



IAPD Report
Kurt Sylvia
CRD# 1966373

| <u>Section Title</u> | <u>Page(s)</u> |
|-------------------------------------|-----------------------|
| Report Summary | 1 |
| Qualifications | 2 - 9 |
| Registration and Employment History | 11 - 14 |
| Disclosure Information | 15 |

i 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

Kurt Sylvia (CRD# 1966373)

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 **02/03/2026**.

CURRENT EMPLOYERS

| | Firm | CRD# | Registered Since |
|-----------|----------------------------|---------|------------------|
| B | J.P. MORGAN SECURITIES LLC | CRD# 79 | 11/30/2017 |
| IA | J.P. MORGAN SECURITIES LLC | CRD# 79 | 11/30/2017 |

QUALIFICATIONS

This representative is currently registered in **27** SRO(s) and **51** jurisdiction(s).

Is this representative currently Inactive or Suspended with any regulator? **No**

Note: Not all jurisdictions require IAR registration or may have an exemption from registration.

Additional information including this individual's qualification examinations and professional designations is available in the Detailed Report.

REGISTRATION HISTORY

This representative was previously registered with the following firm(s):

| | FIRM | CRD# | LOCATION | REGISTRATION DATES |
|-----------|-----------------------------|-------|----------------|-------------------------|
| IA | UBS FINANCIAL SERVICES INC. | 8174 | BOCA RATON, FL | 12/10/2008 - 12/11/2017 |
| B | UBS FINANCIAL SERVICES INC. | 8174 | BOCA RATON, FL | 11/21/2008 - 12/11/2017 |
| B | WACHOVIA SECURITIES, LLC | 19616 | LANTANA, FL | 10/01/2000 - 11/24/2008 |

For additional registration and employment history details as reported by the individual, refer to the Registration and Employment History section of the Detailed Report.

DISCLOSURE INFORMATION

Disclosure events include certain criminal charges and convictions, formal investigations and disciplinary actions initiated by regulators, customer disputes and arbitrations, and financial disclosures such as bankruptcies and unpaid judgments or liens.

Are there events disclosed about this representative? **Yes**

The following types of events are disclosed about this representative:

| Type | Count |
|------------------|-------|
| Customer Dispute | 3 |



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 **51** jurisdiction(s) and 27 SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **J.P. MORGAN SECURITIES LLC**
Main Address: 270 PARK AVENUE
NEW YORK, NY 10017
Firm ID#: 79

| Regulator | Registration | Status | Date |
|------------------------------------|-------------------------------------|----------|------------|
| B 24X National Exchange LLC | General Securities Representative | Approved | 10/31/2025 |
| B BOX Exchange LLC | General Securities Representative | Approved | 11/30/2017 |
| B BOX Exchange LLC | General Securities Sales Supervisor | Approved | 11/30/2017 |
| B Cboe BYX Exchange, Inc. | General Securities Representative | Approved | 11/13/2024 |
| B Cboe BZX Exchange, Inc. | General Securities Representative | Approved | 11/13/2024 |
| B Cboe C2 Exchange, Inc. | General Securities Representative | Approved | 11/30/2017 |
| B Cboe C2 Exchange, Inc. | General Securities Sales Supervisor | Approved | 11/30/2017 |
| B Cboe EDGA Exchange, Inc. | General Securities Representative | Approved | 11/13/2024 |
| B Cboe EDGA Exchange, Inc. | General Securities Sales Supervisor | Approved | 11/13/2024 |
| B Cboe EDGX Exchange, Inc. | General Securities Representative | Approved | 11/13/2024 |
| B Cboe EDGX Exchange, Inc. | General Securities Sales Supervisor | Approved | 11/13/2024 |
| B Cboe Exchange, Inc. | General Securities Representative | Approved | 11/30/2017 |
| B Cboe Exchange, Inc. | General Securities Sales Supervisor | Approved | 11/30/2017 |



