



IAPD Report

ALISON MARIE JANKE

CRD# 4409155

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Qualifications	2 - 5
Registration and Employment History	6 - 8
Disclosure Information	9



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

ALISON MARIE JANKE (CRD# 4409155)

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 **02/10/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	CETERA WEALTH SERVICES, LLC	CRD# 13572	08/23/2019
IA	CETERA INVESTMENT ADVISERS LLC	CRD# 105644	04/12/2023

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **30** 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 ADVISOR NETWORKS LLC	13572	PORT RICHEY, FL	03/22/2021 - 06/29/2023
IA	SUMMIT FINANCIAL GROUP INC	109485	PORT RICHEY, FL	05/06/2011 - 05/20/2021
B	SUMMIT BROKERAGE SERVICES, INC.	34643	PORT RICHEY, FL	04/15/2011 - 09/20/2019

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



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

Employment 1 of 2

Firm Name: **CETERA WEALTH SERVICES, LLC**

Main Address: 2301 ROSECRANS AVE #5100
EL SEGUNDO, CA 90245

Firm ID#: 13572

	Regulator	Registration	Status	Date
B	FINRA	General Securities Representative	Approved	08/23/2019
B	Alaska	Agent	Approved	12/21/2022
B	Arizona	Agent	Approved	08/22/2025
B	California	Agent	Approved	09/20/2019
B	Colorado	Agent	Approved	09/20/2019
B	Connecticut	Agent	Approved	03/12/2020
B	Florida	Agent	Approved	09/13/2019
B	Georgia	Agent	Approved	09/20/2019
B	Idaho	Agent	Approved	02/10/2026
B	Illinois	Agent	Approved	02/23/2023
B	Indiana	Agent	Approved	09/20/2019
B	Iowa	Agent	Approved	05/23/2025
B	Kentucky	Agent	Approved	09/20/2019



Qualifications

	Regulator	Registration	Status	Date
B	Maine	Agent	Approved	11/17/2025
B	Maryland	Agent	Approved	09/20/2019
B	Massachusetts	Agent	Approved	07/14/2025
B	Michigan	Agent	Approved	10/19/2020
B	New Hampshire	Agent	Approved	11/01/2019
B	New Jersey	Agent	Approved	09/20/2019
B	New York	Agent	Approved	09/20/2019
B	North Carolina	Agent	Approved	09/20/2019
B	Ohio	Agent	Approved	09/20/2019
B	South Carolina	Agent	Approved	07/17/2020
B	South Dakota	Agent	Approved	12/07/2022
B	Tennessee	Agent	Approved	08/27/2024
B	Texas	Agent	Approved	09/20/2019
B	Vermont	Agent	Approved	06/13/2025
B	Virginia	Agent	Approved	09/20/2019
B	Washington	Agent	Approved	12/06/2022
B	West Virginia	Agent	Approved	09/20/2019
B	Wisconsin	Agent	Approved	01/09/2023

Branch Office Locations



Qualifications

CETERA ADVISOR NETWORKS LLC

5545 PASCO WAY
PORT RICHEY, FL 34668

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	Florida	Investment Adviser Representative	Approved	04/12/2023
IA	Texas	Investment Adviser Representative	Restricted Approval	06/29/2023

Branch Office Locations

CETERA INVESTMENT ADVISERS LLC

5545 PASCO WAY
PORT RICHEY, FL 34668



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
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No information reported.

General Industry/Product Exams

Exam	Category	Date
B Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
B General Securities Representative Examination (S7)	Series 7	08/22/2001

State Securities Law Exams

Exam	Category	Date
IA B Uniform Combined State Law Examination (S66)	Series 66	09/24/2001



PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **0** professional designation(s).

No information reported.

