



## IAPD Report

# AZIM NAKHOODA

CRD# 2913470

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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

### AZIM NAKHOODA (CRD# 2913470)

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 **07/01/2024**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	SEIA	CRD# 108163	06/19/2024
B	SIGNATURE ESTATE SECURITIES, LLC	CRD# 18923	06/20/2024

### 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
IA	CEDAR BROOK GROUP	290670	CLEVELAND, OH	03/01/2018 - 07/01/2024
IA	CADARET GRANT & CO INC	10641	Cleveland, OH	04/07/2021 - 06/17/2024
B	CADARET, GRANT & CO., INC.	10641	Cleveland, OH	04/07/2021 - 06/17/2024

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
Regulatory Event	4
Customer Dispute	13



## 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: **SIGNATURE ESTATE SECURITIES, LLC**  
Main Address: 2121 AVENUE OF STARS  
SUITE 1600  
LOS ANGELES, CA 90067  
Firm ID#: 18923

	Regulator	Registration	Status	Date
<b>B</b>	FINRA	General Securities Representative	Approved	06/20/2024
<b>B</b>	Connecticut	Agent	Approved	06/24/2024
<b>B</b>	Florida	Agent	Approved	06/21/2024
<b>B</b>	Georgia	Agent	Approved	06/21/2024
<b>B</b>	Michigan	Agent	Approved	06/24/2024
<b>B</b>	New York	Agent	Approved	08/28/2024
<b>B</b>	North Carolina	Agent	Approved	06/26/2024
<b>B</b>	Ohio	Agent	Approved	06/20/2024
<b>B</b>	Pennsylvania	Agent	Approved	06/21/2024
<b>B</b>	South Carolina	Agent	Approved	08/13/2024
<b>B</b>	Texas	Agent	Approved	06/20/2024
<b>B</b>	Virginia	Agent	Approved	06/26/2024

### Branch Office Locations



## Qualifications

5885 Landerbrook Dr., Suite 200  
Cleveland, OH 44124

5885 Landerbrook Dr., Suite 200  
Cleveland, OH 44124

### Employment 2 of 2

Firm Name: **SEIA**  
Main Address: 2121 AVENUE OF THE STARS  
SUITE 1600  
LOS ANGELES, CA 90067  
Firm ID#: 108163

	Regulator	Registration	Status	Date
IA	Ohio	Investment Adviser Representative	Approved	06/20/2024
IA	Texas	Investment Adviser Representative	Restricted Approval	06/19/2024

### Branch Office Locations

**SEIA**  
5885 Landerbrook Dr., Suite 200  
Cleveland, OH 44124



## 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 1 state securities law exam.**

#### Principal/Supervisory Exams

Exam	Category	Date
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No information reported.

#### General Industry/Product Exams

Exam	Category	Date
<b>B</b> Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
<b>B</b> Futures Managed Funds Examination (S31)	Series 31	11/02/2005
<b>B</b> General Securities Representative Examination (S7)	Series 7	08/25/1997

#### State Securities Law Exams

Exam	Category	Date
<b>B</b> Uniform Securities Agent State Law Examination (S63)	Series 63	02/22/2006



### 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	03/01/2018 - 07/01/2024	CEDAR BROOK GROUP	CRD# 290670	CLEVELAND, OH
IA	04/07/2021 - 06/17/2024	CADARET GRANT & CO INC	CRD# 10641	Cleveland, OH
B	04/07/2021 - 06/17/2024	CADARET, GRANT & CO., INC.	CRD# 10641	Cleveland, OH
B	12/24/2013 - 04/13/2021	SECURITIES AMERICA, INC.	CRD# 10205	MAYFIELD HEIGHTS, OH
IA	12/18/2013 - 04/13/2021	SECURITIES AMERICA ADVISORS, INC.	CRD# 110518	MAYFIELD HEIGHTS, OH
IA	08/11/2005 - 03/15/2013	SECURITIES AMERICA ADVISORS, INC.	CRD# 110518	MAYFIELD HEIGHTS, OH
B	08/04/2005 - 03/15/2013	SECURITIES AMERICA, INC.	CRD# 10205	MAYFIELD HEIGHTS, OH
IA	01/01/2000 - 08/03/2005	LINCOLN FINANCIAL ADVISORS CORPORATION	CRD# 3978	CLEVELAND, OH
B	08/26/1997 - 08/03/2005	LINCOLN FINANCIAL ADVISORS CORPORATION	CRD# 3978	FORT WAYNE, IN
B	08/26/1997 - 08/03/2005	THE LINCOLN NATIONAL LIFE INSURANCE COMPANY	CRD# 2580	FORT WAYNE, IN

### 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
06/2024 - Present	SEIA LLC	Partner	Y	Cleveland, OH, United States
06/2024 - Present	SES LLC	Partner	Y	Cleveland, OH, United States
04/2021 - 06/2024	Cadaret Grant & Co., Inc.	RR/IAR	Y	Cleveland, OH, United States
02/2018 - 06/2024	CEDAR BROOK FINANCIAL PARTNERS, LLC/DBA Cedar Brook Group	INVESTMENT ADVISER REPRESENTATIVE	Y	CLEVELAND, OH, United States



## Registration & Employment History

### EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
12/2013 - 04/2021	SECURITIES AMERICA ADVISORS, INC.	INVESTMENT ADVISOR REPRESENTATIVE	Y	MAYFIELD HEIGHTS, OH, United States
12/2013 - 04/2021	SECURITIES AMERICA, INC.	REGISTERED REPRESENTATIVE	Y	MAYFIELD HEIGHTS, 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) MONARCH INVESTMENT GROUP, LLC

INVESTMENT-RELATED - Aurora, OH - 50% owner, Start Date: 06/2017, LLC holding company for private/personal investments - 671 Club Drive, Aurora, OH, APPROX 1 HR/MONTH (APPROX 0 HRS/MONTH DURING TRADING HRS) - Direct investments with own capital.

