



## IAPD Report

# SEAN PLACIDO RODRIGUEZ

CRD# 2001875

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Please contact FINRA with any concerns.



## **IAPD Information About Representatives**

IAPD offers information on all current-and many former representatives. Investors are strongly encouraged to use IAPD to check the background of representatives before deciding to conduct, or continue to conduct, business with them.

### **What is included in a IAPD report?**

IAPD reports for individual representatives include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards.

It is important to note that the information contained in an IAPD report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

### **Where did this information come from?**

The information contained in IAPD comes from the Investment Adviser Registration Depository (IARD) and FINRA's Central Registration Depository, or CRD, (see more on CRD below) and is a combination of:

- information the states require representatives and firms to submit as part of the registration and licensing process, and
- information that state regulators report regarding disciplinary actions or allegations against representatives.

### **How current is this information?**

Generally, representatives are required to update their professional and disciplinary information in IARD within 30 days.

### **Need help interpreting this report?**

For help understanding how to read this report, please consult NASAA's IAPD Tips page <http://www.nasaa.org/IAPD/IARReports.cfm>

### **What if I want to check the background of an Individual Broker or Brokerage Firm?**

To check the background of an Individual Broker or Brokerage firm, you can search for the firm or individual in IAPD. If your search is successful, click on the link provided to view the available licensing and registration information in FINRA's BrokerCheck website.

### **Are there other resources I can use to check the background of investment professionals?**

It is recommended that you learn as much as possible about an individual representative or Investment Adviser firm before deciding to work with them. Your state securities regulator can help you research individuals and certain firms doing business in your state. The contact information for state securities regulators can be found on the website of the North American Securities Administrators Association <http://www.nasaa.org>



## Report Summary

### SEAN PLACIDO RODRIGUEZ (CRD# 2001875)

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 **02/05/2026**.

### CURRENT EMPLOYERS

|    | Firm                           | CRD#       | Registered Since |
|----|--------------------------------|------------|------------------|
| B  | VALIC FINANCIAL ADVISORS, INC. | CRD# 42803 | 07/28/2011       |
| IA | VALIC FINANCIAL ADVISORS, INC. | CRD# 42803 | 08/10/2011       |

### QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **8** 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 | LPL FINANCIAL CORPORATION      | 6413 | LOS ANGELES, CA | 05/12/2009 - 07/12/2010 |
| B  | LPL FINANCIAL CORPORATION      | 6413 | LOS ANGELES, CA | 05/08/2009 - 07/12/2010 |
| IA | WEDBUSH MORGAN SECURITIES INC. | 877  | LOS ANGELES, CA | 06/01/2006 - 05/21/2009 |

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

### DISCLOSURE INFORMATION

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

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

The following types of events are disclosed about this representative:

| Type             | Count |
|------------------|-------|
| Regulatory Event | 2     |
| Customer Dispute | 2     |
| 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 **8** jurisdiction(s) and 1 SRO(s) through his or her employer(s).

### Employment 1 of 1

Firm Name: **VALIC FINANCIAL ADVISORS, INC.**

Main Address: 2919 ALLEN PKWY  
HOUSTON, TX 77019

Firm ID#: 42803

|           | Regulator  | Registration                        | Status   | Date       |
|-----------|------------|-------------------------------------|----------|------------|
| <b>B</b>  | FINRA      | General Securities Representative   | Approved | 07/28/2011 |
| <b>B</b>  | FINRA      | General Securities Sales Supervisor | Approved | 07/28/2011 |
| <b>B</b>  | Arizona    | Agent                               | Approved | 05/27/2020 |
| <b>IA</b> | Arizona    | Investment Adviser Representative   | Approved | 05/27/2020 |
| <b>B</b>  | California | Agent                               | Approved | 07/28/2011 |
| <b>IA</b> | California | Investment Adviser Representative   | Approved | 08/10/2011 |
| <b>B</b>  | Florida    | Agent                               | Approved | 06/19/2020 |
| <b>IA</b> | Florida    | Investment Adviser Representative   | Approved | 06/19/2020 |
| <b>B</b>  | Hawaii     | Agent                               | Approved | 11/12/2025 |
| <b>IA</b> | Hawaii     | Investment Adviser Representative   | Approved | 11/12/2025 |
| <b>B</b>  | Maryland   | Agent                               | Approved | 09/15/2021 |
| <b>B</b>  | New York   | Agent                               | Approved | 06/09/2015 |
| <b>B</b>  | Texas      | Agent                               | Approved | 02/08/2024 |