Qualifications

| Regulator | Registration | Status | Date |
|---|-------------------------------------|----------|------------|
| B FINRA | General Securities Representative | Approved | 11/30/2017 |
| B FINRA | General Securities Sales Supervisor | Approved | 11/30/2017 |
| B FINRA | Invest. Co and Variable Contracts | Approved | 11/30/2017 |
| B Investors' Exchange LLC | General Securities Representative | Approved | 11/30/2017 |
| B Long-Term Stock Exchange, Inc. | General Securities Representative | Approved | 04/27/2020 |
| B MEMX LLC | General Securities Representative | Approved | 02/16/2021 |
| B MEMX LLC | General Securities Sales Supervisor | Approved | 02/16/2021 |
| B MIAX Emerald, LLC | General Securities Representative | Approved | 03/20/2019 |
| B MIAX Emerald, LLC | General Securities Sales Supervisor | Approved | 03/20/2019 |
| B MIAX PEARL, LLC | General Securities Representative | Approved | 11/13/2024 |
| B MIAX PEARL, LLC | General Securities Sales Supervisor | Approved | 11/13/2024 |
| B MIAX Sapphire | General Securities Representative | Approved | 11/13/2024 |
| B MIAX Sapphire | General Securities Sales Supervisor | Approved | 11/13/2024 |
| B Miami International Securities Exchange, LLC | General Securities Representative | Approved | 11/13/2024 |
| B Miami International Securities Exchange, LLC | General Securities Sales Supervisor | Approved | 11/13/2024 |
| B NYSE American LLC | General Securities Representative | Approved | 11/30/2017 |
| B NYSE American LLC | General Securities Sales Supervisor | Approved | 10/01/2018 |
| B NYSE Arca, Inc. | General Securities Representative | Approved | 11/30/2017 |



Qualifications

| Regulator | Registration | Status | Date |
|---------------------------|-------------------------------------|----------|------------|
| B NYSE Arca, Inc. | General Securities Sales Supervisor | Approved | 11/30/2017 |
| B NYSE National, Inc. | General Securities Representative | Approved | 05/18/2018 |
| B NYSE National, Inc. | General Securities Sales Supervisor | Approved | 11/13/2024 |
| B NYSE Texas, Inc. | General Securities Representative | Approved | 11/30/2017 |
| B NYSE Texas, Inc. | General Securities Sales Supervisor | Approved | 03/01/2019 |
| B Nasdaq GEMX, LLC | General Securities Representative | Approved | 11/30/2017 |
| B Nasdaq GEMX, LLC | General Securities Sales Supervisor | Approved | 10/01/2018 |
| B Nasdaq ISE, LLC | General Securities Representative | Approved | 11/30/2017 |
| B Nasdaq ISE, LLC | General Securities Sales Supervisor | Approved | 10/01/2018 |
| B Nasdaq MRX, LLC | General Securities Representative | Approved | 11/30/2017 |
| B Nasdaq MRX, LLC | General Securities Sales Supervisor | Approved | 10/01/2018 |
| B Nasdaq PHLX LLC | General Securities Representative | Approved | 11/30/2017 |
| B Nasdaq PHLX LLC | General Securities Sales Supervisor | Approved | 11/30/2017 |
| B Nasdaq Stock Market | General Securities Representative | Approved | 11/30/2017 |
| B Nasdaq Stock Market | General Securities Sales Supervisor | Approved | 11/30/2017 |
| B Nasdaq Texas, LLC | General Securities Representative | Approved | 11/30/2017 |
| B Nasdaq Texas, LLC | General Securities Sales Supervisor | Approved | 11/30/2017 |
| B New York Stock Exchange | General Securities Representative | Approved | 11/30/2017 |
| B New York Stock Exchange | General Securities Sales Supervisor | Approved | 10/01/2018 |



