



IAPD Report

THOMAS RUSH

CRD# 2451788

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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 RUSH (CRD# 2451788)

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 **11/19/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	CWM, LLC	CRD# 155344	11/11/2019

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
IA	LPL FINANCIAL LLC	6413	YUMA, AZ	09/25/2001 - 11/22/2019
B	LPL FINANCIAL LLC	6413	YUMA, AZ	08/31/2001 - 11/22/2019
IA	PRIVATE ADVISOR GROUP, LLC	155216	Yuma, AZ	01/12/2018 - 11/12/2019

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	4



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: **CWM, LLC**
Main Address: 14600 BRANCH ST.
OMAHA, NE 68154
Firm ID#: 155344

Regulator	Registration	Status	Date
IA Arizona	Investment Adviser Representative	Approved	11/13/2019
IA California	Investment Adviser Representative	Approved	01/21/2025
IA Texas	Investment Adviser Representative	Restricted Approval	11/11/2019

Branch Office Locations

CWM, LLC
182 E 16th St.
Suite D
Yuma, AZ 85364

CWM, LLC
1239 W Main Street
El Centro, CA 92243



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

Principal/Supervisory Exams

Exam	Category	Date
General Securities Sales Supervisor - General Module Examination (S10)	Series 10	12/02/2000
General Securities Sales Supervisor - Options Module Examination (S9)	Series 9	12/01/2000

General Industry/Product Exams

Exam	Category	Date
Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
Futures Managed Funds Examination (S31)	Series 31	03/02/1994
General Securities Representative Examination (S7)	Series 7	02/15/1994

State Securities Law Exams

Exam	Category	Date
Uniform Investment Adviser Law Examination (S65)	Series 65	12/16/1999
Uniform Securities Agent State Law Examination (S63)	Series 63	02/22/1994

PROFESSIONAL DESIGNATIONS

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

No information reported.



Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
IA	09/25/2001 - 11/22/2019	LPL FINANCIAL LLC	CRD# 6413	YUMA, AZ
B	08/31/2001 - 11/22/2019	LPL FINANCIAL LLC	CRD# 6413	YUMA, AZ
IA	01/12/2018 - 11/12/2019	PRIVATE ADVISOR GROUP, LLC	CRD# 155216	Yuma, AZ
B	01/10/2000 - 09/06/2001	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	NEW YORK, NY
B	02/16/1994 - 11/10/2000	DEAN WITTER REYNOLDS INC.	CRD# 7556	PURCHASE, 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
01/2025 - Present	Yuma & Imperial Valley Wealth Management	Founder, Wealth Advisor	Y	Yuma, AZ, United States
11/2019 - Present	CWM, LLC	Investment Advisor Representative	Y	Omaha, NE, United States
01/2001 - 01/2025	Yuma Investment Group	Founder & Wealth Advisor	Y	Yuma, AZ, United States
01/2018 - 11/2019	Private Advisor Group, LLC	Investment Adviser Representative	Y	Yuma, AZ, United States
08/2001 - 11/2019	LPL FINANCIAL LLC	REGISTERED REPRESENTATIVE	Y	YUMA, 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.

1. Youknowit LLC; Real Estate; 12/31/21; Partner; APPX. HRS/MONTH: 0; % HRS/MO DURING TRADING HOURS: 0
2. Rio Colorado Chapter Historical Board; Non-profit historical; 8/1/22; Board member; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 0; DUTIES: Board responsibilities
3. 1st Ave Downtown LLC; Real Estate; 8/17/23; Partner; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 0
4. Yuma Business Center LLC; Real Estate; 12/1/22; Silent member; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 0
5. Care Yuma LLC; Real Estate; 12/1/20; Owner; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 0



