



IAPD Report

EDGAR ALLEN THOMAS

CRD# 2231242

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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

EDGAR ALLEN THOMAS (CRD# 2231242)

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 **05/06/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	TUCKER ASSET MANAGEMENT LLC	CRD# 174844	05/02/2025

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **2** 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	COMPOUND PLANNING, INC.	171787	Winter Haven, FL	09/26/2022 - 05/06/2025
IA	CLARAPHI ADVISORY NETWORK, LLC	165868	Winter Haven, FL	08/24/2016 - 12/06/2022
IA	CALTON & ASSOCIATES, INC.	20999	Lakeland, FL	08/28/2013 - 07/29/2016

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

DISCLOSURE INFORMATION

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

Are there events disclosed about this representative?

Yes

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	2
Customer Dispute	2



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

Employment 1 of 1

Firm Name: **TUCKER ASSET MANAGEMENT LLC**

Main Address: 1520 WEST CANAL COURT
SUITE 100
LITTLETON, CO 80120

Firm ID#: 174844

	Regulator	Registration	Status	Date
	Florida	Investment Adviser Representative	Approved	05/06/2025
	Texas	Investment Adviser Representative	Restricted Approval	05/02/2025

Branch Office Locations

TUCKER ASSET MANAGEMENT LLC

141 W. Central Ave.
Suite #3
Winter Haven, FL 33880




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 1 principal/supervisory exam, 3 general industry/product exams, and 2 state securities law exams.




Principal/Supervisory Exams

	Exam	Category	Date
	General Securities Principal Examination (S24)	Series 24	02/02/2008

General Industry/Product Exams

	Exam	Category	Date
	Securities Industry Essentials Examination (SIE)	SIE	07/29/2016
	General Securities Representative Examination (S7)	Series 7	05/15/2004
	Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	05/06/1992

State Securities Law Exams

	Exam	Category	Date
	Uniform Securities Agent State Law Examination (S63)	Series 63	04/21/2007
 	Uniform Combined State Law Examination (S66)	Series 66	05/08/1999

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	09/26/2022 - 05/06/2025	COMPOUND PLANNING, INC.	CRD# 171787	Winter Haven, FL
IA	08/24/2016 - 12/06/2022	CLARAPHI ADVISORY NETWORK, LLC	CRD# 165868	Winter Haven, FL
IA	08/28/2013 - 07/29/2016	CALTON & ASSOCIATES, INC.	CRD# 20999	Lakeland, FL
B	08/19/2013 - 07/29/2016	CALTON & ASSOCIATES, INC.	CRD# 20999	Lakeland, FL
IA	03/18/2013 - 08/23/2013	CL WEALTH MANAGEMENT, LLC	CRD# 164963	NEW YORK, NY
B	12/20/2012 - 08/23/2013	CABOT LODGE SECURITIES LLC	CRD# 159712	TAMPA, FL
IA	09/10/2009 - 06/20/2012	BROOKSTONE INVESTMENT ADVISORY SERVICES	CRD# 13366	LAKELAND, FL
B	08/26/2009 - 06/20/2012	BROOKSTONE SECURITIES, INC.	CRD# 13366	LAKELAND, FL
B	08/24/2009 - 09/17/2009	J.W. COLE FINANCIAL, INC.	CRD# 124583	TAMPA, FL
IA	01/04/2006 - 08/21/2009	INGRAM ADVISORY SERVICES, LLC	CRD# 123508	WINTER HAVEN, FL
IA	01/25/2005 - 08/12/2009	INVESTORS CAPITAL ADVISORY	CRD# 30613	WINTER HAVEN, FL
B	02/18/1999 - 08/12/2009	INVESTORS CAPITAL CORP.	CRD# 30613	WINTER HAVEN, FL
IA	06/10/1999 - 12/31/2004	EASTERN POINT ADVISORS INC.	CRD# 107123	WINTER HAVEN, FL
B	06/26/1996 - 05/28/1997	MCC SECURITIES, INC.	CRD# 36286	TAMPA, FL
B	05/08/1992 - 01/18/1995	PRUCO SECURITIES CORPORATION	CRD# 5685	NEWARK, NJ



