FINANCIAL INDUSTRY REGULATORY AUTHORITY

OFFICE OF HEARING OFFICERS

Department of Enforcement, Complainant, v. Leonard Allen Goldberg, (CRD No. 223972), Respondent.	DISCIPLINARY PROCEEDING No. 2011026098504 Hearing Officer _____

COMPLAINT

The Department of Enforcement alleges:

SUMMARY

1. During the seven year period from August 2007 through August 2014, while he was registered with FINRA through associations with two different FINRA regulated firms -- J.P. Turner & Company, LLP and Newport Coast Securities Inc. -- registered representative Leonard Goldberg caused over $123,600 in losses to five customers while making over $77,900 for himself and his firms by using discretion without the requisite written authorization in connection with 300 mutual fund and Exchange Trading Fund ("ETF") transactions to his benefit and the customers' detriment. During five years of that time period, from August 2007 through February 2012, he used that discretion to facilitate a scheme, practice and course of business of effecting fraudulent and unsuitable short term switching of Class A mutual funds in the accounts of the five customers. He also falsified, or caused to be falsified, firm documents in furtherance of his scheme, practice and course of business.

2. Goldberg's fraudulent and unsuitable short term mutual fund switching scheme involved replacing one Class A mutual fund position with another one in the accounts of the five customers more than 90 times in a five year period from August 2007 to February 2012. The accounts held those mutual funds for an average of only five to six months before Goldberg switched the funds. The customers trusted Goldberg to trade on their behalf in their accounts, and he did not inform them in advance of the trades.

3. Goldberg's mutual fund switching in the five customers' accounts had no business purpose other than to generate commissions for himself. The customers, currently ranging in ages from 59 to 73 years old, had invested with Goldberg to plan for their retirement and other long terms needs. However, Goldberg's repeated purchases and sales of Class A mutual funds meant that Goldberg's short term trading resulted in repeated fees and charges to his customers. Goldberg's decision to buy and/or sell mutual funds in the accounts of these five customers was not informed by the fund's performance or the suitability of the fund for any particular customer. At times, he sold particular mutual funds in a customer's account only to buy it back again in the same customer's account several months later. He also sold specific mutual funds in one customer's account while buying it in another customer's account during the same time period. Further, Goldberg switched customers from one mutual fund to another in a different fund family when both funds had similar investment focuses.

4. By engaging in a scheme, practice and course of business to defraud the five customers by continuously switching their Class A mutual fund investments on a short term basis in an effort to generate commissions for himself, Goldberg willfully violated Section 10(b) of the Securities Exchange Act of 1934, Rule 10b-5(a) and (c) promulgated thereunder, and acted in contravention of Section 17(a)(1) of the Securities Act of 1933 thereby violating FINRA Rules

2020 and 2010, along with violating NASD Rules 2120 and 2110. In the alternative, if Goldberg employed his scheme, practice and course of business negligently, then Goldberg acted in contravention of Section 17(a)(3) of the Securities Act of 1933 thereby violating FINRA 2010 and NASD Rule 2110.

5. By virtue of the unsuitability of the short-term mutual fund switch transactions, Goldberg violated NASD Rules 2310 and 2110, IM-2310-2, and FINRA Rules 2111 and 2010.

6. When Goldberg exercised discretion in the accounts of the five customers from August 2007 through August 2014 in connection with 300 purchases and sales of mutual funds and ETFs, he acted without the required written authorization from the customers and the firms. He used discretion, in part, to engage in the fraudulent and unsuitable mutual fund switching scheme, practice and course of business described above. In exercising discretion in his customers' accounts without written authorization from his customers, or approval from his firms, Goldberg violated NASD Rules 2510 and 2110 and FINRA Rule 2010.

7. From August 2007 to November 2014, Goldberg regularly created or caused to be created false and inaccurate firm records. During that time, Goldberg submitted to his FINRA regulated firms approximately 238 electronic orders and 20 mutual fund switch forms in which he falsely identified the vast majority of these transactions as "unsolicited." Since Goldberg used his discretion in all of the mutual fund transactions in the accounts of the five customers, all of those transactions were "solicited," and Goldberg intentionally created false records when he caused the documents to state they were "unsolicited." In so doing, Goldberg caused firm records to be inaccurate and false, and thereby evaded the scrutiny of his firms' compliance departments.

