



IAPD Report

David Keith Hays

CRD# 2434893

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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

David Keith Hays (CRD# 2434893)

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 **04/13/2026**.

CURRENT EMPLOYERS

| | Firm | CRD# | Registered Since |
|-----------|---------------------------|-------------|------------------|
| IA | CFCI | CRD# 128257 | 10/22/2003 |
| B | J.W. COLE FINANCIAL, INC. | CRD# 124583 | 05/22/2013 |
| IA | J. W. COLE ADVISORS, INC. | CRD# 112294 | 05/30/2013 |

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **10** 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 | SPC | 110692 | BLOOMINGTON, IN | 11/14/2002 - 04/09/2013 |
| B | SAMMONS SECURITIES COMPANY, LLC | 115368 | BLOOMINGTON, IN | 11/06/2002 - 04/09/2013 |
| IA | FSC SECURITIES CORPORATION | 7461 | BLOOMINGTON, IN | 05/17/1999 - 11/06/2002 |

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 |
|------------------|-------|
| Customer Dispute | 5 |
| Termination | 1 |



Report Summary



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 **10** jurisdiction(s) and 1 SRO(s) through his or her employer(s).

Employment 1 of 3

Firm Name: **J.W. COLE FINANCIAL, INC.**
Main Address: 4301 ANCHOR PLAZA PARKWAY
SUITE 450
TAMPA, FL 33634
Firm ID#: 124583

| | Regulator | Registration | Status | Date |
|----------|----------------|-----------------------------------|----------|------------|
| B | FINRA | Corporate Securities Represent | Approved | 05/22/2013 |
| B | FINRA | General Securities Principal | Approved | 05/22/2013 |
| B | FINRA | General Securities Representative | Approved | 05/22/2013 |
| B | FINRA | Invest. Co and Variable Contracts | Approved | 05/22/2013 |
| B | Alabama | Agent | Approved | 07/28/2022 |
| B | California | Agent | Approved | 05/22/2013 |
| B | Florida | Agent | Approved | 07/18/2016 |
| B | Georgia | Agent | Approved | 06/04/2021 |
| B | Indiana | Agent | Approved | 05/31/2013 |
| B | Kentucky | Agent | Approved | 10/10/2023 |
| B | New York | Agent | Approved | 07/08/2013 |
| B | North Carolina | Agent | Approved | 05/15/2019 |
| B | South Carolina | Agent | Approved | 10/10/2019 |



Qualifications

| Regulator | Registration | Status | Date |
|-----------|--------------|--------|------|
|-----------|--------------|--------|------|

| | | | |
|----------------|-------|----------|------------|
| B Texas | Agent | Approved | 01/08/2019 |
|----------------|-------|----------|------------|

Branch Office Locations

674 S. COLLEGE AVE.
BLOOMINGTON, IN 47403

Employment 2 of 3

Firm Name: **J. W. COLE ADVISORS, INC.**
 Main Address: 4301 ANCHOR PLAZA PARKWAY
 SUITE 450
 TAMPA, FL 33634
 Firm ID#: 112294

| Regulator | Registration | Status | Date |
|-----------|--------------|--------|------|
|-----------|--------------|--------|------|

| | | | |
|-------------------|-----------------------------------|----------|------------|
| IA Indiana | Investment Adviser Representative | Approved | 05/30/2013 |
|-------------------|-----------------------------------|----------|------------|

Branch Office Locations

J. W. COLE ADVISORS, INC.
674 S. College Avenue
Bloomington, IN 47403

Employment 3 of 3

Firm Name: **CFCI**
 Main Address: 674 S. COLLEGE AVENUE
 BLOOMINGTON, IN 47403
 Firm ID#: 128257

| Regulator | Registration | Status | Date |
|-----------|--------------|--------|------|
|-----------|--------------|--------|------|

| | | | |
|-------------------|-----------------------------------|----------|------------|
| IA Indiana | Investment Adviser Representative | Approved | 10/22/2003 |
|-------------------|-----------------------------------|----------|------------|

| | | | |
|-----------------|-----------------------------------|---------------------|------------|
| IA Texas | Investment Adviser Representative | Restricted Approval | 03/24/2005 |
|-----------------|-----------------------------------|---------------------|------------|

Branch Office Locations

CFCI
674 S. COLLEGE AVE
BLOOMINGTON, IN 47403




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



Principal/Supervisory Exams

| | Exam | Category | Date |
|---|--|-----------|------------|
|  | General Securities Principal Examination (S24) | Series 24 | 01/12/1999 |

