



IAPD Report

Scott Michael Bremus

CRD# 4073006

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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

Scott Michael Bremus (CRD# 4073006)

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 **07/18/2025**.

CURRENT EMPLOYERS

| | Firm | CRD# | Registered Since |
|----|-------------------------|-------------|------------------|
| IA | SAN BLAS ADVISORY, INC. | CRD# 296929 | 03/31/2025 |

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **3** 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 | EUDAIMONIA PARTNERS, LLC | 283884 | Dacula, GA | 02/07/2022 - 04/02/2025 |
| IA | HAMILTON INVESTMENT COUNSEL, LLC | 284564 | DACULA, GA | 10/17/2016 - 11/08/2021 |
| B | LPL FINANCIAL LLC | 6413 | DACULA, GA | 10/14/2016 - 10/29/2021 |

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 |
|------------------|-------|
| Regulatory Event | 2 |
| Customer Dispute | 2 |
| 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 **3** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **SAN BLAS ADVISORY, INC.**

Main Address: 3424 PEACHTREE ROAD NE
SUITE 2200
ATLANTA, GA 30326

Firm ID#: 296929

| Regulator | Registration | Status | Date |
|-------------------|-----------------------------------|---------------------------|------------|
| IA Georgia | Investment Adviser Representative | Approved | 03/31/2025 |
| IA North Carolina | Investment Adviser Representative | Approved | 05/14/2025 |
| IA South Carolina | Investment Adviser Representative | Approved - Pending IAR CE | 01/01/2026 |

Branch Office Locations

SAN BLAS ADVISORY, INC.

2078 Teron Trace
suite 100
Dacula, GA 30019



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 |
|--------------------------|----------|------|
| No information reported. | | |

General Industry/Product Exams

| Exam | Category | Date |
|--|----------|------------|
|  Securities Industry Essentials Examination (SIE) | SIE | 10/01/2018 |
|  General Securities Representative Examination (S7) | Series 7 | 01/05/2000 |

State Securities Law Exams

| Exam | Category | Date |
|---|-----------|------------|
|   Uniform Combined State Law Examination (S66) | Series 66 | 01/26/2000 |

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 |
|----|-------------------------|--|-------------|-----------------|
| IA | 02/07/2022 - 04/02/2025 | EUDAIMONIA PARTNERS, LLC | CRD# 283884 | Dacula, GA |
| IA | 10/17/2016 - 11/08/2021 | HAMILTON INVESTMENT COUNSEL, LLC | CRD# 284564 | DACULA, GA |
| B | 10/14/2016 - 10/29/2021 | LPL FINANCIAL LLC | CRD# 6413 | DACULA, GA |
| IA | 06/30/2016 - 11/11/2016 | STERNE AGEE INVESTMENT ADVISOR SERVICES, INC. | CRD# 174182 | BIRMINGHAM, AL |
| B | 10/16/2009 - 11/11/2016 | STERNE AGEE FINANCIAL SERVICES, INC. | CRD# 18456 | DACULA, GA |
| IA | 10/23/2009 - 06/30/2016 | STERNE AGEE ASSET MANAGEMENT, INC. | CRD# 130888 | DACULA, GA |
| B | 06/01/2009 - 11/11/2009 | MORGAN STANLEY SMITH BARNEY | CRD# 149777 | BRASELTON, GA |
| IA | 06/01/2009 - 11/11/2009 | MORGAN STANLEY SMITH BARNEY LLC | CRD# 149777 | BRASELTON, GA |
| B | 02/27/2004 - 06/01/2009 | CITIGROUP GLOBAL MARKETS INC. | CRD# 7059 | BRASELTON, GA |
| IA | 02/27/2004 - 06/01/2009 | CITIGROUP GLOBAL MARKETS INC. | CRD# 7059 | BRASELTON, GA |
| B | 01/06/2000 - 03/02/2004 | MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED | CRD# 7691 | 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 |
|-------------------|----------------------------------|---|--------------------|------------------------------|
| 01/2022 - Present | Eudaimonia Partners, LLC | Investment Advisor Representative | Y | Braselton, GA, United States |
| 10/2016 - 10/2021 | Hamilton Investment Counsel, LLC | Principal and Investment Advisor Representative | Y | Dacula, GA, United States |
| 10/2016 - 10/2021 | LPL Financial LLC | Registered Representative | Y | Dacula, GA, United States |



