



IAPD Report

TRACY AARON ZULLO

CRD# 4293982

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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

TRACY AARON ZULLO (CRD# 4293982)

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 **01/10/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	MUTUAL SECURITIES, INC.	CRD# 13092	07/06/2017
IA	CAPITAL WEALTH INVESTMENTS	CRD# 311698	12/23/2020

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **13** 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	BERNARDO WEALTH PLANNING, LLC	288705	Scranton, PA	12/06/2017 - 02/04/2021
IA	PLATINUM WEALTH PARTNERS	145507	Scranton, PA	05/22/2017 - 12/31/2017
B	PURSHE KAPLAN STERLING INVESTMENTS	35747	Scranton, PA	05/19/2017 - 05/31/2017

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

Employment 1 of 2

Firm Name: **CAPITAL WEALTH INVESTMENTS**
Main Address: 132 ADAMS AVENUE
SCRANTON, PA 18503
Firm ID#: 311698

Regulator	Registration	Status	Date
IA Pennsylvania	Investment Adviser Representative	Approved	12/23/2020
IA Texas	Investment Adviser Representative	Restricted Approval	07/24/2023
IA Virginia	Investment Adviser Representative	Approved	01/04/2021

Branch Office Locations

CAPITAL WEALTH INVESTMENTS
132 ADAMS AVENUE
SCRANTON, PA 18503

Employment 2 of 2

Firm Name: **MUTUAL SECURITIES, INC.**
Main Address: 807-A CAMARILLO SPRINGS ROAD
CAMARILLO, CA 93012
Firm ID#: 13092

Regulator	Registration	Status	Date
B FINRA	General Securities Representative	Approved	07/06/2017
B FINRA	Operations Professional	Approved	07/06/2017
B Delaware	Agent	Approved	04/26/2019
B Florida	Agent	Approved	07/10/2017



Qualifications

Regulator	Registration	Status	Date
B Indiana	Agent	Approved	07/07/2017
B Iowa	Agent	Approved	06/19/2020
B Maryland	Agent	Approved	07/07/2017
B New Jersey	Agent	Approved	07/10/2017
B New York	Agent	Approved	07/10/2017
B North Carolina	Agent	Approved	04/12/2019
B Ohio	Agent	Approved	07/07/2017
B Pennsylvania	Agent	Approved	07/07/2017
B Texas	Agent	Approved	07/11/2017
B Virginia	Agent	Approved	07/07/2017
B Washington	Agent	Approved	07/13/2017

Branch Office Locations

MUTUAL SECURITIES, INC.
132 Adams Avenue
Scranton, PA 18503

MUTUAL SECURITIES, INC.
Leesburg, 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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Operations Professional Examination (S99TO)	Series 99TO	01/02/2023
Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
General Securities Representative Examination (S7)	Series 7	02/05/2001

State Securities Law Exams

Exam	Category	Date
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Uniform Investment Adviser Law Examination (S65)	Series 65	08/27/2002
Uniform Securities Agent State Law Examination (S63)	Series 63	02/21/2001

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	12/06/2017 - 02/04/2021	BERNARDO WEALTH PLANNING, LLC	CRD# 288705	Scranton, PA
IA	05/22/2017 - 12/31/2017	PLATINUM WEALTH PARTNERS	CRD# 145507	Scranton, PA
B	05/19/2017 - 05/31/2017	PURSHE KAPLAN STERLING INVESTMENTS	CRD# 35747	Scranton, PA
IA	01/16/2004 - 05/30/2017	WELLS FARGO CLEARING SERVICES, LLC	CRD# 19616	SCRANTON, PA
B	07/01/2003 - 05/30/2017	WELLS FARGO CLEARING SERVICES, LLC	CRD# 19616	SCRANTON, PA
B	02/06/2001 - 07/01/2003	PRUDENTIAL SECURITIES INCORPORATED	CRD# 7471	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
11/2020 - Present	Zullo Investment Group dba Capital Wealth Investments	Principal/Investment Adviser Representative	Y	Scranton, PA, United States
12/2017 - Present	Bernardo Wealth Planning d/b/a Capital Wealth Investments	Financial Adviser	Y	SCRANTON, PA, United States
06/2017 - Present	MUTUAL SECURITIES, INC.	REGISTERED REPRESENTATIVE	Y	CAMARILLO, CA, United States
05/2017 - 11/2017	Platinum Wealth Partners d/b/a Capital Wealth Advisors-Zullo Inv	IAR	Y	Scranton, PA, United States
05/2017 - 05/2017	Purshe Kaplan Sterling Investments	Registered Representative	Y	Albany, NY, United States
11/2016 - 05/2017	WELLS FARGO CLEARING SERVICES, LLC	REGISTERED REP	Y	SCRANTON, PA, United States
05/2009 - 11/2016	WELLS FARGO ADVISORS LLC	REGISTERED REP	Y	SCRANTON, PA, United States



