



## IAPD Report

# TRAVIS JOHN HUDAK

CRD# 3128251

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Please contact FINRA with any concerns.



## IAPD Information About Representatives

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

### What is included in a IAPD report?

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

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

### Where did this information come from?

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

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

### How current is this information?

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

### Need help interpreting this report?

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

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

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

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

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



## Report Summary

### TRAVIS JOHN HUDAK (CRD# 3128251)

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 **04/01/2024**.

### CURRENT EMPLOYERS

Firm	CRD#	Registered Since
IA PREMIER INVESTMENT MANAGEMENT, LLC	CRD# 318217	03/14/2022

### 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 TRANSITIONAL BROKER	304313	draper, UT	05/01/2020 - 11/15/2021
IA LONE PEAK ADVISERS	296772	DRAPER, UT	12/20/2018 - 11/15/2021
IA LONE PEAK CAPITAL MANAGEMENT, LLC	284298	DRAPER, UT	01/30/2017 - 03/23/2021

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
Investigation	1
Termination	2
Financial	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: **PREMIER INVESTMENT MANAGEMENT, LLC**  
Main Address: HUMACAO, PR  
Firm ID#: 318217

Regulator	Registration	Status	Date
<b>IA</b> Utah	Investment Adviser Representative	Approved	03/14/2022

#### Branch Office Locations

**PREMIER INVESTMENT MANAGEMENT, LLC**  
HUMACAO, PR



## 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 1 principal/supervisory exam, 2 general industry/product exams, and 2 state securities law exams.**

#### Principal/Supervisory Exams

Exam	Category	Date
General Securities Principal Examination (S24)	Series 24	09/29/2007

#### General Industry/Product Exams

Exam	Category	Date
Securities Industry Essentials Examination (SIE)	SIE	06/27/2018
General Securities Representative Examination (S7)	Series 7	10/07/1998

#### State Securities Law Exams

Exam	Category	Date
Uniform Investment Adviser Law Examination (S65)	Series 65	10/21/1999
Uniform Securities Agent State Law Examination (S63)	Series 63	10/20/1998

### PROFESSIONAL DESIGNATIONS

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

No information reported.



## Registration & Employment History

### PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
B	05/01/2020 - 11/15/2021	TRANSITIONAL BROKER	CRD# 304313	draper, UT
IA	12/20/2018 - 11/15/2021	LONE PEAK ADVISERS	CRD# 296772	DRAPER, UT
IA	01/30/2017 - 03/23/2021	LONE PEAK CAPITAL MANAGEMENT, LLC	CRD# 284298	DRAPER, UT
IA	02/27/2008 - 12/19/2018	LEGACY PLANNING GROUP	CRD# 145130	DRAPER, UT
B	03/25/2008 - 06/27/2018	H. BECK, INC.	CRD# 1763	Draper, UT
B	10/16/2007 - 04/01/2008	GUNNALLEN FINANCIAL, INC	CRD# 17609	SALT LAKE CITY, UT
IA	11/24/2003 - 12/10/2007	INVESTMENT MANAGEMENT CORPORATION	CRD# 37196	SALT LAKE CITY, UT
B	10/28/2003 - 12/10/2007	INVESTMENT MANAGEMENT CORPORATION	CRD# 37196	SALT LAKE CITY, UT
B	08/20/2002 - 11/11/2003	EAGLE GATE SECURITIES, INC.	CRD# 46959	SALT LAKE CITY, UT
IA	08/20/2002 - 11/11/2003	EAGLE GATE SECURITIES, INC.	CRD# 46959	SALT LAKE CITY, UT
IA	10/27/2003 - 10/29/2003	INVESTMENT MANAGEMENT CORPORATION	CRD# 37196	SALT LAKE CITY, UT
IA	12/16/1999 - 08/14/2002	UBS PAINWEBBER INC.	CRD# 8174	SALT LAKE CITY, UT
B	09/30/1999 - 08/14/2002	UBS PAINWEBBER INC.	CRD# 8174	WEEHAWKEN, NJ
B	11/11/1998 - 09/22/1999	FIDELITY BROKERAGE SERVICES, INC.	CRD# 7784	SMITHFIELD, RI



## Registration & Employment History

### 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
05/2019 - Present	Transitional Advisor	Owner & President	Y	Draper, UT, United States
06/2018 - Present	LONE PEAK ADVISORS	INVESTMENT ADVISER REPRESENTATIVE	Y	DRAPER, UT, United States
01/2017 - 12/2019	LONE PEAK CAPITAL MANAGEMENT, LLC	INVESTMENT ADVISER REPRESENTATIVE	Y	DRAPER, UT, United States
02/2008 - 12/2018	LEGACY PLANNING GROUP, LLC	INVESTMENT ADVISER REPRESENTATIVE	Y	DRAPER, UT, United States
03/2008 - 06/2018	H. BECK, INC.	REGISTERED REPRESENTATIVE	Y	DRAPER, UT, 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.

