



## IAPD Report

# PATRICK DENNIS COMBS

CRD# 2720909

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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

### PATRICK DENNIS COMBS (CRD# 2720909)

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 **03/12/2026**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	COMBS CAPITAL PARTNERS	CRD# 310547	09/17/2020

### 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	ARCHETYPE WEALTH PARTNERS, LLC	287466	SOUTHLAKE, TX	08/18/2017 - 09/30/2020
IA	SOLUTIONS 4 WEALTH	143248	SOUTHLAKE, TX	04/27/2016 - 09/08/2017
IA	IMS FINANCIAL ADVISORS, INC.	130914	SOUTHLAKE, TX	04/04/2016 - 04/26/2016

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
Regulatory Event	1
Customer Dispute	1
Termination	1



## 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: **COMBS CAPITAL PARTNERS**  
Main Address: SOUTHLAKE, TX  
Firm ID#: 310547

Regulator	Registration	Status	Date
<b>IA</b> Louisiana	Investment Adviser Representative	Approved	01/23/2023
<b>IA</b> Texas	Investment Adviser Representative	Approved	09/17/2020

### Branch Office Locations

**COMBS CAPITAL PARTNERS**  
SOUTHLAKE, TX



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




#### Principal/Supervisory Exams

Exam	Category	Date
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No information reported.



#### General Industry/Product Exams

Exam	Category	Date
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 Securities Industry Essentials Examination (SIE)	SIE	04/26/2016
 Futures Managed Funds Examination (S31)	Series 31	07/01/2005
 General Securities Representative Examination (S7)	Series 7	06/03/2005

#### State Securities Law Exams

Exam	Category	Date
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 Uniform Investment Adviser Law Examination (S65)	Series 65	06/27/2005
 Uniform Securities Agent State Law Examination (S63)	Series 63	06/16/2005

### 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	08/18/2017 - 09/30/2020	ARCHETYPE WEALTH PARTNERS, LLC	CRD# 287466	SOUTHLAKE, TX
IA	04/27/2016 - 09/08/2017	SOLUTIONS 4 WEALTH	CRD# 143248	SOUTHLAKE, TX
IA	04/04/2016 - 04/26/2016	IMS FINANCIAL ADVISORS, INC.	CRD# 130914	SOUTHLAKE, TX
B	03/14/2016 - 04/26/2016	IMS SECURITIES, INC.	CRD# 35567	HOUSTON, TX
B	06/01/2009 - 03/28/2016	MORGAN STANLEY	CRD# 149777	SOUTHLAKE, TX
IA	06/01/2009 - 03/28/2016	MORGAN STANLEY	CRD# 149777	SOUTHLAKE, TX
IA	03/14/2016 - 03/22/2016	IMS FINANCIAL ADVISORS, INC.	CRD# 130914	SOUTHLAKE, TX
B	04/02/2007 - 06/01/2009	MORGAN STANLEY & CO. INCORPORATED	CRD# 8209	ARLINGTON, TX
IA	04/02/2007 - 06/01/2009	MORGAN STANLEY & CO. INCORPORATED	CRD# 8209	ARLINGTON, TX
IA	06/29/2005 - 04/02/2007	MORGAN STANLEY	CRD# 7556	HOUSTON, TX
B	06/06/2005 - 04/02/2007	MORGAN STANLEY DW INC.	CRD# 7556	HOUSTON, TX

### 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
01/2026 - Present	Pathway Healthcare	Interim CEO	N	Birmingham, AL, United States
01/2021 - Present	COMBS CAPITAL GROUP, LLC	PARTNER	Y	SOUTHLAKE, TX, United States
08/2020 - Present	Combs Capital Partners LLC	Investment Adviser Representative	Y	Southlake, TX, United States
06/2016 - 02/2026	Teamalytics	Senior VP of Consulting	N	College Station, TX, United States



## Registration & Employment History

### EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
06/2017 - 08/2020	ARCHETYPE WEALTH PARTNERS, LLC	INVESTMENT ADVISER REPRESENTATIVE	Y	SOUTHLAKE, TX, United States
04/2016 - 06/2017	SOLUTIONS 4 WEALTH, LTD.	FINANCIAL ADVISOR	Y	SOUTHLAKE, TX, 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) Partners; Combs Capital Group, LLC; Investment Related: Yes; Location: 203 Timber Lake Way, Southlake, TX, 76092; Description of the business: General Partner in Alternative Investment Vehicles; Responsibilities Duties: Vetting alternative investment opportunities; Start date with business: 2021-01-01; Hours devoted to business during trading hours: 2; Hours devoted to business outside trading hours: 8.
- 2) VAUCLUSE CAPITAL; MANAGING DIRECTOR; INVESTMENT RELATED: YES; 3838 OAKLAWN AVE., SUITE 1450 DALLAS TX 75219 USA; VAUCLUSE CAPITAL IS A HEDGE FUND WITH A FOCUS ON BLOCKCHAIN RELATED INVESTMENTS.; HIS ROLE IS TO OVERSEE THE RAISING AND MANAGEMENT OF FUNDS.; 2022-01-01; HOURS PER MONTH DEVOTED TO BUSINESS DURING TRADING HOURS: 10; HOURS PER MONTH DEVOTED TO BUSINESS OUTSIDE TRADING HOURS: 40.
- 3) Karpos Capital Partners; Investment related: Yes; 539 W. Commerce St #1793 Dallas TX 75208; Karpos Capital Partners is a private equity investment company focused on buying and growing high-potential, well managed small to mid-sized companies.; Managing Director; Pat's primary responsibilities revolve around administrative and operational assistance with the various portfolio companies.; Start date: 2023-01-18; Hours per month during trading hours: 3; Hours per month outside trading hours: 3.
- 4) Pathway Healthcare; Investment related: No; 48 Medical Park East, Suite 453 Birmingham AL 35235 USA; Pathway is an outpatient behavioral and mental health services provider designed to meet the needs of those dealing with depression, anxiety, trauma, addiction, or a mix of things.; Interim CEO; 2026-01-19; Hours per month during trading hours: 60; Hours per month outside trading hours: 20.