2) NORTHEAST OHIO ARTHRITIS FOUNDATION

POSITION: Board member/volunteer, Charity/Non-Profit, NOT INVESTMENT RELATED, NUMBER OF HOURS: 2 SECURITIES TRADING HOURS: 0 START DATE: 09/27/2016 ADDRESS: 23811 Chagrin, Beachwood OH 44122 DESCRIPTION: Volunteer board member.

3) INSURANCE LICENSE - PRODUCER

POSITION: Insurance License Holder NATURE: Insurance sales & service. INVESTMENT RELATED: Yes NUMBER OF HOURS: 5 SECURITIES TRADING HOURS: 2 START DATE: 6-14-2024 ADDRESS: 5885 Landerbrook Dr., Suite 200, Cleveland OH, 44124, United States DESCRIPTION: Insurance sales and service consistent with financial planning.

4) SEIA LLC

POSITION: Partner NATURE: LLC INVESTMENT RELATED: Yes NUMBER OF HOURS: 160 SECURITIES TRADING HOURS: 120 START DATE: 06/14/2024 ADDRESS: 5885 Landerbrook Dr., Suite 200, Cleveland OH, 44124, United States DESCRIPTION: RIA sales & service





## 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	4
Customer Dispute	13

### 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 4

<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	OHIO DEPARTMENT OF INSURANCE
<b>Sanction(s) Sought:</b>	Other: ADMINISTRATIVE ACTION
<b>Date Initiated:</b>	04/22/2014
<b>Docket/Case Number:</b>	18400
<b>URL for Regulatory Action:</b>	
<b>Employing firm when activity occurred which led to the regulatory action:</b>	SECURITIES AMERICA, INC.
<b>Product Type:</b>	No Product
<b>Allegations:</b>	FAILURE TO TIMELY REPORT FINRA AND MICHIGAN DIVISION OF SECURITIES SUSPENSIONS TO OHIO INSURANCE REGULATOR
<b>Current Status:</b>	Final
<b>Resolution:</b>	Order
<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>	04/28/2014



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

**Monetary Sanction 1 of 2**

**Monetary Related Sanction:** Monetary Penalty other than Fines

**Total Amount:** \$100.00

**Portion Levied against individual:** \$100.00

**Payment Plan:**

**Is Payment Plan Current:**

**Date Paid by individual:** 05/28/2014

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

**Amount Waived:**

**Monetary Sanction 2 of 2**

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

**Total Amount:** \$400.00

**Portion Levied against individual:** \$400.00

**Payment Plan:**

**Is Payment Plan Current:**

**Date Paid by individual:** 05/28/2014

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

**Amount Waived:**

**Reporting Source:** Individual

**Regulatory Action Initiated By:** OHIO DEPARTMENT OF INSURANCE

**Sanction(s) Sought:** Other: N/A

**Date Initiated:** 04/28/2014

**Docket/Case Number:** N/A

**Employing firm when activity occurred which led to the regulatory action:** SECURITIES AMERICA, INC.

**Product Type:** No Product

**Allegations:** VIOLATIONS OF THE OHIO REVISED CODE, SECTION 3905.22: FAILURE TO TIMELY REPORT A REGULATORY ACTION ON A PROFESSIONAL LICENSE.

**Current Status:** Final

**Resolution:** Order



<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>	04/28/2014
<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>	\$500.00
<b>Portion Levied against individual:</b>	\$500.00
<b>Payment Plan:</b>	N/A
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	05/09/2014
<b>Was any portion of penalty waived?</b>	No
<b>Amount Waived:</b>	
<b>Broker Statement</b>	A CIVIL PENALTY IN THE AMOUNT OF \$400 WAS ASSESSED ALONG WITH \$100 FOR ADMINISTRATIVE COSTS. THE TOTAL AMOUNT OF \$500 HAS BEEN PAID IN FULL.
<b>Disclosure 2 of 4</b>	
<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	MICHIGAN
<b>Sanction(s) Sought:</b>	Suspension
<b>Date Initiated:</b>	10/24/2013
<b>Docket/Case Number:</b>	321667
<b>URL for Regulatory Action:</b>	
<b>Employing firm when activity occurred which led to the regulatory action:</b>	N/A
<b>Product Type:</b>	No Product
<b>Allegations:</b>	PLEASE CONTACT AGENCY FOR ADDITIONAL INFORMATION.
<b>Current Status:</b>	Final
<b>Resolution:</b>	Order



**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:**

10/24/2013

**Sanctions Ordered:**

Suspension

**Sanction 1 of 1**

**Sanction Type:**

Suspension

**Capacities Affected:**

SECURITIES AGENT REGISTRATION

**Duration:**

54 DAYS

**Start Date:**

10/24/2013

**End Date:**

12/17/2013

**Reporting Source:**

Individual

**Regulatory Action Initiated By:**

MICHIGAN DEPARTMENT OF LICENSING & REGULATORY AFFAIRS, CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU

**Sanction(s) Sought:**

Suspension

**Date Initiated:**

10/24/2013

**Docket/Case Number:**

321667

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

SECURITIES AMERICA, INC.

**Product Type:**

No Product

**Allegations:**

PER SECTION 412(6) OF THE MICHIGAN UNIFORM SECURITIES ACT, THE REPRESENTATIVE ENGAGED IN DISHONEST OR UNETHICAL PRACTICES IN THE SECURITIES AND INVESTMENT BUSINESS WITHIN THE PREVIOUS 10 YEARS, HAS BEEN SUSPENDED FROM FINRA MEMBERSHIP, AND HAS HAD HIS SECURITIES AND INVESTMENT ADVISER REPRESENTATIVE LICENSES SUSPENDED BY THE STATE OF OHIO.

