



IAPD Report

JEREMY NATHAN SWANK

CRD# 3168639

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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

JEREMY NATHAN SWANK (CRD# 3168639)

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 **04/08/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	JANNEY MONTGOMERY SCOTT LLC	CRD# 463	10/24/2024
IA	JANNEY MONTGOMERY SCOTT LLC	CRD# 463	10/24/2024

QUALIFICATIONS

This representative is currently registered in **3** SRO(s) and **33** jurisdiction(s).

Is this representative currently Inactive or Suspended with any regulator? **No**

Note: Not all jurisdictions require IAR registration or may have an exemption from registration.

Additional information including this individual's qualification examinations and professional designations is available in the Detailed Report.

REGISTRATION HISTORY

This representative was previously registered with the following firm(s):

	FIRM	CRD#	LOCATION	REGISTRATION DATES
IA	KESTRA ADVISORY SERVICES, LLC	283330	Mansfield, OH	08/29/2016 - 10/28/2024
B	KESTRA INVESTMENT SERVICES, LLC	42046	MANSFIELD, OH	08/29/2016 - 10/28/2024
IA	SUMMIT FINANCIAL GROUP INC	109485	MANSFIELD, OH	02/01/2010 - 08/29/2016

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	1
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 **33** jurisdiction(s) and 3 SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **JANNEY MONTGOMERY SCOTT LLC**
Main Address: 1717 ARCH STREET
PHILADELPHIA, PA 19103
Firm ID#: 463

Regulator	Registration	Status	Date
B FINRA	General Securities Principal	Approved	10/25/2024
B FINRA	General Securities Representative	Approved	10/25/2024
B Nasdaq Stock Market	General Securities Principal	Approved	10/24/2024
B Nasdaq Stock Market	General Securities Representative	Approved	10/24/2024
B New York Stock Exchange	General Securities Principal	Approved	10/24/2024
B New York Stock Exchange	General Securities Representative	Approved	10/24/2024
B Alabama	Agent	Approved	10/25/2024
B Arizona	Agent	Approved	10/25/2024
B California	Agent	Approved	10/25/2024
B Colorado	Agent	Approved	10/25/2024
B Florida	Agent	Approved	10/25/2024
B Georgia	Agent	Approved	10/25/2024
B Illinois	Agent	Approved	11/08/2024



Qualifications

Regulator	Registration	Status	Date
B Indiana	Agent	Approved	10/25/2024
B Iowa	Agent	Approved	10/25/2024
B Kentucky	Agent	Approved	10/25/2024
B Louisiana	Agent	Approved	10/25/2024
B Maine	Agent	Approved	10/25/2024
B Maryland	Agent	Approved	02/14/2025
B Massachusetts	Agent	Approved	10/25/2024
B Michigan	Agent	Approved	10/25/2024
B Mississippi	Agent	Approved	10/25/2024
B Montana	Agent	Approved	07/30/2025
B Nevada	Agent	Approved	10/25/2024
B New Hampshire	Agent	Approved	03/20/2025
B New Mexico	Agent	Approved	10/25/2024
B New York	Agent	Approved	10/25/2024
B North Carolina	Agent	Approved	10/31/2024
IA Ohio	Investment Adviser Representative	Approved	10/24/2024
B Ohio	Agent	Approved	10/25/2024
B Oklahoma	Agent	Approved	10/30/2024
B Oregon	Agent	Approved	10/25/2024



Qualifications

Regulator	Registration	Status	Date
B Pennsylvania	Agent	Approved	10/30/2024
B South Carolina	Agent	Approved	10/29/2024
B Tennessee	Agent	Approved	11/04/2024
IA Texas	Investment Adviser Representative	Approved	10/24/2024
B Texas	Agent	Approved	10/25/2024
B Utah	Agent	Approved	04/09/2026
B Virginia	Agent	Approved	10/25/2024
B Washington	Agent	Approved	10/14/2025
B West Virginia	Agent	Approved	10/25/2024

Branch Office Locations

JANNEY MONTGOMERY SCOTT LLC
1230 Lexington Avenue
Mansfield, OH 44907



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 3 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
General Securities Principal Examination (S24)	Series 24	12/04/2009

General Industry/Product Exams

Exam	Category	Date
Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
General Securities Representative Examination (S7)	Series 7	02/06/1999

State Securities Law Exams

Exam	Category	Date
Uniform Combined State Law Examination (S66)	Series 66	02/13/2007
Uniform Investment Adviser Law Examination (S65)	Series 65	12/30/1999
Uniform Securities Agent State Law Examination (S63)	Series 63	02/15/1999

