



IAPD Report

JEFF EDWARD FLOHR

CRD# 2151276

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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

JEFF EDWARD FLOHR (CRD# 2151276)

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 **03/31/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
	FLOHR ASSET MANAGEMENT, LLC	CRD# 159282	01/11/2013

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **1** 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
	FORTIPHI FINANCIAL, LLC	150055	SEATTLE, WA	08/23/2010 - 01/22/2013
	LAKESIDE CAPITAL MANAGEMENT LLC	108155	SEATTLE, WA	12/31/1997 - 12/20/2010

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	2
Termination	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 **1** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **FLOHR ASSET MANAGEMENT, LLC**
Main Address: SEABECK, WA
Firm ID#: 159282

Regulator	Registration	Status	Date
IA Washington	Investment Adviser Representative	Approved	01/11/2013

Branch Office Locations

FLOHR ASSET MANAGEMENT, LLC
SEABECK, WA



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, 0 general industry/product exams, and 1 state securities law exam.

Principal/Supervisory Exams

Exam	Category	Date
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No information reported.

General Industry/Product Exams

Exam	Category	Date
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No information reported.

State Securities Law Exams

Exam	Category	Date
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IA Uniform Investment Adviser Law Examination (S65)	Series 65	09/23/1993
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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	08/23/2010 - 01/22/2013	FORTIPHI FINANCIAL, LLC	CRD# 150055	SEATTLE, WA
IA	12/31/1997 - 12/20/2010	LAKESIDE CAPITAL MANAGEMENT LLC	CRD# 108155	SEATTLE, WA

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
01/2021 - Present	Flohr Consulting Group, LLC	Managing Member	N	Bellevue, WA, United States
11/2011 - Present	FLOHR ASSET MANAGEMENT, LLC	OWNER & INVESTMENT ADVISOR REPRESENTATIVE	Y	BELLEVUE, WA, 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.

On 1/12/2016 Jeff became a board member of LensVector, a private company whose address is 6203 San Ignacio Avenue Suite #110 San Jose, CA 95119. Lensvector's primary business is the shaping and steering of light using dynamic molecular optical technology. Jeff attends board meetings and devotes approx 12 hours per year on this activity. He does not receive any compensation for this board position.

Flohr Consulting Group, LLC; non-investment related consulting; 10900 NE 4th Street, Suite 2300, Bellevue, WA 98004; This entity was formed January 15, 2021. Jeff Flohr is the managing member. Jeff does not limit his working day to traditional business hours and is generally available when his consulting clients need his services, including during the trading day, evenings, and weekends. The number of hours he spends on his consulting business varies too much to approximate but averages approximately 75% of his overall working time. Services provided are outside the scope of investment management and do not include valuation of securities, or the advisability of investing in, purchasing, or selling securities.



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	2
Termination	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 2

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	LAKESIDE CAPITAL MANAGEMENT, LLC
Allegations:	BASED ON INVESTMENTS MADE SINCE 1988, CLIENTS ALLEGE BREACH OF FIDUCIARY DUTY AND VIOLATION OF WASHINGTON SECURITIES ACT AND CONSUMER PROTECTION ACT.
Product Type:	Promissory Note Real Estate Security
Alleged Damages:	\$8,000,000.00
Alleged Damages Amount Explanation (if amount not exact):	COMPLAINT ALLEGES INVESTMENT LOSSES (ESTIMATED ABOVE) ON THE ASSUMPTION THAT THE REMAINING SECURITIES HAVE NO VALUE. LAKESIDE DISPUTES BOTH LIABILITY AND DAMAGES AND ASSERTS THAT INVESTOR HAS NOT SUFFERED ANY OUT OF POCKET LOSS. COMPLAINT ALSO SEEKS RESCISSION AND PREJUDGMENT INTEREST.
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: 09/23/2010



Complaint Pending? Yes

Status:

Status Date: 12/18/2010

Settlement Amount:

Individual Contribution Amount:

Firm Statement

LAKESIDE DENIES THE MERITS OF THE CLAIMS. ON SEPTEMBER 28, 2010 THE PARTIES ENTERED INTO A TOLLING AGREEMENT CONCLUDING ON FEBRUARY 16, 2012 TO ENABLE THEM TO SETTLE THEIR DISPUTE. THIS NOT TO BE CONSTRUED AS AN ASSESSMENT OF THE MERITS OF CLAIMS OR AS AN ACKNOWLEDGMENT OF THE VALIDITY OF THE CLAIMS OR AS AN ADMISSION OF LIABILITY WITH RESPECT TO THE CLAIMS, ALL OF WHICH LAKESIDE CONTESTS.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: LAKESIDE CAPITAL MANAGEMENT, LLC

Allegations: BASED ON INVESTMENTS MADE SINCE 1988, CLIENTS ALLEGE BREACH OF FIDUCIARY DUTY AND VIOLATION OF WASHINGTON SECURITIES ACT AND CONSUMER PROTECTION ACT.

