

BrokerCheck Report

MARK WILLIAM JUST

CRD# 1138738

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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:

- o 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
- o 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.



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)

Thank you for using FINRA BrokerCheck.

**MARK W. JUST**

CRD# 1138738

Currently employed by and registered with the following Firm(s):

IA THE JUST COMPANY
 5635 CASTLE CREEK PARKWAY NORTH
 DRIVE
 INDIANAPOLIS, IN 46250
 CRD# 119088
 Registered with this firm since: 12/30/1991

B TRIAD ADVISORS LLC
 5635 CASTLE CREEK PARKWAY NORTH
 DRIVE
 INDIANAPOLIS, IN 46250
 CRD# 25803
 Registered with this firm since: 01/26/2004

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
- 24 U.S. states and territories

This broker has passed:

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

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

- B ROYAL ALLIANCE ASSOCIATES, INC.**
 CRD# 23131
 JERSEY CITY, NJ
 11/1995 - 01/2004
- B DELTA EQUITY SERVICES CORPORATION**
 CRD# 15650
 BOLTON, MA
 05/1995 - 11/1995
- B FOUNDATION INVESTORS SECURITIES CORP.**
 CRD# 35541
 08/1994 - 05/1995

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	8



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 24 U.S. states and territories through his or her employer.

Employment 1 of 2

Firm Name: **THE JUST COMPANY**
 Main Office Address: **5635 CASTLE CREEK PARKWAY NORTH DRIVE
 INDIANAPOLIS, IN 46250**
 Firm CRD#: **119088**

U.S. State/ Territory	Category	Status	Date
IA California	Investment Adviser Representative	APPROVED	10/05/2012
IA Florida	Investment Adviser Representative	APPROVED	06/27/2012
IA Indiana	Investment Adviser Representative	APPROVED	12/30/1991
IA Maine	Investment Adviser Representative	APPROVED	05/24/2012
IA Texas	Investment Adviser Representative	APPROVED	05/25/2012

Branch Office Locations

This individual does not have any registered Branch Office where the individual is located.

Employment 2 of 2

Firm Name: **TRIAD ADVISORS LLC**
 Main Office Address: **5155 PEACHTREE PARKWAY
 SUITE 3220
 NORCROSS, GA 30092**
 Firm CRD#: **25803**

SRO	Category	Status	Date
B FINRA	Direct Participation Programs	APPROVED	01/26/2004



Broker Qualifications

Employment 2 of 2, continued

SRO	Category	Status	Date
B FINRA	General Securities Principal	APPROVED	01/26/2004
B FINRA	General Securities Representative	APPROVED	01/26/2004
B FINRA	Invest. Co and Variable Contracts	APPROVED	01/26/2004
B FINRA	Operations Professional	APPROVED	12/08/2011

U.S. State/ Territory	Category	Status	Date
B Arizona	Agent	APPROVED	09/09/2013
B California	Agent	APPROVED	01/26/2004
B Colorado	Agent	APPROVED	07/05/2016
B Florida	Agent	APPROVED	01/26/2004
B Georgia	Agent	APPROVED	11/03/2014
B Illinois	Agent	APPROVED	01/26/2004
B Indiana	Agent	APPROVED	01/26/2004
B Iowa	Agent	APPROVED	01/30/2020
B Kentucky	Agent	APPROVED	06/05/2014
B Louisiana	Agent	APPROVED	11/14/2011
B Maine	Agent	APPROVED	10/25/2007
B Michigan	Agent	APPROVED	09/18/2008
B Minnesota	Agent	APPROVED	03/23/2010
B Missouri	Agent	APPROVED	04/11/2011
B New Jersey	Agent	APPROVED	07/19/2006
B New Mexico	Agent	APPROVED	06/03/2020



Broker Qualifications

Employment 2 of 2, continued

U.S. State/ Territory	Category	Status	Date
B North Carolina	Agent	APPROVED	11/09/2012
B Ohio	Agent	APPROVED	02/02/2004
B Rhode Island	Agent	APPROVED	11/09/2012
B South Carolina	Agent	APPROVED	03/29/2019
B Texas	Agent	APPROVED	07/23/2009
B Utah	Agent	APPROVED	03/14/2013
B Virginia	Agent	APPROVED	11/13/2012
B Washington	Agent	APPROVED	02/10/2014

Branch Office Locations

TRIAD ADVISORS LLC
 5635 CASTLE CREEK PARKWAY NORTH DRIVE
 INDIANAPOLIS, IN 46250



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, 4 general industry/product exams, and 1 state securities law exam.

