



IAPD Report

JOHN CLAYBOURN FRAKES

CRD# 2045294

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Qualifications	2 - 4
Registration and Employment History	5 - 6
Disclosure Information	7



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

JOHN CLAYBOURN FRAKES (CRD# 2045294)

The report summary provides an overview of the representative's professional background and conduct. The information contained in this report has been provided by the representative, investment adviser and/or securities firms, and/or securities regulators as part of the states' investment adviser registration and licensing process. The information contained in this report was last updated by the representative, a previous employing firm, or a securities regulator on **12/02/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	SANCTUARY SECURITIES, INC.	CRD# 205	09/18/2020
IA	SANCTUARY ADVISORS, LLC	CRD# 226606	09/18/2020

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **5** jurisdiction(s).

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

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

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

REGISTRATION HISTORY

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

	FIRM	CRD#	LOCATION	REGISTRATION DATES
B	UBS FINANCIAL SERVICES INC.	8174	SAN ANTONIO, TX	01/16/2009 - 09/29/2020
IA	UBS FINANCIAL SERVICES INC.	8174	SAN ANTONIO, TX	01/16/2009 - 09/29/2020
B	CITIGROUP GLOBAL MARKETS INC.	7059	SAN ANTONIO, TX	07/31/1993 - 02/05/2009

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

Employment 1 of 2

Firm Name: **SANCTUARY SECURITIES, INC.**
Main Address: 1450 BRICKELL AVENUE
SUITE 2610
MIAMI, FL 33131
Firm ID#: 205

Regulator	Registration	Status	Date
B FINRA	Direct Participation Programs	Approved	09/18/2020
B FINRA	General Securities Representative	Approved	09/18/2020
B California	Agent	Approved	09/18/2020
B Colorado	Agent	Approved	09/21/2020
B New Mexico	Agent	Approved	09/21/2020
B New York	Agent	Approved	12/02/2025
B Texas	Agent	Approved	09/18/2020

Branch Office Locations

DAVID A. NOYES & COMPANY
1027 Austin Hwy STE 101
San Antonio, TX 78209

DAVID A. NOYES & COMPANY
1027 AUSTIN HIGHWAY | SUITE 101
San Antonio, TX 78209

Employment 2 of 2

Firm Name: **SANCTUARY ADVISORS, LLC**
Main Address: 1450 BRICKELL AVENUE
SUITE 2610
MIAMI, FL 33131
Firm ID#: 226606



Qualifications

Regulator	Registration	Status	Date
IA Texas	Investment Adviser Representative	Approved	09/18/2020

Branch Office Locations

SANCTUARY ADVISORS, LLC
1027 Austin Hwy STE 101
San Antonio, TX 78209



Qualifications

PASSED INDUSTRY EXAMS

This section includes all industry exams that the representative has passed. Under limited circumstances, a representative may attain registration after receiving an exam waiver based on a combination of exams the representative has passed and qualifying work experience. Likewise a new exam requirement may be grandfathered based on a representative's specific qualifying work experience. Exam waivers and grandfathering are not included below.

This individual has passed 0 principal/supervisory exams, 4 general industry/product exams, and 2 state securities law exams.





Principal/Supervisory Exams

Exam	Category	Date
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No information reported.



General Industry/Product Exams

Exam	Category	Date
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 Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
 National Commodity Futures Examination (S3)	Series 3	08/23/1994
 General Securities Representative Examination (S7)	Series 7	09/10/1992
 Direct Participation Programs Representative Examination (S22)	Series 22	04/04/1990

State Securities Law Exams

Exam	Category	Date
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 Uniform Investment Adviser Law Examination (S65)	Series 65	10/09/1992
 Uniform Securities Agent State Law Examination (S63)	Series 63	04/11/1990

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
B	01/16/2009 - 09/29/2020	UBS FINANCIAL SERVICES INC.	CRD# 8174	SAN ANTONIO, TX
IA	01/16/2009 - 09/29/2020	UBS FINANCIAL SERVICES INC.	CRD# 8174	SAN ANTONIO, TX
B	07/31/1993 - 02/05/2009	CITIGROUP GLOBAL MARKETS INC.	CRD# 7059	SAN ANTONIO, TX
IA	07/31/1993 - 02/05/2009	CITIGROUP GLOBAL MARKETS INC.	CRD# 7059	SAN ANTONIO, TX
B	10/01/1992 - 07/31/1993	LEHMAN BROTHERS INC.	CRD# 7506	NEW YORK, NY
B	06/04/1991 - 08/02/1991	TREND SECURITIES, INC.	CRD# 26815	

EMPLOYMENT HISTORY

Below is the representative's employment history for up to the last 10 years.

