



IAPD Report

JAMES ROSE

CRD# 4842996

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Please contact FINRA with any concerns.



IAPD Information About Representatives

IAPD offers information on all current-and many former representatives. Investors are strongly encouraged to use IAPD to check the background of representatives before deciding to conduct, or continue to conduct, business with them.

What is included in a IAPD report?

IAPD reports for individual representatives include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards.

It is important to note that the information contained in an IAPD report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

Where did this information come from?

The information contained in IAPD comes from the Investment Adviser Registration Depository (IARD) and FINRA's Central Registration Depository, or CRD, (see more on CRD below) and is a combination of:

- information the states require representatives and firms to submit as part of the registration and licensing process, and
- information that state regulators report regarding disciplinary actions or allegations against representatives.

How current is this information?

Generally, representatives are required to update their professional and disciplinary information in IARD within 30 days.

Need help interpreting this report?

For help understanding how to read this report, please consult NASAA's IAPD Tips page <http://www.nasaa.org/IAPD/IARReports.cfm>

What if I want to check the background of an Individual Broker or Brokerage Firm?

To check the background of an Individual Broker or Brokerage firm, you can search for the firm or individual in IAPD. If your search is successful, click on the link provided to view the available licensing and registration information in FINRA's BrokerCheck website.

Are there other resources I can use to check the background of investment professionals?

It is recommended that you learn as much as possible about an individual representative or Investment Adviser firm before deciding to work with them. Your state securities regulator can help you research individuals and certain firms doing business in your state. The contact information for state securities regulators can be found on the website of the North American Securities Administrators Association <http://www.nasaa.org>



Report Summary

JAMES ROSE (CRD# 4842996)

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 **05/29/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
	STEADTRUST	CRD# 334416	05/02/2025

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **2** 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. RILEY WEALTH ADVISORS, INC.	115927	Sheridan, WY	09/18/2020 - 05/29/2025
	UNITED ADVISORS SERVICES, LLC	150080	DAYTON, WY	05/27/2015 - 09/22/2020
	UBS FINANCIAL SERVICES INC.	8174	NEW YORK, NY	08/08/2005 - 04/01/2015

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

Employment 1 of 1

Firm Name: **STEADTRUST**
Main Address: ALLEN, TX
Firm ID#: 334416

Regulator	Registration	Status	Date
IA Texas	Investment Adviser Representative	Restricted Approval	05/02/2025
IA Wyoming	Investment Adviser Representative	Approved	05/02/2025

Branch Office Locations

STEADTRUST
114 Decker Rd.
Sheridan, WY 82801



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
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B Securities Industry Essentials Examination (SIE)	SIE	04/01/2015
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B General Securities Representative Examination (S7)	Series 7	04/11/2005
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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	05/10/2005
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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	09/18/2020 - 05/29/2025	B. RILEY WEALTH ADVISORS, INC.	CRD# 115927	Sheridan, WY
IA	05/27/2015 - 09/22/2020	UNITED ADVISORS SERVICES, LLC	CRD# 150080	DAYTON, WY
IA	08/08/2005 - 04/01/2015	UBS FINANCIAL SERVICES INC.	CRD# 8174	NEW YORK, NY
B	04/12/2005 - 04/01/2015	UBS FINANCIAL SERVICES INC.	CRD# 8174	NEW YORK, NY

EMPLOYMENT HISTORY

Below is the representative's employment history for up to the last 10 years.

Employment Dates	Employer Name	Position	Investment Related	Employer Location
05/2025 - Present	Steadtrust, LLC	Investment Adviser Representative	Y	Sheridan, WY, United States
09/2020 - 04/2025	B. Riley Wealth Advisors, Inc.	Investment Advisor	Y	Memphis, TN, United States
08/2020 - 07/2022	NATIONAL ASSET MANAGEMENT	INVESTMENT ADVISOR REPRESENTATIVE	Y	DAYTON, WY, United States
05/2015 - 09/2020	UNITED ADVISORS SERVICES, LLC	REGISTERED INVESTMENT ADVISOR	Y	NEW YORK, NY, 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) CENTAUR CAPITAL LLC, DAYTON, WY - OTHER FAMILY INVESTMENTS / MANAGE INVESTMENTS / START DATE 2003, DUTIES - CO-ADMINISTER FAMILY INVESTMENTS F/B/O MR. ROSE'S CHILDREN.

