



IAPD Report

TERRY XING-ZHAO WU

CRD# 5049038

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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

TERRY XING-ZHAO WU (CRD# 5049038)

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 **01/07/2025**.

CURRENT EMPLOYERS

Firm	CRD#	Registered Since
IA TDIRECTION ASSET MANAGEMENT	CRD# 285730	05/04/2017

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 NI ADVISORS	134502	San Francisco, CA	11/09/2018 - 01/28/2020
IA NI ADVISORS	134502	San Francisco, CA	11/09/2018 - 01/28/2020
B USA FINANCIAL SECURITIES CORPORATION	103857	San Francisco, CA	04/04/2016 - 11/01/2016

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
Criminal	1
Customer Dispute	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 **1** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **TDIRECTION ASSET MANAGEMENT**
Main Address: 2409 25TH AVE,
SUITE 100
SAN FRANCISCO, CA 94116
Firm ID#: 285730

Regulator	Registration	Status	Date
IA California	Investment Adviser Representative	Approved	05/04/2017

Branch Office Locations

TDIRECTION ASSET MANAGEMENT
2409 25TH AVE,
SUITE 100
SAN FRANCISCO, CA 94116



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 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 Securities Industry Essentials Examination (SIE)	SIE	11/01/2016
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B General Securities Representative Examination (S7)	Series 7	11/16/2005
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State Securities Law Exams

Exam	Category	Date
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IA Uniform Investment Adviser Law Examination (S65)	Series 65	12/17/2021
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IA B Uniform Combined State Law Examination (S66)	Series 66	12/09/2005
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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
B	11/09/2018 - 01/28/2020	NI ADVISORS	CRD# 134502	San Francisco, CA
IA	11/09/2018 - 01/28/2020	NI ADVISORS	CRD# 134502	San Francisco, CA
B	04/04/2016 - 11/01/2016	USA FINANCIAL SECURITIES CORPORATION	CRD# 103857	San Francisco, CA
IA	04/04/2016 - 11/01/2016	USA FINANCIAL SECURITIES CORPORATION	CRD# 103857	San Francisco, CA
IA	12/12/2005 - 02/12/2016	THRIVENT INVESTMENT MANAGEMENT INC.	CRD# 18387	SAN MATEO, CA
B	11/17/2005 - 02/12/2016	THRIVENT INVESTMENT MANAGEMENT INC.	CRD# 18387	SAN MATEO, CA

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
10/2016 - Present	TD & Christy Insurance Agency, LLC	Limited Partner	N	San Bruno, CA, United States
04/2016 - Present	Tdirection Asset Management (formerly TD Advisory Group)	managing partner	Y	San Francisco, CA, United States
04/2013 - 09/2020	Serendipity Business Solutions, LLC	Manager	N	Panama City, FL, United States
01/2016 - 09/2018	Terry Wu	TAX PREPARER	N	SAN FRANCISCO, CA, United States
04/2016 - 10/2016	USA FINANCIAL SECURITIES	Registered Representative	Y	Ada, MI, 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.

TD & Christy Insurance Agency, LLC, Non-Investment Related, 715 El camino Real, Suite 202, San Bruno CA 94066. P&C Insurance. Limited Partner since October 2016. 10 hours/month, 0 hours/month during NAI business hours. Oversee Business



Registration & Employment History



OTHER BUSINESS ACTIVITIES

Performance.



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
Criminal	1
Customer Dispute	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 2

Reporting Source:	Individual
Regulatory Action Initiated By:	CA Department of Insurance
Sanction(s) Sought:	Suspension
Date Initiated:	06/18/2018
Docket/Case Number:	OBS 3236-A
Employing firm when activity occurred which led to the regulatory action:	THRIVENT FINANCIAL, USA FINANCIAL
Product Type:	Insurance
Allegations:	OUTSIDE BUSINESS
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:	06/22/2018