**Current Status:**

Final

**Resolution:**

Order

**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:**

10/24/2013

**Sanctions Ordered:**

Suspension

**Sanction 1 of 1**

**Sanction Type:**

Suspension



**Capacities Affected:** SECURITIES AGENT REGISTRATION

**Duration:** 54 DAYS

**Start Date:** 10/24/2013

**End Date:** 12/17/2013

#### Disclosure 3 of 4

**Reporting Source:** Regulator

**Regulatory Action Initiated By:** OHIO DEPARTMENT OF COMMERCE, DIVISION OF SECURITIES

**Sanction(s) Sought:** Suspension

**Date Initiated:** 04/08/2013

**Docket/Case Number:** 13-010

**URL for Regulatory Action:**

**Employing firm when activity occurred which led to the regulatory action:** CEDAR BROOK FINANCIAL PARTNERS, LLC

**Product Type:** Investment Contract

**Allegations:** NAKHOODA MISREPRESENTED MATERIAL FACTS ABOUT THE LIQUIDITY OF INVESTMENTS IN THE IMH FUND.

**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:** 04/08/2013

**Sanctions Ordered:** Suspension

**Sanction 1 of 1**

**Sanction Type:** Suspension

**Capacities Affected:** OHIO SECURITIES SALESPERSON/INVESTMENT ADVISER REPRESENTATIVE LICENSES

**Duration:** 9 MONTHS

**Start Date:** 03/18/2013

**End Date:** 12/17/2013

**Regulator Statement** THE OHIO DIVISION OF SECURITIES ISSUED ORDER NO. 13-010, WITH CONSENT, FINDING THAT NAKHOODA HAD VIOLATED R.C. 1707 44(B)(4) AND WAS NOT OF "GOOD BUSINESS REPUTE" PURSUANT TO R.C. 1707. 19(A)(1), OAC 1301:6-3-19(D)(7) & (A) BASED ON FINDINGS THAT HE HAD PROVIDED FALSE AND MISLEADING INFORMATION TO CLIENTS ABOUT INVESTMENTS IN THE IMH FUND. NAKHOODA'S OHIO LICENSE WAS



SUSPENDED FROM 3/18/13 THROUGH 12/17/13."

.....

**Reporting Source:** Firm

**Regulatory Action Initiated By:** OHIO DIVISION OF SECURITIES

**Sanction(s) Sought:** Suspension

**Date Initiated:** 04/08/2013

**Docket/Case Number:** 13-010

**Employing firm when activity occurred which led to the regulatory action:** SECURITIES AMERICA, INC.

**Product Type:** Direct Investment-DPP & LP Interests

**Allegations:** THE OHIO DIVISION OF SECURITIES AND THE REPRESENTATIVE ENTERED INTO A SUSPENSION ORDER AND CONSENT AGREEMENT RELATING TO FINDINGS THAT THE REPRESENTATIVE WAS NOT OF GOOD BUSINESS REPUTE AS SET FORTH IN R.C. 1707.19(A)(1); BASED ON CONSIDERATIONS SET FORTH IN O.A.C. 1301:6-3-19(D)(7) AND 1301:6-3-19(D)(9). THE DIVISION FURTHER FOUND THAT THE REPRESENTATIVE VIOLATED R.C. 1707.44(B)(4). THE FINDINGS RELATE TO FINRA MATTER NO. 2010022518102, WHEREIN THE REPRESENTATIVE AND FINRA ENTERED INTO AN ACCEPTANCE, WAIVER, AND CONSENT (AWC). WITHOUT ADMITTING OR DENYING THE FINRA FINDINGS, THE REPRESENTATIVE AGREED TO FINRA'S SANCTIONS OF A FINE AND SUSPENSION.

**Current Status:** Final

**Resolution:** SUSPENSION ORDER AND CONSENT AGREEMENT

**Resolution Date:** 04/08/2013

**Sanctions Ordered:** Suspension

**Sanction 1 of 1**

**Sanction Type:** Suspension

**Capacities Affected:** ALL CAPACITIES

**Duration:** NINE MONTHS

**Start Date:** 03/18/2013

**End Date:** 12/17/2013

**Firm Statement** PURSUANT TO THE OHIO DIVISION OF SECURITIES REVISED CODE CHAPTER 1707.19(A), THE REPRESENTATIVE'S SUSPENSION WILL OCCUR RETROACTIVELY AND CONCURRENTLY WITH THE FINRA SUSPENSION.

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**Reporting Source:** Individual

**Regulatory Action Initiated By:** OHIO DIVISION OF SECURITIES

**Sanction(s) Sought:** Suspension

**Date Initiated:** 04/08/2013



<b>Docket/Case Number:</b>	13-010
<b>Employing firm when activity occurred which led to the regulatory action:</b>	SECURITIES AMERICA, INC.
<b>Product Type:</b>	Direct Investment-DPP & LP Interests
<b>Allegations:</b>	THE OHIO DIVISION OF SECURITIES AND THE REPRESENTATIVE ENTERED INTO A SUSPENSION ORDER AND CONSENT AGREEMENT RELATING TO FINDINGS THAT THE REPRESENTATIVE WAS NOT OF GOOD BUSINESS REPUTE AS SET FORTH IN R.C. 1707.19(A)(1); BASED ON CONSIDERATIONS SET FORTH IN O.A.C. 1301:6-3-19(D)(7) AND 1301:6-3-19(D)(9). THE DIVISION FURTHER FOUND THAT THE REPRESENTATIVE VIOLATED R.C. 1707.44(B)(4). THE FINDINGS RELATE TO FINRA MATTER NO. 2010022518102, WHEREIN THE REPRESENTATIVE AND FINRA ENTERED INTO AN ACCEPTANCE, WAIVER, AND CONSENT (AWC). WITHOUT ADMITTING OR DENYING THE FINRA FINDINGS, THE REPRESENTATIVE AGREED TO FINRA'S SANCTIONS OF A FINE AND SUSPENSION.
<b>Current Status:</b>	Final
<b>Resolution:</b>	SUSPENSION ORDER AND CONSENT AGREEMENT
<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>	04/08/2013
<b>Sanctions Ordered:</b>	Suspension
<b>Sanction 1 of 1</b>	
<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	ALL CAPACITIES
<b>Duration:</b>	NINE MONTHS
<b>Start Date:</b>	03/18/2013
<b>End Date:</b>	12/17/2013
<b>Disclosure 4 of 4</b>	
<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	FINRA
<b>Sanction(s) Sought:</b>	Other: N/A
<b>Date Initiated:</b>	02/20/2013
<b>Docket/Case Number:</b>	<a href="#">2010022518103</a>
<b>Employing firm when activity occurred which led to the regulatory action:</b>	SECURITIES AMERICA, INC.





