



## IAPD Report

# DENNIS DOMINGO CUMMINGS PEREZ

CRD# 2923607

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

Please contact FINRA with any concerns.



## IAPD Information About Representatives

IAPD offers information on all current-and many former representatives. Investors are strongly encouraged to use IAPD to check the background of representatives before deciding to conduct, or continue to conduct, business with them.

### What is included in a IAPD report?

IAPD reports for individual representatives include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards.

It is important to note that the information contained in an IAPD report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

### Where did this information come from?

The information contained in IAPD comes from the Investment Adviser Registration Depository (IARD) and FINRA's Central Registration Depository, or CRD, (see more on CRD below) and is a combination of:

- information the states require representatives and firms to submit as part of the registration and licensing process, and
- information that state regulators report regarding disciplinary actions or allegations against representatives.

### How current is this information?

Generally, representatives are required to update their professional and disciplinary information in IARD within 30 days.

### Need help interpreting this report?

For help understanding how to read this report, please consult NASAA's IAPD Tips page  
<http://www.nasaa.org/IAPD/IARReports.cfm>

### What if I want to check the background of an Individual Broker or Brokerage Firm?

To check the background of an Individual Broker or Brokerage firm, you can search for the firm or individual in IAPD. If your search is successful, click on the link provided to view the available licensing and registration information in FINRA's BrokerCheck website.

### Are there other resources I can use to check the background of investment professionals?

It is recommended that you learn as much as possible about an individual representative or Investment Adviser firm before deciding to work with them. Your state securities regulator can help you research individuals and certain firms doing business in your state. The contact information for state securities regulators can be found on the website of the North American Securities Administrators Association <http://www.nasaa.org>



## Report Summary

### DENNIS DOMINGO CUMMINGS PEREZ (CRD# 2923607)

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 **04/10/2025**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
<b>B</b>	POPULAR SECURITIES, LLC	CRD# 8096	09/09/2008
<b>IA</b>	POPULAR SECURITIES, LLC	CRD# 8096	02/24/2014

### QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **4** 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>IA</b>	POPULAR SECURITIES, INC.	8096	CABO ROJO, PR	08/09/2011 - 01/31/2012
<b>B</b>	BBVA SECURITIES OF PUERTO RICO, INC.	39615	PONCE, PR	01/02/2002 - 09/02/2008
<b>B</b>	SALOMON SMITH BARNEY INC.	7059	NEW YORK, NY	09/09/1997 - 12/20/2001

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
Regulatory Event	1
Customer Dispute	17



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

#### Employment 1 of 1

Firm Name: **POPULAR SECURITIES, LLC**  
Main Address: POPULAR CENTER, 208 PONCE DE LEON  
SUITE 1200  
HATO REY, PR 00918  
Firm ID#: 8096

Regulator	Registration	Status	Date
 FINRA	General Securities Representative	Approved	09/09/2008
 Florida	Agent	Approved	01/19/2016
 Pennsylvania	Agent	Approved	02/04/2021
 Puerto Rico	Agent	Approved	09/09/2008
 Puerto Rico	Investment Adviser Representative	Approved	02/24/2014
 Texas	Agent	Approved	09/19/2022
 Texas	Investment Adviser Representative	Restricted Approval	07/18/2022

#### Branch Office Locations

**POPULAR SECURITIES, LLC**  
CALLE SUAU #1  
MAYAGUEZ, PR 00680



## Qualifications

### PASSED INDUSTRY EXAMS

This section includes all industry exams that the representative has passed. Under limited circumstances, a representative may attain registration after receiving an exam waiver based on a combination of exams the representative has passed and qualifying work experience. Likewise a new exam requirement may be grandfathered based on a representative's specific qualifying work experience. Exam waivers and grandfathering are not included below.

**This individual has passed 0 principal/supervisory exams, 2 general industry/product exams, and 2 state securities law exams.**

#### Principal/Supervisory Exams

Exam	Category	Date
No information reported.		

#### General Industry/Product Exams

Exam	Category	Date
B Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
B General Securities Representative Examination (S7)	Series 7	09/08/1997

#### State Securities Law Exams

Exam	Category	Date
IA Uniform Investment Adviser Law Examination (S65)	Series 65	11/06/2000
B Uniform Securities Agent State Law Examination (S63)	Series 63	10/06/1997

### PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **0** professional designation(s).

No information reported.



## Registration & Employment History

### PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
IA	08/09/2011 - 01/31/2012	POPULAR SECURITIES, INC.	CRD# 8096	CABO ROJO, PR
B	01/02/2002 - 09/02/2008	BBVA SECURITIES OF PUERTO RICO, INC.	CRD# 39615	PONCE, PR
B	09/09/1997 - 12/20/2001	SALOMON SMITH BARNEY INC.	CRD# 7059	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
09/2008 - Present	POPULAR SECURITIES	SENIOR VICE PRESIDENT - INVESTMENTS	Y	MAYAGUEZ, PR, 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.

Asociacion Residentes Paseo Los Robles - (Director board member/Finance Consultant) -

1521 Epifanio Vidal ST

Mayaguez PR 00682 -

Hrs per month = 8 hours -

No compensation -

Non-investment related -

Nature of the business = Non Profit organization -

Start Date = 05/09/2019

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D Cummings, LLC (President) -

Box 3355

Mayaguez, PR 00681 -

Hours per month = 0-5 hours -

Compensation = Dividends -

Nature of Business = Inheritance asset protection -

Start Date = 10/2023



## Disclosure Summary

### Disclosure Information

#### What you should know about reported disclosure events:

##### (1) Certain thresholds must be met before an event is reported to IARD, for example:

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

##### (2) Disclosure events in IAPD reports come from different sources:

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

##### (3) There are different statuses and dispositions for disclosure events:

- A disclosure event may have a status of *pending*, *on appeal*, or *final*.
  - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
  - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
  - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
  - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
  - A "settled" matter generally represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
  - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

##### (4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.



## DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1
Customer Dispute	17

### Regulatory Event

This disclosure event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a federal regulator such as the Securities and Exchange Commission or the Commodities Futures Trading Commission, or a foreign financial regulatory body) for a violation of investment-related rules or regulations. This disclosure event may also include a revocation or suspension of an Investment Adviser Representative's authority to act as an attorney, accountant or federal contractor.