Product Type: Promissory Note
Real Estate Security

Alleged Damages: \$8,000,000.00

Alleged Damages Amount Explanation (if amount not exact): COMPLAINT ALLEGES INVESTMENT LOSSES (ESTIMATED ABOVE) ON THE ASSUMPTION THAT THE REMAINING SECURITIES HAVE NO VALUE. LAKESIDE DISPUTES BOTH LIABILITY AND DAMAGES AND ASSERTS THAT INVESTOR HAS NOT SUFFERED ANY OUT OF POCKET LOSS. COMPLAINT ALSO SEEKS RESCISSION AND PREJUDGMENT INTEREST.

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: 09/23/2010

Complaint Pending? No

Status: Withdrawn

Status Date: 04/14/2011

Settlement Amount:

Individual Contribution Amount:

Broker Statement

FLOHR DENIES THE MERITS OF THE CLAIMS. ON SEPTEMBER 28, 2010 THE PARTIES ENTERED INTO A TOLLING AGREEMENT CONCLUDING ON FEBRUARY 16, 2012 TO ENABLE THEM TO SETTLE THEIR DISPUTE. THIS NOT TO BE CONSTRUED AS AN



ASSESSMENT OF THE MERITS OF CLAIMS OR AS AN ACKNOWLEDGMENT OF THE VALIDITY OF THE CLAIMS OR AS AN ADMISSION OF LIABILITY WITH RESPECT TO THE CLAIMS, ALL OF WHICH FLOHR CONTEST.

Disclosure 2 of 2

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: LAKESIDE CAPITAL AND LAKESIDE ADVISORS

Allegations: PLANTIFFS ALLEGED UNSUITABLE OR MISLEADING INVESTMENT ADVICE AND MANAGEMENT IN BREACH OF FIDUCIARY DUTIES AND WASHINGTON STATE SECURITIES AND CONSUMER PROTECTION STATUTES BEGINNING IN THE 1990S THROUGH JUNE 30, 2002. DEFENDANTS DENIED THESE ALLEGATIONS.

Product Type: Other: PRIVATE FUNDS

Alleged Damages: \$1,400,000.00

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: 07/11/2003

Complaint Pending? No

Status: Settled

Status Date: 01/26/2005

Settlement Amount: \$700,000.00

Individual Contribution Amount: \$100,000.00

Civil Litigation Information

Type of Court: State Court

Name of Court: SUPERIOR COURT OF THE STATE OF WASHINGTON

Location of Court: KING COUNTY, SEATTLE

Docket/Case #: 2003

Date Notice/Process Served: 07/11/2003

Litigation Pending? No

Disposition: Settled

Disposition Date: 01/26/2005

Monetary Compensation Amount: \$700,000.00

Individual Contribution Amount: \$100,000.00



Firm Statement SETTLEMENT IS NOT TO BE CONSTRUED AS AN ASSESSMENT OF THE MERITS OF CLAIMS AND DEFENSES IN THE LAW SUIT, AS AN ACKNOWLEDGEMENT OF THE VALIDITY OF THE CLAIMS AND DEFENSES IN THE LAW SUIT, OR AS AN ADMISSION OF LIABILITY WITH RESPECT TO CONTESTED CLAIMS.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: LAKESIDE CAPITAL AND LAKESIDE ADVISORS

Allegations: PLAINTIFFS ALLEGED UNSUITABLE OR MISLEADING INVESTMENT ADVICE AND MANAGEMENT IN BREACH OF FIUCIARY DUTIES AND WASHINGTON STATE SECURITIES AND CONSUMER PROTECTION STATUTES BEGINNING IN THE 1990S THROUGH JUNE 30, 2002. DEFENDANTS DENIED THESE ALLEGATIONS.

