



IAPD Report

JOEL MARK JOHNSON

CRD# 1941908

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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

JOEL MARK JOHNSON (CRD# 1941908)

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 **09/11/2024**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	JOHNSON BRUNETTI	CRD# 171168	06/12/2014

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **3** 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	SILVER OAK SECURITIES, INCORPORATED	46947	WETHERSFIELD, CT	01/22/2007 - 04/20/2017
IA	SILVER OAK SECURITIES, INC.	46947	WETHERSFIELD, CT	11/08/2007 - 06/12/2014
IA	ING FINANCIAL PARTNERS, INC	2882	WETHERSFIELD, CT	06/16/2006 - 11/14/2006

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	1
Customer Dispute	6
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 **3** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **JOHNSON BRUNETTI**
Main Address: 100 GREAT MEADOW ROAD
SUITE 502
WETHERSFIELD, CT 06109
Firm ID#: 171168

	Regulator	Registration	Status	Date
IA	Connecticut	Investment Adviser Representative	Approved	06/12/2014
IA	Georgia	Investment Adviser Representative	Approved	10/15/2021
IA	Massachusetts	Investment Adviser Representative	Approved	03/21/2018

Branch Office Locations

JOHNSON BRUNETTI
100 GREAT MEADOW ROAD
SUITE 502
WETHERSFIELD, CT 06109



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, 3 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	04/20/2017
	General Securities Representative Examination (S7)	Series 7	02/27/2006
	Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	11/17/1993

State Securities Law Exams

Exam	Category	Date
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	Uniform Investment Adviser Law Examination (S65)	Series 65	01/07/2004
	Uniform Securities Agent State Law Examination (S63)	Series 63	11/13/1996

PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **1** professional designation(s).

Certified Financial Planner

This representative holds or did hold **1** professional designation(s) that may have been used to qualify as an Investment Advisor representative. Please check with the appropriate designation authority for verification that the designation is still in effect. The contact information for these professional designation authorities can be found on the website for the North American Securities Administrators Association at <http://www.nasaa.org>



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	01/22/2007 - 04/20/2017	SILVER OAK SECURITIES, INCORPORATED	CRD# 46947	WETHERSFIELD, CT
IA	11/08/2007 - 06/12/2014	SILVER OAK SECURITIES, INC.	CRD# 46947	WETHERSFIELD, CT
IA	06/16/2006 - 11/14/2006	ING FINANCIAL PARTNERS, INC	CRD# 2882	WETHERSFIELD, CT
B	05/09/2006 - 11/14/2006	ING FINANCIAL PARTNERS, INC.	CRD# 2882	WETHERSFIELD, CT
B	05/31/2005 - 05/31/2006	USALLIANZ SECURITIES, INC.	CRD# 40875	MINNEAPOLIS, MN
IA	05/31/2005 - 05/31/2006	USALLIANZ SECURITIES, INC.	CRD# 40875	WETHERSFIELD, CT
IA	01/26/2004 - 06/03/2005	METLIFE SECURITIES INC.	CRD# 14251	WETHERSFIELD, CT
B	10/01/2003 - 06/03/2005	METLIFE SECURITIES INC.	CRD# 14251	SPRINGFIELD, MA
B	10/01/2003 - 06/03/2005	METROPOLITAN LIFE INSURANCE COMPANY	CRD# 4095	NEW YORK, NY
B	03/27/1997 - 04/08/2003	NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC	CRD# 2881	MILWAUKEE, WI
B	03/27/1997 - 01/01/2002	ROBERT W. BAIRD & CO. INCORPORATED	CRD# 8158	MILWAUKEE, WI
B	11/18/1993 - 03/17/1997	AAL CAPITAL MANAGEMENT CORPORATION	CRD# 18387	MINNEAPOLIS, MN
B	01/09/1991 - 04/08/1991	FIRST MONTAUK SECURITIES CORP.	CRD# 13755	RED BANK, NJ
B	11/27/1990 - 01/23/1991	CHATFIELD DEAN & CO., INC.	CRD# 14714	GREENWOOD VILLAGE
B	04/18/1989 - 12/03/1990	THE STUART-JAMES COMPANY, INCORPORATED	CRD# 11691	DENVER, CO



Registration & Employment History

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
01/2018 - Present	JN Financial LLC	Insurance Agent	Y	Wethersfield, CT, United States
04/2014 - Present	JB CAPITAL LLC	INVESTMENT ADVISER REPRESENTATIVE	Y	WETHERSFIELD, CT, United States
10/2005 - Present	FINANCIAL RETIREMENT SOLUTIONS LLC	OWNER/MANAGING MEMBER	Y	WETHERSFIELD, CT, United States
11/2005 - 12/2017	Financial Retirement Solutions LLC (dba "Johnson Brunetti")	Insurance Agent	Y	Wethersfield, CT, United States
12/2006 - 04/2017	SILVER OAK SECURITIES INCORPORATED	REGISTERED REPRESENTATIVE	Y	WETHERSFIELD, CT, 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.