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	03/22/2021 - 06/29/2023	CETERA ADVISOR NETWORKS LLC	CRD# 13572	PORT RICHEY, FL
IA	05/06/2011 - 05/20/2021	SUMMIT FINANCIAL GROUP INC	CRD# 109485	PORT RICHEY, FL
B	04/15/2011 - 09/20/2019	SUMMIT BROKERAGE SERVICES, INC.	CRD# 34643	PORT RICHEY, FL
IA	03/02/2007 - 04/20/2011	WELLS FARGO ADVISORS, LLC	CRD# 19616	HOLIDAY, FL
B	02/28/2007 - 04/20/2011	WELLS FARGO ADVISORS, LLC	CRD# 19616	HOLIDAY, FL
IA	08/24/2001 - 03/02/2007	MORGAN KEEGAN & COMPANY, INC.	CRD# 4161	TAMPA, FL
B	08/23/2001 - 03/02/2007	MORGAN KEEGAN & COMPANY, INC.	CRD# 4161	TAMPA, FL

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
08/2023 - Present	Flow Yoga LLC	OWNER	N	PORT RICHEY, FL, United States
03/2023 - Present	CETERA INVESTMENT ADVISERS LLC	INVESTMENT ADVISOR REPRESENTATIVE	Y	SCHAUMBURG, IL, United States
09/2019 - Present	CETERA WEALTH SERVICES, LLC	REGISTERED REPRESENTATIVE	Y	EL SEGUNDO, CA, United States
04/2011 - 05/2021	SUMMIT FINANCIAL GROUP INC	IA REP	Y	PORT RICHEY, FL, United States
04/2011 - 09/2019	SUMMIT BROKERAGE SERVICES	REG REP	Y	PORT RICHEY, FL, 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) NAME OF OTHER BUSINESS: REVOCABLE TRUST ;
INVESTMENT RELATED: NO
ADDRESS: SAME AS REGISTERED LOCATION
NATURE OF BUSINESS: RENTAL PROPERTIES ;
START DATE: 11/2018 ;
APX NUMBER OF HOURS PER WEEK: VARIES
APX NUMBER OF HOURS DURING TRADING HOURS: VARIES
POSITION/TITLE/RELATIONSHIP: OWNER ;
BRIEF DESCRIPTION OF DUTIES: TRUST OWNS MULTIPLE RENTAL PROPERTIES ;

(2) FIXED INSURANCE - 2 HOURS A MONTH DURING TRADING HOURS.

(3) NAME OF OTHER BUSINESS: RJ WEALTH MANAGEMENT GROUP ;
INVESTMENT RELATED: YES ;
ADDRESS: SAME AS REGISTERED LOCATION ;
NATURE OF BUSINESS: DBA FOR TAX PURPOSES ;
POSITION/TITLE/RELATIONSHIP: OWNER ;
START DATE: 04/2011 ;
APX NUMBER OF HOURS PER WEEK: MINIMAL ;
APX NUMBER OF HOURS DURING TRADING HOURS: MINIMAL ;
BRIEF DESCRIPTION OF DUTIES: DBA FOR BANKING AND TAX PURPOSES ONLY ;

(4) NAME OF OTHER BUSINESS: N/A ;
INVESTMENT RELATED: NO ;
ADDRESS: SAME AS REGISTERED LOCATION
NATURE OF BUSINESS: NOTARY ;
POSITION/TITLE/RELATIONSHIP: NOTARY PUBLIC ;
START DATE: 01/2012 ;
APX NUMBER OF HOURS PER WEEK: LESS THAN 1 ;
APX NUMBER OF HOURS DURING TRADING HOURS: LESS THAN 1 ;
BRIEF DESCRIPTION OF DUTIES: NOTARIZING DOCUMENTS FOR CLIENTS WHEN NECESSARY ;

(5) NAME OF OTHER BUSINESS: SUMMIT FINANCIAL NETWORKS ;
INVESTMENT RELATED: YES;
ADDRESS: SAME AS REGISTERED LOCATION;
NATURE OF BUSINESS: FINANCIAL SERVICES;
START DATE: 2011;
POSITION/TITLE/RELATIONSHIP: FINANCIAL PROFESSIONAL;
APX NUMBER OF HOURS PER WEEK: 60;
APX NUMBER OF HOURS DURING TRADING HOURS: 32.5;
BRIEF DESCRIPTION OF DUTIES: DBA FOR FINANCIAL SERVICES;

