

**BrokerCheck Report**

**JILL M CODY**

CRD# 4333419

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## About BrokerCheck®

BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.
- Please note that the information contained in a BrokerCheck 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 broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

- **Where did this information come from?**

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
  - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
  - information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <http://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

Thank you for using FINRA BrokerCheck.



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at

[brokercheck.finra.org](http://brokercheck.finra.org)



For additional information about the contents of this report, please refer to the User Guidance or [www.finra.org/brokercheck](http://www.finra.org/brokercheck). It provides a glossary of terms and a list of frequently asked questions, as well as additional resources.

[For more information about FINRA, visit www.finra.org.](http://www.finra.org)

**JILL M. CODY**

CRD# 4333419

This broker is not currently registered.

## Report Summary for this Broker



This report summary provides an overview of the broker's professional background and conduct. Additional information can be found in the detailed report.

### Broker Qualifications

**This broker is not currently registered.**

#### This broker has passed:

- 0 Principal/Supervisory Exams
- 1 General Industry/Product Exam
- 1 State Securities Law Exam

### Registration History

**This broker was previously registered with the following securities firm(s):**

**CONCORDE INVESTMENT SERVICES, LLC**  
 CRD# 151604  
 SPRING LAKE, NJ  
 01/2013 - 08/2016

**WESTMINSTER FINANCIAL SECURITIES, INC.**  
 CRD# 20677  
 PROVIDENCE, RI  
 12/2012 - 01/2013

**COLUMBIA MANAGEMENT INVESTMENT DISTRIBUTORS, INC.**  
 CRD# 840  
 BOSTON, MA  
 05/2010 - 05/2012

### Disclosure Events

All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

Are there events disclosed about this broker? **Yes**

**The following types of disclosures have been reported:**

Type	Count
Regulatory Event	1
Investigation	1
Customer Dispute	6

### Investment Adviser Representative Information

The information below represents the individual's record as a broker. For details on this individual's record as an investment adviser representative, visit the SEC's Investment Adviser Public Disclosure website at

<https://www.adviserinfo.sec.gov>



## Broker Qualifications

### Registrations

This section provides the self-regulatory organizations (SROs) and U.S. states/territories the broker is currently registered and licensed with, the category of each license, and the date on which it became effective. This section also provides, for every brokerage firm with which the broker is currently employed, the address of each branch where the broker works.

This broker is not currently registered.



## Broker Qualifications

### Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below.

**This individual has passed 0 principal/supervisory exams, 1 general industry/product exam, and 1 state securities law exam.**

### Principal/Supervisory Exams

Exam	Category	Date
No information reported.		

### General Industry/Product Exams

Exam	Category	Date
General Securities Representative Examination	Series 7	06/01/2001

### State Securities Law Exams

Exam	Category	Date
Uniform Combined State Law Examination	Series 66	12/08/2008

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at [www.finra.org/brokerqualifications/registeredrep/](http://www.finra.org/brokerqualifications/registeredrep/).



## Registration and Employment History

### Registration History

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
01/2013 - 08/2016	CONCORDE INVESTMENT SERVICES, LLC	151604	SPRING LAKE, NJ
12/2012 - 01/2013	WESTMINSTER FINANCIAL SECURITIES, INC.	20677	PROVIDENCE, RI
05/2010 - 05/2012	COLUMBIA MANAGEMENT INVESTMENT DISTRIBUTORS, INC.	840	BOSTON, MA
10/2008 - 05/2010	COLUMBIA MANAGEMENT DISTRIBUTORS, INC.	30683	BOSTON, MA
03/2007 - 10/2008	PARK AVENUE SECURITIES LLC	46173	MANASQUAN, NJ
06/2001 - 09/2006	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	7691	NEW YORK, NY

### Employment History

This section provides up to 10 years of an individual broker's employment history as reported by the individual broker on the most recently filed Form U4.