## Qualifications

|    | Regulator | Registration                      | Status              | Date       |
|----|-----------|-----------------------------------|---------------------|------------|
| IA | Texas     | Investment Adviser Representative | Restricted Approval | 02/07/2024 |
| B  | Vermont   | Agent                             | Approved            | 02/05/2026 |
| IA | Vermont   | Investment Adviser Representative | Approved            | 02/05/2026 |

## Branch Office Locations

**VALIC FINANCIAL ADVISORS, INC.**  
450 NORTH BRAND BLVD.  
SUITE 600  
Glendale, CA 91203



## 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, 2 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 | 11/08/2000 |
|  | General Securities Sales Supervisor - Options Module Examination (S9)  | Series 9  | 11/06/2000 |

#### General Industry/Product Exams

|                                                                                     | Exam                                               | Category | Date       |
|-------------------------------------------------------------------------------------|----------------------------------------------------|----------|------------|
|  | Securities Industry Essentials Examination (SIE)   | SIE      | 10/01/2018 |
|  | General Securities Representative Examination (S7) | Series 7 | 10/21/1989 |

#### State Securities Law Exams

|                                                                                     | Exam                                                 | Category  | Date       |
|-------------------------------------------------------------------------------------|------------------------------------------------------|-----------|------------|
|  | Uniform Investment Adviser Law Examination (S65)     | Series 65 | 02/19/2002 |
|  | Uniform Securities Agent State Law Examination (S63) | Series 63 | 04/10/1991 |

### PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **0** professional designation(s).

No information reported.

Only professional designations listed in Question 8 of the Form U4 will appear in this section if the appropriate box is checked and verified by the issuing organization at the time of the filing. Learn more about eligible designations at [IARD](#) and [NASAA](#).



## 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 | 05/12/2009 - 07/12/2010 | LPL FINANCIAL CORPORATION                | CRD# 6413 | LOS ANGELES, CA |
| B  | 05/08/2009 - 07/12/2010 | LPL FINANCIAL CORPORATION                | CRD# 6413 | LOS ANGELES, CA |
| IA | 06/01/2006 - 05/21/2009 | WEDBUSH MORGAN SECURITIES INC.           | CRD# 877  | LOS ANGELES, CA |
| B  | 07/30/1997 - 05/21/2009 | WEDBUSH MORGAN SECURITIES INC.           | CRD# 877  | LOS ANGELES, CA |
| B  | 02/13/1995 - 08/01/1997 | SMITH BARNEY INC.                        | CRD# 7059 | NEW YORK, NY    |
| B  | 04/02/1991 - 03/03/1995 | PRUDENTIAL SECURITIES INCORPORATED       | CRD# 7471 | NEW YORK, NY    |
| B  | 10/25/1989 - 04/10/1991 | AMERICAN EXPRESS FINANCIAL ADVISORS INC. | CRD# 6363 | MINNEAPOLIS, MN |
| B  | 10/25/1989 - 04/10/1991 | IDS LIFE INSURANCE COMPANY               | CRD# 6321 | MINNEAPOLIS, MN |

### 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           |
|-------------------|--------------------------------|---------------------------|--------------------|-----------------------------|
| 12/2022 - Present | AGIA                           | Agent                     | N                  | Houston, TX, United States  |
| 07/2011 - Present | VALIC FINANCIAL ADVISORS, INC. | REGISTERED REPRESENTATIVE | Y                  | GLENDALE, CA, 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.