(6) NAME OF OTHER BUSINESS: Flow Yoga LLC
INVESTMENT RELATED: NO,
ADDRESS: 7711 GRAND BLVD, PORT RICHEY, FL, 34668,
NATURE OF BUSINESS: FITNESS STUDIO,
START DATE: 02/2023,
POSITION/TITLE/RELATIONSHIP: OWNER,
APX NUMBER OF HOURS PER WEEK: 5,
APX NUMBER OF HOURS DURING TRADING HOURS: VARIES,



Registration & Employment History



OTHER BUSINESS ACTIVITIES

BRIEF DESCRIPTION OF DUTIES: OWN AND OPERATE YOGA STUDIO;



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

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:	Other: N/A
Date Initiated:	11/05/2012
Docket/Case Number:	2011030660801
Employing firm when activity occurred which led to the regulatory action:	WELLS FARGO ADVISORS, LLC
Product Type:	Other: REAL ESTATE INVESTMENT TRUST (REIT)
Allegations:	NASD RULES 2110, 3040 - ALISON JANKE PARTICIPATED IN A PRIVATE SECURITIES TRANSACTION WITHOUT PROVIDING PRIOR WRITTEN NOTICE TO HER MEMBER FIRM. JANKE REFERRED A CUSTOMER TO A REGISTERED REPRESENTATIVE AT A DIFFERENT FIRM WHERE THE CUSTOMER INVESTED \$200,000 IN A REAL ESTATE INVESTMENT TRUST (REIT). JANKE NOT ONLY REFERRED THE CUSTOMER TO ANOTHER REPRESENTATIVE BUT ALSO ATTENDED THE MEETING WITH THE CUSTOMER AND OTHER REPRESENTATIVE AND ASSISTED WITH THE COMPLETION OF THE PURCHASE TRANSACTION. A LIMITED LIABILITY COMPANY OWNED BY JANKE RECEIVED A \$6,600 PAYMENT IN CONNECTION WITH THE SALE OF A REIT.
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:

11/05/2012

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: ANY CAPACITY
Duration: THREE MONTHS
Start Date: 12/03/2012
End Date: 03/02/2013

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)
Total Amount: \$11,600.00
Portion Levied against individual: \$11,600.00
Payment Plan:
Is Payment Plan Current:
Date Paid by individual: 06/10/2014
Was any portion of penalty waived? No

Amount Waived:

Regulator Statement WITHOUT ADMITTING OR DENYING THE FINDINGS, JANKE CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, SHE IS FINED \$11,600, WHICH INCLUDES THE DISGORGEMENT OF FINANCIAL BENEFIT RECEIVED OF \$6,600, AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY FOR THREE MONTHS. THE SUSPENSION IS IN EFFECT FROM DECEMBER 3, 2012 THROUGH MARCH 2, 2013. FINE PAID JUNE 10, 2014.

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Reporting Source: Individual
Regulatory Action Initiated By: FINRA
Sanction(s) Sought: Other: N/A



