



IAPD Report

MICHAEL VERN BRADLEY

CRD# 4605220

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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

MICHAEL VERN BRADLEY (CRD# 4605220)

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 **09/24/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	BRADLEY WEALTH LLC	CRD# 131808	02/13/2009

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **3** 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	WEALTH ENHANCEMENT & PRESERVATION, LLC	131808	SCOTTSDALE, AZ	01/23/2008 - 05/21/2009
B	BERTHEL, FISHER & COMPANY FINANCIAL SERVICES, INC.	13609	CEDAR RAPIDS, IA	07/25/2008 - 03/23/2009
IA	ASSOCIATED SECURITIES CORP.	12969	GILBERT, AZ	05/26/2004 - 06/20/2008

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	3
Termination	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 **3** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **BRADLEY WEALTH LLC**
Main Address: 16430 N. SCOTTSDALE ROAD
SUITE 230
SCOTTSDALE, AZ 85254
Firm ID#: 131808

Regulator	Registration	Status	Date
IA Arizona	Investment Adviser Representative	Approved	10/22/2012
IA Texas	Investment Adviser Representative	Restricted Approval	11/09/2010
IA Utah	Investment Adviser Representative	Approved	01/27/2017

Branch Office Locations

BRADLEY WEALTH LLC
16430 N. SCOTTSDALE ROAD
SUITE 230
SCOTTSDALE, AZ 85254



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 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
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No information reported.

General Industry/Product Exams

Exam	Category	Date
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B	General Securities Representative Examination (S7)	Series 7	12/05/2002
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State Securities Law Exams

Exam	Category	Date
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IA	B	Uniform Combined State Law Examination (S66)	Series 66	05/05/2004
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B	Uniform Securities Agent State Law Examination (S63)	Series 63	12/18/2002
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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
IA	01/23/2008 - 05/21/2009	WEALTH ENHANCEMENT & PRESERVATION, LLC	CRD# 131808	SCOTTSDALE, AZ
B	07/25/2008 - 03/23/2009	BERTHEL, FISHER & COMPANY FINANCIAL SERVICES, INC.	CRD# 13609	CEDAR RAPIDS, IA
IA	05/26/2004 - 06/20/2008	ASSOCIATED SECURITIES CORP.	CRD# 12969	GILBERT, AZ
IA	05/12/2004 - 06/20/2008	ASSOCIATED PLANNERS INVESTMENT ADVISORY INC	CRD# 104790	GILBERT, AZ
B	04/14/2003 - 06/20/2008	ASSOCIATED SECURITIES CORP.	CRD# 12969	GILBERT, AZ
IA	05/17/2006 - 12/31/2007	WEALTH ENHANCEMENT & PRESERVATION, LLC	CRD# 131808	GILBERT, AZ
B	12/06/2002 - 04/11/2003	WS GRIFFITH SECURITIES, INC.	CRD# 10410	HARTFORD, CT

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
09/2009 - Present	BRADLEY WEALTH MANAGEMENT, LLC	MANAGING MEMBER	Y	SAN DIEGO, CA, 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.

MICHAEL V. BRADLEY IS ALSO AN INDEPENDENT INSURANCE AGENT: LTC, LIFE AND DISABILITY INSURANCE PLANNING, SINCE 04/2003. NOT INVESTMENT RELATED. THE ADDRESS IS: 350 Tenth Ave, Suite 1000, SAN DIEGO, CA 92101. MICHAEL V. BRADLEY SPENDS APPROXIMATELY 5 HOURS PER MONTH, DURING TRADING HOURS, RELATED TO HIS WORK AS AN INDEPENDENT INSURANCE AGENT.



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	3
Termination	1

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:	Arizona Corporation Commission - Securities Division
Sanction(s) Sought:	Cease and Desist Civil and Administrative Penalty(ies)/Fine(s) Revocation
Date Initiated:	05/22/2025
Docket/Case Number:	S-20662A-25-0111
URL for Regulatory Action:	https://docket.images.azcc.gov/E000044167.pdf?i=1758724322731

Employing firm when activity occurred which led to the regulatory action:

Product Type: Investment Contract

Allegations: The action filed alleges Mr. Bradley violated A.R.S. §44-1991 Fraud in Connection with the Offer or Sale of Securities, A.R.S. §44-1999 CONTROL PERSON LIABILITY, A.R.S. §44-3241 Fraud in the Provision of Investment Advisory Services and Respondent Michael Bradley's conduct is grounds to revoke Bradley's license as an investment adviser representative with the Commission pursuant to A.R.S. §44-3201.

