



## IAPD Report

# John Polemis

CRD# 4270012

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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

### John Polemis (CRD# 4270012)

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 **02/24/2026**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	SPHINX INVESTMENTS LLC	CRD# 327836	07/11/2025

### 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	STIRLINGSHIRE INVESTMENTS	310576	NEW YORK CITY, NY	03/18/2024 - 09/05/2024
IA	STIRLINGSHIRE INVESTMENTS	327779	San Diego, CA	03/18/2024 - 09/05/2024
B	PARK AVENUE SECURITIES LLC	46173	SAN DIEGO, CA	04/21/2022 - 03/01/2024

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
Customer Dispute	2
Termination	1
Financial	3



## 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: **SPHINX INVESTMENTS LLC**  
Main Address: HENRICO, VA  
Firm ID#: 327836

Regulator	Registration	Status	Date
<b>IA</b> California	Investment Adviser Representative	Approved - Pending IAR CE	01/01/2026

#### Branch Office Locations

**SPHINX INVESTMENTS LLC**  
HENRICO, VA



## 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, 3 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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<b>B</b> General Securities Representative Examination (S7TO)	Series 7TO	04/19/2022
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<b>B</b> Securities Industry Essentials Examination (SIE)	SIE	03/12/2019
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<b>B</b> Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	12/09/2000
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#### State Securities Law Exams

Exam	Category	Date
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<b>IA</b> <b>B</b> Uniform Combined State Law Examination (S66)	Series 66	03/30/2021
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<b>B</b> Uniform Securities Agent State Law Examination (S63)	Series 63	12/21/2000
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### 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	03/18/2024 - 09/05/2024	STIRLINGSHIRE INVESTMENTS	CRD# 310576	NEW YORK CITY, NY
IA	03/18/2024 - 09/05/2024	STIRLINGSHIRE INVESTMENTS	CRD# 327779	San Diego, CA
B	04/21/2022 - 03/01/2024	PARK AVENUE SECURITIES LLC	CRD# 46173	SAN DIEGO, CA
IA	04/21/2022 - 03/01/2024	PARK AVENUE SECURITIES LLC	CRD# 46173	SAN DIEGO, CA
B	05/22/2001 - 09/08/2010	NYLIFE SECURITIES LLC	CRD# 5167	SAN DIEGO, CA

#### 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
12/2024 - Present	Sphinx Investments LLC	Investment Advisor	Y	Richmond, VA, United States
11/2020 - Present	Guardian Life Insurance Company	Agent	Y	San Diego, CA, United States
03/2024 - 12/2024	Stirlingshire Investments	Registered Representative	Y	NYC, NY, United States
04/2022 - 03/2024	Park Avenue Securities	Registered Representative	Y	San Diego, CA, United States
11/2019 - 11/2020	Self Employed	Insurance Broker	Y	San Diego, CA, United States
04/2019 - 10/2019	Principal Life Insurance Company	Financial Rep/Agent	Y	San Diego, CA, United States
04/2019 - 10/2019	Principal Securities Incorporated	Registered Representative	Y	San Diego, CA, United States
01/2018 - 04/2019	Allegis Advisor Group	Broker	N	South Jordan, UT, United States
03/2017 - 01/2018	VARIOUS INSURANCE CARRIERS FOR W&R INSURANCE AGENCIES	INSURANCE AGENT	Y	SAN DIEGO, CA, United States
05/2004 - 01/2018	HUMANA	COMMISSION TRAILS	N	SAN DIEGO, CA, United States



## Registration & Employment History

### EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
05/2004 - 01/2018	KAISER	COMMISSION TRAILS	N	SAN DIEGO, CA, United States
05/2004 - 01/2018	UNITED HEALTHCARE	COMMISSION TRAILS	N	SAN DIEGO, CA, United States
03/2017 - 12/2017	WADDELL & REED INC	ASSOCIATED PERSON	Y	SAN DIEGO, CA, United States
09/2014 - 06/2016	NFG BROKERAGE	SALES, INSURANCE BROKER	N	MIDVALE, 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.

Outside Insurance Sales,  
Start date: 11/25/2020,  
Address: 9920 Pacific Heights Blvd, Ste. 105 San Diego, CA 92121,  
8-10 total hours per month and 8-10 total hours during securities trading hours,  
Investment related,  
Less than 10% annual compensation,



## 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
Investigation	1
Termination	1
Financial	3

### 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

<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	NYLIFE SECURITIES LLC
<b>Allegations:</b>	THE CUSTOMERS ALLEGE THAT IN OR AROUND MARCH OF 2008 THE AGENT MADE UNAUTHORIZED TRANSACTIONS WITHOUT THEIR CONSENT OR AUTHORIZATION. CUSTOMERS ALSO ALLEGE THAT THE AGENT HAS MADE PRIOR UNAUTHORIZED TRANSACTIONS BEFORE AND THEY HAVE ASKED HIM TO STOP.
<b>Product Type:</b>	Mutual Fund
<b>Alleged Damages:</b>	\$0.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	BASED ON THE COMPANY'S GOOD FAITH ESTIMATE IT WAS DETERMINED THAT THE COMPENSATORY DAMAGES COULD BE MORE THAN \$5,000.
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	Yes
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	No

### Customer Complaint Information



**Date Complaint Received:** 06/03/2008  
**Complaint Pending?** No  
**Status:** Settled  
**Status Date:** 06/17/2009  
**Settlement Amount:** \$750.00  
**Individual Contribution Amount:** \$0.00

