firm when activities occurred which led to the complaint:** MERRILL, LYNCH, PIERCE, FENNER AND SMITH INC.  
**Allegations:** [CUSTOMER] VERBALLY ALLEGED I PURCHASED 2000 SHARES OF ASHFORD.COM STOCK ON 11/30/99 WITHOUT AUTHORIZATION (TWO MONTHS AFTER TRADE).  
**Product Type:** Equity Listed (Common & Preferred Stock)  
**Alleged Damages:** \$0.00

#### Customer Complaint Information

**Date Complaint Received:** 01/31/2000



<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	02/07/2000
<b>Settlement Amount:</b>	\$41,363.17
<b>Individual Contribution Amount:</b>	\$0.00
<b>Broker Statement</b>	MERRILL LYNCH MADE A BUSINESS DECISION TO CORRECT THE PURCHASE OF ASHFORD.COM TO AVOID COSTS AND UNCERTAINTY OF LITIGATION.



## 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

<b>Reporting Source:</b>	Individual
<b>Firm Name:</b>	MERRILL LYNCH
<b>Termination Type:</b>	Discharged
<b>Termination Date:</b>	01/27/2001
<b>Allegations:</b>	TERMINATED FOR VIOLATING MERRILL LYNCH POLICY AFTER CLIENT AUTHORIZED DOCUMENT TO BE INITIALED TO TRANSFER FUNDS FROM HER SINGLE ACCOUNT TO HER JOINT ACCOUNT FOR A REAL ESTATE CLOSING. AGAINST MY BETTER JUDGEMENT I AIDED THE CLIENT IN HER REQUEST AND IT COST ME MY CAREER AT MERRILL LYNCH.
<b>Product Type:</b>	Other
<b>Other Product Types:</b>	NOT A PRODUCT TYPE
<b>Broker Statement</b>	TERMINATED FOR VIOLATING MERRILL LYNCH POLICY AFTER CLIENT AUTHORIZED DOCUMENT TO BE INITIALED TO TRANSFER FUNDS FROM HER SINGLE ACCOUNT TO HER JOINT ACCOUNT FOR A REAL ESTATE CLOSING. AGAINST MY BETTER JUDGEMENT I AIDED THE CLIENT IN HER REQUEST AND IT COST ME MY CAREER AT MERRILL LYNCH. - THE TRANSACTION WAS NEVER RECORDED.



## End of Report

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