Date Initiated:	11/05/2012
Docket/Case Number:	2011030660801
Employing firm when activity occurred which led to the regulatory action:	WELLS FARGO ADVISORS, LLC
Product Type:	Other: REAL ESTATE INVESTMENT TRUST (REIT)
Allegations:	NASD RULES 2110, 3040 - ALISON JANKE PARTICIPATED IN A PRIVATE SECURITIES TRANSACTION WITHOUT PROVIDING PRIOR WRITTEN NOTICE TO HER MEMBER FIRM. JANKE REFERRED A CUSTOMER TO A REGISTERED REPRESENTATIVE AT A DIFFERENT FIRM WHERE THE CUSTOMER INVESTED \$200,000 IN A REAL ESTATE INVESTMENT TRUST (REIT). JANKE NOT ONLY REFERRED THE CUSTOMER TO ANOTHER REPRESENTATIVE BUT ALSO ATTENDED THE MEETING WITH THE CUSTOMER AND OTHER REPRESENTATIVE AND ASSISTED WITH THE COMPLETION OF THE PURCHASE TRANSACTION. A LIMITED LIABILITY COMPANY OWNED BY JANKE RECEIVED A \$6,600 PAYMENT IN CONNECTION WITH THE SALE OF A REIT.
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:	11/05/2012
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	ANY CAPACITY
Duration:	THREE MONTHS
Start Date:	12/03/2012
End Date:	03/02/2013
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$11,600.00
Portion Levied against individual:	\$11,600.00
Payment Plan:	
Is Payment Plan Current:	
Date Paid by individual:	
Was any portion of penalty waived?	No

**Amount Waived:****Broker Statement**

WITHOUT ADMITTING OR DENYING THE FINDINGS, JANKE CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, SHE IS FINED \$11,600, WHICH INCLUDES THE DISGORGEMENT OF FINANCIAL BENEFIT RECEIVED OF \$6,600, AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY FOR THREE MONTHS. THE SUSPENSION IS IN EFFECT FROM DECEMBER 3, 2012 THROUGH MARCH 2, 2013.

Disclosure 2 of 2**Reporting Source:**

Regulator

Regulatory Action Initiated By:

FINRA

Sanction(s) Sought:

Other: N/A

Date Initiated:

04/12/2012

Docket/Case Number:[2011027400401](#)**Employing firm when activity occurred which led to the regulatory action:**

MORGAN KEEGAN & COMPANY, INC./WELLS FARGO ADVISORS, LLC

Product Type:

No Product

Allegations:

FINRA RULE 2010, NASD RULES 2110, 2370 - ALISON JANKE BORROWED \$100,000 FROM A CUSTOMER BASED UPON A PERSONAL RELATIONSHIP SHE HAD WITH THE CUSTOMER OUTSIDE OF THE BROKER/CUSTOMER RELATIONSHIP CONTRARY TO HER MEMBER FIRM'S WRITTEN SUPERVISORY PROCEDURES THAT ONLY ALLOWED REGISTERED REPRESENTATIVES TO ACCEPT LOANS FROM CUSTOMERS UNDER LIMITED CIRCUMSTANCES. THE FIRM'S WRITTEN SUPERVISORY PROCEDURES PROVIDED THAT A REGISTERED PERSON MUST RECEIVE PRIOR WRITTEN FIRM APPROVAL BEFORE ACCEPTING A LOAN BASED ON A PERSONAL RELATIONSHIP OUTSIDE OF THE BROKER/CUSTOMER RELATIONSHIP. JANKE DID NOT SEEK OR OBTAIN APPROVAL. WHEN JANKE BECAME ASSOCIATED WITH ANOTHER MEMBER FIRM, THE CUSTOMER TRANSFERRED HER ACCOUNT TO THE NEW FIRM. IN COMPLIANCE QUESTIONNAIRES, JANKE'S NEW FIRM REQUESTED SHE STATE WHETHER SHE HAD EVER BORROWED MONEY FROM A CUSTOMER AND SHE FALSELY ANSWERED "NO." THE CUSTOMER COMPLAINED REGARDING JANKE'S FAILURE TO TIMELY REPAY THE LOAN. THE CUSTOMER AND JANKE ENTERED INTO A SETTLEMENT AGREEMENT REGARDING THE OUTSTANDING AMOUNTS OWED.

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:

04/12/2012

Sanctions Ordered:

Civil and Administrative Penalty(ies)/Fine(s)



Suspension

No

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?