Qualifications

| Regulator | Registration | Status | Date |
|-------------------------------|-----------------------------------|----------|------------|
| B Alabama | Agent | Approved | 12/01/2017 |
| B Alaska | Agent | Approved | 12/04/2017 |
| B Arizona | Agent | Approved | 12/04/2017 |
| B Arkansas | Agent | Approved | 12/01/2017 |
| B California | Agent | Approved | 11/30/2017 |
| B Colorado | Agent | Approved | 12/06/2017 |
| B Connecticut | Agent | Approved | 12/04/2017 |
| B Delaware | Agent | Approved | 12/08/2017 |
| B District of Columbia | Agent | Approved | 12/11/2017 |
| B Florida | Agent | Approved | 12/04/2017 |
| IA Florida | Investment Adviser Representative | Approved | 12/04/2017 |
| B Georgia | Agent | Approved | 12/05/2017 |
| B Hawaii | Agent | Approved | 12/04/2017 |
| B Idaho | Agent | Approved | 11/30/2017 |
| B Illinois | Agent | Approved | 11/30/2017 |
| B Indiana | Agent | Approved | 12/11/2017 |
| B Iowa | Agent | Approved | 12/11/2017 |
| B Kansas | Agent | Approved | 12/06/2017 |
| B Kentucky | Agent | Approved | 12/11/2017 |



Qualifications

| Regulator | Registration | Status | Date |
|-------------------|-----------------------------------|----------|------------|
| IA Louisiana | Investment Adviser Representative | Approved | 12/05/2017 |
| B Louisiana | Agent | Approved | 12/11/2017 |
| B Maine | Agent | Approved | 12/07/2017 |
| B Maryland | Agent | Approved | 12/04/2017 |
| B Massachusetts | Agent | Approved | 01/10/2018 |
| B Michigan | Agent | Approved | 12/12/2017 |
| B Minnesota | Agent | Approved | 12/11/2017 |
| B Mississippi | Agent | Approved | 12/07/2017 |
| B Missouri | Agent | Approved | 12/05/2017 |
| B Nebraska | Agent | Approved | 01/08/2018 |
| B Nevada | Agent | Approved | 12/11/2017 |
| B New Hampshire | Agent | Approved | 08/23/2024 |
| B New Jersey | Agent | Approved | 12/06/2017 |
| B New Mexico | Agent | Approved | 12/08/2017 |
| B New York | Agent | Approved | 12/05/2017 |
| IA New York | Investment Adviser Representative | Approved | 07/23/2025 |
| IA North Carolina | Investment Adviser Representative | Approved | 12/01/2017 |
| B North Carolina | Agent | Approved | 12/11/2017 |
| B North Dakota | Agent | Approved | 12/05/2017 |



Qualifications

| Regulator | Registration | Status | Date |
|------------------|-----------------------------------|---------------------|------------|
| IA Ohio | Investment Adviser Representative | Approved | 11/30/2017 |
| B Ohio | Agent | Approved | 12/11/2017 |
| B Oklahoma | Agent | Approved | 12/04/2017 |
| B Oregon | Agent | Approved | 11/30/2017 |
| B Pennsylvania | Agent | Approved | 12/01/2017 |
| B Puerto Rico | Agent | Approved | 12/11/2017 |
| B Rhode Island | Agent | Approved | 12/06/2017 |
| B South Carolina | Agent | Approved | 12/05/2017 |
| B South Dakota | Agent | Approved | 12/11/2017 |
| B Tennessee | Agent | Approved | 12/05/2017 |
| B Texas | Agent | Approved | 11/30/2017 |
| IA Texas | Investment Adviser Representative | Restricted Approval | 11/30/2017 |
| B Utah | Agent | Approved | 11/30/2017 |
| B Vermont | Agent | Approved | 12/05/2017 |
| B Virginia | Agent | Approved | 12/05/2017 |
| B Washington | Agent | Approved | 12/05/2017 |
| B West Virginia | Agent | Approved | 12/13/2017 |
| B Wisconsin | Agent | Approved | 12/07/2017 |



Qualifications

| Regulator | Registration | Status | Date |
|------------------|--------------|----------|------------|
| B Wyoming | Agent | Approved | 12/11/2017 |