#### Disclosure 1 of 1

<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	FINRA
<b>Sanction(s) Sought:</b>	
<b>Date Initiated:</b>	06/16/2021
<b>Docket/Case Number:</b>	<a href="#">2020065347501</a>
<b>Employing firm when activity occurred which led to the regulatory action:</b>	Popular Securities, LLC
<b>Product Type:</b>	No Product
<b>Allegations:</b>	Without admitting or denying the findings, Cummings Perez consented to the sanctions and to the entry of findings that he instructed his sales assistant to use pre-signed, but otherwise blank, Letters of Authorization to effect transfers between customers' accounts. The findings stated that Cummings Perez instructed his sales assistant to make the transfers after receiving instructions from the customers, who authorized the transfers. The findings also stated that Cummings Perez caused the firm to create and maintain inaccurate books and records.
<b>Current Status:</b>	Final
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)



**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?**

**Resolution Date:** 06/16/2021

**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?**

**(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?**

**(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or**



**(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?**

**Sanction 1 of 1**

**Sanction Type:** Suspension

**Capacities Affected:** All capacities

**Duration:** 45 business days

**Start Date:** 07/19/2021

**End Date:** 09/20/2021

**Monetary Sanction 1 of 1**

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

**Total Amount:** \$5,000.00

**Portion Levied against individual:** \$5,000.00

**Payment Plan:**

**Is Payment Plan Current:**

**Date Paid by individual:** 07/01/2021

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

**Amount Waived:**

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**Reporting Source:** Individual

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:** Suspension

**Date Initiated:** 06/16/2021

**Docket/Case Number:** [2020065347501](#)

**Employing firm when activity occurred which led to the regulatory action:** Popular Securities, LLC



<b>Product Type:</b>	No Product
<b>Allegations:</b>	Without admitting or denying the findings, the Financial Consultant consented to the sanctions and to the entry of findings that he obtained a pre-signed but otherwise blank LOA from two customer. On seven occasions, he instructed his sales assistant to use the previously signed, but otherwise blank, LOAs to transfer funds between the customer's accounts after receiving instructions from the customers, who authorized the transfers.
<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>	06/16/2021
<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>	45 DAYS
<b>Start Date:</b>	07/19/2021
<b>End Date:</b>	09/20/2021
<b>Monetary Sanction 1 of 1</b>	
<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$5,000.00
<b>Portion Levied against individual:</b>	\$5,000.00
<b>Payment Plan:</b>	
<b>Is Payment Plan Current:</b>	No
<b>Date Paid by individual:</b>	
<b>Was any portion of penalty waived?</b>	No
<b>Amount Waived:</b>	



## Customer Dispute

This section provides information regarding a customer dispute that was reported to the Investment Adviser Registration Depository (IARD) by the Investment Adviser Representative (IAR), an investment adviser and/or securities firm, and/or a securities regulator. The event may include a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit that contains allegations of sales practice violations against the individual.

The customer dispute may be pending or may have resulted in a civil judgment, arbitration award, monetary settlement, closure without action, withdrawal, dismissal, denial, or other outcome.

### Disclosure 1 of 17

<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	Popular Securities LLC
<b>Allegations:</b>	Claimant alleges that Financial Consultant investment recommendations to purchase and to hold P.R. securities were unsuitable in light of the clients' risk tolerance. Claimants also allege that recommendations made by the Financial Consultant were particularly egregious in light of Puerto Rico's well known deteriorating financial condition.
<b>Product Type:</b>	Debt-Government Other: Closed End Funds
<b>Alleged Damages:</b>	\$755,000.00
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	No
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	Yes
<b>Arbitration/Reparation forum or court name and location:</b>	FINRA
<b>Docket/Case #:</b>	18-03235
<b>Filing date of arbitration/CFTC reparation or civil litigation:</b>	09/14/2018

## Customer Complaint Information

<b>Date Complaint Received:</b>	09/20/2018
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	03/28/2022
<b>Settlement Amount:</b>	\$47,500.00
<b>Individual Contribution Amount:</b>	\$0.00
<b>Broker Statement</b>	The Financial Consultant denies the allegations and intends to defend them vigorously.

### Disclosure 2 of 17

<b>Reporting Source:</b>	Individual
<b>Employing firm when</b>	Popular Securities, LLC

**activities occurred which led to the complaint:**

**Allegations:** Claimant alleged that Financial Consultant investment recommendations to purchase and to hold P.R. securities were unsuitable in light of the clients' risk tolerance. Claimants also alleged that recommendations made by the Financial Consultant were particularly egregious in light of Puerto Rico's well known deteriorating financial condition.

**Product Type:** Debt-Government  
Other: Closed end funds

**Alleged Damages:** \$7,000,000.00

**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 #:** 18-01260

**Filing date of arbitration/CFTC reparation or civil litigation:** 04/05/2018

**Customer Complaint Information**

**Date Complaint Received:** 04/09/2018

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 05/14/2020

**Settlement Amount:** \$145,000.00

**Individual Contribution Amount:** \$0.00

**Broker Statement** The Financial Consultant denies these allegations and intends to defend them vigorously.

**Disclosure 3 of 17**

**Reporting Source:** Individual

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

**Allegations:** Claimant alleges that Financial Consultant investment recommendations to purchase and to hold P.R. securities were unsuitable in light of the clients' risk tolerance. Claimants also allege that recommendations made by the Financial Consultant were particularly egregious in light of Puerto Rico's well known deteriorating financial condition.

