



IAPD Report

SCOTT THOMAS WOLFRUM

CRD# 2187550

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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

SCOTT THOMAS WOLFRUM (CRD# 2187550)

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 **11/03/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	ELPIS CAPITAL GROUP, LLC	CRD# 175494	09/10/2024

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
IA	WOLFRUM AND CO.	291243	Indianapolis, IN	02/01/2018 - 04/23/2024
B	HUNTLEIGH SECURITIES CORPORATION	7456	Indianapolis, IN	01/03/2018 - 09/23/2019
IA	NOYES ADVISORS LLC	226606	CHICAGO, IL	08/11/2015 - 01/04/2018

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

DISCLOSURE INFORMATION

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

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

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1
Customer Dispute	6
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 **1** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **ELPIS CAPITAL GROUP, LLC**
Main Address: 7190 E 106TH STREET
FISHERS, IN 46038
Firm ID#: 175494

Regulator	Registration	Status	Date
IA Indiana	Investment Adviser Representative	Approved	09/10/2024

Branch Office Locations

ELPIS CAPITAL GROUP, LLC
7190 E 106th Street
Fishers, IN 46038



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

Principal/Supervisory Exams

Exam	Category	Date
General Securities Sales Supervisor - General Module Examination (S10)	Series 10	11/19/2003
General Securities Sales Supervisor - Options Module Examination (S9)	Series 9	11/19/2003

General Industry/Product Exams

Exam	Category	Date
Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
Futures Managed Funds Examination (S31)	Series 31	04/21/2009
General Securities Representative Examination (S7)	Series 7	12/11/1991

State Securities Law Exams

Exam	Category	Date
Uniform Securities Agent State Law Examination (S63)	Series 63	01/14/1992

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	02/01/2018 - 04/23/2024	WOLFRUM AND CO.	CRD# 291243	Indianapolis, IN
B	01/03/2018 - 09/23/2019	HUNTLEIGH SECURITIES CORPORATION	CRD# 7456	Indianapolis, IN
IA	08/11/2015 - 01/04/2018	NOYES ADVISORS LLC	CRD# 226606	CHICAGO, IL
B	05/24/2013 - 01/04/2018	DAVID A. NOYES & COMPANY	CRD# 205	INDIANAPOLIS, IN
IA	05/28/2013 - 08/11/2015	DAVID A. NOYES & COMPANY	CRD# 205	INDIANAPOLIS, IN
B	08/05/2011 - 05/28/2013	WELLS FARGO ADVISORS FINANCIAL NETWORK, LLC	CRD# 11025	INDIANAPOLIS, IN
IA	08/05/2011 - 05/28/2013	WELLS FARGO ADVISORS FINANCIAL NETWORK, LLC	CRD# 11025	INDIANAPOLIS, IN
B	01/01/2008 - 08/05/2011	WELLS FARGO ADVISORS, LLC	CRD# 19616	INDIANAPOLIS, IN
IA	01/01/2008 - 08/05/2011	WELLS FARGO ADVISORS, LLC	CRD# 19616	INDIANAPOLIS, IN
B	10/25/1996 - 01/03/2008	A. G. EDWARDS & SONS, INC.	CRD# 4	INDIANAPOLIS, IN
IA	12/30/1998 - 01/01/2008	A. G. EDWARDS & SONS, INC.	CRD# 4	INDIANAPOLIS, IN
B	12/12/1991 - 10/18/1996	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
03/2021 - Present	ELPIS CAPITAL GROUP, LLC	MANAGING PARTNER	Y	INDIANAPOLIS, IN, United States
01/2018 - Present	Wolfrum and Company, LLC	President	Y	INDIANAPOLIS, IN, United States
01/2018 - 02/2021	FOUNDRY CAPITAL GROUP, LLC	MANAGING PARTNER	Y	INDIANAPOLIS, IN, United States