Branch Office Locations

J.P. MORGAN SECURITIES LLC
3825 PGA BLVD
8TH AND 9TH FLOOR
PALM BEACH GARDENS, FL 33410

J.P. MORGAN SECURITIES LLC
277 PARK AVENUE
2ND & 3RD FLOOR
NEW YORK, NY 10172

J.P. MORGAN SECURITIES LLC
Jupiter, FL





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



Principal/Supervisory Exams

| Exam | Category | Date |
|--|-----------|------------|
|  General Securities Sales Supervisor - General Module Examination (S10) | Series 10 | 06/13/2002 |
|  General Securities Sales Supervisor - Options Module Examination (S9) | Series 9 | 04/29/2002 |

General Industry/Product Exams

| Exam | Category | Date |
|--|-----------|------------|
|  Securities Industry Essentials Examination (SIE) | SIE | 10/01/2018 |
|  Futures Managed Funds Examination (S31) | Series 31 | 07/23/2004 |
|  General Securities Representative Examination (S7) | Series 7 | 12/31/1997 |
|  Investment Company Products/Variable Contracts Representative Examination (S6) | Series 6 | 07/14/1993 |
|  Municipal Securities Representative Examination (S52) | Series 52 | 06/09/1993 |

State Securities Law Exams

| Exam | Category | Date |
|--|-----------|------------|
|  Uniform Investment Adviser Law Examination (S65) | Series 65 | 02/29/2000 |
|  Uniform Securities Agent State Law Examination (S63) | Series 63 | 10/08/1993 |



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 | 12/10/2008 - 12/11/2017 | UBS FINANCIAL SERVICES INC. | CRD# 8174 | BOCA RATON, FL |
| B | 11/21/2008 - 12/11/2017 | UBS FINANCIAL SERVICES INC. | CRD# 8174 | BOCA RATON, FL |
| B | 10/01/2000 - 11/24/2008 | WACHOVIA SECURITIES, LLC | CRD# 19616 | LANTANA, FL |
| IA | 10/01/2000 - 11/24/2008 | WACHOVIA SECURITIES, LLC | CRD# 19616 | LANTANA, FL |
| B | 08/19/1999 - 10/01/2000 | FIRST UNION BROKERAGE SERVICES, INC. | CRD# 8112 | CHARLOTTE, NC |
| B | 06/10/1993 - 08/25/1999 | FIRST MIAMI SECURITIES, INC. | CRD# 7793 | BOCA RATON, FL |
| B | 09/22/1989 - 09/29/1989 | FIRST INVESTORS CORPORATION | CRD# 305 | EDISON, NJ |

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 |
|-------------------|---|-------------------|--------------------|---------------------------------------|
| 02/2025 - Present | Hawksbill 90 LLC | Owner/Partner | Y | hobe Sound, FL, United States |
| 02/2020 - Present | Hawksbill 90, LLC | Partial Owner | Y | Hobe Sound, FL, United States |
| 11/2017 - Present | JPMORGAN CHASE BANK, N.A. | FINANCIAL ADVISOR | Y | PALM BEACH GARDENS, FL, United States |
| 11/2017 - Present | JPMORGAN SECURITIES, LLC. | FINANCIAL ADVISOR | Y | PALM BEACH GARDENS, FL, United States |
| 06/2016 - Present | TRIPLETALE MARINE LLC | PARTIAL OWNER | N | TEQUESTA, FL, United States |
| 12/2022 - 09/2025 | Tripletale LLC | Owner/Partner | N | Jupiter, FL, United States |
| 06/2024 - 12/2024 | 420 426 Claremore Drive NDT development | Owner/Partner | N | JUPITER, FL, United States |
| 08/2023 - 12/2024 | 7 white llc | Owner/Partner | N | SOMERVILLE, MA, United States |



Registration & Employment History

EMPLOYMENT HISTORY

| Employment Dates | Employer Name | Position | Investment Related | Employer Location |
|-------------------|----------------------------|-------------------|--------------------|-------------------------------|
| 11/2008 - 11/2017 | UBS FINANCIAL SERVICES INC | FINANCIAL ADVISOR | Y | PALM BEACH, FL, 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.

