



IAPD Report

GERMAN RICARDO MORA

CRD# 5032958

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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

GERMAN RICARDO MORA (CRD# 5032958)

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 **09/14/2023**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	GAGNI WEALTH MANAGEMENT LLC	CRD# 169527	11/13/2021
IA	ERNST & YOUNG INVESTMENT ADVISERS LLP	CRD# 110921	10/31/2023

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	SB ADVISORY, LLC	154680	Miami, FL	05/17/2021 - 12/23/2021
B	SAN BLAS SECURITIES LLC	290605	CHICAGO, IL	05/14/2021 - 12/23/2021
IA	INTERCAM ADVISORS, INC.	153799	MIAMI, FL	07/03/2019 - 03/09/2021

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	1
Termination	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 **2** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 2

Firm Name: **ERNST & YOUNG INVESTMENT ADVISERS LLP**
Main Address: 200 PLAZA DRIVE
FIRST FLOOR SUITE 102
SECAUCUS, NJ 07094
Firm ID#: 110921

	Regulator	Registration	Status	Date
IA	Florida	Investment Adviser Representative	Approved	10/31/2023

Branch Office Locations

ERNST & YOUNG INVESTMENT ADVISERS LLP
200 S Orange Ave #2800
Orlando, FL 32801

ERNST & YOUNG INVESTMENT ADVISERS LLP
Poinciana, FL

Employment 2 of 2

Firm Name: **GAGNI WEALTH MANAGEMENT LLC**
Main Address: 17806 IH 10 STE. 300
SAN ANTONIO, TX 78257
Firm ID#: 169527

	Regulator	Registration	Status	Date
IA	Texas	Investment Adviser Representative	Approved	11/13/2021

Branch Office Locations

GAGNI WEALTH MANAGEMENT LLC
Davenport, FL



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	12/07/2005

State Securities Law Exams

Exam	Category	Date
IA B Uniform Combined State Law Examination (S66)	Series 66	08/02/2006



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	05/17/2021 - 12/23/2021	SB ADVISORY, LLC	CRD# 154680	Miami, FL
B	05/14/2021 - 12/23/2021	SAN BLAS SECURITIES LLC	CRD# 290605	CHICAGO, IL
IA	07/03/2019 - 03/09/2021	INTERCAM ADVISORS, INC.	CRD# 153799	MIAMI, FL
B	06/28/2019 - 03/09/2021	INTERCAM SECURITIES, INC.	CRD# 146667	MIAMI, FL
IA	08/29/2017 - 06/28/2019	MORA WEALTH MANAGEMENT LLC	CRD# 112221	MIAMI, FL
B	08/29/2017 - 06/28/2019	MORA WM SECURITIES	CRD# 158599	MIAMI, FL
IA	03/14/2017 - 03/14/2017	GAGNI ASSET MANAGEMENT LLC	CRD# 169527	MIAMI, FL
B	11/29/2016 - 02/24/2017	WELLS FARGO CLEARING SERVICES, LLC	CRD# 19616	MIAMI, FL
IA	11/29/2016 - 02/24/2017	WELLS FARGO CLEARING SERVICES, LLC	CRD# 19616	MIAMI, FL
B	01/21/2015 - 12/02/2016	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	SAN ANTONIO, TX
IA	01/21/2015 - 12/02/2016	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	SAN ANTONIO, TX
B	05/16/2013 - 11/24/2014	BBVA SECURITIES INC.	CRD# 27060	SAN ANTONIO, TX
IA	07/11/2011 - 11/24/2014	BBVA WEALTH SOLUTIONS INC.	CRD# 110476	SAN ANTONIO, TX
B	06/24/2011 - 05/16/2013	BBVA COMPASS INVESTMENT SOLUTIONS, INC	CRD# 17086	SAN ANTONIO, TX
IA	09/14/2007 - 09/15/2009	CP CAPITAL SECURITIES, INC.	CRD# 15029	MIAMI, FL



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	09/07/2007 - 09/15/2009	CP CAPITAL SECURITIES	CRD# 15029	MIAMI, FL
IA	08/07/2006 - 05/25/2007	UBS FINANCIAL SERVICES INC.	CRD# 8174	MIAMI, FL
B	07/19/2006 - 05/25/2007	UBS FINANCIAL SERVICES INC.	CRD# 8174	MIAMI, 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
09/2023 - Present	Tapfin/EY	Financial Planner	Y	Orlando, FL, United States
11/2021 - Present	Gagni Asset Management LLC	Investment management	Y	San Antonio, TX, United States
05/2021 - 12/2021	San Blas Securities/SB Advisory	Finacial Advisor	Y	Atlanta, GA, United States
06/2019 - 03/2021	INTERCAM SECURITIES	FINANCIAL ADVISOR	Y	Miami, FL, United States
08/2017 - 06/2019	MORA WEALTH MANAGEMENT	FINANCIAL ADVISOR	Y	Miami, FL, United States
02/2017 - 08/2017	GM Financial & Trust LLC	Investment Management	Y	Miami, FL, United States
11/2016 - 02/2017	Wells Fargo Advisors	FINANCIAL ADVISOR	Y	MIAMI, FL, United States
01/2015 - 12/2016	Merrill Lynch	Financial Advisor	Y	San Antonio, TX, United States
01/2015 - 12/2016	Wells Fargo Advisors	SVP - INTL FINANCIAL ADVISOR	Y	SAN ANTONIO, TX, 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.