AGIA

POSITION: Agent NATURE: null INVESTMENT RELATED: No NUMBER OF HOURS: 10 SECURITIES TRADING HOURS: 1  
START DATE: 12/17/2022

ADDRESS: 2929 Allen Parkway, Houston TX 77019, United States

DESCRIPTION: Non-Securities Insurance Products



## Disclosure Summary

### Disclosure Information

**What you should know about reported disclosure events:**

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

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

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

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

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

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

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





## DISCLOSURE EVENT DETAILS

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

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

The following types of events are disclosed about this representative:

| Type             | Count |
|------------------|-------|
| Regulatory Event | 2     |
| Customer Dispute | 2     |
| Termination      | 1     |

### Regulatory Event

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

#### Disclosure 1 of 2

|                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Reporting Source:</b>                                                         | Individual                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Regulatory Action Initiated By:</b>                                           | CALIFORNIA DEPARTMENT OF INSURANCE                                                                                                                                                                                                                                                                                                                                                           |
| <b>Sanction(s) Sought:</b>                                                       | Revocation<br>Other: ISSUANCE OF RESTRICTED LICENSE                                                                                                                                                                                                                                                                                                                                          |
| <b>Date Initiated:</b>                                                           | 11/22/2013                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Docket/Case Number:</b>                                                       | FILE NO. LCB 1159-A                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Employing firm when activity occurred which led to the regulatory action:</b> | VALIC FINANCIAL ADVISORS                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Product Type:</b>                                                             | Insurance                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Allegations:</b>                                                              | AS A RESULT OF A SETTLEMENT BETWEEN FINRA AND MYSELF ON DECEMBER 22, 2012, I WAS UNAWARE THAT I HAD TO DISCLOSE SUCH ACTIONS TO THE CALIFORNIA DEPT OF INSURANCE. AS A RESULT, AFTER SUBMITTING MY RENEWAL APPLICATION, I WAS ADVISED BY THE CDI THAT I FAILED TO DISCLOSE THE FINRA SETTLEMENT WITHIN 30 DAYS PER CALIFORNIA INSURANCE CODE SECTIONS 1729.2(A), 1729.2(C)(2) AND 1729.2(D). |
| <b>Current Status:</b>                                                           | Final                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Resolution:</b>                                                               | 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:**

11/22/2013

**Sanctions Ordered:**

Revocation

Other: CALIFORNIA INSURANCE LICENSE WAS REVOKED, PROVIDED THAT A RESTRICTED LICENSE BE ISSUED.

**Broker Statement**

I WAS UNAWARE THAT I WAS REQUIRED TO DISCLOSE MY FINRA SETTLEMENT DATED DECEMBER 2012 TO THE CALIFORNIA DEPARTMENT OF INSURANCE (CDI). I CALLED CDI PRIOR TO SUBMITTING MY RENEWAL APPLICATION, HOWEVER WAS GIVEN INCORRECT INFORMATION AS I WAS TOLD THAT I DID NOT HAVE TO DISCLOSE THE FINRA MATTER ON MY RENEWAL APPLICATION. SUBSEQUENTLY, CDI ISSUED THIS ORDER AS A RESULT OF NOT DISCLOSING MY FINRA SETTLEMENT WITHIN 30 DAYS PER CODE.

## Disclosure 2 of 2

**Reporting Source:**

Regulator

**Regulatory Action Initiated By:**

FINRA

**Sanction(s) Sought:**

Other: N/A

**Date Initiated:**

12/18/2012

**Docket/Case Number:**

[2010023804801](#)

**Employing firm when activity occurred which led to the regulatory action:**

WEDBUSH SECURITIES, INC.

