



IAPD Report

RITA MANSOUR

CRD# 1968418

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Qualifications	2 - 5
Registration and Employment History	7
Disclosure Information	8

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

RITA MANSOUR (CRD# 1968418)

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 **09/05/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	MCDONALD PARTNERS LLC	CRD# 135414	09/15/2006
IA	MCDONALD PARTNERS LLC	CRD# 135414	09/25/2006

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **35** 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	MCDONALD INVESTMENTS INC.	566	TOLEDO, OH	11/22/1999 - 10/04/2006
B	MCDONALD INVESTMENTS INC.	566	TOLEDO, OH	11/08/1997 - 10/04/2006
B	PAINWEBBER INCORPORATED	8174	WEEHAWKEN, NJ	03/08/1990 - 11/14/1997

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	7



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

Employment 1 of 1

Firm Name: **MCDONALD PARTNERS LLC**
Main Address: 1301 EAST 9TH STREET
SUITE 3700
CLEVELAND, OH 44114
Firm ID#: 135414

Regulator	Registration	Status	Date
B FINRA	General Securities Representative	Approved	09/15/2006
B FINRA	General Securities Sales Supervisor	Approved	09/15/2006
B FINRA	Investment Banking Representative	Approved	04/09/2010
B FINRA	Operations Professional	Approved	11/25/2011
B Alabama	Agent	Approved	02/15/2017
B Arizona	Agent	Approved	09/15/2006
B California	Agent	Approved	09/15/2006
IA California	Investment Adviser Representative	Approved	01/16/2020
B Colorado	Agent	Approved	05/10/2011
B Connecticut	Agent	Approved	11/28/2022
B District of Columbia	Agent	Approved	05/13/2014
B Florida	Agent	Approved	09/15/2006
B Georgia	Agent	Approved	09/22/2006



Qualifications

Regulator	Registration	Status	Date
B Idaho	Agent	Approved	08/20/2014
B Illinois	Agent	Approved	09/18/2006
B Indiana	Agent	Approved	11/27/2019
B Iowa	Agent	Approved	04/11/2007
B Maryland	Agent	Approved	12/10/2020
B Massachusetts	Agent	Approved	08/19/2016
B Michigan	Agent	Approved	09/15/2006
B Minnesota	Agent	Approved	04/30/2007
B Mississippi	Agent	Approved	02/04/2011
B Missouri	Agent	Approved	09/25/2014
B Montana	Agent	Approved	02/02/2007
B New Jersey	Agent	Approved	05/27/2008
B New Mexico	Agent	Approved	05/02/2019
B New York	Agent	Approved	10/13/2016
B North Carolina	Agent	Approved	09/15/2006
B Ohio	Agent	Approved	09/22/2006
IA Ohio	Investment Adviser Representative	Approved	09/25/2006
B Oregon	Agent	Approved	08/19/2016
B Pennsylvania	Agent	Approved	09/15/2006



Qualifications

Regulator	Registration	Status	Date
B South Carolina	Agent	Approved	11/04/2019
B Tennessee	Agent	Approved	09/15/2006
B Texas	Agent	Approved	09/20/2006
IA Texas	Investment Adviser Representative	Restricted Approval	12/01/2019
B Utah	Agent	Approved	03/26/2014
B Vermont	Agent	Approved	02/09/2007
B Virginia	Agent	Approved	01/20/2007
B Washington	Agent	Approved	09/25/2006
B West Virginia	Agent	Approved	09/15/2006
B Wyoming	Agent	Approved	01/06/2021

Branch Office Locations

MCDONALD PARTNERS LLC

One Seagate
Suite 1825
Toledo, OH 43604






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 3 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	01/02/2023
 General Securities Sales Supervisor - Options Module Examination (S9)	Series 9	01/02/2023
 General Securities Sales Supervisor Examination (Options Module & General Module) (S8)	Series 8	01/29/1998

General Industry/Product Exams

Exam	Category	Date
 Investment Banking Registered Representative Examination (S79TO)	Series 79TO	01/02/2023
 Operations Professional Examination (S99TO)	Series 99TO	01/02/2023
 Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
 Futures Managed Funds Examination (S31)	Series 31	07/01/2003
 General Securities Representative Examination (S7)	Series 7	07/15/1989

State Securities Law Exams

Exam	Category	Date
 Uniform Investment Adviser Law Examination (S65)	Series 65	07/26/1999
 Uniform Securities Agent State Law Examination (S63)	Series 63	07/27/1989



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	11/22/1999 - 10/04/2006	MCDONALD INVESTMENTS INC.	CRD# 566	TOLEDO, OH
B	11/08/1997 - 10/04/2006	MCDONALD INVESTMENTS INC.	CRD# 566	TOLEDO, OH
B	03/08/1990 - 11/14/1997	PAINWEBBER INCORPORATED	CRD# 8174	WEEHAWKEN, NJ
B	07/18/1989 - 03/21/1990	SHEARSON LEHMAN HUTTON INC.	CRD# 7506	NEW YORK, NY

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
09/2006 - Present	MCDONALD PARTNERS, LLC	REGISTERED REPRESENTATIVE	Y	Toledo, OH, 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.

