



## IAPD Report

### ANIL B VAZIRANI

CRD# 2625109

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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

### ANIL B VAZIRANI (CRD# 2625109)

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 **01/13/2023**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	VIRTUE CAPITAL MANAGEMENT, LLC	CRD# 167816	09/27/2018

### QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **1** 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	HORTER INVESTMENT MANAGEMENT, LLC	119880	SCOTTSDALE, AZ	07/20/2015 - 10/01/2018
IA	BROOKSTONE CAPITAL MANAGEMENT LLC	141413	SCOTTSDALE, AZ	06/13/2008 - 07/02/2015
B	USA FINANCIAL SECURITIES CORPORATION	103857	ADA, MI	10/01/2003 - 03/11/2004

For additional registration and employment history details as reported by the individual, refer to the Registration and Employment History section of the Detailed Report.

### DISCLOSURE INFORMATION

Disclosure events include certain criminal charges and convictions, formal investigations and disciplinary actions initiated by regulators, customer disputes and arbitrations, and financial disclosures such as bankruptcies and unpaid judgments or liens.

Are there events disclosed about this representative? **Yes**

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	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 **1** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

#### Employment 1 of 1

Firm Name: **VIRTUE CAPITAL MANAGEMENT, LLC**

Main Address: 6 CADILLAC DR.  
SUITE 310  
BRENTWOOD, TN 37027

Firm ID#: 167816

Regulator	Registration	Status	Date
IA Arizona	Investment Adviser Representative	Approved	09/27/2018

#### Branch Office Locations

##### **VIRTUE CAPITAL MANAGEMENT, LLC**

14301 N 87th Street  
Suite 213  
Scottsdale, AZ 85260



## Qualifications

### PASSED INDUSTRY EXAMS

This section includes all industry exams that the representative has passed. Under limited circumstances, a representative may attain registration after receiving an exam waiver based on a combination of exams the representative has passed and qualifying work experience. Likewise a new exam requirement may be grandfathered based on a representative's specific qualifying work experience. Exam waivers and grandfathering are not included below.

**This individual has passed 1 principal/supervisory exam, 1 general industry/product exam, and 2 state securities law exams.**

#### Principal/Supervisory Exams

Exam	Category	Date
 Investment Company Products/Variable Contracts Principal Examination (S26)	Series 26	08/23/2001

#### General Industry/Product Exams

Exam	Category	Date
 Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	09/29/1995

#### State Securities Law Exams

Exam	Category	Date
 Uniform Investment Adviser Law Examination (S65)	Series 65	06/01/2008
 Uniform Securities Agent State Law Examination (S63)	Series 63	08/31/1995

### 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
IA	07/20/2015 - 10/01/2018	HORTER INVESTMENT MANAGEMENT, LLC	CRD# 119880	SCOTTSDALE, AZ
IA	06/13/2008 - 07/02/2015	BROOKSTONE CAPITAL MANAGEMENT LLC	CRD# 141413	SCOTTSDALE, AZ
B	10/01/2003 - 03/11/2004	USA FINANCIAL SECURITIES CORPORATION	CRD# 103857	ADA, MI
B	10/02/1995 - 09/20/2002	MUTUAL OF OMAHA INVESTOR SERVICES, INC.	CRD# 611	OMAHA, NE

### EMPLOYMENT HISTORY

Below is the representative's employment history for up to the last 10 years.

Employment Dates	Employer Name	Position	Investment Related	Employer Location
09/2018 - Present	Virtue Capital Management, LLC	Investment Adviser Representative	Y	BRENTWOOD, TN, United States
01/2003 - Present	SECURED FINANCIAL SOLUTIONS	PRESIDENT AND CEO	Y	SCOTTSDALE, AZ, United States
10/2002 - Present	VAZIRANI & ASSOCIATES	PRESIDENT	Y	SCOTTSDALE, AZ, United States
07/2015 - 09/2018	HORTER INVESTMENT MANAGEMENT	INVESTMENT ADVISOR REPRESENTATIVE	Y	CINCINNATI, OH, 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) VAZIRANI & ASSOCIATES. , Title: INSURANCE ADVISOR- PRESIDENT/CEO. , Description: ASSISTING EXISTING NEW CLIENTS WITH THE PURCHASE OF INSURANCE RELATED PRODUCTS. , Start Date: 08-01-2002, Address: 14301 N. 87TH STR., #213, SCOTTSDALE, AZ 85260 , Investment-related? YES, Hours per month: 160, During trading hours: 160

