



IAPD Report

BRIAN ERLE GRAY

CRD# 4957599

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Qualifications	2 - 3
Registration and Employment History	4
Disclosure Information	5

i 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

BRIAN ERLE GRAY (CRD# 4957599)

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 **12/08/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	GRAYLARK FINANCIAL, LLC	CRD# 325833	06/04/2023

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
IA	APO FINANCIAL SERVICES, LLC	297647	WESTMINSTER, CO	07/08/2019 - 05/04/2023
IA	HORTER INVESTMENT MANAGEMENT, LLC	119880	BOULDER, CO	04/23/2012 - 08/13/2019

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
Customer Dispute	1



Qualifications

REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works. This individual is currently registered with **2** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **GRAYLARK FINANCIAL, LLC**
Main Address: BLUFFTON, SC
Firm ID#: 325833

	Regulator	Registration	Status	Date
IA	Colorado	Investment Adviser Representative	Approved	06/04/2023
IA	South Carolina	Investment Adviser Representative	Approved	07/17/2025

Branch Office Locations

GRAYLARK FINANCIAL, LLC
BLUFFTON, SC



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, 0 general industry/product exams, and 1 state securities law exam.

Principal/Supervisory Exams

Exam	Category	Date
------	----------	------

No information reported.

General Industry/Product Exams

Exam	Category	Date
------	----------	------

No information reported.

State Securities Law Exams

Exam	Category	Date
------	----------	------

IA	Uniform Investment Adviser Law Examination (S65)	Series 65	03/24/2012
----	--	-----------	------------

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	07/08/2019 - 05/04/2023	APO FINANCIAL SERVICES, LLC	CRD# 297647	WESTMINSTER, CO
IA	04/23/2012 - 08/13/2019	HORTER INVESTMENT MANAGEMENT, LLC	CRD# 119880	BOULDER, 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
03/2023 - Present	Graylark Financial, LLC	CEO &CCO	Y	Denver, CO, United States
03/2023 - Present	Graylark Insurance Services LLC	CEO	N	Denver, CO, United States
03/2019 - 05/2023	APO FINANCIAL SERVICES, LLC	CCO & IAR	Y	WESTMINSTER, CO, United States
06/2014 - 05/2023	APO FINANCIAL INC	INSURANCE AGENT/PRESIDENT	N	BROOMFIELD, CO, United States
12/2012 - 05/2023	ASSET PROTECT ONE	PRESIDENT	N	BOULDER, CO, United States
04/2012 - 08/2019	HORTER INVESTMENT MANAGEMENT, LLC	INVESTMENT ADVISOR REPRESENTATIVE	Y	CINCINNATI, OH, 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). Graylark Insurance Services LLC
 INVESTMENT RELATED?: NO
 ADDRESS OF OTHER BUSINESS: 774 Pagoda Ct, Erie, CO 80516
 NATURE OF OTHER BUSINESS: INSURANCE AND ANNUITY SALES, CONSOLIDATED TAX RETURNS
 YOUR POSITION: Owner and Manager
 START DATE: 4/2023
 HOW MANY HOURS YOU DEVOTE TO THE OTHER BUSINESS PER MONTH: 40
 HOW MANY HOURS YOU DEVOTE TO THE OTHER BUSINESS PER MONTH DURING SECURITIES TRADING HOURS: 40
 BRIEFLY DESCRIBE YOUR DUTIES: INSURANCE AND ANNUITY SALES



Disclosure Summary

Disclosure Information

What you should know about reported disclosure events:

(1) Certain thresholds must be met before an event is reported to IARD, for example:

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

(2) Disclosure events in IAPD reports come from different sources:

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

(3) There are different statuses and dispositions for disclosure events:

- A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
 - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

(4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.



DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

Type	Count
Customer Dispute	1

Customer Dispute

This section provides information regarding a customer dispute that was reported to the Investment Adviser Registration Depository (IARD) by the Investment Adviser Representative (IAR), an investment adviser and/or securities firm, and/or a securities regulator. The event may include a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit that contains allegations of sales practice violations against the individual.

The customer dispute may be pending or may have resulted in a civil judgment, arbitration award, monetary settlement, closure without action, withdrawal, dismissal, denial, or other outcome.

Disclosure 1 of 1

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	Horter Investment Management
Allegations:	The claimant sued claiming that we were negligent by not informing her that using her annuity as collateral for a loan to replace inventory that she gave away during the floods of 2013 would trigger a tax event. Suit claimed that we were the ones who suggested using the annuity as collateral thus the cause of the tax. Client claims that because of the tax she was forced to liquidate the IRA to pay for the tax causing an extra tax burden.
Product Type:	Annuity-Fixed
Alleged Damages:	\$106,500.00
Alleged Damages Amount Explanation (if amount not exact):	The use of the annuity as collateral for the loan cost [Customer] more than \$76,500.00 in taxes and penalties. Cashing in the annuity cost her surrender charges of approx. \$30,000.00 in addition taxes previously paid. In addition to the above stated amounts, [Customer] also lost potential gains in connection with the Fixed Annuity that was linked to the S&P 500.
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:	District Court Boulder, CO
Docket/Case #:	2016cv030930



Filing date of arbitration/CFTC reparation or civil litigation: 08/19/2016

Customer Complaint Information

Date Complaint Received: 08/23/2016

Complaint Pending? No

Status: Settled

Status Date: 07/25/2017

Settlement Amount: \$92,500.00

Individual Contribution Amount: \$92,500.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): Judicial Arbitrator Group, Inc

Docket/Case #: 2017-0814

Date Notice/Process Served: 07/25/2017

Arbitration Pending? No

Disposition: Settled

Disposition Date: 07/25/2017

Monetary Compensation Amount: \$92,500.00

Individual Contribution Amount: \$92,500.00

Civil Litigation Information

Type of Court: State Court

Name of Court: District Court of Boulder, CO

Location of Court: Boulder, CO

Docket/Case #: 2016cv030930

Date Notice/Process Served: 08/23/2016

Litigation Pending? No

Disposition: Settled

Disposition Date: 07/25/2017

Monetary Compensation Amount: \$92,500.00

Individual Contribution Amount: \$92,500.00

Type of Court: No appeal was filed

Name of Court:

Location of Court:



Docket/Case #:

Broker Statement

During deposition of the claimant's loan officer, the loan officer admitted that she suggested using the annuity as collateral for the loan the bank made to the claimant and that such suggestion did not originate from us. Upon request of the loan officer, [Third Party] facilitated the process by asking the insurance company to forward the appropriate forms that the bank would need to use the claimant's annuity as collateral for the loan. We did not participate in any way in the loan process. On advice of our legal council we were advised to settle the matter because the legal costs to proceed to trial to prove we were not at fault would have exceeded the settlement amount. The case was dismissed with prejudice in our favor prior to finalization of the settlement process.



End of Report

This page is intentionally left blank.