GREATER TOLEDO COMMUNITY FOUNDATION - GRANTS COMMITTEE (volunteer);
 ARTS COMMISSION OF GREATER TOLEDO - HONORARY BOARD MEMBER (volunteer);
 MCCORD PROPERTIES - ACTIVE MEMBER;
 MANSOUR PROPERTIES - ACTIVE MEMBER;
 TOLEDO MUSEUM OF ART - BOARD MEMBER (volunteer);
 OHIO ARTS COUNCIL BOARD - MEMBER;
 Eden Rock Montenegro LLC (McDonald Partners private fund, investment-related) - Vice President;
 Signature Investments Montenegro d.o.o - Board Member; Umbrella Capital LLC (Investment-related) - Toledo, OH. LLC was created to make personal venture investments with family member. Start date: 6/25/2020, Number of hours per month: five (5), Number of hours during securities trading hours: zero (0); Ms. Mansour is a licensed insurance agent who sells life and health insurance with various insurance companies and receives standard commissions. She spends 12 hours per week on these activities.



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	7

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:	Regulator
Regulatory Action Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Sanction(s) Sought:	Cease and Desist
Date Initiated:	12/10/2021
Docket/Case Number:	3-20675
Employing firm when activity occurred which led to the regulatory action:	MCDONALD PARTNERS LLC
Product Type:	Other: private securities offerings

Allegations: The Securities and Exchange Commission ("Commission") deems it appropriate and in the public interest that public cease-and-desist proceedings be, and hereby are, instituted pursuant to Section 8A of the Securities Act of 1933 ("Securities Act") and Section 203(k) of the Investment Advisers Act of 1940 ("Advisers Act") against Rita Mansour ("Respondent"). The Commission finds that these proceedings arise out of Respondent's sales of securities in connection with private securities offerings conducted by two pooled investment vehicles that Respondent's employer advised (the "PIVs"). Those PIVs offered and sold securities to raise bridge funding for the construction of a resort in Montenegro. Investor monies raised through these offerings were to be used to purchase debt in a Montenegrin entity that was to construct the resort. Between September 2013 and continuing through January 2017, Respondent's employer offered and sold more than \$14 million in securities issued by the PIVs to investors located in the United States, including both its brokerage customers and its advisory clients. In October 2016, Respondent and Respondent's employer became aware of allegations that their point-person at the Montenegrin entity had misappropriated



\$488,331 of investor funds by misusing a debit card belonging to that entity to pay for certain personal expenses. After being confronted with the allegations that this individual had misappropriated funds from the Montenegrin entity, he conceded that he was not entitled to certain of the funds alleged to have been misappropriated. Accordingly, after negotiation, the individual agreed to repay approximately \$335,000 that he had allocated to personal expenses. Neither Respondent nor Respondent's employer disclosed the misappropriation to existing investors in October 2016. In early 2017, Respondent's employer then raised approximately \$1.5 million in additional funds through sales of securities issued by PIV2 to both existing security holders and new investors, including brokerage customers and advisory clients, without disclosing the misappropriation to those investors. Respondent was responsible for recommending and selling certain of these securities. By this conduct, Respondent caused her employer to violate Sections 17(a)(2) and (3) of the Securities Act and Sections 206(2) and 206(4) of the Advisers Act and Rule 206(4)-8 thereunder.

Current Status: Final

Resolution: Order

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? Yes

Resolution Date: 12/10/2021

Sanctions Ordered: Cease and Desist
Civil and Administrative Penalty(ies)/Fine(s)
Disgorgement
Monetary Penalty other than Fines

If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise? No

(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?



