



## IAPD Report

# GREGORY RUSSELL BROWN

CRD# 2233684

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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

### GREGORY RUSSELL BROWN (CRD# 2233684)

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 **03/15/2024**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	WEST COAST CAPITAL MANAGEMENT, LLC	CRD# 141981	11/29/2006

### QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **3** 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	JONATHAN ROBERTS FINANCIAL GROUP, INC.	46285	TAMPA, FL	07/03/2002 - 07/14/2003
B	ESTREET SECURITIES, INC.	42678	TEMPE, AZ	10/22/2001 - 06/28/2002
B	INTERSECURITIES, INC.	16164	PHILADELPHIA, PA	09/27/1995 - 10/22/2001

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
Investigation	1
Customer Dispute	9
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 **3** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

#### Employment 1 of 1

Firm Name: **WEST COAST CAPITAL MANAGEMENT, LLC**  
Main Address: 1176 E WARNER RD  
SUITE 218  
GILBERT, AZ 85296  
Firm ID#: 141981

Regulator	Registration	Status	Date
IA Arizona	Investment Adviser Representative	Approved	11/29/2006
IA California	Investment Adviser Representative	Approved	01/22/2015
IA Oregon	Investment Adviser Representative	Approved	09/06/2012

#### Branch Office Locations

**WEST COAST CAPITAL MANAGEMENT, LLC**  
1176 E WARNER RD  
SUITE 218  
GILBERT, AZ 85296



## 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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General Securities Representative Examination (S7)	Series 7	12/05/2000
Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	09/26/1995

#### State Securities Law Exams

Exam	Category	Date
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Uniform Investment Adviser Law Examination (S65)	Series 65	09/01/2006
Uniform Securities Agent State Law Examination (S63)	Series 63	10/13/1995

### PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **0** professional designation(s).

No information reported.



## Registration & Employment History

### PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
B	07/03/2002 - 07/14/2003	JONATHAN ROBERTS FINANCIAL GROUP, INC.	CRD# 46285	TAMPA, FL
B	10/22/2001 - 06/28/2002	ESTREET SECURITIES, INC.	CRD# 42678	TEMPE, AZ
B	09/27/1995 - 10/22/2001	INTERSECURITIES, INC.	CRD# 16164	PHILADELPHIA, PA

### 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
09/2006 - Present	WEST COAST CAPITAL MANAGEMENT	PRESIDENT	Y	PHOENIX, AZ, United States
09/2006 - Present	WEST COAST FINANCIAL SERVICES	PRESIDENT	N	PHOENIX, AZ, 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.

SELL INSURANCE PRODUCTS SINCE 1987



## 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	9
Investigation	1
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 2

<b>Reporting Source:</b>	Individual
<b>Regulatory Action Initiated By:</b>	ARIZONA CORPORATE COMMISSION
<b>Sanction(s) Sought:</b>	Cease and Desist
<b>Other Sanction(s) Sought:</b>	ORDER FOR ADMINISTRATIVE PENALTIES ORDER OF REVOCATION
<b>Date Initiated:</b>	06/29/2004
<b>Docket/Case Number:</b>	S-03482A-03-0000
<b>Employing firm when activity occurred which led to the regulatory action:</b>	INTERSECURITIES, INC.
<b>Product Type:</b>	Other
<b>Other Product Type(s):</b>	ETS & ALPHA TELECOM EQUIPMENT LEASING
<b>Allegations:</b>	SOLD UNREGISTERED SECURITIES.
<b>Current Status:</b>	Final
<b>Resolution:</b>	Settled
<b>Resolution Date:</b>	09/01/2005
<b>Sanctions Ordered:</b>	Monetary/Fine \$7,500.00 Revocation/Expulsion/Denial



**Other Sanctions Ordered:** MONETARY FINE OF \$7500.00  
REVOCATION OF SECURITIES SALES

**Sanction Details:** REVOCATION OF SECURITIES SALES AS OF 6-29-2004. NO TIME WAS SPECIFIED AND PER ARIZONA COPORATE COMMISSION FREE TO REAPPLY FOR SECURITIES LICENSES AT ANY TIME.