Product Type: Other: PRIVATE FUNDS

Alleged Damages: \$1,400,000.00

Customer Complaint Information

Date Complaint Received: 07/11/2003

Complaint Pending? No

Status: Settled

Status Date: 01/26/2005

Settlement Amount: \$700,000.00

Individual Contribution Amount: \$0.00

Civil Litigation Information

Disposition: Settled

Disposition Date: 01/26/2005

Broker Statement SETTLEMENT IS NOT TO BE CONSTRUED AS AN ASSESSMENT OF THE MERITS OF CLAIMS AND DEFENSES IN THE LAW SUIT, AS AN ACKNOWLEDGEMENT OF THE VALIDITY OF THE CLAIMS AND DEFENSES IN THE LAW SUIT, OR AS AN ADMISSION OF LIABILITY WITH RESPECT TO CONTESTED CLAIMS.



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 3

Reporting Source: Firm

Firm Name: LAKESIDE CAPITAL MANAGEMENT, LLC

Termination Type: Voluntary Resignation

Termination Date: 11/11/2009

Allegations: FAILURE TO PROPERLY SUPERVISE (A) LAKESIDE'S OUTSIDE COUNSEL AND (B) DOUGLAS JOHNSON, THE COMPANY'S CHIEF COMPLIANCE OFFICER, DURING THE PERIOD THAT FLOHR SERVED AS MANAGER OF LAKESIDE. EVENTS OCCURRED THAT BECAME THE SUBJECT OF CLIENT COMPLAINTS ALLEGING MULTI-MILLION DOLLAR DAMAGES.

Product Type: Promissory Note
Real Estate Security

Reporting Source: Individual

Firm Name: LAKESIDE CAPITAL MANAGEMENT, LLC

Termination Type: Voluntary Resignation

Termination Date: 11/11/2009

Allegations: FORMER BUSINESS PARTER ALLEGED THAT FLOHR FAILED TO PROPERLY SUPERVISE (A) LAKESIDE'S OUTSIDE COUNSEL AND (B) DOUGLAS JOHNSON, THE COMPANY'S CHIEF COMPLIANCE OFFICER, DURING THE PERIOD THAT FLOHR SERVED AS MANAGER OF LAKESIDE.

Product Type: No Product

Broker Statement FLOHR DENIES THE MERITS OF THE ALLEGATION ASSOCIATED WITH THE DISTRIBUTION OF COMPANY PROPERTY. A SETTLEMENT BETWEEN THE FORMER PARTNERS WAS REACHED.

Disclosure 2 of 3

Reporting Source: Firm

Firm Name: LAKESIDE CAPITAL MANAGEMENT, LLC

Termination Type: Voluntary Resignation

Termination Date: 11/11/2009

Allegations: FLOHR MISAPPROPRIATED LAKESIDE'S TRADE SECRETS AND CONFIDENTIAL CLIENT INFORMATION.

Product Type: No Product

Reporting Source: Individual

Firm Name: LAKESIDE CAPITAL MANAGEMENT, LLC



Termination Type: Voluntary Resignation
Termination Date: 11/11/2009
Allegations: FORMER BUSINESS PARTNER ALLEGED THAT FLOHR MISAPPROPRIATED CONFIDENTIAL CLIENT INFORMATION IN VIOLATION OF REGULATION SP.
Product Type: No Product
Broker Statement FLOHR DENIES THE MERITS OF THE ALLEGATION ASSOCIATED WITH THE DISTRIBUTION OF COMPANY PROPERTY. A SETTLEMENT BETWEEN THE FORMER PARTNERS WAS REACHED.

Disclosure 3 of 3

Reporting Source: Firm
Firm Name: LAKESIDE CAPITAL MANAGEMENT, LLC
Termination Type: Voluntary Resignation
Termination Date: 11/11/2009
Allegations: FLOHR MISAPPROPRIATED CONFIDENTIAL CLIENT INFORMATION IN VIOLATION OF REGULATION S-P.
Product Type: No Product

Reporting Source: Individual
Firm Name: LAKESIDE CAPITAL MANAGEMENT, LLC
Termination Type: Voluntary Resignation
Termination Date: 11/11/2009
Allegations: FORMER BUSINESS PARTNER ALLEGED THAT FLOHR MISAPPROPRIATED LAKESIDE'S TRADE SECRETS AND CONFIDENTIAL CLIENT INFORMATION.
Product Type: No Product



End of Report

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