Principal/Supervisory Exams

Exam	Category	Date
B General Securities Principal Examination	Series 24	04/29/1988

General Industry/Product Exams

Exam	Category	Date
B Securities Industry Essentials Examination	SIE	10/01/2018
B General Securities Representative Examination	Series 7	02/20/1988
B Direct Participation Programs Representative Examination	Series 22	11/23/1983
B Investment Company Products/Variable Contracts Representative Examination	Series 6	07/08/1983

State Securities Law Exams

Exam	Category	Date
B Uniform Securities Agent State Law Examination	Series 63	07/08/1983

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/.



Broker Qualifications

Professional Designations

This section details that the representative has reported **1** professional designation(s).

Certified Financial Planner

This representative holds or did hold **1** professional designation(s) that may have been used to qualify as an Investment Advisor representative. Please check with the appropriate designation authority for verification that the designation is still in effect. The contact information for these professional designation authorities can be found on the website for the North American Securities Administrators Association at <http://www.nasaa.org>



Registration and Employment History

Registration History

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
B 11/1995 - 01/2004	ROYAL ALLIANCE ASSOCIATES, INC.	23131	JERSEY CITY, NJ
B 05/1995 - 11/1995	DELTA EQUITY SERVICES CORPORATION	15650	BOLTON, MA
B 08/1994 - 05/1995	FOUNDATION INVESTORS SECURITIES CORP.	35541	
B 08/1986 - 09/1994	LINSCO/PRIVATE LEDGER CORP.	6413	FORT MILL, SC
B 09/1983 - 09/1986	MANEQUITY, INC.	5249	

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	Employer Name	Position	Investment Related	Employer Location
01/2004 - Present	TRIAD ADVISORS, INC.	OSJ	Y	NORCROSS, GA, United States
02/1998 - Present	THE JUST COMPANY	PRESIDENT	Y	INDIANAPOLIS, IN, United States
01/1985 - Present	M.W. JUST & ASSOCIATES, INC	OTHER - PRESIDENT FINANCIAL PLANNING	N	CARMEL, IN, United States
06/1982 - Present	MARK W. JUST	PRESIDENT - PRESIDENT	N	INDIANAPOLIS, IN, United States

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. TJC REAL ESTATE; NOT INVESTMENT RELATED; 5635 CASTLE CREEK PARKWAY N. DRIVE INDIANAPOLIS, IN 46250; REAL ESTATE OWNER; OWNER (51%); 2008; 1HR/MO;0HR/TRADE DAY; NO COMPENSATION; OWNER



Registration and Employment History

Other Business Activities, continued

2. APPOINTMENTS WITH MULTIPLE CARRIERS; INVESTMENT RELATED; 5635 CASTLE CREEK PARKWAY N DRIVE, INDIANAPOLIS, IN 46250; LIFE INSURANCE; AGENT; 1982; 4 HRS/MO; 0HRS/TRADE DAY; COMPENSATION- COMMISSION; RECOMMEND AND HELP CLIENTS SELECT PRODUCTS PASED ON THEIR NEEDS AND STATED OBJECTIVES.

3. THE JUST COMPANY; INVESTMENT RELATED; 5635 CASTLE CREEK PARKWAY N DRIVE, INDIANAPOLIS, IN, 46250; REGISTERED INVESTMENT ADVISOR; PRESIDENT, OWNER (100%); 1984;; 80HRS/MO; 4HRS/TRADE DAY; COMPENSATION % OF ASSETS UNDER MANAGEMENT; DEVELOP AND IMPLEMENT COMPANIES STRATEGIC AND MARKETING PLANS, MANAGE INVESTMENTS FOR RIA CLIENTS, MEET WITH PROSPECTIVE AND CURRENT CLIENTS

4. JUST NATIONAL CORP; NOT INVESTMENT RELATED; 5635 CASTLE CREEK PARKWAY N. DRIVE, INDIANAPOLIS, IN 46250; MARKETING COMPANY; OWNER; 2008; 1HR/MONTH; NOT CURRENTLY COMPENSATED; OWNER

5)Advisors Point;not investment related;2441 High Timbers Dr,#410,Woodlands,TX 77380;fixed annuities & life insurance;agent;1/27/2021;12 hrs/month;1-2 hrs during trading;financial planning presentations via webinar/zoom meetings

