IAPD Report

JAMES MARTIN STARNES

CRD# 4309891

Section Title	Page(s)

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

JAMES MARTIN STARNES (CRD# 4309891)

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 **04/28/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	CETERA ADVISORS LLC	CRD# 10299	04/30/2021
IA	CETERA INVESTMENT ADVISERS LLC	CRD# 105644	03/21/2024

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **51** 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	CETERA ADVISORS LLC	10299	Woodlands, TX	04/30/2021 - 03/21/2024
B	MML INVESTORS SERVICES, LLC	10409	HOUSTON, TX	03/25/2017 - 04/30/2021
IA	MML INVESTORS SERVICES, LLC	10409	HOUSTON, TX	03/25/2017 - 04/30/2021

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
Customer Dispute	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 **51** jurisdiction(s) and 1 SRO(s) through his or her employer(s).

Employment 1 of 2

Firm Name: **CETERA ADVISORS LLC**

Main Address: 5299 DTC BLVD #800
GREENWOOD VILLAGE, CO 80111

Firm ID#: 10299

	Regulator	Registration	Status	Date
B	FINRA	General Securities Representative	Approved	04/30/2021
B	FINRA	General Securities Sales Supervisor	Approved	04/30/2021
B	FINRA	Municipal Securities Representative	Approved	04/30/2021
B	Alabama	Agent	Approved	04/30/2021
B	Alaska	Agent	Approved	04/30/2021
B	Arizona	Agent	Approved	04/30/2021
B	Arkansas	Agent	Approved	04/30/2021
B	California	Agent	Approved	04/30/2021
B	Colorado	Agent	Approved	04/30/2021
B	Connecticut	Agent	Approved	04/30/2021
B	Delaware	Agent	Approved	01/02/2025
B	District of Columbia	Agent	Approved	04/30/2021
B	Florida	Agent	Approved	04/30/2021

Qualifications

	Regulator	Registration	Status	Date
B	Georgia	Agent	Approved	04/30/2021
B	Hawaii	Agent	Approved	04/30/2021
B	Illinois	Agent	Approved	05/13/2021
B	Indiana	Agent	Approved	04/30/2021
B	Iowa	Agent	Approved	04/30/2021
B	Kansas	Agent	Approved	04/30/2021
B	Kentucky	Agent	Approved	04/30/2021
B	Louisiana	Agent	Approved	04/30/2021
B	Maine	Agent	Approved	01/04/2023
B	Maryland	Agent	Approved	04/30/2021
B	Massachusetts	Agent	Approved	01/02/2025
B	Michigan	Agent	Approved	04/30/2021
B	Minnesota	Agent	Approved	04/30/2021
B	Mississippi	Agent	Approved	04/30/2021
B	Missouri	Agent	Approved	04/30/2021
B	Montana	Agent	Approved	04/30/2021
B	Nebraska	Agent	Approved	04/30/2021
B	Nevada	Agent	Approved	04/30/2021
B	New Hampshire	Agent	Approved	04/30/2021

Qualifications

	Regulator	Registration	Status	Date
B	New Jersey	Agent	Approved	04/30/2021
B	New Mexico	Agent	Approved	04/30/2021
B	New York	Agent	Approved	04/30/2021
B	North Carolina	Agent	Approved	05/01/2021
B	North Dakota	Agent	Approved	04/30/2021
B	Ohio	Agent	Approved	04/30/2021
B	Oklahoma	Agent	Approved	04/30/2021
B	Oregon	Agent	Approved	04/30/2021
B	Pennsylvania	Agent	Approved	04/30/2021
B	Puerto Rico	Agent	Approved	04/25/2023
B	Rhode Island	Agent	Approved	01/02/2025
B	South Carolina	Agent	Approved	04/30/2021
B	South Dakota	Agent	Approved	01/04/2023
B	Tennessee	Agent	Approved	01/13/2026
B	Texas	Agent	Approved	04/30/2021
B	Utah	Agent	Approved	04/30/2021
B	Virgin Islands	Agent	Approved	01/04/2023
B	Virginia	Agent	Approved	04/30/2021
B	Washington	Agent	Approved	05/03/2021

Qualifications

	Regulator	Registration	Status	Date
B	West Virginia	Agent	Approved	01/02/2025
B	Wisconsin	Agent	Approved	04/30/2021
B	Wyoming	Agent	Approved	04/30/2021

Branch Office Locations

CETERA ADVISORS LLC
701 NORTH POST OAK RD
SUITE 320
HOUSTON, TX 77024

CETERA ADVISORS LLC
SPRING, TX

Employment 2 of 2

Firm Name: **CETERA INVESTMENT ADVISERS LLC**

Main Address: 1450 AMERICAN LANE
6TH FLOOR, SUITE 650
SCHAUMBURG, IL 60173-2096

Firm ID#: 105644

	Regulator	Registration	Status	Date
IA	Texas	Investment Adviser Representative	Approved	03/21/2024

Branch Office Locations

CETERA INVESTMENT ADVISERS LLC
701 NORTH POST OAK RD
SUITE 320
HOUSTON, TX 77024

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 2 state securities law exams.

