



IAPD Report

THOMAS JOSEPH BROUGH

CRD# 2403390

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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

THOMAS JOSEPH BROUGH (CRD# 2403390)

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 **02/03/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	CAPITAL TRUST WEALTH MANAGEMENT	CRD# 150860	09/18/2009

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	NEWPORT COAST SECURITIES, INC.	16944	NEW YORK, NY	06/15/2011 - 06/05/2012
B	WEDBUSH MORGAN SECURITIES INC.	877	CHICAGO, IL	06/27/2007 - 10/09/2009
IA	WEDBUSH MORGAN SECURITIES INC.	877	CHICAGO, IL	06/27/2007 - 10/09/2009

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	3
Termination	3



Qualifications

REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works. This individual is currently registered with **3** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **CAPITAL TRUST WEALTH MANAGEMENT**
Main Address: SCOTTSDALE, AZ
Firm ID#: 150860

Regulator	Registration	Status	Date
IA Arizona	Investment Adviser Representative	Approved	06/23/2017
IA Illinois	Investment Adviser Representative	Approved	04/29/2026
IA Indiana	Investment Adviser Representative	Approved	09/18/2009

Branch Office Locations

CAPITAL TRUST WEALTH MANAGEMENT
SCOTTSDALE, AZ




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



Principal/Supervisory Exams

	Exam	Category	Date
	General Securities Principal Examination (S24)	Series 24	06/02/1999

General Industry/Product Exams

	Exam	Category	Date
	General Securities Representative Examination (S7)	Series 7	10/02/1993

State Securities Law Exams

	Exam	Category	Date
	Uniform Investment Adviser Law Examination (S65)	Series 65	01/10/2001
	Uniform Securities Agent State Law Examination (S63)	Series 63	10/11/1993

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	06/15/2011 - 06/05/2012	NEWPORT COAST SECURITIES, INC.	CRD# 16944	NEW YORK, NY
B	06/27/2007 - 10/09/2009	WEDBUSH MORGAN SECURITIES INC.	CRD# 877	CHICAGO, IL
IA	06/27/2007 - 10/09/2009	WEDBUSH MORGAN SECURITIES INC.	CRD# 877	CHICAGO, IL
IA	05/09/2002 - 07/13/2007	BROOKSTREET CAPITAL MANAGEMENT	CRD# 14667	CHICAGO, IL
B	11/15/2001 - 07/13/2007	BROOKSTREET SECURITIES CORPORATION	CRD# 14667	CHICAGO, IL
B	10/26/2001 - 11/06/2001	COMMONWEALTH FINANCIAL NETWORK	CRD# 8032	WALTHAM, MA
B	11/18/1998 - 10/01/2001	EISNER SECURITIES, INC.	CRD# 40585	ST. LOUIS, MO
B	03/14/1997 - 10/14/1998	AMERICAN FRONTEER FINANCIAL CORPORATION	CRD# 1398	DENVER, CO
B	02/28/1996 - 02/06/1997	BARRON CHASE SECURITIES, INC.	CRD# 18969	BOCA RATON, FL
B	11/10/1995 - 12/12/1995	VTR CAPITAL, INC.	CRD# 21404	NEW YORK, NY
B	03/31/1995 - 11/01/1995	L.C. WEGARD & CO., INC.	CRD# 3722	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
09/2009 - Present	BROUGH INVESTMENT GROUP, LLC	INVESTMENT ADVISOR REPRESENTATIVE	Y	Scottsdale, AZ, United States



Registration & Employment History



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.

A) HEDGE ACCESS GROUP, LLC, TIN 45-5626680 INVESTMENT RELATED, 1927 North Oakley Avenue Chicago, Illinois 60647, RUN THREE (1) POOLED INVESTMENT LIMITED PARTNERSHIPS, MANAGING PARTNER, START DATE 09/01/2012, 10 HRS/MONTH, 150 HRS/MONTH, MANAGE THE BUSINESS.

