

BrokerCheck Report

ROBERT RUSSEL TWEED

CRD# 2339324

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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 <https://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



For additional information about the contents of this report, please refer to the User Guidance or 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)

**ROBERT R. TWEED**

CRD# 2339324

Currently employed by and registered with the following Firm(s):**CABOT LODGE SECURITIES LLC**

2060 Huntington Drive, Suite 1
 San Marino, CA 91108
 CRD# 159712
 Registered with this firm since: 10/30/2015

CABOT LODGE SECURITIES LLC

200 Vesey Street
 24th Floor
 NEW YORK, NY 10281
 CRD# 159712
 Registered with this firm since: 10/30/2015

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 registered with:**

- 1 Self-Regulatory Organization
- 11 U.S. states and territories

This broker has passed:

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

Registration History**This broker was previously registered with the following securities firm(s):****CONCORDE INVESTMENT SERVICES, LLC**

CRD# 151604
 SAN MARINO, CA
 08/2011 - 11/2015

CAPWEST SECURITIES, INC.

CRD# 30002
 SAN MARINO, CA
 04/2011 - 08/2011

MAM SECURITIES, LLC

CRD# 124620
 SHERMAN OAKS, CA
 08/2010 - 04/2011

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
Customer Dispute	11
Termination	1

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 individual is currently registered with 1 SRO and is licensed in 11 U.S. states and territories through his or her employer.

Employment 1 of 1

Firm Name: **CABOT LODGE SECURITIES LLC**

Main Office Address: **200 VESEY STREET
24TH FLOOR
NEW YORK, NY 10281**

Firm CRD#: **159712**

SRO	Category	Status	Date
FINRA	General Securities Principal	APPROVED	10/30/2015
FINRA	General Securities Representative	APPROVED	10/30/2015
FINRA	Invest. Co and Variable Contracts	APPROVED	10/30/2015

U.S. State/ Territory	Category	Status	Date
California	Agent	APPROVED	11/10/2015
Georgia	Agent	APPROVED	07/27/2016
Illinois	Agent	APPROVED	07/21/2016
Louisiana	Agent	APPROVED	10/30/2015
Michigan	Agent	APPROVED	10/30/2015
New Mexico	Agent	APPROVED	10/30/2015
New York	Agent	APPROVED	10/30/2015
Pennsylvania	Agent	APPROVED	08/15/2017
South Carolina	Agent	APPROVED	11/12/2015
Texas	Agent	APPROVED	12/10/2015
Washington	Agent	APPROVED	07/21/2016

Broker Qualifications



Employment 1 of 1, continued

Branch Office Locations

CABOT LODGE SECURITIES LLC

2060 Huntington Drive, Suite 1
San Marino, CA 91108



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

Principal/Supervisory Exams

Exam	Category	Date
General Securities Principal Examination	Series 24	01/28/1999

General Industry/Product Exams

Exam	Category	Date
General Securities Representative Examination	Series 7	05/11/1993
Futures Managed Funds Examination	Series 31	12/12/2002

State Securities Law Exams

Exam	Category	Date
Uniform Securities Agent State Law Examination	Series 63	05/18/1993
Uniform Investment Adviser Law Examination	Series 65	05/29/1998

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/.



Registration and Employment History

Registration History

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
08/2011 - 11/2015	CONCORDE INVESTMENT SERVICES, LLC	151604	SAN MARINO, CA
04/2011 - 08/2011	CAPWEST SECURITIES, INC.	30002	SAN MARINO, CA
08/2010 - 04/2011	MAM SECURITIES, LLC	124620	SHERMAN OAKS, CA
02/2007 - 10/2010	CAPWEST SECURITIES, INC.	30002	SAN MARINO, CA
02/2005 - 02/2007	UNITED SECURITIES ALLIANCE, INC.	36487	SAN MARINO, CA
02/1999 - 01/2005	NATIONAL PLANNING CORPORATION	29604	EL SEGUNDO, CA
04/1997 - 02/1999	INTERSECURITIES, INC.	16164	ST. PETERSBURG, FL
08/1995 - 04/1997	LAGUNA SECURITIES, INC.	37547	NEWPORT BEACH, CA
03/1994 - 08/1995	WEALTH RESOURCE CAPITAL CORPORATION	10367	NEWPORT BEACH, CA
05/1993 - 03/1994	SECURITIES AMERICA, INC.	10205	LAVISTA, NE