Current Status: Pending

Regulator Statement Mr. Bradley has requested a hearing on charges. The hearing is currently set to begin on May 18, 2026.

**Disclosure 2 of 2**

Reporting Source:	Regulator
Regulatory Action Initiated By:	ARIZONA CORPORATION COMMISSION - SECURITIES DIVISION
Sanction(s) Sought:	Revocation
Date Initiated:	05/21/2009
Docket/Case Number:	S-20662A-09-0188
URL for Regulatory Action:	
Employing firm when activity occurred which led to the regulatory action:	ASSOCIATED SECURITIES CORP.
Product Type:	Other: LIMITED PARTNERSHIP INTERESTS, HEDGE FUND
Allegations:	SELLING AWAY, FRAUD VIOLATIONS UNDER SECURITIES AND INVESTMENT ADVISORY STATE STATUTES. (CONSENT TO ORDER WITHOUT ADMITTING OR DENYING)
Current Status:	Final
Resolution:	Consent
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	Yes
Resolution Date:	05/21/2009
Sanctions Ordered:	Cease and Desist Civil and Administrative Penalty(ies)/Fine(s) Denial Restitution Revocation Other: RESTITUTION \$95,006; PENALTY \$50,000, REVOCATION OF SECURITIES REGISTRATION AND IAR LICENSE, DENIAL OF PENDING IAR AND SECURITIES SALESMAN APPLICATIONS
Monetary Sanction 1 of 2	
Monetary Related Sanction:	Restitution
Total Amount:	\$95,006.00
Portion Levied against individual:	\$95,006.00
Payment Plan:	
Is Payment Plan Current:	Yes
Date Paid by individual:	05/21/2009
Was any portion of penalty waived?	No



Amount Waived:

Monetary Sanction 2 of 2

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$50,000.00

Portion Levied against individual: \$50,000.00

Payment Plan:

Is Payment Plan Current: Yes

Date Paid by individual: 05/21/2009

Was any portion of penalty waived? No

Amount Waived:

Reporting Source: Individual

Regulatory Action Initiated By: ARIZONA CORPORATION COMMISSION

Sanction(s) Sought: Cease and Desist
Civil and Administrative Penalty(ies)/Fine(s)
Denial
Restitution
Revocation

Date Initiated: 03/17/2009

Docket/Case Number: S-2066SA-09-0188

Employing firm when activity occurred which led to the regulatory action: ASSOCIATED SECURITIES CORP

Product Type: Other: LIMITED PARTNERSHIP INTERESTS IN THE APEX FUND

Allegations: CLAIMANTS WERE INVESTED IN APEX HEDGE FUND AND SOUGHT RECOVERY OF DAMAGES THROUGH THE BROKER DEALER, ASSOCIATED SECURITIES CORP (NOW LPL) DUE TO LACK OF SUPERVISION BY BROKER-DEALER ASSIGNED OSJ (THE ADVISOR'S SUPERVISOR)

Current Status: Final

Resolution: Order

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: 05/21/2009

Sanctions Ordered: Cease and Desist
Civil and Administrative Penalty(ies)/Fine(s)
Denial
Restitution



Revocation

Monetary Sanction 1 of 1

Monetary Related Sanction: Restitution

Total Amount: \$95,006.00

Portion Levied against individual: \$0.00

Payment Plan: PAID IN FULL

Is Payment Plan Current: Yes

Date Paid by individual: 05/21/2009

Was any portion of penalty waived? No

Amount Waived:

Broker Statement

OSJ MANAGER RECOMMENDED HEDGE FUND TO ADVISOR AND OSJ ADVISED THE FIRM, IN WRITING, OF HIS INTENT TO PLACE CLIENTS IN THE HEDGE FUND. ADVISOR PROVIDED ADVERTISING AND PROMOTIONAL MATERIALS TO FIRM PER FIRMS REQUIREMENT AND FIRM APPROVED THOSE MATERIALS FOR USE. FIRM WAS INFORMED BY ADVISOR DURING BRANCH AUDITS THAT ADVISOR WAS OFFERING HEDGE FUND INVESTMENT TO CLIENTS.