(2) SECURED FINANCIAL SOLUTIONS, Title: PRESIDENT/CEO, Description: SALES OF FINANCIAL PRODUCTS, INSURANCE/OWNER AND OPERATOR RUNS APPOINTMENTS WITH CLIENTS, MARKETING, AND MANAGE DAY TO DAY BUSINESS, Start Date: 08-01-2002, Address: 14301 N 87TH STREET SUITE 213 SCOTTSDALE, AZ 85260, Investment-related? NO, Hours per month: 35, During trading hours: 35



## Disclosure Summary

### Disclosure Information

#### What you should know about reported disclosure events:

##### (1) Certain thresholds must be met before an event is reported to IARD, for example:

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

##### (2) Disclosure events in IAPD reports come from different sources:

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

##### (3) There are different statuses and dispositions for disclosure events:

- A disclosure event may have a status of *pending*, *on appeal*, or *final*.
  - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
  - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
  - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
  - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
  - A "settled" matter generally represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
  - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

##### (4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.



## DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	6

### Regulatory Event

This disclosure event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a federal regulator such as the Securities and Exchange Commission or the Commodities Futures Trading Commission, or a foreign financial regulatory body) for a violation of investment-related rules or regulations. This disclosure event may also include a revocation or suspension of an Investment Adviser Representative's authority to act as an attorney, accountant or federal contractor.

#### Disclosure 1 of 6

<b>Reporting Source:</b>	Individual
<b>Regulatory Action Initiated By:</b>	ARIZONA DEPARTMENT OF INSURANCE
<b>Sanction(s) Sought:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Date Initiated:</b>	10/11/2018
<b>Docket/Case Number:</b>	18A-135-INS
<b>Employing firm when activity occurred which led to the regulatory action:</b>	HORTER INVESTMENT MANAGEMENT
<b>Product Type:</b>	No Product
<b>Allegations:</b>	UNINTENTIONAL FAILURE TO TIMELY REPORT REGULATORY ACTION
<b>Current Status:</b>	Final
<b>Resolution:</b>	Consent
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	10/18/2018
<b>Sanctions Ordered:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Monetary Sanction 1 of 1</b>	
<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)



**Total Amount:** \$750.00

**Portion Levied against individual:** \$750.00

**Payment Plan:** check in the amount of \$750

**Is Payment Plan Current:** Yes

**Date Paid by individual:** 10/18/2018

**Was any portion of penalty waived?** No

**Amount Waived:**

**Broker Statement**

This was an administrative action that was generated from a 2012 FINRA registration issue that has been previously explained to each department of insurance in appropriate states where the individual is licensed. As you can see in the resolution the AZ department of insurance states that individual's failure to timely report these regulatory actions was not intentional. This was not initiated by any consumer complaint and all attempts were made in good faith to properly disclose the event. Individual has active resident insurance license in AZ and active non-resident insurance license in over 42 states, and is in good standing with each state. Individual also has an active Series 65 license and is properly registered in the state of AZ

**Disclosure 2 of 6**

**Reporting Source:** Individual

**Regulatory Action Initiated By:** Ohio Department of Insurance

**Sanction(s) Sought:** Civil and Administrative Penalty(ies)/Fine(s)

**Date Initiated:** 01/18/2017

**Docket/Case Number:** ODI - ID: 626544

**Employing firm when activity occurred which led to the regulatory action:** Brookstone Capital Management

**Product Type:** No Product

**Allegations:** Failure to timely report regulatory Actions

**Current Status:** Final

**Resolution:** Consent

**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?** No

**Resolution Date:** 02/06/2017

**Sanctions Ordered:** Civil and Administrative Penalty(ies)/Fine(s)

**Monetary Sanction 1 of 1**



<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$500.00
<b>Portion Levied against individual:</b>	\$500.00
<b>Payment Plan:</b>	paid by check dated 2/13/17 for 500.00
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	
<b>Was any portion of penalty waived?</b>	No
<b>Amount Waived:</b>	
<b>Broker Statement</b>	This was an administrative action that came out of a 2012 FINRA registration issue that has been explained to each department of insurance. The reason for delay in the state of OH is that the attorney who had the file was on a medical leave for some time and just recently returned. A fax was sent to the OH Department of Insurance on 12/8/2014 disclosing the FINRA event. Even though we showed proof of the fax confirmation, the OH Department of Insurance claims they never received the fax notification/disclosure. The NIPR website was also updated and according to NIPR, that counts as disclosure to each DOI at the time it is added into the system. There were no consumer complaints and no attempts were made to act in bad faith regarding proper disclosure. Anil Vazirani currently has ACTIVE resident insurance license with Arizona and ACTIVE non-resident insurance licenses in all states including the state of OH and is in good standing with each state. Anil Vazirani also has an active Series 65 license in good standing with the state.

