



## IAPD Report

# Kevin F Douglas

CRD# 2160517

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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

### Kevin F Douglas (CRD# 2160517)

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 **07/09/2025**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
<b>B</b>	J.P. MORGAN SECURITIES LLC	CRD# 79	09/29/2023
<b>IA</b>	J.P. MORGAN SECURITIES LLC	CRD# 79	01/18/2024

### QUALIFICATIONS

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

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

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

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

### REGISTRATION HISTORY

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

	FIRM	CRD#	LOCATION	REGISTRATION DATES
<b>IA</b>	J.P. MORGAN PRIVATE WEALTH ADVISORS LLC	108559	San Rafael, CA	03/19/2012 - 03/21/2025
<b>B</b>	FIRST REPUBLIC SECURITIES COMPANY, LLC	105108	San Rafael, CA	03/16/2012 - 09/29/2023
<b>B</b>	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	7691	MILL VALLEY, CA	10/23/2009 - 03/21/2012

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

### DISCLOSURE INFORMATION

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

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

The following types of events are disclosed about this representative:

Type	Count
Customer Dispute	3



## Qualifications

### REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works. This individual is currently registered with **51** jurisdiction(s) and 27 SRO(s) through his or her employer(s).

### Employment 1 of 1

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

Regulator	Registration	Status	Date
<b>B</b> 24X National Exchange LLC	General Securities Representative	Approved	10/31/2025
<b>B</b> BOX Exchange LLC	General Securities Representative	Approved	04/15/2024
<b>B</b> Cboe BYX Exchange, Inc.	General Securities Representative	Approved	04/15/2024
<b>B</b> Cboe BZX Exchange, Inc.	General Securities Representative	Approved	04/15/2024
<b>B</b> Cboe C2 Exchange, Inc.	General Securities Representative	Approved	04/15/2024
<b>B</b> Cboe EDGA Exchange, Inc.	General Securities Representative	Approved	04/15/2024
<b>B</b> Cboe EDGX Exchange, Inc.	General Securities Representative	Approved	04/15/2024
<b>B</b> Cboe Exchange, Inc.	General Securities Representative	Approved	04/15/2024
<b>B</b> FINRA	General Securities Representative	Approved	09/29/2023
<b>B</b> Investors' Exchange LLC	General Securities Representative	Approved	04/15/2024
<b>B</b> Long-Term Stock Exchange, Inc.	General Securities Representative	Approved	04/15/2024
<b>B</b> MEMX LLC	General Securities Representative	Approved	04/15/2024
<b>B</b> MIAX Emerald, LLC	General Securities Representative	Approved	04/15/2024



### Qualifications

Regulator	Registration	Status	Date
<b>B</b> MIAX PEARL, LLC	General Securities Representative	Approved	04/15/2024
<b>B</b> MIAX Sapphire	General Securities Representative	Approved	09/23/2024
<b>B</b> Miami International Securities Exchange, LLC	General Securities Representative	Approved	04/15/2024
<b>B</b> NYSE American LLC	General Securities Representative	Approved	04/15/2024
<b>B</b> NYSE Arca, Inc.	General Securities Representative	Approved	04/15/2024
<b>B</b> NYSE National, Inc.	General Securities Representative	Approved	04/15/2024
<b>B</b> NYSE Texas, Inc.	General Securities Representative	Approved	04/15/2024
<b>B</b> Nasdaq GEMX, LLC	General Securities Representative	Approved	04/15/2024
<b>B</b> Nasdaq ISE, LLC	General Securities Representative	Approved	04/15/2024
<b>B</b> Nasdaq MRX, LLC	General Securities Representative	Approved	04/15/2024
<b>B</b> Nasdaq PHLX LLC	General Securities Representative	Approved	04/15/2024
<b>B</b> Nasdaq Stock Market	General Securities Representative	Approved	04/15/2024
<b>B</b> Nasdaq Texas, LLC	General Securities Representative	Approved	04/15/2024
<b>B</b> New York Stock Exchange	General Securities Representative	Approved	04/15/2024
<b>B</b> Alabama	Agent	Approved	09/29/2023
<b>B</b> Alaska	Agent	Approved	02/02/2024
<b>B</b> Arizona	Agent	Approved	09/29/2023
<b>B</b> Arkansas	Agent	Approved	01/30/2024



