



IAPD Report

LUCIANO MANUEL CUNEO

CRD# 4068829

<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

LUCIANO MANUEL CUNEO (CRD# 4068829)

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 **11/02/2022**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	SCALA CAPITAL LLC	CRD# 156165	12/09/2020

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	MARCO POLO SECURITIES INC.	46561	NEW YORK, NY	01/03/2022 - 11/02/2022
IA	KOVACK INTERNATIONAL ADVISORS INC.	170450	Miami, FL	01/02/2020 - 01/13/2020
B	KOVACK INTERNATIONAL WEALTH MANAGEMENT, INC.	164117	Miami, FL	10/15/2019 - 01/13/2020

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	2
Termination	2



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: **SCALA CAPITAL LLC**
Main Address: 999 BRICKELL AVENUE
SUITE 1006
MIAMI, FL 33131
Firm ID#: 156165

	Regulator	Registration	Status	Date
	Florida	Investment Adviser Representative	Approved	12/09/2020

Branch Office Locations

SCALA CAPITAL LLC
999 BRICKELL AVENUE
SUITE 1006
MIAMI, FL 33131



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, 4 general industry/product exams, and 2 state securities law exams.





Principal/Supervisory Exams

Exam	Category	Date
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No information reported.




General Industry/Product Exams

Exam	Category	Date
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	Investment Banking Registered Representative Examination (S79TO)	Series 79TO	01/02/2023
	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
	Futures Managed Funds Examination (S31)	Series 31	01/14/2000
	General Securities Representative Examination (S7)	Series 7	12/08/1999

State Securities Law Exams

Exam	Category	Date
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		Uniform Combined State Law Examination (S66)	Series 66	09/04/2014
		Uniform Securities Agent State Law Examination (S63)	Series 63	12/17/1999

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	01/03/2022 - 11/02/2022	MARCO POLO SECURITIES INC.	CRD# 46561	NEW YORK, NY
IA	01/02/2020 - 01/13/2020	KOVACK INTERNATIONAL ADVISORS INC.	CRD# 170450	Miami, FL
B	10/15/2019 - 01/13/2020	KOVACK INTERNATIONAL WEALTH MANAGEMENT, INC.	CRD# 164117	Miami, FL
IA	09/05/2014 - 10/02/2019	RAYMOND JAMES & ASSOCIATES, INC.	CRD# 705	CORAL GABLES, FL
B	02/12/2014 - 10/02/2019	RAYMOND JAMES & ASSOCIATES, INC.	CRD# 705	CORAL GABLES, FL
B	11/06/2012 - 01/31/2014	ARCA CAPITAL INVESTMENTS, INC.	CRD# 109819	MIAMI, FL
B	03/13/2012 - 11/05/2012	NIGHTHAWK PARTNERS INC.	CRD# 44134	AUSTIN, TX
B	04/06/2009 - 03/26/2012	STONEHAVEN, LLC	CRD# 118913	NEW YORK, NY
B	05/09/2003 - 06/28/2007	PFS INVESTMENTS INC.	CRD# 10111	DULUTH, GA
B	04/17/2002 - 12/04/2002	STATETRUST INVESTMENTS INC.	CRD# 104651	BOCA RATON, FL
B	12/09/1999 - 04/09/2002	SALOMON SMITH BARNEY INC.	CRD# 7059	NEW YORK, NY

EMPLOYMENT HISTORY

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

Employment Dates	Employer Name	Position	Investment Related	Employer Location
12/2021 - Present	Marco Polo Securities Inc.	Sales Rep	Y	New York, NY, United States
10/2020 - Present	SCALA CAPITAL LLC	INVESTMENT ADVISOR REPRESENTATIVE	Y	Miami, FL, United States
02/2020 - Present	LMC ALTERNATIVE BUSINESS CAPITAL	President	N	Miami, FL, United States



Registration & Employment History



EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
10/2019 - 01/2020	Kovack International Advisors, Inc.	Investment Advisor	Y	Miami, FL, United States
10/2019 - 01/2020	Kovack International Wealth Management, Inc.	Registered Rep	Y	Miami, FL, United States
02/2014 - 10/2019	RAYMOND JAMES & ASSOCIATES, INC.	FINANCIAL ADVISOR	Y	CORAL GABLES, FL, 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.

