



IAPD Report

MARK RAYMOND PALMER

CRD# 2546710

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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

MARK RAYMOND PALMER (CRD# 2546710)

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 **10/10/2025**.

CURRENT EMPLOYERS

| | Firm | CRD# | Registered Since |
|----|---------------------------|-------------|------------------|
| IA | EDELMAN FINANCIAL ENGINES | CRD# 104510 | 11/01/2018 |

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **2** 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 | EDELMAN FINANCIAL SERVICES, LLC | 113299 | WALNUT CREEK, CA | 08/11/2015 - 11/01/2018 |
| B | EF LEGACY SECURITIES, LLC | 269923 | WALNUT CREEK, CA | 04/22/2016 - 10/31/2018 |
| B | SANDERS MORRIS HARRIS LLC | 20580 | SANTA CLARA, CA | 08/11/2015 - 04/22/2016 |

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 | 2 |





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 **2** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **EDELMAN FINANCIAL ENGINES**
Main Address: 3945 FREEDOM CIRCLE
SANTA CLARA, CA 95054
Firm ID#: 104510

| | Regulator | Registration | Status | Date |
|--|------------|-----------------------------------|----------|------------|
|  | California | Investment Adviser Representative | Approved | 11/01/2018 |
|  | Texas | Investment Adviser Representative | Approved | 06/04/2019 |

Branch Office Locations

EDELMAN FINANCIAL ENGINES
2175 NORTH CALIFORNIA BOULEVARD
SUITE 800
Walnut Creek, CA 94596

EDELMAN FINANCIAL ENGINES
3950 CIVIC CENTER DRIVE
SUITE 315
SAN RAFAEL, CA 95903

EDELMAN FINANCIAL ENGINES
3945 FREEDOM CIR
SUITE 450
SANTA CLARA, CA 95054

EDELMAN FINANCIAL ENGINES
370 DIABLO ROA
SUITE 201
DANVILLE, CA 94526



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

Principal/Supervisory Exams

| Exam | Category | Date |
|--|-----------|------------|
| General Securities Principal Examination (S24) | Series 24 | 06/22/2004 |

General Industry/Product Exams

| Exam | Category | Date |
|--|----------|------------|
| Securities Industry Essentials Examination (SIE) | SIE | 10/01/2018 |
| Non-Member General Securities Examination (S2) | Series 2 | 07/28/1995 |
| General Securities Representative Examination (S7) | Series 7 | 10/03/1994 |

State Securities Law Exams

| Exam | Category | Date |
|--|-----------|------------|
| Uniform Securities Agent State Law Examination (S63) | Series 63 | 03/02/2015 |
| Uniform Investment Adviser Law Examination (S65) | Series 65 | 02/12/1998 |

PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **1** professional designation(s).

Certified Financial Planner

This representative holds or did hold **1** professional designation(s) that may have been used to qualify as an Investment Advisor representative. Please check with the appropriate designation authority for verification that the designation is still in effect. The contact information for these professional designation authorities can be found on the website for the North American Securities Administrators Association at <http://www.nasaa.org>