General Industry/Product Exams

| | Exam | Category | Date |
|---|--|-----------|------------|
|  | Securities Industry Essentials Examination (SIE) | SIE | 10/01/2018 |
|  | General Securities Representative Examination (S7) | Series 7 | 03/24/1999 |
|  | Corporate Securities Limited Representative Examination (S62) | Series 62 | 06/06/1997 |
|  | Investment Company Products/Variable Contracts Representative Examination (S6) | Series 6 | 12/28/1993 |

State Securities Law Exams

| | Exam | Category | Date |
|---|--|-----------|------------|
|  | Uniform Investment Adviser Law Examination (S65) | Series 65 | 10/15/2009 |
|  | Uniform Securities Agent State Law Examination (S63) | Series 63 | 12/29/1993 |

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 |
|----|-------------------------|---------------------------------|----------------|-----------------|
| IA | 11/14/2002 - 04/09/2013 | SPC | CRD# 110692 | BLOOMINGTON, IN |
| B | 11/06/2002 - 04/09/2013 | SAMMONS SECURITIES COMPANY, LLC | CRD# 115368 | BLOOMINGTON, IN |
| IA | 05/17/1999 - 11/06/2002 | FSC SECURITIES CORPORATION | CRD# 7461 | BLOOMINGTON, IN |
| B | 10/09/1998 - 11/06/2002 | FSC SECURITIES CORPORATION | CRD# 7461 | ATLANTA, GA |
| B | 11/01/1995 - 10/13/1998 | ASCEND FINANCIAL SERVICES, INC. | CRD# 15296 | ST. PAUL, MN |
| B | 01/14/1994 - 11/07/1995 | NEW ENGLAND SECURITIES | CRD# 615 | 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 |
|-------------------|---|---|--------------------|-----------------------------------|
| 05/2013 - Present | J.W. COLE ADVISORS, INC. | INVESTMENT ADVISOR REPRESENTATIVE | Y | TAMPA, FL, United States |
| 05/2013 - Present | J.W. COLE FINANCIAL, INC. | REGISTERED REPRESENTATIVE | Y | TAMPA, FL, United States |
| 08/2003 - Present | COMPREHENSIVE FINANCIAL CONSULTANTS INSTITUTIONAL, INC. | PRESIDENT, INVESTMENT ADVISER REPRESENTATIVE | Y | BLOOMINGTON, IN, United States |
| 02/1994 - Present | COMPREHENSIVE FINANCIAL CONSULTANTS, INC | OTHER - FINANCIAL ADVISOR | N | BLOOMINGTON, IN, United States |

OTHER BUSINESS ACTIVITIES

This section includes information, if any, as provided by the representative regarding other business activities the representative is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent, or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious, or fraternal and is recognized as tax exempt.

- (1) Sells Various lines of insurance through various insurance companies
- (2) Comprehensive Financial Consultants Institutional INC (CFCI): President; Prepare Taxes; RIA.
- (3) David Hays; Author; Promote Book, Speaking Engagements; 4 HRS/MO; \$500/YR.
- (4) Monroe Hospital; Board Member; 4011 S Monroe Medical Park BLVD, Bloomington, IN 47403; Healthcare; 12/2005; 1



Registration & Employment History



OTHER BUSINESS ACTIVITIES

HR/MO; 0 during trading hours; Quarterly Meetings / Special Meetings.

(5) Comprehensive Financial Consultants of Indiana, INC. (CFC); President; 674 S. College AVE Bloomington IN 47403; Operating company for financial planning, Insurance sales, Investments and Tax Prep; Owner; 10/1994; 165 HRS/MO during trading hours; Officer/Director.

(6) Hoosier Choice Properties LLC; Real estate property mgmt company; LLC; Non-Investment Related; 4HRS/MO, 4 During trading.

(7) Lake Lemon Porthole LLC; 8301 South Anne Avenue; Not investment related; Rental Real Estate and Restaurant; Member; Entity set up, quarterly partner meeting; Start 1/1/2023; 0 hours during trading.

(8) Speedway Partners LLC; 672 S College Ave Bloomington, IN; Non-Investment Related; Managing Member; Historic racetrack that will be rented out for events and community usage; Start 11/2024; 0 hours during trading.