Principal/Supervisory Exams

	Exam	Category	Date
B	General Securities Sales Supervisor - General Module Examination (S10)	Series 10	05/19/2003
B	General Securities Sales Supervisor - Options Module Examination (S9)	Series 9	04/09/2003

General Industry/Product Exams

	Exam	Category	Date
B	Municipal Securities Representative Examination (S52TO)	Series 52TO	01/02/2023
B	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
B	National Commodity Futures Examination (S3)	Series 3	06/02/2003
B	General Securities Representative Examination (S7)	Series 7	12/21/2000

State Securities Law Exams

	Exam	Category	Date
IA	Uniform Investment Adviser Law Examination (S65)	Series 65	01/17/2001
B	Uniform Securities Agent State Law Examination (S63)	Series 63	01/05/2001

PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **1** professional designation(s).

Certified Financial Planner

Only professional designations listed in Question 8 of the Form U4 will appear in this section if the appropriate box is checked and verified by the issuing organization at the time of the filing. Learn more about eligible designations at IARD and NASAA.

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	04/30/2021 - 03/21/2024	CETERA ADVISORS LLC	CRD# 10299	Woodlands, TX
B	03/25/2017 - 04/30/2021	MML INVESTORS SERVICES, LLC	CRD# 10409	HOUSTON, TX
IA	03/25/2017 - 04/30/2021	MML INVESTORS SERVICES, LLC	CRD# 10409	HOUSTON, TX
IA	09/10/2014 - 03/25/2017	MSI FINANCIAL SERVICES, INC.	CRD# 14251	HOUSTON, TX
B	06/27/2014 - 03/25/2017	MSI FINANCIAL SERVICES, INC.	CRD# 14251	HOUSTON, TX
IA	09/10/2014 - 01/02/2015	NEW ENGLAND SECURITIES CORPORATION	CRD# 615	HOUSTON, TX
B	06/27/2014 - 01/02/2015	NEW ENGLAND SECURITIES	CRD# 615	HOUSTON, TX
IA	11/18/2013 - 07/10/2014	UBS FINANCIAL SERVICES INC.	CRD# 8174	DALLAS, TX
B	09/29/2010 - 07/10/2014	UBS FINANCIAL SERVICES INC.	CRD# 8174	DALLAS, TX
B	06/01/2009 - 10/08/2010	MORGAN STANLEY SMITH BARNEY	CRD# 149777	ST. PETERSBURG, FL
IA	06/01/2009 - 10/08/2010	MORGAN STANLEY SMITH BARNEY LLC	CRD# 149777	ST. PETERSBURG, FL
B	12/22/2000 - 06/01/2009	CITIGROUP GLOBAL MARKETS INC.	CRD# 7059	BATON ROUGE, LA
IA	12/22/2000 - 06/01/2009	CITIGROUP GLOBAL MARKETS INC.	CRD# 7059	BATON ROUGE, LA

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
04/2025 - Present	TOTUS ASSET MANAGEMENT, LLC	INVESTMENT ADVISORY REPRESENTATIVE/ OWNER	Y	HOUSTON, TX, United States