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: Firm

Employing firm when activities occurred which led to the complaint: ASSOCIATED SECURITIES CORP.

Allegations: UNSUITABLE INVESTMENT IN UNAPPROVED PRODUCT IN JUNE 2007.

Product Type: Other: HEDGE FUND

Alleged Damages: \$300,000.00

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 #: 10-00954

Filing date of arbitration/CFTC reparation or civil litigation: 03/10/2010

Customer Complaint Information

Date Complaint Received: 03/10/2010

Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:

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Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: ASSOCIATED SECURITIES CORPORATION

Allegations: UNSUITQABLE INVESTMENT IN UNAPPROVED PRODUCT IN JUNE 2007

Product Type: Other: HEDGE FUND

Alleged Damages: \$300,000.00

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 #: 10-00954

**Filing date of
arbitration/CFTC reparation
or civil litigation:** 03/10/2012

Customer Complaint Information

Date Complaint Received: 03/10/2012

Complaint Pending? No

Status: Settled

Status Date: 02/01/2011

Settlement Amount: \$90,000.00

**Individual Contribution
Amount:** \$0.00

Disclosure 2 of 3

Reporting Source: Firm

**Employing firm when
activities occurred which led
to the complaint:** ASSOCIATED SECURITIES CORP.

Allegations: ALLEGATIONS OF SUITABILITY, MISREPRESENTATION FROM THE CUSTOMERS ALLEGING THAT MICHAEL BRADLEY RECOMMENDED THAT THEY INVEST IN THE APEX EQUITY OPTIONS FUND, LP. WHICH WAS NOT A PRODUCT APPROVED BY THE FIRM FIRM FOR ITS REGISTERED REPRESENTATIVES TO SELL. THE APEX PRODUCT COLLAPSED IN AUGUST OF 2007

Product Type: Other: OPTIONS HEDGE FUND

Alleged Damages: \$248,618.00

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 #: 08-01824

**Filing date of
arbitration/CFTC reparation
or civil litigation:** 06/04/2008

Customer Complaint Information

Date Complaint Received: 06/11/2008

Complaint Pending? No



Status: Settled
Status Date: 05/12/2009
Settlement Amount: \$212,500.00
Individual Contribution Amount: \$0.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA
Docket/Case #: 08-01824
Date Notice/Process Served: 06/11/2008
Arbitration Pending? No
Disposition: Settled
Disposition Date: 05/12/2008
Monetary Compensation Amount: \$212,500.00
Individual Contribution Amount: \$0.00

Disclosure 3 of 3

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: ASSOCIATED SECURITIES CORP.

Allegations: ALLEGATIONS OF SUITABILITY, MISREPRESENTATION FROM THE CUSTOMERS ALLEGING THAT MICHAEL BRADLEY RECOMMENDED THAT THEY INVEST IN THE APEX EQUITY OPTIONS FUND, LP. WHICH WAS NOT A PRODUCT APPROVED BY THE FIRM FOR ITS REGISTERED REPRESENTATIVES TO SELL. THE APEX PRODUCT COLLAPSED IN AUGUST OF 2007.

Product Type: Options
Alleged Damages: \$248,618.00
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 #: 08-01824
Filing date of arbitration/CFTC reparation or civil litigation: 06/04/2008

Customer Complaint Information



Date Complaint Received: 06/11/2008
Complaint Pending? No
Status: Settled
Status Date: 05/12/2009
Settlement Amount: \$212,500.00
Individual Contribution Amount: \$0.00

Broker Statement

BRADLEY'S ASC-APPOINTED OSJ RECOMMENDED APEX TO BRADLEY AND THE OSJ HAD ADVISED ASC, IN WRITING, OF HIS INTENT TO PLACE CLIENTS IN APEX. BRADLEY HAD PROVIDED APEX PROMOTIONAL MATERIALS TO ASC AND ASC HAD APPROVED THOSE MATERIALS FOR USE BY BRADLEY. REPRESENTATIVES OF ASC WERE INFORMED BY BRADLEY ON AT LEAST TWO OCCASIONS DURING BRANCH AUDITS THAT BRADLEY WAS OFFERING APEX TO CERTAIN CLIENTS. BRADLEY ADVISED ASC OF THIS ACTIVITY IN HIS ANNUAL COMPLIANCE QUESTIONNAIRE. APEX WAS NOT ON ASC'S APPROVED PRODUCT LIST ALTHOUGH BRADLEY UNDERSTOOD FROM HIS ASC-APPOINTED OSJ THAT HIS OSJ HAD OBTAINED APPROVAL FROM ASC.