6)Your Family Bank;not investment related;100 East Town Place,Suite 101,St Augustine,FL 32092;debt reduction/elimination plan;representative;1/25/2021;8 hrs/month;1-2 hrs during trading;educate people on how to get out of debt sooner



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:**
 - o A law enforcement agency must file formal charges before a broker is required to disclose a particular criminal event.
 - o 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.
 - o
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - o 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.
 - o
4. **There are different statuses and dispositions for disclosure events:**
 - o 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.
 - o 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	5	3	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 involve (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:	
Date Initiated:	05/18/2021
Docket/Case Number:	2019064242701
Employing firm when activity occurred which led to the regulatory action:	Triad Advisors LLC
Product Type:	No Product
Allegations:	Without admitting or denying the findings, Just consented to the sanctions and to the entry of findings that he willfully failed to timely amend his Form U4 to disclose state tax liens. The findings stated that Just knew of the tax liens more than 30 days prior to the time he disclosed them on his Form U4.
Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?

No

Resolution Date:

05/18/2021

Sanctions Ordered:

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

Suspension

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

If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?

No

(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?



(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or

(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Sanction 1 of 1

Sanction Type:	Suspension
Capacities Affected:	All capacities
Duration:	three months
Start Date:	06/21/2021
End Date:	09/20/2021



Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$5,000.00

Portion Levied against individual: \$5,000.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:



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 3

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	TRIAD ADVISORS
Allegations:	CLIENT ALLEGES THE RECAPTURE CHARGE ASSOCIATED WITH THE BONUS FEATURE OF FOUR ANNUITIES HE PURCHASED WERE NOT DISCLOSED TO HIM PRIOR TO PURCHASE. THE PURCHASES WERE MADE ON 7/22/09, 7/23/09, 7/24/09 AND 7/20/10.
Product Type:	Annuity-Variable
Alleged Damages:	\$9,000.00
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:	09/06/2013
Complaint Pending?	No
Status:	Denied
Status Date:	09/17/2013
Settlement Amount:	
Individual Contribution Amount:	

Broker Statement	IN ADDITION TO RECEIVING A VERBAL EXPLANATION OF THE RECAPTURE CHARGE, [CUSTOMER] RECEIVED AT LEAST 12 DOCUMENTS (3 ITEMS PER CONTACT) THAT SHOWED THE RECAPTURE CHARGES (PROSPECTUS, SUMMARY PAGE, AND CONTRACT). [CUSTOMER] SIGNED HIS NAME A MINIMUM OF 12 TIMES INDICATING HIS ACKNOWLEDGEMENT OF THESE CHARGES.
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Disclosure 2 of 3

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	TRIAD ADVISORS, INC
Allegations:	MISREPRESENTATION OF VA
Product Type:	Annuity-Variable
Alleged Damages:	\$0.00
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:	12/21/2010
Complaint Pending?	No
Status:	Denied
Status Date:	02/24/2011
Settlement Amount:	\$0.00
Individual Contribution Amount:	\$0.00

Broker Statement

THE CLIENT WROTE A LETTER INDICATING HER DESIRE TO SURRENDER AN ANNUITY PRIOR TO THE END OF THE SURRENDER CHARGE PERIOD AND REQUESTED THAT I REIMBURSE HER THE SURRENDER CHARGE. THE LETTER WAS RECEIVED ABOUT 2 YEARS AFTER THE RECOMMENDATION WAS MADE AND WITH ONLY 2 YEARS REMAINING IN THE SURRENDER CHARGE PERIOD. A WRITTEN RESPONSE WAS PROVIDED TO THE CLIENT IN FEBRUARY 2011 RE-EXPLAINING THE PRODUCT FEATURES AND HOW SHE BENEFITS AND, THEREFORE, WHY THE RECOMMENDATION WAS SUITABLE AT THE TIME THE RECOMMENDATION WAS MADE.

THE ACCOUNT IN QUESTION WAS A STRETCH IRA AND THE ACCOUNT WAS SET UP TO GUARANTEE HER WITHDRAWALS EQUAL TO THE GREATER OF 5% OF HER INITIAL INVESTMENT OR HER RMD FOR BOTH HER AND HER



HUSBAND'S LIFE WITH UPSIDE POTENTIAL. THE PRIMARY BENEFIT WAS THE GUARANTEED WITHDRAWALS FOR LIFE - EVEN IF THE ACCOUNT BALANCE REACHED ZERO. A SECONDARY BENEFIT WAS THE STEP-UPS IN THE INCOME BASE AS A RESULT OF EITHER NO WITHDRAWALS OR AN INCREASE IN THE ACCOUNT VALUE. THERE WAS FULL DISCLOSURE AND AMPLE OPPORTUNITIES FOR THE CLIENT TO CHANGE HER MIND AND/OR CANCEL THE CONTRACT WITHOUT INCURRING ANY PENALTIES. THE CLIENT SIGNED NUMEROUS FORMS ACKNOWLEDGING AND ACCEPTING THE CHARGES ASSOCIATED WITH THE ANNUITY, INCLUDING A 4 YEAR SURRENDER CHARGE PERIOD.