J.N. FINANCIAL LLC STARTED 01/2006 100 GREAT MEADOW ROAD STE 502 WETHERSFIELD, CT 06109. FULL TIME. 80 HOURS PER WEEK. OWNER OPERATOR. SALARY. COMMISSION AND PROFITS. INSURANCE SERVICES. LIFE, HEALTH AND FIXED. 100 GREAT MEADOW RD. #502. WETHERSFIELD, CT;

Joel Johnson has an ownership interest in EQIS Holdings, a third party money manager and SEC registered investment advisor, his ownership interest totals less than approximately 1% ownership, EQIS Capital Management, 1000 4th Street, Ste. 650, San Rafael, CA 94901, no hours spent on this business, duties include shareholder.

JOHNSON BRUNETTI TAX SERVICE. STARTED 01/2010 - Inactive - 0 HOURS PER MONTH. NOT INVESTMENT RELATED. TAX PREP AND ADVICE. TAX SERVICES. PAID FROM PART OF PROFITS. 100 GREAT MEADOW ROAD STE 502 WETHERSFIELD, CT 06080

AUTHOR OF BOOKS AND ARTICLES. PART TIME. POLITICAL AND FINANCIAL TOPICS. ROYALTIES 20% OF ALL BOOK SALES. 100 GREAT MEADOW ROAD STE 502 WETHERSFIELD, CT 06080 STARTED 01/2011.

Rainmaker Consulting,LLC; 100 GREAT MEADOW ROAD, SUITE 502, WETHERSFIELD, CT 06109. NON-INVESTMENT RELATED. TEACHING/COACHING/TRAINING. OWNER. 40 HOURS / MONTH. 10+ DURING SECURITIES TRADING HOURS.

Mr. Joel Mark Johnson is a Member/Investor of Cox Point Plantation Investors, LLC/Real Estate/Commercial Property, Located at 2203 Willow Ave., Atlanta, GA 30305. Start date 12/1/15.Non investment related activity.0 hours spent during trading hours.

Mr.Joel Mark Johnson is a member of River West SC, LLC. This is non investment related real estate (raw land) investment located in River West, Ethos, Orlando starting November 30, 2016. No hours devoted to this business during business or trading hours. Duties are passive i.e. only as investor.

Joel Johnson is on the board of directors for Connecticut Community for Addiction Recovery. He receives no compensation and spends about 8 to 10 hours a year on this activity.



Registration & Employment History



OTHER BUSINESS ACTIVITIES

FINANCIAL RETIREMENT SOLUTIONS LLC; 100 GREAT MEADOW ROAD, SUITE 502, Wethersfield, CT 06109. INVESTMENT RELATED. FULL SERVICE FINANCIAL PLANNING FIRM. OWNER - MANAGING MEMBER. 160 HOURS / MONTH. 100 HOURS DEVOTED DURING SECURITIES TRADING HOURS. MARKETING / INVESTMENT DECISIONS / LEADERSHIP.



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	1
Customer Dispute	6
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 1

Reporting Source:	Firm
Regulatory Action Initiated By:	STATE OF CONNECTICUT INSURANCE DEPARTMENT
Sanction(s) Sought:	Revocation
Date Initiated:	09/21/2006
Docket/Case Number:	MC-06-89
Employing firm when activity occurred which led to the regulatory action:	USALLIANZ SECURITIES, INC.
Product Type:	Insurance
Allegations:	STATE OF CONNECTICUT DEPARTMENT OF INSURANCE (DEPARTMENT) ISSUED A COMPLAINT ALLEGING RESPONDENT VIOLATED CONNECTICUT GENERAL STATUTES. THE ALLEGATIONS STEM FROM, COUNT 1 - RESPONDENT SUBMITTING COMPLETED ANNUITY APPLICATIONS TO AN INSURANCE COMPANY THAT RESPONDENT KNEW OR SHOULD HAVE KNOWN HELD NO CERTIFICATE THEN IN FORCE FROM THE CONNECTICUT INSURANCE COMMISSIONER AUTHORIZING THEM TO DO INSURANCE BUSINESS IN CONNECTICUT; FURTHER, RESPONDENT MADE A FALSE STATEMENT/REPRESENTATION BY SHOWING THESE APPLICATIONS WERE SIGNED IN MASSACHUSETTS, WHEN THEY WERE IN FACT SIGNED IN CONNECTICUT. COUNT 2 - RESPONDENT CONDUCTED INSURANCE BUSINESS UNDER THE NAME FINANCIAL RETIREMENT SOLUTIONS, LLC, AN ORGANIZATION NOT LICENSED BY THE DEPARTMENT. COUNT 3 - RESPONDENT CONDUCTED BUSINESS UNDER THE NAME JOHNSON