## Qualifications

Regulator	Registration	Status	Date
<b>B</b> California	Agent	Approved	09/29/2023
<b>IA</b> California	Investment Adviser Representative	Approved	01/18/2024
<b>B</b> Colorado	Agent	Approved	09/29/2023
<b>B</b> Connecticut	Agent	Approved	09/29/2023
<b>B</b> Delaware	Agent	Approved	01/31/2024
<b>B</b> District of Columbia	Agent	Approved	09/29/2023
<b>B</b> Florida	Agent	Approved	09/29/2023
<b>B</b> Georgia	Agent	Approved	01/22/2024
<b>B</b> Hawaii	Agent	Approved	09/29/2023
<b>B</b> Idaho	Agent	Approved	01/22/2024
<b>B</b> Illinois	Agent	Approved	09/29/2023
<b>B</b> Indiana	Agent	Approved	01/23/2024
<b>B</b> Iowa	Agent	Approved	01/22/2024
<b>B</b> Kansas	Agent	Approved	01/18/2024
<b>B</b> Kentucky	Agent	Approved	01/23/2024
<b>B</b> Louisiana	Agent	Approved	01/29/2024
<b>B</b> Maine	Agent	Approved	01/23/2024
<b>B</b> Maryland	Agent	Approved	09/29/2023
<b>B</b> Massachusetts	Agent	Approved	09/29/2023



### Qualifications

Regulator	Registration	Status	Date
<b>B</b> Michigan	Agent	Approved	09/29/2023
<b>B</b> Minnesota	Agent	Approved	01/18/2024
<b>B</b> Missouri	Agent	Approved	09/29/2023
<b>B</b> Montana	Agent	Approved	09/29/2023
<b>B</b> Nevada	Agent	Approved	09/29/2023
<b>B</b> New Hampshire	Agent	Approved	01/19/2024
<b>B</b> New Jersey	Agent	Approved	09/29/2023
<b>B</b> New Mexico	Agent	Approved	01/18/2024
<b>B</b> New York	Agent	Approved	09/29/2023
<b>B</b> North Carolina	Agent	Approved	09/29/2023
<b>B</b> North Dakota	Agent	Approved	01/22/2024
<b>B</b> Ohio	Agent	Approved	09/29/2023
<b>B</b> Oklahoma	Agent	Approved	09/29/2023
<b>B</b> Oregon	Agent	Approved	09/29/2023
<b>B</b> Pennsylvania	Agent	Approved	01/18/2024
<b>B</b> Puerto Rico	Agent	Approved	01/24/2024
<b>B</b> Rhode Island	Agent	Approved	01/18/2024
<b>B</b> South Carolina	Agent	Approved	09/29/2023



### Qualifications

Regulator	Registration	Status	Date
<b>B</b> South Dakota	Agent	Approved	01/18/2024
<b>B</b> Tennessee	Agent	Approved	01/18/2024
<b>B</b> Texas	Agent	Approved	09/29/2023
<b>IA</b> Texas	Investment Adviser Representative	Restricted Approval	01/18/2024
<b>B</b> Utah	Agent	Approved	09/29/2023
<b>B</b> Vermont	Agent	Approved	01/18/2024
<b>B</b> Virgin Islands	Agent	Approved	01/25/2024
<b>B</b> Virginia	Agent	Approved	01/18/2024
<b>B</b> Washington	Agent	Approved	09/29/2023
<b>B</b> West Virginia	Agent	Approved	01/26/2024
<b>B</b> Wisconsin	Agent	Approved	01/18/2024
<b>B</b> Wyoming	Agent	Approved	11/06/2023

### Branch Office Locations

**J.P. MORGAN SECURITIES LLC**  
Petaluma, CA



## 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, 2 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
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General Securities Representative Examination (S7)	Series 7	08/06/1991
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#### State Securities Law Exams