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
10/2015 - Present	CL Wealth Mangement LLC	New York, NY
10/2015 - Present	Cabot Lodge Securities LLC	New York, NY
04/2009 - Present	TWEED MARKETING INSURANCE, LLC	SAN MARINO, CA
07/2006 - Present	TFS REALTY	SAN MARINO, CA
02/1999 - Present	TWEED INSURANCE SERVICES	SAN MARINO, CA
08/1992 - Present	TWEED FINANCIAL SERVICES, INC.	SAN MARINO, CA
09/2013 - 10/2015	CONCORDE ASSET MANAGEMENT LLC	TROY, MI



Registration and Employment History

Employment History, continued

Employment Dates	Employer Name	Employer Location
08/2011 - 10/2015	CONCORDE INVESTMENT SERVICES, LLC	TROY, MI
04/2011 - 08/2011	CAPWEST SECURITIES	LAKEWOOD, CO
08/2010 - 04/2011	MAM SECURITIES, LLC	SHERMAN OAKS, CA
08/2010 - 04/2011	MAM SECURITIES, LLC	SHERMAN OAKS, CA
02/2007 - 09/2010	CAPWEST SECURITIES, INC	LAKEWOOD, CO

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) TWEED FINANCIAL SERVICES, FINANCIAL PLANNING, INVESTMENT ADVISOR, INSURANCE, ANNUITIES, PRESIDENT, 100% OWNERSHIP.
- 2) THE EXETER GROUP. LLC - P.O. BOX 601160, SAN DIEGO, CA 92160 - QUALIFIED INTERMEDIARY - SHAREHOLDER APROX 7% - NOT INV REL - HRS/MTH: 10 TRADE HRS: 0 *1/2008
- 3) ATHENIAN FUND, LLC - 2060 HUNTINGTON DR., STE 1, SAN MARINO, CA - HEDGE FUND - SOLE MANAGING MEMBER - NOT OPERATIONAL - INV REL- HRS/MTH: 4 TRADE HRS: 4 *12/2006
- 4) WATERLOO LLC - PERSONAL INVEST VEHICLE - INV REL HRS/ MTH 2: TRADE HRS 2, SALES, COMM, 04/09;
- 5) MANAGER OF WATERLOO ENERGY, LLC, INVOLVED IN THE DEVELOPMENT OF ENERGY RELATED PROJECTS, PRIMARILY SOLAR PROJECTS FOR BOTH RESIDENTIAL AND COMMERCIAL AS WELL AS OIL AND GAS DRILLING PROJECTS IN THE STATE OF TEXAS. INVESTOR/SHAREHOLDER IN STAR POINT ENERGY LLC 12 HOURS PER MONTH.
- 6) TFS PROPERTIES, INC./TFS REALTY, INC., NON INVESTMENT RELATED, SAN MARINO CA, PRESIDENT/OWNER, REFERRING AND LISTING REAL ESTATE PROPERTIES, 1-5 HOURS/MONTH DURING BUSINESS HOURS.
- 7) STARPOINT ENERGY, LLC. INVESTMENT RELATED, OIL AND GAS DRILLING RELATED ENERGY ACTIVITIES, FORT WORTH TX, UNIT HOLDER, NO TITLED POSITION, NOT ACTIVE IN DAY TO DAY OPERATIONS, HELP CONSULT ON OFFERINGS, TYPES OF PROJECTS TO GET INVOLVED IN AND DUE DILIGENCE. 6-10 HOURS/MONTH DURING BUSINESS HOURS.
- 8) TWEED MARKETING SERVICES, LLC. INVESTMENT RELATED, SAN MARINO CA, OWNER, MARKETING AND

Registration and Employment History



Other Business Activities, continued

SALES OF INSURANCE PRODUCTS. 1-5 HOURS/MONTH DURING BUSINESS HOURS.

