



IAPD Report

BRUCE EDWIN GRAHAM

CRD# 2563258

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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

BRUCE EDWIN GRAHAM (CRD# 2563258)

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 **08/28/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	B.B. GRAHAM & COMPANY, INC.	CRD# 41533	05/01/1997
IA	GRAHAM & CO. ADVISORY, INC.	CRD# 123539	09/29/2003
IA	B.B. GRAHAM & COMPANY, INC.	CRD# 41533	09/25/2007

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **27** 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 INTERFIRST CAPITAL CORPORATION	7659	LOS ANGELES, CA	04/06/1995 - 05/09/1997

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	6



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

Employment 1 of 2

Firm Name: **B.B. GRAHAM & COMPANY, INC.**

Main Address: 1700 W. KATELLA AVE.
ORANGE, CA 92867

Firm ID#: 41533

Regulator	Registration	Status	Date
B FINRA	General Securities Principal	Approved	05/01/1997
B FINRA	General Securities Representative	Approved	05/01/1997
B FINRA	Registered Options Principal	Approved	05/01/1997
B FINRA	Financial and Operations Principal	Approved	03/13/2003
B FINRA	Operations Professional	Approved	12/09/2011
B Alaska	Agent	Approved	04/01/2002
IA Alaska	Investment Adviser Representative	Approved	11/17/2023
B Arizona	Agent	Approved	01/26/2024
IA Arizona	Investment Adviser Representative	Approved	01/26/2024
B Arkansas	Agent	Approved	09/12/2024
B California	Agent	Approved	05/09/1997
IA California	Investment Adviser Representative	Approved	09/25/2007
B Colorado	Agent	Approved	05/23/1997



Qualifications

Regulator	Registration	Status	Date
B Connecticut	Agent	Approved	09/06/2016
B Florida	Agent	Approved	06/26/1997
IA Florida	Investment Adviser Representative	Approved	06/28/2023
B Hawaii	Agent	Approved	12/14/2023
IA Hawaii	Investment Adviser Representative	Approved	12/14/2023
B Idaho	Agent	Approved	06/07/2023
IA Idaho	Investment Adviser Representative	Approved	06/07/2023
B Illinois	Agent	Approved	05/29/1997
IA Illinois	Investment Adviser Representative	Approved	12/17/2007
B Indiana	Agent	Approved	08/22/1997
IA Indiana	Investment Adviser Representative	Approved	06/09/2023
IA Kansas	Investment Adviser Representative	Approved	06/16/2025
B Massachusetts	Agent	Approved	09/26/2003
B Michigan	Agent	Approved	06/22/2012
IA Montana	Investment Adviser Representative	Approved	11/17/2023
B Nevada	Agent	Approved	05/12/1997
IA Nevada	Investment Adviser Representative	Approved	11/21/2023
B New Jersey	Agent	Approved	06/06/1997
B New York	Agent	Approved	09/25/1997



Qualifications

Regulator	Registration	Status	Date
B Ohio	Agent	Approved	03/28/2025
B Oregon	Agent	Approved	05/27/1997
B Pennsylvania	Agent	Approved	08/20/1998
IA Pennsylvania	Investment Adviser Representative	Approved	06/09/2023
IA South Carolina	Investment Adviser Representative	Approved	06/18/2025
B Texas	Agent	Approved	06/24/1997
IA Texas	Investment Adviser Representative	Approved	06/02/2008
B Virginia	Agent	Approved	08/15/1997
B Washington	Agent	Approved	10/21/1997
IA Washington	Investment Adviser Representative	Approved	06/08/2023
B Wisconsin	Agent	Approved	06/26/1997
IA Wyoming	Investment Adviser Representative	Approved	11/17/2023

Branch Office Locations

B.B. GRAHAM & COMPANY, INC.
1700 W. KATELLA AVE.
ORANGE, CA 92867

B.B. GRAHAM & COMPANY, INC.
1700 W KATELLA AVE
ORANGE, CA 92867

Employment 2 of 2

Firm Name: **GRAHAM & CO. ADVISORY, INC.**
Main Address: 1700 WEST KATELLA AVENUE
SECOND FLOOR
ORANGE, CA 92867-3415
Firm ID#: 123539