8. In the accounts of the five customers in which Goldberg engaged in fraudulent mutual fund switching, Goldberg caused the customers' signatures to be forged on new account forms and mutual fund switch letters. Additionally, Goldberg caused the falsification of some of the information relating to each customer's investment experiences, net worth, and risk tolerance on the new account forms. Goldberg used the false and inaccurate records he created or caused to be created to further his unsuitable and fraudulent mutual fund switching scheme, practice and course of business.

9. To further flout regulatory requirements, in connection with the accounts of four different customers separate from the fraud, from in or around January 2010 to November 2014, while he was registered at Newport, Goldberg instructed two different sales assistants to put their own California home addresses on the customer account documents. These four customers, two couples with four separate accounts, lived in Tennessee and Massachusetts – two states in which Goldberg was not licensed at the time. These two couples had no presence in California. Goldberg directed and caused the falsification of the primary residence addresses for these customers. In so doing, Goldberg misled his firms and thereby facilitated his undetected continued servicing of these out-of-state accounts at a time when he was no longer licensed to do so.

10. By creating or causing to be created inaccurate and false firm order memoranda, new account forms and mutual fund switch forms, Goldberg violated NASD Rules 3110 and 2110 and FINRA Rules 4511 and 2010.

RESPONDENT AND JURISDICTION

11. In May 1972, Goldberg became registered as a General Securities Representative (GSR) through a FINRA regulated firm. In March 1976, Goldberg became registered as a

General Securities Principal (GSP) with a different firm. In April 1977, Goldberg became registered as an Options Principal (OP) with the latter firm. Goldberg had been registered through consecutive associations with several different FINRA regulated firms from 1972 through November 2014.

12. On June 26, 1986, after a litigated hearing, the NYSE fined Goldberg $25,000 and suspended him for one month for misconduct similar to some of what is at issue here. The hearing panel found that Goldberg, while working at a then NYSE regulated firm, violated NYSE Rule 408(a) by exercising discretion without authorization and signing the names of customers to an options agreement and violated NYSE Rule 405(1) by failing to use due diligence to learn the essential facts relative to a customer.

13. From July 5, 2007 to October 2010, Goldberg was registered with FINRA as a GSR, GSP and OP through his association with J.P. Turner. Goldberg was terminated by J.P. Turner "based upon the result of an internal review of mutual fund switching activity in client accounts." From October 22, 2010 to November 2014, Goldberg was registered with FINRA as a GSR, GSP and OP through an association with Newport. On December 2, 2014, Newport filed a Form U5 terminating Goldberg's association with the firm due to Goldberg's "failure to follow the firm's policies and procedures."

14. Goldberg has not been registered with FINRA, or been associated with a FINRA member firm, since he was terminated by Newport on November 12, 2014.

15. Although Goldberg is no longer registered or associated with a FINRA member firm, he remains subject to FINRA's jurisdiction for purposes of this proceeding, pursuant to Article V, Section 4 of FINRA's By-Laws, because (1) the Complaint was filed within two years after the effective date of termination of Goldberg's registration with Newport, namely

December 2, 2014, and (2) the Complaint charges him with misconduct committed while he was registered with a FINRA member.

FACTS COMMON TO MOST CAUSES OF ACTION

16. Between August 2007 and August 2014, Goldberg serviced the accounts of customers ST, JC, JK, LR and LM. An Index of abbreviations of customer names and sales assistants' names is attached hereto as **Appendix 1**. Most of the accounts in question were IRAs or other accounts opened for the customers' long term investment needs. Most of the transactions Goldberg directed in these accounts were short term mutual fund trades and the purchases and sales of ETFs.

Customer ST

17. ST was an office manager for several medical offices prior to investing through Goldberg. ST met Goldberg in the early 1990s when Goldberg was dating ST's sister, whom Goldberg later married. When ST's first husband passed away in 1995, ST inherited approximately $185,000 from her late husband's life insurance, social security and pension plan. ST wanted to use this money to take care of her children. Goldberg offered to invest the money for ST, and she agreed to let him do so. ST thereby began a professional relationship with Goldberg in 1995.

18. Goldberg knew or should have known she could not afford to take risks with her money. Goldberg did not discuss with ST how he would invest her money and she trusted him to "do the right thing." ST did not ask, nor did Goldberg tell her, how many accounts he was opening in her name, how much money he would allocate to each account or what he planned to buy in each account. ST and Goldberg did not have a discussion regarding her investment experience. Prior to retaining Goldberg, ST had no investment knowledge or experience. ST

relied heavily upon Goldberg to handle her investment decisions. Even after her sister and Goldberg were divorced in or around 2005, ST continued to use Goldberg to service her investment accounts.