**Disclosure 2 of 2**

**Reporting Source:** Individual  
**Employing firm when activities occurred which led to the complaint:** NYLIFE SECURITIES INC.  
**Allegations:** CUSTOMER ALLEGED THAT AGENT "FORGED" HER NAME ON A MEDICAL RELEASE FORM.  
**Product Type:** Insurance  
**Other Product Type(s):** HEALTH INSURANCE  
**Alleged Damages:** \$0.00

**Customer Complaint Information**

**Date Complaint Received:** 09/28/2004  
**Complaint Pending?** No  
**Status:** Closed/No Action  
**Status Date:** 11/01/2004  
**Settlement Amount:**  
**Individual Contribution Amount:**

**Broker Statement** RR DENIED THE ALLEGATIONS AND CUSTOMER HAS FAILED TO PROVIDE ANY DOCUMENTATION OR INFORMATION.



## 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:** Regulator

**Initiated By:** FINRA

**Notice Date:** 02/23/2026

**Details:** Wells Notice examination #20240832642: FINRA made a preliminary determination to recommend that disciplinary action be brought against John Polemis alleging violation of FINRA Rules 3240 and 2010 for borrowing funds from a customer; violation of FINRA Rule 2010 for making material misrepresentations to obtain funds; violation of FINRA Rule 2010 for effecting transactions in a customer's non-discretionary account without the customer's prior written or oral authorization; violation of FINRA Rules 4511 and 2010 for causing a member firm to maintain inaccurate books and records; and violation of FINRA Rules 8210 and 2010 for failing to provide information and documents requested pursuant to FINRA Rule 8210.

**Is Investigation pending?** Yes



## 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:** STIRLINGSHIRE BD LLC  
**Termination Type:** Discharged  
**Termination Date:** 08/19/2024  
**Allegations:** The Firm is concerned that the registered representative failed to comply with FINRA regulations due to information from a customer representative that, before joining the Firm, the registered representative had received a loan from the customer that had not been disclosed or approved by the Firm. The Firm learned that the registered representative had connected his personal bank account with the customer's brokerage account (no evidence of transfers to this account has been identified).  
**Product Type:** No Product

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**Reporting Source:** Individual  
**Firm Name:** Sterlingshire BD LLC  
**Termination Type:** Discharged  
**Termination Date:** 08/19/2024  
**Allegations:** The Firm is concerned that the registered representative failed to comply with FINRA regulations due to information from a customer representative that, before joining the Firm, the registered representative had received a loan from the customer that had not been disclosed or approved by the Firm. The Firm learned that the registered representative had connected his personal bank account with the customer's brokerage account (no evidence of transfers to this account has been identified).  
**Product Type:** No Product

**Broker Statement** Additional information in response to the Allegations: The personal bank account alleged to have been connected to a customer's brokerage account was not established by Mr. Polemis, and in fact it was a business account not connected to Mr. Polemis. The social security number under which the account was established was not Mr. Polemis's, and he determined that the account was added by someone at Stirlingshire BD LLC. Accordingly, Mr. Polemis believes the allegations asserting the violations of industry standards of conduct were false and appear to be unsubstantiated or erroneous. However, due to the Item 14(J) requirement to disclose any allegations made involving the conduct in question (even where such allegations were not substantiated and/or are believed to be false or erroneous) and out of an abundance of caution, Mr. Polemis is including this disclosure.



## 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 3

**Reporting Source:** Individual

**Action Type:** Compromise

**Action Date:** 10/01/2018

**Organization Investment-Related?**

**Action Pending?** No

**Disposition:** Satisfied/Released

**Disposition Date:** 10/01/2018

**If a compromise with creditor, provide:**

**Name of Creditor:** JP Morgan Chase

**Original Amount Owed:** \$23,354.00

**Terms Reached with Creditor:** The JP Morgan Chase Freedom Visa Credit card balance with interest and finance charges was \$23,354.00. The settled amount was \$7,000.

**Broker Statement** This debt was incurred from my divorce that started in the fall of 2014. I took this route rather than filing bankruptcy, because my goal was to get back into my financial career.

### Disclosure 2 of 3

**Reporting Source:** Individual

**Action Type:** Compromise

**Action Date:** 10/01/2018

**Organization Investment-Related?**

**Action Pending?** No

**Disposition:** Satisfied/Released

**Disposition Date:** 12/01/2018

**If a compromise with creditor, provide:**

**Name of Creditor:** Macy's

**Original Amount Owed:** \$10,524.00

**Terms Reached with Creditor:** Settlement for Less than full balance- \$8000

**Broker Statement** This debt was incurred from my divorce that started in the fall of 2014.



The Macy's Credit card was a joint card with my ex-wife, the other two were mine. I incurred a lot of debt during the long process of the divorce. I paid it all off as best I could. In the Fall of 2018, I settled out the last 3 accounts. The Macy's balance was \$10,524 including interest and finance charges. The settled amount was \$8,000. I took this route rather than filing bankruptcy, because my goal was to get back into my financial career. As the Credit Report shows, all three of these have a \$0 balance and have been paid off.

**Disclosure 3 of 3**

**Reporting Source:** Individual  
**Action Type:** Compromise  
**Action Date:** 10/01/2018  
**Organization Investment-Related?**  
**Action Pending?** No  
**Disposition:** Satisfied/Released  
**Disposition Date:** 10/01/2018

**If a compromise with creditor, provide:**

**Name of Creditor:** NC Financial  
**Original Amount Owed:** \$5,080.00  
**Terms Reached with Creditor:** NC Financial loan was originally for \$3,000, the high interest and finance charges brought the total to \$5080.00, The settled amount was \$3,000.

**Broker Statement** This debt was incurred from my divorce that started in the fall of 2014. I took this route rather than filing bankruptcy, because my goal was to get back into my financial career



## End of Report

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