GM Financial & Trust, LLC, Investments Management, Orlando, FL, 100% Ownership; Since 1/2015, 20 Hours per month; 1 hour during trading.



Registration & Employment History



OTHER BUSINESS ACTIVITIES

Robert A Brandon Inc. Investment Related; Miami, FL Insurance Sales, Since 3/2020; 2 hours per month



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	1
Termination	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 1

Reporting Source: Regulator

Regulatory Action Initiated By: FINRA

Sanction(s) Sought: Other: N/A

Date Initiated: 09/30/2022

Docket/Case Number: [2021070633001](#)

Employing firm when activity occurred which led to the regulatory action: Intercom Securities, Inc.; Intercom Advisors, Inc.

Product Type: Insurance

Allegations: Without admitting or denying the findings, Mora consented to the sanctions and to the entry of findings that he engaged in an OBA by becoming an insurance agent with an insurance brokerage company and selling a life insurance policy to a customer of his member firm for which he received \$5,785 in compensation without providing prior written notice to his firm or obtaining its prior approval before engaging in this activity. The findings stated that Mora also falsely attested on a firm annual compliance questionnaire that his previous Form U4 OBA disclosures were accurate and complete, even though he did not include his OBA with the insurance brokerage company.

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:

09/30/2022

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:	All capacities
Duration:	45 days
Start Date:	10/03/2022
End Date:	11/16/2022

Monetary Sanction 1 of 1

Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$5,000.00
Portion Levied against individual:	\$5,000.00
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)
Date Initiated:	04/07/2022
Docket/Case Number:	2021070633001
Employing firm when activity occurred which led to the regulatory action:	Intercam Securities, Intercam Advisors



Product Type:	Insurance
Allegations:	Provided inaccurate information regarding discharge at prior firm; Conduct including exercising time and price discretion in client accounts and mismarking trades as unsolicited.
Current Status:	Final
Action Appealed To:	FINRA
Date Appeal filed:	04/07/2022
Appeal Limitation Details:	
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?	Yes
Resolution Date:	09/30/2022
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	Suspension from associating with any FINRA member firm in any capacity
Duration:	45 days
Start Date:	10/03/2022
End Date:	11/16/2022
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$5,000.00
Portion Levied against individual:	\$5,000.00
Payment Plan:	
Is Payment Plan Current:	Yes
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	
Broker Statement	I DID advise management about the insurance policy sale and even requested to be appointed with AXA which was the available agency. They did not appoint me and so I requested another insurance agency to be appointed but management did NOT follow through. We were in the midst of the pandemic working from home and sent several emails indicating I was doing the transaction. Compliance did NOT update my U4 at the time of the transaction.



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 2

Reporting Source: Firm
Firm Name: WELLS FARGO CLEARING SERVICES, LLC
Termination Type: Discharged
Termination Date: 01/25/2017
Allegations: Provided inaccurate information regarding discharge at prior employment.
Product Type: No Product

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Reporting Source: Individual
Firm Name: WELLS FARGO CLEARING SERVICES
Termination Type: Discharged
Termination Date: 01/25/2017
Allegations: PROVIDED INACCURATE INFORMATION REGARDING DISCHARGE AT PRIOR EMPLOYMENT
Product Type: No Product

Disclosure 2 of 2

Reporting Source: Firm
Firm Name: Merrill Lynch, Pierce, Fenner & Smith Incorporated
Termination Type: Discharged
Termination Date: 11/11/2016
Allegations: Conduct including exercising time and price discretion in client accounts and mismarking trades as unsolicited.
Product Type: Other: Exchange Traded Funds

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Reporting Source: Individual
Firm Name: Merrill Lynch, Pierce, Fenner & Smith Incorporated
Termination Type: Discharged
Termination Date: 11/11/2016
Allegations: Conduct including exercising time and price discretion in client accounts and mismarking trades as unsolicited.
Product Type: Other: Exchange Traded Funds
Broker Statement FINRA conducted investigation and concluded that Time and Price discretion to be not true, as well as unsolicited trades that were placed for my own account. Because of these allegations by Merrill Lynch, once I was over at Wells Fargo they



issued the inaccurate U5 being the cause for a second termination. The investigation concluded 2 years afterwards, so the terminations could not be undone.



End of Report

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