



IAPD Report

RAFAEL ENRIQUE KODESH ALEGRIA

CRD# 2960042

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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

RAFAEL ENRIQUE KODESH ALEGRIA (CRD# 2960042)

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 **08/28/2023**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	ORIENTAL FINANCIAL SERVICES LLC	CRD# 29753	11/28/1997
IA	ORIENTAL FINANCIAL SERVICES LLC	CRD# 29753	02/10/2021

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
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No information reported.

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

Employment 1 of 1

Firm Name: **ORIENTAL FINANCIAL SERVICES LLC**
Main Address: 270 MUNOZ RIVERA AVE
SUITE MEZZANINE
SAN JUAN, PR 00918
Firm ID#: 29753

	Regulator	Registration	Status	Date
B	FINRA	General Securities Representative	Approved	11/28/1997
B	Florida	Agent	Approved	01/29/2014
B	Georgia	Agent	Approved	09/20/2021
B	New Jersey	Agent	Approved	01/29/2014
B	Puerto Rico	Agent	Approved	11/28/1997
IA	Puerto Rico	Investment Adviser Representative	Approved	02/10/2021

Branch Office Locations

ORIENTAL FINANCIAL SERVICES LLC
254 MUNOZ RIVERA AVE
11TH FLOOR
SAN JUAN, PR 00918

ORIENTAL FINANCIAL SERVICES LLC
AVE. GONZALEZ GUISTI
CORNER EBANO STREET
GUAYNABO, PR 00968



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 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 Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
B General Securities Representative Examination (S7)	Series 7	11/26/1997

State Securities Law Exams

Exam	Category	Date
IA B Uniform Combined State Law Examination (S66)	Series 66	01/29/2021



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:

No information reported.

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
07/1997 - Present	ORIENTAL FINANCIAL SERVICES CORP.	INVESTMENT ADVISOR	Y	SAN JUAN, 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.

- 1)JBK HORSE RACING COMPANY- OWNER AND GENERAL MANAGER. NON INVESTMENT RELATED BUSINESS, STARTED IN NOV 2013. 5 HOURS A WEEK. OVERSEE HORSES AND HORSES' RACES.
- 2)KOCO LLC ,owns real estate holding company. Rental building.
- 3)Invest \$50k for 2.5% of LULA PUERTO RICO INVESTORS LLC. Provide seed money for start ups. Related LULA rides in Boston. No time to be devoted.
- 4)Insurance agent of Oriental Insurance LLC (OIN), OFS affiliate. Sales of life, fixed and variable annuities as part of the product offerings to clients for diversification. All commissions are known to OFS and same payout grid as other OFS products. One to two hours a week. Marketing material provided by OIN and insurance companies.
- 5)President BOD of JBK Foundation, non profit, raises funds for Education and other needs of the Puerto Rico community. Quarterly meeting.
- 6) Member of BOD of CPN, school in PR. Quarterly meetings.
- 7) President & 50% owner KOFU LLC, real estate development company. No compensation at this point. Just incorporated.
- 8)PRHOA PR HORSE OWNER ASSOCIATION- BOARD MEMBER



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
Customer Dispute	13

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

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	ORIENTAL FINANCIAL SERVICES
Allegations:	PERIOD 2010-2016. Alleges Reckless recommendation and unsuitable concentration in PR bonds, PR CEF and PR open end funds. Breach of fid duty, fraud, breach of contract. Claim damages \$1-5mm
Product Type:	Debt-Municipal Other: PUERTO RICO CLOSED END AND OPEN END FUNDS
Alleged Damages:	\$2,500,000.00
Alleged Damages Amount Explanation (if amount not exact):	Damages between \$1,000,000 to \$5,000,000. calculated mid point.
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 #:	19--01387
Filing date of arbitration/CFTC reparation or civil litigation:	05/16/2019



Customer Complaint Information

Date Complaint Received: 05/17/2019
Complaint Pending? No
Status: Settled
Status Date: 12/14/2020
Settlement Amount: \$140,000.00
Individual Contribution Amount: \$0.00

Disclosure 2 of 13

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: ORIENTAL FINANCIAL SERVICES
Allegations: PERIOD 2012-2016. Alleges Reckless recommendation and unsuitable concentration in PR bonds, PR CEF and PR open end funds. Breach of fid duty, fraud, breach of contract.
Product Type: Debt-Municipal
Other: PR CLOSED END AND PR OPEN END FUNDS
Alleged Damages: \$5,000,000.00
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 #: 19-01388
Filing date of arbitration/CFTC reparation or civil litigation: 05/16/2019

Customer Complaint Information

Date Complaint Received: 05/17/2019
Complaint Pending? No
Status: Settled
Status Date: 01/18/2023
Settlement Amount: \$185,000.00
Individual Contribution Amount: \$0.00

Disclosure 3 of 13

Reporting Source: Individual



Employing firm when activities occurred which led to the complaint:

ORIENTAL FINANCIAL SERVICES

Allegations:

PERIOD 2009-2014. Alleges misrepresentations and omissions, breach of fid duty, breach of contract, unsuitable investment recommendations, failure to supervise, fraud, negligence

Product Type:

Debt-Municipal
Other: PUERTO RICO CLOSED END FUNDS

Alleged Damages:

\$250,000.00

Alleged Damages Amount Explanation (if amount not exact):

DAMAGES BETWEEN \$100,000 AND \$500,000.