Qualifications

Regulator	Registration	Status	Date
IA California	Investment Adviser Representative	Approved	09/29/2003

Branch Office Locations

GRAHAM & CO. ADVISORY, INC.
1700 WEST KATELLA AVENUE
SECOND FLOOR
ORANGE, CA 92867-3415

GRAHAM & CO. ADVISORY, INC.
1700 WEST KATELLA AVENUE
SECOND FLOOR
ORANGE, CA 92867-3415



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

Principal/Supervisory Exams

Exam	Category	Date
 Financial and Operations Principal Examination (S27)	Series 27	03/11/2003
 General Securities Principal Examination (S24)	Series 24	09/13/1996
 Registered Options Principal Examination (S4)	Series 4	06/05/1996

General Industry/Product Exams

Exam	Category	Date
 Operations Professional Examination (S99TO)	Series 99TO	01/02/2023
 Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
 General Securities Representative Examination (S7)	Series 7	03/31/1995

State Securities Law Exams

Exam	Category	Date
 Uniform Investment Adviser Law Examination (S65)	Series 65	02/03/2000
 Uniform Securities Agent State Law Examination (S63)	Series 63	03/28/1995

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 04/06/1995 - 05/09/1997	INTERFIRST CAPITAL CORPORATION	CRD# 7659	LOS ANGELES, CA

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
07/2003 - Present	GRAHAM & CO. ADVISORY, INC.	PRESIDENT, IA REPRESENTATIVE	Y	Orange, CA, United States
07/1996 - Present	B.B. GRAHAM & COMPANY, INC.	PRESIDENT - PRESIDENT	Y	ORANGE, CA, 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. Graham & Co. Advisory, 100% Owner, 1700 KATELLA Ave. Orange Ca, less than 20% per week, Investment-related; Fee Based Advisory Business.
2. 1700 KATELLA LLC, 100% OWNER, LESS THAN 10 HOURS PER MONTH, NON SECURITIES RELATED.
3. ECG AVIATION, 100% OWNER, LESS THAN AN HOUR A WEEK. PROVIDES AIRCRAFT MANAGEMENT FOR AIRCRAFT OWNED BY BRUCE GRAHAM. NON SECURITIES RELATED
4. Historic Aircraft Preservation, Chino airport, 100% Owner, Non-securities related, Restoration of WWII aircraft, Less than 5% per week.
5. Graham Air Storage, Chino Airport CA, 100% Owner, Non-securities related, Aircraft Storage, less than 5% per week.



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	6

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 6

Reporting Source:	Regulator
Employing firm when activities occurred which led to the complaint:	B.B. GRAHAM & COMPANY, INC.
Allegations:	CHURNING; UNSUITABILITY; NEGLIGENCE; NEGLIGENT MISREPRESENTATION; INTENTIONAL MISREPRESENTATION; BREACH OF CONTRACT; ELDER ABUSE; UNFAIR OR DECEPTIVE PRACTICES AGAINST SENIOR CITIZENS
Product Type:	Other
Other Product Type(s):	DISCRETIONARY ACCOUNTS INCLUDING BUT NOT LIMITED TO ANNUITIES AND OPTIONS
Alleged Damages:	\$979,676.00
Arbitration Information	
Arbitration/Reparation Claim filed with and Docket/Case No.:	NASD - CASE #06-03917
Date Notice/Process Served:	08/25/2006
Arbitration Pending?	No
Disposition:	Award
Disposition Date:	12/10/2007
Disposition Detail:	THE PANEL DENIES CLAIMANTS' CLAIMS EXCEPT FOR CLAIMS BASED ON BREACH OF CONTRACT; UNSUITABILITY; CHURNING; NEGLIGENCE. GRAHAM IS JOINTLY AND SEVERALLY LIABLE TO AND SHALL PAY



CLAIMANTS \$171,000 IN COMPENSATORY DAMAGES.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: B. B. GRAHAM & CO.