**Product Type:**

Other: UNSPECIFIED SHORT TERM EQUITY SECURITIES

**Allegations:**

FINRA RULE 2010, NASD RULES 2110, 2310, 2510(B): RODRIGUEZ EXECUTED OR CAUSED THE EXECUTION OF NUMEROUS DISCRETIONARY TRANSACTIONS IN A CUSTOMER'S ACCOUNT AND HE EXERCISED DISCRETION IN THE CUSTOMER'S ACCOUNT WITHOUT OBTAINING THE CUSTOMER'S WRITTEN AUTHORIZATION TO EXERCISE DISCRETION OR HIS MEMBER FIRM'S WRITTEN ACCEPTANCE OF THE ACCOUNT AS DISCRETIONARY. RODRIGUEZ RECOMMENDED UNSUITABLE INVESTMENTS TO THE CUSTOMER. RODRIGUEZ RECOMMENDED AND EXECUTED SEVERAL EQUITY PURCHASES AND SALES WITH A SHORT TERM HOLDING PERIOD AND CAUSED THE CUSTOMER'S ACCOUNT TO BE UNDULY CONCENTRATED IN SOME EQUITY POSITIONS. RODRIGUEZ RECOMMENDED TO THE CUSTOMER THE PURCHASE AND SALE OF THESE EQUITY SECURITIES IN AMOUNTS THAT RESULTED IN UNDUE CONCENTRATION OF THESE SECURITIES IN HER ACCOUNT, RANGING BETWEEN 25 PERCENT AND 50 PERCENT OF HER ACCOUNT VALUE AT THE TIME OF THE TRANSACTIONS. IN LIGHT OF THE CUSTOMER'S FINANCIAL SITUATION AND NEEDS, RODRIGUEZ DID NOT HAVE A REASONABLE BASIS TO RECOMMEND THAT SHE ENGAGE IN SHORT-TERM TRADING AND CONCENTRATE HER ACCOUNT IN THE EQUITY SECURITIES.

**Current Status:**

Final



|                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| <b>Resolution:</b>                                                                                                                                                                                                                                                                                                                                                                                                            | Acceptance, Waiver & Consent(AWC)                                          |
| <b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>                                                                                                                                                                                                                                                                   | No                                                                         |
| <b>Resolution Date:</b>                                                                                                                                                                                                                                                                                                                                                                                                       | 12/18/2012                                                                 |
| <b>Sanctions Ordered:</b>                                                                                                                                                                                                                                                                                                                                                                                                     | Civil and Administrative Penalty(ies)/Fine(s)<br>Restitution<br>Suspension |
| <b>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?</b>                                                                                                                                                                                                                                                                                       | No                                                                         |
| <b>(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?</b> |                                                                            |
| <b>(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</b>  |                                                                            |



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

**Sanction 1 of 1**

|                             |                |
|-----------------------------|----------------|
| <b>Sanction Type:</b>       | Suspension     |
| <b>Capacities Affected:</b> | ALL CAPACITIES |
| <b>Duration:</b>            | 60 DAYS        |
| <b>Start Date:</b>          | 01/22/2013     |
| <b>End Date:</b>            | 03/22/2013     |

**Monetary Sanction 1 of 2**

|                                           |                                               |
|-------------------------------------------|-----------------------------------------------|
| <b>Monetary Related Sanction:</b>         | Civil and Administrative Penalty(ies)/Fine(s) |
| <b>Total Amount:</b>                      | \$10,000.00                                   |
| <b>Portion Levied against individual:</b> | \$10,000.00                                   |
| <b>Payment Plan:</b>                      |                                               |
| <b>Is Payment Plan Current:</b>           |                                               |
| <b>Date Paid by individual:</b>           | 05/02/2014                                    |
| <b>Was any portion of penalty waived?</b> | No                                            |

**Amount Waived:****Monetary Sanction 2 of 2**

|                                           |             |
|-------------------------------------------|-------------|
| <b>Monetary Related Sanction:</b>         | Restitution |
| <b>Total Amount:</b>                      | \$5,000.00  |
| <b>Portion Levied against individual:</b> | \$5,000.00  |
| <b>Payment Plan:</b>                      |             |
| <b>Is Payment Plan Current:</b>           |             |
| <b>Date Paid by individual:</b>           |             |
| <b>Was any portion of penalty waived?</b> | No          |

**Amount Waived:****Regulator Statement**

WITHOUT ADMITTING OR DENYING THE FINDINGS, RODRIGUEZ CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE HE IS FINED \$10,000, SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ALL CAPACITIES FOR 60 DAYS, AND ORDERED TO DISGORGE ILL-GOTTEN GAINS IN PARTIAL RESTITUTION IN THE TOTAL AMOUNT OF \$5,000, PLUS INTEREST, TO A CUSTOMER. THE SUSPENSION IS IN EFFECT FROM JANUARY 22, 2013, THROUGH MARCH 22, 2013.

