



## IAPD Report

# ZACHARY STUART BRODT

CRD# 5228473

<b><u>Section Title</u></b>	<b><u>Page(s)</u></b>
Report Summary	1
Qualifications	2 - 3
Registration and Employment History	4 - 5
Disclosure Information	6



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

### ZACHARY STUART BRODT (CRD# 5228473)

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 **10/03/2024**.

### CURRENT EMPLOYERS

Firm	CRD#	Registered Since
IA SL CAPITAL	CRD# 328450	11/16/2023

### 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 FOUNDATIONS INVESTMENT ADVISORS LLC	175083	Scottsdale, AZ	05/11/2022 - 03/01/2024
IA FIRST FINANCIAL EQUITY CORPORATION	16507	SCOTTSDALE, AZ	04/22/2016 - 04/22/2022
B FIRST FINANCIAL EQUITY CORPORATION	16507	SCOTTSDALE, AZ	04/21/2016 - 09/13/2018

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
Criminal	1
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: **SL CAPITAL**  
Main Address: 20707 N PIMA RD  
STE 205  
SCOTTSDALE, AZ 85255  
Firm ID#: 328450

Regulator	Registration	Status	Date
 Arizona	Investment Adviser Representative	Approved	12/06/2023
 Texas	Investment Adviser Representative	Restricted Approval	11/16/2023

### Branch Office Locations

**SL CAPITAL**  
20707 N PIMA RD  
STE 205  
SCOTTSDALE, AZ 85255



## 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>B</b> Securities Industry Essentials Examination (SIE)	SIE	09/13/2018
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<b>B</b> General Securities Representative Examination (S7)	Series 7	01/26/2007
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#### State Securities Law Exams

Exam	Category	Date
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<b>B</b> Uniform Securities Agent State Law Examination (S63)	Series 63	04/11/2007
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<b>IA</b> Uniform Investment Adviser Law Examination (S65)	Series 65	08/25/2006
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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	05/11/2022 - 03/01/2024	FOUNDATIONS INVESTMENT ADVISORS LLC	CRD# 175083	Scottsdale, AZ
IA	04/22/2016 - 04/22/2022	FIRST FINANCIAL EQUITY CORPORATION	CRD# 16507	SCOTTSDALE, AZ
B	04/21/2016 - 09/13/2018	FIRST FINANCIAL EQUITY CORPORATION	CRD# 16507	SCOTTSDALE, AZ
IA	06/26/2014 - 04/18/2016	RAYMOND JAMES & ASSOCIATES, INC.	CRD# 705	SCOTTSDALE, AZ
B	06/20/2014 - 04/18/2016	RAYMOND JAMES & ASSOCIATES, INC.	CRD# 705	SCOTTSDALE, AZ
IA	06/16/2010 - 07/18/2014	GENTRY ASSET ADVISORY LLC	CRD# 153902	SCOTTSDALE, AZ
B	02/27/2012 - 06/23/2014	ACCELERATED CAPITAL GROUP	CRD# 41270	SCOTTSDALE, AZ
B	05/21/2008 - 02/24/2012	MERIDIAN UNITED CAPITAL, LLC	CRD# 122924	SCOTTSDALE, AZ
IA	06/02/2008 - 03/28/2011	THE PLANNING GROUP	CRD# 113887	SCOTTSDALE, AZ
B	01/31/2007 - 06/17/2008	G.F. INVESTMENT SERVICES, LLC	CRD# 132939	SCOTTSDALE, AZ
IA	11/14/2006 - 06/17/2008	GLOBAL FINANCIAL PRIVATE CAPITAL, LLC	CRD# 132070	SCOTTSDALE, AZ

### 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
07/2022 - Present	SL Capital	President/IAR	Y	Scottsdale, AZ, United States
04/2022 - Present	FOUNDATIONS INVESTMENT ADVISORS, LLC	INVESTMENT ADVISER REPRESENTATIVE	Y	SCOTTSDALE, AZ, United States
04/2016 - 04/2022	First Financial Equity Corporation	Financial Advisor	Y	Scottsdale, AZ, United States



## Registration & Employment History

### EMPLOYMENT HISTORY

### 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.) SL Capital; Investment Related; Scottsdale, AZ; RIA; President/IAR; Start Date 07/2022; Approx. 80 hours with all hours during securities trading hours
- 2.) Foundations Investment Advisors; Investment Related; Scottsdale, AZ; RIA; IAR; Start Date 04/2022; Approx. 80 hours with all hours during securities trading hours



## 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
Criminal	1
Customer Dispute	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 1

**Reporting Source:** Regulator

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:**

**Date Initiated:** 05/17/2018

**Docket/Case Number:** [2015044197601](#)

**Employing firm when activity occurred which led to the regulatory action:** Accelerated Capital Group and First Financial Equity Corporation

**Product Type:** No Product

**Allegations:** Without admitting or denying the findings, Brodt consented to the sanctions and to the entry of findings that on five occasions, while he was registered with his member firm, but looking to transition to a new broker-dealer, Brodt sent emails containing nonpublic personal customer information to non-affiliated third parties without the customers' knowledge and consent. The findings stated that the third parties included two non-affiliated broker-dealers Brodt was considering transitioning to, as well as a financial recruiting firm that was assisting him with his transition. In certain instances, the nonpublic personal information Brodt sent to third parties included customer account numbers, investment names, investment values and the value of customer accounts. On at least one occasion, Brodt sent nonpublic personal customer information belonging to customers whose accounts he did not service. The findings also stated that Brodt willfully failed to timely update his Uniform Application for Securities Industry Registration or Transfer (Form U4) to disclose a misdemeanor charge and guilty plea. Brodt was aware



that he might be required to make disclosure, but failed to timely take appropriate steps to confirm his obligation or otherwise disclose the charge or guilty plea on his Form U4. Brodt completed three compliance forms in which he failed to disclose that he had been arrested for and had pled guilty to a misdemeanor.