**Product Type:** Debt-Government

**Alleged Damages:** \$1,200,000.00

**Is this an oral complaint?** No



<b>Is this a written complaint?</b>	No
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	Yes
<b>Arbitration/Reparation forum or court name and location:</b>	FINRA
<b>Docket/Case #:</b>	18-00391
<b>Filing date of arbitration/CFTC reparation or civil litigation:</b>	01/30/2018

### Customer Complaint Information

<b>Date Complaint Received:</b>	02/01/2018
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	06/08/2022
<b>Settlement Amount:</b>	\$115,000.00
<b>Individual Contribution Amount:</b>	\$0.00
<b>Broker Statement</b>	THE FINANCIAL CONSULTANT DENIES THE ALLEGATIONS AND INTENDS TO DEFEND THEM VIGOROUSLY.

### Disclosure 4 of 17

<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	POPULAR SECURITIES
<b>Allegations:</b>	Claimant alleged that Financial Consultant investment recommendations to purchase and to hold P.R. securities were unsuitable in light of the clients' risk tolerance. Claimants also alleged that recommendations made by the Financial Consultant were particularly egregious in light of Puerto Rico's well known deteriorating financial condition.
<b>Product Type:</b>	Debt-Government
<b>Alleged Damages:</b>	\$110,000.00
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	No
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	Yes
<b>Arbitration/Reparation forum or court name and location:</b>	FINRA
<b>Docket/Case #:</b>	17-03456
<b>Filing date of arbitration/CFTC reparation or civil litigation:</b>	12/22/2017

### Customer Complaint Information



<b>Date Complaint Received:</b>	12/27/2017
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	03/16/2020
<b>Settlement Amount:</b>	\$45,000.00
<b>Individual Contribution Amount:</b>	\$0.00
<b>Broker Statement</b>	The Financial Consultant denies these allegations and intends to defend them vigorously.

#### **Disclosure 5 of 17**

<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	Popular Securities, LLC
<b>Allegations:</b>	Claimant is a not-for-profit corporation offering its members discounted fees for bank accounts and related online banking services. The Coop operates as a PR credit union. The Coop has members who mostly are retirees and low income customers over age 60. The Coop allegedly adopted an "Investment Policy" requiring investment into "prudent investments," described as "high quality, investment grade bonds which preserved capital and were highly liquid." The investments were to be conservative, low-risk investments.

Claimant contends that Financial Consultant investment recommendations to invest in and hold PR municipal bonds resulted in an over concentrated and risky portfolio, which were unsuitable positions in light of the client's wish to preserve its capital. The advice allegedly is especially egregious because of the well-known deterioration of the Puerto Rican economy.

<b>Product Type:</b>	Debt-Government
<b>Alleged Damages:</b>	\$15,000,000.00
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	No
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	Yes
<b>Arbitration/Reparation forum or court name and location:</b>	FINRA

<b>Docket/Case #:</b>	17-02441
<b>Filing date of arbitration/CFTC reparation or civil litigation:</b>	09/13/2017

#### **Customer Complaint Information**

<b>Date Complaint Received:</b>	10/06/2017
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	09/30/2019



**Settlement Amount:** \$340,000.00

**Individual Contribution Amount:** \$0.00

**Broker Statement** The Financial Consultant denies the allegations and intends to defend them vigorously.

#### Disclosure 6 of 17

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** POPULAR SECURITIES, LLC

**Allegations:** CLAIMANTS ALLEGE THAT FINANCIAL CONSULTANT INVESTMENT RECOMMENDATIONS IN PR BONDS RESULTED IN AN OVER CONCENTRATED AND RISKY PORTFOLIO, WHICH WERE UNSUITABLE POSITIONS IN LIGHT OF THE CLIENT'S RISK TOLERANCE AND WISH TO PRESERVE HIS CAPITAL. CLAIMANTS ALSO ALLEGE THAT FINANCIAL CONSULTANT MADE FALSE AND MISLEADING REPRESENTATIONS REGARDING THE PRODUCTS RISKS.

**Product Type:** Other: CLOSED END FUNDS

**Alleged Damages:** \$50,000.00

**Alleged Damages Amount Explanation (if amount not exact):** NOT SPECIFIED. ALLEGED LOSS BETWEEN \$50,000-\$100,000

**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 #:** 14-03435

**Filing date of arbitration/CFTC reparation or civil litigation:** 11/06/2014

#### Customer Complaint Information

**Date Complaint Received:** 11/17/2014

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 07/01/2016

**Settlement Amount:** \$29,000.00

**Individual Contribution Amount:** \$0.00

#### Disclosure 7 of 17



<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	POPULAR SECURITIES LLC
<b>Allegations:</b>	CLAIMANTS ALLEGE THAT FINANCIAL CONSULTANT INVESTMENT RECOMMENDATIONS IN A PR CLOSED END FUNDS WAS UNSUITABLE OVER-CONCENTRATED AND AT RISK FOR SUBSTANTIAL LOSS. CLAIMANTS ALSO ALLEGE THAT HE WAS NOT WARNED ABOUT THE PORTFOLIO RISKS NOR THE INCREASING RISKS DURING 2013.
<b>Product Type:</b>	Other: CLOSED-END FUNDS
<b>Alleged Damages:</b>	\$100,000.00
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	No
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	Yes
<b>Arbitration/Reparation forum or court name and location:</b>	SAN JUAN, PUERTO RICO
<b>Docket/Case #:</b>	14-02684
<b>Filing date of arbitration/CFTC reparation or civil litigation:</b>	09/04/2014