<b>Product Type:</b>	Promissory Note Other: MORTGAGE LOANS
<b>Allegations:</b>	<p>NASD RULES 2110, 2210(D)(1)(A), 2210(D)(1)(B), AND 2211(D)(1): NAKHOODA SENT EMAILS TO MEMBER FIRM CUSTOMERS IN CONNECTION WITH THEIR PURCHASES OF UNITS IN A FUND AND PROMISSORY NOTES THAT CONTAINED FALSE AND MISLEADING STATEMENTS, INCLUDING MATERIAL MISREPRESENTATIONS REGARDING THE LIQUIDITY AND SAFETY OF THE FUND AND THE SAFETY OF THE NOTES.</p> <p>NAKHOODA'S STATEMENTS TO CUSTOMERS RELATING TO THE FUND'S LIQUIDITY DIRECTLY CONTRADICTED THE DISCLOSURES IN THE FUND'S PRIVATE PLACEMENT MEMORANDUM (PPM) ABOUT THE ILLIQUIDITY OF THE FUND AND THE SIGNIFICANT LIMITATIONS ON REDEMPTIONS. NAKHOODA'S STATEMENTS REGARDING THE SAFETY OF THE FUND ALSO DIRECTLY CONTRADICTED THE DISCLOSURES OF SIGNIFICANT RISKS IN THE FUND'S PPM. THE EXECUTIVE SUMMARY OF THE NOTES THAT NAKHOODA EMAILED STATED THAT THE NOTES PROVIDED "PRINCIPAL PROTECTION," WHICH WAS DIRECTLY CONTRARY TO DISCLOSURES IN THE NOTE'S PPM ABOUT THE POTENTIAL RISKS TO PRINCIPAL. THEREFORE, NAKHOODA'S REPRESENTATIONS TO THE CUSTOMERS REGARDING THE LIQUIDITY AND SAFETY OF THE FUND AND THE PRINCIPAL PROTECTION AFFORDED BY THE NOTES WERE FALSE AND MISLEADING.</p> <p>NAKHOODA SENT THE FUND'S EXECUTIVE SUMMARY TO FIRM CUSTOMERS WHO DID NOT PURCHASE THE FUND. THE EXECUTIVE SUMMARY REPRESENTED THAT THE FUND WAS COMPLETELY LIQUID AFTER 60 DAYS OR COMPLETELY LIQUID AFTER 90 DAYS. THESE STATEMENTS WERE FALSE. OTHER STATEMENTS IN THE FUND'S EXECUTIVE SUMMARY EXAGGERATED THE SAFETY OF THE FUND IN LIGHT OF THE RISKS PRESENTED BY THE FUND'S PPM. NAKHOODA'S REPRESENTATIONS TO CUSTOMERS REGARDING THE SAFETY OF THE FUND WERE, THEREFORE, MISLEADING.</p> <p>NAKHOODA SENT THE NOTE'S EXECUTIVE SUMMARY TO FIRM CUSTOMERS WHO DID NOT PURCHASE THE NOTES. THE NOTE'S EXECUTIVE SUMMARY CLAIMED THAT NOTES PROVIDED PRINCIPAL PROTECTION WHICH DIRECTLY CONTRADICTED DISCLOSURES IN THE NOTE'S PPM ABOUT THE POTENTIAL RISKS TO PRINCIPAL. OTHER STATEMENTS IN THE NOTE'S EXECUTIVE SUMMARY EXAGGERATED THE SAFETY OF THE NOTES IN LIGHT OF THE RISKS PRESENTED BY THE NOTE'S PPM. NAKHOODA'S REPRESENTATIONS TO CUSTOMERS REGARDING THE SAFETY OF THE NOTES WERE, THEREFORE, MISLEADING.</p> <p>NONE OF NAKHOODA'S COMMUNICATIONS WITH ANY OF THE FIRM CUSTOMERS PROVIDED A BALANCED DISCUSSION OF THE FUND AND NOTES AND INSTEAD ADDRESSED ONLY POSITIVE ATTRIBUTES OF THE INVESTMENTS. THE COMMUNICATIONS OMITTED ANY DISCUSSION OF THE SIGNIFICANT RISKS ASSOCIATED WITH AN INVESTMENT IN THE FUND AND THE NOTES.</p>
<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



**Resolution Date:** 02/20/2013

**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:** ANY CAPACITY  
**Duration:** NINE MONTHS  
**Start Date:** 03/18/2013  
**End Date:** 12/17/2013

**Monetary Sanction 1 of 1**

**Monetary Related Sanction:** Civil and Administrative Penalty(ies)/Fine(s)  
**Total Amount:** \$50,000.00  
**Portion Levied against individual:** \$50,000.00  
**Payment Plan:**  
**Is Payment Plan Current:**  
**Date Paid by individual:** 03/13/2013  
**Was any portion of penalty waived?** No

**Amount Waived:**

**Regulator Statement** WITHOUT ADMITTING OR DENYING THE FINDINGS, NAKHOODA CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE HE IS FINED \$50,000 AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY FOR NINE MONTHS. THE SUSPENSION IS IN EFFECT FROM MARCH 18, 2013 THROUGH DECEMBER 17, 2013. FINE PAID IN FULL 3/13/13.