PROFESSIONAL DESIGNATIONS

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

Chartered Financial Consultant

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
IA	08/29/2016 - 10/28/2024	KESTRA ADVISORY SERVICES, LLC	CRD# 283330	Mansfield, OH
B	08/29/2016 - 10/28/2024	KESTRA INVESTMENT SERVICES, LLC	CRD# 42046	MANSFIELD, OH
IA	02/01/2010 - 08/29/2016	SUMMIT FINANCIAL GROUP INC	CRD# 109485	MANSFIELD, OH
B	01/28/2010 - 08/29/2016	SUMMIT BROKERAGE SERVICES, INC.	CRD# 34643	MANSFIELD, OH
IA	07/06/2006 - 02/09/2010	LPL FINANCIAL CORPORATION	CRD# 6413	MANSFIELD, OH
B	07/03/2006 - 02/09/2010	LPL FINANCIAL CORPORATION	CRD# 6413	MANSFIELD, OH
IA	04/11/2003 - 07/19/2006	EAGLE STRATEGIES CORP	CRD# 110826	DUBLIN, OH
B	10/21/2002 - 07/19/2006	NYLIFE SECURITIES INC.	CRD# 5167	DAYTON, OH
IA	01/14/2002 - 09/30/2002	WACHOVIA SECURITIES, INC.	CRD# 19616	MANSFIELD, OH
B	02/08/1999 - 09/30/2002	WACHOVIA SECURITIES, INC.	CRD# 19616	ST. LOUIS, MO

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
10/2024 - Present	Janney Montgomery Scott LLC	Financial Advisor	Y	Mansfield, OH, United States
08/2016 - 10/2024	KESTRA ADVISORY SERVICES, LLC	INVESTMENT ADVISOR REPRESENTATIVE	Y	MANSFIELD, OH, United States
08/2016 - 10/2024	KESTRA INVESTMENT SERVICES, LLC	REGISTERED REPRESENTATIVE	Y	MANSFIELD, OH, United States
08/2016 - 10/2024	NFP Advisor Services, LLC	Registered Rep	Y	Mansfield, OH, United States



Registration & Employment History

EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
01/2010 - 08/2016	SUMMIT BROKERAGE SERVICES INC	REG REP	Y	MANSFIELD, OH, United States
01/2010 - 08/2016	SUMMIT FINANCIAL GROUP INC	IA REP	Y	MANSFIELD, OH, United States

OTHER BUSINESS ACTIVITIES

This section includes information, if any, as provided by the representative regarding other business activities the representative is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent, or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious, or fraternal and is recognized as tax exempt.

1. Per Augusta In Augusta LLC, Mansfield, OH. Sole Owner (01/2004) - real estate investments. Compensated, 10 hours/month, investment related.
2. Taking Root Farms, Mansfield, OH. Taking Root Farms will empower and enhance the daily lives of adults with developmental disabilities living in Richland County and the surrounding region. Board Member (03/2024) - Advisement to non-profit operations. Not compensated, not investment related, 5 hours/month.



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	1
Termination	1

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

Reporting Source:	Regulator
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	Other: N/A
Date Initiated:	08/18/2011
Docket/Case Number:	2010021615501
Employing firm when activity occurred which led to the regulatory action:	LPL FINANCIAL LLC
Product Type:	Other: AGENCY BOND
Allegations:	FINRA RULE 2010 - JEREMY SWANK'S CUSTOMER PURCHASED \$935,465.50 OF AN AGENCY BOND WITH SWANK AT A MEMBER FIRM AND APPROXIMATELY ONE WEEK LATER, SWANK RECEIVED A COMPLAINT FROM THE CUSTOMER STATING THAT HE MISUNDERSTOOD THE BOND PURCHASE. SWANK SOLD THE POSITION FOR \$933,595.14 AND AT THE SAME TIME, THE CUSTOMER DEMANDED \$1,850 IN REALIZED LOSSES ON THE TRANSACTION AND \$3,300 ACCRUED INTEREST. IN LIEU OF THE CUSTOMER MAKING A FORMAL COMPLAINT TO SWANK'S FIRM, THE CUSTOMER AND SWANK ENTERED INTO A VERBAL SETTLEMENT AGREEMENT AND SWANK PAID THE CUSTOMER \$5,150 IN CASH. SWANK FAILED TO ADVISE HIS FIRM, ORALLY OR IN WRITING, ABOUT THE CUSTOMER'S COMPLAINT, THE SETTLEMENT OR THE \$5,150 PAYMENT.
Current Status:	Final



Resolution: 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? No

Resolution Date: 08/18/2011

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

If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise? No

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

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



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

Sanction 1 of 1

Sanction Type: Suspension
Capacities Affected: ANY CAPACITY
Duration: 10 BUSINESS DAYS
Start Date: 09/19/2011
End Date: 09/30/2011

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: Yes
Date Paid by individual: 08/24/2011
Was any portion of penalty waived? No

Amount Waived:

Regulator Statement WITHOUT ADMITTING OR DENYING THE FINDINGS, SWANK CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, HE IS FINED \$5,000 AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY FOR 10 BUSINESS DAYS. THE SUSPENSION IS IN EFFECT FROM SEPTEMBER 19, 2011 THROUGH SEPTEMBER 30, 2011.