Sanctions Ordered: Suspension

Sanction 1 of 1

Sanction Type: Suspension

Capacities Affected: All

Duration: 5 DAYS

Start Date: 06/18/2018

End Date: 06/22/2018

Disclosure 2 of 2

Reporting Source: Regulator

Regulatory Action Initiated By: FINRA

Sanction(s) Sought: Other: n/a

Date Initiated: 11/16/2017

Docket/Case Number: [2016048896401](#)

Employing firm when activity occurred which led to the regulatory action: Thrivent Investment Management Inc.; USA Financial Securities Corporation

Product Type: Insurance

Allegations: Without admitting or denying the findings, Wu consented to the sanctions and to the entry of findings that he engaged in an outside business activity that involved providing fee-based college planning services to customers, which he did not disclose to his member firm. The findings stated that Wu's business offered assistance with financial aid forms, college applications, and personal admission statements, and financial planning for college. The business collected approximately \$28,000 in fees from firm customers and others for college planning services. The findings also stated that Wu solicited a prospective insurance customer to invest in a life insurance product that was not approved for sale by his firm. Wu had a reasonable expectation of earning a commission from the sale of the life insurance product. Wu did not seek or obtain approval from the firm to sell the life insurance product.

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: 11/16/2017

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: All capacities
Duration: two months
Start Date: 11/20/2017
End Date: 01/19/2018

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: 10/10/2018
Was any portion of penalty waived? No

Amount Waived:

Regulator Statement Fines paid in full on October 10, 2018.

Reporting Source: Firm
Regulatory Action Initiated By: FINRA
Sanction(s) Sought: Other: n/a
Date Initiated: 11/16/2017
Docket/Case Number: [2016048896401](#)

Employing firm when activity occurred which led to the regulatory action: USA Financial Securities Corporation

Product Type: Insurance

Allegations: Without admitting or denying the findings, Wu consented to the sanctions and to the entry of findings that he engaged in an outside business activity that involved providing fee-based college planning services to customers, which he did not disclose to his member firm. The findings stated that Wu's business offered assistance with financial aid forms, college applications, and personal admission statements, and financial planning for college. The business collected approximately \$28,000 in fees from firm customers and others for college planning services. The findings also stated that Wu solicited a prospective insurance customer to invest in a life insurance product that was not approved for sale by his firm. Wu had a reasonable expectation of earning a commission from the sale of the life insurance product. Wu did not seek or obtain approval from the firm to sell the life insurance product.

Current Status: Final



Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	11/16/2017
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: All Capacities
Duration: Two Months
Start Date: 11/20/2017
End Date: 01/19/2018

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: 10/10/2018
Was any portion of penalty waived? No

Amount Waived:

Firm Statement Fines paid in full on October 10, 2018.

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Reporting Source: Individual
Regulatory Action Initiated By: FINRA
Sanction(s) Sought: Suspension
Date Initiated: 11/20/2017
Docket/Case Number: [2016048896401](#)



Employing firm when activity occurred which led to the regulatory action:	THRIVENT FINANCIAL USA FINANCIAL
Product Type:	Insurance
Allegations:	Without admitting or denying the findings, Wu consented to the sanctions and to the entry of findings that he engaged in an outside business activity that involved providing fee-based college planning services to customers, which he did not disclose to his member firm. The findings stated that Wu's business offered assistance with financial aid forms, college applications, and personal admission statements, and financial planning for college. The business collected approximately \$28,000 in fees from firm customers and others for college planning services. The findings also stated that Wu solicited a prospective insurance customer to invest in a life insurance product that was not approved for sale by his firm. Wu had a reasonable expectation of earning a commission from the sale of the life insurance product. Wu did not seek or obtain approval from the firm to sell the life insurance product.
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:	11/20/2017
Sanctions Ordered:	Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	RIA CALIFORNIA
Duration:	2 MONTHS
Start Date:	11/20/2017
End Date:	01/19/2018
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:	No
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	



Criminal

This disclosure event involves a criminal charge against the Investment Adviser Representative that has resulted in a dismissal, plea, acquittal or conviction. The criminal matter may relate to any felony or certain misdemeanor offenses (e.g., bribery, perjury, forgery, counterfeiting, extortion, fraud, wrongful taking of property).

