IAPD Report

TODD LORING LUFT

CRD# 2310647

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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

TODD LORING LUFT (CRD# 2310647)

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 **04/30/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC	CRD# 144426	04/24/2024

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
B	B. RILEY WEALTH MANAGEMENT	2543	THE WOODLANDS, TX	02/27/2023 - 04/25/2024
IA	B. RILEY WEALTH ADVISORS, INC.	115927	The Woodlands, TX	02/24/2023 - 04/25/2024
B	AMERIPRISE FINANCIAL SERVICES, LLC	6363	THE WOODLANDS, TX	08/26/2016 - 02/28/2023

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	2
Judgment/Lien	5

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: **INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC**

Main Address: 111 NORTH ORANGE AVENUE
SUITE 1000
ORLANDO, FL 32801

Firm ID#: 144426

	Regulator	Registration	Status	Date
IA	Texas	Investment Adviser Representative	Approved	04/24/2024

Branch Office Locations

INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC
The Woodlands, TX

 Report about TODD LORING LUFT.

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, 3 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

	Exam	Category	Date
	No information reported.		

General Industry/Product Exams

	Exam	Category	Date
B	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
B	National Commodity Futures Examination (S3)	Series 3	03/17/1998
B	General Securities Representative Examination (S7)	Series 7	04/28/1993

State Securities Law Exams

	Exam	Category	Date
IA	Uniform Investment Adviser Law Examination (S65)	Series 65	11/28/1997
B	Uniform Securities Agent State Law Examination (S63)	Series 63	03/04/1993

PROFESSIONAL DESIGNATIONS

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

No information reported.

Only professional designations listed in Question 8 of the Form U4 will appear in this section if the appropriate box is checked and verified by the issuing organization at the time of the filing. Learn more about eligible designations at IARD and NASAA.

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	02/27/2023 - 04/25/2024	B. RILEY WEALTH MANAGEMENT	CRD# 2543	THE WOODLANDS, TX
IA	02/24/2023 - 04/25/2024	B. RILEY WEALTH ADVISORS, INC.	CRD# 115927	The Woodlands, TX
B	08/26/2016 - 02/28/2023	AMERIPRISE FINANCIAL SERVICES, LLC	CRD# 6363	THE WOODLANDS, TX
IA	08/26/2016 - 02/28/2023	AMERIPRISE FINANCIAL SERVICES, LLC	CRD# 6363	THE WOODLANDS, TX
B	10/14/2010 - 09/06/2016	UBS FINANCIAL SERVICES INC.	CRD# 8174	HOUSTON, TX
IA	10/14/2010 - 09/06/2016	UBS FINANCIAL SERVICES INC.	CRD# 8174	HOUSTON, TX
B	06/01/2009 - 10/21/2010	MORGAN STANLEY SMITH BARNEY	CRD# 149777	HOUSTON, TX
IA	06/01/2009 - 10/21/2010	MORGAN STANLEY SMITH BARNEY LLC	CRD# 149777	HOUSTON, TX
B	04/02/2007 - 06/01/2009	MORGAN STANLEY & CO. INCORPORATED	CRD# 8209	HOUSTON, TX
IA	04/02/2007 - 06/01/2009	MORGAN STANLEY & CO. INCORPORATED	CRD# 8209	HOUSTON, TX
IA	05/28/2004 - 04/02/2007	MORGAN STANLEY	CRD# 7556	HOUSTON, TX
B	05/28/2004 - 04/02/2007	MORGAN STANLEY DW INC.	CRD# 7556	HOUSTON, TX
B	08/02/1994 - 06/11/2004	CITIGROUP GLOBAL MARKETS INC.	CRD# 7059	NEW YORK, NY
IA	08/02/1994 - 06/11/2004	CITIGROUP GLOBAL MARKETS INC.	CRD# 7059	SUGARLAND, TX
B	05/19/1993 - 08/01/1994	PAINEWEBBER INCORPORATED	CRD# 8174	WEEHAWKEN, NJ
B	04/29/1993 - 07/29/1993	ARAGON FINANCIAL SERVICES, INC.	CRD# 16023	IRVINE, CA

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
04/2024 - Present	INTERNATIONAL ASSETS INVESTMENT MANAGEMENT, LLC	INVESTMENT ADVISOR	Y	The Woodlands, TX, United States
02/2023 - 04/2024	B. Riley Wealth Advisors	Independent Advisor	Y	The Woodlands, TX, United States
02/2023 - 04/2024	B. Riley Wealth Management	Registered Representative	Y	The Woodlands, TX, United States
08/2016 - 02/2023	Ameriprise Financial Services, Inc.	Registered Rep	Y	The Woodlands, TX, 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
Regulatory Event	1
Customer Dispute	2
Judgment/Lien	5