**Disclosure 2 of 2**

**Reporting Source:** Regulator

**Regulatory Action Initiated By:** ARIZONA CORPORATION COMMISSION, SECURITIES DIVISION - PAM JOHNSON (602) 542-4242

**Sanction(s) Sought:** Revocation

**Other Sanction(s) Sought:** CEASE AND DESIST, ADMINISTRATIVE PENALTIES, AND RESTITUTION

**Date Initiated:** 05/06/2003

**Docket/Case Number:** S-03482A-03-0000

**Employing firm when activity occurred which led to the regulatory action:** INTERSECURITIES INC

**Product Type:** Other

**Other Product Type(s):** PAYPHONE INVESTMENT CONTRACTS, SALE & LEASEBACK AGREEMENTS, SALE & SERVICE AGREEMENTS

**Allegations:** SALE OF UNREGISTERED SECURITIES

**Current Status:** Final

**Resolution:** 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:** 06/29/2004

**Sanctions Ordered:** Cease and Desist/Injunction  
Disgorgement/Restitution  
Monetary/Fine \$7,500.00  
Revocation/Expulsion/Denial

**Other Sanctions Ordered:** RESPONDENT ENTERED ORDER TO CEASE AND DESIST, ORDER OF RESTITUTION, ORDER FOR ADMINISTRATIVE PENALTIES, ORDER OF REVOCATION AND CONSENT TO SAME

**Sanction Details:** \$230,000 RESTITUTION + INTEREST OF 5% PER ANNUM FROM THE DATE OF THE ORDER UNTIL PAID IN FULL - PAYMENT OF \$1,000 DUE ON THE DATE OF THE ORDER, THE REMAINING PENALTY (\$6,500) IS SUBORDINATE TO PAYMENT OF RESTITUTION

**Regulator Statement** 49 INVESTORS INVESTED APPROXIMATELY \$2,752,850 IN ETS PAYPHONES, PHOENIX TELECOM AND ALPHA TELECOM UNREGISTERED SECURITIES FROM MAY 2000 THROUGH APRIL 2001

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**Reporting Source:** Firm

**Regulatory Action Initiated By:** ARIZONA CORPORATION COMMISSION, SECURITIES DIVISION

**Sanction(s) Sought:** Revocation

**Other Sanction(s) Sought:** CEASE AND DESIST, ADMINISTRATIVE PENALTIES, AND RESTITUTION

**Date Initiated:** 05/06/2003

**Docket/Case Number:** S-03482A-03-0000

**Employing firm when activity occurred which led to the regulatory action:** INTERSECURITIES, INC.

**Product Type:** Other

**Other Product Type(s):** PAYPHONE INVESTMENT CONTRACTS, SALE & LEASEBACK AGREEMENTS, SALE & SERVICE AGREEMENTS

**Allegations:** SALE OF UNREGISTERED SECURITIES

**Current Status:** Final

**Resolution:** Consent

**Resolution Date:** 06/29/2004

**Sanctions Ordered:** Cease and Desist/Injunction  
Disgorgement/Restitution  
Monetary/Fine \$7,500.00  
Revocation/Expulsion/Denial

**Other Sanctions Ordered:** REGISTERED REPRESENTATIVE ENTERED ORDER TO CEASE AND DESIST, ORDER OF RESTITUTION, ORDER FOR ADMINISTRATIVE PENALTIES, ORDER OF REVOCATION AND CONSENT TO SAME.

**Sanction Details:** \$230,000 RESTITUTION AND INTEREST OF 5% PER ANNUM FROM THE DATE OF THE ORDER UNTIL PAID IN FULL - PAYMENT OF \$1,000 DUE ON THE DATE OF THE ORDER, THE REMAINING PENALTY (\$6,500) IS SUBORDINATE TO PAYMENT OF RESTITUTION.

**Firm Statement** 49 INVESTORS INVESTED APPROXIMATELY \$2,752,850 IN ETS PAYPHONES, PHOENIX TELECOM AND ALPHA TELECOM UNREGISTERED SECURITIES FROM MAY 2000 THROUGH APRIL 2001.