Entity Name: Clear Blue Smiles
 Investment related: No
 Add: Nantucket MA
 Nature: Medical
 Position/Title/Relationship: Owner/Partner
 Start Date: 03/17/2025
 Approx hrs a week: 0-10
 Approx hrs during securities trading hours: 0
 duties: none

Entity Name: Hawksbill 90 LLC
 Investment related: Yes
 Address: 90 Hawksbill, hobe Sound , FL
 Nature of the other business: Real Estate
 Position/Title/Relationship: Owner/Partner
 Start Date: 02/13/2025
 Approx hrs a week: 0-10
 Approx trading hours: 0
 duties: LLC formed for me as limited partner to invest into Residential real estate speculation properties

Entity: Techie kids club
 Investment related: No
 Add: Boca Raton, FL 33432 techiekidsclub.com
 business: Educational
 Position: Owner/Partner
 Start Date: 12/04/2023
 Approx hrs a week: 0-10
 Approx hrs during securities trading hrs: 0
 duties: This is a early education company. People on my team, not I, are the relationship managers

Entity: caddy Barks LLC
 Inv related: No
 Address: 7 castle Lane Sandwich ma
 business: Customization
 Position: Owner/Partner
 Start Date: 11/21/2022



Registration & Employment History



OTHER BUSINESS ACTIVITIES

Approx hrs a month: 0-10
Approx hrs during securities trading hrs: 0
duties: partial ownership of a custom golf engraving company

Entity: 14 16 sheeps pond llc
Inv related: N
Address: Furnari Law Fairfield CT 06824
business: Real Estate
Position: Owner/ Partner
Start Date: 01/31/2022
Approx hrs a month: 0-10
Approx hrs during securities trading hrs: 0
duties: investing into llc to do develop home in Nantucket ma

Entity: Veritus Capital TK SPV LLC
Inv related: N
Address: 152 Oxford Blvd., Garden City, New York 11530
Nature business: Consulting
Position: owner/partner
Start Date: 11/08/2021
Approx hrs a month: 0-10
Approx hrs during securities trading hrs: 0-10
duties: None only investor

Entity: Hawksbill 90, LLC
Inv related: Yes
Address: 90 hobe Sound , FL
business: own a home to sell it.
Position: Partial Owner
Start Date: 11-Feb-2020
Approx hrs a month: 0
Approx hrs during securities trading hrs: 0
duties: none

Entity: 10 Ellens Way
Inv related: Yes
Address: 10 Nantucket, Ma
business: Summer home that I rent 4 weeks annually I do this every year.
Position: Owner
Start Date: 01-Dec-2016
Approx hrs a month: 0
Approx hrs during securities trading hrs: 0
duties: Owner

Entity: Princeton Properties/ Haley Park Apartments
Inv related: N/A
Address: 742 Swanzey, NH
Nature business: Apartment Units
Position: Owner/Operator
Start Date: 04-Nov-2019



Registration & Employment History



OTHER BUSINESS ACTIVITIES

Approx hrs a month: 0
Approx hrs during securities trading hrs: 0
duties: Owner/Operator of Apartment Units

Entity: Tripleta Marine LLC
Inv related: No
Address: Tequesta, Florida
business: Part owner of a boat.
Position: Partial Owner
Start Date: 01-Jun-2016
Approx hrs a month: indefinite
Approx hrs during securities trading hrs: 0
duties: The boat is used strictly for pleasure. Responsible for the upkeep of the boat and any expenses related to boat.

Entity: Stetson University
Inv related: Yes
Address: 421 Deland, Florida
business: University
Position: Board Member
Start Date: 05-Oct-2017
Approx hrs a month: it's a total of 8 hours twice a year.
Approx hrs during securities trading hrs: 0
duties: The board meets to discuss the school finances and any other details that need to be taken care of



Disclosure Summary

Disclosure Information

What you should know about reported disclosure events:

(1) Certain thresholds must be met before an event is reported to IARD, for example:

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

(2) Disclosure events in IAPD reports come from different sources:

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

(3) There are different statuses and dispositions for disclosure events:

- A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
 - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

(4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.



DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

| Type | Count |
|------------------|-------|
| Customer Dispute | 3 |

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 3

| | |
|--|---|
| Reporting Source: | Firm |
| Employing firm when activities occurred which led to the complaint: | WACHOVIA SECURITIES, LLC |
| Allegations: | ATTORNEY FOR FLORIDA RESIDENTS WRITES THAT FA OVERCONCENTRATED CLIENTS IN FINANCIAL PREFERRED AND IN UITS WITH SUBPRIME MORTGAGE DEBT. HE ALSO CLAIMS THAT FA MISREPRESENTED THE QUALITY OF FNMA PREFERRED, BY STATING THAT THEY WERE AAA RATED. ATTORNEY HAS MADE A DEMAND FOR \$1 MILLION IN MARKET LOSSES. (01/22/2008 - 08/14/2008) |
| Product Type: | Other: FREDDIE MAC-FANNIE MAE |
| Alleged Damages: | \$1,000,000.00 |
| 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: | 03/31/2009 |
| Complaint Pending? | No |
| Status: | Settled |
| Status Date: | 04/27/2009 |
| Settlement Amount: | \$50,000.00 |



Individual Contribution Amount: \$25,000.00

Firm Statement CLAIM DENIED. FINANCIALS WERE PART OF \$7.5 MILLION PORTFOLIO THAT ALSO CONTAINED DIVERSED ALLOCATION OF STOCKS AND MUTUAL FUNDS. FINANCIALS AND UITs MET CLIENT'S OBJECTIVES FOR INCOME, INCLUDING TAX-SENSITIVE INCOME. CLIENT'S LOSSES IN THIS ACCOUNT WERE 10% OF ASSETS AT WACHOVIA.
*****CLAIM SETTLED FOR \$50,000 TO AVOID MORE COSTLY FORMAL PROCEEDINGS WITHOUT ADMITTING ANY LIABILITY WHATSOEVER.

.....

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: WACHOVIA SECURITIES, LLC

Allegations: ATTORNEY FOR FLORIDA RESIDENTS WRITES THAT FA OVERCONCENTRATED CLIENTS IN FINANCIAL PREFERREDs AND IN UITs WITH SUBPRIME MORTGAGE DEBT. HE ALSO CLAIMS THAT FA MISREPRESENTED THE QUALITY OF FNMA PREFERREDs, BY STATING THAT THEY WERE AAA RATED. ATTORNEY HAS MADE A DEMAND FOR \$1 MILLION IN MARKET LOSSES. (01/22/2008 - 08/14/2008)

Product Type: Other: FREDDIE MAC-FANNIE MAE

Alleged Damages: \$1,000,000.00

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: 03/31/2009

Complaint Pending? No

Status: Settled

Status Date: 04/27/2009

Settlement Amount: \$50,000.00

Individual Contribution Amount: \$25,000.00

Broker Statement CLAIM DENIED. FINANCIALS WERE PART OF \$7.5 MILLION PORTFOLIO THAT ALSO CONTAINED DIVERSED ALLOCATION OF STOCKS AND MUTUAL FUNDS. FINANCIALS AND UITs MET CLIENT'S OBJECTIVES FOR INCOME, INCLUDING TAX-SENSITIVE INCOME. CLIENT'S LOSSES IN THIS ACCOUNT WERE 10% OF ASSETS AT WACHOVIA. *****CLAIM SETTLED FOR \$50,000 TO AVOID MORE COSTLY FORMAL PROCEEDINGS WITHOUT ADMITTING ANY LIABILITY WHATSOEVER.

Disclosure 2 of 3

Reporting Source: Regulator



Employing firm when activities occurred which led to the complaint: WACHOVIA SECURITIES, LLC

Allegations: NEGLIGENCE MISREPRESENTATION; BREACH OF FIDUCIARY DUTY

Product Type: Other: LIFE INSURANCE COMPANY ANNUITIES

Alleged Damages: \$4,500,976.81

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: [FINRA - CASE #08-02454](#)

Date Notice/Process Served: 07/14/2008

Arbitration Pending? No

Disposition: Award

Disposition Date: 07/21/2009

Disposition Detail: SYLVIA IS JOINTLY AND SEVERALLY LIABLE FOR BREACH OF FIDUCIARY DUTY AND SHALL PAY COMPENSATORY DAMAGES AND PRE-JUDGMENT INTEREST TOTALING \$143,000.