Registration & Employment History

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
05/2025 - Present	TUCKER ASSET MANAGEMENT LLC	Investment Adviser Representative	Y	Littleton, CO, United States
10/2005 - Present	THOMAS ADVISORY SERVICES, INC.	PRESIDENT/CEO	Y	Winter Haven, FL, United States
09/2022 - 05/2025	Alternativ Wealth (Compound Planning)	Investment Advisor Representative	Y	New York, NY, United States
08/2016 - 12/2022	CLARAPHI ADVISORY NETWORK, LLC	INVESTMENT ADVISER REPRESENTATIVE	Y	Aliso Viejo, CA, United States
08/2013 - 07/2016	CALTON & ASSOCIATES, INC.	REGISTERED REPRESENTATIVE	Y	TAMPA, FL, 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) THOMAS ADVISORY SERVICES, INC. - 246 SANTA ROSA DRIVE, WINTER HAVEN, FL 33884-3801 (10/2005 to present)
PRESIDENT & CEO: SUB-CHAPTER S CORP TO transfer all commissions, Advisory, and Fixed Insurance Products into, also State Insurance Agency is Registered into this DBA. (This is not Registered, or used as an IAR or RIA Firm), I take a salary from this Corp. based on profitability. Zero Percent of Market time spent on this activity.

June 2022: additional outside business activity through Thomas Advisory Services, Inc. - Documentation consultant. Review and assist senior citizens with completing various documents related to their legal/tax/healthcare matters in coordination with their legal or tax professionals. 8 hours a month spent on this activity; bill hourly for these services; anticipate approximate annual income of \$5,000.

2) Entrust Insurance; INSURANCE AGENT; FIXED INSURANCE PRODUCTS, LIFE INSURANCE, FIXED & FIXED INDEX ANNUITIES, DISABILITY & LONG TERM CARE INSURANCE PRODUCTS.

3) Jack Schroeder and Associates; INSURANCE AGENT; FIXED INSURANCE PRODUCTS, LIFE INSURANCE, FIXED & FIXED INDEX ANNUITIES, DISABILITY & LONG TERM CARE INSURANCE PRODUCTS.

4) The Brokers Network; INSURANCE AGENT; FIXED INSURANCE PRODUCTS, LIFE INSURANCE, FIXED & FIXED INDEX ANNUITIES, DISABILITY & LONG TERM CARE INSURANCE PRODUCTS.

5) Identrion; August 2019; Identity theft protection program offered through AIG. May offer to clients and non-clients and paid a commission. Not securities or insurance related.

6) Midland National Life; August 2019; Life, Health, Fixed insurance.

7) Impact Partner" August 2019; Life, Health, Fixed insurance.

8) DFS Marketing; August 2019; Life, Health, Fixed insurance.

9) Advisors Solutions; August 2019; Life, Health, Fixed insurance.



Disclosure Summary

Disclosure Information

What you should know about reported disclosure events:

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

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

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

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

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

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

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



DISCLOSURE EVENT DETAILS

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

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

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	2
Customer Dispute	2

Regulatory Event

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

Disclosure 1 of 2

Reporting Source:	Individual
Regulatory Action Initiated By:	STATE OF FLORIDA
Sanction(s) Sought:	Civil and Administrative Penalty(ies)/Fine(s)
Date Initiated:	11/06/2013
Docket/Case Number:	142774-13-AG
Employing firm when activity occurred which led to the regulatory action:	BROOKSTONE SECURITIES, INC.
Product Type:	No Product
Allegations:	FAILURE TO DISCLOSE STATE REPORTING ACTION
Current Status:	Final
Resolution:	Stipulation and Consent
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	11/06/2013
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s)

Monetary Sanction 1 of 1



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

Total Amount: \$750.00

Portion Levied against individual: \$750.00

Payment Plan:

Is Payment Plan Current: No

Date Paid by individual: 11/06/2013

Was any portion of penalty waived? No

Amount Waived:

Broker Statement

IN RESPONSE TO THE DISCLOSURE LETTER DETAILS DATED 11/14/2013 AS IT RELATES TO STATE OF FLORIDA SETTLEMENT STIPULATION FOR CONSENT, CASE NUMBER: 142774-13-AG. PLEASE NOTE THAT THE CONSENT TO SETTLEMENT STIPULATION WAS RECEIVED AFTER THE STATE OF FLORIDA INQUIRY ABOUT THE FINAL SETTLEMENT OF THE AUGUST 8 TH, 2012 FINRA ACCEPTANCE OF THE LETTER OF ACCEPTANCE, WAIVER, AND CONSENT IN FINRA'S CASE NUMBER 2010021108002, AS REPORTED ON MY UPDATED U-4. THIS FINRA FINAL SETTLEMENT WAS THE RESULT OF MY THEN BROKER DEALER'S FINRA ROUTINE CYCLE AUDIT IN LATE 2010 THAT QUESTIONED THE VARIABLE ANNUITIES MATERIAL DISCLOSURES AND APPLICATION COMPLETION PROCESS OF ONE OF THE REGISTERED REPRESENTATIVE THAT I WAS SUPERVISING. THIS PERIOD OF TIME WAS FROM OCTOBER 2009 UNTIL THE END OF MAY 2010. AT THAT TIME MY BROKER DEALER WAS UNDER THE SCOPE OF FINRA, AND AS LATER EXPLAINED TO ME, THEY WERE PUTTING EVERYTHING ON THE RADAR, INCLUDING MY SUPERVISION OF THIS REGISTERED REPRESENTATIVE'S VARIABLE ANNUITY PROCEDURES. DURING THE TWO YEARS OF FINRA'S INVESTIGATION, THERE WERE ON THE RECORDS (OTR'S), ONGOING CORRESPONDENCE ON EACH OF THE VARIABLE ANNUITIES CONTRACTS IN QUESTION, AND ADDITIONAL SEPARATE BROKER DEALER MATTERS PRIOR TO THE FINRA ORDERING THE BROKER DEALER TO CLOSE FOR BUSINESS IN JUNE OF 2012. THIS RESULTED IN ME HAVING TO LOCATE ANOTHER BROKER DEALER TO AFFILIATE WITH, WHICH WAS NOT ACCOMPLISHED UNTIL NOVEMBER 2012. HOWEVER IN THAT SAME MONTH OF NOVEMBER 2012, AND AGAIN IN DECEMBER 2012, I UNDERWENT TWO SEPARATE MAJOR SURGERIES RESULTING IN LENGTHY RECOVERIES, AND DOCTOR FOLLOW UPS. MEANWHILE SOMETIME IN JANUARY OR FEBRUARY OF 2012, THE STATE OF FLORIDA RELEASED OF STATUTE CHANGE REQUIRING ANY ADMINISTRATION ACTIONS TAKEN AGAINST ANY STATE LICENSED AGENTS HAD TO BE REPORTED WITHIN THIRTY DAYS. UNANNOUNCED TO ME DURING THAT TIME AND WITH THE EVENTS BEING ONGOING WITH FINRA, AND THE CLOSING OF MY BROKER DEALER, ALONG WITH ME TRYING TO RECOVER MY HEALTH, AND LOCATE A NEW AFFILIATION WITH ANOTHER BROKER DEALER, IT WAS NEVER BOUGHT TO MY ATTENTION THAT THE AUGUST 2012 SETTLEMENT WITH FINRA'S CASE NUMBER 010021108002 NEEDED TO BE REPORTED TO MY RESIDENT STATES DEPARTMENT OF FINANCE. UP TO THIS POINT IN TIME I WAS ONLY AWARE OF A THIRTY DAY TIME FRAME, OR IMMEDIATELY UPON AFFILIATING WITH ANOTHER BROKER DEALER MEMBER TO UPDATE MY U-4. I CONSENTED TO THE STIPULATION OF THE STATE OF FLORIDA FOR EXPEDIENT, AND ECONOMICAL REASONS, AND ON THE INSTRUCTIONS OF MY CURRENT BROKER DEALER COMPLIANCE DEPARTMENT. FURTHERMORE, IF



KNOWINGLY, I WOULD NEVER INTENTIONALLY FAIL TO REPORT ANY ACTIONS TAKING AGAINST ME TO THE STATE OF FLORIDA, OR ANY OTHER AGENCY.