**Please note that the broker is required to provide this information only while registered with FINRA or a national securities exchange and the information is not updated via Form U4 after the broker ceases to be registered. Therefore, an employment end date of "Present" may not reflect the broker's current employment status.**

Employment Dates	Employer Name	Employer Location
01/2013 - Present	CONCORDE ASSET MANAGEMENT, LLC	TROY, MI
01/2013 - Present	CONCORDE INVESTMENT SERVICES, LLC	TROY, MI
11/2012 - 01/2013	WESTMINSTER FINANCIAL SECURITIES	VANDALIA, OH
05/2012 - 11/2012	UNEMPLOYED	SPRING LAKE, NJ
05/2010 - 05/2012	RIVERSOURCE FUND DISTRIBUTORS, INC.	BOSTON, MA
05/2010 - 05/2012	RIVERSOURCE INVESTMENTS	MINNEAPOLIS, MN
10/2008 - 05/2012	COLUMBIA MANAGEMENT ADVISORS, LLC	BOSTON, MA
10/2008 - 05/2012	COLUMBIA MANAGEMENT GROUP	BOSTON, MA
03/2007 - 10/2008	PARK AVENUE SECURITIES	MANASQUAN, NJ
02/2007 - 10/2008	THE GUARDIAN LIFE INS. CO.	MANASQUAN, NJ



## Registration and Employment History

### Employment History, continued

Employment Dates	Employer Name	Employer Location
09/2006 - 10/2008	C&A FINANCIAL GROUP/GUARDIAN	MANASQUAN, NJ

### Other Business Activities

This section includes information, if any, as provided by the broker regarding other business activities the broker 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) BOSTON INVESTMENT PARTNERS. FINANCIAL ADVISOR. START DATE JANUARY 2013. DBA FOR SECURITIES BUSINESS. SPRING LAKE, NJ.
- 2) INVESTMENT ADVISOR REP WITH CONCORDE ASSET MANAGEMENT. START DATE JANUARY 2013. INVESTMENT RELATED. SALES AND SERVICE. SPRING LAKE, NJ. FULL TIME DURING BUSINESS HOURS.
- 3) LIFE/HEALTH INSURANCE SALES THROUGH DBA BOSTON INVESTMENT PARTNERS. SPRING LAKE, NJ. NON INVESTMENT RELATED. 1-5 HOURS/MONTH DURING BUSINESS HOURS.
- 4) Concorde Insurance Agency; SPRING LAKE, NJ. Insurance Agent; provide insurance services to clients when appropriate. No client conflict.



## Disclosure Events

### What you should know about reported disclosure events:

1. All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
  - A law enforcement agency must file formal charges before a broker is required to disclose a particular criminal event.
  - A customer dispute must involve allegations that a broker engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.
  -
3. **Disclosure events in BrokerCheck reports come from different sources:**
  - As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, brokerage 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 BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
  -
4. **There are different statuses and dispositions for disclosure events:**
  - A disclosure event may have a status of *pending*, *on appeal*, or *final*.
    - A "pending" event involves allegations that have not been proven or formally adjudicated.
    - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
    - A "final" event has been concluded and its resolution is not subject to change.
  - A final 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 involves an agreement by the parties to resolve the matter. Please note that brokers and brokerage firms may choose to settle customer disputes or regulatory matters for business or other reasons.
    - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.

**For your convenience, below is a matrix of the number and status of disclosure events involving this broker. Further information regarding these events can be found in the subsequent pages of this report. You also may wish to contact the broker to obtain further information regarding these events.**

	Pending	Final	On Appeal
Regulatory Event	0	1	0





Customer Dispute	6	0	N/A
Investigation	1	N/A	N/A



## Disclosure Event Details

When evaluating this information, please keep in mind that a disclosure event may be pending or involve allegations that are contested and have not been resolved or proven. The matter may, in the end, be withdrawn, dismissed, resolved in favor of the broker, or concluded through a negotiated settlement for certain business reasons (e.g., to maintain customer relationships or to limit the litigation costs associated with disputing the allegations) with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to CRD and therefore some of the specific data fields contained in the report may be blank if the information was not provided to CRD.

