IAPD Report

Richard Scott DeBono

CRD# 2882335

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

Richard Scott DeBono (CRD# 2882335)

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 **01/07/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	VANDERBILT SECURITIES, LLC	CRD# 5953	07/15/2024
IA	VANDERBILT ADVISORY SERVICES	CRD# 116537	07/15/2024

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **9** 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	STIRLINGSHIRE INVESTMENTS	327779	Granite Bay, CA	03/14/2024 - 07/03/2024
B	STIRLINGSHIRE INVESTMENTS	310576	NEW YORK CITY, NY	03/13/2024 - 07/03/2024
B	NEXT FINANCIAL GROUP, INC.	46214	Roseville, CA	11/01/2019 - 03/26/2024

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
Termination	1
Judgment/Lien	2

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

Employment 1 of 2

Firm Name: **VANDERBILT SECURITIES, LLC**

Main Address: 125 FROEHLICH FARM BLVD.
WOODBURY, NY 11797

Firm ID#: 5953

	Regulator	Registration	Status	Date
B	FINRA	General Securities Representative	Approved	07/15/2024
B	Arizona	Agent	Approved	07/29/2024
B	California	Agent	Approved	07/15/2024
B	Florida	Agent	Approved	07/15/2024
B	Indiana	Agent	Approved	07/15/2024
B	New York	Agent	Approved	09/12/2024
B	North Carolina	Agent	Approved	07/15/2024
B	Oregon	Agent	Approved	08/08/2024
B	Texas	Agent	Approved	07/15/2024
B	Utah	Agent	Approved	12/11/2025

Branch Office Locations

Folsom, CA

Employment 2 of 2

Firm Name: **VANDERBILT ADVISORY SERVICES**

Qualifications

Main Address: 125 FROEHLICH FARM BLVD.
WOODBURY, NY 11797

Firm ID#: 116537

	Regulator	Registration	Status	Date
IA	California	Investment Adviser Representative	Approved	07/26/2024
IA	Texas	Investment Adviser Representative	Restricted Approval	07/15/2024

Branch Office Locations

VANDERBILT ADVISORY SERVICES
Folsom, CA

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
	No information reported.		

General Industry/Product Exams

	Exam	Category	Date
B	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
B	General Securities Representative Examination (S7)	Series 7	06/18/1998
B	National Commodity Futures Examination (S3)	Series 3	04/17/1997

State Securities Law Exams

	Exam	Category	Date
IA	Uniform Investment Adviser Law Examination (S65)	Series 65	07/15/1998
B	Uniform Securities Agent State Law Examination (S63)	Series 63	06/29/1998

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	03/14/2024 - 07/03/2024	STIRLINGSHIRE INVESTMENTS	CRD# 327779	Granite Bay, CA
B	03/13/2024 - 07/03/2024	STIRLINGSHIRE INVESTMENTS	CRD# 310576	NEW YORK CITY, NY
B	11/01/2019 - 03/26/2024	NEXT FINANCIAL GROUP, INC.	CRD# 46214	Roseville, CA
IA	11/01/2019 - 03/26/2024	NEXT FINANCIAL GROUP, INC.	CRD# 46214	Roseville, CA
IA	04/03/2017 - 11/26/2019	AMERITAS INVESTMENT CORP	CRD# 14869	Roseville, CA
B	03/31/2017 - 11/26/2019	AMERITAS INVESTMENT CORP.	CRD# 14869	Roseville, CA
IA	07/14/2004 - 04/10/2017	BROWN ROBELLO CAPITAL MANAGEMENT, LLC	CRD# 113791	SACRAMENTO, CA
B	06/18/2004 - 03/31/2017	AVISEN SECURITIES, INC.	CRD# 125977	SACRAMENTO, CA
IA	07/14/2004 - 12/31/2004	BROWN ROBELLO CAPITAL MANAGEMENT, LLC	CRD# 113791	SACRAMENTO, CA
B	07/01/2003 - 07/01/2004	WACHOVIA SECURITIES, LLC	CRD# 19616	ST. LOUIS, MO
IA	07/01/2003 - 07/01/2004	WACHOVIA SECURITIES, LLC	CRD# 19616	ROSEVILLE, CA
IA	08/25/1998 - 07/01/2003	PRUDENTIAL SECURITIES INCORPORATED	CRD# 7471	ROSEVILLE, CA
B	07/13/1998 - 07/01/2003	PRUDENTIAL SECURITIES INCORPORATED	CRD# 7471	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
07/2024 - Present	Vanderbilt Financial Group	Registered Representative / IAR	Y	Woodbury, NY, United States

Registration & Employment History

EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
03/2024 - 07/2024	Stirlingshire Investments	Registered Representative and IAR	Y	NYC, NY, United States
11/2019 - 03/2024	NEXT Financial Group, Inc.	Registered Representative	Y	Houston, TX, United States
03/2017 - 11/2019	Ameritas Investment Corp	Registered Representative/IAR	Y	Lincoln, NE, United States
03/2017 - 11/2019	Ameritas Life Insurance Corp	Agent	Y	Lincoln, NE, United States
03/2017 - 11/2019	David White & Associates	Agent	Y	Roseville, CA, United States
07/2004 - 03/2017	BROWN ROBELLO CAPITAL MANAGEMENT, LLC	INVESTMENT ADVISOR REPRESENTATIVE	Y	SACRAMENTO, CA, United States
06/2004 - 03/2017	AVISEN SECURITIES, INC.	REGISTERED REP.	Y	SACRAMENTO, 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) Fixed Insurance Sales. Not Investment related. Start date: 07/17/2024. Address: 8282 Seeno Ave, Granite Bay CA, 95746. Title: Agent. Duties: Marketing, presenting and selling fixed and fixed index insurance related products. Time spent during regular hours: 10%.