Disclosure 2 of 2

Reporting Source: Regulator

Regulatory Action Initiated By: FINRA

Sanction(s) Sought: Other: N/A

Date Initiated: 08/08/2012

Docket/Case Number: [2010021108002](#)

Employing firm when activity occurred which led to the regulatory action: BROOKSTONE SECURITIES, INC.

Product Type: Annuity-Variable

Allegations: FINRA RULES 2010, 2330(C), NASD RULES 2821(C), 3010(A) - EDGAR THOMAS FAILED TO REASONABLY SUPERVISE A REGISTERED REPRESENTATIVE WITH HIS MEMBER FIRM WHO RECOMMENDED DEFERRED VARIABLE ANNUITY PURCHASES OR EXCHANGES TO CUSTOMERS WITHOUT HAVING A REASONABLE BASIS TO BELIEVE THAT THE CUSTOMER HAD BEEN INFORMED OF THE POTENTIAL SURRENDER PERIOD AND SURRENDER CHARGES ASSOCIATED WITH THE DEFERRED VARIABLE ANNUITIES OR THE POTENTIAL CHARGES FOR AND FEATURES OF RIDERS ASSOCIATED WITH THE ANNUITIES. THOMAS FAILED TO REASONABLY RESPOND TO THE INACCURATE INFORMATION THAT THE REPRESENTATIVE PROVIDED TO CUSTOMERS IN THE FIRM'S DEFERRED VARIABLE ANNUITY DISCLOSURE FORMS AND RATHER THAN REQUIRE CORRECTION OF THE MISINFORMATION, THOMAS ACCEPTED THE REPRESENTATIVE'S EXPLANATION THAT THE CUSTOMERS FULLY UNDERSTOOD THE TERMS OF THE DEFERRED VARIABLE ANNUITIES.

Current Status: Final

Resolution: Acceptance, Waiver & Consent(AWC)

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

Resolution Date: 08/08/2012

Sanctions Ordered: Civil and Administrative Penalty(ies)/Fine(s)
Suspension

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? No



(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?

(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

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

Sanction 1 of 1

Sanction Type:	Suspension
Capacities Affected:	ANY PRINCIPAL CAPACITY
Duration:	10 BUSINESS DAYS
Start Date:	08/20/2012



End Date: 08/31/2012

Monetary Sanction 1 of 1

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

Total Amount: \$5,000.00

Portion Levied against individual: \$5,000.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual: 11/27/2012

Was any portion of penalty waived? No

Amount Waived:

Regulator Statement

WITHOUT ADMITTING OR DENYING THE FINDINGS, THOMAS CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, HE IS FINED \$5,000 AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY PRINCIPAL CAPACITY FOR 10 BUSINESS DAYS. THE FINE IS DUE AND PAYABLE EITHER IMMEDIATELY UPON REASSOCIATION WITH A MEMBER FIRM FOLLOWING THE SUSPENSION OR PRIOR TO ANY REQUEST FOR RELIEF FROM ANY STATUTORY DISQUALIFICATION RESULTING FROM THIS OR ANY OTHER EVENT OR PROCEEDING, WHICHEVER IS EARLIER. THE SUSPENSION IS IN EFFECT FROM AUGUST 20, 2012 THROUGH AUGUST 31, 2012. FINE PAID IN FULL ON 11/27/2012.

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Reporting Source: Individual

Regulatory Action Initiated By: FINRA

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

Date Initiated: 08/08/2012

Docket/Case Number: [2010021108002](#)

Employing firm when activity occurred which led to the regulatory action: BROOKSTONE SECURITIES, INC.

Product Type: Annuity-Variable

Allegations: FINRA RULES 2010, 2330(C), NASD RULES 2821(C), 3010(A) - EDGAR ALLEN THOMAS FAILED TO REASONABLY SUPERVISE A REGISTERED REPRESENTATIVE WITH HIS MEMBER FIRM WHO RECOMMENDED DEFERRED VARIABLE ANNUITY PURCHASES OR EXCHANGES TO CUSTOMERS WITHOUT HAVING A REASONABLE BASIS TO BELIEVE THAT THE CUSTOMER HAD BEEN INFORMED OF THE POTENTIAL SURRENDER PERIOD AND SURRENDER CHARGES ASSOCIATED WITH THE ANNUITIES. THOMAS FAILED TO REASONABLY RESPOND TO THE INACCURATE INFORMATION THAT THE REPRESENTATIVE PROVIDED THE CUSTOMERS IN THE FIRM'S DEFERRED VARIABLE ANNUITY DISCLOSURE FORMS AND RATHER THAN REQUIRE CORRECTION OF THE MISINFORMATION, THOMAS



