



IAPD Report

STEPHEN DANIEL POLIN

CRD# 2860574

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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

STEPHEN DANIEL POLIN (CRD# 2860574)

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
B	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	06/18/2007
IA	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	07/17/2007

QUALIFICATIONS

This representative is currently registered in **6** SRO(s) and **39** 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	CITIGROUP GLOBAL MARKETS INC.	7059	MANALAPAN, FL	03/12/2001 - 07/06/2007
IA	CITIGROUP GLOBAL MARKETS INC.	7059	MANALAPAN, FL	03/12/2001 - 07/06/2007
B	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	7691	NEW YORK, NY	04/10/1997 - 03/16/2001

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	4



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 **39** jurisdiction(s) and 6 SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED**
Main Address: ONE BRYANT PARK
NEW YORK, NY 10036
Firm ID#: 7691

Regulator	Registration	Status	Date
B Cboe BYX Exchange, Inc.	General Securities Representative	Approved	05/07/2014
B Cboe BZX Exchange, Inc.	General Securities Representative	Approved	05/07/2014
B Cboe Exchange, Inc.	General Securities Representative	Approved	06/18/2007
B FINRA	General Securities Representative	Approved	06/18/2007
B Nasdaq Stock Market	General Securities Representative	Approved	06/18/2007
B New York Stock Exchange	General Securities Representative	Approved	06/18/2007
B Alabama	Agent	Approved	09/17/2019
B Arizona	Agent	Approved	09/20/2019
B California	Agent	Approved	06/18/2007
B Colorado	Agent	Approved	07/15/2019
B Connecticut	Agent	Approved	06/18/2007
B Delaware	Agent	Approved	04/16/2015
B District of Columbia	Agent	Approved	03/02/2010



Qualifications

Regulator	Registration	Status	Date
B Florida	Agent	Approved	06/18/2007
IA Florida	Investment Adviser Representative	Approved	07/17/2007
B Georgia	Agent	Approved	06/18/2007
B Idaho	Agent	Approved	09/19/2025
B Indiana	Agent	Approved	09/23/2019
B Iowa	Agent	Approved	09/17/2025
B Maine	Agent	Approved	03/04/2010
B Maryland	Agent	Approved	06/18/2007
B Massachusetts	Agent	Approved	06/18/2007
B Michigan	Agent	Approved	11/14/2008
B Minnesota	Agent	Approved	06/18/2007
B Mississippi	Agent	Approved	06/18/2007
B Montana	Agent	Approved	08/04/2016
B Nevada	Agent	Approved	12/17/2018
B New Hampshire	Agent	Approved	03/01/2010
B New Jersey	Agent	Approved	06/18/2007
B New Mexico	Agent	Approved	03/05/2013
B New York	Agent	Approved	06/18/2007
B North Carolina	Agent	Approved	06/18/2007



Qualifications

Regulator	Registration	Status	Date
B Ohio	Agent	Approved	11/01/2007
B Oklahoma	Agent	Approved	09/18/2019
B Oregon	Agent	Approved	06/18/2007
B Pennsylvania	Agent	Approved	06/18/2007
B Rhode Island	Agent	Approved	05/05/2009
B South Carolina	Agent	Approved	06/18/2007
B Tennessee	Agent	Approved	09/22/2025
B Texas	Agent	Approved	06/18/2007
IA Texas	Investment Adviser Representative	Restricted Approval	10/17/2012
IA Utah	Investment Adviser Representative	Approved	01/05/2026
B Utah	Agent	Approved	01/06/2026
B Vermont	Agent	Approved	02/24/2010
B Virginia	Agent	Approved	06/18/2007
B Washington	Agent	Approved	04/26/2019
B Wisconsin	Agent	Approved	09/17/2025
B Wyoming	Agent	Approved	10/24/2019

Branch Office Locations

**MERRILL LYNCH, PIERCE, FENNER & SMITH
INCORPORATED**
249 ROYAL PALM WAY
PALM BEACH, FL 33480



Qualifications



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
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No information reported.