### Regulatory - Final

This type of disclosure event may involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory such as the Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of a broker'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:** 02/23/2017

**Docket/Case Number:** [2016051816301](#)

**Employing firm when activity occurred which led to the regulatory action:** Concorde Investment Services, LLC

**Product Type:** No Product

**Allegations:** Without admitting or denying the findings, Tramontano consented to the sanction and to the entry of findings that she permitted another individual, who had been suspended by FINRA, to engage in securities business while suspended. The findings stated that the individual chose not to inform most of his customers that he was going to be suspended; instead, he told his customers that Tramontano would be working with him. Over the next year, Tramontano was aware that the individual continued to engage in the securities industry while suspended by, among other things, communicating with customers, making securities recommendations to them, and placing trades on their behalf. Indeed, the individual, by using Tramontano as the broker of record, was able to continue to act as a registered



representative, unabated, in nearly all respects during his year-long suspension.

**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:**

02/23/2017

**Sanctions Ordered:**

Bar (Permanent)

**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>	Bar (Permanent)
<b>Capacities Affected:</b>	Any capacity
<b>Duration:</b>	N/A
<b>Start Date:</b>	02/23/2017
<b>End Date:</b>	



## Investigation

This type of disclosure event involves any ongoing formal investigation by an entity such as a grand jury state or federal agency, self-regulatory organization or foreign regulatory authority. Subpoenas, preliminary or routine regulatory inquiries, and general requests by a regulatory entity for information are not considered investigations and therefore are not included in a BrokerCheck report.

### Disclosure 1 of 1

<b>Reporting Source:</b>	Firm
<b>Initiated By:</b>	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
<b>Notice Date:</b>	10/28/2016
<b>Details:</b>	SEC investigation to determine if there have been violations of the federal securities laws.
<b>Is Investigation pending?</b>	Yes



## Customer Dispute - Pending

This type of disclosure event involves (1) a pending consumer-initiated, investment-related arbitration or civil suit that contains allegations of sales practice violations against the broker; or (2) a pending, consumer-initiated, investment-related written complaint containing allegations that the broker engaged in, sales practice violations resulting in compensatory damages of at least \$5,000, forgery, theft, or misappropriation, or conversion of funds or securities.

### Disclosure 1 of 6

<b>Reporting Source:</b>	Firm
<b>Employing firm when activities occurred which led to the complaint:</b>	Merrill Lynch; Park Avenue Securities; Columbia Management, Westminster Financial Securities, Inc.; Concorde Investment Services, LLC
<b>Allegations:</b>	Jill is listed as a related party on claim. Clients are alleging misappropriation and forgery in relation to investments made from 2002 to 2016.
<b>Product Type:</b>	Other: general securities and investments
<b>Alleged Damages:</b>	\$0.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	Alleged damages unknown but expected to exceed \$5,000.00
<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>	No

### Customer Complaint Information

<b>Date Complaint Received:</b>	12/22/2016
<b>Complaint Pending?</b>	Yes
<b>Settlement Amount:</b>	
<b>Individual Contribution Amount:</b>	

### Disclosure 2 of 6

<b>Reporting Source:</b>	Firm
<b>Employing firm when activities occurred which led to the complaint:</b>	Westminster Financial Securities, Inc. and Concorde Investment Services, LLC.



<b>Allegations:</b>	Client is alleging that funds belonging to the client were taken by representative. Time period is unclear but we believe it covers 2012 to present.
<b>Product Type:</b>	Equity-OTC
<b>Alleged Damages:</b>	\$0.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	Damages are unspecified however firm has made a good faith determination that damages alleged exceed \$5,000.00.
<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>	No

### Customer Complaint Information

<b>Date Complaint Received:</b>	12/20/2016
<b>Complaint Pending?</b>	Yes
<b>Settlement Amount:</b>	
<b>Individual Contribution Amount:</b>	

### Disclosure 3 of 6

<b>Reporting Source:</b>	Firm
<b>Employing firm when activities occurred which led to the complaint:</b>	Westminster Financial Securities, Inc. and Concorde Investment Services, LLC.
<b>Allegations:</b>	Client is alleging that funds belonging to the client were taken by representative. Time period is unclear but we believe it covers 2013 to present.
<b>Product Type:</b>	Equity-OTC
<b>Alleged Damages:</b>	\$0.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	Damages are unspecified however firm has made a good faith determination that damages alleged exceed \$5,000.00.
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	Yes