2) CENTAUR INVESTMENTS. DAYTON, WY. NOT INVESTMENT RELATED.BUSINESS - OIL/GAS INVESTMENTS. START DATE - 06/01/2003. .5 HRS/MONTH. NO SECURITIES TRADING HRS. DUTIES - REVIEW OIL/GAS WELLS

3) INDIAN ROCK CORP / 170 MASON STREET GREENWICH, CT 06830 / COMPANY/ OFFICER / DUTIES - CLOSING DOWN ENTITY / START DATE 8/4/2004. THIS WAS A FAMILY OFFICE ESTABLISHED BY HIS GRANDPARENTS THAT CEASED OPERATING IN 2008. THE ENTITY IS STILL OPEN FOR TAX PLANNING AND ESTATE PURPOSES. JAMES DOES NOT HAVE A ROLE IN MANAGING.



Registration & Employment History



OTHER BUSINESS ACTIVITIES

- 4) JAMES SR ROSE TRUST, RR IS AN INCOME BENEFICIARY FROM THE TRUST AND HAS NO AUTHORITY OVER THE TRUST.
- 5) 2 THE SKY LLC, TREE FARM, MANAGEMENT PARTNER, BUFFALO, WV, 1 HR PER MONTH, ZERO DURING TRADING HRS., NOT INVESTMENT RELATED.
- 6) RDL WEALTH MANAGEMENT; INVESTMENT RELATED; DBA FOR FINANCIAL SECURITIES BUSINESS CONDUCTED THROUGH STEADTRUST, INC START DATE 2015; 40 HOURS / WEEK DEVOTED DURING SECURITIES TRADING HOURS.
- 7) BTB CAPITAL LLC - THIS ENTITY WAS ESTABLISHED IN 2025 TO HOLD AN INVESTMENT ACCOUNT THAT JAMES IS THE BENEFICIAL OWNER THAT RESULTED FROM A DIVORCE. THE ACCOUNT IS HELD BY THE FIRM.



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
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:	Floridan Office of Financial Regulation
Sanction(s) Sought:	Civil and Administrative Penalty(ies)/Fine(s)
Date Initiated:	11/07/2017
Docket/Case Number:	72610-SR
URL for Regulatory Action:	
Employing firm when activity occurred which led to the regulatory action:	United Advisors Services LLC
Product Type:	No Product
Allegations:	the subject of an administrative order issued by a national securities association (FINRA) involving violations of its rules
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:	11/07/2017



Sanctions Ordered: Civil and Administrative Penalty(ies)/Fine(s)

Monetary Sanction 1 of 1

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

Total Amount: \$10,000.00

Portion Levied against individual: \$10,000.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual: 11/07/2017

Was any portion of penalty waived? No

Amount Waived:

Regulator Statement

On 11/07/2017, the Office of Financial Regulation entered a Final Order adopting the Stipulation and Consent Agreement in the matter of James Rose. Mr. Rose neither admitted nor denied the findings but consented to the entry of findings by the Office. The Office found that James Rose was the subject of an administrative order issued by a national securities association (FINRA) involving violations of its rules. Pursuant to the Order, Mr. Rose agreed to pay an administrative fine in the amount of \$10,000.

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Reporting Source: Individual

Regulatory Action Initiated By: STATE OF FLORIDA OFFICE OF FINANCIAL REGULATION

Sanction(s) Sought: Civil and Administrative Penalty(ies)/Fine(s)
Revocation
Suspension
Other: Restriction

Date Initiated: 07/26/2017

Docket/Case Number: 72610-SR

Employing firm when activity occurred which led to the regulatory action: United Advisors Services, LLC

Product Type: No Product

Allegations: A Letter of Acceptance, Waiver and Consent ("AWC") was issued against Rose by FINRA on or about February 2, 2017 in case number 2015045020501. Rose did not update his Form U4 to disclose the AWC within thirty days of the AWC being accepted by FINRA on or about February 2, 2017. Rose did not provide the Florida Office of Financial Regulation with notice and copies of the AWC; and Rose did not notify the Florida Office of Financial Regulation within thirty calendar days of the AWC being accepted by FINRA on or about February 2, 2017.