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**Reporting Source:** Firm

**Regulatory Action Initiated By:** ARIZONA CORPORATION COMMISSION

**Sanction(s) Sought:** Civil and Administrative Penalt(ies) /Fine(s)

**Other Sanction(s) Sought:** RESTITUTION

**Date Initiated:** 05/06/2003

**Docket/Case Number:** S-03482A-03-0000

**Employing firm when activity occurred which led to the regulatory action:** INTERSECURITIES



<b>Product Type:</b>	Other
<b>Other Product Type(s):</b>	PAY TELEPHONE CONTRACTS
<b>Allegations:</b>	VIOLATIONS OF A.R.S. SS 44-1841, 1991,1961, AND 1962 INVOLVING PAYPHONE "BUSINESS OPPORTUNITIES"
<b>Current Status:</b>	Pending



## Investigation

This disclosure event involves any ongoing formal investigation such as a grand jury investigation, a Securities and Exchange Commission investigation, a formal investigation by a self-regulatory organization (e.g., FINRA), or an action or procedure designated as an investigation by a state or other regulator. Subpoenas, preliminary or routine regulatory inquiries, and general requests by these regulatory bodies for information are not considered investigations and therefore are not required to be reported.

### Disclosure 1 of 1

**Reporting Source:** Individual

**Initiated By:** ARIZONA CORPORATION COMMISSION

**Notice Date:** 04/09/2002

**Details:** INVESTIGATION IS REGARDING THE SALE OF PAY TELEPHONES BY MR. BROWN. TO DATE, THEIR HAS BEEN NO FINDING OR NOTICE OF WRONGDOING.



## 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 9

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** INTERSECURITIES, INC.

**Allegations:** CLIENT ALLEGES THAT THE REPRESENTATIVE MISREPRESENTED THE PAYPHONE INVESTMENTS HE MADE AS BEING "SAFE AND LEGAL" AND THAT THEY HAD BEEN APPROVED BY HIS SUPERIORS. THE INVESTMENTS WERE MADE IN OCTOBER 1999

**Product Type:** Other

**Other Product Type(s):** PAYPHONE LEASE AGREEMENTS

**Alleged Damages:** \$22,688.00

### Customer Complaint Information

**Date Complaint Received:** 12/15/2004

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 02/04/2005

**Settlement Amount:** \$15,000.00

**Individual Contribution Amount:** \$0.00

**Firm Statement** THIS COMPLAINT WAS THE RESULT OF A CLAIM RESOLUTION PROCESS INVOLVING THE ARIZONA CORPORATION COMMISSION AND AZ RESIDENTS WHO PURCHASED PAYPHONE INVESTMENTS SOLD BY GREG BROWN. THE CLAIMS PROCESSING FORM WAS RETURNED WITH NOTES THAT CONSTITUTED A CUSTOMER COMPLAINT.

### Disclosure 2 of 9

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** INTERSECURITIES, INC.

**Allegations:** THE CLIENT ALLEGES THAT THE REPRESENTATIVE GUARANTEED A FIXED RATE OF RETURN ON THE PAYPHONE INVESTMENTS THEY PURCHASED IN FEBRUARY 2000.