(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: ANY CAPACITY
Duration: SIX MONTHS
Start Date: 05/07/2012
End Date: 11/06/2012

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)
Total Amount: \$7,500.00
Portion Levied against individual: \$7,500.00
Payment Plan:
Is Payment Plan Current: Yes
Date Paid by individual: 04/09/2013
Was any portion of penalty waived? No

Amount Waived:

Regulator Statement WITHOUT ADMITTING OR DENYING THE FINDINGS, JANKE CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, SHE IS FINED \$7,500 AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY FOR SIX MONTHS. THE SUSPENSION IS IN EFFECT FROM MAY 7, 2012 THROUGH NOVEMBER 6, 2012. FINE PAID IN FULL ON APRIL 9, 2013

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Reporting Source: Individual
Regulatory Action Initiated By: FINRA
Sanction(s) Sought: Other: N/A
Date Initiated: 04/12/2012



Docket/Case Number:	2011027400401
Employing firm when activity occurred which led to the regulatory action:	MORGAN KEEGAN & COMPANY, INC./WELLS FARGO ADVISORS, LLC
Product Type:	No Product
Allegations:	FINRA RULE 2010, NASD RULES 2110, 2370 - ALISON JANKE BORROWED \$100,000 FROM A CUSTOMER BASES UPON A PERSONAL RELATIONSHIP SHE HAD WITH THE CUSTOMER OUTSIDE OF THE BROKER/CUSTOMER RELATIONSHIP CONTRARY TO HER MEMBER FIRM'S WRITTEN SUPERVISORY PROCEDURES THAT ONLY ALLOWED REGISTERED REPRESENTATIVES TO ACCEPT LOANS FROM CUSTOMERS UNDER LIMITED CIRCUMSTANCES. THE FIRM'S WRITTEN SUPERVISORY PROCEDURES PROVIDED THAT A REGISTERED PERSON MUST RECEIVE PRIOR WRITTEN FIRM APPROVAL BEFORE ACCEPTING A LOAN BASED ON A PERSONAL RELATIONSHIP OUTSIDE OF THE BROKER/CUSTOMER RELATIONSHIP. JANKE DID NOT SEEK OR OBTAIN APPROVAL. WHEN JANKE BECAME ASSOCIATED WITH ANOTHER MEMBER FIRM, THE CUSTOMER TRANSFERRED HER ACCOUNT TO THE NEW FIRM. IN COMPLIANCE QUESTIONNAIRES, JANKE'S NEW FIRM REQUESTED SHE STATE WHETHER SHE HAD EVER BORROWED MONEY FROM A CUSTOMER AND SHE FALSELY ANSWERED "NO." THE CUSTOMER COMPLAINED REGARDING JANKE'S FAILURE TO TIMELY REPAY THE LOAN. THE CUSTOMER AND JANKE ENTERED INTO A SETTLEMENT AGREEMENT REGARDING THE OUTSTANDING AMOUNTS OWED.
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:	04/12/2012
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	ANY CAPACITY
Duration:	SIX MONTHS
Start Date:	05/07/2012
End Date:	11/06/2012
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$7,500.00
Portion Levied against individual:	\$7,500.00