9) MOLD ZERO, LLC, OWNER, 7/2015, MOLD REDUCTION IN HOMES AND COMMERCIAL BUILDINGS, 6 HOURS PER MONTH, 1 HOUR DURING TRADING HOURS, NOT INVESTMENT RELATED.



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.
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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	1	0	0



Customer Dispute	2	9	N/A
Termination	N/A	1	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 - Pending

This type of disclosure event involves a pending formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory agency such as the Securities and Exchange Commission, foreign financial regulatory body) for alleged violations of investment-related rules or regulations.

Disclosure 1 of 1

Reporting Source:	Regulator
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	Other: n/a
Date Initiated:	04/27/2017
Docket/Case Number:	2015046631101
Employing firm when activity occurred which led to the regulatory action:	Cap West Securities Inc.
Product Type:	Other: pooled investment fund
Allegations:	Tweed was named a respondent in a FINRA complaint alleging that he obtained more than \$1.6 million from his retail customers through a false and misleading private placement memorandum (PPM) he used to offer and sell interests in a pooled investment fund that he both created and controlled and as a result of the conduct alleged herein. Tweed violated FINRA Rule 2010, both independently and by virtue of contravening Sections 17(a)(2) and 17(a)(3) of the Securities Act of 1933. The complaint alleges that Tweed drafted and circulated the PPM, which misrepresented and failed to disclose material information to investors, and twenty-three customers invested in the fund without the benefit of complete and accurate information, (misleading statements and misleading omissions), about the total potential fees and costs associated with the fund, Tweed himself, and the entities



and individual who would ultimately have immediate control over the money that customers invested. Tweed and the PPM misrepresented or failed to disclose material facts to retail customers, including, among others, that Tweed had replaced the fund's identified master fund with another entity controlled by an undisclosed person, who would now have immediate control over the fund's assets. As a result of these material misrepresentations and omissions, the fund investors could not evaluate the true costs and risks associated with the fund, including those relating to the individual or the entities with immediate control over their capital. Because Tweed used misleading information to solicit investors in the fund, those investors were prevented from vetting the undisclosed person, who was engaging in bank fraud and fraudulent trading in another unrelated pooled investment program at the same time that Tweed was entrusting him with the fund's assets. In fact, just over two months after the fund offering ended, the undisclosed person abandoned the computerized quantitative trading strategy described in the PPM, exercising his undisclosed control over the fund's assets to transfer \$650,000 to a third party financier, purportedly to support the importation, refining, and sale of Ghanaian gold dust in the United States. The profit promised from this investment never materialized, the \$650,000 has not been repaid, and it may never be recovered by the fund's investors.

Current Status: Pending

Reporting Source: Broker

Regulatory Action Initiated By: FINRA

Sanction(s) Sought: Other: n/a

Date Initiated: 04/27/2017

Docket/Case Number: [2015046631101](#)

Employing firm when activity occurred which led to the regulatory action: Cap West Securities Inc.

Product Type: Other: pooled investment fund

Allegations: Tweed was named a respondent in a FINRA complaint alleging that he obtained more than \$1.6 million from his retail customers through a false and misleading private placement memorandum (PPM) he used to offer and sell interests in a pooled investment fund that he both created and controlled and as a result of the conduct alleged herein. Tweed violated FINRA Rule 2010, both independently and by virtue of contravening Sections 17(a)(2) and 17(a)(3) of the Securities Act of



1933. The complaint alleges that Tweed drafted and circulated the PPM, which misrepresented and failed to disclose material information to investors, and twenty-three customers invested in the fund without the benefit of complete and accurate information, (misleading statements and misleading omissions), about the total potential fees and costs associated with the fund, Tweed himself, and the entities and individual who would ultimately have immediate control over the money that customers invested. Tweed and the PPM misrepresented or failed to disclose material facts to retail customers, including, among others, that Tweed had replaced the fund's identified master fund with another entity controlled by an undisclosed person, who would now have immediate control over the fund's assets. As a result of these material misrepresentations and omissions, the fund investors could not evaluate the true costs and risks associated with the fund, including those relating to the individual or the entities with immediate control over their capital. Because Tweed used misleading information to solicit investors in the fund, those investors were prevented from vetting the undisclosed person, who was engaging in bank fraud and fraudulent trading in another unrelated pooled investment program at the same time that Tweed was entrusting him with the fund's assets. In fact, just over two months after the fund offering ended, the undisclosed person abandoned the computerized quantitative trading strategy described in the PPM, exercising his undisclosed control over the fund's assets to transfer \$650,000 to a third party financier, purportedly to support the importation, refining, and sale of Ghanaian gold dust in the United States. The profit promised from this investment never materialized, the \$650,000 has not been repaid, and it may never be recovered by the fund's investors.