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**Reporting Source:** Individual  
**Regulatory Action Initiated By:** FINRA  
**Sanction(s) Sought:** Civil and Administrative Penalty(ies)/Fine(s)  
Suspension



<b>Date Initiated:</b>	02/20/2013
<b>Docket/Case Number:</b>	<a href="#">2010022518103</a>
<b>Employing firm when activity occurred which led to the regulatory action:</b>	SECURITIES AMERICA, INC.
<b>Product Type:</b>	Direct Investment-DPP & LP Interests
<b>Allegations:</b>	FROM OCTOBER 2007 TO SEPTEMBER 2008, THE REPRESENTATIVE SENT EMAILS TO FOURTEEN CUSTOMERS WITH REGARD TO THE IMH SECURED LOAN FUND, LLC ("IMH FUND") AND/OR NOTES ISSUED BY MEDICAL PROVIDER FUNDING CORPORATION V ("MED CAP V"). FINRA ALLEGED THAT THE EMAILS CONTAINED MISREPRESENTATIONS REGARDING THE FEATURES OF THE IMH FUND AND MED CAP V; IN VIOLATION OF NASD RULES 2110. FINRA ALSO ALLEGED THAT THE REPRESENTATIVE VIOLATED NASD RULES 2210(D)(1)(A), 2210(D)(1)(B), 2211(D)(1), AND 2110 BECAUSE THESE EMAILS FAILED TO COMPLY WITH THE CONTENT STANDARDS FOR COMMUNICATIONS WITH CUSTOMERS.
<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>	02/20/2013
<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>	9 MONTHS
<b>Start Date:</b>	03/18/2013
<b>End Date:</b>	12/17/2013
<b>Monetary Sanction 1 of 1</b>	
<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$50,000.00
<b>Portion Levied against individual:</b>	\$50,000.00
<b>Payment Plan:</b>	
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	03/04/2013
<b>Was any portion of penalty waived?</b>	No



**Amount Waived:**

**Broker Statement**

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE REPRESENTATIVE  
CONSENTED TO THE SANCTIONS OF A \$50,000 FINE AND 9 MONTH  
SUSPENSION. THE SUSPENSION IS IN EFFECT FROM MARCH 18, 2013  
THROUGH DECEMBER 17, 2013.



## 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 13

<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	SECURITIES AMERICA, INC
<b>Allegations:</b>	ONE OF THE TRUSTEES OF THE [CUSTOMER] TRUST ALLEGES THAT IN APRIL, 2009, REG REP RECOMMENDED THE PURCHASE OF A HINES REIT AND THAT THE REIT WAS AN UNSUITABLE INVESTMENT DUE TO THE INVESTMENT NOT BEING LIQUID.
<b>Product Type:</b>	Real Estate Security
<b>Alleged Damages:</b>	\$5,000.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	NO SPECIFIC DAMAGE AMOUNT WAS ALLEGED, HOWEVER, THE FIRM COULD NOT MAKE A GOOD FAITH DETERMINATION THAT THE DAMAGES FROM THE ALLEGED CONDUCT WERE LESS THAN \$5,000.
<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>	11/10/2014
<b>Complaint Pending?</b>	No
<b>Status:</b>	Denied
<b>Status Date:</b>	01/08/2015
<b>Settlement Amount:</b>	
<b>Individual Contribution Amount:</b>	
<b>Broker Statement</b>	THIS WAS A SUITABLE RECOMMENDATION, WAS FULLY EXPLAINED TO THE CLIENT, INCLUDING ALL ASPECTS OF LIQUIDITY, WAS IN THE CONTEXT OF AN OVERALL INVESTMENT STRATEGY, AND HAS PERFORMED WELL. DESPITE MY REPEATED ADVICE OVER MANY YEARS, THE CLIENT HAS CONTINUED TO SPEND DOWN HER ASSETS AT A RATE THAT HER INVESTMENTS COULD NOT SUSTAIN. THE COMPLAINT IS ONLY BEING BROUGHT ABOUT AT THIS TIME DUE TO THE DEPLETION OF HER ASSETS.

### Disclosure 2 of 13

<b>Reporting Source:</b>	Firm
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**Employing firm when activities occurred which led to the complaint:**

SECURITIES AMERICA, INC.

**Allegations:**

CLIENT ALLEGES THAT THE MEDICAL PROVIDER FINANCIAL CORPORATION V AND IMH SECURED LOAN FUND HE PURCHASED UNDER THE RECOMMENDATION OF THE REPRESENTATIVE WERE UNSUITABLE. CLIENT ALSO ALLEGES THE REPRESENTATIVE MISREPRESENTED THE INVESTMENTS AS SAVE INVESTMENTS.

**Product Type:**

Other: PRIVATE PLACEMENTS

**Alleged Damages:**

\$100,000.00

**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:**

10/18/2013

**Complaint Pending?**

Yes

**Settlement Amount:**

**Individual Contribution Amount:**

**Reporting Source:**

Individual

**Employing firm when activities occurred which led to the complaint:**

SECURITIES AMERICA, INC.

**Allegations:**

CLIENT ALLEGES THAT THE MEDICAL PROVIDER FINANCIAL CORPORATION V AND IMH SECURED LOAN FUND HE PURCHASED UNDER THE RECOMMENDATION OF THE REPRESENTATIVE WERE UNSUITABLE. CLIENT ALSO ALLEGES THE REPRESENTATIVE MISREPRESENTED THE INVESTMENTS AS SAFE INVESTMENTS.