LMC ALTERNATIVE BUSINESS CAPITAL - Non-Investment Related.

11179 NW 80th St., Doral, FL 33178

Commercial Finance Company - President

Since Jan 2020



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	2
Termination	2

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 2

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: SALOMON SMITH BARNEY

Allegations: CLIENT ALLEGED THAT A PURCHASE OF A CORPORATE BOND IN HER ACCOUNT WAS UNAUTHORIZED - FEBRUARY 2001.

DAMAGES UNSPECIFIED.

Product Type: Debt - Corporate

Alleged Damages:

Customer Complaint Information

Date Complaint Received: 09/28/2001

Complaint Pending? No

Status: Denied

Status Date: 03/22/2002

Settlement Amount:

Individual Contribution Amount:

Firm Statement THE CLAIM WAS DENIED.



Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: SALOMON SMITH BARNEY

Allegations: CLIENT ALLEGED THAT A PURCHASE OF A CORPORATE BOND IN HER ACCOUNT WAS UNAUTHORIZED. ALLEGED DAMAGES UNSPECIFIED. FEBRUARY 2001.

Product Type: Debt - Corporate

Alleged Damages:

Customer Complaint Information

Date Complaint Received: 09/28/2001

Complaint Pending? No

Status: Denied

Status Date: 03/22/2002

Settlement Amount:

Individual Contribution Amount:

Broker Statement THE CLAIM WAS DENIED.

Disclosure 2 of 2

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: SALOMON SMITH BARNEY

Allegations: THE CLIENT ALLEGED HIS FC PURCHASED SHARES THAT CHANGE VALUE WHEN HE SPECIFICALLY REQUESTED FIXED VALUE SHARES. THE CLIENT ALSO ALLEGED HIS FC DID NOT ASK HIM BEFORE BUYING THE SHARES ON HIS BEHALF.

ALLEGED DAMAGES UNSPECIFIED.

Product Type: Equity Listed (Common & Preferred Stock)

Alleged Damages:

Customer Complaint Information

Date Complaint Received: 07/28/2000

Complaint Pending? No

Status: Closed/No Action

Status Date: 10/09/2000

Settlement Amount:

Individual Contribution Amount:

Broker Statement BRANCH COMMUNICATED WITH CLIENT AND RESOLVED MISUNDERSTANDING OF CLIENT. CLIENT SENT LETTER CONFIRMING THIS.





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: RAYMOND JAMES & ASSOCIATES
Termination Type: Discharged
Termination Date: 09/18/2019
Allegations: Terminated for not being forthcoming during an internal review regarding integrity of client signatures.
Product Type: No Product

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Reporting Source: Individual
Firm Name: Raymond James & Associates
Termination Type: Discharged
Termination Date: 09/18/2019
Allegations: Terminated for not being forthcoming during an internal review regarding integrity of client signatures.
Product Type: No Product

Disclosure 2 of 2

Reporting Source: Individual
Firm Name: SMITH BARNEY, INC.
Termination Type: Permitted to Resign
Termination Date: 03/27/2002
Allegations: POLICY VIOLATION CONCERNING CORRESPONDENCE
Product Type: Money Market Fund

Broker Statement AT THE BEGINNING OF 2001, [REDACTED] AND WIFE [REDACTED] OPENED A SMALL MONEY MARKET ACCOUNT WITH SMITH BARNEY. [REDACTED] AND [REDACTED] ARE DIRECT UNCLE AND AUNT OF MY WIFE MARINA CUNEO. THEY MOVED TO MIAMI FROM LIMA, PERU AND LIVED IN OUR HOUSE FOR A FEW MONTHS. THEY REQUESTED TO HAVE THEIR MAILING ADDRESS AT OUR HOUSE SINCE THEY WERE LIVING WITH US. AFTER 18 MONTHS, SMITH BARNEY REALIZED THAT I WAS RECEIVING THOSE STATEMENTS AT MY HOUSE AND DECIDED TO TERMINATE ME. I THOUGHT IT WAS VERY UNFAIR BECAUSE I WAS NAIVE AND INNOCENT HOWEVER I LEARNED FROM MY MISTAKES EARLY IN MY CAREER.



End of Report

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