



## IAPD Report

# PAUL LITTON GRONEWOLLER

CRD# 4552868

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## 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

### PAUL LITTON GRONEWOLLER (CRD# 4552868)

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 **06/16/2023**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
<b>IA</b>	ASCENSION FINANCIAL	CRD# 134033	03/23/2005

### 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>B</b>	THE O.N. EQUITY SALES COMPANY	2936	CINCINNATI, OH	07/10/2002 - 05/03/2005
<b>IA</b>	REA CAPITAL MANAGEMENT, LLC	127485	FORT COLLINS, CO	09/03/2003 - 04/28/2005
<b>IA</b>	REA CAPITAL MANAGEMENT, LLC	127485	FT. COLLINS, CO	09/03/2003 - 12/31/2003

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



## 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: **ASCENSION FINANCIAL**  
Main Address: 215 WEST MAGNOLIA ST.  
SUITE 200  
FORT COLLINS, CO 80521  
Firm ID#: 134033

Regulator	Registration	Status	Date
<b>IA</b> Colorado	Investment Adviser Representative	Approved	03/23/2005

#### Branch Office Locations

**ASCENSION FINANCIAL**  
215 W. MAGNOLIA ST.  
SUITE 200  
FT. COLLINS, CO 80521



## 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, 1 general industry/product exam, 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
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<b>B</b> General Securities Representative Examination (S7)	Series 7	07/09/2002
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#### State Securities Law Exams

Exam	Category	Date
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<b>IA</b> Uniform Investment Adviser Law Examination (S65)	Series 65	09/06/2001
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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	07/10/2002 - 05/03/2005	THE O.N. EQUITY SALES COMPANY	CRD# 2936	CINCINNATI, OH
IA	09/03/2003 - 04/28/2005	REA CAPITAL MANAGEMENT, LLC	CRD# 127485	FORT COLLINS, CO
IA	09/03/2003 - 12/31/2003	REA CAPITAL MANAGEMENT, LLC	CRD# 127485	FT. COLLINS, CO

#### 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
04/2005 - Present	RLK-PLG Investment Management LLC	Managing and Founding Member	Y	Fort Collins, CO, 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.

Gronewoller & Associates LLC  
 Owner  
 Consulting  
 Since 01/2005  
 Not Investment Related

Fort Collins Country Club  
 Finance Committee  
 Since 01/2018  
 Not investment related



## 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

### 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:** Individual

**Regulatory Action Initiated By:** Colorado Division of Securities

**Sanction(s) Sought:** Other: Restricted License

**Date Initiated:** 06/27/2018

**Docket/Case Number:** 2018-CDS-044

**Employing firm when activity occurred which led to the regulatory action:** RLK-PLG INVESTMENT MANAGEMENT, LLC

**Product Type:** No Product

**Allegations:**

- a. On December 19, 2014, following the completion of an examination, Staff sent Respondents a deficiency letter (attached as Ex. A) that details violations of Division rules identified by Staff and includes proposed corrective actions.
- b. The deficiencies noted in the December 19, 2014 letter included books and records violations, missing required written supervisory procedures, concerns about custody and safekeeping, issues with contract and Form ADV Disclosures.
- c. On, or about, February 14, 2018, Staff opened a routine examination of Respondents.
- d. On June 14, 2018, following completion of the examination, Staff sent Respondents a deficiency letter that details violations of Division rules identified by Staff and includes proposed corrective actions.
- e. Many of the deficiencies identified in the December 19, 2014 letter were also identified during the 2018 examination and Respondents made little or no effort to correct the deficiencies between December 2014 and June 2018.

**Current Status:** Final

**Resolution:** Stipulation and Consent



**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?** No

**Resolution Date:** 07/15/2018

**Sanctions Ordered:** Other: a.Respondents shall retain a compliance consultant, approved by the Division, for a period of three (3) years to review and develop all required books and records requirements, policies and procedures.  
b.The approved compliance consultant will prepare a report detailing changes made by Respondents in response to the June 14, 2018 deficiency letter. A copy of the report will be sent to Staff within 120 days of the issuance of the Consent Order.

**Disclosure 2 of 2**

**Reporting Source:** Regulator

**Regulatory Action Initiated By:** Colorado Division of Securities

**Sanction(s) Sought:** Other: Restricted License

**Date Initiated:** 06/02/2022

**Docket/Case Number:** 2022-CDS-010

**URL for Regulatory Action:**

**Employing firm when activity occurred which led to the regulatory action:** RLK-PLG Investment Management, LLC, CRD No. 134033

**Product Type:** No Product

**Allegations:** The Colorado Division of Securities (the "Division") conducted an examination in 2022 to review RLK-PLG Investment Management, LLC, CRD No. 134033 and Mr. Gronewoller's, collectively referred to as respondents, adherence to Consent Order No. 2018-CDS-044 from July 2018 (the "2018 Order"). The 2018 Order was violated because the respondents failed to obtain the Colorado Securities Commissioner's approval for a compliance consultant, failed to retain the compliance consultant in the required time period, failed to ensure the consultant prepared a report to submit to the Division detailing changes made in response to the 2018 deficiency letter, and the respondents failed to disclose the 2018 Order to advisory and prospective advisory clients on the Firm's Form ADV Part 2.

**Current Status:** Final

**Resolution:** Stipulation and Consent

**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:** 06/13/2022



<b>Reporting Source:</b>	Individual
<b>Regulatory Action Initiated By:</b>	Colorado Division of Securities
<b>Sanction(s) Sought:</b>	Other: Restricted License
<b>Date Initiated:</b>	06/02/2022
<b>Docket/Case Number:</b>	2022-CDS-010
<b>Employing firm when activity occurred which led to the regulatory action:</b>	RLK-PLG INVESTMENT MANAGEMENT, LLC
<b>Product Type:</b>	No Product
<b>Allegations:</b>	The Colorado Division of Securities (the "Division") conducted an examination in 2022 to review RLK-PLG Investment Management, LLC, CRD No. 134033 and Mr. Gronewoller's, collectively referred to as respondents, adherence to Consent Order No. 2018-CDS-044 from July 2018 (the "2018 Order"). The 2018 Order was violated because the respondents failed to obtain the Colorado Securities Commissioner's approval for a compliance consultant, failed to retain the compliance consultant in the required time period, failed to ensure the consultant prepared a report to submit to the Division detailing changes made in response to the 2018 deficiency letter, and the respondents failed to disclose the 2018 Order to advisory and prospective advisory clients on the Firm's Form ADV Part 2
<b>Current Status:</b>	Final
<b>Resolution:</b>	Stipulation and Consent
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	06/13/2022
<b>Sanctions Ordered:</b>	Other: The firm and Mr. Gronewoller have fourteen (14) days from the entry of the 2022 Consent Order to amend Part 1A, 2A and 2B of the Form ADV and Form U-4 to disclose the 2018 Consent Order and the 2022 Consent Order. The firm and Mr. Gronewoller shall retain a compliance consultant approved by the Division of Securities for a period of three (3) years. The compliance consultant shall ensure compliance with the May 6, 2022, deficiency letter, timely file and update disclosure documents, and review and develop all required policies and procedures to ensure compliance with the Colorado Securities Act ("Act") and the rules under the Act.



## End of Report

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