## 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	1
Customer Dispute	1
Termination	1

### 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 1

<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	FINRA
<b>Sanction(s) Sought:</b>	Other: N/A
<b>Date Initiated:</b>	03/01/2017
<b>Docket/Case Number:</b>	<a href="#">2016048688001</a>
<b>Employing firm when activity occurred which led to the regulatory action:</b>	Morgan Stanley
<b>Product Type:</b>	Other: private securities
<b>Allegations:</b>	Without admitting or denying the findings, Combs consented to the sanctions and to the entry of findings that he participated in a private securities transaction without providing prior written notice to his member firm. The findings stated that Combs arranged and participated in an in-person meeting between a firm customer, who was a professional athlete, and a professional acquaintance who was performing consulting work for a privately-held sports-drink company. The customer eventually invested \$500,000 in the company and received a convertible promissory note. The customer also received a warrant entitling him to purchase equity at a reduced cost. Shortly thereafter, the customer also entered into a spokesperson agreement with the company. The findings also stated that Combs submitted false answers concerning the private securities transaction in annual compliance questionnaires.
<b>Current Status:</b>	Final



**Resolution:** Acceptance, Waiver & Consent(AWC)

**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:** 03/01/2017

**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?** No

**(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:** seven months  
**Start Date:** 03/06/2017  
**End Date:** 10/05/2017

**Monetary Sanction 1 of 1**

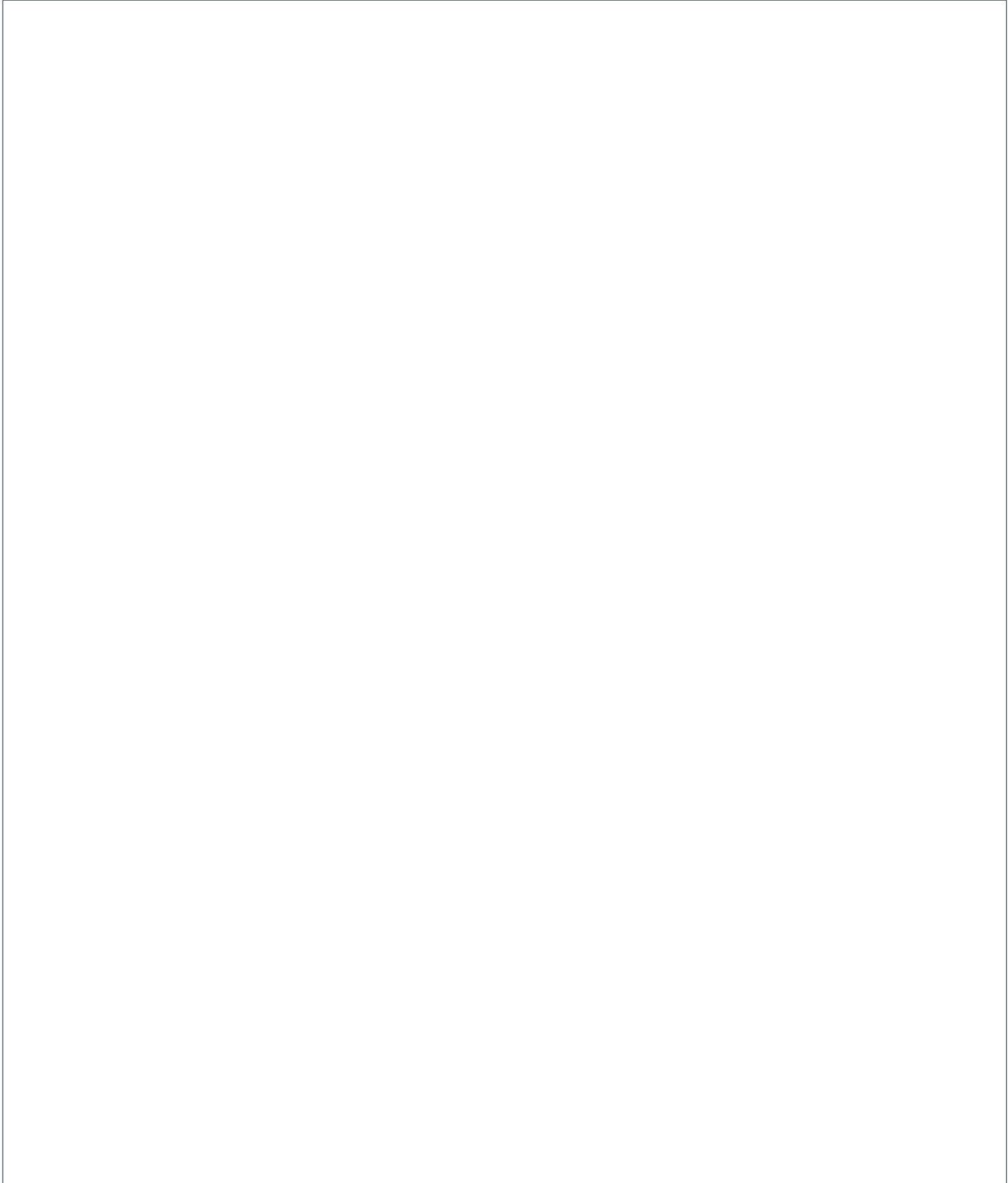
**Monetary Related Sanction:** Civil and Administrative Penalty(ies)/Fine(s)  
**Total Amount:** \$7,500.00  
**Portion Levied against individual:** \$7,500.00  
**Payment Plan:** deferred  
**Is Payment Plan Current:**  
**Date Paid by individual:**  
**Was any portion of penalty waived?** No