General Industry/Product Exams


Exam	Category	Date
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 Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
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 General Securities Representative Examination (S7)	Series 7	04/09/1997
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State Securities Law Exams

Exam	Category	Date
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 Uniform Investment Adviser Law Examination (S65)	Series 65	06/30/1997
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 Uniform Securities Agent State Law Examination (S63)	Series 63	05/05/1997
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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	03/12/2001 - 07/06/2007	CITIGROUP GLOBAL MARKETS INC.	CRD# 7059	MANALAPAN, FL
IA	03/12/2001 - 07/06/2007	CITIGROUP GLOBAL MARKETS INC.	CRD# 7059	MANALAPAN, FL
B	04/10/1997 - 03/16/2001	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	NEW YORK, NY

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
12/2009 - Present	BANK OF AMERICA, NA	FINANCIAL ADVISOR	Y	WEST PALM BEACH,, FL, United States
06/2007 - Present	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	FINANCIAL ADVISOR	Y	WEST PALM BEACH, FL, 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.

I*53454
 For profit or not for profit: For-Profit Organization
 Name of outside business organization: Overpower Records LLC
 Investment related: N
 Address of business:
 Wellington, Florida 33414
 Nature of business: LLC,
 Position, title, association: Owner,
 Start date of relationship: 1/3/2011
 Number of hours devoted: 10 hour(s) Monthly
 Number of hours devoted during trading hours: 1
 Duties: The purpose of the entity was to release my personal music and register with ASCAP to help protect my music. You can not do this with out releasing on a record label. So I simply created my own for purpose of facilitating my releases.



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	4

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:	MANATEE COUNTY SHERIFF'S OFFICE 90-229F
Charge Date:	01/21/1990
Charge Details:	OBSTRUCTING A FIREFIGHTER
Felony?	Yes
Current Status:	Final
Status Date:	02/28/1991
Disposition Details:	THE CASE WAS NOLLE PROSEQUI BY THE STATE'S ATTORNEY.
Broker Statement	THREE FRIENDS AND MYSELF WERE A PARTY AT AN APARTMENT COMPLEX. WE REMOVED THE FIRE EXTINGUISHER FROM THE WALL AND SPRAYED IT IN THE PARKING LOT. SOME OF THE RESIDUE SETTLED ON A RENTERS CAR. THE OWNER WAS UPSET AND CALLED THE POLICE.



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 4

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED

Allegations: THE CUSTOMER ALLEGES FAILURE TO FOLLOW INSTRUCTIONS FROM APRIL 2013 TO AUGUST 2013.

Product Type: Mutual Fund

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): DAMAGES ARE NOT SPECIFIED.

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: 08/21/2013

Complaint Pending? No

Status: Denied

Status Date: 10/17/2013

Settlement Amount:

Individual Contribution Amount:

Disclosure 2 of 4

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED

Allegations: THE CUSTOMER ALLEGES UNSUITABLE INVESTMENT RECOMMENDATIONS.

Product Type: Equity Listed (Common & Preferred Stock)

Alleged Damages: \$553,732.00

Is this an oral complaint? No



Is this a written complaint? No
**Is this an arbitration/CFTC
reparation or civil litigation?** Yes
**Arbitration/Reparation forum
or court name and location:** FINRA
Docket/Case #: 09-05733
**Filing date of
arbitration/CFTC reparation
or civil litigation:** 09/23/2009

Customer Complaint Information

Date Complaint Received: 10/20/2009
Complaint Pending? No
Status: Settled
Status Date: 09/01/2010
Settlement Amount: \$75,000.00
**Individual Contribution
Amount:** \$0.00