**Product Type:** Other

**Other Product Type(s):** PAYPHONE LEASE AGREEMENTS

**Alleged Damages:** \$13,180.00

**Customer Complaint Information****Date Complaint Received:** 12/27/2004**Complaint Pending?** No**Status:** Settled**Status Date:** 02/11/2005**Settlement Amount:** \$6,000.00**Individual Contribution Amount:** \$0.00**Firm Statement** THIS COMPLAINT WAS THE RESULT OF A CLAIM RESOLUTION PROCESS INVOLVING THE ARIZONA CORPORATION COMMISSION AND AZ RESIDENTS WHO PURCHASED PAYPHONE INVESTMENTS SOLD BY GREG BROWN. THE CLAIMS PROCESSING FORM WAS RETURNED WITH NOTES THAT CONSTITUTED A CUSTOMER COMPLAINT.**Disclosure 3 of 9****Reporting Source:** Firm**Employing firm when activities occurred which led to the complaint:** INTERSECURITIES, INC.**Allegations:** THE CLIENTS ALLEGE THAT THE REPRESENTATIVE MISREPRESENTED THE PAYPHONE INVESTMENTS THEY PURCHASED AS BEING A "GOOD INVESTMENT" AND ALSO ALLEGES NEGLIGENCE, AIDING AND ABETTING AND CONSUMER FRAUD. THE INVESTMENTS WERE MADE IN FEBRUARY AND APRIL 2000.**Product Type:** Other**Other Product Type(s):** PAYPHONE LEASE AGREEMENTS**Alleged Damages:** \$100,020.80**Customer Complaint Information****Date Complaint Received:** 01/20/2005**Complaint Pending?** No**Status:** Settled**Status Date:** 05/09/2005**Settlement Amount:** \$70,000.00**Individual Contribution Amount:** \$0.00**Firm Statement** THIS COMPLAINT WAS THE RESULT OF A CLAIM RESOLUTION PROCESS INVOLVING THE ARIZONA CORPORATION COMMISSION AND AZ RESIDENTS WHO PURCHASED PAYPHONE INVESTMENTS SOLD BY GREG BROWN. THE CLAIMS PROCESSING FORM WAS RETURNED WITH NOTES THAT CONSTITUTED A CUSTOMER COMPLAINT. COMPLAINT SETTLED FOR \$70,000.**Disclosure 4 of 9****Reporting Source:** Firm



**Employing firm when activities occurred which led to the complaint:** INTERSECURITIES, INC.

**Allegations:** CLIENT ALLEGES THAT THE REPRESENTATIVE MISREPRESENTED THE PAYPHONE INVESTMENTS HE PURCHASED IN APRIL 2000.

**Product Type:** Other

**Other Product Type(s):** PAYPHONE LEASE AGREEMENTS

**Alleged Damages:** \$13,692.07

### Customer Complaint Information

**Date Complaint Received:** 12/08/2004

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 01/25/2005

**Settlement Amount:** \$5,000.00

**Individual Contribution Amount:** \$0.00

**Firm Statement** THIS COMPLAINT WAS THE RESULT OF A CLAIM RESOLUTION PROCESS INVOLVING THE ARIZONA CORPORATION COMMISSION AND AZ RESIDENTS WHO PURCHASED PAYPHONE INVESTMENTS SOLD BY GREG BROWN. THE CLAIMS PROCESSING FORM WAS RETURNED WITH NOTES THAT CONSTITUTED A CUSTOMER COMPLAINT.

### Disclosure 5 of 9

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** INTERSECURITIES, INC.

**Allegations:** CLIENT ALLEGES THAT THE REPRESENTATIVE MISREPRESENTED THE PAYPHONE INVESTMENTS SHE PURCHASED AS BEING "A NO LOSE PROPOSITION". THE INVESTMENTS WERE MADE IN FEBRUARY AND JUNE 2000.

**Product Type:** Other

**Other Product Type(s):** PAYPHONE LEASE AGREEMENTS

**Alleged Damages:** \$13,891.54

### Customer Complaint Information

**Date Complaint Received:** 01/27/2005

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 03/18/2005

**Settlement Amount:** \$9,000.00

**Individual Contribution Amount:** \$0.00



**Firm Statement** THIS COMPLAINT WAS THE RESULT OF A CLAIM RESOLUTION PROCESS INVOLVING THE ARIZONA CORPORATION COMMISSION AND AZ RESIDENTS WHO PURCHASED PAYPHONE INVESTMENTS SOLD BY GREG BROWN. THE CLAIMS PROCESSING FORM WAS RETURNED WITH NOTES THAT CONSTITUTED A CUSTOMER COMPLAINT. THE COMPLAINT HAS BEEN SETTLED FOR \$9,000.

#### Disclosure 6 of 9

**Reporting Source:** Firm  
**Employing firm when activities occurred which led to the complaint:** INTERSECURITIES, INC.

**Allegations:** THE CLIENT ALLEGES THAT THE REPRESENTATIVE "SWINDLED" HER IN REGARDS TO PAYPHONE INVESTMENTS SHE MADE IN NOVEMBER 1999.