Employment Dates	Employer Name	Position	Investment Related	Employer Location
01/2009 - Present	UBS FINANCIAL SERVICES INC	FINANCIAL ADVISOR	Y	SAN ANTONIO, TX, 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.

(1)

Name: J. Claybourn Properties, LLC
 Position: Owner Nature: Real Estate / Lease Building /Owner Investment Related: No Hours: 3 Securities Trading Hours: 0
 Start Date: 12/17/2012
 Address: 11131 Vance Jackson Rd., San Antonio TX 78230, United States
 Description: Manage Lease of property. Maintenance and Improvements. Owner

(2)

Name: 993 Management, LLC
 Position: Partner / Owner Nature: Rent / Lease use of structure. Event Center . DBA The Overlook Event Center. Investment Related: No Hours: 4 Securities Trading Hours: 0 Start Date: 10/01/2013
 Address: 11131 Vance Jackson Rd., San Antonio TX 78230, United States
 Description: Owner / Partner. Delegate facility maintenance , grounds maintenance, lease facility for events.



Registration & Employment History



OTHER BUSINESS ACTIVITIES

(3)

Name: Kleenhanz, LLC

Position: Partner Nature: Wholesale and Merchandising / Wholesale Sanitation Wipes-Hand Cleaner / Heavy Duty Cleaning Wipes Investment Related: No Hours: 4 Securities Trading Hours: 1 Start Date: 08/11/2015

Address: 4135 Stahl Rd., San Antonio TX 78217, United States

Description: Sit in on quarterly Board of Management Meetings. Discuss Marketing Ideas and Strategies. Discuss Possible new products.

(4)

Name: Claybourn Collection, LLC.

Position: Manager

Nature: LLC will own personal collectibles

Investment Related: No

Hours: 1

Securities Trading Hours: 0

Start Date: 10/21/2021

Address: 11131 VANCE JACKSON RD, SAN ANTONIO TX 78230-2509, United States

Description: Manager - Add or delete assets from the collection

(5)

Helping Hands Educational Fund, Inc.02/28/2022New02/28/20223

Pending

ViewHistoryNotes

Name: Helping Hands Educational Fund, Inc.

Position: Member, Advisory Committee Nature: The Helping Hands Fund was created to empower people to help themselves through education. The primary recipients of these funds are those individuals experiencing homelessness who are enrolled in programs at San Antonio Metropolitan Ministries (SAMM) or Haven for Hope, also in San Antonio, Texas. Investment Related:

No Hours: 1 Securities Trading Hours: 0 Start Date: 02/24/2022

Address: 4328 Muirfield, San Antonio TX 78229, United States

Additional Info:

Description: I am on the advisory committee as an uncompensated member. We meet or conference call a few times a year. We discuss as a group, at Dr. Green's request and ideas for fund raising events.



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:	CGMI
Allegations:	CLAIMANTS ALLEGE FRAUD BY MISREPRESENTATION AND OMISSION, BREACH OF CONTRACT AND BREACH OF FIDUCIARY DUTY. TIME PERIOD IS UNSPECIFIED.
Product Type:	Other: STRUCTURED PRODUCTS
Alleged Damages:	\$0.00
Alleged Damages Amount Explanation (if amount not exact):	DAMAGES UNSPECIFIED BUT ESTIMATED TO BE OVER \$5,000.
Is this an oral complaint?	No
Is this a written complaint?	No
Is this an arbitration/CFTC reparation or civil litigation?	Yes
Arbitration/Reparation forum or court name and location:	TEXAS DISTRICT COURT, HILDAGO COUNTY
Docket/Case #:	C-0109-12-J
Filing date of arbitration/CFTC reparation or civil litigation:	01/13/2012



Customer Complaint Information

Date Complaint Received: 01/30/2012
Complaint Pending? No
Status: Closed/No Action
Status Date: 12/06/2022