(a) ST's J.P. Turner Accounts – Mutual Fund Switching

19. In July and August 2007, Goldberg moved ST's accounts from his prior firm to J.P. Turner. At the time, ST was 49 years old. The accounts were moved without ST's prior knowledge or consent. Goldberg opened four non-discretionary J.P. Turner accounts for ST (IRA Account xxx4980, IRA Account xxx6460, Account xxx6842 and Account xxx1012). Goldberg serviced ST's J.P. Turner accounts until the time he was terminated from J.P. Turner in October 2010.

20. While servicing these accounts, Goldberg effected mostly short-term Class A mutual fund transactions. These switch transactions were contrary to ST's goals and objectives because she wanted to preserve the money in these accounts in order to take care of her children in the future. Goldberg knew or should have known that repeated short-term buying and selling of Class A mutual funds in these accounts would result in depleting the funds in light of the front-end sales loads and other charges. Additionally, given that mutual funds were meant for long-term investments, it was inconceivable that short-term selling of these funds would grow these accounts.

21. Accordingly, all 45 mutual fund switch transactions that Goldberg effected in ST's accounts while at J.P. Turner were unsuitable. Each of these trades is listed in the ST trading chart, which is attached hereto as **Exhibit A**. Each mutual fund was held for an average of approximately six months. For example, Goldberg effected the following short-term mutual fund trades in ST's J.P. Turner account # xxx4980 :

Account Number	Fund Name	Fund Symbol	Date Bought	Date Sold	Period of Time Held
xxx4980	American Funds Small Cap World A	SMCWX	October 2007	May 2008	7 months
xxx4980	Wells Fargo Advantage Divers Int'l A	SILAX	May 2008	February 2009	9 months
xxx4980	Van Eck Intl Investors Gold A	GHAAX	January 2009	June 2009	5 months
xxx4980	Invesco Van Kampen Technology Fund A	VTFAX	February 2009	August 2009	6 months
xxx4980	Franklin Natural Resources A	FRNRX	June 2009	December 2009	6 months
xxx4980	MFS Technology Class A	MTCAX	August 2009	January 2010	5 months
xxx4980	DWS Europe Equity A	SERAX	December 2009	April 2010	4 months
xxx4980	American Funds Small Cap World A	SMCWX	January 2010	May 2010	4 months

22. Additionally, in connection with ST's J.P. Turner account # xxx6460, Goldberg directed short-term mutual fund transactions including the following:

Account Number	Fund Name	Fund Symbol	Date Bought	Date Sold	Period of Time Held
xxx6460	Dreyfus Technology Growth A	DTGRX	September 2007	February 2008	5 months
xxx6460	Van Eck Intl Investors Gold A	INIVX	February 2008	November 2008	7 months
xxx6460	Invesco Van Kampen Technology Fund A	VTFAX	February 2009	August 2009	6 months
xxx6460	JP Morgan Latin America A	JLTAX	April 2009	September 2009	5 months
xxx6460	MFS Technology Class A	MTCAX	August 2009	January 2010	5 months
xxx6460	Eaton Vance Greater India A	ETGIX	September 2009	February 2010	5 months
xxx6460	American Funds Small Cap World A	SMCWX	January 2010	May 2010	4 months
xxx6460	Ivy Global Natural Resources A	IGNAX	February 2010	July 2010	5 months

23. Finally, in connection with ST's J.P. Turner account # xxx6842, Goldberg directed short term mutual fund transactions including the following:

Account Number	Fund Name	Fund Symbol	Date Bought	Date Sold	Period of Time Held
xxx6842	Evergreen Emerg Mkts A	EMGAX	October 2007	May 2008	7 months
xxx6842	Federated Internat'l Small-Mid Co A.	ISCAX	February 2008	November 2008	9 months
xxx6842	Templeton Developing Markets A	TEDMX	February 2008	November 2008	9 months
xxx6842	Ivy Global Natural Resources A	IVIAX	May 2008	November 2008	6 months
xxx6842	DWS Latin America A	SLANX	November 2008	April 2009	5 months
xxx6842	Prudential Jennison Natural Resources A	PGNAX	November 2008	May 2009	6 months
xxx6842	BlackRock Latin America Inv A	MDLTX	April 2009	August 2009	4 months
xxx6842	Ivy Global Natural Resources A	IGNAX	April 2009	September 2009	5 months
xxx6842	Seligman Global Smaller Companies A	SHGAX	August 2009	January 2010	5 months
xxx6842	Pacific Advisors Small Cap Value A	PASMX	September 2009	February 2010	5 months
xxx6842	DWS Latin America	SLANX	September 2009	February 2009	5 months
xxx6842	MFS Technology Class A	MTCAX	October 2009	February 2010	4 months
xxx6842	Delaware Emerging Markets A	DEMAX	January 2010	June 2010	5 months
xxx6842	Van Eck Global Hard Assets A	GHAAX	February 2010	June 2010	4 months

24. Goldberg's trading included patterns of in and out trading of certain mutual funds. For example,

- He sold the Eaton Vance Greater India fund in May 2008 in ST's xxx6460 account and then bought it back again in the same account in September 2009.
- He then sold that fund in February 2010 in ST's xxx6460 account and bought it back in ST's xxx1012 account in August 2010.

- Similarly, Goldberg went in and out of the Ivy Global Natural Fund several times across several of ST's accounts from 2007 to 2010.
- Further, in February 2010, Goldberg bought the Putnam Voyager Fund in ST's xxx6842 account and then sold it in March 2010.
- He then bought it again in May 2010 in ST's xxx4980 account and then sold it in July 2010 in ST's xxx6842 account.

25. This pattern of in and out trading was repeated consistently throughout ST's accounts, and caused her to pay sales charges and fees associated with Class A funds each time.

26. Goldberg at times sold ST's shares in a particular mutual fund category only to repurchase shares in the same or similar fund category in a different mutual fund family, thus incurring unnecessary fees and sales loads. For example, on February 25, 2008, Goldberg sold Prudential Jennison Natural Resources A (PGNAX) in customer ST's xxx6842 account. Two months later, on April 21, 2009, Goldberg bought Ivy Global Natural (IGNAX), another natural resources fund, for ST's xxx6842 account.

27. Goldberg's misconduct resulted in losses in ST's J.P. Turner accounts of approximately $75,000 from short term mutual fund transactions over the life of the account.

28. Goldberg generated commissions of at least $30,900 on short term mutual fund transactions in ST's accounts while at Turner.

(b) ST's Newport Accounts – Mutual Fund Switching

29. In November 2010, the assets in ST's accounts were transferred to non-discretionary accounts at Newport. Goldberg opened the following ST accounts at Newport: xxx2985 (later changed to xxx8693), rollover IRA xxxx3116 (later changed to xxx8706), xxx3736, and beneficiary account xxx8765. As was the case before, ST did not know her

accounts had been moved to Newport until she later received account statements from Newport. At Newport, Goldberg continued the same improper mutual fund switching practice. Goldberg's short-term mutual fund switches in ST's Newport accounts included the following:

Account Number	Fund Name	Fund Symbol	Date Bought	Date Sold	Period of Time Held
xxx3116	DWS Latin American Equity Fund A	SLANX	December 2010	May 2011	5 months
xxx2985	MFS Technology Fund A	MTCAX	January 2011	July 2011	6 months
xxx2985	DWS Latin American Equity Fund A	SLANX	January 2011	May 2011	4 months

30. Goldberg's trading activities at Newport continued to result in losses to ST's accounts. ST lost approximately $2,300 to her Newport accounts. In contrast, Goldberg generated approximately $3,800 in commissions on these trades at Newport.

(c) Forged ST Documents / Inaccurate Account Information

31. All of ST's new account forms at J.P. Turner and Newport contained forged signatures purporting to be ST's signatures. A chart of falsified customers' new account forms is attached hereto as **Exhibit B**. As mentioned above, ST learned that her accounts had been moved to J.P. Turner and then to Newport when she received account statements from those firms. ST did not sign new account forms opening the referenced accounts at either J.P. Turner (IRA Account xxx4980, IRA Account xxx6460, Account xxx6842 and Account xxx1012) or Newport (xxx2985 (later changed to xxx8693), rollover IRA xxxx3116 (later changed to xxx8706), and beneficiary account xxx8765). These new account forms also indicated that ST's investment objectives included "growth with high risk" and "speculative". This information was false. Goldberg knew or should have known that ST did not want to take risks with her accounts and wanted to preserve the funds in these accounts to take care of her children in the future.