Premier Life Insurance Services, LLC

POSITION: MANAGING MEMBER. NATURE: Life Insurance sales. INVESTMENT RELATED: YES. NUMBER OF HOURS: 0.

SECURITIES TRADING HOURS: 0. START DATE: 02/01/2022

ADDRESS: 1481 E Meadow Bluff Lane Draper, UT 84020

DESCRIPTION: Life and fixed insurance services

Transitional Broker, LLC

POSITION: PARTNER/MEMBER. NATURE: Broker-Dealer. INVESTMENT RELATED: YES. NUMBER OF HOURS: 0.

INVESTMENT RELATED HOURS: 0. START DATE: 05/01/2020

ADDRESS: 11650 SOUTH STATE, SUITE 200, DRAPER, UT 84020

DESCRIPTION: Broker-Dealer



## 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
Investigation	1
Termination	2
Financial	1

### Investigation

This disclosure event involves any ongoing formal investigation such as a grand jury investigation, a Securities and Exchange Commission investigation, a formal investigation by a self-regulatory organization (e.g., FINRA), or an action or procedure designated as an investigation by a state or other regulator. Subpoenas, preliminary or routine regulatory inquiries, and general requests by these regulatory bodies for information are not considered investigations and therefore are not required to be reported.

#### Disclosure 1 of 1

**Reporting Source:** Firm

**Initiated By:** Utah State Division of Securities

**Notice Date:** 09/14/2021

**Details:** Mr. Hudak and I were brought into the Utah State Securities Division to resolve a customer complaint that was sent to them instead of directly to us. After working through the Utah Securities Division to resolve the complaint to the client's satisfaction, I was told later by the Utah State Securities Division that they still have an ongoing investigation on Mr. Hudak regarding Advertising and Marketing material that Utah state employees were complaining about to the Utah State Securities Division. I was told I would eventually get an initial notice/information request. This was taking them a long time and before they sent their request, I updated them on Mr. Hudak's termination. At that point I was told they escalated their investigation to the SEC who is our official regulator for Lone Peak Advisers. I have still not heard anything further from the Utah State Securities Division or the SEC.

**Is Investigation pending?** Yes

**Firm Statement** I assume this investigation is still open from what I was told by the Utah State Securities Division. I have not been contacted by any regulator to date with an information request or notification that the investigation has been closed.



## 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 2

**Reporting Source:** Firm  
**Firm Name:** Lone Peak Advisers, LLC and Transitional Broker LLC  
**Termination Type:** Discharged  
**Termination Date:** 11/15/2021  
**Allegations:** (See Comment to this section for more full details)

Lone Peak Advisers, LLC (LPA) and Transitional Broker, LLC (TB) terminated Mr. Hudak's employment for cause based on his violation of LPA's and TB's written procedures, his employment agreement (IAR agreement), as well as the regulations of the SEC and FINRA. More specifically, LPA and TB understand that Mr. Hudak engaged in the following misconduct:

?Trading Violations - "Front Running" & "Trading Ahead": While managing LPA client accounts, Mr. Hudak was using his discretionary trading authority in undisclosed brokerage accounts of his own and others. Mr. Hudak traded securities in these undisclosed accounts ahead of large block trades of the same securities in LPA clients' accounts.

?Undisclosed Brokerage Accounts -"Holding Away": Mr. Hudak failed to disclose certain brokerage accounts held by him, his immediate household, and other specific brokerage accounts controlled by him in which he had a personal interest.

?Improper Marketing Material: Mr. Hudak published two YouTube videos on his social media YouTube channel recommending to clients and the public two specific stocks, one of which is one of the same stocks involved in most of the trade violations already mentioned.

?Failure to Supervise: Mr. Hudak failed to properly document and maintain supervisory approval on all marketing, advertising, and sales literature prior to first use, most of which he created and for which he was responsible as the Delegated Compliance Officer all marketing.

?Undisclosed Office Location: For the year leading up to termination, Mr. Hudak generally worked at an undisclosed home office (not his residence) where he was conducting firm business.

?Intercepting Physical Mail for LPA and TB (Post Termination): Mr. Hudak intercepted and kept our company mail directly from the Post Office before it could be delivered. He had already been terminated for cause and notified.

**Product Type:** Derivative  
Equity-OTC  
Equity Listed (Common & Preferred Stock)  
Index Option  
Options

**Firm Statement** Lone Peak Advisers, LLC (LPA) and Transitional Broker, LLC (TB) terminated Mr. Hudak's employment for cause based on his violation of LPA's and TB's written policies and procedures, as well as rules and regulations of relevant regulatory bodies. More specifically, LPA and TB understand that Mr. Hudak engaged in the following misconduct:  
?Trading Violations - "Front Running" & "Trading Ahead": While managing LPA client accounts, Mr. Hudak was using his own account and his discretionary trading authority in the accounts of others, Mr. Hudak traded securities in these undisclosed accounts ahead of large block trades of the same securities in LPA



clients' accounts. Such conduct is prohibited by company policies, his employment agreement, the SEC, and FINRA.