Registration & Employment History



OTHER BUSINESS ACTIVITIES

6. Downtown Mex LLC; Real Estate; 12/1/20; Partner; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 0
7. Tacna Ag Housing LLC; Real Estate; 2/10/21; Co-owner; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 0
8. Yuma Risk Management; Property Casualty Insurance; 8/13/17; Co-owner; APPX. HRS/MONTH: 2; % HRS/MO DURING TRADING HOURS: 0
9. Del Norte LLC; Real estate, 10/14/13; Owner; APPX. HRS/MONTH: 0; % HRS/MO DURING TRADING HOURS: 0
10. Barking Dog LLC; Real estate; 2/3/98; Owner; APPX. HRS/MONTH: 0; % HRS/MO DURING TRADING HOURS: 0
11. Main Street Yuma LLC; Real Estate; 9/14/18; Owner; APPX. HRS/MONTH: 0; % HRS/MO DURING TRADING HOURS: 0
12. Main Street Two LLC; Real Estate; 5/7/19; Owner; APPX. HRS/MONTH: 0; % HRS/MO DURING TRADING HOURS: 0
13. Malachite LLC; Real Estate; 2/8/05; Owner; APPX. HRS/MONTH: 0; % HRS/MO DURING TRADING HOURS: 0
14. R & R Coffee Truck Frenchies Coffee; Food truck; 6/1/21; Owner; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 0; Silent partner
15. Ed Foundation of Yuma; Non profit; 5/1/2021; Board member; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 0
16. Downtown D & R LLC; Real Estate; 10/1/2021; Owner; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 0
17. TMSI Family Trust; Various property, rentals, 100% owned by the trust; 9/8/15; Trustee; APPX. HRS/MONTH: 5; % HRS/MO DURING TRADING HOURS: 0; Trustee of trust, manager of the rentals and property owned by the trust
18. Better Yuma; Non-profit; 3/6/19; Board member treasurer; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 1; Bookkeeping with no access to funds or cash
19. Down Town R & R; Liquor license; 9/4/20; Owner; APPX. HRS/MONTH: 0; % HRS/MO DURING TRADING HOURS: 0; Hold liquor license
20. Sunset Bar & Grill LLC DBA Desert Penguin; Sports Bar & Food; 10/12/20; Owner; APPX. HRS/MONTH: 6; % HRS/MO DURING TRADING HOURS: 0; Managing partner
21. 251 Downtown LLC; Real Estate; 12/20/23; Owner; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 0; Oversee property manager
22. Foundation of Tucson Diocese Board; Non-profit; 8/1/24; Board member; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 0
23. IVWM Building LLC; Real Estate; 8/1/24; Owner; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 0
24. YIG LLC; Pass though; 8/4/20; Partner; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 0
25. Yig Corp LLC; Pass through; 8/3/20; Owner; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 0
26. 224 Downtown LLC; Real Estate; 3/26/25; Owner; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 0
27. 575 W. Chandler LLC; Real Estate; 9/1/25; Partner; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 0
28. Yuma Tax Group LLC; Tax service; 10/1/25; Passive owner; APPX. HRS/MONTH: 1; % HRS/MO DURING TRADING HOURS: 1; Passive investor
29. Insurance; 8/23/06; APPX. HRS/MONTH: 3; % HRS/MO DURING TRADING HOURS: 1; INSURANCE AGENT; Sells Life, Health, Disability, Annuities & LTC



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	4

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 4

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	LPL FINANCIAL LLC
Allegations:	CUSTOMER ALLEGED REPRESENTATIVE MISREPRESENTED REITS. ACTIVITY PERIOD: 6/4/14 TO 1/26/16.
Product Type:	Real Estate Security
Alleged Damages:	\$43,000.00
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:	08/09/2016
Complaint Pending?	No
Status:	Denied
Status Date:	09/12/2016

Settlement Amount:

Individual Contribution Amount:



Disclosure 2 of 4

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: LPL FINANCIAL LLC

Allegations: CUSTOMER ALLEGED UNSUITABILITY AND MISREPRESENTATION IN CONNECTION WITH THE SALE OF TWO NON-TRADED REITS. ACTIVITY PERIOD: 4/17/14 TO 6/6/14.