1) LP HATGF TIN 90-1007963



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	3
Termination	3

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 3

Reporting Source: Regulator

Regulatory Action Initiated By: FINRA

Sanction(s) Sought: Other: N/A

Date Initiated: 05/28/2009

Docket/Case Number: 2007011348301

Employing firm when activity occurred which led to the regulatory action: BROOKSTREET SECURITIES CORPORATION

Product Type: Other: COLLATERALIZED MORTGAGE OBLIGATIONS

Allegations: SECTION 10(B) OF THE SECURITIES EXCHANGE ACT OF 1934 AND RULE 10B-5, NASD RULES 2110, 2120, 2310(A) AND 2510(B): RESPONDENT THOMAS J. BROUGH FRAUDULENTLY INDUCED RETAIL CUSTOMERS TO INVEST IN COMPLEX, ILLIQUID AND RISKY COLLATERALIZED MORTGAGE OBLIGATIONS (CMOS). THROUGH FRAUDULENT OR NEGLIGENT MISREPRESENTATIONS AND OMISSIONS, BROUGH LED CUSTOMERS TO BELIEVE THAT THROUGH CMO INVESTMENTS THEY COULD SAFELY ACHIEVE CONSISTENTLY HIGH ANNUAL RETURNS, IN SOME CASES UP TO 15% YEAR AFTER YEAR, REGARDLESS OF MARKET CONDITIONS, WITH THE GOVERNMENT BACKING THE INVESTMENTS. HOWEVER, THE CMOS BROUGH BOUGHT FOR CUSTOMERS WERE GENERALLY NOT GOVERNMENT GUARANTEED, AND WERE SUBJECT TO PRICE VOLATILITY AND UNCERTAIN CASH FLOWS AND MATURITIES, BASED ON CHANGES IN INTEREST RATES. BROUGH FAILED TO DISCLOSE MATERIAL CHARACTERISTICS OF, AND RISKS ASSOCIATED WITH, DIFFERENT CMOS WITH SUBSTANTIALLY DIFFERENT PAYMENT STRUCTURES AND INTEREST



RATE SENSITIVITY, AND FAILED TO ENSURE THAT HIS CUSTOMERS UNDERSTOOD THE CHARACTERISTICS AND RISKS OF CMOS. BROUGH FAILED TO INVESTIGATE ADEQUATELY AND UNDERSTAND THE CMO PRODUCTS, AND DID NOT HAVE REASONABLE GROUNDS TO BELIEVE THAT THE INDIVIDUAL CMO PURCHASES WERE SUITABLE FOR EACH CUSTOMER. THE CMOS WERE NOT SUITABLE INVESTMENTS FOR THESE CUSTOMERS BASED UPON THEIR DISCLOSED INVESTMENT EXPERIENCE, INVESTMENT OBJECTIVES, FINANCIAL SITUATION AND NEEDS. THE CUSTOMERS WERE EXPOSED TO SIGNIFICANT RISKS, WHICH THEY DID NOT UNDERSTAND, AND WHICH BROUGH DID NOT TAKE THE TIME TO UNDERSTAND OR IGNORED. MANY CUSTOMERS SUFFERED CONSIDERABLE LOSSES TO THEIR RETIREMENT SAVINGS. BROUGH ALSO IMPROPERLY EXERCISED DISCRETIONARY AUTHORITY TO BUY AND SELL THE SECURITIES WITHOUT WRITTEN AUTHORIZATION FROM HIS FIRM AND THE CUSTOMERS.

Current Status: Final

Resolution: Decision & Order of Offer of Settlement

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: 09/03/2010

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:	EIGHT MONTHS
Start Date:	09/20/2010
End Date:	05/19/2011

Regulator Statement

OFFER OF SETTLEMENT DATED SEPTEMBER 3, 2010: THE ALLEGATIONS THAT RESPONDENT VIOLATED SECTION 10(B) OF THE SECURITIES EXCHANGE ACT OF 1934 AND SEC RULE 10B-5 AND NASD RULES 2120 WERE DISMISSED.