Current Status:

Pending



Customer Dispute - Award / Judgment

This type of disclosure event involves a final, consumer-initiated, investment-related arbitration or civil suit containing allegations of sales practice violations against the broker that resulted in an arbitration award or civil judgment for the customer.

Disclosure 1 of 1

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	CAPWEST SECURITIES, INC.
Allegations:	ALLEGES FRAUDULENT MISREPRESENTATION, FRAUDULENT CONCEALMENT / OMISSION, NEGLIGENT MISREPRESENTATION, NEGLIGENT CONCEALMENT / OMISSION, NEGLIGENCE, UNSUITABILITY, FAILURE TO SUPERVISE, BREACH OF FIDUCIARY DUTY, BREACH OF IMPLIED COVENANT OF GOOD FAITH AND FAIR DEALING, ELDER ABUSE UNDER CA LAW, VIOLATION OF STATE AND FEDERAL SECURITIES LAWS, VIOLATIONS OF FINRA, NAS AND NYSE RULES
Product Type:	Other: TIC PRIVATE PLACEMENTS
Alleged Damages:	\$1,870,000.00
Alleged Damages Amount Explanation (if amount not exact):	REQUESTS RESCESSION PLUS INTEREST AT THE LEGAL RATE, DAMAGES IN EXCESS OF \$1 MILLION, TREBLE DAMAGES UNDER CA ELDER ABUSE STATUTE, ATTORNEY FEES AND COSTS, PUNITIVE DAMAGES AND OTHER RELIEF AS THE PANEL DEEMS JUST AND PROPER. PER BD RECORDS, CUSTOMERS INVESTMENTS TOTAL \$870,000. THE SOC DOES NOT INDICATE AN INVESTMENT AMOUNT.
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:	06/09/2009
Complaint Pending?	No
Status:	Evolved into Arbitration/CFTC reparation (the individual is a named party)
Status Date:	05/26/2011
Settlement Amount:	

**Individual Contribution****Amount:****Arbitration Information****Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):** FINRA**Docket/Case #:** [11-01909](#)**Date Notice/Process Served:** 06/03/2011**Arbitration Pending?** No**Disposition:** Award to Customer**Disposition Date:** 05/25/2012**Monetary Compensation Amount:** \$338,000.00**Individual Contribution Amount:** \$112,666.00**Broker Statement**

-In August 2007 [customer] invested in several TICs that were approved by Tweed's Broker-Dealer, CapWest Securities through a 1031 exchange. An arbitration was held in May 2012. The panel awarded [customer] \$338,000 of which Tweed was responsible for 1/3 and the balance was to be paid by CapWest and the due diligence officer, [third party].



Customer Dispute - Settled

This type of disclosure event involves a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit containing allegations of sale practice violations against the broker that resulted in a monetary settlement to the customer.

Disclosure 1 of 4

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	NATIONAL PLANNING CORPORATION
Allegations:	CLAIMANT ALLEGES BREACH OF FIDUCIARY DUTY, MISREPRESENTATIONS AND OMISSIONS, FAILURE TO SUPERVISE, UNFAIR AND DECEPTIVE TRADE PRACTICES, VIOLATION OF STATE AND FEDERAL SECURITIES LAWS, AND ELDER ABUSE
Product Type:	Other: 1031 TIC
Alleged Damages:	\$0.00
Alleged Damages Amount Explanation (if amount not exact):	THE FIRM HAS MADE A GOOD FAITH DETERMINATION THAT THE DAMAGES FROM THE ALLEGED ACTIVITY ARE GREATER THAN \$5,000.00
Is this an oral complaint?	No
Is this a written complaint?	No
Is this an arbitration/CFTC reparation or civil litigation?	Yes
Arbitration/Reparation forum or court name and location:	FINRA
Docket/Case #:	15-03276
Filing date of arbitration/CFTC reparation or civil litigation:	12/07/2015