Broker Statement

THE CLIENT HAD AN ACCOUNT WITH STEPHEN POLIN OF MERRILL LYNCH FOR LITTLE MORE THAN A YEAR. SHE THEN TRANSFERRED HER ACCOUNT TO A DIFFERENT FINANCIAL ADVISOR AT BANC OF AMERICA INVESTMENT SERVICES, INC. BANK OF AMERICA SUBSEQUENTLY ACQUIRED MERRILL LYNCH AND BAI WAS MERGED WITH AND INTO MERRILL LYNCH. THE CLIENT DID NOT NAME POLIN AS A RESPONDENT IN HER STATEMENT OF CLAIM. THE CLIENT DID NOT FILE HER CLAIM UNTIL OVER A YEAR AFTER SHE LEFT POLIN AND MERRILL LYNCH. A MATERIAL PORTION OF HER PORTFOLIO WAS NOT PURCHASED THROUGH POLIN AND 80% OF THE LOSSES OCCURRED AFTER SHE TRANSFERRED AWAY FROM POLIN AND TO A NEW FINANCIAL ADVISOR. POLIN DENIES ALL ACCUSATIONS BY THE FORMER CLIENT AND BELIEVES THAT HE MADE HIS RECOMMENDATIONS BASED UPON THE CLIENT'S REQUESTS, INVESTMENT OBJECTIVES AND OVERALL SUITABILITY.

Disclosure 3 of 4

Reporting Source: Individual
**Employing firm when
activities occurred which led
to the complaint:** MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED
Allegations: THE CUSTOMER ALLEGES UNSUITABLE INVESTMENT RECOMMENDATIONS.
Product Type: Equity Listed (Common & Preferred Stock)
Alleged Damages: \$118,737.00
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: 03/27/2009

Complaint Pending? No

Status: Denied

Status Date: 05/27/2009

Settlement Amount:

Individual Contribution Amount:

Broker Statement

MERRILL LYNCH AND MR. POLIN DENY THE CUSTOMER'S ALLEGATIONS. THE CUSTOMER'S ACCOUNT WAS HANDLED APPROPRIATELY AND PROFESSIONALLY AND IN ACCORDANCE WITH THE CUSTOMER'S INSTRUCTIONS AT ALL TIMES. THE LOSSES THE CUSTOMER INCURRED WERE NOT BECAUSE MR. POLIN OR MERRILL LYNCH FAILED TO FOLLOW THE CUSTOMER'S INSTRUCTIONS BUT DUE TO MARKET ACTION. CUSTOMER NEVER RAISED ANY PRIOR CONCERNS WITH THE POSITIONS AT ISSUE OR THE FACT THAT THEY WERE NOT CONSISTENT WITH HER GOALS. CUSTOMER CHOSE TO SELL HER POSITIONS IN DISREGARD OF THE ADVICE OF MR. POLIN.

Disclosure 4 of 4

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: MERRILL LYNCH, PIERCE, FENNER & SMITH INC.

Allegations: CUSTOMERS ALLEGE THE MANNER IN WHICH THEIR ACCOUNTS WOULD BE INVESTED WAS MISREPRESENTED TO THEM AND INVESTMENTS THEMSELVES WERE UNSUITABLE FOR THEIR LONG TERM OBJECTIVES. CUSTOMERS SEEKS RECISSION.

Product Type: Mutual Fund(s)

Other Product Type(s): STOCKS-LISTED

Alleged Damages: \$0.00

Customer Complaint Information

Date Complaint Received: 03/20/2001

Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:

Firm Statement THE ALLEGATIONS ARE DENIED.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: MERRILL LYNCH

Allegations: CUSTOMERS ALLEGE THE MANNER IN WHICH THEIR ACCOUNTS WOULD



BE INVESTED WAS MISREPRESENTED TO THEM AND INVESTMENTS THEMSELVES WERE UNSUITABLE FOR THEIR LONG TERM OBJECTIVES. CUSTOMERS SEEKS RECISSION.

Product Type: Mutual Fund
Other: STOCKS - LISTED

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: 03/20/2001

Complaint Pending? No

Status: Denied

Status Date: 08/01/2001

Settlement Amount:

**Individual Contribution
Amount:**



End of Report

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