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, BROUGH CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE HE IS SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY FOR EIGHT MONTHS. BROUGH AGREES AND UNDERTAKES TO FULLY AND PROMPTLY COOPERATE WITH FINRA IN ANY AND ALL INVESTIGATIONS AND/OR DISCIPLINARY PROCEEDINGS, OF ANY PERSON OR ENTITY, CONCERNING CONDUCT AT AND/OR RELATING TO HIS FIRM DURING THE TIME PERIOD HE WAS ASSOCIATED WITH THE FIRM. BROUGH AGREES THAT HE SHALL PRODUCE PROMPTLY INFORMATION AND DOCUMENTS AS REQUESTED BY FINRA AND APPEAR



AND TESTIFY, COMPLETELY AND TRUTHFULLY AT ANY INTERVIEW AND/OR DISCIPLINARY HEARING AS REQUESTED BY FINRA. THE SUSPENSION IS IN EFFECT FROM SEPTEMBER 20, 2010, THROUGH MAY 19, 2011.

Reporting Source: Individual

Regulatory Action Initiated By: FINRA

Sanction(s) Sought: Suspension

Date Initiated: 05/28/2009

Docket/Case Number: 2007011348301

Employing firm when activity occurred which led to the regulatory action: BROOKSTREET SECURITIES CORPORATION

Product Type: Other: COLLATERALIZED MORTGAGE OBLIGATIONS

Allegations: SECTION 10(B) OF THE SECURITIES EXCHANGE ACT OF 1934 AND RULE 10B-5, NASD RULES 2110, 2120, 2310(A) AND 2510(B): RESPONDENT THOMAS J. BROUGH FAILED TO DISCLOSE MATERIAL FACTS REGARDING RECOMMENDATIONS TO CUSTOMERS TO INVEST IN COMPLEX, ILLIQUID AND RISKY COLLATERALIZED MORTGAGE OBLIGATIONS (CMOS). THROUGH MISREPRESENTATIONS AND OMISSIONS, BROUGH ADVISED CLIENTS THAT THROUGH CMO INVESTMENTS THEY COULD SAFELY ACHIEVE CONSISTENTLY HIGH ANNUAL RETURNS, REGARDLESS OF MARKET CONDITIONS, WITH THE GOVERNMENT BACKING THE INVESTMENTS. HOWEVER, THE CMOS BROUGH BOUGHT FOR CUSTOMERS WERE GENERALLY NOT GOVERNMENT GUARANTEED, AND WERE SUBJECT TO PRICE VOLATILITY AND UNCERTAIN CASH FLOWS AND MATURITIES, BASED ON CHANGES IN INTEREST RATES.

BROUGH FAILED TO DISCLOSE MATERIAL CHARACTERISTICS OF, AND RISKS ASSOCIATED WITH, DIFFERENT CMOS WITH SUBSTANTIALLY DIFFERENT PAYMENT STRUCTURES AND INTEREST RATE SENSITIVITY, AND FAILED TO ENSURE THAT HIS CUSTOMERS UNDERSTOOD THE CHARACTERISTICS AND RISKS OF CMOS. BROUGH FAILED TO INVESTIGATE ADEQUATELY AND UNDERSTAND THE CMO PRODUCTS, AND DID NOT HAVE REASONABLE GROUNDS TO BELIEVE THAT THE INDIVIDUAL CMO PURCHASES WERE SUITABLE FOR EACH CUSTOMER. BROUGH ALSO IMPROPERLY EXERCISED DISCRETIONARY AUTHORITY TO BUY AND SELL THE SECURITIES WITHOUT WRITTEN AUTHORIZATION FROM HIS FIRM AND THE CUSTOMERS.

Current Status: Final

Resolution: Decision & Order of Offer of Settlement

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: 09/20/2010

Sanctions Ordered: Suspension
Other: NONE

**Sanction 1 of 1**

Sanction Type: Suspension
Capacities Affected: ALL CAPACITIES LIMITED TO FINRA-REGISTERED FIRM
Duration: EIGHT MONTHS
Start Date: 09/20/2010
End Date: 05/19/2011