(9) Beck Financial Strategies; DBA; Investment Advisory Firm; Partner/Owner; 5825 N Post Road, Indianapolis, IN 46216; Investment related; Start Date: 7/18/1995; 10 hours/month during trading

(10) Indiana Security LLC; Event and business security; Partner/Owner; 672 S. College Avenue, Bloomington, IN 47403; Not Investment Related; ?Start Date 10/14/25; 2 Hours/mo during trading.

Real Estate Investments, Non-Investment Related:

(11) South College Investments, LLC; 660 S College Ave; Commercial property; Member; 10/2002; 1 HR/MO, 1 during trading hours; Owner.

(12) Rockport Investment Group LLC; 5110 S Commercial St Bloomington, IN; Commercial and Residential Real Estate; Member; 5/1997; 1 HR/ MO / 1 during trading hours; Annual Meetings.

(13) WWHB LLC; 8301 Anne Ave, Bloomington IN 47401; Rental Real Estate; 1/2002; 1 HR/MO; 1 during trading hours; Owner.

(14) Smith & Hays Properties LLC; 1575 Linda Ln, Bloomington IN 47401; Commercial Rental Real Estate; Owner; 4/2004; 1 HR/MO; 1 during trading hours.

(15) DBH Development LLC; 8301 Anne Ave, Bloomington IN 47401; Land for future investment; Member; 4/2007.

(16) Generational Properties, LLC.; 674 S College Ave., Bloomington, IN 47403; Apt Complex; Member; Start date: 6/9/2020; 8 hours per month, 4 during trading hours; .

(17) Rugar Hays; 50% Owner - start 1/1/2021; 8301 S Anne Ave Bloomington, IN 47401; Owner of Membership interest in Generational Properties LLC, a Real Estate Holding Company; 4 hours/mo, 0 during trading.

(18) WDBH LLC; Managing Member; 8301 S. Anne Avenue Bloomington, IN 47401; 0 hours per month during trading.

(19) Hays Warehouse LLC; 672 S. College Ave., Bloomington, IN 47403; Start date: 6/30/2021; Member; Monthly update meetings; 2 hours per month, 0 during trading.

(20) Robert Stillions Legacy LLC; 674 S College Ave Bloomington IN 47403; start date: 12/14/2021; owner of a vacant lot; 0 hours per month during trading.

(21) BuyBackTheBlock LLC; 3943 Bennett Drive, Indianapolis, IN 46254; Start 7/26/2021; Member; 0 hours.

(22) 4MNE LLC; 3746 E Commodore, Bloomington, IN, 47401; Member; 7/1/2024; 0 hours spent



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 |
|------------------|-------|
| Customer Dispute | 5 |
| Termination | 1 |

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 5

| | |
|--|--|
| Reporting Source: | Firm |
| Employing firm when activities occurred which led to the complaint: | SAMMONS SECURITIES COMPANY |
| Allegations: | STATEMENT OF CLAIM ALLEGED MISREPRESENTATION; BREACH OF FIDUCIARY DUTY; AND NEGLIGENCE IN CONNECTION WITH THE INVESTMENTS PURCHASED IN 2009. CLAIM FURTHER ALLEGED FAILURE TO SUPERVISE (NEGLIGENT SUPERVISION). |
| Product Type: | Real Estate Security |
| Alleged Damages: | \$330,000.00 |
| 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 NORTHEAST REGIONAL OFFICE |
| Docket/Case #: | 14-00783 |
| Filing date of arbitration/CFTC reparation or civil litigation: | 03/07/2014 |

Customer Complaint Information



Date Complaint Received: 04/08/2014

Complaint Pending? No

Status: Settled

Status Date: 07/24/2014

Settlement Amount: \$17,500.00

Individual Contribution Amount: \$0.00

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: SAMMONS SECURITIES COMPANY

Allegations: STATEMENT OF CLAIM ALLEGED MISREPRESENTATION; BREACH OF FIDUCIARY DUTY; AND NEGLIGENCE IN CONNECTION WITH THE INVESTMENTS PURCHASED IN 2009. CLAIM FURTHER ALLEGED FAILURE TO SUPERVISE (NEGLIGENT SUPERVISION).

Product Type: Real Estate Security

Alleged Damages: \$330,000.00

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 NORTHEAST REGIONAL OFFICE

Docket/Case #: 14-00783

Filing date of arbitration/CFTC reparation or civil litigation: 03/07/2014

Customer Complaint Information

Date Complaint Received: 04/08/2014

Complaint Pending? No

Status: Settled

Status Date: 07/24/2014

Settlement Amount: \$17,500.00

Individual Contribution Amount: \$0.00

Disclosure 2 of 5

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: SAMMONS SECURITIES COMPANY



Allegations: CLIENT ALLEGES THAT IN 2005 RR PLACED THE MAJORITY OF HIS HOLDING INTO AN ILLIQUID REIT THAT WAS MISREPRESENTED AND UNSUITABLE AT THE TIME OF SALE.