Current Status: ASSOCIATES, AN ORGANIZATION NOT LICENSED BY THE DEPARTMENT.
Final
Resolution: Consent
Resolution Date: 11/16/2006
Sanctions Ordered: Other: Representative consented to revocation without finding of fact.

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Reporting Source: Individual
Regulatory Action Initiated By: STATE OF CONNECTICUT INSURANCE DEPARTMENT
Sanction(s) Sought: Revocation
Date Initiated: 06/26/2006
Docket/Case Number: MC 06-89

Employing firm when activity occurred which led to the regulatory action: USALLIANZ SECURITIES, INC.

Product Type: Insurance

Allegations: STATE OF CONNECTICUT DEPARTMENT OF INSURANCE (DEPARTMENT) ISSUED A COMPLAINT ALLEGING RESPONDENT VIOLATED CONNECTICUT GENERAL STATUTES. THE ALLEGATIONS STEM FROM, COUNT 1 - RESPONDENT SUBMITTING COMPLETED ANNUITY APPLICATIONS TO AN INSURANCE COMPANY THAT RESPONDENT KNEW OR SHOULD HAVE KNOWN HELD NO CERTIFICATE THEN IN FORCE FROM THE CONNECTICUT INSURANCE COMMISSIONER AUTHORIZING THEM TO DO INSURANCE BUSINESS IN CONNECTICUT; FURTHER, RESPONDENT MADE A FALSE STATEMENT/REPRESENTATION BY SHOWING THESE APPLICATIONS WERE SIGNED IN MASSACHUSETTS, WHEN THEY WERE IN FACT SIGNED IN CONNECTICUT. COUNT 2 - RESPONDENT CONDUCTED INSURANCE BUSINESS UNDER THE NAME FINANCIAL RETIREMENT SOLUTIONS, LLC, AN ORGANIZATION NOT LICENSED BY THE DEPARTMENT. COUNT 3 - RESPONDENT CONDUCTED BUSINESS UNDER THE NAME JOHNSON ASSOCIATES, AN ORGANIZATION NOT LICENSED BY THE DEPARTMENT.

Current Status: Final
Resolution: Consent
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: 11/16/2006
Sanctions Ordered: Other: CONSENTED TO A REVOCATIN WITHOUT FINDING OF FACT.

Broker Statement I,IN THE COURSE OF NORMAL INSURANCE SALES BUSINESS IN CONNETICUT AND MASSACHUSETS SOLD INSURANCE TO CONNETICUT RESIDENTS. THE INSURANCE PRODUCT WAS WRITTEN WITH A COMPANY THAT WAS APPROVED IN MASSACHUTS BUT NOT IN CONNECTICUT.
UPDATED 4/8/09: MR. JOHNSON'S INSURANCE LICENSE HAS BEEN



REINSTATED AS OF FEBRUARY 16, 2009



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 6

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	SILVER OAK SECURITIES, INCORPORATED
Allegations:	Claimant states, "The nature of the investment products, the concentration issue, the unsuitability, heightened supervision required, and the risks associated with the illiquidity, lack of transparency, and high-commission product - disguised and misrepresented as a suitable investment strategy - were all on Respondent and FA Johnson. But for their recommendations and negligent misrepresentations and omissions of material facts, Claimant would not have incurred the unnecessary losses and damages in this case."
Product Type:	Real Estate Security
Alleged Damages:	\$5,000.00
Alleged Damages Amount Explanation (if amount not exact):	Firm unable to make good faith determination alleged damages would be less than \$5,000
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 #:	23-03157
Filing date of arbitration/CFTC reparation or civil litigation:	10/27/2023