Registration & Employment History

EMPLOYMENT HISTORY

| Employment Dates | Employer Name | Position | Investment Related | Employer Location |
|-------------------|---|-----------------------------------|--------------------|-------------------------------|
| 06/2016 - 10/2016 | STERNE AGEE INVESTMENT ADVISOR SERVICES, INC. | Investment Advisor Representative | Y | BIRMINGHAM, AL, United States |
| 10/2009 - 10/2016 | STERNE AGEE FINANCIAL SERVICES INC. | REGISTERED REPRESENTATIVE | Y | BUFORD, GA, 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) 10/14/2016: Fourth Fifth, LLC - Business Entity for tax/expenses purposes only - Not Investment Related - 2040 Forest Glen Dr, Braselton, GA 30517 - Start 07/26/2016 - 1 Hr/Mo; 0 Hour(s) During Securities Trading; 1% Time Spent



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 | 2 |
| Customer Dispute | 2 |
| 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 2

| | |
|--|--|
| Reporting Source: | Regulator |
| Regulatory Action Initiated By: | FINRA |
| Sanction(s) Sought: | |
| Date Initiated: | 10/06/2023 |
| Docket/Case Number: | 2021073072701 |
| Employing firm when activity occurred which led to the regulatory action: | LPL Financial LLC |
| Product Type: | Promissory Note |
| Allegations: | Without admitting or denying the findings, Bremus consented to the sanctions and to the entry of findings that he participated in a private securities transaction, for which he received no selling compensation, without providing prior written notice to, or obtain written approval from, his member firm. The findings stated that the private securities transaction involved two of his firm customers, a married couple. Bremus introduced the married couple to a registered representative, who was also registered with FINRA through an association with the firm, to facilitate a discussion among them regarding an investment in a company. The representative engaged in OBAs that he did not disclose to the firm and caused firm clients to transfer money from their firm accounts to those OBAs, one of which was the company. The married couple entered into a \$300,000 promissory note with the company. With the customers' authorization, Bremus electronically signed and submitted firm "Move Money" forms to request a \$125,000 wire transfer from the of the customer's firm account to the company and a \$175,000 wire transfer from the |



other customer's firm account to the company. Bremus attested on the forms that he "did not solicit, recommend, or otherwise participate in the underlying transaction or investment for which this transfer was requested." Bremus thereafter communicated with the representative regarding the status of the customers' investment in the company.

| | |
|---|---|
| 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: | 10/06/2023 |
| 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: All Capacities
Duration: six months
Start Date: 10/16/2023
End Date: 04/15/2024

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)
Total Amount: \$10,000.00
Portion Levied against individual: \$10,000.00
Payment Plan: deferred
Is Payment Plan Current: No
Date Paid by individual:
Was any portion of penalty waived? No

**Amount Waived:**

Reporting Source: Individual
Regulatory Action Initiated By: Financial Industry Regulatory Authority (FINRA)

Sanction(s) Sought: Suspension

Date Initiated: 09/09/2022

Docket/Case Number: [2021073072701](#)

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

Product Type: Promissory Note

Allegations: Mr. Bremus participated in a private securities transaction, for which he received no selling compensation, without providing prior written notice to, or obtain written approval from, his member firm. The findings stated that the private securities transaction involved two of his firm customers, a married couple. Bremus introduced the married couple to a registered representative, who was also registered with FINRA through an association with the firm, to facilitate a discussion among them regarding an investment in a company. The representative engaged in OBAs that he did not disclose to the firm and caused firm clients to transfer money from their firm accounts to those OBAs, one of which was the company. The married couple entered into a \$300,000 promissory note with the company. With the customers' authorization, Bremus electronically signed and submitted firm "Move Money" forms to request a \$125,000 wire transfer from the of the customer's firm account to the company and a \$175,000 wire transfer from the other customer's firm account to the company. Bremus attested on the forms that he "did not solicit, recommend, or otherwise participate in the underlying transaction or investment for which this transfer was requested." Bremus thereafter communicated with the representative regarding the status of the customers' investment in the company.