Settlement Amount:

Individual Contribution Amount:

Firm Statement

ON 12/06/2022, ## THIS ARBITRATION WAS DISMISSED BY THE UNITED STATES COURT OF APPEALS FOR THE FIFTH CIRCUIT, DUE TO THE LACK OF ANY FOLLOW THROUGH BY THE PLAINTIFF, ROY S. DALE. ADVISOR'S RESPONSE: ## I WAS NEVER LISTED AS PART OF THIS ACTION / COMPLAINT ##. I HAVE WORKED WITH THIS CLIENT FOR OVER 30 YEARS, PLUS THEY REMAIN A CLIENT OF MINE TO THIS DAY! THE COMPLAINT WAS DIRECTED TOWARDS A PREVIOUS FIRM 4 YEARS AFTER MY DEPARTURE. AND THEIR HANDLING OF A STRUCTURED PRODUCT THAT THEY SPONSORED AND UNDERWROTE.

Reporting Source: Individual

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

Allegations: CLAIMANTS ALLEGE FRAUD BY MISREPRESENTATION AND OMISSION, BREACH OF CONTRACT AND BREACH OF FIDUCIARY DUTY. TIME PERIOD IS UNSPECIFIED.

Product Type: Other: STRUCTURED PRODUCT

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): DAMAGES UNSPECIFIED BUT ESTIMATED TO BE OVER \$5,000.

Is this an oral complaint? No

Is this a written complaint? No

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

Arbitration/Reparation forum or court name and location: TEXAS DISTRICT COURT, HILDAGO COUNTY

Docket/Case #: C-0109-12-J

Filing date of arbitration/CFTC reparation or civil litigation: 01/13/2012

Customer Complaint Information

Date Complaint Received: 01/30/2012
Complaint Pending? No



Status: Closed/No Action

Status Date: 12/06/2022

Settlement Amount:

Individual Contribution Amount:

Broker Statement

ON 12/06/2022, ## THIS ARBITRATION WAS DISMISSED BY THE UNITED STATES COURT OF APPEALS FOR THE FIFTH CIRCUIT, DUE TO THE LACK OF ANY FOLLOW THROUGH BY THE PLAINTIFF, ROY S. DALE.

ADVISOR'S RESPONSE: ## I WAS NEVER LISTED AS PART OF THIS ACTION / COMPLAINT ##. I HAVE WORKED WITH THIS CLIENT FOR OVER 30 YEARS, PLUS THEY REMAIN A CLIENT OF MINE TO THIS DAY! THE COMPLAINT WAS DIRECTED TOWARDS A PREVIOUS FIRM 4 YEARS AFTER MY DEPARTURE. AND THEIR HANDLING OF A STRUCTURED PRODUCT THAT THEY SPONSORED AND UNDERWROTE.

Disclosure 2 of 3

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: SALOMON SMITH BARNEY

Allegations: THE CLIENT ALLEGED MISMANAGEMENT AND LACK OF FIDUCIARY CARE. 2001-2002.

Product Type: Mutual Fund(s)

Other Product Type(s): EQUITIES-LISTED AND OTC.

Alleged Damages: \$51,995.00

Customer Complaint Information

Date Complaint Received: 09/17/2002

Complaint Pending? No

Status: Denied

Status Date: 12/27/2002

Settlement Amount:

Individual Contribution Amount:

Broker Statement CLAIM DENIED.

Disclosure 3 of 3

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: SALOMON SMITH BARNEY

Allegations: THE CLIENT ALLEGED THAT THE PURCHASES OF MUTUAL FUNDS WERE INAPPROPRIATE AND THAT HER FUNDS WERE PLACED IN A MANAGED ACCOUNT WITHOUT HER KNOWLEDGE. 2002. ALLEGED DAMAGES UNSPECIFIED.



Product Type: Mutual Fund(s)
Other Product Type(s): EQUITY - LISTED AND OTC

Alleged Damages:

Customer Complaint Information

Date Complaint Received: 09/03/2002

Complaint Pending? No

Status: Denied

Status Date: 11/14/2002

Settlement Amount:

Individual Contribution Amount:

Broker Statement CLAIM DENIED.



End of Report

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