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 #:

19-00946

Filing date of arbitration/CFTC reparation or civil litigation:

04/05/2019

Customer Complaint Information

Date Complaint Received:

04/05/2019

Complaint Pending?

No

Status:

Settled

Status Date:

08/08/2022

Settlement Amount:

\$60,000.00

Individual Contribution Amount:

\$0.00

Disclosure 4 of 13

Reporting Source:

Individual

Employing firm when activities occurred which led to the complaint:

ORIENTAL FINANCIAL SERVICES

Allegations:

PERIOD 2003-2014. Misrepresentations and omissions, breach of fid duty, breach of contract, unsuitable investment recommendations, fraud, negligence

Product Type:

Debt-Municipal
Other: PR OPEND END FUNDS

Alleged Damages:

\$315,000.00

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 #: 19-00224

Filing date of arbitration/CFTC reparation or civil litigation: 01/16/2019

Customer Complaint Information

Date Complaint Received: 01/17/2019

Complaint Pending? No

Status: Settled

Status Date: 08/08/2022

Settlement Amount: \$45,000.00

Individual Contribution Amount: \$0.00

Disclosure 5 of 13

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: ORIENTAL FINANCIAL SERVICES

Allegations: PERIOD 2008-2013. ALLEGES Misrepresentation,inappropriate and concentrated investment strategy constiute fraud,breach of fid duty,negligence in deceased mother's acct.

Product Type: Debt-Municipal
Other: PR CEF

Alleged Damages: \$401,000.00

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 #: 18-03124

Filing date of arbitration/CFTC reparation or civil litigation: 09/04/2018

Customer Complaint Information

Date Complaint Received: 09/05/2018

Complaint Pending? No

Status: Settled



Status Date: 10/28/2020

Settlement Amount: \$185,000.00

Individual Contribution Amount: \$0.00

Broker Statement [REDACTED]HAD A POWER OF ATTORNEY IN MOTHER'S ACCT.

Disclosure 6 of 13

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: ORIENTAL FINANCIAL SERVICES

Allegations: PERIOD PURCHASES 1996-2012. Alleges negligent, unsuitable recommendations, misrepresentation, failure to supervise, concentration, unauthorized, breach of contract. Includes ORIENTAL BANK AND TRUST with responsibility.

Product Type: Debt-Municipal
Other: PR CEF AND PR OPEN END FUNDS

Alleged Damages: \$4,414,521.55

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 #: 18-03053

Filing date of arbitration/CFTC reparation or civil litigation: 08/28/2018

Customer Complaint Information

Date Complaint Received: 08/30/2018

Complaint Pending? No

Status: Settled

Status Date: 08/01/2023

Settlement Amount: \$80,000.00

Individual Contribution Amount: \$0.00

Disclosure 7 of 13

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: ORIENTAL FINANCIAL SERVICES

Allegations: PERIOD 7/22/2013. ALLEGES RECKLESS AND UNSUITABLE



CONCENTRATION IN PR BONDS, BREACH OF FID DUTY, BREACH OF CONTRACT, NEGLIGENCE, FRAUD.

Product Type: Debt-Municipal

Alleged Damages: \$250,000.00

Alleged Damages Amount Explanation (if amount not exact): CLAIM INDICATES DAMAGES BETWEEN \$100,000 TO \$500,000 BUT NO FINAL REQUEST ON AWARD SOUGHT. INPUT MID VALUE. UNREALIZED LOSSES APPROX \$81,000 WITHOUT NETTING INTEREST.

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 #: 18-02785

Filing date of arbitration/CFTC reparation or civil litigation: 08/07/2018

Customer Complaint Information

Date Complaint Received: 08/08/2018

Complaint Pending? No

Status: Settled

Status Date: 10/18/2019

Settlement Amount: \$27,500.00

Individual Contribution Amount: \$0.00

Disclosure 8 of 13

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: ORIENTAL FINANCIAL SERVICES

Allegations: PERIOD 6/29/2009 TO 10/24/2013. ALLEGE MISREPRESENTATION AND OMISSION, BREACH OF FID CONTRACT, UNSUITABLE RECOMMENDATIONS, FAILURE TO SUPERVISE, FRAUD, NEGLIGENCE

Product Type: Debt-Municipal
Other: PR CEF

Alleged Damages: \$410,000.00

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 #: 18-01884
Filing date of arbitration/CFTC reparation or civil litigation: 05/09/2018