Registration & Employment History



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. Zullo Investment Group, Inc., Corporation, Start Date: 05/16/17, 17057 Winning Colors Place Leesburg, VA 20176, Administrative Operations, Financial Advisor, Investment Related, 160 hours per month, 8 hours per day during trading hours. Registered as an IAR since 11/2020.
2. Independent Insurance Agent, Sole Proprietor, Start Date: 12/5/17, 132 Adams Avenue, Scranton, PA 18503, Insurance Agency/Agent, Not Investment Related, 2 hours per month, 0 hours per day during trading hours.
3. Symetra Life Insurance Company, Corporation, Start Date: 12/5/17, 777 108th Avenue NE, Suite 1200, Bellevue, WA 98004, Insurance Company, Agent, Not Investment Related, 2 hours per month, 0 hours per day during trading hours.
4. Nationwide Insurance Company, Corporation, Start date: 01/24/18, One Nationwide Plaza, Columbus, OH 43215, Insurance Agency/Agent, 5 hours per month, 0 hours per day during trading hours.
5. BKA Financial, LLC, START DATE: 01/24/18, 244 W. Water St., Ste. 200 Elmira, NY 14901, Insurance Agency/Agent, Not Investment Related, 5 hours per month, 0 hours per day during trading hours.
6. The Zullo Investment Group DBA Capital Wealth Investments, Start Date: 01/01/2021, 132 Adams Ave, Scranton, PA 18503, RIA Registered Investment, RIA, Managing Director, We are currently under the umbrella of Bernardo Wealth Planning RIA - we would now like to become our own RIA, Investment Related, 40 Hours per month, 40 Hours during trading hours.



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	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 3

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	WELLS FARGO ADVISORS, LLC
Allegations:	ATTORNEY ALLEGES "GROSS NEGLIGENCE ON THE PART OF THE FINANCIAL ADVISOR, MORE SPECIFICALLY THE USE OF FALSE INFORMATION IN CLIENT'S APPLICATION, UNAUTHORIZED TRADING AND LACK OF FULL DISCLOSURE WITH REGARD TO OPTIONS AND/OR MARGIN TRADING." (8/13/2003-3/31/2012)
Product Type:	Other: MISCELLANEOUS
Alleged Damages:	\$0.00
Alleged Damages Amount Explanation (if amount not exact):	AMOUNT OF DAMAGES ARE UNDISCLOSED, BUT AFTER A GOOD-FAITH DETERMINATION, REASONABLY BELIEVED TO EXCEED \$5,000.
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:	04/20/2012
Complaint Pending?	No
Status:	Denied



Status Date: 05/14/2012

Settlement Amount:

Individual Contribution Amount:

Disclosure 2 of 3

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: WACHOVIA SECURITIES, LLC

Allegations: PA CLIENT PURCHASED A JOHN HANCOCK VENTURE VANTAGE VARIABLE ANNUITY IN SEPTEMBER 2001. CLIENT ALLEGES THAT HER ADVISOR SUGGESTED WITHDRAWING GAINS ON THE ANNUITY IN FEBRUARY 2005 AND JANUARY 2006 STATING THAT SHE WOULD NOT INCUR A PENALTY FOR THE WITHDRAW AND WOULD INCUR ONLY A SMALL TAX LIABILITY. CLIENT STATES THAT SHE SUFFERED A \$13,000 LIABILITY DUE TO THE WITHDRAWALS.

Product Type: Annuity(ies) - Variable

Alleged Damages: \$13,000.00

Customer Complaint Information

Date Complaint Received: 03/09/2006

Complaint Pending? No

Status: Settled

Status Date: 04/17/2006

Settlement Amount: \$15,000.00

Individual Contribution Amount: \$7,500.00

Broker Statement SETTLED IN THE INTEREST OF CLIENT RELATIONS AND TO AVOID COSTLY AND TIME-CONSUMING FORMAL PROCEEDINGS, WITHOUT ADMITTING LIABILITY, IN THE AMOUNT OF \$15,000.

Disclosure 3 of 3

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: PRUDENTIAL SECURITIES INC

Allegations: CLIENTS ALLEGE UNAUTHORIZED TRADING REGARDING THE SWITCH OF PRUDENTIAL HIGH YEILD CLASS A SHARES TO PURCHASE FRANKLIN CUSTODIAN FUNDS, INC. CLASS C SHARES

Product Type: Mutual Fund(s)

Alleged Damages: \$5,000.00

Customer Complaint Information

Date Complaint Received: 08/05/2002

Complaint Pending? No



Status: Closed/No Action

Status Date: 10/08/2002

Settlement Amount:

Individual Contribution Amount:

Broker Statement

AFTER DISCUSSION WITH THE CLIENT, THE CLIENT ELECTED TO KEEP THE FRANKLIN FUND AND NOT PURSUE THE MATTER FURTHER.



End of Report

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