Customer Complaint Information

Date Complaint Received:	12/22/2015
Complaint Pending?	No
Status:	Settled
Status Date:	11/08/2016



Settlement Amount: \$160,000.00

Individual Contribution Amount: \$0.00

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: NATIONAL PLANNING CORPORATION

Allegations: CLAIMANT ALLEGES BREACH OF FIDUCIARY DUTY, MISREPRESENTATIONS AND OMISSIONS, FAILURE TO SUPERVISE, UNFAIR AND DECEPTIVE TRADE PRACTICES, VIOLATION OF STATE OF STATE AND FEDERAL SECURITIES LAWS, AND ELDER ABUSE

Product Type: Other: 1031 TIC

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): NATIONAL PLANNING A GOOD FAITH DETERMINATION THAT THE DAMAGES FROM ALLEGED ACTIVITY ARE GREATER THAN \$5,000

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation? Yes

Arbitration/Reparation forum or court name and location: FINRA

Docket/Case #: 15-03276

Filing date of arbitration/CFTC reparation or civil litigation: 12/22/2015

Customer Complaint Information

Date Complaint Received: 12/22/2015

Complaint Pending? No

Status: Settled

Status Date: 11/08/2016



Settlement Amount:	\$160,000.00
Individual Contribution Amount:	\$0.00
Broker Statement	ROBERT TWEED IS NOT NAMED AS A RESPONDENT IN THIS ARBITRATION

Disclosure 2 of 4

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	CAPWEST SECURITIES, INC.
Allegations:	BREACH OF FIDUCIARY DUTY, PROFESSIONAL NEGLIGENCE OF FINANCIAL ADVISOR, NEGLIGENT OMISSIONS CAUSING INJURY, NEGLIGENT MISREPRESENTATION OF MATERIAL FACTS, COMMON COUNT - MONEY HAD AND RECEIVED, RESCISSION OF CONTRACT DUE TO FRAUD OR MISTAKE, TORT OF ANOTHER CLAIM FOR ATTORNEY'S FEES, DECLARATORY RELIEF REGARDING ARBITRATION AGREEMENTS, UNFAIR BUSINESS PRACTICES UNDER CA CODE, FRAUD IN THE SALE OF SECURITIES UNDER CA BLUE SKY LAWS, SALE OF UNREGISTERED SECURITIES UNDER CA BLUE SKY LAWS
Product Type:	Other: TIC PRIVATE PLACEMENTS
Alleged Damages:	\$1,800,000.00
Alleged Damages Amount Explanation (if amount not exact):	REQUESTS AWARD OF ECONOMIC DAMAGES, PLUS INTEREST, WITH GENERAL, SPECIAL, COMPENSATORY, INCIDENTAL, CONSEQUENTIAL, ECONOMIC OR TREBLE DAMAGES AS APPLICABLE FOR EACH CAUSE OF ACTION, INJUNCTIVE RELIEF, RESCISSION, AWARD OF ATTORNEY FEES, PUNITIVE AND EXEMPLARY DAMAGES, PREJUDGEMENT INTEREST, COSTS OF SUIT AND OTHER DAMAGES DEEMED PROPER. ESTIMATED INVESTMENT AMOUNT WAS \$1.8 MILLION.

Civil Litigation Information

Type of Court:	State Court
Name of Court:	SUPERIOR COURT FOR THE STATE OF CALIFORNIA FOR THE COUNTY OF SAN DIEGO
Location of Court:	SAN DIEGO CA
Docket/Case #:	37-2011-00091226-CU-FR-CTL
Date Notice/Process Served:	06/28/2011



Litigation Pending?	No
Disposition:	Settled
Disposition Date:	05/04/2015
Monetary Compensation Amount:	\$17,500.00
Individual Contribution Amount:	\$17,500.00
Broker Statement	Ronay had invested in several TIC property investments that had been approved by Tweed's Broker Dealer thru a 1031 exchange in early 2008 before the RE bubble collapse. - Mediation 5-4-15 Claimant agreed to settle for \$17,500 rather than go to arbitration.