Allegations: 11/11/2004 THROUGH 02/07/2006, CLIENTS BROUGHT IN 3,000,000 IN ACCOUNTS THROUGH BROKER JOHN WALTHALL, BRUCE GRAHAM HAD TRADING AUTHORITY. THEY ARE CLAIMING THEY LOST 150,000 AND PAID TOO MANY TAXES AND COMMISSIONS. IN MAY 2005, THEY PURCHASED A FIXED ANNUITY FROM JOHN WALTHALL, AND ARE CLAIMING INCREASED TAX LIABILITY, TOO MANY COMMISSIONS, AND UNSUITABILITY.

Product Type: Annuity(ies) - Fixed

Other Product Type(s): EQUITIES, COVERED CALLS, MUTUAL FUNDS

Alleged Damages: \$979,676.00

Customer Complaint Information

Date Complaint Received: 09/25/2006

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 09/29/2006

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: [NASD, 06-03917](#)

Date Notice/Process Served: 09/25/2006

Arbitration Pending? No

Disposition: Award to Customer

Disposition Date: 12/10/2007

Monetary Compensation Amount: \$243,377.44

Individual Contribution Amount: \$0.00

Broker Statement B.B. GRAHAM & CO., BRUCE GRAHAM, AND JOHN WALTHALL JOINTLY AND SEVERALLY LIABLE FOR 243377.44.

Disclosure 2 of 6

Reporting Source: Regulator

Employing firm when activities occurred which led to the complaint: B.B. GRAHAM & COMPANY, INC.



Allegations: UNSUITABILITY; BREACH OF FIDUCIARY DUTY; MISREPRESENTATION; UNAUTHORIZED USE OF MARGIN

Product Type: Other

Other Product Type(s): UNKNOWN TYPES OF SECURITIES

Alleged Damages: \$20,000.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: [NASD - CASE #03-08724](#)

Date Notice/Process Served: 12/10/2003

Arbitration Pending? No

Disposition: Award

Disposition Date: 09/29/2004

Disposition Detail: RESPONDENT IS JOINTLY AND SEVERALLY LIABLE TO AND SHALL PAY CLAIMANT \$10,000 IN COMPENSATORY DAMAGES, PLUS INTEREST.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: B.B. GRAHAM & CO.

Allegations: UNSUITABLE INVESTMENTS. BETWEEN 9, 2000 AND 9, 2001, CLIENT LOST MOST OF ACCOUNT EQUITY DURING THE 2000-2001 BEAR MARKET.

Product Type: Equity - OTC

Other Product Type(s): COVERED CALL OPTIONS

Alleged Damages: \$20,000.00

Customer Complaint Information

Date Complaint Received: 12/18/2003

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 12/18/2003

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: [NASD, 03-08724LA](#)

Date Notice/Process Served: 12/18/2003

Arbitration Pending? No

Disposition: Award to Customer

Disposition Date: 09/29/2004



Monetary Compensation Amount: \$12,100.00

Individual Contribution Amount: \$0.00

Disclosure 3 of 6

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: B.B. GRAHAM & CO.

Allegations: CLIENT ALLEGES UNSUITABLE INVESTMENTS. CLIENT LOST ABOUT 52,000.00 FROM OCTOBER 1999 UNTIL MAY 2002.

Product Type: Equity - OTC

Other Product Type(s): EQUITY-LISTED, AND OPTIONS

Alleged Damages: \$74,500.00

Customer Complaint Information

Date Complaint Received: 10/01/2003

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 10/07/2004

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD, CASE 04-06938

Date Notice/Process Served: 10/07/2004

Arbitration Pending? No

Disposition: Settled

Disposition Date: 07/08/2005

Monetary Compensation Amount: \$40,500.00

Individual Contribution Amount: \$0.00

Broker Statement: CASE WAS SETTLED AND ALL CLAIMS WERE DROPPED AGAINST BRUCE GRAHAM, DONALD CONDIT, AND B.B. GRAHAM & CO. AS PART OF THE SETTLEMENT

Disclosure 4 of 6

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: B.B. GRAHAM & CO.