**Payment Plan:****Is Payment Plan Current:****Date Paid by individual:**

Was any portion of penalty waived? No

Amount Waived:**Broker Statement**

WITHOUT ADMITTING OR DENYING THE FINDINGS, JANKE CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, SHE IS FINED \$7,500 AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY FOR SIX MONTHS. THE SUSPENSION IS IN EFFECT FROM MAY 7, 2012 THROUGH NOVEMBER 6, 2012.*****THE CLIENT IS A CLOSE FAMILY FRIEND WHO I HAVE KNOWN MY ENTIRE LIFE AND CONSIDER HER A RELATIVE. IN 2005 MY HUSBAND DID A LOAN WITH THIS CLIENT AND MY GRANDPARENTS TO BUY HOUSES AND SELL THEM. THEY BOUGHT AND SOLD HOUSES SEVERAL TIMES IN 2005 AND 2006 AND THEN IN 2007 ROLLED THE MONEY INTO A LOAN IN BOTH OF OUR NAMES ALONG WITH MY GRANDPARENTS AND THE CLIENT/FRIEND. THE CLIENT RECEIVED INTEREST PAYMENTS EVERY YEAR THE LOAN WAS IN EFFECT. IN 2008 THE REAL ESTATE MARKET DROPPED BY MORE THAN 50%. WE WERE UNABLE TO PAY OFF THE LOAN AS AGREED BUT CONTINUED TO MAKE PAYMENTS TO THE CLIENT. WHEN I LEFT WELLS FARGO IT WAS PLACED ON MY U-5 THAT I HAD BORROWED MONEY FROM A CLIENT. AS OF NOW THE LOAN HAS BEEN PAID.



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:	Firm
Employing firm when activities occurred which led to the complaint:	WACHOVIA SECURITIES LLC N/K/A WELLS FARGO ADVISORS LLC
Allegations:	COMPLAINT: CLIENT ALLEGES MISREPRESENTATION OF INVESTMENT. DATES OF ACTIVITY UNSPECIFIED IN COMPLAINT. ARBITRATION: CLAIMANT ALLEGES THAT INVESTMENT RECOMMENDATIONS MADE IN OR ABOUT APRIL 2008 WERE MISREPRESENTED AND UNSUITABLE. CLAIMANT SEEKS DAMAGES OF AN UNSPECIFIED AMOUNT.
Product Type:	Other: REITS
Alleged Damages:	\$0.00
Alleged Damages Amount Explanation (if amount not exact):	COMPLAINT: \$200,000.00 ARBITRATION: CLAIMANT SEEKS DAMAGES OF AN UNSPECIFIED AMOUNT.
Is this an oral complaint?	No
Is this a written complaint?	Yes
Is this an arbitration/CFTC reparation or civil litigation?	Yes
Arbitration/Reparation forum or court name and location:	FINRA
Docket/Case #:	13-01885
Filing date of arbitration/CFTC reparation or civil litigation:	07/02/2013

Customer Complaint Information

Date Complaint Received:	07/02/2013
Complaint Pending?	No
Status:	Settled
Status Date:	06/24/2014
Settlement Amount:	\$67,380.00
Individual Contribution Amount:	\$0.00
Firm Statement	WITHOUT ADMITTING ANY LIABILITY THE MATTER WAS SETTLED BY RESPONDENTS FOR \$67,380.00 TO AVOID FURTHER ARBITRATION OR LITIGATION. RESPONDENT WFA WAS RESPONSIBLE FOR \$45,440.00 AND TRANSAMERICA WAS RESPONSIBLE FOR \$21,940.00.



Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: WACHOVIA SECURITIES LLC N/K/A WELLS FARGO ADVISORS LLC

Allegations: (1) ORIGINAL CUSTOMER COMPLAINT: CLIENT ALLEGES MISREPRESENTATION OF INVESTMENT. DATES OF ACTIVITY UNSPECIFIED IN COMPLAINT. (2) ARBITRATION: CLAIMANT ALLEGES THAT INVESTMENT RECOMMENDATIONS MADE IN OR ABOUT APRIL 2008 WERE MISREPRESENTED AND UNSUITABLE. CLAIMANT SEEKS DAMAGES OF AN UNSPECIFIED AMOUNT.

Product Type: Other: REITS

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): ORIGINAL CUSTOMER COMPLAINT ALLEGED \$200K IN DAMAGES. ARBITRATION DID NOT SPECIFY DAMAGES.

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation? Yes

Arbitration/Reparation forum or court name and location: FINRA

Docket/Case #: 13-01885

Filing date of arbitration/CFTC reparation or civil litigation: 07/02/2013

Customer Complaint Information

Date Complaint Received: 07/02/2013

Complaint Pending? No

Status: Settled

Status Date: 06/24/2014

Settlement Amount: \$67,380.00

Individual Contribution Amount: \$0.00

Disclosure 2 of 2

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: MORGAN KEEGAN & COMPANY, INC.