**Product Type:**

Other: PRIVATE PLACEMENTS

**Alleged Damages:**

\$100,000.00

**Is this an oral complaint?**

No

**Is this a written complaint?**

Yes

**Is this an arbitration/CFTC reparation or civil litigation?**

Yes

**Arbitration/Reparation forum or court name and location:**

FINRA

**Docket/Case #:**

14-00312

**Filing date of arbitration/CFTC reparation or civil litigation:**

01/27/2014

### Customer Complaint Information



**Date Complaint Received:** 03/06/2014

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 03/15/2015

**Settlement Amount:** \$20,000.00

**Individual Contribution Amount:** \$0.00

**Broker Statement**

THE REPRESENTATIVE IS NOT A NAMED RESPONDENT IN THIS MATTER. 08/06/2015: SETTLEMENT DATE WAS ENTERED IN ERROR AS 03/06/2014. THE DATE SHOULD HAVE BEEN 03/15/2015 WHICH HAS BEEN AMENDED. ADDITIONALLY, THERE WAS A COMPUTER GLITCH ON THE FILING SUBMITTED 04/02/2015. IT DID NOT UPDATE THE CRD TO REFLECT THAT THE MATTER HAD SETTLED NOR DID IT UPDATE ON BROKER CHECK. SAI WILL BE SUBMITTING EVIDENCE VIA FINRA DISCLOSURE REVIEW IN THE HOPES THAT FINRA WILL CORRECT ISSUE. THE REPRESENTATIVE AND THE FIRM SHOULD BE HELD HARMLESS IN THIS MATTER AS ALL PARTIES SUBMITTED THE FILINGS AS REQUIRED AND WITHIN FINRA GUIDELINE.

### Disclosure 3 of 13

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** SECURITIES AMERICA, INC.

**Allegations:** CLIENT ALLEGES THAT THE IMH SECURED LOAN FUND HE PURCHASED WAS MISREPRESENTED TO HIM BY THE REPRESENTATIVE.

**Product Type:** Other: PRIVATE PLACEMENT

**Alleged Damages:** \$5,000.00

**Alleged Damages Amount Explanation (if amount not exact):** AN EXACT DAMAGE AMOUNT WAS NOT SPECIFIED BUT THE FIRM CANNOT DETERMINE IN GOOD FAITH THAT THE ALLEGED DAMAGES WOULD BE LESS THAN \$5,000.

**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:** 06/08/2013

**Complaint Pending?** No

**Status:** Denied

**Status Date:** 08/29/2013

**Settlement Amount:**

**Individual Contribution Amount:**

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**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** SECURITIES AMERICA, INC.

**Allegations:** CLIENT ALLEGES THAT THE IMH SECURED LOAN FUND HE PURCHASED WAS MISREPRESENTED TO HIM BY THE REPRESENTATIVE.

**Product Type:** Other: PRIVATE PLACEMENT

**Alleged Damages:** \$5,000.00

**Alleged Damages Amount Explanation (if amount not exact):** AN EXACT DAMAGE AMOUNT WAS NOT SPECIFIED BUT THE FIRM CANNOT DETERMINE IN GOOD FAITH THAT THE ALLEGED DAMAGES WOULD BE LESS THAN \$5,000.

**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:** 06/08/2013

**Complaint Pending?** No

**Status:** Denied

**Status Date:** 08/29/2013

**Settlement Amount:**

**Individual Contribution Amount:**

### Disclosure 4 of 13

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** SECURITIES AMERICA, INC.

**Allegations:** CLIENT ALLEGES REPRESENTATIVE DID NOT APPROPRIATELY DISCLOSE THE RISKS OF THE IMH SECURED LOAN FUND.

**Product Type:** Direct Investment-DPP & LP Interests

**Alleged Damages:** \$180,000.00

**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:** 05/23/2013

**Complaint Pending?** No

**Status:** Denied



**Status Date:** 07/24/2013

**Settlement Amount:**

**Individual Contribution Amount:**

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**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** SECURITIES AMERICA, INC.

**Allegations:** CLIENT ALLEGES REPRESENTATIVE DID NOT APPROPRIATELY DISCLOSE THE RISKS OF THE IMH SECURED LOAN FUND.

**Product Type:** Direct Investment-DPP & LP Interests

**Alleged Damages:** \$180,000.00

**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:** 05/23/2013

**Complaint Pending?** No

**Status:** Denied

**Status Date:** 07/24/2013

**Settlement Amount:**

**Individual Contribution Amount:**

### Disclosure 5 of 13

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** SECURITIES AMERICA, INC.

**Allegations:** CLIENT ALLEGES THE REPRESENTATIVE RECOMMENDED SHE PURCHASE HIGH RISK AND UNSUITABLE PRODUCTS.

**Product Type:** Direct Investment-DPP & LP Interests  
Real Estate Security

**Alleged Damages:** \$5,000.00

**Alleged Damages Amount Explanation (if amount not exact):** NO SPECIFIC DAMAGE AMOUNT WAS ALLEGED. CLIENT REQUESTED TO BE REPAYED LOST FUNDS FROM HER INVESTMENTS.

**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: 06/06/2013

Complaint Pending? No

Status: Denied

Status Date: 07/24/2013

Settlement Amount:

Individual Contribution  
Amount:

Reporting Source: Individual

Employing firm when  
activities occurred which led  
to the complaint: SECURITIES AMERICA, INC.

Allegations: CLIENT ALLEGES THE REPRESENTATIVE RECOMMENDED SHE PURCHASE  
HIGH RISK AND UNSUITABLE PRODUCTS.

Product Type: Direct Investment-DPP & LP Interests

Alleged Damages: \$5,000.00

Alleged Damages Amount  
Explanation (if amount not  
exact): NO SPECIFIC DAMAGE AMOUNT WAS ALLEGED. CLIENT REQUESTED TO  
BE REPAYED LOST FUNDS FROM HER INVESTMENTS.

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: 06/06/2013

Complaint Pending? No

Status: Denied

Status Date: 07/24/2013

Settlement Amount:

Individual Contribution  
Amount:

### Disclosure 6 of 13

Reporting Source: Firm

Employing firm when  
activities occurred which led  
to the complaint: SECURITIES AMERICA, INC.