Exam	Category	Date
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Uniform Investment Adviser Law Examination (S65)	Series 65	11/10/1997
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Uniform Securities Agent State Law Examination (S63)	Series 63	08/21/1991
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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	03/19/2012 - 03/21/2025	J.P. MORGAN PRIVATE WEALTH ADVISORS LLC	CRD# 108559	San Rafael, CA
B	03/16/2012 - 09/29/2023	FIRST REPUBLIC SECURITIES COMPANY, LLC	CRD# 105108	San Rafael, CA
B	10/23/2009 - 03/21/2012	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	MILL VALLEY, CA
IA	10/23/2009 - 03/21/2012	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	MILL VALLEY, CA
IA	04/22/2002 - 10/23/2009	BANC OF AMERICA INVESTMENT SERVICES, INC.	CRD# 16361	SAN FRANCISCO, CA
B	08/08/2000 - 10/23/2009	BANC OF AMERICA INVESTMENT SERVICES, INC.	CRD# 16361	SAN FRANCISCO, CA
B	04/07/1999 - 07/31/2000	WELLS FARGO SECURITIES INC.	CRD# 17438	SAN FRANCISCO, CA
B	04/03/1998 - 03/18/1999	KEY INVESTMENTS INC.	CRD# 15873	CLEVELAND, OH
B	08/19/1996 - 04/17/1998	WELLS FARGO SECURITIES INC.	CRD# 17438	SAN FRANCISCO, CA
B	10/05/1995 - 08/19/1996	FIRST INTERSTATE INVESTMENTS, INC.	CRD# 17101	
B	10/02/1993 - 09/15/1995	SEAFIRST INVESTMENT SERVICES, INC.	CRD# 17411	SEATTLE, WA
B	08/16/1991 - 12/23/1991	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	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
10/2023 - Present	JPMORGAN CHASE BANK, N.A.	WORKFORCE MEMBER	Y	San Francisco, CA, United States



## Registration & Employment History

### EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
09/2023 - Present	J.P. Morgan Securities LLC	REGISTERED REPRESENTATIVE	Y	San Francisco, CA, United States
04/2017 - Present	First Republic Investment Management, Inc.	Wealth Manager	Y	San Francisco, CA, United States
04/2017 - 10/2023	First Republic Securities Company, LLC	Wealth Manager	Y	San Francisco, CA, United States
03/2012 - 04/2017	FIRST REPUBLIC INVESTMENT MANAGEMENT	INVESTMENT ADVISOR	Y	SAN FRANCISCO, CA, United States
03/2012 - 04/2017	FIRST REPUBLIC SECURITIES COMPANY, LLC	INVESTMENT CONSULTANT	Y	SAN FRANCISCO, 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.

No information reported.



## 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

<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	BANC OF AMERICA INVESTMENT SERVICES, INC.
<b>Allegations:</b>	MISREPRESENTATION
<b>Product Type:</b>	Other: AUCTION RATE SECURITIES - CLOSED-END FUNDS
<b>Alleged Damages:</b>	\$0.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	UNSPECIFIED
<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>	06/09/2009
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	06/09/2009
<b>Settlement Amount:</b>	\$2,950,000.00



**Individual Contribution Amount:** \$0.00

**Broker Statement** THIS MATTER INVOLVES THE SALE OF AUCTION RATE SECURITIES (ARS). THE TRANSACTION(S) AT ISSUE TOOK PLACE BEFORE MID-FEBRUARY 2008, WHEN THE ARS MARKET SUFFERED WIDESPREAD AUCTION FAILURES AND ILLIQUIDITY. THE FINANCIAL ADVISOR DID NOT CAUSE, CONTRIBUTE OR HAVE ANY CONTROL WHATSOEVER OVER THESE MARKET EVENTS. THE FIRM REACHED AGREEMENT WITH CERTAIN OF ITS REGULATORS, PURSUANT TO WHICH IT REPURCHASED ARS FOR THEIR FULL PAR VALUE FROM CERTAIN CLIENTS, INCLUDING THE INSTANT CLIENT, WHERE THEY COMPLAINED OR NOT. THE FINANCIAL ADVISOR WAS NOT A PARTY TO THAT AGREEMENT, DID NOT MAKE ANY PAYMENT TO THE CLIENT, AND WAS NOT ASKED TO AND DID NOT CONTRIBUTE TO THE REPURCHASE AMOUNT. THE SETTLEMENT AMOUNT IN ITEM 11 ABOVE REFLECTS THE PAR VALUE OF THE REPURCHASED ARS, AS REQUIRED BY FINRA REGULATORY NOTICE 09-12.