Disclosure 3 of 4

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	UNITED SECURITIES ALLIANCE
Allegations:	UNSUITABLE INVESTMENTS, BREACH OF CONTRACT, FRAUD, BREACH OF FIDUCIARY DUTY, NEGLIGENT FOR THE SALES OF WATERSONG APARTMENTS AND CABOT TURFWAY RIDGE ACQUISITION IN FEBRUARY 2007. CLAIMANTS ARE NOT CLIENTS OF CAPWEST SECURITIES
Product Type:	Other: PRIVATE PLACEMENTS
Alleged Damages:	\$700,000.00
Alleged Damages Amount Explanation (if amount not exact):	AMOUNT IS NOT SPECIFIED, ALTHOUGH ARBITRATION STATES 'ALMOST \$700,000NOF CLAIMANTS MONEY...'

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	10-02633
Date Notice/Process Served:	07/06/2010
Arbitration Pending?	No



Disposition:	Settled
Disposition Date:	07/16/2012
Monetary Compensation Amount:	\$156,250.00
Individual Contribution Amount:	\$52,083.00
Broker Statement	-In January 2007 the [customer's] invested in several TIC properties in a 1031 exchange that were approved by Tweed's Broker-Dealer, CapWest Securities. An arbitration was held in July 2012. The [customer's] were awarded \$156,250 and Tweed was responsible for 1/3 of the award \$52,083.

Disclosure 4 of 4

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	NATIONAL PLANNING CORPORATION
Allegations:	CLIENT CLAIMS THAT HE DID NOT RECEIVE THE VARIABLE ANNUITY POLICY AND SUBSEQUENTLY WANTED TO RESCIND THE CONTRACT WITHIN THE FREE LOOK PERIOD
Product Type:	Annuity(ies) - Variable
Alleged Damages:	\$10,172.33
Customer Complaint Information	
Date Complaint Received:	07/18/2003
Complaint Pending?	No
Status:	Settled
Status Date:	08/25/2003
Settlement Amount:	\$10,172.33
Individual Contribution Amount:	\$500.00
Firm Statement	TRANSAMERICA AGREED TO PERMIT THE CLIENT TO FREE-LOOK THE POLICY UNDER THE TERMS OF THE INVESTMENT CONTRACT AND REIMBURSED THE CLIENT'S SURRENDER CHARGE IN THE AMOUNT OF \$9,672.33. THE REPRESENTATIVE PAID \$500.00 IN ATTORNEY'S FEES AS



PART OF THE SETTLEMENT.

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	NATIONAL PLANNING CORPORATION
Allegations:	CLIENT CLAIMS THAT HE DID NOT RECEIVE THE VARIABLE ANNUITY POLICY AND SUBSEQUENTLY WANTED TO RESCIND THE CONTRACT WITHIN THE FREE LOOK PERIOD
Product Type:	Annuity(ies) - Variable
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Customer Dispute - Closed-No Action / Withdrawn / Dismissed / Denied

This type of disclosure event involves (1) a consumer-initiated, investment-related arbitration or civil suit containing allegations of sales practice violations against the individual broker that was dismissed, withdrawn, or denied; or (2) a 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, which was closed without action, withdrawn, or denied.

Disclosure 1 of 4

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	NATIONAL PLANNING CORPORATION & UNITED SECURITIES ALLIANCE, INC.
Allegations:	CLAIMANT ALLEGES VIOLATION OF STANDARDS OF REASONABLE BASIS SUITABILITY AND JUST AND EQUITABLE PRINCIPLES OF TRADE, FRAUD, MISLEADING STATEMENTS, MISLEADING OMISSIONS OF MATERIAL INFORMATION, BREACH OF FIDUCIARY DUTY, NEGLIGENT MISREPRESENTATION, NEGLIGENCE, BREACH OF CONTRACT, AND BREACH OF COVENANT OF GOOD FAITH AND FAIR DEALING
Product Type:	Other: 1031 TIC
Alleged Damages:	\$0.00
Alleged Damages Amount Explanation (if amount not exact):	THE FIRM HAS MADE A GOOD FAITH DETERMINATION THAT THE DAMAGES FROM THE ALLEGED ACTIVITY ARE GREATER THAN \$5,000.00
Is this an oral complaint?	No
Is this a written complaint?	No
Is this an arbitration/CFTC reparation or civil litigation?	Yes
Arbitration/Reparation forum or court name and location:	FINRA
Docket/Case #:	16-00746
Filing date of arbitration/CFTC reparation or civil litigation:	03/14/2016