Product Type: Real Estate Security

Alleged Damages: \$249,193.16

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: 11/21/2013

Complaint Pending? No

Status: Denied

Status Date: 01/14/2014

Settlement Amount:

Individual Contribution Amount:

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: SAMMONS SECURITY COMPANY

Allegations: CLIENT ALLEGES THAN IN 2005 RR PLACED THE MAJORITY OF HIS HOLDING INTO AN ILLIQUID REIT THAT WAS MISREPRESENTED AND UNSUITABLE AT THE TIME OF SALE.

Product Type: Real Estate Security

Alleged Damages: \$249,193.16

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation? No

Arbitration/Reparation forum or court name and location:

Docket/Case #:

Filing date of arbitration/CFTC reparation or civil litigation: 11/21/2013

Customer Complaint Information

Date Complaint Received: 12/06/2013

Complaint Pending? No

Status: Denied



Status Date: 01/14/2014

Settlement Amount:

Individual Contribution Amount:

Broker Statement CLIENT'S OCCUPATION WAS IN REAL ESTATE AND BASED ON CLIENT'S 20 YEAR INVESTMENT EXPERIENCE, REP HAD REASONABLE BASIS TO BELIEVE THAT THE CLIENT WAS ABLE TO UNDERSTAND THE RISKS OF A REAL ESTATE PRODUCT. LESS THAN 25% OF CLIENT'S INVESTMENT ASSETS WERE COMPRISED OF THE REIT AND THE CLIENT'S ANNUAL INCOME AND NET WORTH MET THE SUITABILITY REQUIREMENTS OF THE REIT PRODUCT. THERE WAS NO FEE CHARGED ON THE REIT.

Disclosure 3 of 5

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: SAMMONS SECURITIES COMPANY,

Allegations: JULY 26, 2012 CO-TRUSTEE ALLEGES THAT RR SOLD INAPPROPRIATE ILLIQUID INVESTMENTS GIVEN THE AGE OF THE GRANTOR.

Product Type: Annuity-Variable
Real Estate Security

Alleged Damages: \$92,000.00

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: 10/08/2013

Complaint Pending? No

Status: Denied

Status Date: 12/05/2013

Settlement Amount:

Individual Contribution Amount:

.....

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: SAMMONS SECURITIES COMPANY

Allegations: JULY 26, 2013 CO-TRUSTEE ALLEGES THAT RR SOLD INAPPROPRIATE ILLIQUID INVESTMENTS GIVEN THE AGE OF THE GRANTOR.

Product Type: Annuity-Variable
Real Estate Security

Alleged Damages: \$92,000.00



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: 10/08/2013

Complaint Pending? No

Status: Denied

Status Date: 12/05/2013

Settlement Amount:

Individual Contribution
Amount:

Broker Statement

THE ANNUITY WAS STRUCTURED TO PROVIDE GUARANTEED INCOME, IF NEEDED FOR AGING GRANTOR - [CUSTOMER]. THE ANNUITANT WAS THE TRUSTEE, [TRUSTEE], FOR WHICH THE INCOME PAYMENTS WOULD BE BASED. IF THE GRANTOR OF THE TRUST PASSED AWAY, THE BENEFICIARIES OF THE TRUST COULD SPLIT THE ANNUITY AND EITHER SURRENDER THE CONTRACT OR MAINTAIN GUARANTEED INCOME PAYMENTS FOR THE ANNUITANT'S LIFE-TIME. THIS WAS TO CREATE A POSSIBLE "INCOME INHERITANCE". HOWEVER SHORTLY AFTER THE CONTRACT WAS ISSUED THE TRUSTEE INFORMED ME THAT HER SISTER (WHO FILED THE COMPLAINT AND WHOM I'VE NEVER MET OR SPOKE TO), INSISTED WE CANCEL THE CONTRACT, SO WE DID. THIS CANCELANION DID RESULT IN A NET INVESTMENT LOSS, DUE TO THE UNDERLYING PERFORMANCE OF THE SUBACCOUNTS DURING THIS SHORT PERIOD OF TIME, BUT NO SURRENDER CHARGES WERE ASSESSED. THE NON-TRADED REIT REPRESENTED APPROXIMATE 3% OF THE GRANTOR'S ENTIRE NET WORTH - AS STATED BY THE TRUSTEE [TRUSTEE] AT THE TIME. ALL PROPER DISCLOSURES WERE GIVEN ALONG WITH A PROSPECTUS. THE TRUSTEE SIGNED ALL THE DOCUMENTS THAT DESCRIBED THE ILLIQUID NATURE AND RISK OF THE INVESTMENT.