Reporting Source: Individual
Regulatory Action Initiated By: FINRA
Sanction(s) Sought: Other: N/A
Date Initiated: 08/18/2011



Docket/Case Number: 2010021615501

Employing firm when activity occurred which led to the regulatory action: LPL FINANCIAL LLC

Product Type: Other: AGENCY BOND

Allegations: FINRA RULE 2010 - JEREMY SWANK'S CUSTOMER PURCHASED \$935,465.50 OF AN AGENCY BOND WITH SWANK AT A MEMBER FIRM AND APPROXIMATELY ONE WEEK LATER, SWANK RECEIVED A COMPLAINT FROM THE CUSTOMER STATING THAT HE MISUNDERSTOOD THE BOND PURCHASE. SWANK SOLD THE POSITION FOR \$933,595.14 AND AT THE SAME TIME, THE CUSTOMER DEMANDED \$1,850 IN REALIZED LOSSES ON THE TRANSACTION AND \$3,300 ACCRUED INTEREST. IN LIEU OF THE CUSTOMER MAKING A FORMAL COMPLAINT TO SWANK'S FIRM, THE CUSTOMER AND SWANK ENTERED INTO A VERBAL SETTLEMENT AGREEMENT AND SWANK PAID THE CUSTOMER \$5,150 IN CASH. SWANK FAILED TO ADVISE HIS FIRM, ORALLY OR IN WRITING, ABOUT THE CUSTOMER'S COMPLAINT, THE SETTLEMENT OR THE \$5,150 PAYMENT.

Current Status: Final

Resolution: 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? No

Resolution Date: 08/18/2011

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

Sanction 1 of 1

Sanction Type: Suspension

Capacities Affected: ANY CAPACITY

Duration: 10 BUSINESS DAYS

Start Date: 09/19/2011

End Date: 09/30/2011

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: No

Date Paid by individual:

Was any portion of penalty waived? No



Amount Waived:

Broker Statement

WITHOUT ADMITTING OR DENYING THE FINDINGS, SWANK CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, HE IS FINED \$5,000 AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY FOR 10 BUSINESS DAYS. THE SUSPENSION IS IN EFFECT FROM SEPTEMBER 19, 2011 THROUGH SEPTEMBER 30, 2011.



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 1

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	Kestra Investment Services
Allegations:	Client is concerned with the market fluctuation and demanded the advisor stop making trades without prior approval form the client.
Product Type:	No Product
Alleged Damages:	\$34,000.00
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:	12/29/2017
Complaint Pending?	No
Status:	Denied
Status Date:	01/03/2018
Settlement Amount:	
Individual Contribution Amount:	



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: Firm

Firm Name: LPL FINANCIAL

Termination Type: Discharged

Termination Date: 01/20/2010

Allegations: FIRM REVIEWED EVIDENCE THAT ADVISOR FAILED TO REPORT A CUSTOMER COMPLAINT AND SETTLED DIRECTLY WITH THE CUSTOMER.

Product Type: No Product

Reporting Source: Individual

Firm Name: LPL FINANCIAL CORP

Termination Type: Discharged

Termination Date: 01/20/2010

Allegations: FIRM REVIEWED EVIDENCE THAT ADVISOR FAILED TO REPORT A CUSTOMER COMPLAINT AND SETTLED DIRECTLY WITH THE CUSTOMER.

Product Type: No Product

Broker Statement THE FIRM REVIEWED CURSORY EVIDENCE OF A POSSIBLE CUSTOMER COMPLAINT. CLIENT BECAME A CUSTOMER OF MINE IN 6/2008. HE USUALLY BOUGHT US TREASURIES. IN SEPT 2009 THE CUSTOMER BOUGHT A FNMA AT A BETTER RATE THAN A TREASURY BOND. APPROXIMATELY ONE WEEK LATER, HE CALLED TO SAY HE DID NOT WANT THE FNMA BECAUSE IT WAS NOT A U.S. TREASURY AND TO SELL IT. THERE WAS A SMALL LOSS. THE CLIENT, AT THE TIME, INDICATED TO ME THAT HE DIDN'T WANT TO FILE A FORMAL COMPLAINT AGAINST ME. WE HAD A FRIENDLY RELATIONSHIP AND HE SUGGESTED THE SETTLEMENT TERMS AND AN AMOUNT TO MAKE HIM WHOLE. THE CLIENT LATER DID UNSOLICITED BUSINESS WITH ME AND INDICATED A DESIRE TO DO SO. I ACKNOWLEDGE THAT THIS WAS POOR JUDGMENT ON MY PART AND WOULD CONSULT MY FIRM'S PROCEDURES AND COMPLIANCE DEPARTMENT IF PLACED IN THIS ISOLATED CIRCUMSTANCE AGAIN.



End of Report

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