**Is this an arbitration/CFTC  
reparation or civil litigation?** No

### Customer Complaint Information

**Date Complaint Received:** 01/18/2017

**Complaint Pending?** Yes

**Settlement Amount:**

**Individual Contribution  
Amount:**

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### Disclosure 4 of 6

**Reporting Source:** Firm

**Employing firm when  
activities occurred which led  
to the complaint:** Westminster Financial Securities, Inc. and Concorde Investment Services, LLC.

**Allegations:** Clients are alleging that funds belonging to the client were taken by representative. Time period is unclear but we believe it covers 2012 to present.

**Product Type:** Equity-OTC

**Alleged Damages:** \$0.00

**Alleged Damages Amount  
Explanation (if amount not  
exact):** Damages are unspecified however firm has made a good faith determination that damages alleged exceed \$5,000.00.

**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:** 11/28/2016

**Complaint Pending?** Yes

**Settlement Amount:**

**Individual Contribution  
Amount:**

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### Disclosure 5 of 6

<b>Reporting Source:</b>	Firm
<b>Employing firm when activities occurred which led to the complaint:</b>	Westminster Financial Securities, Inc. and Concorde Investment Services, LLC.
<b>Allegations:</b>	Clients are alleging that funds belonging to the client were taken by representative. Time period is unclear but we believe it covers 2012 to present.
<b>Product Type:</b>	Equity-OTC
<b>Alleged Damages:</b>	\$0.00
<b>Alleged Damages Amount Explanation (if amount not exact):</b>	Damages are unspecified however firm has made a good faith determination that damages alleged exceed \$5,000.00.
<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>	No

### Customer Complaint Information

<b>Date Complaint Received:</b>	11/28/2016
<b>Complaint Pending?</b>	Yes
<b>Settlement Amount:</b>	
<b>Individual Contribution Amount:</b>	

### Disclosure 6 of 6

<b>Reporting Source:</b>	Broker
<b>Employing firm when activities occurred which led to the complaint:</b>	Concorde Investment Services, LLC
<b>Allegations:</b>	Registered Reps [other firm employee] and Jill Cody received inaccurate information from Lincoln Financial. That information was passed unknowingly on to the client. However, the client received corrected information from Lincoln in time to correct any mistake but took no action to remedy the problem. [other firm employee] and Jill did not receive the corrected information until weeks after the client did and as a result did not have the opportunity themselves to fix the issue



as the 30 day window had expired. Activities occurred from 2013-2015.

**Product Type:** Annuity-Variable

**Alleged Damages:** \$160,000.00

**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:** 09/04/2015

**Complaint Pending?** No

**Status:** Evolved into Arbitration/CFTC reparation (the individual is a named party)

**Status Date:** 10/23/2015

**Settlement Amount:**

**Individual Contribution Amount:**

### Arbitration Information

**Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):** FINRA

**Docket/Case #:** 15-02545

**Date Notice/Process Served:** 10/23/2015

**Arbitration Pending?** Yes

### Broker Statement

[customer] requested that annuity funds be distributed immediately due to a financial emergency. [other firm employee] or Jill were not agents of record on the annuity. However, in the interest of helping a client, they helped [customer] facilitate the withdrawal. The [customers] were informed by the Annuity company that they violated a condition of a Rider on their policy. They were also informed they had 30 days from the time of withdrawal to fix the error and restore the policy. The [customers] did nothing. The annuity company never informed [other firm employee] or Jill of the violation prior to the distribution. Although they were already aware of the violation, The [customers] did not inform [other firm employee] or Jill of the violation until after the 30 day period expired. Although the [customers] feel that [other firm employee] or Jill should have known about the rider rule prior to the withdrawal, there was no way for them to know without



information from the annuity company or the [customers] as they did not sell the [customers] the policy. That information was never provided. The [customers] had invested in the policy in 2007.

## End of Report



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