



IAPD Report

JEREMY THOMAS RACO

CRD# 2641148

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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

JEREMY THOMAS RACO (CRD# 2641148)

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 **01/02/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	NOVEM GROUP	CRD# 158964	04/20/2015
B	OSAIC WEALTH, INC.	CRD# 23131	10/11/2024

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **11** 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	AMERICAN PORTFOLIOS FINANCIAL SERVICES, INC.	18487	ROCHESTER, NY	02/04/2013 - 10/11/2024
B	HORNOR, TOWNSEND & KENT, INC.	4031	ROCHESTER, NY	01/17/2008 - 02/15/2013
IA	HORNOR, TOWNSEND & KENT, INC.	4031	ROCHESTER, NY	01/17/2008 - 02/15/2013

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
Criminal	1
Customer Dispute	3



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

Employment 1 of 2

Firm Name: **OSAIC WEALTH, INC.**
Main Address: 18700 N. HAYDEN ROAD
SUITE 255
SCOTTSDALE, AZ 85255
Firm ID#: 23131

Regulator	Registration	Status	Date
 FINRA	Invest. Co and Variable Contracts	Approved	10/11/2024
 Arizona	Agent	Approved	10/11/2024
 Florida	Agent	Approved	10/11/2024
 Georgia	Agent	Approved	10/11/2024
 Maryland	Agent	Approved	10/11/2024
 New Jersey	Agent	Approved	10/11/2024
 New York	Agent	Approved	10/11/2024
 North Carolina	Agent	Approved	10/11/2024
 Ohio	Agent	Approved	10/11/2024
 South Carolina	Agent	Approved	10/11/2024
 Virginia	Agent	Approved	10/11/2024
 Wisconsin	Agent	Approved	10/11/2024

Branch Office Locations



Qualifications

OSAIC WEALTH, INC.
350 LINDEN OAKS
SUITE 140
ROCHESTER, NY 14625

Employment 2 of 2

Firm Name: **NOVEM GROUP**
Main Address: 350 LINDEN OAKS
SUITE 140
ROCHESTER, NY 14625
Firm ID#: 158964

Regulator	Registration	Status	Date
IA Arizona	Investment Adviser Representative	Approved	10/25/2022
IA Florida	Investment Adviser Representative	Approved	09/19/2023
IA Maryland	Investment Adviser Representative	Approved	08/03/2022
IA New York	Investment Adviser Representative	Approved	10/22/2021
IA North Carolina	Investment Adviser Representative	Approved	10/25/2022
IA South Carolina	Investment Adviser Representative	Approved	10/26/2020
IA Virginia	Investment Adviser Representative	Approved	01/06/2021

Branch Office Locations

NOVEM GROUP
350 LINDEN OAKS
SUITE 140
ROCHESTER, NY 14625



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

Principal/Supervisory Exams

Exam	Category	Date
No information reported.		

General Industry/Product Exams

Exam	Category	Date
B Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
B Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	02/13/1996

State Securities Law Exams

Exam	Category	Date
IA Uniform Investment Adviser Law Examination (S65)	Series 65	10/26/2006
B Uniform Securities Agent State Law Examination (S63)	Series 63	09/05/1996

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	02/04/2013 - 10/11/2024	AMERICAN PORTFOLIOS FINANCIAL SERVICES, INC.	CRD# 18487	ROCHESTER, NY
B	01/17/2008 - 02/15/2013	HORNOR, TOWNSEND & KENT, INC.	CRD# 4031	ROCHESTER, NY
IA	01/17/2008 - 02/15/2013	HORNOR, TOWNSEND & KENT, INC.	CRD# 4031	ROCHESTER, NY
IA	12/11/2006 - 01/24/2008	1717 CAPITAL MANAGEMENT COMPANY	CRD# 4082	ROCHESTER, NY
B	12/17/2002 - 01/24/2008	1717 CAPITAL MANAGEMENT COMPANY	CRD# 4082	ROCHESTER, NY
B	04/22/1996 - 12/20/2002	SIGNATOR INVESTORS, INC.	CRD# 468	BOSTON, MA

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
10/2024 - Present	OSAIC WEALTH, INC.	Mass Transfer	Y	ROCHESTER, NY, United States
02/2013 - Present	NOVEM GROUP, INC.	INVESTMENT ADVISER REPRESENTATIVE	Y	ROCHESTER, NY, United States
02/2013 - 10/2024	AMERICAN PORTFOLIOS FINANCIAL SERVICES, INC.	REGISTERED REPRESENTATIVE	Y	HOLBROOK, NY, 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) APFS ROCHESTER. INSURANCE SALES, NOT INVESTMENT-RELATED, START DATE 2/2013, 10 HOURS DEVOTED PER MONTH DURING MARKET HOURS
- 2) NOVEM GROUP, INVESTMENT-RELATED, INVESTMENT ADVISER REPRESENTATIVE, INVESTMENT-RELATED, START DATE 2/2013, 80 HOURS DEVOTED PER MONTH DURING MARKET HOURS
- 3) OSAIC WEALTH, INC., INVESTMENT-RELATED, REGISTERED REPRESENTATIVE, START DATE 10/2024, 80 HOURS DEVOTED PER MONTH DURING MARKET HOURS
- 4) LIFE INSURANCE SALES