Customer Complaint Information

Date Complaint Received: 04/04/2016



Complaint Pending? No

Status: Arbitration Award/Monetary Judgment (for respondents/defendants)

Status Date: 08/28/2017

Settlement Amount:

Individual Contribution Amount:

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: NATIONAL PLANNING CORPORATION & UNITED SECURITIES ALLIANCE, INC.

Allegations: CLAIMANT ALLEGES VIOLATION OF STANDARDS OF REASONABLE BASIS SUITABILITY AND JUST AND EQUITABLE PRINCIPLES OF TRADE, FRAUD, MISLEADING STATEMENTS, MISLEADING OMISSIONS OF MATERIAL INFORMATION, BREACH OF FIDUCIARY DUTY, NEGLIGENT MISREPRESENTATION, NEGLIGENCE, BREACH OF CONTRACT, AND BREACH OF COVENANT OF GOOD FAITH AND FAIR DEALING

Product Type: Other: 1031 TIC

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): THE FIRM HAS MADE A GOOD FAITH DETERMINATION THAT THE DAMAGES FROM THE ALLEGED ACTIVITY ARE GREATER THAN \$5,000.00

Is this an oral complaint? No

Is this a written complaint? No

Is this an arbitration/CFTC reparation or civil litigation? Yes

Arbitration/Reparation forum or court name and location: FINRA

Docket/Case #: 16-00746

Filing date of arbitration/CFTC reparation or civil litigation: 03/14/2016

Customer Complaint Information



Date Complaint Received: 04/04/2016

Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:

Broker Statement MR. TWEED IS ALREADY A PARTY TO AN ARBITRATION WITH THE CLAIMANT. NATIONAL PLANNING WAS NOT PART OF THE PREVIOUSLY FILED ARBITRATION.

Disclosure 2 of 4

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: UNITED SECURITIES ALLIANCE

Allegations: MISREPRESENTATION, BREACH OF FIDUCIARY DUTY, BREACH OF DISCLOSURE, NEGLIGENCE, IN RELATION TO TENANT IN COMMON INTEREST SOLD IN 2007.

Product Type: Other: TENANT IN COMMON INTEREST

Alleged Damages: \$334,000.00

Alleged Damages Amount Explanation (if amount not exact): CLASS ACTION SUIT. THIS PORTION REPRESENTS INVESTMENT SOLD BY ROBERT TWEED.

Arbitration Information

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

Docket/Case #: 14-02936

Date Notice/Process Served: 11/03/2014

Arbitration Pending? Yes

Civil Litigation Information

Type of Court: State Court

Name of Court: LOS ANGELES COUNTY SUPERIOR COURT



Location of Court: LOS ANGELES, CA
Docket/Case #: BC534926
Date Notice/Process Served: 02/21/2014
Litigation Pending? No
Disposition: Other: EVOLVED INTO FINRA ARBITRATION
Disposition Date: 11/03/2014
Broker Statement [customer's] parents did a 1031 exchange into several TIC properties in August 2005, all approved by United Securities Alliance, Tweed's Broker-Dealer. This claim is years past the statute of limitations and is pending arbitration.

Disclosure 3 of 4

Reporting Source: Broker
Employing firm when activities occurred which led to the complaint: CAPWEST SECURITIES, INC.
Allegations: CLIENT ALLEGES THAT REPRESENTATIVE DID NOT PERFORM DUE DILIGENCE WHEN MAKING RECOMMENDATION REGARDING CANYON CREEK THE WATERFORD AND PENNBRIDGE HOTEL INDIGO. CLIENT PURCHASES WERE ON 04/24/2007.
Product Type: Other: TIC PRIVATE PLACEMENT
Alleged Damages: \$200,000.00
Alleged Damages Amount Explanation (if amount not exact): CLIENT MENTIONS INVESTMENT AMOUNT BUT DOES NOT SPECIFY DAMAGES
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: 09/09/2009
Complaint Pending? No
Status: Closed/No Action



Status Date: 05/19/2011

Settlement Amount:

Individual Contribution Amount:

Disclosure 4 of 4

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: NATIONAL PLANNING CORPORATION

Allegations: [CUSTOMER] WAS UPSET HIS ACCOUNT DROPPED \$22,000.00 IN VALUE OVER THE LAST TWO MONTHS.