Registration & Employment History

EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
08/2015 - 12/2017	NOYES ADVISORS LLC	Mass Transfer	Y	CHICAGO, IL, United States
05/2013 - 12/2017	DAVID A. NOYES & COMPANY	REGISTERED REPRESENTATIVE	Y	INDIANAPOLS, IN, 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)PERFINITY BIOSCIENCES, INC.; NOT INVESTMENT-RELATED; DIAGNOSTIC SYSTEM; WEST LAFAYETTE, IN; INVESTOR - LESS THAN 8% OWNERSHIP; INVESTED SINCE 10/2005; NO DUTIES OR TIME SPENT.
- 2)ELPIS OPPORTUNITIES FUND; LIMITED PARTNERSHIP; INVESTMENT-RELATED; INDIANAPOLIS IN; OWNER, START DATE 11/01/16, 2 HOURS WEEKLY DURING BUSINESS HOURS.
- 3)SUPERNOVA, INVESTMENT-RELATED, INDIANAPOLIS IN, BOARD MEMBER, START DATE 12/01/16, 1 HOUR MONTHLY DURING BUSINESS HOURS.
- 4)WARSAW CHEMICAL COMPANY; NOT INVESTMENT-RELATED; WARSAW, IN; MAJORITY OWNER
- 5) SWSS ACQUISITION LLC DBA NORTHSIDE GARAGE DOOR SYSTEMS, INVESTED 2/2021, 50% OWNER, NOT INVESTMENT-RELATED; MUNCIE IN; MINIMAL TIME PER MONTH



Disclosure Summary

Disclosure Information

What you should know about reported disclosure events:

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

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

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

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

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

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

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



DISCLOSURE EVENT DETAILS

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

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

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1
Customer Dispute	6
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 1

Reporting Source:	Regulator
Regulatory Action Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Sanction(s) Sought:	Cease and Desist
Date Initiated:	03/24/2021
Docket/Case Number:	3-20252
Employing firm when activity occurred which led to the regulatory action:	Wolfrum Capital Management LLC
Product Type:	Other: Interests in Foundry Mezzanine Opportunity Fund
Allegations:	The Securities and Exchange Commission ("Commission") deems it appropriate and in the public interest that public administrative and cease-and-desist proceedings be, and hereby are, instituted pursuant to Section 15(b) of the Securities Exchange Act of 1934 ("Exchange Act") and Sections 203(f) and 203(k) of the Investment Advisers Act of 1940 ("Advisers Act"), against Scott T. Wolfrum ("Respondent").

The Commission finds that these proceedings arise out of investment adviser Scott Wolfrum's failure to disclose conflicts of interest when recommending that his advisory clients invest in Foundry Mezzanine Opportunity Fund ("FMOF" or the "Fund"), a private fund that provides lending to and invests in small businesses. From December 2015 to June 2018 ("Relevant Period"), Wolfrum sold more than \$20 million in interests in FMOF, almost all of which were recommended by Wolfrum and sold to his advisory clients. Wolfrum failed to disclose to his clients



the conflicts of interest created by his and his family members' financial interests in two of the Fund's holdings and Wolfrum's receipt of \$140,125 in finder's fees for facilitating two different investments by the Fund.

Current Status:

Final

Resolution:

Order

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

Yes

Resolution Date:

03/24/2021

Sanctions Ordered:

Cease and Desist
Censure
Civil and Administrative Penalty(ies)/Fine(s)
Disgorgement
Monetary Penalty other than Fines
Other: Undertakings

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?

Yes

(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?

Yes



(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

No

(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?

No

Monetary Sanction 1 of 3

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

Total Amount: \$75,000.00

Portion Levied against individual: \$75,000.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Monetary Sanction 2 of 3

Monetary Related Sanction: Monetary Penalty other than Fines

Total Amount: \$21,354.00

Portion Levied against individual: \$21,354.00



Payment Plan: prejudgment interest on disgorgement

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Monetary Sanction 3 of 3

Monetary Related Sanction: Disgorgement

Total Amount: \$140,125.00

Portion Levied against individual: \$140,125.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Regulator Statement Respondent Wolfrum has submitted an Offer of Settlement, which the Commission has determined to accept. Wolfrum willfully violated Section 206(2) of the Advisers Act. Accordingly, it is hereby ordered that Wolfrum cease and desist from committing or causing any violations and any future violations of Section 206(2) of the Advisers Act; is censured; and shall pay disgorgement of \$140,125, prejudgment interest of \$21,354, and a civil money penalty of \$75,000 to the Commission. Respondent shall comply with the undertakings enumerated in the Order.