Customer Complaint Information

Date Complaint Received: 06/04/2018
Complaint Pending? No
Status: Settled
Status Date: 10/03/2019
Settlement Amount: \$90,000.00
Individual Contribution Amount: \$0.00

Disclosure 9 of 13

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: ORIENTAL FINANCIAL SERVICES
Allegations: CLIENT ALLEGES UNSUITABLE RECOMMENDATIONS PR BONDS/PR CEF, CONCENTRATION, BREACH FIDUCIARY DUTY, NEGLIGENCE, FRAUD, BREACH OF CONTRACT,
Product Type: Debt-Municipal
Other: PR CEF
Alleged Damages: \$260,602.00
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 #: 17-03055
Filing date of arbitration/CFTC reparation or civil litigation: 11/13/2017

Customer Complaint Information

Date Complaint Received: 11/16/2017
Complaint Pending? No
Status: Settled
Status Date: 10/03/2019
Settlement Amount: \$80,000.00
Individual Contribution Amount: \$0.00

**Disclosure 10 of 13**

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: RAFAEL KODESH

Allegations: Customer alleges misrepresentations and omissions, breach of fiduciary duty, breach of contract,, unsuitable investment recommendations, failure to supervise, fraud, negligence, violation of FINRA rules (including NASD), violation of federal securities laws, and violation of the Puerto Rico Uniform Securities Act related to PR bonds/funds

Product Type: Debt-Municipal
Other: PR CEF AND OPENED FUNDS

Alleged Damages: \$500,000.00

Alleged Damages Amount Explanation (if amount not exact): Claim is for \$1million naming this RR and Fernando del Llano

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 #: 17-02950

Filing date of arbitration/CFTC reparation or civil litigation: 11/01/2017

Customer Complaint Information

Date Complaint Received: 11/03/2017

Complaint Pending? No

Status: Settled

Status Date: 12/05/2019

Settlement Amount: \$37,500.00

Individual Contribution Amount: \$0.00

Broker Statement DETAILS WERE PREVIOUSLY ENTERED BY ERROR IN LINE 12. S/BE LINE 7. KODESH-I deny all allegations in this claim. I have never been the advisor of [Customer Name] account at Oriental. Furthermore I do not know [Customer Name] and do not recall ever having any contact with her. CORRECTION DATE RECD. FROM 2018 to 2017. Reported on time.

Disclosure 11 of 13

Reporting Source: Individual



Employing firm when activities occurred which led to the complaint: ORIENTAL FINANCIAL SERVICES CORP.

Allegations: Time: 5/14/2010 to 6/28/2017. Customer allege OFS recommended high risk and unsuitable investments.

Product Type: Other: PR Mutual Funds

Alleged Damages: \$750,000.00

Alleged Damages Amount Explanation (if amount not exact): Range \$500,000 to \$1,000,000

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 #: 17-01721

Filing date of arbitration/CFTC reparation or civil litigation: 06/28/2017

Customer Complaint Information

Date Complaint Received: 07/12/2017

Complaint Pending? No

Status: Settled

Status Date: 11/05/2019

Settlement Amount: \$312,000.00

Individual Contribution Amount: \$0.00

Disclosure 12 of 13

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: Oriental Financial Services

Allegations: Customer allege high risk and unsuitable closed-end funds and opened-end invested.

Product Type: Mutual Fund
Other: PR Closed End Funds

Alleged Damages: \$250,000.00

Alleged Damages Amount Explanation (if amount not exact): \$100,000 to \$500,000

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 #: 17-01715

Filing date of arbitration/CFTC reparation or civil litigation: 06/28/2017

Customer Complaint Information

Date Complaint Received: 07/06/2017

Complaint Pending? No

Status: Settled

Status Date: 03/12/2019

Settlement Amount: \$200,000.00

Individual Contribution Amount: \$0.00

Disclosure 13 of 13

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: Oriental Financial Services

Allegations: Customer claims recommendation was negligent and unsuitable and cause severe losses

Product Type: Other: Closed End Funds

Alleged Damages: \$838,896.00

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 #: 16-02438

Filing date of arbitration/CFTC reparation or civil litigation: 08/18/2016

Customer Complaint Information

Date Complaint Received: 08/29/2016

Complaint Pending? No

Status: Settled



Status Date: 10/24/2018
Settlement Amount: \$250,000.00
Individual Contribution Amount: \$0.00

Broker Statement

I strongly denied all the allegations. When account initially opened client transferred positions from UBS and when he deposited new funds he specifically solicited positions that were from PR in order to avoid paying taxes from income generated and for his estate to avoid paying taxes. In numerous occasions client was offered alternative investments outside of PR, but client declined for reasons previously mentioned. At the time of purchase , all investments were deemed suitable and all of the PR bonds purchased were investment grade or better at the time of purchase. Customer was explained all risks associated with investments in his account and transactions were authorized by client. In numerous occasions conversations were had with client discussing PR situation and client agreed to hold on to positions.



End of Report

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