Allegations: IN CONNECTION WITH THE RECOMMENDATION AND SALE OF AN



ALTERNATIVE INVESTMENT IN JANUARY OF 2008, CLAIMANT ALLEGES MISREPRESENTATION AND UNSUITABILITY. ADDITIONAL ALLEGATIONS ARE BREACH OF FIDUCIARY DUTY, FRAUD, VIOLATIONS OF SEC RULE 10B-5, AND NEGLIGENCE.

**Product Type:** Direct Investment-DPP & LP Interests

**Alleged Damages:** \$250,000.00

### Arbitration Information

**Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):** FINRA

**Docket/Case #:** 13-00683

**Date Notice/Process Served:** 03/27/2013

**Arbitration Pending?** Yes

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** SECURITIES AMERICA, INC.

**Allegations:** CLAIMANT ALLEGES THAT BETWEEN DECEMBER 2007 AND JANUARY 2008, THE REPRESENTATIVE RECOMMENDED AND SOLD HIM AN ALTERNATIVE INVESTMENT THAT WAS UNSUITABLE. ADDITIONAL ALLEGATIONS ARE MISREPRESENTATION, BREACH OF FIDUCIARY DUTY, FRAUD VIOLATIONS OF SEC RULE 10B-5, AND NEGLIGENCE.

**Product Type:** Direct Investment-DPP & LP Interests

**Alleged Damages:** \$250,000.00

### Arbitration Information

**Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):** FINRA

**Docket/Case #:** 13-00683

**Date Notice/Process Served:** 03/27/2013

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 05/28/2014

**Monetary Compensation Amount:** \$120,000.00

**Individual Contribution Amount:** \$0.00

**Broker Statement** THIS CLAIM WAS SETTLED BY SECURITIES AMERICA, INC. MR. NAKHOODA WAS NOT ASKED TO, NOR DID HE, CONTRIBUTE TO THIS SETTLEMENT.

### Disclosure 7 of 13

**Reporting Source:** Individual



<b>Employing firm when activities occurred which led to the complaint:</b>	SECURITIES AMERICA, INC.
<b>Allegations:</b>	IN CONNECTION WITH INVESTMENTS IN MEDICAL CAPITAL, CLAIMANTS ALLEGE NEGLIGENCE, NEGLIGENT MISREPRESENTATIONS, BREACH OF FIDUCIARY DUTY, VIOLATIONS OF OHIO BLUE SKY LAWS, AND AIDING & ABETTING FRAUD.
<b>Product Type:</b>	Direct Investment-DPP & LP Interests
<b>Alleged Damages:</b>	\$3,187,000.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	THIS IS A MULTI-CLIENT CLAIM INVOLVING MORE THAN ONE REPRESENTATIVE. ALLEGED DAMAGES FOR THIS REPRESENTATIVE ARE \$700,000.
<b>Arbitration Information</b>	
<b>Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):</b>	FINRA
<b>Docket/Case #:</b>	09-07274
<b>Date Notice/Process Served:</b>	06/02/2010
<b>Arbitration Pending?</b>	No
<b>Disposition:</b>	Settled
<b>Disposition Date:</b>	09/29/2011
<b>Monetary Compensation Amount:</b>	\$1,479,386.47
<b>Individual Contribution Amount:</b>	\$0.00
<b>Broker Statement</b>	10/03/2011: THIS CLAIM WAS PART OF A GLOBAL SETTLEMENT BY SECURITIES AMERICA, INC.
<b>Disclosure 8 of 13</b>	
<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	SECURITIES AMERICA, INC.
<b>Allegations:</b>	IN CONNECTION WITH THE RECOMMENDATION AND SALE OF MEDICAL CAPITAL, CLAIMANTS ALLEGE VIOLATION OF DUTIES OWED TO CLAIMANTS, MISREPRESENTATION AND OMISSIONS, NEGLIGENCE AND FRAUD.
<b>Product Type:</b>	Direct Investment-DPP & LP Interests
<b>Alleged Damages:</b>	\$15,000.00
<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>	Yes



**Arbitration/Reparation forum  
or court name and location:** FINRA

**Docket/Case #:** 11-01379

**Filing date of  
arbitration/CFTC reparation  
or civil litigation:** 04/01/2011

### Customer Complaint Information

**Date Complaint Received:** 05/03/2011

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 09/29/2011

**Settlement Amount:** \$69,629.11

**Individual Contribution  
Amount:** \$0.00

**Broker Statement** AZIM NAKHOODA IS NOT A NAMED RESPONDENT IN THIS MATTER.  
10/03/2011: THIS CLAIM WAS PART OF A GLOBAL SETTLEMENT BY  
SECURITIES AMERICA, INC.

### Disclosure 9 of 13

**Reporting Source:** Individual

**Employing firm when  
activities occurred which led  
to the complaint:** SECURITIES AMERICA, INC.

**Allegations:** IN CONNECTION WITH THE RECOMMENDATION AND SALE OF AN  
ALTERNATIVE INVESTMENT, CLAIMANT ALLEGES VIOLATION OF THE OHIO  
SECURITIES ACT, BREACH OF FIDUCIARY DUTY, FRAUD,  
NEGLIGENCE, AND NEGLIGENT MISREPRESENTATION.

**Product Type:** Other: ALTERNATIVE INVESTMENT PRODUCT

**Alleged Damages:** \$650,000.00

### Arbitration Information

**Arbitration/CFTC reparation  
claim filed with (FINRA, AAA,  
CFTC, etc.):** FINRA

**Docket/Case #:** 11-00370

**Date Notice/Process Served:** 02/07/2011

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 02/03/2012

**Monetary Compensation  
Amount:** \$270,000.00

**Individual Contribution  
Amount:** \$0.00

**Broker Statement** THIS CLAIM WAS SETTLED BY SECURITIES AMERICA, INC. MR. NAKHOODA



WAS NOT ASKED TO, NOR DID HE, CONTRIBUTE TO THIS SETTLEMENT.