Customer Complaint Information

Date Complaint Received:	11/02/2023
Complaint Pending?	No
Status:	Settled
Status Date:	01/29/2024
Settlement Amount:	\$22,500.00
Individual Contribution Amount:	\$0.00

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Reporting Source:	Individual
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Employing firm when activities occurred which led to the complaint:

SILVER OAK SECURITIES, INCORPORATED

Allegations:

Claimant states, "The nature of the investment products, the concentration issue, the unsuitability, heightened supervision required, and the risks associated with the illiquidity, lack of transparency, and high-commission product - disguised and misrepresented as a suitable investment strategy - were all on Respondent and FA Johnson. But for their recommendations and negligent misrepresentations and omissions of material facts, Claimant would not have incurred the unnecessary losses and damages in this case."

Product Type:

Real Estate Security

Alleged Damages:

\$5,000.00

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 #:

23-03157

Filing date of arbitration/CFTC reparation or civil litigation:

10/27/2023

Customer Complaint Information

Date Complaint Received:

11/02/2023

Complaint Pending?

Yes

Settlement Amount:

Individual Contribution Amount:

Broker Statement

The investment products referenced above were sold to Mr. Forecash in May of 2016 by Silver Oak Securities ("SOS"), a broker-dealer located in Jackson, TN, and by Mr. Johnson as a Registered Representative of SOS at that time. As a registered broker-dealer, SOS was accountable and responsible for supervision of its registered representatives and for the suitability of investment products sold through SOS by its registered representatives. Mr. Forecash's complaint was presented to SOS; Mr. Johnson has not seen the complaint and, he has not been affiliated with SOS since April 2017.

Disclosure 2 of 6

Reporting Source:

Firm

Employing firm when activities occurred which led to the complaint:

SILVER OAK SECURITIES, INCORPORATED

Allegations:

DRP WAS FILED IN ERROR

Product Type:

Real Estate Security

Alleged Damages:

\$5,000.00



Alleged Damages Amount
Explanation (if amount not exact):

DRP WAS FILED IN ERROR

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: 08/25/2023

Complaint Pending? No

Status: Closed/No Action

Status Date: 10/04/2023

Settlement Amount:

Individual Contribution Amount:

Firm Statement **DRP WAS FILED IN ERROR**

Disclosure 3 of 6

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: Silver Oak Securities, Inc.

Allegations: Written complaint alleges, "...these investments were illiquid for 10 years, which in itself is not a suitable time horizon. A simple review of... client profile... showing the lowest possible investment tolerance risk confirms... investments did not meet a suitability standard."

Product Type: Real Estate Security

Alleged Damages: \$104,250.71

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: 06/28/2023

Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:

Reporting Source: Individual

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

Silver Oak Securities, Inc.

Allegations:

Written complaint alleges, "these investments were illiquid for 10 years, which in itself is not a suitable time horizon. A simple review of client profile showing the lowest possible investment tolerance risk confirms investments did not meet a suitability standard."

Product Type:

Real Estate Security

Alleged Damages:

\$104,250.71

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:**

06/28/2023

Complaint Pending?

Yes

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

This complaint, on behalf of [REDACTED] has not been provided to Mr. Johnson. The complaint was delivered to Silver Oak Securities ("SOS"), a broker-dealer located in Jackson, TN for which Mr. Johnson was a Registered Representative until approximately April 2017. As a registered broker-dealer, SOS was accountable and responsible for supervision of its registered representatives and for the suitability of all investment products sold through SOS by its registered representatives. A previous complaint by Mrs. [REDACTED] received 08/24/2022 with alleged damages of \$100,000 has previously been reviewed and denied by Mr. Johnson.

Disclosure 4 of 6**Reporting Source:**

Firm

Employing firm when activities occurred which led to the complaint:

SILVER OAK SECURITIES, INCORPORATED

Allegations:

"The Complainant claims that high-risk, non-publicly traded, illiquid, alternative investments were purchased for them by Joel Johnson that do not align with their conservative to moderately conservative risk tolerance. The Complainant claims that the alternative investments were unsuitable. The Complainant indicates that they have suffered a loss exceeding \$100,000 and are seeking restitution for all losses related to all alternative investments recommended and sold by representatives of SOS."