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:	FINRA
Sanction(s) Sought:	Suspension
Date Initiated:	02/19/2025
Docket/Case Number:	24-01964
Employing firm when activity occurred which led to the regulatory action:	N/A
Product Type:	No Product
Allegations:	Respondent Luft failed to comply with an arbitration award or settlement agreement or to satisfactorily respond to a FINRA request to provide information concerning the status of compliance.
Current Status:	Final
Resolution:	Letter
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:	02/19/2025

Sanctions Ordered:	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:	All capacities
Duration:	Indefinite
Start Date:	02/19/2025
End Date:	
Regulator Statement	Pursuant to Article VI, Section 3 of FINRA By-Laws, and FINRA Rule 9554, Respondent Luft is suspended on February 19, 2025 for failure to comply with an arbitration award or settlement agreement or to satisfactorily respond to a FINRA request to provide information concerning the status of compliance.

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:	SALOMON SMITH BARNEY
Allegations:	THE CLIENT ALLEGED MISREPRESENTATION WITH REGARD TO A CORPORATE BOND AND UNSUITABILITY. 2000 - 2001.
Product Type:	Debt - Corporate
Alleged Damages:	$23,500.00

Customer Complaint Information

Date Complaint Received:	07/29/2002
Complaint Pending?	No
Status:	Denied
Status Date:	09/13/2002
Settlement Amount:	
Individual Contribution Amount:	
Broker Statement	THE CLIENT'S COMPLAINT WAS DENIED.

Disclosure 2 of 2

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	SALOMON SMITH BARNEY
Allegations:	WITH REGARD TO THE PURCHASE OF AN EQUITY, THE CLIENT ALLEGED THAT HE WAS NOT INFORMED OF THE RISKS AND THAT THE PURCHASE WAS UNSUITABLE. OCTOBER 2001. ALLEGED DAMAGES UNSPECIFIED.
Product Type:	Equity Listed (Common & Preferred Stock)
Alleged Damages:	

Customer Complaint Information

Date Complaint Received:	03/04/2002
Complaint Pending?	No
Status:	Denied
Status Date:	04/08/2002
Settlement Amount:	

Individual Contribution Amount:	
Broker Statement	THE CLIENT'S CLAIM WAS DENIED.

Judgment/Lien

This disclosure event involves an unsatisfied and outstanding judgment or lien against the Investment Adviser Representative.

Disclosure 1 of 5

Reporting Source:	Individual
Judgment/Lien Holder:	Grey Fox Secured Funding LP
Judgment/Lien Amount:	$45,933.35
Judgment/Lien Type:	Civil
Date Filed with Court:	05/11/2023
Date Individual Learned:	01/12/2024
Type of Court:	State Court
Name of Court:	Harris County Civil Court
Location of Court:	Harris County, TX
Docket/Case #:	1197247
Judgment/Lien Outstanding?	Yes
Resolution:	Satisfied

Disclosure 2 of 5

Reporting Source:	Individual
Judgment/Lien Holder:	Jefferson Capital Systems LLC
Judgment/Lien Amount:	$9,352.87
Judgment/Lien Type:	Civil
Date Filed with Court:	05/31/2019
Date Individual Learned:	08/01/2023
Type of Court:	State Court
Name of Court:	Justice of the Peace Precinct 4, Place 2
Location of Court:	Humble, TX
Docket/Case #:	194200225678
Judgment/Lien Outstanding?	Yes

Disclosure 3 of 5

Reporting Source:	Individual
Judgment/Lien Holder:	Bank of America N A
Judgment/Lien Amount:	$15,055.00
Judgment/Lien Type:	Civil
Date Filed with Court:	02/13/2020
Date Individual Learned:	11/28/2022
Type of Court:	State Court

Name of Court:	Harris County Court
Location of Court:	Houston, TX
Docket/Case #:	1140380
Judgment/Lien Outstanding?	Yes

Disclosure 4 of 5

Reporting Source:	Individual
Judgment/Lien Holder:	Woodforest National Bank
Judgment/Lien Amount:	$16,930.35
Judgment/Lien Type:	Civil
Date Filed with Court:	04/09/2019
Date Individual Learned:	10/22/2019
Type of Court:	State Court
Name of Court:	Montgomery State Court
Location of Court:	Montgomery, TX
Docket/Case #:	18-12-16904
Judgment/Lien Outstanding?	Yes

Disclosure 5 of 5

Reporting Source:	Individual
Judgment/Lien Holder:	UBS Bank USA
Judgment/Lien Amount:	$22,706.68
Judgment/Lien Type:	Civil
Date Filed with Court:	11/26/2018
Date Individual Learned:	04/02/2019
Type of Court:	State Court
Name of Court:	Montgomery County Court
Location of Court:	Montgomery, TX
Docket/Case #:	18-08-10572
Judgment/Lien Outstanding?	Yes

End of Report

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