### Disclosure 2 of 3

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** BANC OF AMERICA INVESTMENT SERVICES, INC.

**Allegations:** MISREPRESENTATION

**Product Type:** Other: AUCTION RATE SECURITIES - CLOSED-END FUNDS

**Alleged Damages:** \$0.00

**Alleged Damages Amount Explanation (if amount not exact):** UNSPECIFIED

**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:** 06/09/2009

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 06/09/2009

**Settlement Amount:** \$350,000.00

**Individual Contribution Amount:** \$0.00

**Broker Statement** THIS MATTER INVOLVES THE SALE OF AUCTION RATE SECURITIES (ARS). THE TRANSACTION(S) AT ISSUE TOOK PLACE BEFORE MID-FEBRUARY 2008, WHEN THE ARS MARKET SUFFERED WIDESPREAD AUCTION FAILURES AND ILLIQUIDITY. THE FINANCIAL ADVISOR DID NOT CAUSE, CONTRIBUTE OR HAVE ANY CONTROL WHATSOEVER OVER THESE MARKET EVENTS. THE FIRM REACHED AGREEMENT WITH CERTAIN OF ITS REGULATORS, PURSUANT TO WHICH IT REPURCHASED ARS FOR THEIR



FULL PAR VALUE FROM CERTAIN CLIENTS, INCLUDING THE INSTANT CLIENT, WHERE THEY COMPLAINED OR NOT. THE FINANCIAL ADVISOR WAS NOT A PARTY TO THAT AGREEMENT, DID NOT MAKE ANY PAYMENT TO THE CLIENT, AND WAS NOT ASKED TO AND DID NOT CONTRIBUTE TO THE REPURCHASE AMOUNT. THE SETTLEMENT AMOUNT IN ITEM 11 ABOVE REFLECTS THE PAR VALUE OF THE REPURCHASED ARS, AS REQUIRED BY FINRA REGULATORY NOTICE 09-12.

### Disclosure 3 of 3

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** BANC OF AMERICA INVESTMENT SERVICES, INC.

**Allegations:** MISREPRESENTATION

**Product Type:** Other: AUCTION RATE SECURITIES - CLOSED-END FUNDS

**Alleged Damages:** \$0.00

**Alleged Damages Amount Explanation (if amount not exact):** UNSPECIFIED

**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:** 06/09/2009

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 06/09/2009

**Settlement Amount:** \$6,000,000.00

**Individual Contribution Amount:** \$0.00

### Broker Statement

THIS MATTER INVOLVES THE SALE OF AUCTION RATE SECURITIES (ARS). THE TRANSACTION(S) AT ISSUE TOOK PLACE BEFORE MID-FEBRUARY 2008, WHEN THE ARS MARKET SUFFERED WIDESPREAD AUCTION FAILURES AND ILLIQUIDITY. THE FINANCIAL ADVISOR DID NOT CAUSE, CONTRIBUTE OR HAVE ANY CONTROL WHATSOEVER OVER THESE MARKET EVENTS. THE FIRM REACHED AGREEMENT WITH CERTAIN OF ITS REGULATORS, PURSUANT TO WHICH IT REPURCHASED ARS FOR THEIR FULL PAR VALUE FROM CERTAIN CLIENTS, INCLUDING THE INSTANT CLIENT, WHERE THEY COMPLAINED OR NOT. THE FINANCIAL ADVISOR WAS NOT A PARTY TO THAT AGREEMENT, DID NOT MAKE ANY PAYMENT TO THE CLIENT, AND WAS NOT ASKED TO AND DID NOT CONTRIBUTE TO THE REPURCHASE AMOUNT. THE SETTLEMENT AMOUNT IN ITEM 11 ABOVE REFLECTS THE PAR VALUE OF THE REPURCHASED ARS, AS REQUIRED BY FINRA REGULATORY NOTICE 09-12.



## End of Report

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