



IAPD Report

RICARDO DE LA GARZA EMERICH

CRD# 4246723

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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

RICARDO DE LA GARZA EMERICH (CRD# 4246723)

The report summary provides an overview of the representative's professional background and conduct. The information contained in this report has been provided by the representative, investment adviser and/or securities firms, and/or securities regulators as part of the states' investment adviser registration and licensing process. The information contained in this report was last updated by the representative, a previous employing firm, or a securities regulator on **08/17/2023**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	PRIVATE PORTFOLIO, INC.	CRD# 36644	07/15/2022
IA	PRIVATE PORTFOLIO OF SAN DIEGO	CRD# 36644	11/02/2022

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **2** 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	TITLEIST ASSET MANAGEMENT, LTD.	126136	HOUSTON, TX	01/02/2014 - 07/08/2022
B	ARGENTUS SECURITIES, LLC	45915	GARCIA, NL	03/16/2010 - 01/07/2014
B	BASE SECURITIES, LLC	131922	HOUSTON, TX	12/07/2004 - 11/30/2010

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



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

Employment 1 of 1

Firm Name: **PRIVATE PORTFOLIO OF SAN DIEGO**

Main Address: 7816 IVANHOE AVE STE 10
LA JOLLA, CA 92037

Firm ID#: 36644

Regulator	Registration	Status	Date
B FINRA	General Securities Representative	Approved	07/15/2022
B California	Agent	Approved	07/15/2022
B Texas	Agent	Approved	07/15/2022
IA Texas	Investment Adviser Representative	Approved	11/02/2022

Branch Office Locations

PRIVATE PORTFOLIO OF SAN DIEGO

Torre Alestra 391
COLONIA RESIDENCIAL SAN AGUSTIN
San Pedro Garza Garcia, Mexico 66260

PRIVATE PORTFOLIO OF SAN DIEGO

7816 Ivanhoe Ave. Ste #10
La Jolla, CA 92037



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 2 principal/supervisory exams, 4 general industry/product exams, and 1 state securities law exam.

Principal/Supervisory Exams

Exam	Category	Date
 Introducing Broker/Dealer Financial Operations Principal Examination (S28)	Series 28	07/01/2004
 General Securities Principal Examination (S24)	Series 24	12/17/2003

General Industry/Product Exams

Exam	Category	Date
 Operations Professional Examination (S99TO)	Series 99TO	01/02/2023
 Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
 National Commodity Futures Examination (S3)	Series 3	08/13/2010
 General Securities Representative Examination (S7)	Series 7	02/03/2003

State Securities Law Exams

Exam	Category	Date
 Uniform Securities Agent State Law Examination (S63)	Series 63	09/09/2004

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	01/02/2014 - 07/08/2022	TITLEIST ASSET MANAGEMENT, LTD.	CRD# 126136	HOUSTON, TX
B	03/16/2010 - 01/07/2014	ARGENTUS SECURITIES, LLC	CRD# 45915	GARCIA, NL
B	12/07/2004 - 11/30/2010	BASE SECURITIES, LLC	CRD# 131922	HOUSTON, TX
B	02/06/2003 - 06/14/2004	BANORTE SECURITIES INTERNATIONAL, LTD.	CRD# 30648	HOUSTON, TX
B	08/03/2000 - 06/11/2002	CAMBRIDGE GROUP INVESTMENTS, LTD.	CRD# 47399	LANSING, MI

EMPLOYMENT HISTORY

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

Employment Dates	Employer Name	Position	Investment Related	Employer Location
07/2022 - Present	PRIVATE PORTFOLIO, INC	REGISTERED REP	Y	LA JOLLA, CA, United States
10/2011 - Present	INTEGRA CONSULTING	CONSULTANT	N	HOUSTON, TX, United States
10/2007 - Present	RICA HOLDINGS, S.A. DE C.V.	OWNER	N	MONTERREY, Mexico
01/2014 - 07/2022	TITLEIST ASSET MANAGEMENT	REGISTERED REP	Y	HOUSTON, TX, 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.

INTEGRA CONSULTING, LLC - FORMALLY BASE SECURITIES, HOUSTON, TX - START 06/2004; EMPLOYEE, PART OWNER. SELL RISK MANAGEMENT SOFTWARE. TWO HOURS PER MONTH. PAID VIA SALARY AND COMMISSIONS.

RICA HOLDINGS, SA DE CV - HOLDING COMPANY THAT OWNS 50% OF INTEGRA CONSULTING, LLC. THIS IS ONLY A HOLDING COMPANY WITH NO INCOME. RR SPENDS APPROX 30 MINUTES PER MONTH ON THIS ACTIVITY. NO SALARY OR COMMISSIONS.

MAN INVESTMENTS, RIVERBANK HOUSE, 2 SWAN LANE, LONDON, EC4R 3AD, UNITED KINGDOM. PROVIDES INVESTMENT OPTIONS IN SEVERAL HEDGE FUNDS THAT WOULD OTHERWISE BE UNAVAILABLE THROUGH MY



Registration & Employment History

OTHER BUSINESS ACTIVITIES

CURRENT CUSTODIAL PLATFORM. APPROX 2 HOURS PER MONTH. NO SALARY OR COMMISSIONS.

Coquest Inc., 12222 Merit Drive suite 1130, Dallas Texas, 75251. START JULY 2021. COMMODITIES FUTURES BROKER. OFFERING MANAGE FUTURES AND HEDGING. 8 HOURS PER MONTH. PAID ONLY COMMISSIONS.

SUMMA ASSET MANAGEMENT CORP. Avenida La Rotonda y Transversal, Costa del Este, PH Prime Time Tower, Piso 12 - Oficina 12C1, Panama City, Panama. START JULY 2022. REFERENCE CLIENTS FOR INVESTMENT OUTSIDE THE USA, MEXICO AND EUROPE. TWO HOURS PER MONTH. WILL BE PAID REFERRAL FEES.



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

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:	
Date Initiated:	07/01/2019
Docket/Case Number:	2017055355301
Employing firm when activity occurred which led to the regulatory action:	TITLEIST ASSET MANAGEMENT, LTD.
Product Type:	No Product
Allegations:	Without admitting or denying the findings, de la Garza Emerich consented to the sanctions and to the entry of findings that he caused his member firm to fail to preserve books and records. The findings stated that de la Garza and his assistant, who acted at his authorization, utilized unapproved email addresses to send and receive business related communications. The email addresses were not disclosed to de la Garza Emerich's member firm and the emails sent and received were not captured by the firm.
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:	07/01/2019
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: 45 days
Start Date: 08/05/2019
End Date: 09/18/2019

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:
Date Paid by individual: 07/10/2019
Was any portion of penalty waived? No

Amount Waived:

Regulator Statement Fines paid in full on July 10, 2019.

Reporting Source: Individual
Regulatory Action Initiated By: FINRA

Sanction(s) Sought:
Date Initiated: 07/01/2019
Docket/Case Number: [2017055355301](#)



Employing firm when activity occurred which led to the regulatory action:	Titleist Asset Management, LTD.
Product Type:	No Product
Allegations:	Without admitting or denying the findings, de la Garza Emerich consented to the sanctions and to the entry of findings that he caused his member firm to fail to preserve books and records. The findings stated that de la Garza and his assistant, who acted at his authorization, utilized unapproved email addresses to send and receive business related communications. The email addresses were not disclosed to de la Garza Emerich's member firm and the emails sent and received were not captured by the firm.
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:	07/01/2019
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	All Capacities
Duration:	45 days
Start Date:	08/05/2019
End Date:	09/18/2019
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:	
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	



End of Report

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