2) Roseville Area Chamber of Commerce. Not Investment related. Start date: 07/17/2024. Address: 650 Douglas Blvd. Roseville CA, 95678. Title: Volunteer Ambassador. Duties: Assisting members at events, helping set up and facilitate events for members and non-members, calling members to see how membership is going and to see if we can help make their experience better. Time spent during regular hours: 5%.

3) AmeriPlan. Not investment related. Start date: 10/1/2024. Address: 8282 Seeno Ave, Granite Bay CA, 95746. Title: Sales Representative. Duties: Placing ads and signing up individuals and groups to AmeriPlan's Health and Dental plans. No licensing required. Time spent during regular hours: 10%.

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
Termination	1
Judgment/Lien	2

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:	Stirlingshire BD LLC
Termination Type:	Discharged
Termination Date:	07/03/2024
Allegations:	Concerns that the RR accessed a customer account using the customer's provided personal login details and engaged in off channel communications in violation of the BD's policies.
Product Type:	No Product

Reporting Source:	Individual
Firm Name:	STIRLINGSHIRE INVESTMENTS
Termination Type:	Discharged
Termination Date:	07/03/2024
Allegations:	Concerns that the RR accessed a customer account using the customer's provided personal login details and engaged in off channel communications in violation of the BD's policies.
Product Type:	No Product
Broker Statement	As for the first accusation of not communicating on firm approved channels this appears to be just an erroneous charge. The CEO explained to me on the July 3rd, 2024 termination phone call that all advisors at Stirlingshire are required to only communicate with clients on the 8X8 portal which unbeknownst to me recorded all conversations for them to listen to. I was never informed of this. I have a written message saved from the CEO shortly after joining this firm stating

verbatim..."it (the 8X8 app.) will allow you to essentially have a second telephone number on your phone that you can call and text with". There never was a mention of this being mandatory.
As for the second charge of accessing a client's online portal. Due to the poor design of Stirlingshire's client facing portal virtually every one of my clients, as they came onboard, had difficulty either accessing, or navigating, their individual site to view (and potentially trade) their accounts. There was one instance when a woman who was not proficient with technology was having difficulty navigating her site and could not see the assets in her account. I attempted to verbally explain how to view these assets but due to the confusing nature of the dashboard she could not find them and began to exhibit stress thinking that her assets were somehow missing. As much as I attempted to reassure her the assets were here and accounted for, as I could see them on my advisor site, she continued to be stressed about her inability to see those holdings. She came up with the idea for me to go into her portal with her and show her how to find them. She gave, without me asking, her log-in credentials to access. Given that I can't see anything in her client portal that I don't already have access to in the advisor portal I saw no harm in helping to alleviate her stress and went in with her to show her that her assets have indeed successfully landed at the firm. Once I was able to help her locate them, she was relieved and thanked me. I immediately exited out of her site. Keep in mind that she gave me permission to enter and she could have easily changed her password to prevent any future re-entry if that was a concern. The way that Stirlingshire found out about this activity was because all of this was communicated through the 8X8 portal which the client called me through and Stirlingshire illegally recorded the entire conversation (there was no two-party consent). The client was HELPED, NOT HARMED, by my activity in this case, however, I was harmed because we were recorded without permission by my then firm which used that recording to terminate my affiliation with them.
The only conclusion I can surmise, after speaking with several industry participants and firm representatives after the termination occurred, is that for some reason Stirlingshire no longer wanted me there but did want my book of business. They unearthed two "parking ticket" level firm violations that could have happened to any new advisor who wasn't properly given the "rules of the road" to justify terminating me. There were no warnings, or second chances, which should have occurred but did not in my case. They did, however, aggressively pursue my book of business even to the point of allegedly performing unauthorized trades in a few accounts which is an activity that is an industry violation and, if proven, could warrant fines, sanctions and possible termination yet those advisors continue to be affiliated with Stirlingshire indicating that "industry and firm policies" only apply to some representatives, but not to others. I am aware of two clients who are currently pursuing formal complaints about the unauthorized trades to FINRA and the SEC.

Judgment/Lien

This disclosure event involves an unsatisfied and outstanding judgment or lien against the Investment Adviser Representative.

Disclosure 1 of 2

Reporting Source:	Individual
Judgment/Lien Holder:	State of California Franchise Tax Board
Judgment/Lien Amount:	$21,224.26
Judgment/Lien Type:	Tax
Date Filed with Court:	05/04/2023
Date Individual Learned:	06/13/2023
Type of Court:	State Court
Name of Court:	Superior Court of California
Location of Court:	Placer County California
Docket/Case #:	2023-0023213-00
Judgment/Lien Outstanding?	Yes

Disclosure 2 of 2

Reporting Source:	Individual
Judgment/Lien Holder:	State of California Franchise Tax Board
Judgment/Lien Amount:	$9,011.69
Judgment/Lien Type:	Tax
Date Filed with Court:	05/04/2023
Date Individual Learned:	06/13/2023
Type of Court:	State Court
Name of Court:	Superior Court of California
Location of Court:	Placer County California
Docket/Case #:	2023-0023212-00
Judgment/Lien Outstanding?	Yes

End of Report

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