Allegations: WRITTEN COMPLAINT BY CLIENT ATTORNEY, DATED 12/16/10, RECEIVED 12/17/10, ALLEGES MISREPRESENTATION WITH REGARD TO JEFFERSON COUNTY ARS PURCHASED IN 2006.

Product Type: Debt-Municipal



Other: AUCTION RATE SECURITIES

Alleged Damages: \$200,000.00

Is this an oral complaint? No

Is this a written complaint? Yes

**Is this an arbitration/CFTC
reparation or civil litigation?** Yes

**Arbitration/Reparation forum
or court name and location:** FINRA

Docket/Case #: 11-03262

**Filing date of
arbitration/CFTC reparation
or civil litigation:** 08/22/2011

Customer Complaint Information

Date Complaint Received: 09/06/2011

Complaint Pending? No

Status: Settled

Status Date: 08/14/2012

Settlement Amount: \$210,098.67

**Individual Contribution
Amount:** \$0.00

Reporting Source: Individual

**Employing firm when
activities occurred which led
to the complaint:** MORGAN KEEGAN & COMPANY, INC.

Allegations: WRITTEN COMPLAINT BY CLIENT ATTORNEY, DATED 12/16/10, RECEIVED 12/17/10, ALLEGES MISREPRESENTATION WITH REGARD TO JEFFERSON COUNTY ARS PURCHASED IN 2006.

Product Type: Debt-Municipal
Other: AUCTION RATE SECURITIES

Alleged Damages: \$200,000.00

Is this an oral complaint? No

Is this a written complaint? Yes

**Is this an arbitration/CFTC
reparation or civil litigation?** Yes

**Arbitration/Reparation forum
or court name and location:** FINRA

Docket/Case #: 11-03262

**Filing date of
arbitration/CFTC reparation
or civil litigation:** 08/22/2011

Customer Complaint Information



Date Complaint Received: 09/16/2011

Complaint Pending? No

Status: Settled

Status Date: 08/14/2012

Settlement Amount: \$210,098.67

Individual Contribution Amount: \$0.00

Broker Statement

I DID BUY THE AUCTION RATE SECURITIES FOR THE CLIENT. HE WAS LOOKING FOR A SHORT TERM INVESTMENT THAT WAS SAFE. I ACCURATELY DISCLOSED THE RISKS OF MUNICIPAL BONDS AND THIS PARTICULAR BOND WAS INSURED THROUGH THE FGIC. WE LOOKED AT THE 35 DAY AUCTION RATE SECURITIES OF MUNICIPAL BONDS SINCE HE WANTED TAX FREE. I SPECIFICALLY ASKED MORGAN KEEGAN WHAT WOULD HAPPEN IF THE AUCTION WERE TO FAIL. MORGAN KEEGAN EXPRESSED TO ME IF THE AUCTION FAILED THEY WOULD TAKE A SECONDARY POSITION IN THE BONDS. WHEN THE AUCTION DID FAIL IN 2008 MORGAN KEEGAN DID NOT AND STILL WILL NOT TAKE THE SECONDARY POSITION THEY TOLD ME AND THE CLIENT THEY WOULD. THE BONDS ARE NOW IN DEFAULT BUT BECAUSE THEY ARE INSURED THE INSURANCE CONTINUES TO PAY THE INTEREST. THE CLIENT IS STILL A CLIENT OF MINE AND TRUSTS ME HE DOES NOT BLAME ME FOR THE FAILURE OF THE MUNICIPAL BOND. HE STRICTLY WANTS AND THINKS MORGAN KEEGAN SHOULD TAKE THE BONDS BACK AS PER THEIR ORIGINAL COMMITMENT. THIS WAS STRICTLY A PRODUCT FAILURE AND NOT A MISREPRESENTATION OF AN INVESTMENT.



End of Report

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