IN JANUARY 2009 AT THE TIME THE ACCOUNT WAS OPENED (AND AGAIN IN HER COMPLAINT LETTER IN DECEMBER 2010), THE CLIENT WAS CONCERNED HER STRETCH IRA WOULD NOT BE ABLE TO "KEEP UP" AND MAINTAIN HER REQUIRED MINIMUM DISTRIBUTIONS, WHICH ARE ABOUT 4% PER YEAR. IN RESPONSE TO THIS CONCERN, SHE INVESTED IN A VARIABLE ANNUITY THAT ALLOWED HER TO INVEST HER FUNDS AS SHE WANTED IN OVER 90 DIFFERENT SUBACCOUNTS WHILE BEING GUARANTEED LIFETIME ANNUAL WITHDRAWALS FOR BOTH HER AND HER HUSBAND EQUAL TO THE GREATER OF 5% OF HER INITIAL INVESTMENT OR HER RMD. THE RIDER COST WAS AND IS 1.25%. THE ANNUITY PROVIDES A 7% INCREASE IN THE INCOME BASE IF THERE ARE NO WITHDRAWALS BUT ALSO PROVIDES STEP-UPS IF THE VALUE INCREASES. IN HER LETTER, THE CLIENT CLAIMED SHE WOULD NOT BE RECEIVING A 7% INCREASE DUE TO THE RMD AND THEREFORE FELT ENTITLED TO A REFUND OF ANY REMAINING SURRENDER CHARGES. IN 2009, THERE WAS NO RMD, MEANING SHE RECEIVED A 7% INCREASE. IN 2010, 90 OF 99 SUBACCOUNTS AVAILABLE IN THIS PRODUCT PROVIDED SUFFICIENT RETURNS TO PAY THE RMD AND STILL PROVIDE A STEP-UP. BASED ON THE AVAILABLE INVESTMENT OPTIONS AND PERFORMANCE, THERE WAS NO NEED TO MOVE THE INVESTMENTS - IN 2010, 90 OUT OF 99 SUBACCOUNTS EARNED 5.25% OR BETTER (ENOUGH TO PAY THE RIDER COSTS AND THE RMD); 69 OUT OF 99 SUBACCOUNTS EARNED 10% OR BETTER; AND 48 SUBACCOUNTS EARNED A HIGHER RETURN THAN THE S&P 500 STOCK INDEX RETURN OF 12.78%, MEANING THERE WAS AMPLE OPPORTUNITIES TO GET A STEP-UP.

THIS RECOMMENDATION WAS SUITABLE AND THE COMPLAINT HAD ABSOLUTELY NO FOUNDATION. IT WAS PERHAPS AN ATTEMPT BY THE CLIENT (AND POSSIBLY A NEW ADVISOR) TO MOVE MONEY INTO ANOTHER PRODUCT WITHOUT INCURRING SURRENDER CHARGES. AFTER SENDING A RESPONSE LETTER IN FEBRUARY 2011 RE-EXPLAINING THE PRODUCT FEATURES AND BENEFITS TO HER, I HAVE NOT RECEIVED ANY ADDITIONAL CORRESPONDENCE FROM THE CLIENT SO I CAN ONLY ASSUME THE LETTER MADE HER REALIZE THIS PRODUCT SATISFIED HER



ANNUAL RMD REQUIRED FOR THE REMAINDER OF HER AND HER HUSBAND'S LIFE AND ALSO PROVIDED UPSIDE POTENTIAL.