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:	11/07/2017
Sanctions Ordered:	Monetary Penalty other than Fines
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Monetary Penalty other than Fines
Total Amount:	\$10,000.00
Portion Levied against individual:	\$10,000.00
Payment Plan:	
Is Payment Plan Current:	Yes
Date Paid by individual:	11/07/2017
Was any portion of penalty waived?	No
Amount Waived:	
Broker Statement	On or about November 2, 2017, Rose entered into a Stipulation and Consent Agreement with the Florida Office of Financial Regulation, in which he agreed to a fine of \$10,000 without admitting or denying the findings and solely for the purposes of that proceeding, prior to a hearing without an adjudication on any issue of law or fact. The Stipulation and Consent Agreement was confirmed by an Order dated November 7, 2017.
Disclosure 2 of 2	
Reporting Source:	Regulator
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	
Date Initiated:	02/02/2017
Docket/Case Number:	2015045020501
Employing firm when activity occurred which led to the regulatory action:	UBS Financial Services, Inc.
Product Type:	No Product
Allegations:	Without admitting or denying the findings, Rose consented to the sanctions and to the entry of findings that he engaged in six outside business activities (OBAs) without seeking approval from or disclosing these OBAs to his member firm. The findings stated that Rose formed and/or served as an active member of six companies that managed family assets, such as real estate, while associated with his firm, but failed to disclose these OBAs to his firm. The findings also stated while associated with his firm, Rose invested \$200,000 of his own funds in a start-up software applications limited liability company. In exchange for his investment,



Rose became a member of the limited liability company. Rose is not an officer, director or employee of the company. Rose's investment constituted an investment contract, and was, therefore, a private securities transaction. Rose did not provide written notice to, or receive prior written approval from, his firm before making the investment. The findings also included that Rose, while associated with his firm, failed to disclose to his firm that he had either a financial interest or maintained trading authority in 15 accounts held away from the firm.

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:

02/02/2017

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:	six months
Start Date:	02/06/2017
End Date:	08/05/2017

Monetary Sanction 1 of 1

Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$25,000.00
Portion Levied against individual:	\$25,000.00
Payment Plan:	deferred
Is Payment Plan Current:	
Date Paid by individual:	
Was any portion of penalty waived?	No



Amount Waived:

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Reporting Source: Individual

Regulatory Action Initiated By: FINRA

Sanction(s) Sought: Civil and Administrative Penalty(ies)/Fine(s)
Suspension

Date Initiated: 02/02/2017

Docket/Case Number: [2015045020501](#)

Employing firm when activity occurred which led to the regulatory action: UBS FINANCIAL SERVICES, INC.

Product Type: No Product

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, ROSE CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT HE ENGAGED IN SIX OUTSIDE BUSINESS ACTIVITIES (OBAS) WITHOUT SEEKING APPROVAL FROM OR DISCLOSING THESE OBAS TO HIS MEMBER FIRM. THE FINDINGS STATED THAT ROSE FORMED AND/OR SERVED AS AN ACTIVE MEMBER OF SIX COMPANIES THAT MANAGED FAMILY ASSETS, SUCH AS REAL ESTATE, WHILE ASSOCIATED WITH HIS FIRM, BUT FAILED TO DISCLOSE THESE OBAS TO HIS FIRM. THE FINDINGS ALSO STATED WHILE ASSOCIATED WITH HIS FIRM, ROSE INVESTED \$200,000 OF HIS OWN FUNDS IN A START-UP SOFTWARE APPLICATIONS LIMITED LIABILITY COMPANY. IN EXCHANGE FOR HIS INVESTMENT, ROSE BECAME A MEMBER OF THE LIMITED LIABILITY COMPANY. ROSE IS NOT AN OFFICER, DIRECTOR OR EMPLOYEE OF THE COMPANY. ROSE'S INVESTMENT CONSTITUTED AN INVESTMENT CONTRACT, AND WAS, THEREFORE, A PRIVATE SECURITIES TRANSACTION. ROSE DID NOT PROVIDE WRITTEN NOTICE TO, OR RECEIVE PRIOR WRITTEN APPROVAL FROM, HIS FIRM BEFORE MAKING THE INVESTMENT. THE FINDINGS ALSO INCLUDED THAT ROSE, WHILE ASSOCIATED WITH HIS FIRM, FAILED TO DISCLOSE TO HIS FIRM THAT HE HAD EITHER A FINANCIAL INTEREST OR MAINTAINED TRADING AUTHORITY IN 15 ACCOUNTS HELD AWAY FROM THE FIRM.