Reporting Source: Individual

Regulatory Action Initiated By: UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Sanction(s) Sought: Cease and Desist
Censure
Civil and Administrative Penalty(ies)/Fine(s)

Date Initiated: 03/28/2018

Docket/Case Number: 3-20252

Employing firm when activity occurred which led to the regulatory action: WAS EMPLOYED BY DAVID A. NOYES AT THE TIME VIOLATIONS OCCURRED. INQUIRY BEGAN IN 2018 AFTER EMPLOYMENT AT NOYES CEASED.

Product Type: Direct Investment-DPP & LP Interests

Allegations: FAILURE TO DISCLOSE MATERIAL INFORMATION TO INVESTORS OF THE FOUNDRY MEZZANINE OPPORTUNITY FUND, LP.

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?	Yes
Resolution Date:	03/24/2021
Sanctions Ordered:	Cease and Desist Censure Civil and Administrative Penalty(ies)/Fine(s) Other: FAILURE TO DISCLOSE MATERIAL INFORMATION TO INVESTORS IN THE FOUNDRY MEZZANINE OPPORTUNITY FUND, LP
Monetary Sanction 1 of 2	
Monetary Related Sanction:	Disgorgement
Total Amount:	\$140,125.00
Portion Levied against individual:	\$140,125.00
Payment Plan:	YES
Is Payment Plan Current:	Yes
Date Paid by individual:	03/24/2021
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:	\$75,000.00
Portion Levied against individual:	\$75,000.00
Payment Plan:	YES
Is Payment Plan Current:	Yes
Date Paid by individual:	
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 6

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	DAVID A. NOYES & COMPANY
Allegations:	Client alleges inadequate due diligence for 2015 investment.
Product Type:	Other: Non-traded Business Development Company
Alleged Damages:	\$50,000.00
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:	FINRA
Docket/Case #:	22-01243
Filing date of arbitration/CFTC reparation or civil litigation:	06/03/2022

Customer Complaint Information

Date Complaint Received:	06/08/2022
Complaint Pending?	No
Status:	Settled
Status Date:	06/29/2022
Settlement Amount:	\$20,000.00
Individual Contribution Amount:	\$0.00

Disclosure 2 of 6

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	DAVID A. NOYES & COMPANY
Allegations:	Customer alleges selling of unsuitable investments beginning in 2008.
Product Type:	Other: Alternative Investment
Alleged Damages:	\$11,000,000.00



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: FINRA

Docket/Case #: 21-03047

Filing date of arbitration/CFTC reparation or civil litigation: 12/16/2021

Customer Complaint Information

Date Complaint Received: 12/21/2021

Complaint Pending? No

Status: Settled

Status Date: 04/12/2023

Settlement Amount: \$2,650,000.00

Individual Contribution Amount: \$0.00

Disclosure 3 of 6

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: DAVID A. NOYES & COMPANY

Allegations: Improper Investment Recommendation for products purchased in 2016.

Product Type: Other: Alternative Investments/REIT

Alleged Damages: \$250,000.00

Alleged Damages Amount Explanation (if amount not exact): Customer stated "between \$100000 and \$500000. Average amount used.

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: FINRA

Docket/Case #: 21-01658

Filing date of arbitration/CFTC reparation or civil litigation: 07/01/2021

Customer Complaint Information

Date Complaint Received: 07/07/2021



Complaint Pending? No
Status: Settled
Status Date: 02/01/2023
Settlement Amount: \$15,000.00
Individual Contribution Amount: \$15,000.00

Disclosure 4 of 6

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: Huntleigh Securities Corporation
Allegations: Complainant alleges that the purchase of a private placement was made without complainant's approval. Date of activity was 01/11/2018.
Product Type: Other: Private Placement
Alleged Damages: \$500,000.00
Alleged Damages Amount Explanation (if amount not exact): Amount of investment was \$450,000
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: 03/18/2019
Complaint Pending? No
Status: Settled
Status Date: 04/09/2019
Settlement Amount: \$449,300.00
Individual Contribution Amount: \$0.00

Broker Statement
The complainant is a trust account. The trustee of the trust signed and initialed numerous documents requesting the purchase. The settlor of the trust claimed he did not approve of the transaction. Despite the trustee's approval, the private placement agreed to rescind the transaction. The trust redeemed its shares of the private placement in exchange for the settlement amount.