(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or

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

Monetary Sanction 1 of 3

Monetary Related Sanction: Disgorgement

Total Amount: \$22,968.75

Portion Levied against individual: \$22,968.75

Payment Plan:

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Monetary Sanction 2 of 3

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

Total Amount: \$40,000.00

Portion Levied against individual: \$40,000.00



Payment Plan:

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Monetary Sanction 3 of 3

Monetary Related Sanction: Monetary Penalty other than Fines

Total Amount: \$4,884.71

Portion Levied against individual: \$4,884.71

Payment Plan: Prejudgment interest on disgorgement

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Regulator Statement

Respondent has submitted an Offer of Settlement (the "Offer") which the Commission has determined to accept. As a result of the conduct described herein, Respondent caused her employer to violate Sections 17(a)(2) and (3) of the Securities Act and Sections 206(2) and 206(4) of the Advisers Act and Rule 206(4)-8 thereunder. Accordingly, it is hereby ordered that: Respondent cease and desist from committing or causing any violations and any future violations of Sections 17(a)(2) and (3) of the Securities Act, Sections 206(2) and 206(4) of the Advisers Act and Rule 206(4)-8 promulgated thereunder; and Respondent shall pay disgorgement of \$22,968.75, prejudgment interest of \$4,884.71 and civil penalties of \$40,000.00, to the Securities and Exchange Commission for transfer to the general fund of the United States Treasury.

Reporting Source: Individual

Regulatory Action Initiated By: UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Sanction(s) Sought: Cease and Desist
Civil and Administrative Penalty(ies)/Fine(s)
Disgorgement
Monetary Penalty other than Fines

Date Initiated: 12/10/2021

Docket/Case Number: 3-20675

Employing firm when activity occurred which led to the regulatory action: MCDONALD PARTNERS LLC

Product Type: Other: PRIVATE SECURITY

Allegations: This matter involves the alleged failure of Ms. Mansour to advise five clients of McDonald Partners LLC who in January 2017 purchased securities in private



offerings conducted by two limited liability companies ("PIVs") advised by McDonald Partners LLC of the misappropriation of funds by the point-person of the entity into which those PIVs invested funds, including the funds from those clients. As a result of this alleged non-disclosure, the SEC alleged that Ms. Mansour caused McDonald Partners LLC to violate Sections 17(a)(2) and (3) of the Securities Act and Sections 206(2) and 206(4) of the Advisers Act and Rule 206(4)-8 thereunder.

Current Status: Final

Resolution: Settled

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? Yes

Resolution Date: 12/10/2021

Sanctions Ordered: Cease and Desist
Civil and Administrative Penalty(ies)/Fine(s)
Disgorgement
Monetary Penalty other than Fines

Monetary Sanction 1 of 3

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

Total Amount: \$40,000.00

Portion Levied against individual: \$40,000.00

Payment Plan:

Is Payment Plan Current: Yes

Date Paid by individual: 12/21/2021

Was any portion of penalty waived? No

Amount Waived:

Monetary Sanction 2 of 3

Monetary Related Sanction: Monetary Penalty other than Fines

Total Amount: \$4,884.71

Portion Levied against individual: \$4,884.71

Payment Plan:

Is Payment Plan Current: Yes

Date Paid by individual: 12/21/2021

Was any portion of penalty waived? No

Amount Waived:

Monetary Sanction 3 of 3

Monetary Related Sanction: Disgorgement



Total Amount: \$22,968.75

Portion Levied against individual: \$22,968.75

Payment Plan:

Is Payment Plan Current: Yes

Date Paid by individual: 12/21/2021

Was any portion of penalty waived? No

Amount Waived:



Customer Dispute

This section provides information regarding a customer dispute that was reported to the Investment Adviser Registration Depository (IARD) by the Investment Adviser Representative (IAR), an investment adviser and/or securities firm, and/or a securities regulator. The event may include a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit that contains allegations of sales practice violations against the individual.

The customer dispute may be pending or may have resulted in a civil judgment, arbitration award, monetary settlement, closure without action, withdrawal, dismissal, denial, or other outcome.

Disclosure 1 of 7

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	MCDONALD PARTNERS LLC
Allegations:	Client alleges that RR recommended unsuitable investments, made misrepresentations, and did not accurately disclose all material facts, in connection with the Claimant's 2013 investment in a private offering of securities and 2020 investment in a high-yield debt instrument.
Product Type:	Debt-Corporate Other: Private Placement.
Alleged Damages:	\$345,000.00
Alleged Damages Amount Explanation (if amount not exact):	\$345,000 in out-of-pocket compensatory damages, as well as lost opportunity costs, model portfolio damages, prejudgment interest, punitive damages, and additional damages to the extent the FINRA Arbitration Panel may deem appropriate.