RODRIGUEZ SHALL SUBMIT SATISFACTORY PROOF OF PAYMENT OF RESTITUTION OR OF REASONABLE AND DOCUMENTED EFFORTS UNDERTAKEN TO EFFECT RESTITUTION. SUCH PROOF SHALL BE SUBMITTED TO FINRA NO LATER THAN 120 DAY AFTER ACCEPTANCE OF THE AWC. IF FOR ANY REASON RESPONDENT CANNOT LOCATE THE CUSTOMER AFTER REASONABLE AND DOCUMENTED EFFORTS WITHIN 120 DAYS FROM THE DATE THE AWC IS ACCEPTED, OR SUCH ADDITIONAL PERIOD AGREED TO BY FINRA IN WRITING, RESPONDENT SHALL FORWARD ANY UNDISTRIBUTED RESTITUTION AND INTEREST TO THE APPROPRIATE ESCHER, UNCLAIMED PROPERTY OR ABANDONED PROPERTY FUND FOR THE STATE IN WHICH THE CUSTOMER IS LAST KNOWN TO HAVE RESIDED. RESPONDENT SHALL PROVIDE SATISFACTORY PROOF OF SUCH ACTION TO FINRA WITHIN 14 DAYS OF FORWARDING THE UNDISTRIBUTED RESTITUTION AND INTEREST TO THE APPROPRIATE STATE AUTHORITY. FINE PAID IN FULL ON MAY 2, 2014.

.....

**Reporting Source:** Individual

**Regulatory Action Initiated By:** FINRA

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

**Date Initiated:** 12/20/2012

**Docket/Case Number:** 2010023804801

**Employing firm when activity occurred which led to the regulatory action:** WEDBUSH MORGAN SECURITIES

**Product Type:** Equity-OTC  
Equity Listed (Common & Preferred Stock)  
Mutual Fund  
Options

**Allegations:** CLIENT ALLEGED THAT UNSUITABLE RECOMMENDATIONS WERE MADE AND EXERCISE OF DISCRETION WITHOUT WRITTEN AUTHORIZATION.

**Current Status:** Final

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

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



**Resolution Date:** 12/20/2012

**Sanctions Ordered:** Disgorgement  
Suspension

**Sanction 1 of 1**

**Sanction Type:** Suspension

**Capacities Affected:** ALL CAPACITIES

**Duration:** 60 DAYS

**Start Date:** 01/22/2013

**End Date:** 03/22/2013

**Monetary Sanction 1 of 2**

**Monetary Related Sanction:** Disgorgement

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

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

**Payment Plan:** 500.00 MONTHLY

**Is Payment Plan Current:** Yes

**Date Paid by individual:** 12/28/2012

**Was any portion of penalty waived?** No

**Amount Waived:**

**Monetary Sanction 2 of 2**

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

**Total Amount:** \$10,000.00

**Portion Levied against individual:** \$10,000.00

**Payment Plan:** MONTHLY PAYMENTS OF \$500.00

**Is Payment Plan Current:** Yes

**Date Paid by individual:** 12/28/2012

**Was any portion of penalty waived?** No

**Amount Waived:**



## Customer Dispute

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

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

### Disclosure 1 of 2

|                                                                            |                                                                                                                                                                          |
|----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Reporting Source:</b>                                                   | Individual                                                                                                                                                               |
| <b>Employing firm when activities occurred which led to the complaint:</b> | WEDBUSH MORGAN SECURITIES                                                                                                                                                |
| <b>Allegations:</b>                                                        | (08/2004 TO 11/2008) - CLIENT ALLEGED THAT INVESTMENT RECOMMENDATIONS WERE UNSUITABLE, UNAUTHORIZED AND OVERUSE OF MARGIN RESULTED IN ACCOUNT VALUE TO DECLINE IN VALUE. |
| <b>Product Type:</b>                                                       | Equity-OTC<br>Equity Listed (Common & Preferred Stock)<br>Mutual Fund                                                                                                    |
| <b>Alleged Damages:</b>                                                    | \$950,000.00                                                                                                                                                             |
| <b>Alleged Damages Amount Explanation (if amount not exact):</b>           | THE CLIENT REQUESTED DAMAGES FAR BEYOND THE VALUE OF HIS ACCOUNT, INCLUDING LOSSES HE INCURRED IN A REAL ESTATE TRANSACTION.                                             |
| <b>Is this an oral complaint?</b>                                          | No                                                                                                                                                                       |
| <b>Is this a written complaint?</b>                                        | Yes                                                                                                                                                                      |
| <b>Is this an arbitration/CFTC reparation or civil litigation?</b>         | No                                                                                                                                                                       |