### Disclosure 3 of 6

<b>Reporting Source:</b>	Individual
<b>Regulatory Action Initiated By:</b>	NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES
<b>Sanction(s) Sought:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Date Initiated:</b>	01/12/2015
<b>Docket/Case Number:</b>	2015-0112-S
<b>Employing firm when activity occurred which led to the regulatory action:</b>	BROOKSTONE CAPITAL MANAGEMENT
<b>Product Type:</b>	No Product
<b>Allegations:</b>	FAILING TO REPORT WITHIN 30 DAYS A SUSPENSION ON HIS CA NON-RESIDENT LICENSE
<b>Current Status:</b>	Final
<b>Resolution:</b>	STIPULATION AND CONSENT
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No



<b>Resolution Date:</b>	06/11/2015
<b>Sanctions Ordered:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Monetary Sanction 1 of 1</b>	
<b>Monetary Related Sanction:</b>	Monetary Penalty other than Fines
<b>Total Amount:</b>	\$500.00
<b>Portion Levied against individual:</b>	\$500.00
<b>Payment Plan:</b>	
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	06/08/2015
<b>Was any portion of penalty waived?</b>	No
<b>Amount Waived:</b>	
<b>Broker Statement</b>	THE FINRA ACTION WAS A REGISTRATION ISSUE . NO CONSUMER COMPLAINT . I WAS UNDER THE IMPRESSION THAT THE FINRA ACTION HAD TO BE REPORTED TO THE DEPARTMENT OF INSURANCE ON LICENSE RENEWAL . THIS WAS AN HONEST OVERSIGHT. I AM IN GOOD STANDING WITH ALL THE STATES WHERE I HOLD A NON-RESIDENT INSURANCE LIC INCLUDING MY RESIDENT STATE OF AZ .
<b>Disclosure 4 of 6</b>	
<b>Reporting Source:</b>	Individual
<b>Regulatory Action Initiated By:</b>	FLORIDA DEPARTMENT OF FINANCIAL SERVICES
<b>Sanction(s) Sought:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Date Initiated:</b>	01/15/2015
<b>Docket/Case Number:</b>	167547-15-AG
<b>Employing firm when activity occurred which led to the regulatory action:</b>	BROOKSTONE CAPITAL MANAGEMENT
<b>Product Type:</b>	No Product
<b>Allegations:</b>	FAILING TO REPORT WITHIN 30 DAYS OF SUSPENSION ON HIS CA NON-RESIDENT LICENSE
<b>Current Status:</b>	Final
<b>Resolution:</b>	STIPULATION AND CONSENT
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	03/04/2015



<b>Sanctions Ordered:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Monetary Sanction 1 of 1</b>	
<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$1,500.00
<b>Portion Levied against individual:</b>	\$1,500.00
<b>Payment Plan:</b>	
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	03/04/2015
<b>Was any portion of penalty waived?</b>	No
<b>Amount Waived:</b>	
<b>Broker Statement</b>	THE FINRA ACTION WAS A REGISTRATION ISSUE . NO CONSUMER COMPLAINT . I WAS UNDER THE IMPRESSION THAT THE FINRA ACTION HAD TO BE REPORTED TO THE DEPARTMENT OF INSURANCE ON LICENSE RENEWAL . THIS WAS AN HONEST OVERSIGHT. I AM IN GOOD STANDING WITH ALL THE STATES WHERE I HOLD A NON-RESIDENT INSURANCE LIC INCLUDING MY RESIDENT STATE OF AZ .
<b>Disclosure 5 of 6</b>	
<b>Reporting Source:</b>	Individual
<b>Regulatory Action Initiated By:</b>	STATE OF CALIFORNIA INSURANCE COMMISSIONAR
<b>Sanction(s) Sought:</b>	Suspension
<b>Date Initiated:</b>	12/01/2014
<b>Docket/Case Number:</b>	LCB1687-A
<b>Employing firm when activity occurred which led to the regulatory action:</b>	BROOKSTONE CAPITAL MANAGEMENT
<b>Product Type:</b>	No Product
<b>Allegations:</b>	FAILED TO NOTIFY THE COMMISSIONER OF FINRA FINDINGS
<b>Current Status:</b>	Final
<b>Resolution:</b>	DECISION
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	12/07/2014
<b>Sanctions Ordered:</b>	Suspension
<b>Sanction 1 of 1</b>	



<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	BUSINESS OF INSURANCE
<b>Duration:</b>	12/1/2014-12/7/2014
<b>Start Date:</b>	12/01/2014
<b>End Date:</b>	12/07/2014
<b>Broker Statement</b>	THE FINRA ACTION WAS A REGISTRATION ISSUE . NO CONSUMER COMPLAINT . I WAS UNDER THE IMPRESSION THAT THE FINRA ACTION HAD TO BE REPORTED TO THE DEPARTMENT OF INSURANCE ON LICENSE RENEWAL . THIS WAS AN HONEST OVERSIGHT. I AM IN GOOD STANDING WITH ALL THE STATES WHERE I HOLD A NON-RESIDENT INSURANCE LIC INCLUDING MY RESIDENT STATE OF AZ .