**Amount Waived:**

.....  
**Reporting Source:** Individual  
**Regulatory Action Initiated By:** FINRA  
**Sanction(s) Sought:** Civil and Administrative Penalty(ies)/Fine(s)  
Suspension  
**Date Initiated:** 03/01/2017  
**Docket/Case Number:** [2016048688001](#)



<b>Employing firm when activity occurred which led to the regulatory action:</b>	MORGAN STANLEY
<b>Product Type:</b>	Other: Private securities
<b>Allegations:</b>	Without admitting or denying the findings, Combs consented to the sanctions and to the entry of findings that he participated in a private securities transaction without providing prior written notice to his member firm. The findings stated that Combs arranged and participated in an in-person meeting between a firm customer, who was a professional athlete, and a professional acquaintance who was performing consulting work for a privately-held sports-drink company. The customer eventually invested \$500,000 in the company and received a convertible promissory note. The customer also received a warrant entitling him to purchase equity at a reduced cost. Shortly thereafter, the customer also entered into a spokesperson agreement with the company. The findings also stated that Combs submitted false answers concerning the private securities transaction in annual compliance questionnaires.
<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>	03/01/2017
<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>	Seven months
<b>Start Date:</b>	03/06/2017
<b>End Date:</b>	10/05/2017
<b>Monetary Sanction 1 of 1</b>	
<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$7,500.00
<b>Portion Levied against individual:</b>	\$7,500.00
<b>Payment Plan:</b>	
<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>	





## 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 1

<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	MORGAN STANLEY
<b>Allegations:</b>	Claimant alleges, inter alia, that in 2012 the FA misrepresented a non-broker affiliated investment.
<b>Product Type:</b>	No Product
<b>Alleged Damages:</b>	\$0.00
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	Yes
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	No

## Customer Complaint Information

<b>Date Complaint Received:</b>	09/14/2015
<b>Complaint Pending?</b>	Yes
<b>Settlement Amount:</b>	

**Individual Contribution Amount:**

## Civil Litigation Information

<b>Type of Court:</b>	State Court
<b>Name of Court:</b>	District Court
<b>Location of Court:</b>	Tarrant County, Texas
<b>Docket/Case #:</b>	048-283087-16
<b>Date Notice/Process Served:</b>	01/07/2016
<b>Litigation Pending?</b>	Yes



## Termination

This disclosure event involves a situation where the Investment Adviser Representative voluntarily resigned, was discharged or was permitted to resign after allegations were made that accused the Investment Adviser Representative of violating investment-related statutes, regulations, rules or industry standards of conduct; fraud or the wrongful taking of property; or failure to supervise in connection with investment-related statutes, regulations, rules or industry standards of conduct.

### Disclosure 1 of 1

**Reporting Source:** Firm  
**Firm Name:** Morgan Stanley Smith Barney, LLC  
**Termination Type:** Discharged  
**Termination Date:** 02/29/2016  
**Allegations:** Allegations regarding employee's conduct regarding the use of personal email to facilitate a private investment for a firm client.  
**Product Type:** Other: Private Investment

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**Reporting Source:** Individual  
**Firm Name:** Morgan Stanley  
**Termination Type:** Discharged  
**Termination Date:** 03/30/2016  
**Allegations:** conduct regarding the registered representative's use of personal email to facilitate a private investment for a firm client  
**Product Type:** Other: private investment  
**Broker Statement** representative introduced a client to an acquaintance. Representative received no compensation.



## End of Report

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