## Customer Complaint Information

|                                        |              |
|----------------------------------------|--------------|
| <b>Date Complaint Received:</b>        | 11/26/2008   |
| <b>Complaint Pending?</b>              | No           |
| <b>Status:</b>                         | Settled      |
| <b>Status Date:</b>                    | 03/26/2009   |
| <b>Settlement Amount:</b>              | \$312,000.00 |
| <b>Individual Contribution Amount:</b> | \$0.00       |

|                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Broker Statement</b> | THIS MATTER WAS FILED BY A LONG STANDING CLIENT RELATIONSHIP WHOSE ACCOUNT SUFFERED LOSSES DUE TO THE FINANCIAL CRISIS OF THE 2008. DURING THE TIME I MANAGED [CUSTOMER'S] ACCOUNT, THERE ARE NUMEROUS DOCUMENTED COMMUNICATIONS FROM HIM STATING HOW HAPPY HE WAS WITH THE LEVEL OF SERVICE AND PERFORMANCE OF THE ACCOUNT. UNFORTUNATELY, THE INVESTMENT STRATEGY AND USE OF MARGIN DURING THE SIGNIFICANT DELINE OF THE FINANCIAL CRISIS RESULTED IN LOSSES IN THE ACCOUNT. HIS ALLEGED COMPLAINTS I FEEL WERE UNJUSTIFIED AND IT WAS MY OPINION THAT THE MATTER BE ARBITRATED. HOWEVER, AGAINST MY WISHES AND BEST INTEREST, WEDBUSH MORGAN DECIDED TO MEDIATE AND SETTLE THE MATTER FOR REASONS BENEFICIAL TO THEM AS A FIRM. |
|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**Disclosure 2 of 2**

**Reporting Source:** Individual

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

**Allegations:** (4/15/2007 - 3/25/2009) CHURNING/EXCESSIVE TRADING; UNSUITABILITY;

**Product Type:** Equity-OTC  
Equity Listed (Common & Preferred Stock)  
Mutual Fund

**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:** 08/24/2010

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 12/20/2012

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

**Individual Contribution Amount:** \$5,000.00

**Broker Statement** THIS CLIENT COMPLAINT WAS SETTLED WITHOUT ADMITTING OR DENYING THE FINDINGS THROUGH A FINRA ACCEPTANCE, WAIVER AND CONSENT (AWC) RESOLUTION. THE CORRESPONDING DOCKET/CASE NUMBER IS: 2010023804801.





## 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:** Individual

**Firm Name:** SALOMON SMITH BARNEY INC.

**Termination Type:** Discharged

**Termination Date:** 07/22/1997

**Allegations:** N/A  
I WAS ACCUSED OF VIOLATING THE FIRM`S POLICY  
OF SENDING UNAUTHORIZED MAIL TO MY CLIENTS.

**Product Type:**

**Other Product Types:**

**Broker Statement**

TERMINATION OF EMPLOYMENT FROM SMITH BARNEY.  
I SENT OUT `THANK YOU` CARDS TO (2) OF MY CLIENTS  
USING PERSONAL POSTAGE & DID NOT RUN THE CARDS THROUGH THE  
OFFICE POSTAGE METER, NOR DID I GET PRE-APPROVAL TO DO SO. IN  
SALES CONFERENCES THAT I ATTENDED, I WAS TOLD THE INDIVIDUAL  
STAMPS ON THANK YOU CARDS, BIRTHDAY CARDS, ETC., WAS MORE  
APPROPRIATE AND PROFESSIONAL THAN USING THE OFFICE POSTAGE  
METER. I WAS ALSO UNDER THE IMPRESSION THAT THIS WAS A WIDELY  
ACCEPTED PRACTICE IN OUR INDUSTRY, SINCE IN NO WAY SHAPE OR  
FORM WAS THE INFORMATION INVESTMENT RELATED. HOWEVER, DUE TO  
THIS `POLICY VIOLATION` I WAS TERMINATED.



## End of Report

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