### Disclosure 10 of 13

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** SECURITIES AMERICA, INC.

**Allegations:** IN CONNECTION WITH THE RECOMMENDATION AND SALE OF PROVIDENT SHALE, CLAIMANTS ALLEGE VIOLATIONS OF OHIO BLUE SKY LAWS, VIOLATIONS OF FINRA RULE 2110, NEGLIGENCE, NEGLIGENT MISREPRESENTATIONS AND OMISSIONS, BREACH OF FIDUCIARY DUTY, AND AIDING & ABETTING FRAUD.

**Product Type:** Oil & Gas

**Alleged Damages:** \$300,000.00

**Arbitration Information**

**Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):** FINRA

**Docket/Case #:** 10-02558

**Date Notice/Process Served:** 06/28/2010

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 09/29/2011

**Monetary Compensation Amount:** \$139,258.22

**Individual Contribution Amount:** \$0.00

**Broker Statement** 10/03/2011: THIS CLAIM WAS PART OF A GLOBAL SETTLEMENT BY SECURITIES AMERICA, INC.

### Disclosure 11 of 13

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** SECURITIES AMERICA, INC.

**Allegations:** IN CONNECTION WITH THE RECOMMENDATION AND SALE OF MEDICAL CAPITAL AND IMH CLAIMANTS ALLEGE FRAUD, NEGLIGENCE, MISREPRESENTATION AND OMISSION OF MATERIAL FACTS, AND VIOLATIONS OF FINRA RULES. IN CONNECTION WITH THE SALE OF GOLDMAN SACHS, CLAIMANTS ALLEGE OVERCONCENTRATION.

**Product Type:** Direct Investment-DPP & LP Interests  
Mutual Fund  
Real Estate Security

**Alleged Damages:** \$3,966,000.00

**Alleged Damages Amount** THIS IS A MULTI-CUSTOMER CLAIM INVOLVING MULTIPLE



**Explanation (if amount not exact):** REPRESENTATIVES. ALLEGED DAMAGES FOR THIS REPRESENTATIVE ARE \$2,095,000.

### Arbitration Information

**Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):** FINRA

**Docket/Case #:** 10-01967

**Date Notice/Process Served:** 05/24/2010

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 09/29/2011

**Monetary Compensation Amount:** \$2,761,026.27

**Individual Contribution Amount:** \$0.00

**Broker Statement** 10/03/2011: THE PORTION OF THIS CLAIM PERTAINING TO MEDICAL CAPITAL WAS PART OF A GLOBAL SETTLEMENT BY SECURITIES AMERICA, INC. CLAIMS RELATING TO ADDITIONAL PRODUCTS CONTINUE AT THIS TIME. 01/12/2012: I WAS DISMISSED FROM THIS MATTER WITH PREJUDICE.

### Disclosure 12 of 13

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** SECURITIES AMERICA, INC. AND SECURITIES AMERICA ADVISORS, INC.

**Allegations:** IN CONNECTION WITH THE RECOMMENDATION AND SALE OF MEDICAL CAPITAL AND OTHER ALTERNATIVE INVESTMENTS, CLAIMANTS ALLEGE MISREPRESENTATION, OMISSIONS, BREACH OF FIDUCIARY, DUTY, VIOLATIONS OF OHIO SECURITIES ACT, FRAUD, NEGLIGENCE, BREACH OF CONTRACT, AND FINRA RULE VIOLATIONS.

**Product Type:** Direct Investment-DPP & LP Interests

**Alleged Damages:** \$2,490,000.00

### Arbitration Information

**Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):** FINRA

**Docket/Case #:** 10-00016

**Date Notice/Process Served:** 01/14/2010

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 08/03/2011

**Monetary Compensation Amount:** \$800,478.26





**Individual Contribution Amount:** \$0.00

**Broker Statement** THE BROKER/DEALER HAS PARTIALLY SETTLED THIS MATTER (SETTLEMENT REACHED WITH 1 CLAIMANT). THE CLAIMS OF THE OTHER CLAIMANTS CONTINUE AT THIS TIME. 10/03/2011: THE PORTION OF THIS CLAIM RELATING TO MEDICAL CAPITAL WAS PART OF A GLOBAL SETTLEMENT BY SECURITIES AMERICA, INC. CLAIMS RELATING TO ADDITIONAL PRODUCTS CONTINUE AT THIS TIME. 01/12/2012: I WAS DISMISSED FROM THIS MATTER WITH PREJUDICE.

### Disclosure 13 of 13

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** SECURITIES AMERICA, INC

**Allegations:** CLIENT IS ALLEGING THAT THE TRUST WAS NOT AN ACCREDITED INVESTOR AND SHOULD NOT HAVE BEEN SOLD PROVIDENT SHALE. THEY ARE REQUESTING THAT THEY BE PAID BACK THE FEES RECEIVED BY SAI AND THE REPRESENTATIVE.

**Product Type:** Direct Investment-DPP & LP Interests

**Alleged Damages:** \$5,000.00

**Alleged Damages Amount Explanation (if amount not exact):** CLIENT DID NOT MAKE EXACT DOLLAR REQUEST; HOWEVER, SAI IS UNABLE TO MAKE A GOOD FAITH DETERMINATION THAT THE LOSSES ASSOCIATED WITH THE COMPLAINT WOULD BE LESS THAN \$5,000.

**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:** 09/28/2009

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 01/18/2012

**Settlement Amount:** \$27,597.70

**Individual Contribution Amount:** \$0.00

**Broker Statement** THIS CLAIM WAS PART OF A GLOBAL SETTLEMENT BY SECURITIES AMERICA, INC. MR. NAKHOODA WAS NOT ASKED TO, NOR DID HE, CONTRIBUTE TO THIS SETTLEMENT.



## End of Report

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