Product Type: Mutual Fund(s)

Alleged Damages: \$22,700.00

Customer Complaint Information

Date Complaint Received: 04/17/2002

Complaint Pending? No

Status: Closed/No Action

Status Date: 02/03/2005

Settlement Amount:

Individual Contribution Amount:

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: NATIONAL PLANNING CORP.

Allegations: [CUSTOMER] WAS UPSET HIS ACCOUNT DROPPED \$22,000 IN VALUE OVER THE LAST TWO MONTHS

Product Type: Mutual Fund(s)

Alleged Damages: \$22,700.00

Customer Complaint Information



Date Complaint Received: 04/17/2002
Complaint Pending? No
Status: Closed/No Action
Status Date: 02/03/2005
Settlement Amount:
Individual Contribution Amount:



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 2

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Concorde Investment Services, LLC
Allegations:	Client is alleging misrepresentation and poor performance in relation to investments made in July of 2013.
Product Type:	Direct Investment-DPP & LP Interests
Alleged Damages:	\$145,000.00
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:	01/03/2017
Complaint Pending?	Yes

Settlement Amount:

Individual Contribution Amount:

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	Concorde Investment Services, LLC
Allegations:	Client is alleging misrepresentation and poor performance in relation to investments made in July of 2013.
Product Type:	Direct Investment-DPP & LP Interests
Alleged Damages:	\$145,000.00



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: 02/01/2017
 Complaint Pending? Yes
 Settlement Amount:
 Individual Contribution
 Amount:

Disclosure 2 of 2

Reporting Source: Broker
 Employing firm when
 activities occurred which led
 to the complaint: CAPWEST SECURITIES, INC. AND CONCORDE INVESTMENT SERVICES, LLC
 Allegations: CLIENT IS ALLEGING UNAUTHORIZED TRADING, MISREPRESENTATION AND
 MISAPPROPRIATION OF FUNDS IN RELATION TO VARIOUS LIMITED
 PARTNERSHIP INVESTMENTS OCCURRING BETWEEN 2010 AND 2013.
 Product Type: Direct Investment-DPP & LP Interests
 Alleged Damages: \$0.00
 Alleged Damages Amount
 Explanation (if amount not
 exact): DAMAGES UNSPECIFIED BUT BELIEVED TO 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: 07/30/2015
 Complaint Pending? Yes



Settlement Amount:

Individual Contribution Amount:

Broker Statement

[customer] claims are unfounded and made despite multiple documents [customer] had signed authorizing the investments.



Employment Separation After Allegations

This type of disclosure event involves a situation where the broker voluntarily resigned, was discharged, or was permitted to resign after being accused of (1) violating investment-related statutes, regulations, rules or industry standards of conduct; (2) fraud or the wrongful taking of property; or (3) failure to supervise in connection with investment-related statutes, regulations, rules, or industry standards of conduct.

Disclosure 1 of 1

Reporting Source: Firm
Employer Name: NATIONAL PLANNING CORPORATION
Termination Type: Discharged
Termination Date: 01/19/2005
Allegations: VIOLATIONS OF NASD CONDUCT RULE 2210.
Product Type: No Product
Other Product Types:

Reporting Source: Broker
Employer Name: NATIONAL PLANNING CORPORATION
Termination Type: Discharged
Termination Date: 01/19/2005
Allegations: VIOLATIONS OF NASD CONDUCT RULE 2210.
Product Type: No Product

Broker Statement A Real Estate Agent took Tweed's flyer for an approved seminar and cut and pasted it into an ad in a local weekly newspaper without Tweed's knowledge or National Plannings approval. This led to Tweed being accused of the 2210 violation, due to Tweed's lack of control over the Real Estate Agent.

End of Report



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