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: WACHOVIA SECURITIES, LLC

Allegations: CLAIMANTS ALLEGED WACHOVIA AND FA MADE FALSE STATEMENTS REGARDING THE RESETTING OF INTEREST RATES IN ACCORDANCE WITH AN INCREASE IN THE PRIME RATE ON THE ANNUITIES PURCHASED BY THE CLAIMANTS. ALLEGED DAMAGES, UNSPECIFIED, BUT BELIEVED TO EXCEED \$5000. (ACCOUNTS OPENED APPROXIMATELY SEPTEMBER 2002). CLAIMANTS REQUESTED ALLEGED DAMAGES OF \$4.5 MILLION PLUS PUNITIVE DAMAGES AND ATTORNEYS' FEES.

Product Type: Annuity-Variable

Alleged Damages: \$4,500,000.00

Customer Complaint Information

Date Complaint Received: 08/05/2008

Complaint Pending?

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA

Docket/Case #: [08-02454](#)

Date Notice/Process Served: 08/05/2008



Arbitration Pending? No
Disposition: Award to Customer
Disposition Date: 07/20/2009
Monetary Compensation Amount: \$143,000.00
Individual Contribution Amount: \$0.00
Firm Statement RESPONDENTS DEFENDED THE ARBITRATION AND THE PANEL AWARDED CLAIMANTS A TOTAL OF \$143,000.

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: WACHOVIA SECURITIES, LLC
Allegations: CLAIMANT IS ALLEGING WACHOVIA AND FA KURT SYLVIA MADE FALSE STATEMENTS REGARDING THE RESETTING OF INTEREST RATES IN ACCORDANCE WITH AN INCREASE IN THE PRIME RATE ON THE ANNUITIES PURCHASED BY THE CLAIMANT. ALLEGES DAMAGES, UNSPECIFIED. ALLEGED DAMAGES, UNSPECIFIED. DAMAGES BELIEVED TO EXCEED \$5000.00. (ACCOUNTS OPENED APPROXIMATELY SEPTEMBER 2002)
Product Type: Annuity-Variable
Alleged Damages: \$0.00
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: 08/05/2008
Complaint Pending? No
Status: Evolved into Arbitration/CFTC reparation (the individual is a named party)
Status Date: 08/05/2008
Settlement Amount:
Individual Contribution Amount:

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA
Docket/Case #: [08-02454](#)
Date Notice/Process Served: 08/05/2008
Arbitration Pending? No
Disposition: Award to Customer



Disposition Date: 07/21/2009
Monetary Compensation Amount: \$143,000.00
Individual Contribution Amount: \$0.00

Disclosure 3 of 3

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: WACHOVIA SECURITIES, LLC

Allegations: FLORIDA RESIDENT SAYS THAT FORD AND GM BONDS, CNL REIT, HIGH INCOME UIT, AND INCOME MUTUAL FUNDS WERE NOT SUITABLE FOR 95-YEAR-OLD INVESTOR. UNREALIZED LOSSES ARE APPROXIMATELY \$48,000.

Product Type: Debt - Corporate
Alleged Damages: \$48,000.00

Customer Complaint Information

Date Complaint Received: 12/02/2005
Complaint Pending? No
Status: Settled
Status Date: 05/26/2006
Settlement Amount: \$17,000.00
Individual Contribution Amount: \$8,500.00

Broker Statement VERBAL COMPLAINT THAT SETTLED FOR \$17,000 IN THE INTEREST OF CLIENT RELATIONS, AND TO AVOID MORE COSTLY FORMAL PROCEEDINGS, WITHOUT ADMITTING ANY LIABILITY WHATSOEVER.



End of Report

This page is intentionally left blank.