Product Type:

Real Estate Security

Alleged Damages:

\$100,000.00

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: 08/24/2022

Complaint Pending? No

Status: Denied

Status Date: 08/24/2022

Settlement Amount:

Individual Contribution
Amount:

Reporting Source: Individual

Employing firm when
activities occurred which led
to the complaint: SILVER OAK SECURITIES, INCORPORATED

Allegations: "The Complainant claims that high-risk, non-publicly traded, illiquid, alternative investments were purchased for them by Joel Johnson that do not align with their conservative to moderately conservative risk tolerance. The Complainant claims that the alternative investments were unsuitable. The Complainant indicates that they have suffered a loss exceeding \$100,000 and are seeking restitution for all losses related to all alternative investments recommended and sold by representatives of Johnson Brunetti."

Product Type: Other: Alternative Investments

Alleged Damages: \$100,000.00

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: 08/24/2022

Complaint Pending? No

Status: Denied

Status Date: 08/24/2022

Settlement Amount:

Individual Contribution
Amount:

Broker Statement The alternative investments referenced above were sold to [REDACTED] (the "Complainant") by Silver Oak Securities ("SOS"), a broker-dealer located in Jackson, TN, and Mr. Joel Johnson, as a registered representative affiliated with SOS and supervised by SOS. The investments were not sold by JB Capital, LLC ("JBC") (dba Johnson Brunetti) or by any individual in their capacity as an investment advisor representative affiliated with JBC. SOS, the broker-dealer, maintained ultimate responsibility for suitability determinations of these alternative investments. No investment advisor representative affiliated with JBC has been



affiliated with SOS since April 2017.

Two of the alternative investments performed as expected and returned steady income streams and positive returns. One alternative investment did not perform as expected, but the Claimant did not suffer a loss as described as described under "Alleged Damages". Furthermore, each of the alternative investments bought by [REDACTED] was reviewed with them, and they signed a subscription agreement for each. They also received the prospectus for each investment. Additionally, [REDACTED] signed certain attestations including indicating that they understood the risk of investing in non-liquid alternative investments, the liquidity risks involved with purchasing an alternative investment, that the time horizon involved was long-term and that there was no public market for the alternative investments. The Complainant's claim that they had a "conservative to moderately conservative risk tolerance" is inconsistent with their documented assertion that their risk tolerance is "Moderate". Moreover, the alternative investments were part of a far larger portfolio the Complainant maintained that included significant holdings in annuities, diversified stock holdings, and cash. Reasonably allocating certain funds to investments such as alternative investments within the overall portfolio was determined entirely appropriate and consistent with their Moderate risk profile.

Disclosure 5 of 6

Reporting Source:

Firm

Employing firm when activities occurred which led to the complaint:

SILVER OAK SECURITIES, INCORPORATED

Allegations:

Written notice of customer complaint received from the State of Connecticut. Per the letter from the State of Connecticut, "The Complainant claims that speculative and illiquid, alternative investments were sold to her by Joel Johnson. At the time, Joel Johnson represented both SOS and JBC. The Complainant claims that these investments were unsuitable and that she would have never purchased the alternative investments had she been given a balanced presentation that explained the investment's speculative and illiquid nature."

Product Type:

Real Estate Security

Alleged Damages:

\$20,000.00

Alleged Damages Amount Explanation (if amount not exact):

The firm was not able to make a good faith determination that the damages from the alleged conduct 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:

11/29/2021

Complaint Pending?

Yes

Settlement Amount:

Individual Contribution Amount:



Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: SILVER OAK SECURITIES, INCORPORATED

Allegations: [REDACTED] claims that speculative and illiquid, alternative investments were sold to her by Joel Johnson. [REDACTED] claims that these investments were unsuitable and that she would have never purchased the alternative investments had she been given a balanced presentation that explained the investment's speculative and illiquid nature.

Product Type: Other: Alternative Investment

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): Complaint is reported in response to Complaint reporting by Silver Oak Securities, Incorporated.

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: 11/29/2021

Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:

Broker Statement

The alternative investments were sold to [REDACTED] by Silver Oak Securities ("SOS"), a broker-dealer located in Jackson, TN, and registered representatives affiliated with SOS, including Mr. Johnson, and supervised by SOS which maintains ultimate accountability for the suitability of these investments. [REDACTED] claims are false. Each of the seven alternative investments bought by [REDACTED] was adequately presented to her and reviewed with her, and she signed a subscription agreement for each. She also received the prospectus for each investment. Additionally, [REDACTED] signed certain attestations including indicating that she understood the liquidity risks involved with purchasing an alternative investment, that the time horizon involved was long-term and that there was no public market for the alternative investments. Moreover, the alternative investments were part of a far larger portfolio [REDACTED] maintained that included holdings in annuities, diversified stock holdings, and cash. Allocating certain funds to investments such as alternative investments within the overall portfolio was determined suitable.