Registration & Employment History

EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
09/2024 - Present	TOTUS ASSET MANAGEMENT, LLC	OWNER/PRESIDENT & CEO	Y	HOUSTON, TX, United States
03/2024 - Present	CETERA INVESTMENT ADVISERS LLC	INVESTMENT ADVISOR REPRESENTATIVE	Y	SCHAUMBURG, IL, United States
05/2023 - Present	TOTUS STRATEGY PARTNERS, LLC	OWNER	Y	HOUSTON, TX, United States
04/2023 - Present	TOTUS BUSINESS SOLUTIONS, LLC	OWNER	N	HOUSTON, TX, United States
04/2023 - Present	TOTUS INSURED SOLUTIONS, LLC	OWNER	Y	HOUSTON, TX, United States
11/2021 - Present	TOTUS INSURANCE AGENCY, LLC	OWNER	Y	THE WOODLANDS, TX, United States
04/2021 - Present	CETERA ADVISORS LLC	REGISTERED REPRESENTATIVE	Y	ST CLOUD, MN, United States
04/2021 - Present	TOTUS FINANCIAL GROUP, INC	OWNER	Y	THE WOODLANDS, TX, United States
04/2021 - Present	TOTUS WEALTH MANAGEMENT, LLC	OWNER	Y	THE WOODLANDS, TX, United States
02/2021 - Present	GULF STATES FINANCIAL GROUP, INC	OWNER	Y	THE WOODLANDS, TX, United States
11/2019 - Present	GULF COAST PROPERTY & CASUALTY LLC	OWNER	N	THE WOODLANDS, TX, United States
06/2018 - Present	TEXAS GULF COAST INSURANCE AGENCY LLC	OWNER	Y	THE WOODLANDS, TX, United States
01/2018 - Present	STARNES FAMILY VENTURES LLC	PARTNER	N	MISSOULA, MT, United States
08/2016 - Present	TEXAS GULF COAST FINANCIAL GROUP LLC	OWNER	Y	THE WOODLANDS, TX, United States
05/2016 - Present	STARNES BROTHERS HOLDING, INC	OWNER	N	THE WOODLANDS, TX, United States
05/2016 - Present	STARNES HOLDINGS, INC	OWNER	N	THE WOODLANDS, TX, United States
01/2015 - Present	THE STARNES GROUP, INC	OWNER	N	WILLSTON, FL, United States
08/2016 - 09/2024	JAMES STARNES	OWNER	Y	THE WOODLANDS, TX, United States
07/2016 - 04/2021	MML INVESTORS SERVICES, LLC	Mass Transfer	Y	HOUSTON, TX, United States

Registration & Employment History

EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
06/2014 - 04/2021	METLIFE SECURITIES	MARKET LEADER	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.