**Product Type:** Other

**Other Product Type(s):** PAYPHONE LEASE AGREEMENTS

**Alleged Damages:** \$78,078.29

#### Customer Complaint Information

**Date Complaint Received:** 01/18/2005

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 02/24/2005

**Settlement Amount:** \$43,000.00

**Individual Contribution Amount:** \$0.00

**Firm Statement** THIS COMPLAINT WAS THE RESULT OF A CLAIM RESOLUTION PROCESS INVOLVING THE ARIZONA CORPORATION COMMISSION AND AZ RESIDENTS WHO PURCHASED PAYPHONE INVESTMENTS SOLD BY GREG BROWN. THE CLAIMS PROCESSING FORM WAS RETURNED WITH NOTES THAT CONSTITUTED A CUSTOMER COMPLAINT.

#### Disclosure 7 of 9

**Reporting Source:** Firm  
**Employing firm when activities occurred which led to the complaint:** INTERSECURITIES, INC.

**Allegations:** BETWEEN DECEMBER 1999 AND MARCH 2000 THE REGISTERED REPRESENTATIVE SOLD PAYPHONE CONTRACTS TO THE CUSTOMERS LISTED ABOVE IN ITEM 1. THE CUSTOMERS NOW ALLEGE CLAIMS OF BREACH OF FIDUCIARY DUTY, SUITABILITY & VIOLATION OF ARIZONA SECURITIES ACT.

**Product Type:** Other

**Other Product Type(s):** PAYPHONES

**Alleged Damages:** \$274,000.00

#### Customer Complaint Information

**Date Complaint Received:****Complaint Pending?****Status:** Arbitration/Reparation**Status Date:** 06/02/2004**Settlement Amount:****Individual Contribution Amount:****Arbitration Information****Arbitration/Reparation Claim filed with and Docket/Case No.:** NASD ARBITRATION CASE #04-03535**Date Notice/Process Served:** 06/02/2004**Arbitration Pending?** No**Disposition:** Settled**Disposition Date:** 05/23/2005**Monetary Compensation Amount:** \$192,000.00**Individual Contribution Amount:** \$0.00**Firm Statement** ARBITRATION SETTLED.**Disclosure 8 of 9****Reporting Source:** Firm**Employing firm when activities occurred which led to the complaint:** INTERSECURITIES, INC.**Allegations:** CLIENTS ALLEGE THAT THE REPRESENTATIVE SOLD THEM A TOTLA OF \$86,000.00 IN ETS & ALPHA TELECOM PAYPHONE INVESTMENTS VIOLATING FEDERAL & ARIZONIA SECURITIES LAWS, BREACH OF CONTACT, COMMON LAW FRAUD, BREACH OF FIDUCIARY DUTY NEGLIGENCE & GROSS NEGLIGENCE.**Product Type:** Other**Other Product Type(s):** PAYPHONES**Alleged Damages:** \$86,000.00**Customer Complaint Information****Date Complaint Received:** 01/29/2004**Complaint Pending?** No**Status:** Arbitration/Reparation**Status Date:** 01/29/2004**Settlement Amount:****Individual Contribution Amount:**

**Arbitration Information**

**Arbitration/Reparation Claim filed with and Docket/Case No.:** NASD ARBITRATION CASE NUMBER: 04-00095

**Date Notice/Process Served:** 01/29/2004

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 07/18/2005

**Monetary Compensation Amount:** \$236,371.02

**Individual Contribution Amount:** \$0.00

**Firm Statement** NASD ARBITRATION WAS SETTLED WITH THE CLIENTS.

**Disclosure 9 of 9**

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** INTERSECURITIES, INC.

**Allegations:** THE CLIENTS ALLEGE BREACH OF FIDUCIARY DUTY, FRAUD, SUITABILITY, NEGLIGENT SUPERVISION AND VIOLATION OF ARIZONA SECURITIES ACT DUE TO THE ALLEGED SALE OF INTERESTS IN PAYPHONE CONTRACTS.