Allegations: CLIENT CLAIMS UNAUTHORIZED TRADING FOR LOSSES SUSTAINED DURING THE 2001 BEAR MARKET. 7-01-2001. LOST MONEY IN STOCK POSITIONS SHE ALLEGES THAT SHE DIDN'T KNOW ABOUT.

Product Type: Equity Listed (Common & Preferred Stock)

Alleged Damages: \$15,000.00

Customer Complaint Information

Date Complaint Received: 02/13/2001

Complaint Pending? No

Status: Settled

Status Date: 10/01/2003

Settlement Amount: \$12,500.00

Individual Contribution Amount: \$0.00

Disclosure 5 of 6

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: B.B. GRAHAM & COMPANY, INC.

Allegations: RE:COUNTERCLAIM 02/02/98 THE [CUSTOMERS] ET.AL CLAIMED THE FOLLOWING;A.) SECURITIES FRAUD; B.) COMMON LAW FRAUD. C) BREACH OF FIDUCIARY RESPONSIBILITIES D)BREACH OF DUTY OF GOOD FAITH & FAIR DEALING E) NEGLIGENCE F) RULE VIOLATIONS G) BREACH OF CONTRACT H) FAILURE TO SUPERVISE I) RESPONDENT SUPERIOR J)SECURITIES LAW VIOLATIONS THE [CUSTOMERS] CLAIM \$800,000 IN DAMAGES.

Product Type: Options

Alleged Damages: \$800,000.00

Customer Complaint Information

Date Complaint Received: 02/02/1998

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 02/25/1999

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD; 97-05384

Date Notice/Process Served: 02/02/1998

Arbitration Pending? No

Disposition: Settled



Disposition Date: 02/25/1999
Monetary Compensation Amount: \$40,000.00
Individual Contribution Amount: \$0.00
Broker Statement
CLAIMANT (BB GRAHAM) PAID TO [CUSTOMERS] THE TOTAL SUM OF \$40,000. THE RESPONDENTS ([CUSTOMERS]) HEREBY DISMISS AND WITHDRAW ALL CLAIMS AGAINST BRUCE GRAHAM. ALL SHARES MENTIONED IN #7 ABOVE ARE DISMISSED PURSUANT TO THE SETTLEMENT.
NOT PROVIDED

Disclosure 6 of 6

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: INTERFIRST SECURITIES
Allegations: CUSTOMER COMPLAINTED THAT I (BRUCE EDWIN GRAHAM) FAILED TO PLACE A MARKET ORDER INSTEAD OF A REQUESTED MARKET ORDER. THIS ISSUE WAS IMMEDIATELY SETTLED AND WAS A EXECUTION ISSUE ONLY. THIS WAS NEVER A SALES PRACTICE VIOLATION ISSUE AND WAS REPORTED IN ERROR. MR GRAHAM IMMEDIATELY PAID [CUSTOMER] \$76,268 AND THE COMPLAINT WAS WITHDRAWN. THIS HAS BEEN DISCUSSED WITH [NASD REPRESENTATIVE] (NASD DISCLOSURE SPECIALIST CASE # 136384)AND WE ASK THAT THIS BE REMOVED FROM MR. GRAHAMS FILE. QUESTIONS SHOULD BE DIRECTED TO [THIRD PARTY] (CFO) AT 714-245-5116. QUESTION 23(I)(C)ANSWERED ONLY BECAUSE U-4 COMPLETENESS CHECK REQUIRED IT. PLEASE REMOVE FROM MR. GRAHAMS FILE.

Product Type: Options

Alleged Damages:

Customer Complaint Information

Date Complaint Received: 01/31/1997
Complaint Pending? No
Status: Settled
Status Date: 02/26/1997
Settlement Amount: \$76,267.63
Individual Contribution Amount: \$76,267.63



End of Report

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