Broker Statement

OFFER OF SETTLEMENT EFFECTIVE 9/20/2010: THE ALLEGATIONS THAT MR. BROUGH VIOLATED SECTION 10(B) OF THE SECURITIES EXCHANGE ACT OF 1934 AND NASD RULE 2120 WERE DISMISSED. PURSUANT TO FINRA RULE 9270(E), FINRA'S DEPARTMENT OF ENFORCEMENT AND THE NATIONAL ADJUDICATORY COUNCIL ISSUED AN ORDER ACCEPTING AN OFFER OF SETTLEMENT OF THOMAS J. BROUGH FOR WHICH MR. BROUGH HAS CONSENTED, WITHOUT ADMITTING OR DENYING THE ALLEGATIONS OF FINRA. NO MONETARY FINES OR OTHER SANCTIONS WERE ISSUED OR ORDERED. MR. BROUGH HAS BEEN SUSPENDED FROM AFFILIATING WITH A FINRA MEMBER FIRM UNTIL MAY 19, 2011. THERE IS NO SUSPENSION OR ACTION RELATING TO MR. BROUGH'S ROLE AS AN ADVISORY REPRESENTATIVE WITH BROUGH INVESTMENT ADVISORS.

Disclosure 2 of 3

Reporting Source: Regulator
Regulatory Action Initiated By: IN
Sanction(s) Sought:
Other Sanction(s) Sought:
Date Initiated: 12/07/1998
Docket/Case Number: 98-0361RA

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

Product Type:

Other Product Type(s):

Allegations: Not Provided
Current Status: Final
Resolution: Stipulation and Consent
Resolution Date: 12/21/1998

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: FILED ORDER OF RESTRICTIVE AGREEMENT 12/21/1998

Regulator Statement

ON OR ABOUT DECEMBER 3, 1998, THE AGENT APPLIED FOR REGISTRATION IN INDIANA. AFTER REVIEW OF HIS DESCIPINARY HISTORY, THE REGISTRATION WAS APPROVED WITH RESTRICTIONS THAT INCLUDES STRICT SUPERVISION, NO DISCRETIONARY AUTHORITY OVER



INDIANA ACCOUNTS, APPROVAL BT THE BRANCH MANAGER OF NEW ACCOUNTS, NOTIFICATION TO THE DIVISION OF ANY COMPLAINTS, AND COMPLIANCE WITH ALL STATE/FEDERAL SECURITIES LAWS. CONTACT: JEFFREY M. GERSHON (317) 232-6681

Reporting Source: Individual

Regulatory Action Initiated By: STATE OF INDIANA

Sanction(s) Sought: Other

Other Sanction(s) Sought: SUPERVISION

Date Initiated: 12/07/1998

Docket/Case Number: 98-0361RA

Employing firm when activity occurred which led to the regulatory action: EISNER SECURITIES

Product Type: No Product

Other Product Type(s):

Allegations: THE NASD SUSPENDED MY LICENSE FOR FAILURE TO DISCLOSE STATE ALLEGED FAILURE TO DISCLOSE THE FIRM ALLEGED I SIGNED A CLIENTS U-9 FORM WITHOUT PROPER AUTHORIZATION.

Current Status: Final

Resolution: Stipulation and Consent

Resolution Date: 12/21/1998

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: ORDER OF REGISTRATION AGREEMENT ISSUDE WHICH PLACED MYSELF UNDER SUPERVISION UNTIL SUCH TIME AS I PASS MY SERIES 24

Broker Statement ORDER OF REGISTRATION AGREEMENT ISSUDE WHICH PLACED MYSELF UNDER SUPERVISION UNTIL SUCH TIME AS I PASSED MY SERIES 24. EXAM WAS PASSED ON 06/02/1999.

Disclosure 3 of 3

Reporting Source: Regulator

Regulatory Action Initiated By: ILLINOIS SECURITIES DEPARTMENT

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 03/29/1995

Docket/Case Number: 9400705



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

Product Type:

Other Product Type(s):

Allegations: THE RESPONDENT FILED A FALSE REPORT TO THE SECRETARY OF STATE, SECURITIES DEPARTMENT IN THAT HE FAILED TO DISCLOSE ON HIS FORM U-4 APPLICATION.

Current Status: Final

Resolution: Consent

Resolution Date: 03/29/1995

Sanctions Ordered: Censure
Monetary/Fine \$2,000.00
Suspension

Other Sanctions Ordered:

Sanction Details: CONSENT ORDER OF SUSPENSION, CENSURE AND FINE ISSUED MARCH 29, 1995. RESPONDENT IS CENSURED, FINED \$2,000.00 AND IS SUSPENDED FOR NINETY DAYS.