**Product Type:** Other

**Other Product Type(s):** PAYPHONES

**Alleged Damages:** \$126,000.00

**Customer Complaint Information**

**Date Complaint Received:** 02/15/2002

**Complaint Pending?** No

**Status:** Arbitration/Reparation

**Status Date:** 04/16/2003

**Settlement Amount:**

**Individual Contribution Amount:**

**Arbitration Information**

**Arbitration/Reparation Claim filed with and Docket/Case No.:** NASD ARBITRATION CASE #0200153

**Date Notice/Process Served:** 01/29/2002

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 04/16/2003



**Monetary Compensation Amount:** \$110,000.00

**Individual Contribution Amount:** \$0.00

**Firm Statement** THE COMPLAINT WAS SETTLED THROUGH NASD ARBITRATION.

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**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** INTERSECURITIES, INC.

**Allegations:** EACH CLAIMANT ALLEGES THAT: (1.) THEY WERE SOLD UNREGISTERED SECURITIES OF A COMPANY CALLED ETS PAYPHONES, INC. ("ETS");(2.)THE INVESTMENT WAS "UNSUITABLE";(3.)RESPONDENTS: (A) COMMITTED FRAUD (B)FAILED TO FULFILL THEIR FIDUCIARY DUTIES (C)MISREPRESENTATED MATERIAL FACTS AND (D)INTERSECURITIES, INC. FAILED TO SUPERVISE. CLAIMANTS MADE PURCHASES OF ETS PAYPHONES FROM 11/30/1999 TO 03/25/2000. INTERSECURITIES, INC. GAVE ME PERMISSION TO SELL ETS PAYPHONES AS AN OUTSIDE BUSINESS ACTIVITY. I CALLED THE ARIZONA SECURITIES COMMISSION TO ASK IF SELLING ETS PAYPHONES WOULD BE CONSIDERED SELLING SECURITIES. I WAS TOLD IT WOULD NOT. BASED UPON THE COMMENTS OF THE STATE AND INTERSECURITIES, I BELIEVED THAT SELLING ETS PAYPHONES WAS AN ACCEPTABLE ACTIVITY. I BEGAN AN EXTENSIVE DUE DILIGENCE INVESTIGATION OF THE COMPANY INCLUDING AN ON-SITE INSPECTION. CLAIMANTS ALLEGATIONS OF FRAUD, MISREPRETATION, UNSUITABILITY, AND BREACH OF FIDUCIARY DUTY ARE COMPLETELY UNTRUE.

**Product Type:** No Product

**Other Product Type(s):** DIRECT OWNERSHIP OF INDIVIDUAL PAYPHONES.

**Alleged Damages:** \$126,000.00

### Customer Complaint Information

**Date Complaint Received:** 02/11/2002

**Complaint Pending?** No

**Status:** Arbitration/Reparation

**Status Date:** 04/22/2003

**Settlement Amount:**

**Individual Contribution Amount:**

### Arbitration Information

**Arbitration/Reparation Claim filed with and Docket/Case No.:** NASD-DR CASE NUMBER 02-00153

**Date Notice/Process Served:** 02/11/2002

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 04/22/2003

**Monetary Compensation** \$115,000.00



**Amount:**

**Individual Contribution**            \$0.00

**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:** Firm  
**Firm Name:** JONATHAN ROBERTS FINANCIAL GROUP, INC.  
**Termination Type:** Voluntary Resignation  
**Termination Date:** 07/14/2003  
**Allegations:** THE ARIZONA CORPORATION COMMISSION ALLEDGES MR. BROWN VIOLATED A.R.S. SS 44-1841, 1991, 1961, AND 1962 INVOLVING PAYHONE "BUSINESS OPPORTUNITIES"  
**Product Type:** Other  
**Other Product Types:** PAY TELEPHONES

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**Reporting Source:** Individual  
**Firm Name:** JONATHAN ROBERTS FINANCIAL GROUP  
**Termination Type:** Voluntary Resignation  
**Termination Date:** 06/01/2003  
**Allegations:** ORDER FROM ARIZONA CORPORATE COMMISSION  
**Product Type:** Other  
**Other Product Types:** ETS AND ALPHA TELECOM EQUIPMENT LEASING



## End of Report

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