Disclosure 3 of 3

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	ROYAL ALLIANCE ASSOCIATES, INC. (BROKER/DEALER)
Allegations:	CUSTOMER CLAIMED HE WAS NOT MADE AWARE OF SURRENDER CHARGES INCURRED BY CHANGING INVESTMENTS. (DATE OF COMPLAINT LETTER - 11-28-97).
Product Type:	Annuity(ies) - Variable
Alleged Damages:	\$8,010.89

Customer Complaint Information

Date Complaint Received:	11/28/1997
Complaint Pending?	No
Status:	Denied
Status Date:	02/06/1998

Settlement Amount:

Individual Contribution Amount:

Broker Statement

COMPLAINT WAS DENIED. ROYAL ALLIANCE AGREED WITH REPRESENTATIVE. BROKER/DEALER INVESTIGATED AND DENIED. NO WRONG DOING WAS FOUND.
SEE LETTER (AND SUPPORTING DOCUMENTS) DATED 1/15/98 FROM MARK JUST CUSTOMER CLAIMED HE DIDN'T KNOW THERE WOULD BE SURRENDER CHARGES AND WANTED TO BE REFUNDED SURRENDER CHARGES DESPITE HAVING SIGNED SEVERAL FORM INDICATING CHARGES AND ADMITTING (VIA LETTER DATED 11/28/97) THAT HE SIGNED SAID FORMS.



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 5

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	Triad Advisors
Allegations:	Claimant alleges that the financial professional recommended alternative investments that were unsuitable.
Product Type:	Real Estate Security
Alleged Damages:	\$100,000.00
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 #:	21-00829
Filing date of arbitration/CFTC reparation or civil litigation:	03/29/2021

Customer Complaint Information

Date Complaint Received:	03/29/2021
Complaint Pending?	Yes
Settlement Amount:	
Individual Contribution Amount:	

Disclosure 2 of 5

Reporting Source:	Broker
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Employing firm when activities occurred which led to the complaint:	Triad Advisors LLC
Allegations:	Claimants allege that Mr. Just recommended alternative investments that were unsuitable.
Product Type:	Direct Investment-DPP & LP Interests Other: BDC and Direct Investment
Alleged Damages:	\$250,000.00
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:	21-00399
Docket/Case #:	02/15/2021
Filing date of arbitration/CFTC reparation or civil litigation:	02/15/2021

Customer Complaint Information

Date Complaint Received:	02/16/2021
Complaint Pending?	Yes
Settlement Amount:	
Individual Contribution Amount:	

Disclosure 3 of 5

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	Triad Advisors LLC
Allegations:	Claimant alleges unsuitable alternative investments.
Product Type:	Real Estate Security
Alleged Damages:	\$150,000.00



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 #: 20-02787
Filing date of arbitration/CFTC reparation or civil litigation: 08/25/2020

Customer Complaint Information

Date Complaint Received: 08/26/2020
Complaint Pending? Yes
Settlement Amount:
Individual Contribution Amount:
Broker Statement Note: U4 update filed on 9/24 answering "yes" to the relevant disclosure question. DRP failed to save; hence this further update.

Disclosure 4 of 5

Reporting Source: Broker
Employing firm when activities occurred which led to the complaint: Triad Advisors LLC
Allegations: Claimants now allege that the investments they elected to purchase in 2014/2015 were unsuitable.
Product Type: Annuity-Variable
Real Estate Security
Alleged Damages: \$100,000.00
Alleged Damages Amount Explanation (if amount not exact): Claimants seek unspecified compensatory damages in excess of \$100,000.



Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	20-00225
Date Notice/Process Served:	01/30/2020
Arbitration Pending?	Yes
Broker Statement	The Statement of Claim is rife with misstatements. The claims are meritless and factually inaccurate. As of early February 2020, Claimants have a gross, unrealized portfolio gain of approximately \$100,000. This matter will be rigorously defended.

Disclosure 5 of 5

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	Triad Advisors LLC
Allegations:	Customer alleges that his portfolio under performed between 2011-2017 due to unsuitable investment recommendations and is seeking to recover "lost gains."
Product Type:	Annuity-Variable Debt-Corporate Equity Listed (Common & Preferred Stock) Mutual Fund
Alleged Damages:	\$997,269.00
Alleged Damages Amount Explanation (if amount not exact):	Customer alleges actual losses of \$149,888, but is seeking to also recover \$765,834, which he perceives as "lost opportunity gains," had the portfolio been invested according to a benchmark analysis. As well, he is seeking return of fees and interest thereon.
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:	06/28/2018
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Complaint Pending? No

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

Status Date: 06/10/2019

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

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

Docket/Case #: 19-01532

Date Notice/Process Served: 06/10/2019

Arbitration Pending? Yes

Broker Statement FINRA investigated [REDACTED] complaint, before it evolved to arbitration. FINRA's investigation in Matter ID 20170539151 was closed with no action.

End of Report



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