**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:**

05/17/2018

**Sanctions Ordered:**

Civil and Administrative Penalty(ies)/Fine(s)  
Suspension

Other: The settlement includes a finding that Brodt willfully failed to disclose a material fact on a Form U4, and that under Section 3(a)(39)(F) of the Securities Exchange Act of 1934 and Article III, Section 4 of the FINRA By-Laws, this omission make him subject to a statutory disqualification with respect to association with a member.

**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**

<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	All capacities
<b>Duration:</b>	three months
<b>Start Date:</b>	06/04/2018
<b>End Date:</b>	09/03/2018

**Monetary Sanction 1 of 1**

<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$10,000.00
<b>Portion Levied against individual:</b>	\$10,000.00
<b>Payment Plan:</b>	
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	06/01/2018
<b>Was any portion of penalty waived?</b>	No

**Amount Waived:****Regulator Statement** Fines paid in full on June 1, 2018.  
.....**Reporting Source:** Individual**Regulatory Action Initiated By:** FINRA**Sanction(s) Sought:** Civil and Administrative Penalty(ies)/Fine(s)  
Suspension**Date Initiated:** 05/17/2018**Docket/Case Number:** [2015044197601](#)**Employing firm when activity occurred which led to the regulatory action:** Accelerated Capital Group**Product Type:** No Product**Allegations:** Disclosure of nonpublic personal customer information and willful failure to timely amend Form U4 to report a misdemeanor charge and guilty plea.**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?** Yes**Resolution Date:** 05/17/2018**Sanctions Ordered:** Civil and Administrative Penalty(ies)/Fine(s)  
Suspension**Sanction 1 of 1****Sanction Type:** Suspension**Capacities Affected:** All capacities**Duration:** Three months**Start Date:** 06/04/2018**End Date:** 09/03/2018**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:** 06/01/2018



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:** CITY COURT  
**Name of Court:** SCOTTSDALE CITY COURT  
**Location of Court:** SCOTTSDALE, ARIZONA  
**Docket/Case #:** M-0751-CR-2010034444  
**Charge Date:** 11/02/2010  
**Charge(s) 1 of 1**  
**Formal Charge(s)/Description:** SHOPLIFTING-REMOVAL OF GOODS  
**No of Counts:** 1  
**Felony or Misdemeanor:** Misdemeanor  
**Plea for each charge:** N/A  
**Disposition of charge:** Pled guilty  
**Current Status:** Final  
**Status Date:** 01/23/2012  
**Disposition Date:** 01/23/2012  
**Sentence/Penalty:** COMPLAINT DISMISSED BY CITY ATTORNEY

**Broker Statement**  
In 2010, I was charged with shoplifting when a person I was shopping with removed items from a store without payment. I did not personally remove any items and was entirely unaware that the person I was shopping with did so. My legal counsel advised me that the quickest method to resolve this issue was to simply agree to a diversion even though I had not engaged in the conduct. Counsel further advised that it was not the same as pleading guilty to the charge. I followed my counsel's advice without knowing that by doing so I was actually admitting guilt. In hindsight, I would have contested the charges because I did not engage in the alleged conduct.



## 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

<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	Accelerated Capital Group, Inc/Ashton Thomas Private Wealth LLC/Gentry Asset Advisory/Peachcap Securities Inc.
<b>Allegations:</b>	Breach of fiduciary duty and failed to properly conduct due diligence with respect to the investment recommendations and intentionally and fraudulently misrepresented to and omitted from Claimants, registered with a previous firm, Accelerated Capital from 2012-2013 also, Aston Thomas registered 3-2010 to 5-2014.
<b>Product Type:</b>	Other: Non-Public trading company
<b>Alleged Damages:</b>	\$400,000.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	Investments totaled approximately \$400,000. Claimants are seeking unspecified compensatory damages together with punitive damages, pre-judgment interest, post-judgment and all costs and fees Claimants incur in connection with the instant proceeding, including attorneys fees.
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	Yes
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	Yes
<b>Arbitration/Reparation forum or court name and location:</b>	Mesa Arizona
<b>Docket/Case #:</b>	unknown
<b>Filing date of arbitration/CFTC reparation or civil litigation:</b>	09/25/2019

## Customer Complaint Information

<b>Date Complaint Received:</b>	11/06/2019
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	01/28/2021
<b>Settlement Amount:</b>	\$17,500.00
<b>Individual Contribution Amount:</b>	\$17,500.00
<b>Broker Statement</b>	This matter was settled due to the cost of litigating. I was not the advisor of record for this customer.



## End of Report

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