### Customer Complaint Information

<b>Date Complaint Received:</b>	09/10/2014
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	02/15/2017
<b>Settlement Amount:</b>	\$20,000.00
<b>Individual Contribution Amount:</b>	\$0.00

### Disclosure 8 of 17

<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	BBVA SECURITIES
<b>Allegations:</b>	CLAIMANTS ALLEGE THAT FINANCIAL CONSULTANT INVESTMENT RECOMMENDATIONS TO PURCHASE SEVERAL CONVERTIBLE NOTES RESULTED IN A RISKY PORTFOLIO, WHICH WAS UNSUITABLE TO THE CUSTOMER IN LIGHT OF THEIR RISK TOLERANCE.
<b>Product Type:</b>	Other: STRUCTURE PRODUCT
<b>Alleged Damages:</b>	\$302,000.00
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	No



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

Yes

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

FINRA

**Docket/Case #:** 14-01318  
**Filing date of arbitration/CFTC reparation or civil litigation:** 04/22/2014

### Customer Complaint Information

**Date Complaint Received:** 06/02/2014  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:** 01/23/2017  
**Settlement Amount:** \$55,000.00  
**Individual Contribution Amount:** \$0.00

### Disclosure 9 of 17

**Reporting Source:** Individual  
**Employing firm when activities occurred which led to the complaint:** UBS FINANCIAL SERVICES OF PUERTO RICO AND POPULAR SECURITIES LLC.  
**Allegations:** CLAIMANTS ALLEGE THAT FINANCIAL CONSULTANT INVESTMENT RECOMMENDATIONS TO HOLD A PR BOND FUND, AFTER TRANSFERRING ACCOUNT FROM ANOTHER BROKERAGE FIRM RESULTED IN AN OVER CONCENTRATED AND RISKY PORTFOLIO, WHICH WERE UNSUITABLE POSITIONS IN LIGHT OF THE CLIENT'S RISK TOLERANCE.  
**Product Type:** Other: PR BOND FUNDS  
**Alleged Damages:** \$1,000,000.00  
**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 #:** 14-00925  
**Filing date of arbitration/CFTC reparation or civil litigation:** 03/25/2014

### Customer Complaint Information

**Date Complaint Received:** 04/07/2014  
**Complaint Pending?** No  
**Status:** Settled



**Status Date:** 10/19/2015

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

**Individual Contribution Amount:** \$0.00

#### Disclosure 10 of 17

**Reporting Source:** Individual

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

**Allegations:** REGISTERED REPRESENTATIVE DID NOT EXECUTE AN UNSOLICITED ORDER FROM THE CUSTOMER TO SELL CERTAIN COMMON STOCKS OF HIS INVESTMENT PORTFOLIO.

**Product Type:** Equity Listed (Common & Preferred Stock)

**Alleged Damages:** \$41,140.00

**Is this an oral complaint?** Yes

**Is this a written complaint?** No

**Is this an arbitration/CFTC reparation or civil litigation?** No

#### Customer Complaint Information

**Date Complaint Received:** 01/18/2012

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 02/21/2012

**Settlement Amount:** \$30,000.00

**Individual Contribution Amount:** \$30,000.00

#### Disclosure 11 of 17

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** BBVA SECURITIES OF PR

**Allegations:** [CUSTOMER'S] SON AND OWNER OF THE SAME ACCOUNT ALLEGES THAT AFTER OCTOBER 3, 2006 THAT HE MET WITH RR TO CLOSE THE ACCOUNT, RR PURCHASED PREF STOCK WITHOUT AUTHORIZATION LATER ON. THE PURCHASED OCCURRED A YEAR BEFORE IN NOV 2005.

**Product Type:** Equity Listed (Common & Preferred Stock)

**Alleged Damages:** \$44,000.00

**Alleged Damages Amount Explanation (if amount not exact):** FULL LOSS IN THE PREFERRED STOCK , ALTHOUGH CLIENT IS ASKING FOR SOMEHOW RETURN.

**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:** 07/08/2011

**Complaint Pending?** No

**Status:** Closed/No Action

**Status Date:** 07/31/2011

**Settlement Amount:**

**Individual Contribution Amount:**

**Firm Statement** [CUSTOMER] OPENED THE CURRENT ACCOUNT WITH HIS SON IN OCTOBER 2006 AND TRANSFERRED ALREADY THE WESTERN PREF STOCK FROM A PREVIOUS ACCOUNT. THEY SIGNED ALL DISCLOSURES ADVISING POSSIBLE PRINCIPAL LOSS. CLIENT RECEIVED OUR RESPONSE AND NO FURTHER COMPLAINTS.

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**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** BBVA SECURITIES OF PR

**Allegations:** [CUSTOMER'S] SON AND OWNER OF THE SAME ACCOUNT ALLEGES THAT AFTER OCTOBER 3, 2006 THAT HE MET WITH RR TO CLOSE THE ACCOUNT, RR PURCHASED PREF STOCK WITHOUT AUTHORIZATION LATER ON. THE PURCHASED OCCURRED A YEAR BEFORE IN NOV 2005.

**Product Type:** Equity Listed (Common & Preferred Stock)

**Alleged Damages:** \$44,000.00

**Alleged Damages Amount Explanation (if amount not exact):** FULL LOSS IN THE PREFERRED STOCK, ALTHOUGH CLIENT IS ASKING FOR SOMEHOW RETURN.