1)FIXED INS WITH VARIOUS COMPANIES, INVST RLTD, REGIS LOCATION, FIXED INS, 1/2001, AGENT, APX # OF HRS/WK & DUR TRD HRS: VARIES, SELLS LIFE, HEALTH, DISABILITY, ANNUITIES, LTC, P & C; 2) TOTUS WEALTH MGMT, LLC, INVST RLTD, REGIS LOCATION, FINANCIAL SERVICES, 5/2021, OWNER, APX # OF HRS/WK: 40, 32.5 DURING TRADING HRS; DBA FOR FINANCIAL SERVICES; 3) TOTUS FINANCIAL GROUP, INC, INVST RLTD, REGIS LOCATION, EXPENSE MGMT, 5/2021, OWNER, HRS/WK: 2, MAY BE DUR TRD HRS, EXPENSE MANAGEMENT & OPERATIONAL SUPPORT; 4) TEXAS GULF COAST INSURANCE AGENCY LLC, INVST RLTD, REGIS LOCATION, FIXED INS, 6/2018, OWNER; HRS/WK: 1, DUR TRD HRS, DBA FOR FIXED INSUR 5) TEXAS GULF COAST FINANCIAL GROUP LLC, INVST RLTD, REGIS LOCATION, FINANCIAL SERVICES, 8/2016, OWNER, HRS/WK: 30, DUR TRD HRS, DBA FOR FINANCIAL SERVICES; 6) GULF STATES FINANCIAL GROUP, INC, INVST RLTD, REGISTERED LOCATION, FINANCIAL SERVICES, 2/21, OWNER, APX # OF HRS/WK: 30, DUR TRD HRS, FINANCIAL SERVICES, SECURITIES, LIFE, DI, P & C; 7) STARNES FAMILY VENTURES LLC, NOT INVST RLTD, 725 SW HIGGINS AVE, STE C, MISSOULA, MT, 59803, LLC, 1/2018, PARTNER, APX 1 HR/WK, MAY BE DUR TRD HRS, OPERATING ENTITY ENGAGED IN THE OWNERSHIP, SALE, & LEASING OF BOATS, RECREATIONAL VEHICLES, AUTOMOBILES; 8) THE STARNES GROUP, INC, NOT INVST RLTD, 119 E NOBLE AVE, WILLISTON, FL, 32696, CORP, 1/2015, OWNER, APX 1 HRS/WK, MAY BE DUR TRD HRS, OPERATION ENTITY FOR PERSONAL BUSINESS, CURRENTLY OWNS EQUIPMENT, AUTOMOBILES & FLORAL BUSINESS, DBA THE PEDDLER FLORAL; 9) GULF COAST PROPERTY & CASUALTY LLC, NOT INVST RLTD, REGISTERED LOCATION, P & C, 11/2019, OWNER, APX # OF HRS/WK: 1 MAY BE DUR TRD HRS, P & C BUSINESS, DBA GULF COAST HOME & AUTO; 10) STARNES BROTHERS HOLDING, INC, NOT INVST RLTD, REGISTERED LOCATION, REAL ESTATE, 5/2016, OWNER, APX 1 HR/WK, MAY BE DUR TRD HRS, HOLD CO FOR FAMILY OWNED PROPERTY; 11)STARNES HOLDINGS, INC, NOT INVST RLTD, REGISTERED LOCATION, REAL ESTATE, 5/2016, OWNER, APX 1 HOUR PER WEEK, MAY BE DUR TRD HRS, HOLDING COMPANY FOR FAMILY RE ASSETS; 12) N/A, NOT INVST RLTD, REGISTERED LOCATION, TRUST, 6/2010, TRUSTEE, APX # OF HRS/WK: 1, MAY BE DUR TRD HRS, TRUSTEE OF FAMILY TRUST; 13) JSTARNES RD LLC, INVST RLTD, 4411 CHATEAU CREEK WAY, SPRING TX, 77386, HOLD CO, 1/2020, INVESTOR, APX 1 HR/WK, MAY BE DUR TRD HRS, HOLDS DIVIDEND & PROFIT FROM PRIVATE RE FUND; 14) LIFE SETTLEMENT BUSINESS, NOT INVST RLTD; REGISTERED LOCATION, LIFE SETTLEMENT, 11/2021, APX # OF HRS/WK: VARIES, DUR TRD HRS, INSURANCE AGENT, SELLS LIFE SETTLEMENTS THROUGH WELCOME FUNDS, INC; 15) TOTUS INSURANCE AGENCY, LLC, INVST RLTD; REGISTERED LOCATION, FIXED INSURANCE, 11/2021, OWNER, HRS/WK: 5, MAY BE DUR TRD HRS DBA FOR FIXED INSURANCE 16)ANCHOR ACCOUNTING; NOT INV RLTD; REGISTERED LOCATION; TAX SERVICES REFERRAL; 4/2023; REFERRER; APX # OF& DUR TRD HRS: 2; ERC TAX CREDITS, TAX SVCS WITH ANCHOR ACCOUNTING; 17)TOTUS BUSINESS SOLUTIONS, LLC; NOT INV RLTD; REGISTERED LOCATION; BUS SOLUTIONS; 4/2023; OWNER; APX # OF HRS/WK & DUR TRD HRS: 2; OFFER GROUP LIFE, LIFE, GROUP HEALTH, PAYROLL, & BUS. SOFTWARE FOR BUSINESS OWNERS; 18)TOTUS STRATEGY PARTNERS, LLC; INV RLTD; REGISTERED LOCATION; FIXED INSURANCE SERVICES; 5/2023; OWNER; APX # OF HRS/WK & DUR TRD HRS: 2; SALE & SVC FOR FIXED LIFE, FIXED ANNUITY, DIA, SPIA, AND LTC; 19) TOTUS INSURED SOLUTIONS, LLC; INST RLTD; REGISTERED LOCATION; INS DBA; 4/2023; OWNER; 2 HRS/WK & DUR TRD HRS; INS DBA 20) GULF COAST WEALTH MANAGEMENT, LLC; INV REL: NO; REGISTERED LOCATION; FOR MARKETING;02/2018; MANAGING MBR; 1; 1; MARKETING BRAND ; 21) TOTUS ASSET MGMT, LLC, INVS REL, REGS LOCATION, OPERATING ENTITY, STARTED: 01/2025, OWNER, PRES, 5 HOUR PER WK, OPERATING ENTITY FOR RIA; 22) NAME OF OTHER BUSINESS: TOTUS ASSET MANAGEMENT, LLC,
INVS RELATED, REGISTERED LOCATION, ADVISORY SERVICES: INVESTMENT ADVISORY REPRESENTATIVE/ OWNER, STARTED: 04/2025, APX HOURS PER 40, APX HOURS: 32.5, FINANCIAL PLANNING, ASSET MANAGEMENT & THIRD

Registration & Employment History

OTHER BUSINESS ACTIVITIES

PARTY MONEY MGMT;
23) Rental 2823 Garrison Tr. TX 77386

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	1

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 1

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	CITIGROUP GLOBAL MARKET INC
Allegations:	CLIENT ALLEGED UNSUITABLE PORTFOLIO ALLOCATION - 2002. DAMAGES UNSPECIFIED.
Product Type:	Equity Listed (Common & Preferred Stock)
Alleged Damages:	

Customer Complaint Information

Date Complaint Received:	04/29/2003
Complaint Pending?	No
Status:	Denied
Status Date:	04/14/2004
Settlement Amount:	
Individual Contribution Amount:	
Broker Statement	CLAIM DENIED.

End of Report

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