Termination

This disclosure event involves a situation where the Investment Adviser Representative voluntarily resigned, was discharged or was permitted to resign after allegations were made that accused the Investment Adviser Representative of violating investment-related statutes, regulations, rules or industry standards of conduct; fraud or the wrongful taking of property; or failure to supervise in connection with investment-related statutes, regulations, rules or industry standards of conduct.

Disclosure 1 of 1

Reporting Source: Firm

Firm Name: ASSOCIATED SECURITIES CORP

Termination Type: Discharged

Termination Date: 06/20/2008

Allegations: THE FIRM CONDUCTED AN INTERNAL REVIEW OF THE ADVISOR'S SALES OF A HEDGE FUND TO SEVERAL OF HIS CLIENTS THAT WAS NOT ON THE FIRMS APPROVED PRODUCT LIST. THE FIRM CONCLUDED THAT THE ADVISOR DID NOT OBTAIN PRIOR WRITTEN APPROVAL FROM THE FIRM TO ENGAGE IN THOSE SALES; ALTHOUGH THE REP BELIEVES THAT HIS OSJ WAS OBTAINING THAT APPROVAL FROM THE FIRM. THE FIRM ALSO CONDUCTED AN UNANNOUNCED BRANCH AUDIT AND NOTED THE ADVISOR AND HIS STAFF WERE NOT FOLLOWING THE FIRM'S POLICIES AND PROCEDURES IN SEVERAL KEY AREAS.

Product Type: Other

Other Product Types: HEDGE FUND

Reporting Source: Individual

Firm Name: ASSOCIATED SECURITIES CORP

Termination Type: Discharged

Termination Date: 06/20/2008

Allegations: THE FIRM CONDUCTED AN INTERNAL REVIEW OF THE ADVISOR'S SALES OF A HEDGE FUND TO SEVERAL OF HIS CLIENTS THAT WAS NOT ON THE FIRMS APPROVED PRODUCT LIST. THE FIRM CONCLUDED THAT THE ADVISOR DID NOT OBTAIN PRIOR WRITTEN APPROVAL FROM THE FIRM TO ENGAGE IN THOSE SALES; ALTHOUGH THE REP BELIEVED THAT HIS OSJ WAS OBTAINING THAT APPROVAL FROM THE FIRM. THE FIRM ALSO CONDUCTED AN UNANNOUNCED BRANCH AUDIT AND NOTED THE ADVISOR AND HIS STAFF WERE NOT FOLLOWING THE FIRM'S POLICIES AND PROCEDURES IN SEVERAL KEY AREAS.

Product Type: Other: APEX HEDGE FUND

Broker Statement THE ADVISOR'S FORMER OSJ ADVISED ASC, IN WRITING, OF HIS INTENT TO PLACE CLIENTS IN THE HEDGE FUND. THE ADVISOR PROVIDED HEDGE FUND PROMOTIONAL MATERIALS TO ASC AND ASC APPROVED THOSE MATERIALS FOR USE. REPRESENTATIVES OF ASC WERE INFORMED BY THE ADVISOR ON AT LEAST TWO OCCASIONS DURING BRANCH AUDITS THAT THE ADVISOR WAS OFFERING THE HEDGE FUND INVESTMENT TO CLIENTS. THE ADVISOR INCLUDED THIS ACTIVITY IN HIS ANNUAL COMPLIANCE QUESTIONNAIRE. THE HEDGE FUND WAS NOT ON ASC'S APPROVED PRODUCT LIST ALTHOUGH THE ADVISOR UNDERSTOOD FROM HIS OSJ, WHO HAD RECOMMENDED THE FUND TO THE ADVISOR, THAT HE OBTAINED APPROVAL FROM ASC.



End of Report

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