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: 10/06/2023

Sanctions Ordered: Suspension

Sanction 1 of 1

Sanction Type: Suspension

Capacities Affected: All Capacities

Duration: six months

Start Date: 10/06/2023

End Date: 04/15/2024

**Monetary Sanction 1 of 1****Monetary Related Sanction:** Civil and Administrative Penalty(ies)/Fine(s)**Total Amount:** \$10,000.00**Portion Levied against individual:** \$10,000.00**Payment Plan:****Is Payment Plan Current:** No**Date Paid by individual:****Was any portion of penalty waived?** No**Amount Waived:****Disclosure 2 of 2****Reporting Source:** Individual**Regulatory Action Initiated By:** State Bar of Georgia**Sanction(s) Sought:** Other: Voluntary Surrender of Law License**Date Initiated:** 05/01/2000**Docket/Case Number:** 529 S.E. 2d 370 (GA. 2000)**Employing firm when activity occurred which led to the regulatory action:** N/A**Product Type:** No Product**Allegations:**
While practicing law in Georgia as an attorney, Mr. Bremus became the subject of a Georgia Bar investigation concerning allegations that he submitted certain papers in a legal proceeding bearing inaccurate dates. While the investigation still was pending, Mr. Bremus elected to voluntarily surrender his license to practice law in Georgia, which voluntary petition was accepted on May 1, 2000.**Current Status:** Final**Resolution:** Petition for voluntary surrender of law license**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?** Yes**Resolution Date:** 05/01/2000**Sanctions Ordered:** Bar (Permanent)**Sanction 1 of 1****Sanction Type:** Bar (Permanent)**Capacities Affected:** Adviser petitioned court for voluntary surrender of his law license in the state of Ga.



Duration:

Start Date: 05/01/2000

End Date:



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: | Individual |
| Employing firm when activities occurred which led to the complaint: | MORGAN STANLEY SMITH BARNEY |
| Allegations: | CLIENT'S ATTORNEY ALLEGED MISREPRESENTATION WITH RESPECT TO VARIABLE ANNUITY INVESTMENT - DECEMBER 2006. DAMAGES UNSPECIFIED. |
| Product Type: | Annuity-Variable |
| Alleged Damages: | \$0.00 |
| 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: | 06/01/2009 |
| Complaint Pending? | No |
| Status: | Settled |
| Status Date: | 09/08/2009 |
| Settlement Amount: | \$60,000.00 |
| Individual Contribution Amount: | \$0.00 |
| Broker Statement | THE ALLEGED MISREPRESENTATIONS IN THIS COMPLAINT WERE BASED ON FALSE MATERIEL PROVIDED TO ME BY PAUL D. MCGRATH CRD # 1053178 WHO WAS THE METLIFE WHOLESALER WHO WAS LATER TERMINATED FOR USING THIS UNAPPROVED SALES MATERIEL. |

Disclosure 2 of 2

| | |
|--|---|
| Reporting Source: | Firm |
| Employing firm when activities occurred which led to the complaint: | CITIGROUP GLOBAL MARKETS INC. |
| Allegations: | THE CLIENT ALLEGED MISREPRESENTATION WITH RESPECT TO ANNUITY - 12/28/08. DAMAGES UNSPECIFIED. |
| Product Type: | Annuity-Variable |
| Alleged Damages: | \$0.00 |



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: 06/30/2008

Complaint Pending? No

Status: Denied

Status Date: 10/13/2009

Settlement Amount:

Individual Contribution Amount:

Firm Statement CLAIM DENIED.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: CITIGROUP GLOBAL MARKETS INC.

Allegations: THE CLIENT ALLEGED MISREPRESENTATION WITH RESPECT TO ANNUITY - 12/28/08.
DAMAGES UNSPECIFIED.

Product Type: Annuity-Variable

Alleged Damages: \$0.00

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: 06/30/2008

Complaint Pending? No

Status: Denied

Status Date: 10/13/2009

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 LLC
Termination Type: Discharged
Termination Date: 10/01/2021
Allegations: Facilitated private securities transactions without Firm approval.
Product Type: Promissory Note

Reporting Source: Individual
Firm Name: LPL FINANCIAL LLC
Termination Type: Discharged
Termination Date: 10/01/2021
Allegations: Facilitated private securities transactions without Firm approval.
Product Type: Promissory Note



End of Report

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