Disclosure 4 of 5

Reporting Source: Firm

Employing firm when
activities occurred which led
to the complaint: PARKLAND SECURITIES, LLC FKA SAMMONS SECURITIES COMPANY

Allegations: STATEMENT OF CLAIM ALLEGED MISREPRESENTATION; BREACH OF FIDUCIARY DUTY; AND NEGLIGENCE IN CONNECTION WITH THE INVESTMENTS PURCHASED IN 2007. CLAIM FURTHER ALLEGED FAILURE TO SUPERVISE (NEGLIGENT SUPERVISION).

Product Type: Equipment Leasing

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 MIDWEST REGIONAL OFFICE

Docket/Case #: 13-00094

Filing date of arbitration/CFTC reparation or civil litigation: 01/08/2013

Customer Complaint Information

Date Complaint Received: 01/22/2013

Complaint Pending? No

Status: Settled

Status Date: 11/10/2016

Settlement Amount: \$35,000.00

Individual Contribution Amount: \$0.00

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: SAMMONS SECURITIES COMPANY

Allegations: STATEMENT OF CLAIM ALLEGED MISREPRESENTATION; BREACH OF FIDUCIARY DUTY; AND NEGLIGENCE IN CONNECTION WITH THE INVESTMENTS PURCHASED IN 2007. CLAIM FURTHER ALLEGED FAILURE TO SUPERVISE (NEGLIGENT SUPERVISION).

Product Type: Equipment Leasing
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 MIDWEST REGIONAL OFFICE

Docket/Case #: 13-00094

Filing date of arbitration/CFTC reparation or civil litigation: 01/08/2013

Customer Complaint Information

Date Complaint Received: 01/22/2013

Complaint Pending? No

Status: Settled

Status Date: 11/10/2016

Settlement Amount: \$35,000.00



Individual Contribution Amount: \$0.00

Disclosure 5 of 5

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: FSC SECURITIES CORPORATION

Allegations: CLIENT ALLEGES REPRESENTATIVE MISREPRESENTED THE BENEFITS OF THE POLICY

Product Type: Annuity(ies) - Variable

Other Product Type(s): REIT

Alleged Damages: \$5,000.00

Customer Complaint Information

Date Complaint Received: 07/25/2002

Complaint Pending? No

Status: Withdrawn

Status Date: 01/29/2003

Settlement Amount:

Individual Contribution Amount:
.....

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: FSC SECURITIES CORPORATION

Allegations: CLIENT ALLEGES REPRESENTATIVE MISREPRESENTED THE BENEFITS OF THE POLICY.

Product Type: Annuity(ies) - Variable

Other Product Type(s): REIT

Alleged Damages: \$5,000.00

Customer Complaint Information

Date Complaint Received: 07/25/2002

Complaint Pending? No

Status: Withdrawn

Status Date: 01/29/2003

Settlement Amount:

Individual Contribution Amount:



Termination

This disclosure event involves a situation where the Investment Adviser Representative voluntarily resigned, was discharged or was permitted to resign after allegations were made that accused the Investment Adviser Representative of violating investment-related statutes, regulations, rules or industry standards of conduct; fraud or the wrongful taking of property; or failure to supervise in connection with investment-related statutes, regulations, rules or industry standards of conduct.

Disclosure 1 of 1

Reporting Source: Firm
Firm Name: SAMMONS SECURITIES
Termination Type: Discharged
Termination Date: 04/09/2013
Allegations: FAILURE TO FOLLOW FIRM PROCEDURES PERTAINING TO THE RECEIPT AND TRANSMISSION OF CUSTOMER FUNDS AND CUSTOMER LENDING.
Product Type: Real Estate Security

Reporting Source: Individual
Firm Name: SAMMONS SECURITIES COMPANY
Termination Type: Discharged
Termination Date: 04/09/2013
Allegations: FAILURE TO FOLLOW FIRM PROCEDURES PERTAINING TO THE RECEIPT AND TRANSMISSION OF CUSTOMER FUNDS AND CUSTOMER LENDING.
Product Type: Real Estate Security



End of Report

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