Registration & Employment History

OTHER BUSINESS ACTIVITIES

POSITION: agent NATURE: Life Insurance sales INVESTMENT RELATED: No NUMBER OF HOURS: 5 SECURITIES TRADING HOURS: 3 START DATE: 01/01/2025

ADDRESS: 350 linden Oaks, Rochester NY 14625, United States

DESCRIPTION: Offer Life insurance solutions to people who request it

5) NOVEM GROUP CORP

POSITION: agent NATURE: Corporation INVESTMENT RELATED: Yes NUMBER OF HOURS: 150 SECURITIES TRADING HOURS: 150 START DATE: 01/01/2017

ADDRESS: 350 linden Oaks, Rochester NY 14625, United States

DESCRIPTION: Passive Shareholder

Investment IAR



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
Criminal	1
Customer Dispute	3

Criminal

This disclosure event involves a criminal charge against the Investment Adviser Representative that has resulted in a dismissal, plea, acquittal or conviction. The criminal matter may relate to any felony or certain misdemeanor offenses (e.g., bribery, perjury, forgery, counterfeiting, extortion, fraud, wrongful taking of property).

Disclosure 1 of 1

Reporting Source:	Individual
Court Details:	COUNTY COURT/ONTARIO,NY PCN 952024207003
Charge Date:	07/26/1994
Charge Details:	RETURNED CHECK \$100.00
Felony?	No
Current Status:	Final
Status Date:	07/28/1994
Disposition Details:	COMPLETELY DISMISSED-NO PENALTY
Broker Statement	NOT PROVIDED



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 3

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	1717 CAPITAL MANAGEMENT
Allegations:	CUSTOMER ALLEGES MISREPRESENTATION IN THE SALE OF VARIABLE LIFE POLICY AND VARIABLE ANNUITY IN 2005.
Product Type:	Annuity-Variable Other: VARIABLE LIFE
Alleged Damages:	\$0.00
Alleged Damages Amount Explanation (if amount not exact):	SPECIFIC AMOUNT NOT ALLEGED BUT GOOD FAITH DETERMINATION TO EXCEED \$5,000.00
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:	04/18/2012
Complaint Pending?	No
Status:	Denied
Status Date:	08/07/2012
Settlement Amount:	

Individual Contribution Amount:

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	1717 CAPITAL MANAGEMENT
Allegations:	BASED ON THE FORM U5 AMENDMENT FILED BY THE REPRESENTATIVE'S PREDECESSOR BROKER DEALER " THE CUSTOMER ALLEGES MISREPRESENTATION IN THE SALE OF VARIABLE LIFE POLICY AND VARIABLE ANNUITY IN 2005".
Product Type:	Annuity-Variable Other: VARIABLE LIFE
Alleged Damages:	\$0.00



Alleged Damages Amount SPECIFIC AMOUNT NOT ALLEGED BUT GOOD FAITH DETERMINATION TO EXCEED \$5,000.00.
Explanation (if amount not exact):

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: 04/18/2012

Complaint Pending? No

Status: Denied

Status Date: 08/07/2012

Settlement Amount:

Individual Contribution Amount:

Disclosure 2 of 3

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: 1717 CAPITAL MANAGEMENT COMPANY

Allegations: CUSTOMER ALLEGES VARIABLE LIFE INSURANCE POLICY SOLD TO HER IN 2003 WAS NOT SUITABLE. DAMAGES NOT SPECIFIED.

Product Type: Insurance

Alleged Damages: \$0.00

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: 11/11/2011

Complaint Pending? No

Status: Denied

Status Date: 12/29/2011

Settlement Amount: \$0.00

Individual Contribution Amount: \$0.00

Reporting Source: Individual



Employing firm when activities occurred which led to the complaint:

1717 CAPITAL MANAGEMENT COMPANY

Allegations:

BASED ON THE FORM U5 AMENDMENT FILED BY THE REPRESENTATIVE'S PREDECESSOR BROKER DEALER "CUSTOMER ALLEGES VARIABLE LIFE INSURANCE POLICY SOLD TO HER IN 2003 WAS NOT SUITABLE. DAMAGES NOT SPECIFIED".

Product Type: Insurance

Alleged Damages: \$0.00

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: 11/11/2011

Complaint Pending? No

Status: Denied

Status Date: 12/29/2011

Settlement Amount:

Individual Contribution Amount:

Disclosure 3 of 3

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: 1717 CAPITAL MANAGEMENT

Allegations: CUSTOMER ALLEGES MISREPRESENTATION IN THE SALE OF A VARIABLE ANNUITY IN 2006, DAMAGES UNSPECIFIED.

Product Type: Other

Other Product Type(s): VARIABLE ANNUITY

Alleged Damages: \$0.00

Customer Complaint Information

Date Complaint Received: 05/07/2007

Complaint Pending? No

Status: Closed/No Action

Status Date: 07/13/2007

Settlement Amount:

Individual Contribution Amount:



End of Report

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