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA Dispute Resolution
Docket/Case #:	25-00965
Date Notice/Process Served:	05/14/2025
Arbitration Pending?	Yes
Broker Statement	I believe all allegations are baseless and lack merit. I deny that I did not accurately disclose all material facts in connection with the Claimant's 2013 and 2020 investments at issue. I accurately disclosed all material facts and did not omit to disclose any material facts to Claimant, who was provided a Private Placement Memorandum and Subscription Documents in connection with his 2013 investment in a private offering of securities, and was provided a Prospectus in connection with his 2020 investment in L Bonds, prior to purchasing those investments. I recommended only suitable investments to Claimant based on his stated risk tolerance and investment objectives. I conducted reasonable due diligence on both recommended investments, which were both approved by my firm.

Disclosure 2 of 7

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	MCDONALD PARTNERS LLC
Allegations:	Claimant alleges that RR did not diversify his account, recommended unsuitable



investments, and did not accurately disclose information regarding recommended investments.

Product Type: Debt-Asset Backed
Debt-Corporate

Alleged Damages: \$100,000.00

Alleged Damages Amount Explanation (if amount not exact): Claimant demands \$100,000 in damages plus punitive and additional damages and relief as may be shown at hearing.

Is this an oral complaint? No

Is this a written complaint? Yes

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

Arbitration/Reparation forum or court name and location: FINRA

Docket/Case #: 24-00661

Filing date of arbitration/CFTC reparation or civil litigation: 03/22/2024

Customer Complaint Information

Date Complaint Received: 04/03/2024

Complaint Pending? No

Status: Settled

Status Date: 06/24/2024

Settlement Amount: \$60,000.00

Individual Contribution Amount: \$0.00

Broker Statement

I believe the allegations lack merit. Based on my recommendations, Claimant's account was appropriately diversified among equities, fixed income securities, alternative investments, and cash. I conducted reasonable due diligence on each recommended investment, all of which were approved by my firm. I recommended only suitable investments to Claimant. I did not misrepresent or omit to disclose any material facts to Claimant who was provided with a fact sheet and prospectus on the subject investments prior to purchasing them.

I did not contribute to, and was not asked to contribute to, the settlement.

Disclosure 3 of 7

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: MCDONALD PARTNERS LLC

Allegations: Claimant alleges that RR recommended an unsuitable investment in a private offering of securities in 2013 and 2014. Claimant further alleges RR did not disclose, and did not accurately disclose, all material facts in connection with Claimant's investments in the private placement offering, and did not provide updates and other documents after Claimant made the investments.



Product Type: Direct Investment-DPP & LP Interests
Other: Private Securities Offering

Alleged Damages: \$150,000.00

Alleged Damages Amount Explanation (if amount not exact): Claimant demands an arbitrary dollar amount of \$425,900 based on his principal investment of \$150,000 plus "10 years Annualized [at] 11%."

Arbitration Information

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

Docket/Case #: 24-00406

Date Notice/Process Served: 02/29/2024

Arbitration Pending? Yes

Broker Statement I deny the allegations that I did not disclose, and did not accurately disclose, all material facts in connection with claimant's investment in a private placement offering, and did not provide updates and other documents after claimant made the investment. I accurately disclosed all material facts to the claimant, who was an experienced investor, including through the Private Placement Memorandum as well as the Subscription Document executed by the claimant to make the investment. Periodic updates were provided to investors by the Manager.

Disclosure 4 of 7

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: MCDONALD PARTNERS LLC

Allegations: Customer alleges that RR did not accurately disclose all material facts in connection with its 2014 and 2015 investments in a private offering of securities.

Product Type: Other: Private Placement

Alleged Damages: \$500,000.00

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: 02/24/2022

Complaint Pending? No

Status: Settled

Status Date: 03/14/2023

Settlement Amount: \$262,500.00

Individual Contribution Amount: \$0.00

Broker Statement I deny the allegation that I did not accurately disclose all material facts in



connection with claimant's 2014 and 2015 investments in a private offering of securities. I accurately disclosed all material facts to the principals of the claimant, who were sophisticated and experienced investors, including through the Private Placement Memorandum as well as the Subscription Documents executed by the principals to make the investments. The Firm elected to settle the disputed claims to avoid the costs and risks associated with litigation. I did not personally contribute to the settlement.

Disclosure 5 of 7

Reporting Source: Regulator

Employing firm when activities occurred which led to the complaint: McDonald Partners, LLC

Allegations: Mansour was a subject of the customer's complaint against her member firm and another named respondent that asserted the following causes of action: violations of the Ohio Securities Act; negligence; breach of contract; breach of fiduciary duty; and fraud.