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: 02/02/2017

Sanctions Ordered: Civil and Administrative Penalty(ies)/Fine(s)
Suspension
Other: WITHOUT ADMITTING OR DENYING THE FINDINGS, ROSE CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE HE WAS FINED \$25,000 AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER FIRM IN ANY CAPACITY FOR SIX MONTHS. MR. ROSE'S SUSPENSION FROM ASSOCIATING WITH ANY FINRA MEMBER FIRM



IN ANY CAPACITY WAS IN EFFECT FROM FEBRUARY 6, 2017 THROUGH AUGUST 5, 2017.

Sanction 1 of 1

Sanction Type: Suspension
Capacities Affected: All Capacities
Duration: 6 months
Start Date: 02/06/2017
End Date: 08/05/2017

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)
Total Amount: \$25,000.00
Portion Levied against individual: \$25,000.00
Payment Plan:
Is Payment Plan Current: No
Date Paid by individual:
Was any portion of penalty waived? No

Amount Waived:

Broker Statement

ON FEBRUARY 2, 2017, MR. ROSE REACHED A SETTLEMENT WITH FINRA. WITHOUT ADMITTING OR DENYING THE FINDINGS, ROSE CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS. MR ROSE WAS FINED \$25,000 AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER FIRM IN ANY CAPACITY FOR SIX MONTHS FROM FEBRUARY 6, 2017 THROUGH AUGUST 5, 2017.



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: UBS FINANCIAL SERVICES INC.

Termination Type: Discharged

Termination Date: 03/04/2015

Allegations: MR. ROSE'S EMPLOYMENT WAS TERMINATED AFTER THE FIRM LEARNED THAT, WITHOUT THE KNOWLEDGE OR APPROVAL OF MANAGEMENT, HE MAINTAINED AND TRADED IN MULTIPLE BROKERAGE ACCOUNTS FOR HIMSELF AND HIS FAMILY AT OTHER FINANCIAL INSTITUTIONS AND INVESTED IN MULTIPLE OUTSIDE PRIVATE INVESTMENTS, INCLUDING PRIVATE FAMILY INVESTMENTS.

Product Type: No Product

Reporting Source: Individual

Firm Name: UBS FINANCIAL SERVICES, INC.

Termination Type: Discharged

Termination Date: 03/04/2015

Allegations: MR. ROSE'S EMPLOYMENT WAS TERMINATED AFTER THE FIRM LEARNED THAT, WITHOUT THE KNOWLEDGE OR APPROVAL OF MANAGEMENT, HE MAINTAINED AND TRADED IN MULTIPLE BROKERAGE ACCOUNTS FOR HIMSELF AND HIS FAMILY AT OTHER FINANCIAL INSTITUTIONS AND INVESTED IN MULTIPLE OUTSIDE PRIVATE INVESTMENTS, INCLUDING PRIVATE FAMILY INVESTMENTS.

Product Type: Other: PRIVATE FAMILY INVESTMENTS

Broker Statement CERTAIN OF THE PRIVATE INVESTMENTS AND ACCOUNTS DESCRIBED ABOVE WERE ESTABLISHED BY MR. ROSE OR HIS FAMILY MEMBERS FOR THE PURPOSE OF ESTATE PLANNING ON BEHALF OF MR. ROSE'S IMMEDIATE AND EXTENDED FAMILY. IN ADDITION, SOME OF THESE INVESTMENTS INVOLVED MR. ROSE INDIRECTLY AS A RESULT OF MARRIAGE. WITH RESPECT TO THESE INVESTMENTS, MR. ROSE HAS NOT RECEIVED COMPENSATION FOR ANY SERVICES RENDERED. WHEN MR. ROSE'S PREVIOUS EMPLOYER REQUESTED INFORMATION CONCERNING THE OUTSIDE INVESTMENTS, MR. ROSE COOPERATED WITH THAT REQUEST. MR. ROSE'S DEPARTURE FROM HIS PRIOR FIRM WAS NOT AS A RESULT OF ANY CLIENT COMPLAINTS.



End of Report

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