**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:** 07/15/2011

**Complaint Pending?** No

**Status:** Closed/No Action

**Status Date:** 05/28/2013

**Settlement Amount:**

**Individual Contribution Amount:**

**Disclosure 12 of 17**

<b>Reporting Source:</b>	Firm
<b>Employing firm when activities occurred which led to the complaint:</b>	BBVA SECURITIES OF PR
<b>Allegations:</b>	[CUSTOMER] (EX FATHER IN LAW) ALLEGES THAT THE PREFERRED PR BANK STOCKS PURCHASED BETWEEN 2004-2007 WERE UNSUITABLE. HE DOES NOT REMEMBER THEY WERE AUTHORIZED. DID NOT CLAIM AN SPECIFIC AMOUNT. CLIENT RECEIVED POWER TO REPRESENT [CUSTOMER], HIS MOTHER JUST NOW FEB 2011. REQUESTED LIQUIDATION OF INVESTMENTS, THE CHECK AND CONFIRMATIONS OF THE PURCHASES OF PREFERRED STOCK.
<b>Product Type:</b>	Equity Listed (Common & Preferred Stock)
<b>Alleged Damages:</b>	\$85,000.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	FIRM ESTIMATED THE UNREALIZED LOSSES ON THE 3 PREFERRED STOCKS.
<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>	03/09/2011
<b>Complaint Pending?</b>	No
<b>Status:</b>	Closed/No Action
<b>Status Date:</b>	03/18/2011
<b>Settlement Amount:</b>	
<b>Individual Contribution Amount:</b>	
<b>Firm Statement</b>	THE CLAIM IS BEING MADE BY HIS EX FATHER IN LAW OF THE REG REP. THE DIVORCED HAS NOT BEEN AMICABLE AND THEY ARE STILL FIGHTING. RR LEFT TO POPULAR SECURITIES IN AUG 2008, THIS COMPLAINT WAS FORWARDED. FIRM RESPONDED TO CLIENT AND NO FURTHER COMPLAINT WAS REC'D. CLIENT LIQUIDATED ACCOUNT 2011 AND CLOSED.

<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	BBVA SECURITIES
<b>Allegations:</b>	COMPLAINT SUBMITTED TO BBVA SECURITIES CONTAINING THE FOLLOWING ALLEGATIONS: "PREFERRED PR BANK STOCKS PURCHASED BETWEEN 2004-2007 WERE UNSUITABLE. HE DOES NOT REMEMBER THEY WERE AUTHORIZED. DID NOT CLAIM AN SPECIFIC AMOUNT. CLIENT RECIEVED POWER TO REPRESENT [CUSTOMER], HIS MOTHER JUST NOW



FEB 2011. REQUESTED LIQUIDATION OF INVESTMENTS, THE CHECK AND CONFIRMATIONS OF THE PURCHASES OF PREFERRED STOCK."

**Product Type:** Equity Listed (Common & Preferred Stock)

**Alleged Damages:** \$85,000.00

**Alleged Damages Amount Explanation (if amount not exact):** BBVA ESTIMATED THE UNREALIZED LOSSES ON THE 3 PREFERRED STOCKS.

**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:** 03/14/2011

**Complaint Pending?** No

**Status:** Closed/No Action

**Status Date:** 01/04/2013

**Settlement Amount:**

**Individual Contribution Amount:**

**Broker Statement** ACTUAL WRITTEN CUSTOMER COMPLAINT HAVE NOT BEEN RECEIVED BY POPULAR SECURITIES. FILING HAVE BEEN MADE RELYING ON THE DRP SUBMITTED BY PREVIOUS EMPLOYER.

### Disclosure 13 of 17

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** BBVA SECURITIES OF PR ,INC

**Allegations:** TO BBVA SECURITIES OF PR THE CUSTOMERS ONLY REQUESTED STATEMENTS AND CONFIRMS. BUT THEY COMPLAINT TO POPULAR SECURITIES WHERE THEY HAVE THEIR ACCOUNT NOW WITH THE SAME BROKER THAT THEY DID NOT WANT ANY RISKS, NOR KNEW ABOUT THE INVESTMENTS.

**Product Type:** Equity Listed (Common & Preferred Stock)

**Alleged Damages:** \$0.00

**Alleged Damages Amount Explanation (if amount not exact):** NO DAMAGE IS REQUESTED IN OUR LETTER BUT THE MARKET VALUE WAS AT \$34M WHEN THEY LEFT IN NOV 2008. AND THEY INVESTED \$50M. SHOULD BE \$16M APPROXIMATE THE TOTAL LOSS. BUT THIS WAS SINCE 2003.

**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:** 06/07/2010

**Complaint Pending?** No

**Status:** Closed/No Action

**Status Date:** 03/12/2012

**Settlement Amount:**

**Individual Contribution Amount:**

**Firm Statement** FIRM WILL SENT ALL CONFIRMS AND STATEMENTS TO CUSTOMER. CUSTOMER TRANSFER ACCOUNT TO POPULAR SECURITIES IN NOV 2008 WITH THE SAME BROKER. DON'T UNDERSTAND WHY NOW THEY DON'T KNOW ABOUT THEIR ACCOUNT.

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**Reporting Source:** Individual

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

**Allegations:** CLIENTS ALLEGE THAT FC INVEST THEIR MONIES ON INVESTMENTS THAT WERE NOT ALIGNED WITH THEIR OBJECTIVES, THAT AT ALL TIMES THEY ALLEGED WAS PRESERVATION OF CAPITAL. WHEN LAST INVESTMENT TOOK PLACE, ALLEGEDLY ON 2006 WHILE FINANCIAL CONSULTANT WAS AT BBVA SECURITIES, CLIENTS CLAIM THAT FC MADE REPRESENTATIONS TO THEM THAT THE INVESTMENT HAS CERTAIN PRINCIPAL GUARANTEE. THEY NOW CLAIM THAT THEY WERE NOT AWARE OF THE RISK. CLIENTS REQUEST REIMBURSEMENT OF THE PRINCIPAL INVESTED.