Product Type: Other: Unspecified Securities

Alleged Damages: \$550,580.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: [FINRA - CASE #19-00440](#)

Date Notice/Process Served: 02/08/2019

Arbitration Pending? No

Disposition: Award

Disposition Date: 10/12/2021

Disposition Detail: Mansour was a Subject Of the customer's complaint alleging Mansour and her member firm and another named respondent caused sales practice violations. The named respondents are jointly and severally liable for and shall pay to a Claimant the sum of \$160,000 in compensatory damages.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: McDonald Partners LLC

Allegations: Claimants allege that RR recommended unsuitable investments in a private offering of securities, and did not accurately disclose the risks of, and other material facts regarding, the investments. One of the Claimants also alleges that RR recommended unsuitable investments in multiple other private offerings of securities.

Product Type: Direct Investment-DPP & LP Interests
Other: Private Securities Offering

Alleged Damages: \$650,000.00

Alleged Damages Amount Explanation (if amount not exact): Claimants seek compensatory damages of approximately \$650,000.



Is this an oral complaint? No
Is this a written complaint? Yes
Is this an arbitration/CFTC reparation or civil litigation? Yes
Arbitration/Reparation forum or court name and location: FINRA Arbitration
Docket/Case #: 19-00440
Filing date of arbitration/CFTC reparation or civil litigation: 10/09/2020

Customer Complaint Information

Date Complaint Received: 10/09/2020
Complaint Pending? No
Status: Arbitration Award/Monetary Judgment (for claimants/plaintiffs)
Status Date: 10/12/2021
Settlement Amount: \$225,000.00
Individual Contribution Amount: \$0.00

Broker Statement The Firm elected to settle the disputed claims with two of the Claimants, a married couple, to avoid the costs and risks associated with further litigating the case. I did not personally contribute to the settlement.

Disclosure 6 of 7

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

Allegations: Claimant alleges Ms. Mansour did not disclose, and did not accurately disclose, all material facts in connection with Claimant's investment in a private placement offering, and did not provide updates and other documents after Claimant made the investment.

Product Type: Direct Investment-DPP & LP Interests
Other: Private Securities Offering

Alleged Damages: \$250,000.00

Alleged Damages Amount Explanation (if amount not exact): Claimant seeks compensatory damages of approximately \$250,000.

Is this an oral complaint? No
Is this a written complaint? Yes
Is this an arbitration/CFTC reparation or civil litigation? Yes
Arbitration/Reparation forum or court name and location: FINRA Arbitration



Docket/Case #: 20-03621

Filing date of arbitration/CFTC reparation or civil litigation: 10/23/2020

Customer Complaint Information

Date Complaint Received: 10/31/2020

Complaint Pending? No

Status: Evolved into Arbitration/CFTC reparation (the individual is a named party)

Status Date: 10/31/2020

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

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

Docket/Case #: 20-03621

Date Notice/Process Served: 10/31/2020

Arbitration Pending? No

Disposition: Settled

Disposition Date: 05/09/2022

Monetary Compensation Amount: \$175,000.00

Individual Contribution Amount: \$0.00

Broker Statement

I deny the allegations that I did not disclose, and did not accurately disclose, all material facts in connection with claimant's investment in a private placement offering, and did not provide updates and other documents after claimant made the investment. I accurately disclosed all material facts to the claimant, who was a sophisticated and experienced investor, including through the Private Placement Memorandum as well as the Subscription Document executed by the claimant to make the investment. Periodic updates were provided to investors by the Manager. The Firm elected to settle the disputed claims with the claimant to avoid the costs and risks associated with further litigating the case. I did not personally contribute to the settlement nor was I asked to do so.

Disclosure 7 of 7

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: McDonald Partners LLC

Allegations: Claimants allege Ms. Mansour did not provide sufficient information regarding source of funds raised for, and used to close, contingency offering, and did not provide accurate information regarding status of underlying project.

Product Type: Other: Private Securities Offering



Alleged Damages: \$250,000.00
Alleged Damages Amount Explanation (if amount not exact): Claimant seeks compensatory damages of approximately \$250,000

Arbitration Information

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

Docket/Case #: 19-02756

Date Notice/Process Served: 09/30/2019

Arbitration Pending? No

Disposition: Settled

Disposition Date: 12/10/2020

Monetary Compensation Amount: \$82,500.00

Individual Contribution Amount: \$0.00

Broker Statement I deny the allegations that I did not provide sufficient information regarding source of funds raised for, and used to close, a contingency offering, and that I did not provide accurate information regarding the status of the underlying project. I accurately disclosed all material facts to the claimant, including through the Private Placement Memorandum as well as the Subscription Document executed by the claimant to make the investment. Periodic updates were provided to investors by the Manager. The Firm elected to settle the disputed claims with the claimant to avoid the costs and risks associated with further litigating the case. I did not personally contribute to the settlement nor was I asked to do so.



End of Report

This page is intentionally left blank.