	ACCEPTED THE REPRESENTATIVE'S EXPLANATION THAT THE CUSTOMERS FULLY UNDERSTOOD THE TERMS OF THE DEFERRED VARIABLE ANNUITIES.
Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	08/08/2012
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	ANY PRINCIPAL CAPACITY
Duration:	10 BUSINESS DAYS
Start Date:	08/20/2012
End Date:	08/31/2012
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$5,000.00
Portion Levied against individual:	\$5,000.00
Payment Plan:	
Is Payment Plan Current:	
Date Paid by individual:	11/27/2012
Was any portion of penalty waived?	No
Amount Waived:	
Broker Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THOMAS CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF THE FINDINGS. THEREFORE HE IS FINED \$5,000.00 AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY PRINCIPAL CAPACITY FOR 10 BUSINESS DAYS. THE FINE IS DUE AND PAYABLE EITHER IMMEDIATELY UPON REASSOCIATION WITH A MEMBER FIRM FOLLOWING THE SUSPENSION OR PRIOR TO ANY REQUEST FROM RELIEF FROM ANY STATUTORY DISQUALIFICATION RESULTING FROM THIS OR ANY OTHER EVENT OR PROCEEDING, WHICHEVER IS EARLIER. THE SUSPENSION WAS IN EFFECT FROM AUGUST 8, 2012 THROUGH AUGUST 31, 2012. THE FINE WAS PAID IN FULL ON 11/27/2012.



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:	Individual
Employing firm when activities occurred which led to the complaint:	Claraphi Advisory Network
Allegations:	The Clients' son claims that the brokerage CD his parents invested was wrong for them and that they should not have been charged any management fees.
Product Type:	CD
Alleged Damages:	\$48,753.60
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:	10/16/2017
Complaint Pending?	No
Status:	Closed/No Action
Status Date:	09/27/2018
Settlement Amount:	\$0.00
Individual Contribution Amount:	\$0.00
Broker Statement	I strongly disagree that the clients (husband and wife) purchased an unsuitable or inappropriate investment. They were properly informed, verbally in two meetings and via written prospectus as well, of the terms and risks of the JP Morgan CD they purchased. They were expressly aware of the liquidity provisions, and of the particular benefits of purchasing the CD in a Revocable Trust. This complaint, being furthered by their son, is without merit.

Disclosure 2 of 2

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Investors Capital Corp.
Allegations:	Suitability of investments made between 2008-2012.
Product Type:	Real Estate Security
Alleged Damages:	\$110,000.00



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 #: 16-00818

Filing date of
arbitration/CFTC reparation
or civil litigation: 03/21/2016

Customer Complaint Information

Date Complaint Received: 03/29/2016

Complaint Pending? Yes

Settlement Amount:

Individual Contribution
Amount:

Firm Statement Matter relates to historical investments made through two RRs.

Reporting Source: Individual

Employing firm when
activities occurred which led
to the complaint: Investors Capital Corp

Allegations: Suitability of Investments made between 2008 - 2012

Product Type: Real Estate Security

Alleged Damages: \$110,000.00

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 #: 16-00818

Filing date of
arbitration/CFTC reparation
or civil litigation: 03/21/2016

Customer Complaint Information

Date Complaint Received: 04/28/2016

Complaint Pending? No

Status: Settled

Status Date: 05/19/2017

Settlement Amount: \$43,500.00



**Individual Contribution
Amount:**

\$0.00

Broker Statement

I was not named in this complaint. However, I generally deny the allegations therein, and to the extent any of those allegations suggest or reflect upon my personal conduct, I expressly deny those as well. The complaint alleges conduct which transpired nearly 7 years ago. I was not asked to, and did not participate in, the defense, negotiation or settlement of this matter. Likewise, I was not asked to and did not provide any financial contribution toward its resolution.



End of Report

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