**Product Type:** Equity-OTC

**Alleged Damages:** \$25,000.00

**Alleged Damages Amount Explanation (if amount not exact):** CLIENT ALLEGED THAT THEY HAVE INVESTED INITIALLY \$50,000.00. CURRENT MARKET VALUE OF INVESTMENT IS AROUND \$25,000.00

**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:** 03/17/2010

**Complaint Pending?** No

**Status:** Closed/No Action

**Status Date:** 03/06/2012

**Settlement Amount:**

**Individual Contribution Amount:**

**Disclosure 14 of 17**

**Reporting Source:** Firm  
**Employing firm when activities occurred which led to the complaint:** BBVA SECURITIES OF PR  
**Allegations:** CLIENT ALLEGES THAT WHEN HE INVESTED IN 2004 , HE THOUGHT HE WAS NOT GOING TO LOSE ANY PRINCIPAL AND WAS GUARANTEED. HE RETIRED A BANK CD FOR \$200,000 THAT HE COULD HAVE INVESTED WITH HIS INSURANCE BROKER NESTOR TORRES IN A FIXED ANNUITY. WHERE HE HAS NEVER LOSE MONEY. HE WAS MISLEAD.  
**Product Type:** Equity Listed (Common & Preferred Stock)  
Mutual Fund  
**Alleged Damages:** \$73,000.00  
**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:** 07/14/2009  
**Complaint Pending?** No  
**Status:** Closed/No Action  
**Status Date:** 10/14/2010  
**Settlement Amount:**  
**Individual Contribution Amount:**  
**Firm Statement** CLIENT LIQUIDATED SECURITIES ON OCT 14, 2010. ACCOUNT CLOSED ON APRIL 2011.

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**Reporting Source:** Individual  
**Employing firm when activities occurred which led to the complaint:** BBVA SECURITIES OF PR  
**Allegations:** CLIENT ALLEGES THAT WHEN HE INVESTED IN 2004 , HE THOUGHT HE WAS NOT GOING TO LOSE ANY PRINCIPAL AND WAS GUARANTEED. HE RETIRED A BANK CD FOR \$200,000 THAT HE COULD HAVE INVESTED WITH HIS INSURANCE BROKER NESTOR TORRES IN A FIXED ANNUITY. WHERE HE HAS NEVER LOSE MONEY. HE WAS MISLEAD.  
**Product Type:** Equity Listed (Common & Preferred Stock)  
Mutual Fund  
**Alleged Damages:** \$73,000.00  
**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:** 07/14/2009

**Complaint Pending?** No

**Status:** Closed/No Action

**Status Date:** 11/04/2011

**Settlement Amount:**

**Individual Contribution Amount:**

**Broker Statement**

THE FIRM WILL MEET WITH CUSTOMER NEXT WEEK WHEN THE RR RESPONDS TO THE COMPLAINT. THE FIRM REVIEWED THE FILE AND THERE WAS IN ENGLISH AND SPANISH THE NON FDIC INVESTMENT PRODUCT DISCLOSURE WHERE IT INDICATES YOU MAY LOSE YOUR PRINCIPAL, DULY SIGN BY BOTH SPOUSES. MEANWHILE ALL PROSPECTUSES HAVE BEEN RESENT. CUSTOMER PROFILE INDICATES HE HAD 7 YEARS OF EXPERIENCE IN INVES

## Disclosure 15 of 17

**Reporting Source:** Firm

**Employing firm when activities occurred which led to the complaint:** BBVA SECURITIES OF PR, INC

**Allegations:** LAWYER ALLEGES CLIENT WAS INCAPACITATED AND THE 3 TYPE OF PRODUCT SOLD WERE UNSUITABLE.

**Product Type:** Debt-Corporate  
Equity Listed (Common & Preferred Stock)

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

**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 #:** 09-06088

**Filing date of arbitration/CFTC reparation or civil litigation:** 11/04/2009

## Customer Complaint Information

**Date Complaint Received:** 11/10/2009

**Complaint Pending?** No

**Status:** Evolved into Arbitration/CFTC reparation (the individual is a named party)

**Status Date:** 11/10/2009

**Settlement Amount:**

**Individual Contribution**

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

FINRA

**Docket/Case #:** 09-06088**Date Notice/Process Served:** 11/10/2009**Arbitration Pending?** No**Disposition:** Settled**Disposition Date:** 09/10/2010**Monetary Compensation Amount:** \$82,000.00**Individual Contribution Amount:** \$0.00**Firm Statement**  
LAWYER [ATTORNEY] SENT A LETTER ON BEHALF OF HIS CLIENTS. INDICATING THE ABOVE PRODUCTS WERE UNSUITABLE FOR HIS CLIENTS BECAUSE ONE OF THEM WAS INCAPACITATED. WE CALLED [CUSTOMER], THE CLIENT AND SHE DID NOT KNOW THE LAWYER. THE FIRM SENT A LETTER FOR HER AUTHORIZATION THE SAME DAY IF SHE WANTED TO PROCEED. THE FIRM RECEIVED AN AUTHORIZATION TO CONTINUE WITH LAWYER. THE FIRM REQUESTED DENNIS CUMMINGS A RESPONSE TO THE COMPLAINT WHOIS NOW IN POPULAR SECURITIES. CUMMINGS DENIES ALLEGATIONS. THE CLIENTS WERE VISITED IN THEIR HOMES AFTER MR. CUMMINGS LEFT AND THE INCAPACITATED ONE HAD A NEW RED LEXUS. BOTH SPOUSES CAME TO VISIT THE FIRM ON SEPTEMBER 2008 BECAUSE THEY WERE NOT LEAVING WITH DENNIS TO POPULAR BECAUSE THEY DID NOT LIKE POPULAR. THEY WANTED AN ANALYSIS OF THE MARGIN BALANCE WHICH RESULTED THAT A CHECK WAS ISSUED TO DEPT OF TREASURY AND WAS VERY HAPPY WITH HIS HIMA SHARES AND WANTED TO BUY MORE. NONE LOOKED INCAPACITATED. INVESTIGATION WILL CONTINUE.**Reporting Source:** Individual**Employing firm when activities occurred which led to the complaint:** BBVA SECURITIES OF PR, INC**Allegations:** LAWYER ALLEGES CLIENT WAS INCAPACITATED AND THE 3 TYPE OF PRODUCT SOLD WERE UNSUITABLE.**Product Type:** Debt-Corporate  
Equity Listed (Common & Preferred Stock)**Alleged Damages:** \$300,000.00**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 #:** 09-06088