?Undisclosed Brokerage Accounts -"Holding Away": Mr. Hudak failed to disclose certain brokerage accounts held by him, his immediate household, and other specific brokerage accounts controlled by him in which he had a personal interest, many of which were held outside of LPA. These accounts were not disclosed to the company and many of which had trading violations. Such conduct is prohibited by company written supervisory procedures, his employment agreement (IAR agreement), and FINRA Rule 3210 to name a few.

?Improper Marketing Material: Mr. Hudak published two YouTube videos on his social media YouTube channel recommending to clients and the general public two specific stocks, one of which is one of the same stocks involved in most of the trade violations already mentioned. Additionally, their were published marketing materials that were determined by the company to contain misleading statements and promissory language. Furthermore, Mr. Hudak operated a LinkedIn marketing campaign when LPA strictly prohibits any use of social media. Both of his use of YouTube and Linked violated company policy. The stock recommendations that Mr. Hudak made on 2 seperate YouTube videos violated FINRA Suitability Rule 2111, and SEC Regulation Best Interest. There was no way for Mr. Hudak to know if the recommendation was suitable for any potential viewer and there was no way for Mr. Hudak to deliver the Form CRS and Reg BI Disclosure documents to any potential viewer prior to his recommendations.

?Failure to Supervise: Mr. Hudak failed to properly document and maintain supervisory approval on all marketing, advertising, and sales literature prior to first use, most of which he created and for which he was responsible as the Delegated Compliance Officer marketing, advertising, and sales literature . Such conduct is prohibited by company policies, FINRA, and the SEC.

?Undisclosed Office Location: For the year leading up to termination, Mr. Hudak generally did not work from LPA's main office. Instead, he was often working at an undisclosed home office where he was conducting firm business, including trading, having business meetings with other advisors, marketing, and conducting Zoom meetings. That office should have been disclosed to determine if it qualified as a branch office which would require registration.

?Theft of Physical Mail for LPA and TB (Post Termination): Mr. Hudak sent a former employee to the Post Office when they opened and physically picked it up (stole it) on the false pretense that he had the right to since he was listed as one of the owners of both companies even though he had already been terminated for cause and notified. This prevented us from doing our compliance review, due diligence, logging incoming checks as required monitoring for complaints, etc. which put our company and clients in jeopardy of not processing checks, requests, complaints. The was returned once we confronted this violation with the perpetrator at the post office and filed a police report, but we have no idea if we received all the mail that was actually sent.

**Disclosure 2 of 2**

<b>Reporting Source:</b>	Firm
<b>Firm Name:</b>	Lone Peak Advisers, LLC
<b>Termination Type:</b>	Discharged
<b>Termination Date:</b>	11/15/2021
<b>Allegations:</b>	Failure to supervise his duties as the Delegated Compliance Officer of Marketing, Advertising, Sales Literature.
<b>Product Type:</b>	Other: Email marketing of RIA services for Lone Peak Advisers.



<b>Reporting Source:</b>	Individual
<b>Firm Name:</b>	Transitional Broker, LLC
<b>Termination Type:</b>	Discharged
<b>Termination Date:</b>	11/15/2021
<b>Allegations:</b>	Marketing Policy Violation
<b>Product Type:</b>	No Product
<b>Broker Statement</b>	<p>This termination for violating firm marketing policies was in no way a violation. I was the designated marketing compliance officer and every marketing piece created was approved and in no way violated any firm policy or regulatory rule. It was a retaliatory firing for a whistleblowing complaint I filed to the firm's Managing Member, David James. It should be noted that it was later discovered that Mr. James was a part of the violation that led to the whistleblowing complaint. The CCO, Brett Munson was also actively engaged in the violation discovered that led to the whistleblower complaint. This discovery of violations by Mr. Hudak and the implication of both David James and Brett Munson in the whistleblower complaint was the reason a retaliatory termination occurred.</p>



## Financial

This disclosure event involves a final bankruptcy, compromise with one or more creditors, or Securities Investor Protection Corporation liquidation that occurred within the last 10 years and that involved the Investment Adviser Representative or an organization/investment adviser that the Investment Adviser Representative controlled that occurred within the last 10 years.

### Disclosure 1 of 1

**Reporting Source:** Individual  
**Action Type:** Bankruptcy  
**Bankruptcy:** Chapter 13  
**Action Date:** 10/09/2023

### Organization Investment-Related?

**Type of Court:** Arbitration  
**Name of Court:** State of Utah  
**Location of Court:** Salt Lake City  
**Docket/Case #:** 23-24536  
**Action Pending?** Yes

### Broker Statement

Chapter 13 Reorganization is the result of an arbitration awarded to my former partner that exceed the arbitration award given to me resulting in a net negative award. In addition Legal fees associated with the award exceeded net worth and required a reorganization to repay creditors.



## End of Report

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