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 | 08/11/2015 - 11/01/2018 | EDELMAN FINANCIAL SERVICES, LLC | CRD# 113299 | WALNUT CREEK, CA |
| B | 04/22/2016 - 10/31/2018 | EF LEGACY SECURITIES, LLC | CRD# 269923 | WALNUT CREEK, CA |
| B | 08/11/2015 - 04/22/2016 | SANDERS MORRIS HARRIS LLC | CRD# 20580 | SANTA CLARA, CA |
| B | 02/23/2015 - 08/06/2015 | UNIONBANC INVESTMENT SERVICES, LLC | CRD# 14455 | SAN FRANCISCO, CA |
| IA | 01/08/2015 - 08/06/2015 | UNIONBANC INVESTMENT SERVICES, LLC | CRD# 14455 | SAN FRANCISCO, CA |
| IA | 11/17/2010 - 12/10/2013 | PRESIDIO CAPITAL ADVISORS LLC | CRD# 108531 | SAN FRANCISCO, CA |
| B | 07/02/2012 - 12/17/2012 | PRESIDIO MERCHANT PARTNERS LLC | CRD# 46473 | SAN FRANCISCO, CA |
| B | 03/27/2007 - 10/13/2010 | CHARLES SCHWAB & CO., INC. | CRD# 5393 | SAN FRANCISCO, CA |
| IA | 03/27/2007 - 10/13/2010 | CHARLES SCHWAB & CO., INC. | CRD# 5393 | SAN FRANCISCO, CA |
| B | 06/14/2004 - 09/29/2006 | COMERICA SECURITIES | CRD# 17079 | SAN FRANCISCO, CA |
| IA | 06/14/2004 - 09/29/2006 | COMERICA SECURITIES | CRD# 17079 | SAN FRANCISCO, CA |
| B | 05/02/2001 - 05/05/2003 | WELLS FARGO INVESTMENTS, LLC | CRD# 10582 | SAN FRANCISCO, CA |
| IA | 04/06/1998 - 05/05/2003 | WELLS FARGO INVESTMENTS, LLC | CRD# 10582 | SAN FRANCISCO, CA |
| B | 09/22/1995 - 05/02/2001 | WELLS FARGO SECURITIES INC. | CRD# 17438 | SAN FRANCISCO, CA |
| B | 10/07/1994 - 07/25/1995 | WELLS FARGO SECURITIES INC. | CRD# 17438 | SAN FRANCISCO, 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 |
|-------------------|-----------------------------------|--|--------------------|--------------------------------|
| 01/2022 - Present | FINANCIAL ENGINES ADVISORS L.L.C. | EXECUTIVE DIRECTOR, FINANCIAL PLANNING | Y | SANTA CLARA, CA, United States |
| 11/2018 - 01/2022 | FINANCIAL ENGINES ADVISORS L.L.C. | DIRECTOR, FINANCIAL PLANNING | Y | SUNNYVALE, CA, United States |
| 08/2015 - 11/2018 | EDELMAN FINANCIAL SERVICES LLC | ASSOCIATE DIRECTOR FINANCIAL PLANNING | Y | FAIRFAX, VA, United States |
| 04/2016 - 10/2018 | EF LEGACY SECURITIES, LLC | REGISTERED REPRESENTATIVE | Y | HENRICO, VA, 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) N/A; INVESTMENT RELATED: No; ADDRESS: San Francisco, CA; NATURE: Pro Bono work; POSITION: Solo Attorney; START DATE: 02/03/2014; NUMBER OF HOURS/MONTH: 02 Hrs.; HOURS/MNTH DURING SECURITIES TRADING HOURS: 0 Hrs.; DUTIES: Pro Bono work.
- 2) Mgrublian Center for Human Rights at Claremont McKenna College; INVESTMENT RELATED: No; ADDRESS: 850 Columbia Avenue, Claremont, CA, 91711; NATURE: The Center promotes the study of Human Rights, with a particular focus on genocide. It sponsors study, programs, authorship, and internships for college students.; POSITION: Advisory Board Member; START DATE: 08/15/2014; NUMBER OF HOURS/MONTH: 03 Hrs.; HOURS/MNTH DURING SECURITIES TRADING HOURS: 0 Hrs.; DUTIES: No powers. No duties. We discuss ideas and make recommendations, sometimes the director and team implement. One of those has essentially become a clinic in human rights law.
- 3) Smulin Contemporary Ballet; INVESTMENT RELATED: No; ADDRESS: 1830 17th St., San Francisco, CA 94103; NATURE: A ballet company; POSITION: Member of Marketing Committee; START DATE: 06/01/2021; NUMBER OF HOURS/MONTH: 03 Hrs.; HOURS/MNTH DURING SECURITIES TRADING HOURS: 0 Hrs.; DUTIES: Help think of ways to broaden attendance and support.



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 | 2 |

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: | WELLS FARGO SECURITIES INC. |
| Allegations: | CLIENT ALLEGED UNAUTHORIZED TRADE IN INVESTMENT OF CORPORATE BOND. |
| Product Type: | Debt - Corporate |
| Alleged Damages: | \$5,625.00 |

Customer Complaint Information

| | |
|---------------------------------|------------|
| Date Complaint Received: | 08/04/1999 |
| Complaint Pending? | No |
| Status: | Denied |
| Status Date: | 09/15/1999 |

Settlement Amount:

Individual Contribution Amount:

Broker Statement

IN A MEETING WITH ANOTHER INVESTMENT PROFESSIONAL AND ME, CLIENT REVIEW THE BOND AND AUTHORIZED THE BUYING OF IT, AS CONFIRMED BY THE OTHER PROFESSIONAL (WHO ACTUALLY PLACED THE TRADE). UPON RECEIVING THE CONFIRMATION, THE CLIENT MADE NO OBJECTION TO THE PURCHASE. ONLY FOLLOWING THE RECEIPT OF HIS STATEMENT SHOWING THE DECREASE IN VALUE DUE TO INTEREST RATE INCREASES DID THE CLIENT BEGIN TO ALLEGE THE TRADE WAS



UNAUTHORIZED.

Disclosure 2 of 2

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: WELLS FARGO SECURITIES, INC.

Allegations: CLIENT ALLEGED UNAUTHORIZED TRADES IN INVESTMENTS OF STAGECOACH LIFEPATH 2040 AND COMPETITIVE EDGE STEP RESULTING IN ALLEGED LOSS OF \$13,392.00.

Product Type: Equity Listed (Common & Preferred Stock)
Mutual Fund

Alleged Damages: \$13,392.00

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: 10/09/1998

Complaint Pending? No

Status: Closed/No Action

Status Date: 11/01/1998

Settlement Amount: \$0.00

Individual Contribution Amount: \$0.00

Broker Statement CLAIM DENIED.
I WORKED WITH THE CLIENT FOR OVER A YEAR WITHOUT COMPLAINT OR PROBLEM. BASED UPON HER INSTRUCTION WE DIVIDED AND REINVESTED HER ASSETS INTO THREE TRUST ACCOUNTS PER HER ESTATE PLANNING ATTORNEY'S ADVICE. OVER THE SUBSEQUENT THREE WEEKS WE MET OR SPOKE 5-6 TIMES. SHE WAS HAPPY AND EXPRESSED APPRECIATION. ON OCTOBER 2ND THE EQUITY MARKET DROPPED SIGNIFICANTLY. WITHOUT NOTICE THE CLIENT'S DAUGHTER CALLED OUR CENTRAL OFFICE TO COMPLAIN. FROM TRADE TO TRANSFER OUT, THE CLIENT'S ACCOUNTS ACTUALLY APPRECIATED BY OVER \$3,000: THERE WAS NO LOSS.



End of Report

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