**Disclosure 6 of 6**

<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	FINRA
<b>Sanction(s) Sought:</b>	Other: N/A
<b>Date Initiated:</b>	06/19/2014
<b>Docket/Case Number:</b>	<a href="#">2012034936002</a>
<b>Employing firm when activity occurred which led to the regulatory action:</b>	CENTER STREET SECURITIES, INC.
<b>Product Type:</b>	Other: DEBENTURES
<b>Allegations:</b>	WITHOUT ADMITTING OR DENYING THE FINDINGS, VAZIRANI CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT HE SOLICITED SALES OF A COMPANY'S RENEWABLE SECURED DEBENTURES, BUT WAS NOT REGISTERED AS A GENERAL SECURITIES REPRESENTATIVE, OR IN ANY OTHER CAPACITY. THE FINDINGS STATED THAT VAZIRANI SOLICITED SALES OF THE DEBENTURES BY COMMUNICATING WITH PROSPECTIVE CUSTOMERS, DISCUSSING THE DETAILS OF THE DEBENTURES AS AN INVESTMENT, RECOMMENDING THE PURCHASE OF THE DEBENTURES, AND ASSISTING CUSTOMERS WITH COMPLETING THE DOCUMENTS NECESSARY TO PURCHASE THE DEBENTURES. VAZIRANI THEN MAILED CERTAIN OF THE DOCUMENTS TO A REGISTERED REPRESENTATIVE FORMERLY ASSOCIATED WITH HIS MEMBER FIRM, WHO SUBMITTED THE PURCHASES TO THE FIRM AS THE BROKER OF RECORD. THE PAPERWORK DID NOT IDENTIFY VAZIRANI'S ROLE IN THE SALES.
<b>Current Status:</b>	Final
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	06/19/2014



**Sanctions Ordered:** Civil and Administrative Penalty(ies)/Fine(s)  
Suspension

**If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?**

**(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?**

**(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or**



**(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?**

**Sanction 1 of 1**

**Sanction Type:** Suspension

**Capacities Affected:** ALL CAPACITIES

**Duration:** 30 BUSINESS DAYS

**Start Date:** 07/07/2014

**End Date:** 08/15/2014

**Monetary Sanction 1 of 1**

**Monetary Related Sanction:** Civil and Administrative Penalty(ies)/Fine(s)

**Total Amount:** \$5,000.00

**Portion Levied against individual:** \$5,000.00

**Payment Plan:** DEFERRED

**Is Payment Plan Current:**

**Date Paid by individual:**

**Was any portion of penalty waived?** No

**Amount Waived:**

.....

**Reporting Source:** Individual

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:** Civil and Administrative Penalty(ies)/Fine(s)  
Suspension

**Date Initiated:** 06/19/2014

**Docket/Case Number:** [2012034936002](#)



<b>Employing firm when activity occurred which led to the regulatory action:</b>	CENTER STREET SECURITIES, INC.
<b>Product Type:</b>	Debt-Asset Backed
<b>Allegations:</b>	SOLICITED THE SALE OF SECURED DEBENTURES WITHOUT BEING PROPERLY REGISTERED WITH FINRA.
<b>Current Status:</b>	Final
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	06/19/2014
<b>Sanctions Ordered:</b>	Civil and Administrative Penalty(ies)/Fine(s) Suspension
<b>Sanction 1 of 1</b>	
<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	ALL CAPACITIES
<b>Duration:</b>	30 BUSINESS DAYS
<b>Start Date:</b>	07/07/2014
<b>End Date:</b>	
<b>Monetary Sanction 1 of 1</b>	
<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$5,000.00
<b>Portion Levied against individual:</b>	\$5,000.00
<b>Payment Plan:</b>	DEFERRED
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	
<b>Was any portion of penalty waived?</b>	No
<b>Amount Waived:</b>	
<b>Broker Statement</b>	THIS ACTION ONLY INVOLVED A FINRA REGISTRATION ISSUE. IT DID NOT INVOLVE ANY CUSTOMER COMPLAINTS OR DISSATISFACTION BY ANY CONSUMER IN REGARDS TO THE PRODUCT. I HAVE SINCE RESIGNED FROM THE BROKER DEALER AND WILL BE SERVING MY CLIENTS IN A FIDUCIARY CAPACITY AS AN INVESTMENT ADVISOR REPRESENTATIVE.



## **End of Report**

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