Disclosure 1 of 1

Reporting Source:	Individual
Formal Charges were brought in:	Federal Court
Name of Court:	UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF GEORGIA
Location of Court:	SAVANNAH DIVISION
Docket/Case #:	CR420056
Charge Date:	08/27/2020
Charge(s) 1 of 1	
Formal Charge(s)/Description:	WILD LIFE AND DRUG TRAFFICKING CONSPIRACY. NON-INVESTMENT-RELATED. MONEY LAUNDERING CONSPIRACY, 1 FELONY CHARGE, NOT PLEA, IN PRE-TRIAL PERIOD. NON-INVESTMENT-RELATED.
No of Counts:	3
Felony or Misdemeanor:	Felony
Plea for each charge:	WILD LIFE AND DRUG TRAFFICKING CONSPIRACY
Disposition of charge:	Dismissed
Current Status:	Final
Status Date:	09/05/2022
Disposition Date:	09/05/2022
Sentence/Penalty:	case was closed with court seal. no probation nor penalty was placed.



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:	THRIVENT INVESTMENT MANAGEMENT INC
Allegations:	CUSTOMER STATED RR DID NOT FOLLOW HER DIRECTIONS TO TRANSFER 100% OF THE VALUE OF HER VARIABLE ANNUITY TO THE RETURN PROTECTION ALLOCATION SUBACCOUNT IN MARCH 2012. FIRM FOUND NO EVIDENCE THAT RR DID NOT FOLLOW INSTRUCTION, AND PROCESSED THE REQUEST AS SIGNED FOR BY CUSTOMER. CUSTOMER SUBSEQUENTLY REQUESTED COMPLETE SURRENDER AND AS A GOODWILL GESTURE, FIRM AGREED TO WAIVE APPLICABLE SURRENDER CHARGES.
Product Type:	Annuity-Variable
Alleged Damages:	\$7,557.62
Alleged Damages Amount Explanation (if amount not exact):	CALCULATION COMPLETED AS OF 4/9/13: VALUE OF CONTRACT = \$209,933.78, LESS SURRENDER CHARGES OF \$7,557.62 = NET SURRENDER VALUE OF \$202,376.16.
Is this an oral complaint?	No
Is this a written complaint?	Yes
Is this an arbitration/CFTC reparation or civil litigation?	No

Customer Complaint Information

Date Complaint Received:	04/04/2013
Complaint Pending?	No
Status:	Settled
Status Date:	04/23/2013
Settlement Amount:	\$7,570.75
Individual Contribution Amount:	\$0.00



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: USA Financial Securities

Termination Type: Discharged

Termination Date: 10/13/2016

Allegations: Violation of written supervisory procedures with respect to undisclosed outside business activities, use of unapproved client correspondence, and failure to promptly disclose a FINRA investigation/enforcement action.

Product Type: Insurance
Other: Premium Financed Insurance Trusts

Firm Statement After an internal investigation it was determined that Mr. Wu had violated USA Financial Securities polices as follows:
1.) Failure to disclose an outside business activity;
2.) Impermissible use of a 3rd party social media application; and 3.) Failure to disclose a regulatory investigation.

Reporting Source: Individual

Firm Name: USA financial

Termination Type: Discharged

Termination Date: 10/13/2016

Allegations: Violation of written supervisory procedures with respect to undisclosed outside business activities, use of unapproved client correspondence, and failure to promptly disclose a FINRA investigation/enforcement action

Product Type: Insurance

Disclosure 2 of 2

Reporting Source: Firm

Firm Name: Thrivent Investment Management Inc

Termination Type: Discharged

Termination Date: 01/20/2016

Allegations: Violation of Firm policies regarding Public Appearances and Outside Business Activities.

Product Type: No Product

Reporting Source: Individual

Firm Name: Thrivent Financial

Termination Type: Discharged



Termination Date:	01/20/2016
Allegations:	Firm's public speaking engagements and outside business policies; misuse of the firm's proprietary information and failing to follow management directive.
Product Type:	No Product



End of Report

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