



IAPD Report

CLIFF S DUESTER

CRD# 5634190

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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

CLIFF S DUESTER (CRD# 5634190)

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 **11/17/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	HORNOR, TOWNSEND & KENT, LLC	CRD# 4031	07/07/2023
IA	HORNOR, TOWNSEND & KENT, LLC	CRD# 4031	07/07/2023

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **29** 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	MML INVESTORS SERVICES, LLC	10409	LOS ANGELES, CA	03/05/2015 - 07/19/2023
B	MML INVESTORS SERVICES, LLC	10409	LOS ANGELES, CA	02/26/2015 - 07/19/2023
IA	PARK AVENUE SECURITIES LLC	46173	SAN DIEGO, CA	12/20/2013 - 10/06/2014

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 **29** jurisdiction(s) and 1 SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **HORNOR, TOWNSEND & KENT, LLC**
Main Address: 161 WASHINGTON STREET
CONSHOHOCKEN, PA 19428
Firm ID#: 4031

	Regulator	Registration	Status	Date
B	FINRA	General Securities Representative	Approved	07/07/2023
B	Arizona	Agent	Approved	09/08/2023
B	Arkansas	Agent	Approved	09/18/2024
IA	California	Investment Adviser Representative	Approved	07/07/2023
B	California	Agent	Approved	07/12/2023
B	Colorado	Agent	Approved	07/13/2023
B	Connecticut	Agent	Approved	06/18/2024
B	Florida	Agent	Approved	07/10/2023
B	Georgia	Agent	Approved	07/12/2024
B	Hawaii	Agent	Approved	09/17/2024
B	Illinois	Agent	Approved	01/13/2025
B	Maine	Agent	Approved	09/17/2024
B	Maryland	Agent	Approved	09/26/2024



Qualifications

Regulator	Registration	Status	Date
B Massachusetts	Agent	Approved	10/30/2024
B Michigan	Agent	Approved	10/04/2024
B Nebraska	Agent	Approved	09/18/2024
B New Hampshire	Agent	Approved	09/18/2024
B New Mexico	Agent	Approved	10/09/2024
B New York	Agent	Approved	08/19/2023
B North Carolina	Agent	Approved	08/27/2024
B Ohio	Agent	Approved	04/02/2025
B Oregon	Agent	Approved	10/04/2024
B Pennsylvania	Agent	Approved	09/27/2024
B Rhode Island	Agent	Approved	09/17/2024
B Tennessee	Agent	Approved	03/07/2025
B Texas	Agent	Approved	07/12/2023
IA Texas	Investment Adviser Representative	Restricted Approval	07/12/2023
B Utah	Agent	Approved	08/23/2023
B Virginia	Agent	Approved	07/20/2023
B Washington	Agent	Approved	12/18/2024
B Wisconsin	Agent	Approved	11/22/2024



Qualifications

Regulator	Registration	Status	Date
B Wyoming	Agent	Approved	09/10/2024

Branch Office Locations

HORNOR, TOWNSEND & KENT, LLC
30 VESEY ST
9TH FLOOR
NEW YORK, NY 10007

HORNOR, TOWNSEND & KENT, LLC
2 EMBARCADERO CENTER
9TH FLR
SAN FRANCISCO, CA 94111

HORNOR, TOWNSEND & KENT, LLC
520 BROADWAY
SUITE 200
SANTA MONICA, CA 90401



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	10/01/2018
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B General Securities Representative Examination (S7)	Series 7	04/17/2009
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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	10/15/2009
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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	03/05/2015 - 07/19/2023	MML INVESTORS SERVICES, LLC	CRD# 10409	LOS ANGELES, CA
B	02/26/2015 - 07/19/2023	MML INVESTORS SERVICES, LLC	CRD# 10409	LOS ANGELES, CA
IA	12/20/2013 - 10/06/2014	PARK AVENUE SECURITIES LLC	CRD# 46173	SAN DIEGO, CA
B	11/19/2013 - 10/06/2014	PARK AVENUE SECURITIES LLC	CRD# 46173	SAN DIEGO, CA
IA	07/18/2013 - 09/27/2013	ANDINA CAPITAL MANAGEMENT, LLC	CRD# 151762	SAN DIEGO, CA
IA	11/10/2009 - 07/05/2013	PARK AVENUE SECURITIES LLC	CRD# 46173	SAN DIEGO, CA
B	04/20/2009 - 07/05/2013	PARK AVENUE SECURITIES LLC	CRD# 46173	SAN DIEGO, 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
07/2023 - Present	HORNOR, TOWNSEND, & KENT LLC	REGISTERED REPRESENTATIVE	Y	HORSHAM, PA, United States
05/2023 - Present	PENN MUTUAL LIFE INSURANCE COMPANY	AGENT	Y	HORSHAM, PA, United States
02/2015 - 07/2023	MML INVESTORS SERVICES	REGISTERED REPRESENTATIVE	Y	LOS ANGELES, CA, United States
10/2014 - 07/2023	LENOX ADVISORS, INC/MASS MUTUAL	RELATIONSHIP MANAGER	Y	LOS ANGELES, CA, United States
10/2014 - 07/2023	MASS MUTUAL LIFE INSURANCE COMPANY	AGENT	Y	LOS ANGELES, CA, United States



Registration & 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) NAME OF ACTIVITY INSURANCE SALES & SERVICE | INVESTMENT RELATED: YES | DBA NAME: PRIVATE LABEL WEALTH MANAGEMENT | POSITION HELD: AGENT/FOUNDER | ADDRESS: 30 VESEY ST, 9TH FLOOR, NEW YORK, NY 10007 | START DATE: 07/06/2023 | NATURE OF ACTIVITY: INSURANCE BROKERAGE | APPROX HRS PER MTH: 50 | APPROX TRADING HRS PER MTH: 40 | DESCRIPTION OF DUTIES: INSURANCE BROKERAGE DESCRIPTION OF DUTIES: INSURANCE SALES AND SERVICE INCLUDING PENN MUTUAL LIFE PRODUCTS." PRIVATE LABEL WEALTH MANAGEMENT USED AS A MARKETING NAME ONLY

2) TAX MITIGATION & MANAGEMENT | DBA: Park Hill | POSITION: Consultant | NATURE: Tax Mitigation & Management | INVESTMENT RELATED: No NUMBER OF HOURS: 5 SECURITIES TRADING HOURS: 2 START DATE: 11/15/2025 | ADDRESS: 520 Broadway, Floor 2, Santa Monica CA 90401 | DESCRIPTION: Tax Mitigation & Management



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:	MML INVESTORS SERVICES, LLC
Allegations:	The complainant alleges that his representative misrepresented the whole life insurance policy issued on August 09, 2017. The complainant states his representative had him fund the whole life policy with money from his inherited IRA and failed to explain the tax implication of withdrawing from the IRA.
Product Type:	Insurance Mutual Fund
Alleged Damages:	\$0.00
Alleged Damages Amount Explanation (if amount not exact):	The firm has been unable to determine that damages would be less than \$5000.
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:	04/20/2020
Complaint Pending?	No
Status:	Denied



Status Date:	05/14/2020
Settlement Amount:	
Individual Contribution Amount:	
Broker Statement	Internal case #202037165.



End of Report

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