**Filing date of arbitration/CFTC reparation or civil litigation:** 11/04/2009

### Customer Complaint Information

**Date Complaint Received:** 11/10/2009

**Complaint Pending?** No

**Status:** Evolved into Arbitration/CFTC reparation (the individual is a named party)

**Status Date:** 11/24/2009

**Settlement Amount:**

**Individual Contribution Amount:**

### Arbitration Information

**Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):** NOVEMBER 4, 2009

**Docket/Case #:** 09-06088

**Date Notice/Process Served:** 11/10/2009

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 03/14/2011

**Monetary Compensation Amount:** \$82,000.00

**Individual Contribution Amount:** \$0.00

### Broker Statement

LAWYER [ATTORNEY] SENT A LETTER ON BEHALF OF HIS CLIENTS. INDICATING THE ABOVE PRODUCTS WERE UNSUITABLE FOR HIS CLIENTS BECAUSE ONE OF THEM WAS INCAPACITATED. BBVA CALLED [CUSTOMER], THE CLIENT AND SHE DID NOT KNOW THE LAWYER. THE FIRM SENT A LETTER FOR HER AUTHORIZATION THE SAME DAY IF SHE WANTED TO PROCEED. THE FIRM RECEIVED AN AUTHORIZATION TO CONTINUE WITH LAWYER. THE FIRM REQUESTED DENNIS CUMMINGS A RESPONSE TO THE COMPLAINT WHOIS NOW IN POPULAR SECURITIES. CUMMINGS DENIES ALLEGATIONS. THE CLIENTS WERE VISITED IN THEIR HOMES AFTER MR. CUMMINGS LEFT AND THE INCAPACITATED ONE HAD A NEW RED LEXUS. BOTH SPOUSES CAME TO VISIT THE FIRM ON SEPTEMBER 2008 BECAUSE THEY WERE NOT LEAVING WITH DENNIS TO POPULAR BECAUSE THEY DID NOT LIKE POPULAR. THEY WANTED AN ANALYSIS OF THE MARGIN BALANCE WHICH RESULTED THAT A CHECK WAS ISSUED TO DEPT OF TREASURY AND WAS VERY HAPPY WITH HIS HIMA SHARES AND WANTED TO BUY MORE. NONE LOOKED INCAPACITATED. INVESTIGATION WILL CONTINUE.

### Disclosure 16 of 17

**Reporting Source:** Firm



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

BBVA SECURITIES OF PR

**Allegations:**

CLIENT INVESTED IN WESTERNBANK PREFERRED STOCK IN THE AMOUNT OF \$24,645.29 WITH HIS BROKER , DENNIS CUMMINGS. DENNIS PROVIDED A LETTER TO CLIENT INDICATING THAT THE STOCK HAD A MATURITY SCHEDULED IN 2008. THIS WAS NOT SENT TO THE HEAD OFFICE AND WAS NOT FOUND IN ANY FILES FOR THIS CUSTOMER IN THE FIRM, IN VIOLATION OF THE RULES AND PROCEDURES REQUIRING FIRM PRINCIPAL APPROVAL FOR ALL CORRESPONDENCE. THE FIRM SENT TO DENNIS CUMMINGS, WHO IS NOW IN POPULAR SECURITIES, THE LETTER AND COMPLAINT FOR HIS COMMENT. MR.CUMMINGS DID NOT REPLIED IN 1 WEEK. THE FIRM WILL REVIEW THE ACCOUNT WITH CUSTOMER AND OTHER DETAILS.

CLIENT INVESTED IN WESTERNBANK PREFERRED STOCK IN THE AMOUNT OF \$24,645.29 WITH HIS BROKER , DENNIS CUMMINGS. DENNIS PROVIDED A LETTER TO CLIENT INDICATING THAT THE STOCK HAD A MATURITY SCHEDULED IN 2008. THIS WAS NOT SENT TO THE HEAD OFFICE AND WAS NOT FOUND IN ANY FILES FOR THIS CUSTOMER IN THE FIRM, IN VIOLATION OF THE RULES AND PROCEDURES REQUIRING FIRM PRINCIPAL APPROVAL FOR ALL CORRESPONDENCE. THE FIRM SENT TO DENNIS CUMMINGS, WHO IS NOW IN POPULAR SECURITIES, THE LETTER AND COMPLAINT FOR HIS COMMENT. MR.CUMMINGS DID NOT REPLIED IN 1 WEEK. THE FIRM WILL REVIEW THE ACCOUNT WITH CUSTOMER AND OTHER DETAILS.