Product Type: Real Estate Security

Alleged Damages: \$50,000.00

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: 02/19/2015

Complaint Pending? No

Status: Denied

Status Date: 03/05/2015

Settlement Amount:

Individual Contribution Amount:

Disclosure 3 of 4

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: MERRILL LYNCH

Allegations: CLIENTS ALLEGE MR. RUSH MISREPRESENTED FACTS AND DID NOT FOLLOW INSTRUCTIONS. NO DAMAGES SPECIFIED.

Product Type: Mutual Fund(s)

Alleged Damages: \$0.00

Customer Complaint Information

Date Complaint Received: 06/13/2002

Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:

.....

Reporting Source: Individual



Employing firm when activities occurred which led to the complaint: MERRILL LYNCH

Allegations: CLIENTS ALLEGE MR.RUSH MISREPRESENTED FACTS AND DID NOT FOLLOW INSTRUCTIONS. NO DAMAGES SPECIFIED, BUT BELIEVED TO BE MORE THAN \$5000.

Product Type: Mutual Fund(s)

Alleged Damages:

Customer Complaint Information

Date Complaint Received: 06/13/2002

Complaint Pending? No

Status: Closed/No Action

Status Date: 08/17/2005

Settlement Amount:

Individual Contribution Amount:

Disclosure 4 of 4

Reporting Source: Regulator

Employing firm when activities occurred which led to the complaint: MERRILL LYNCH PIERCE FENNER & SMITH INC.

Allegations: UNAUTHORIZED TRADING, UNSUITABLE RECOMMENDATION, AND VIOLATION OF FIDUCIARY DUTIES.

Product Type: Other

Other Product Type(s): STOCKS

Alleged Damages: \$221,071.42

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: [NASD - CASE #02-02395](#)

Date Notice/Process Served: 04/24/2002

Arbitration Pending? No

Disposition: Award

Disposition Date: 10/23/2003

Disposition Detail: RESPONDENT IS REQUIRED TO DISGORGE HIS SHARE OF THE COMMISSIONS COLLECTED FROM CLAIMANTS DURING THE LIFE OF THE ACCOUNT WITH MEMBER FIRM. THE AMOUNT HAS BEEN DETERMINED TO BE \$2,349, WHICH RESPONDENT IS INDIVIDUALLY TO PAY TO CLAIMANTS.

Reporting Source: Firm



Employing firm when activities occurred which led to the complaint: MERRILL LYNCH, PIERCE, FENNER & SMITH INC.

Allegations: CUSTOMERS ALLEGE UNAUTHORIZED TRADING AND UNSUITABLE INVESTMENTS.

Product Type: Equity - OTC

Alleged Damages: \$221,071.42

Customer Complaint Information

Date Complaint Received: 05/14/2002

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 05/14/2002

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: [NASD-DR NO.: 02-02395](#)

Date Notice/Process Served: 05/14/2002

Arbitration Pending? No

Disposition: Award to Customer

Disposition Date: 10/22/2003

Monetary Compensation Amount: \$14,355.08

Individual Contribution Amount: \$2,349.00

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: MERRILL LYNCH, PIERCE, FENNER & SMITH INC.

Allegations: CUSTOMERS ALLEGE UNAUTHORIZED TRADING AND UNSUITABLE INVESTMENTS.

Product Type: Equity-OTC

Alleged Damages: \$221,071.42

Customer Complaint Information

Date Complaint Received: 05/14/2002

Complaint Pending? No

Status: Arbitration Award/Monetary Judgment (for claimants/plaintiffs)

Status Date: 05/14/2002



Settlement Amount: \$14,355.08

Individual Contribution Amount: \$2,349.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA

Docket/Case #: [02-02395](#)

Date Notice/Process Served: 05/14/2002

Arbitration Pending? No

Disposition: Award to Customer

Disposition Date: 10/23/2003

Monetary Compensation Amount: \$14,355.08

Individual Contribution Amount: \$2,349.00



End of Report

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