Regulator Statement CONTACT: 217-785-4940

Reporting Source: Individual

Regulatory Action Initiated By: ILLINOIS SECURITIES DEPARTMENT

Sanction(s) Sought: Suspension

Other Sanction(s) Sought:

Date Initiated: 12/16/1994

Docket/Case Number: 9400705

Employing firm when activity occurred which led to the regulatory action: L.C. WEGARD

Product Type: No Product

Other Product Type(s):

Allegations: STATE ALLEGES FAILURE TO DISCLOSE ON ORIGINAL U-4.

Current Status: Final

Resolution: Consent

Resolution Date: 03/19/1995

Sanctions Ordered: Censure
Monetary/Fine \$2,000.00
Suspension

Other Sanctions Ordered:

Sanction Details: APPLICANT WAS CENSURED, FINED \$2,000.00 AND HAD



HIS REGISTRATION IN THE STATE OF ILLINOIS SUSPENDED FOR NINETY DAYS.



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 3

Reporting Source: Firm
Firm Name: WEDBUSH MORGAN SECURITIES
Termination Type: Voluntary Resignation
Termination Date: 09/15/2009
Allegations: COMPLAINT ALLEGATIONS OF UNSUITABLE STRATEGY AND FAILURE TO DISCLOSE INVESTMENT RISKS.
Product Type: Equity Listed (Common & Preferred Stock)
Other: ETF'S

Reporting Source: Individual
Firm Name: WEDBUSH MORGAN SECURITIES
Termination Type: Voluntary Resignation
Termination Date: 09/15/2009
Allegations: COMPLAINT ALLEGATIONS OF UNSUITABLE STRATEGY AND FAILURE TO DISCLOSE INVESTMENT RISKS.
Product Type: Equity Listed (Common & Preferred Stock)
Other: ETF'S

Disclosure 2 of 3

Reporting Source: Individual
Firm Name: AMERICAN FRONTIER FINANCIAL
Termination Type: Permitted to Resign
Termination Date: 10/13/1998
Allegations: THE FIRM ALLEGES I SIGNED A CLIENTS W-9 FORM WITHOUT PROPER AUTHORIZATION.
Product Type: No Product

Other Product Types:

Broker Statement MY CLIENT, WHO WOULD BE MORE THAN HAPPY TO SPEAK WITH YOU, GAVE ME WRITTEN AUTHORIZATION TO SIGN HIS W-9 FORM IN ORDER TO PREVENT A SELLUT IN HIS ACCOUNT. AMERICAN FRONTIER LOST THE CLIENTS PREVIOUS W-9 WHEN IT HAD CHANGED CLEARING FIRMS. I DO NOT BELIEVE I WOULD HAVE BEEN FIRED EXCEPT FOR THE FACT THAT THEY KENW I WAS INTERESTED IN QUITTING THEIR FIRM.

Disclosure 3 of 3

Reporting Source: Individual



Firm Name: BARRON CHASE SECURITIES, INC.

Termination Type: Discharged

Termination Date: 01/31/1997

Allegations: FIRM ALLEGES I HAD ENGAGED IN CONDUCT INCONSISTANTWITH JUSTAND EQUITABLE PRINCIPLES OF TRADE

Product Type: No Product

Other Product Types:

Broker Statement I COMPLETELY DENY ANDY ALLEGATIONS MADE AGAINST ME. I FEEL THE REAL REASON I WAS FIRED WAS BECAUSE I WAS INTERVIEWING WITH OTHER FIRMS. I WAS NEVER WARNED THAT I COULD BE FIRED FOR ANY OF THE REASONS BARRON CHASE MAY HAVE GIVEN. I TAKE PRIDE IN THE MANNER IN WHICH I CONDUCT MY BUSINESS AND HAVE NEVER HAD A CUSTOMER COMPLAINT OR ARBITRATION. I HOPE MY DISMISSAL FROM BARRON CHASE WILL NOT HAVE A NEGATIVE IMPACT ON MY CAREER.



End of Report

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