Disclosure 6 of 6

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: SILVER OAK SECURITIES, INCORPORATED

Allegations: Written notification of complaint received from the State of Connecticut. Connecticut letter states, "The Complainant claims that speculative and illiquid, alternative investments were purchased for them by Joel Johnson without their



knowledge. Additionally, they accuse someone at Johnson Brunetti of changing their risk tolerance from low/moderate to moderately aggressive without their approval. The Complainant claims that these investments were unsuitable given the risk that they were willing to take and that they would have never purchased the alternative investments had they been given a balanced presentation that explained the investment's speculative and illiquid nature. The Complainant indicates that they have suffered an approximate loss of \$80,000."

On 8/25/23 Firm received written complaint from customer alleging "Unauthorized transactions that were made by Joel Johnson without our prior knowledge."

Product Type: Real Estate Security

Alleged Damages: \$80,000.00

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: 12/10/2021

Complaint Pending? No

Status: Settled

Status Date: 07/17/2024

Settlement Amount: \$50,000.00

**Individual Contribution
Amount:** \$0.00

Reporting Source: Individual

**Employing firm when
activities occurred which led
to the complaint:** SILVER OAK SECURITIES, INCORPORATED

Allegations: [REDACTED] claim that speculative and illiquid, alternative investments were purchased for them by Joel Johnson without their knowledge. Additionally, they accuse someone at Johnson Brunetti of changing their risk tolerance from low/moderate to moderately aggressive without their approval. The [REDACTED] claim that these investments were unsuitable given the risk that they were willing to take and that they would have never purchased the alternative investments had they been given a balanced presentation that explained the investment's speculative and illiquid nature.

Product Type: Other: Alternative Investment

Alleged Damages: \$80,000.00

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: 12/10/2021



Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:

Broker Statement

Alternative investments were sold to [REDACTED] by Silver Oak Securities ("SOS"), a broker-dealer located in Jackson, TN, and registered representatives affiliated with SOS, including Mr. Johnson, and supervised by SOS which maintains ultimate accountability for the suitability of these investments. The [REDACTED]' claim that the investments were purchased without their knowledge and without a "balanced presentation", and that someone changed their risk tolerance, is patently false. Each of the alternative asset subscription agreements were completed with and signed by the [REDACTED]. They also received the prospectus for each investment. Additionally, the [REDACTED] signed certain attestations including indicating that they acknowledged receipt of the prospectus for each alternative investment, understood the liquidity risks involved with purchasing an alternative investment, that the time horizon involved was long-term and that there was no public market for the alternative investments. The [REDACTED] not only received an appropriate discussion of the risks associated with the investments but also provided acknowledged documentation that they did receive such a presentation. Moreover, the alternative investments were part of a far larger portfolio the [REDACTED] maintained that included holdings in annuities, diversified stock holdings, and cash. Allocating certain funds to investments such as alternative investments within the overall portfolio was determined appropriate. This allocation between market, safe and alternative was discussed and presented to the [REDACTED] on several meeting occasions and is well documented. The [REDACTED] indicated that "they have suffered a loss of \$80,000." This claim too is patently false and entirely unsupported.



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: ING FINANCIAL PARTNERS, INC.
Termination Type: Discharged
Termination Date: 11/13/2006
Allegations: VIOLATION OF STATE INSURANCE STATUES
Product Type: Insurance
Other Product Types:

Firm Statement ON SEPT 21, 2006, REP NAMED AS RESPONDENT IN A COMPLAINT ISSUED BY THE STATE OF CONNECTICUT INSURANCE DEPARTMENT. STATE OF CONNECTICUT ISSUED COMPLAINT HAVING REASONS TO BELIEVE THAT REP ENGAGED IN ACTS OF CONDUCT WHICH, IF TRUE, WOULD VIOLATE CONNECTICUT GENERAL STATUES.

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Reporting Source: Individual
Firm Name: ING FINANCIAL PARTNERS
Termination Type: Permitted to Resign
Termination Date: 11/03/2006
Allegations: FAILURE TO DISCLOSE THE AFORMENTIONED ACTION BY THE CONNETICUT INSURANCE DIVISION
Product Type: Insurance
Broker Statement I DID DISCLOSE THE INFORMATION TO ING FINANCIAL PARTNERS IN A TIMELY MANNER.



End of Report

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