Disclosure 5 of 6

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: WELLS FARGO FINANCIAL NETWORK, LLC



Allegations: COMPLAINT: CLIENT ALLEGED ANNUITY UNSUITABLE AND CONCENTRATION OF ANNUITIES IN ACCOUNT. (1/27/12-2/6/13)
 ARBITRATION: CLAIMANT ALLEGES THAT INVESTMENTS MADE IN OR AROUND 2011 WERE MISREPRESENTED AND UNSUITABLE.

Product Type: Annuity-Variable

Alleged Damages: \$21,205.35

Alleged Damages Amount Explanation (if amount not exact): COMPLAINT: DAMAGES NOT SPECIFIED, BUT BELIEVED OVER \$5000.
 ARBITRATION: CLAIMANT SEEKS ACTUAL DAMAGES OF \$21,205.35 PLUS FEES AND COSTS.

Is this an oral complaint? No

Is this a written complaint? Yes

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

Arbitration/Reparation forum or court name and location: FINRA

Docket/Case #: 13-02793

Filing date of arbitration/CFTC reparation or civil litigation: 10/01/2013

Customer Complaint Information

Date Complaint Received: 10/01/2013

Complaint Pending? No

Status: Settled

Status Date: 12/16/2013

Settlement Amount: \$10,000.00

Individual Contribution Amount: \$0.00

Firm Statement WITHOUT ADMITTING ANY LIABILITY AND IN ORDER TO AVOID THE COSTS AND UNCERTAINTY OF FURTHER LITIGATION, THIS MATTER WAS SETTLED FOR THE SUM OF \$10,000.00.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: WELLS FARGO FINANCIAL NETWORK, LLC

Allegations: CLIENT ALLEGED ANNUITY UNSUITABLE AND CONCENTRATION OF ANNUITIES IN ACCOUNT. (1/27/12-2/6/13)

Product Type: Annuity-Variable

Alleged Damages: \$21,205.35

Alleged Damages Amount Explanation (if amount not exact): DAMAGES NOT SPECIFIED, BUT BELIEVED OVER \$5000. ARBITRATION CLAIMANT SEEKS ACTUAL DAMAGES OF \$21,205.35 PLUS FEES AND COST.

Is this an oral complaint? No



Is this a written complaint? Yes
**Is this an arbitration/CFTC
reparation or civil litigation?** Yes
**Arbitration/Reparation forum
or court name and location:** FINRA
Docket/Case #: 13-02793
**Filing date of
arbitration/CFTC reparation
or civil litigation:** 10/01/2013

Customer Complaint Information

Date Complaint Received: 02/07/2013
Complaint Pending? No
Status: Settled
Status Date: 12/16/2013
Settlement Amount: \$10,000.00
**Individual Contribution
Amount:** \$0.00

Disclosure 6 of 6

Reporting Source: Individual
**Employing firm when
activities occurred which led
to the complaint:** WACHOVIA SECURITIES, LLC
Allegations: CLIENT ALLEGES THAT INSTRUCTIONS TO MOVE TO A CASH POSITION ON
9/26/2008 WERE NOT FOLLOWED.
Product Type: Mutual Fund(s)
Alleged Damages: \$18,000.00

Customer Complaint Information

Date Complaint Received: 12/09/2008
Complaint Pending? No
Status: Denied
Status Date: 12/09/2008
Settlement Amount:
**Individual Contribution
Amount:**



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: MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED

Termination Type: Discharged

Termination Date: 09/23/1996

Allegations: Not Provided
IT WAS ALLEGED THAT I PHOTOCOPIED A
SIGNATURE ON AN INFORMAL AGREEMENT

Product Type:

Other Product Types:

Broker Statement TERMINATION
MY SIDE OF THE STORY IS THE ASSISTANTS PAY
WAS NOT BASED UPON THIS A AGREEMENT IN QUESTION. EVERYTHING
ON
THE ALLEGED DOCUMENT IN QUESTION. I PAID ON THE ASSISTANT
THROUGH IN QUESTION NEVER REQUIRED ANY OTHER PAY AND THE
ASSISTANT KNOW ABOUT OUR AGREEMENT TO MERRILL LYNCH.



End of Report

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