



## IAPD Report

# James Bates Pugh Jr

CRD# 6949266

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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

### James Bates Pugh Jr (CRD# 6949266)

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 **08/08/2025**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
<b>IA</b>	PIVOT CAPITAL PARTNERS LLC	CRD# 335324	05/07/2025

### 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
<b>B</b>	STONEHAVEN, LLC	118913	NEW YORK, NY	01/14/2025 - 08/08/2025
<b>B</b>	STIRLINGSHIRE INVESTMENTS	310576	NEW YORK CITY, NY	03/27/2024 - 10/17/2024
<b>B</b>	FINALIS SECURITIES LLC	305908	NEW YORK, NY	10/07/2021 - 04/11/2024

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
Judgment/Lien	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 1

Firm Name: **PIVOT CAPITAL PARTNERS LLC**  
Main Address: 181 W. MADISON STREET  
SUITE 4700  
CHICAGO, IL 60602  
Firm ID#: 335324

	Regulator	Registration	Status	Date
	Georgia	Investment Adviser Representative	Approved	05/07/2025
	Illinois	Investment Adviser Representative	Approved	05/07/2025

### Branch Office Locations

**PIVOT CAPITAL PARTNERS LLC**  
Atlanta, GA




## 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 1 principal/supervisory exam, 3 general industry/product exams, and 2 state securities law exams.**



#### Principal/Supervisory Exams

	Exam	Category	Date
	General Securities Principal Examination (S24)	Series 24	11/21/2022

#### General Industry/Product Exams

	Exam	Category	Date
	Investment Banking Registered Representative Examination (S79TO)	Series 79TO	04/15/2021
	General Securities Representative Examination (S7TO)	Series 7TO	11/07/2018
	Securities Industry Essentials Examination (SIE)	SIE	11/07/2018

#### State Securities Law Exams

	Exam	Category	Date
	Uniform Investment Adviser Law Examination (S65)	Series 65	04/16/2025
	Uniform Securities Agent State Law Examination (S63)	Series 63	01/05/2019

### 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	01/14/2025 - 08/08/2025	STONEHAVEN, LLC	CRD# 118913	NEW YORK, NY
B	03/27/2024 - 10/17/2024	STIRLINGSHIRE INVESTMENTS	CRD# 310576	NEW YORK CITY, NY
B	10/07/2021 - 04/11/2024	FINALIS SECURITIES LLC	CRD# 305908	NEW YORK, NY
B	03/19/2021 - 08/31/2021	BUNDY GROUP SECURITIES, LLC	CRD# 311375	CHARLOTTE, NC
B	11/17/2020 - 12/15/2020	MML INVESTORS SERVICES, LLC	CRD# 10409	ATLANTA, GA
B	08/09/2019 - 02/26/2020	ALLSTATE FINANCIAL SERVICES, LLC	CRD# 18272	Opelika, AL
B	11/07/2018 - 05/22/2019	NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC	CRD# 2881	BIRMINGHAM, AL

### 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
04/2025 - Present	Pivot Capital Partners, LLC	Partner	Y	Chicago, IL, United States
09/2021 - Present	Pivot Capital, LLC	Partner	Y	Chicago, IL, United States
03/2024 - 10/2024	Stirlingshire Investments	Registered Representative	Y	NYC, NY, United States
10/2021 - 03/2024	FINALIS SECURITIES LLC	Registered Representative	Y	Corte Madera, CA, United States
03/2021 - 09/2021	BUNDY GROUP SECURITIES, LLC	Vice President of Business Development	Y	CHARLOTTE, NC, United States
03/2020 - 03/2021	MML Investors Services, LLC	Registered Representative	Y	Atlanta, GA, United States
03/2019 - 03/2020	Allstate Financial Services, LLC	Financial Advisor/Registered Representative	Y	Auburn, AL, United States



## Registration & Employment History

### EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
03/2018 - 03/2019	Northwestern Mutual Investment Services, LLC	Financial Advisor/Registered Representative	Y	Auburn, AL, United States
07/2012 - 03/2019	Pugh Engineering Services LLC	Director of Operations	N	Cullman, AL, 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) Pivot Capital Partners Consulting LLC; Investment related; 161 North Clark Street, Chicago, IL 60601; Partner; 10 hours during trading hours; Provides exit advisory services
- (2) RPJ Financial LLC; Not investment related; 161 North Clark Street, Chicago, IL 60601; Holding Company; Partner; 07/06/2023; 20 hours during trading hours; Management and Oversight of Subsidiary Operating Companies.
- (3) PTF Group LLC; investment related; 161 North Clark Street, Suite 1600, Chicago, IL 60601; Management Group of Investment Related Subsidiaries on behalf of RPJ Financial (Holding Company); Managing Member; 07/17/2023; 10 hours per month during trading hours; 50% Shareholder of PTF Group LLC
- (4) Pivot Capital, LLC - Investment Related - Partner - sourcing and selling suitable private investment offerings to qualified investors - Approx 160 hours/month
- (5) PTF Global, LLC - Not Investment Related - Manager - Direct Investment Vehicle Under PTF Group, LLC. Investment into a future Buy/Sell Trade Contract. currently zero hours/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
Judgment/Lien	2

### Judgment/Lien

This disclosure event involves an unsatisfied and outstanding judgment or lien against the Investment Adviser Representative.

#### Disclosure 1 of 2

<b>Reporting Source:</b>	Individual
<b>Judgment/Lien Holder:</b>	State of Alabama
<b>Judgment/Lien Amount:</b>	\$1,340.08
<b>Judgment/Lien Type:</b>	Tax
<b>Date Filed with Court:</b>	09/22/2021
<b>Date Individual Learned:</b>	10/11/2021
<b>Type of Court:</b>	Provided in addition to the other filing by the state of Alabama. James provided a copy of the "final notice before seizure"
<b>Name of Court:</b>	State Of Alabama
<b>Location of Court:</b>	Montgomery
<b>Docket/Case #:</b>	409895
<b>Judgment/Lien Outstanding?</b>	Yes
<b>Broker Statement</b>	James informed us he has spoken with the State of Alabama and has agreed to a combined payment arrangement to exhaust both of these past due liabilities. He has been told that the agreement documents will be placed in the mail and sent to his current address. Please let us know if any additional information is needed. Thank you.

#### Disclosure 2 of 2

<b>Reporting Source:</b>	Individual
<b>Judgment/Lien Holder:</b>	State of Alabama Department of Revenue
<b>Judgment/Lien Amount:</b>	\$4,933.89
<b>Judgment/Lien Type:</b>	Tax
<b>Date Filed with Court:</b>	07/14/2021



<b>Date Individual Learned:</b>	10/11/2021
<b>Type of Court:</b>	State Court
<b>Name of Court:</b>	Alabama State
<b>Location of Court:</b>	Montgomery
<b>Docket/Case #:</b>	BK5637PG15
<b>Judgment/Lien Outstanding?</b>	Yes
<b>Broker Statement</b>	James has called the state of Alabama and setup a payment plan. He will forward the paperwork from the state when he receives it by regular mail. Please let us know if any additional information is needed. Thank you.



## End of Report

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