**Product Type:** Equity-OTC

**Alleged Damages:** \$22,500.00

**Alleged Damages Amount Explanation (if amount not exact):** APROXIMATELY DUE TO MARKET VALUE ON SHARES ON HAND.

**Is this an oral complaint?** No

**Is this a written complaint?** Yes

**Is this an arbitration/CFTC reparation or civil litigation?** No

## Customer Complaint Information

**Date Complaint Received:** 04/15/2009

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 05/29/2009

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

**Individual Contribution Amount:** \$20,000.00

**Firm Statement** DENNIS PROVIDED A LETTER TO CLIENT INDICATING THAT THE STOCK HAD A MATURITY SCHEDULED IN 2008. THIS LETTER WAS NOT SENT TO THE HEAD OFFICE AND WAS NOT FOUND IN ANY FILES FOR THIS CUSTOMER IN THE FIRM, IN VIOLATION OF THE RULES AND PROCEDURES REQUIRING FIRM PRINCIPAL APPROVAL FOR ALL CORRESPONDENCE. IN ADDITIONA AN EMAILS WAS SENT TO CUSTOMER BY ASSISTANT ON



BEHALF OF MR. CUMMINGS REINFORCING MATURITY AND RETURN OF PRINCIPAL. THE FIRM SENT TO MR. CUMMINGS ALL COMMUNICATIONS. AFTER 3 WEEKS OF VAGUE RESPONSES, HE SAID IT WAS NOT HIS SIGNATURE. THERE IS NO EVIDENCE THAT HE GAVE THE PROSPECTUS NOR ANY OTHER WRITTEN EVIDENCE TO THE CONTRARY OF THE WRITTEN COMMUNICATIONS WITH THE CUSTOMER. WITH SUCH A WEAK CASE, THE BROKER HAS BEEN ADVISED HE WILL HAVE TO PAY FOR SETTLEMENT.

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<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	BBVA SECURITIES OF PR
<b>Allegations:</b>	CLIENT INVESTED IN WESTERNBANK PREFERRED STOCK IN THE AMOUNT OF \$24,645.29 WITH HIS BROKER, DENNIS CUMMINGS. DENNIS PROVIDED A LETTER TO CLIENT INDICATING THAT THE STOCK HAD A MATURITY SCHEDULED IN 2008. THIS WAS NOT SENT TO THE HEAD OFFICE AND WAS NOT FOUND IN ANY FILES FOR THIS CUSTOMER IN THE FIRM, IN VIOLATION OF THE RULES AND PROCEDURES REQUIRING FIRM PRINCIPAL APPROVAL FOR ALL CORRESPONDENCE. THE FIRM SENT TO DENNIS CUMMINGS, WHO IS NOW IN POPULAR SECURITIES, THE LETTER AND COMPLAINT FOR HIS COMMENT. MR. CUMMINGS DID NOT REPLIED IN 1 WEEK. THE FIRM WILL REVIEW THE ACCOUNT WITH CUSTOMER AND OTHER DETAILS.
<b>Product Type:</b>	Equity-OTC
<b>Alleged Damages:</b>	\$22,500.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	APROXIMATELY DUE TO MARKET VALUE ON SHARES ON HAND
<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>	04/15/2009
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	05/29/2009
<b>Settlement Amount:</b>	\$20,000.00
<b>Individual Contribution Amount:</b>	\$20,000.00

### Disclosure 17 of 17

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

BBVA SECURITIES OF PR

**Allegations:**

CLIENT ALLEGED THAT THE INSTITUTION NEVER HAD THE INTENTION TO BUY SHARES OF ANY INSTITUTION. NOTED THEY WERE A NONPROFIT ORGANIZATION. UNDERSTOOD THEY WOULD RECEIVED THEIR PRINCIPAL AT MATURITY

**Product Type:**

Debt-Corporate

**Alleged Damages:**

\$35,000.00

**Alleged Damages Amount Explanation (if amount not exact):**

9/17/2007 COMPLAINT REPORTED BUT NOW ARCHIVED.

**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:** 09/17/2007

**Complaint Pending?**

No

**Status:**

Settled

**Status Date:** 09/01/2010

**Settlement Amount:** \$55,000.00

**Individual Contribution Amount:** \$0.00

**Firm Statement**

SETTLEMENT PAYMENT WAS MADE ON SEPTEMBER 1, 2010. INITIAL COMPLAINT WAS IN 2007 AND HAD BEEN ARCHIVED. CUSTOMER HAD KEPT THE POPULAR STOCK.

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**Reporting Source:**

Individual

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

BBVA SECURITIES OF PR, INC

**Allegations:**

CLIENT ALLEGES THAT THE INSTITUTION NEVER HAD THE INTENTION TO BUY SHARES OF ANY INSTITUTION. AND NOTED THAT THEY ARE A NONPROFIT ORGANIZATION AND CANNOT INVEST IN RISKY INSTRUMENTS. THE INSTITUTION UNDERSTOOD THAT AT MATURITY THEY WOULD RECEIVED THEIR PRINCIPAL OF #100M. THEY ARE CLAIMING THE TOTAL \$100M.

**Product Type:**

Debt-Corporate

**Alleged Damages:**

\$35,000.00

**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:** 09/17/2007

**Complaint Pending?** No

**Status:** Settled

**Status Date:** 03/31/2011

**Settlement Amount:** \$55,000.00

**Individual Contribution  
Amount:** \$0.00

**Broker Statement** PREVIOUS EMPLOYER SUBMITTED THE FOLLOWING COMMENTS:  
"SETTLEMENT PAYMENT WAS MADE ON SEPTEMBER 1, 2010. INITIAL  
COMPLAINT WAS IN 2007 AND HAD BEEN ARCHIVED. CUSTOMER HAD  
KEPT THE POPULAR STOCK".



## End of Report

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