



IAPD Report

JEFFREY THOMAS PUGLIA

CRD# 2926402

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Qualifications	2 - 3
Registration and Employment History	4 - 5
Disclosure Information	6



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

JEFFREY THOMAS PUGLIA (CRD# 2926402)

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 **10/30/2023**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	BDFS CAPITAL LLC	CRD# 287680	07/24/2017

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **1** 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	M. S. HOWELLS & CO.	104100	MILFORD, DE	07/17/2017 - 12/31/2017
B	LPL FINANCIAL LLC	6413	MILFORD, DE	10/17/2008 - 07/25/2017
IA	LPL FINANCIAL LLC	6413	MILFORD, DE	10/17/2008 - 07/25/2017

For additional registration and employment history details as reported by the individual, refer to the Registration and Employment History section of the Detailed Report.

DISCLOSURE INFORMATION

Disclosure events include certain criminal charges and convictions, formal investigations and disciplinary actions initiated by regulators, customer disputes and arbitrations, and financial disclosures such as bankruptcies and unpaid judgments or liens.

Are there events disclosed about this representative?

Yes

The following types of events are disclosed about this representative:

Type	Count
Termination	1



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 **1** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **BDFS CAPITAL LLC**
Main Address: 19409 PLANTATION RD
BLDG. 2 UNIT 1
REHOBOTH BEACH, DE 19971
Firm ID#: 287680

	Regulator	Registration	Status	Date
	Delaware	Investment Adviser Representative	Approved	07/24/2017

Branch Office Locations

BDFS CAPITAL LLC
19409 PLANTATION RD
BLDG. 2 UNIT 1
REHOBOTH BEACH, DE 19971



Qualifications



PASSED INDUSTRY EXAMS

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

This individual has passed 0 principal/supervisory exams, 3 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
------	----------	------

No information reported.

General Industry/Product Exams

Exam	Category	Date
B Securities Industry Essentials Examination (SIE)	SIE	12/31/2017
B Futures Managed Funds Examination (S31)	Series 31	04/16/2003
B General Securities Representative Examination (S7)	Series 7	08/19/1997

State Securities Law Exams

Exam	Category	Date
IA Uniform Investment Adviser Law Examination (S65)	Series 65	09/04/1997
B Uniform Securities Agent State Law Examination (S63)	Series 63	08/26/1997



PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **1** professional designation(s).

Certified Financial Planner

This representative holds or did hold **1** professional designation(s) that may have been used to qualify as an Investment Advisor representative. Please check with the appropriate designation authority for verification that the designation is still in effect. The contact information for these professional designation authorities can be found on the website for the North American Securities Administrators Association at <http://www.nasaa.org>



Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
B	07/17/2017 - 12/31/2017	M. S. HOWELLS & CO.	CRD# 104100	MILFORD, DE
B	10/17/2008 - 07/25/2017	LPL FINANCIAL LLC	CRD# 6413	MILFORD, DE
IA	10/17/2008 - 07/25/2017	LPL FINANCIAL LLC	CRD# 6413	MILFORD, DE
B	09/28/2005 - 10/21/2008	PNC INVESTMENTS	CRD# 129052	REHOBOTH, DE
IA	09/28/2005 - 10/21/2008	PNC INVESTMENTS	CRD# 129052	REHOBOTH, DE
IA	03/09/2001 - 10/04/2005	MORGAN STANLEY	CRD# 7556	LEWES, DE
B	01/29/2001 - 10/04/2005	MORGAN STANLEY DW INC.	CRD# 7556	PURCHASE, NY
B	06/03/1998 - 02/15/2001	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	NEW YORK, NY
B	08/20/1997 - 01/12/1999	DEAN WITTER REYNOLDS INC.	CRD# 7556	PURCHASE, NY

EMPLOYMENT HISTORY

Below is the representative's employment history for up to the last 10 years.

Employment Dates	Employer Name	Position	Investment Related	Employer Location
07/2017 - Present	BLACK DIAMOND FINANCIAL SOLUTIONS	REGISTERED INVESTMENT ADVISOR	Y	MILFORD, DE, United States
07/2017 - 12/2017	MS HOWELLS & CO	REGISTERED REP	Y	SCOTTSDALE, AZ, United States
10/2008 - 07/2017	LPL FINANCIAL	REGISTERED REPRESENTATIVE	Y	MILFORD, DE, United States



Registration & Employment History



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) 03/16/2010 - DBA ONLY, BLACK DIAMOND FINANCIAL SOLUTIONS, INC.
- 2) 10/16/2012: RLQ PROPERTIES LLC/ REAL ESTATE RENTAL / TIME SPENT 1% /MILFORD, DE
- 3) 07/17/2017 - BDFS Capital LLC, RIA Time Spent 60%, Milford, DE
- 4) 12/20/2018 - BDFS Insurance Services LLC (Legal name of Buisness: Black Diamond Financial Solution) President, insurance company or agency, investment related: Yes, 223A S. Rehoboth Blvd.; Milford, DE 19963, Insurance Sales and oversight of Agency, Hours devoted to business during trading hours: 10;Percentage of total yearly compensation expected to be derived from the business: 10;
- 5) 06/11/2018 - Jiggy's Farms; President; investment related: No, Milford, DE, Produce all natural soil amendment and sales to farmers and gardeners; oversee operations; Hours devoted to business during trading hours: 0; Hours devoted to business outside trading hours: 12; Percentage of total yearly compensation expected to be derived from the business: 0;
- 6) 04/02/2015 - Friends of Milford Museum; Treasurer; investment related: No, Milford, DE, Board of Directors for Museum; Prepare monthly Expense & Income report. Write checks for museum expenses & deposit income from donations & events. Prepare payroll for employees; Hours devoted to business during trading hours: 0; Hours devoted to business outside trading hours: 3; Percentage of total yearly compensation expected to be derived from the business: 0;

Jeffrey Thomas Puglia is a registered representative of LPL Financial and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. BCL always acts in the best interest of the client, including with respect to the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of BCL in such individual's capacity as a registered representative.



Disclosure Summary

Disclosure Information

What you should know about reported disclosure events:

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

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

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

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

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

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

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



DISCLOSURE EVENT DETAILS

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

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

The following types of events are disclosed about this representative:

Type	Count
Termination	1

Termination

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

Disclosure 1 of 1

Reporting Source:	Individual
Firm Name:	MERRILL LYNCH, PIERCE, FENNER & SMITH INC.
Termination Type:	Discharged
Termination Date:	01/17/2001
Allegations:	MR. PUGLIA WAS TRMINATED ON JANUARY 17, 2001, AFTER THE FIRM LEARNED THAT HE VIOLATED FIRM PROCEDURES IN REGARDS TO THE LIQUIDATION OF MUTUAL FUNDS.
Product Type:	Mutual Fund(s)
Other Product Types:	
Broker Statement	MARCH 2000, BOUGHT GROWTH FUNDS FOR CLIENT'S ACCOUNT. SOLD FUNDS FALL OF 2000, DUE TO THE ALGER FUND HAD A SIGNIFICANT AMOUNT OF INTERNET HOLDINGS WHICH WOULD NOT EXPECT PROFITS IN THE NEAR FUTURE. CLIENT WAS UNREACHABLE DUE TO BEING OUT OF THE COUNTRY.



End of Report

This page is intentionally left blank.