32. Additionally, Goldberg caused the entry of 16 falsified mutual fund switch forms, associated with ST's accounts, to be entered into J.P. Turner's and Newport's books and records. A chart of the falsified switch forms is attached hereto as **Exhibit C**. Each of these forms contained signatures purporting to be ST's signature. ST did not sign these forms. Further, these forms identified most of the mutual fund switch transactions as "unsolicited." As mentioned above, Goldberg did not discuss any of these trades with ST and made all of these trades without consulting ST beforehand. Accordingly, all of these trades were "solicited" trades. Further, all of the customer reasons given for the subject trades were also fabricated. For example, J.P. Turner switch form dated 2/26/2008 in connection with ST's xxx6842 account indicated that ST was "afraid of commodities now! Likes Int'l and Dev. Mkt for now and long term." This information was fabricated. ST did not seek out these trades, and she did not provide Goldberg with the explanations contained on these 16 forms as to why these switch transactions were to be made. Importantly, Goldberg's signature appears on these documents as a certification that the information contained therein was accurate. Goldberg caused all of this false information to be included on these forms and into the firm's records.

33. Goldberg entered, or caused to be entered, approximately 124 trades into Turner's and Newport's electronic system where he falsely identified ST's mutual fund transactions as "unsolicited" when these transactions were all solicited.

(d) Exercising Discretion in ST's Accounts

34. Throughout the life of her accounts, Goldberg regularly exercised discretion in ST's accounts. Goldberg exercised discretion over when, and at what price, to purchase or sell securities for all of ST's accounts, identified above. Goldberg did not have the required written authorization from ST to exercise discretionary power in her accounts. Additionally, ST's

accounts had not been accepted, in writing, by J.P. Turner and/or Newport as discretionary accounts. All of Goldberg's improper discretionary trades effected in ST's accounts are documented in the attached ST Trading Chart and incorporated herein as Exhibit A.

35. In addition to the fraudulent mutual fund transactions identified in Exhibit A, Goldberg exercised discretion in ST's accounts and effected at least 22 different ETF transactions in ST's accounts. Goldberg directed all of the improper ETF transactions identified in Exhibit A, and incorporated herein.

Customer JC

36. Customer JC was 50 years old when she first began investing with Goldberg in 2006. JC was a traffic control coordinator for the Alaska Railroad Corporation and did not have any investment experience at the time she met Goldberg. In fact, JC's husband handled most of the investment decisions for all of their accounts. In or around 2006, JC inherited approximately $60,000 from her late father's estate. JC opened an investment account with Goldberg in order to invest this inheritance. Goldberg knew or should have known that her objective was to grow the money without being exposed to high risks through IRAs intended to facilitate JC's retirement income.

(a) JC's J.P. Turner Account – Mutual Fund Switching

37. In July 2007, Goldberg transferred the assets of JC's account at a prior firm to J.P. Turner without JC's knowledge or consent. While at J.P. Turner, Goldberg opened account xxx6915 (later changed to xxx1127) for JC. This account was a non-discretionary account. Goldberg serviced JC's account until the time he was terminated from J.P. Turner in October 2010.

38. Goldberg engaged in a series of 13 short-term Class A mutual fund transactions in JC's J.P. Turner account xxx6915. Each of the unsuitable trades being charged herein is documented in the attached JC Trading Chart, which is attached hereto as **Exhibit D**. Each mutual fund generally was held for between four and six months on average. This strategy of switching in and out of mutual funds was inconsistent with JC's known objective to preserve the balances in these accounts and conservatively grow the accounts.

39. In connection with account xxxx6915, JC's J.P. Turner IRA, Goldberg effected the following mutual fund short term trades:

Account Number	Fund Name	Fund Symbol	Date Bought	Date Sold	Period of Time Held
xxx6915	BlackRock Latin America Inv A	MDLTX	September 2007	February 2008	5 months
xxx6915	Investo Van Kampen Mid Cap A	VGRAX	October 2007	April 2008	6 months
xxx6915	Goldman Sachs Emerging Mkt A	GEMAX	February 2008	October 2008	8 months
xxx6915	Eaton Vance Greater India A	ETGIX	April 2008	November 2008	7 months
xxx6915	Wells Fargo Adv Asia Pacific A	WFAAX	July 2008	April 2009	9 months
xxx6915	Morgan Stanley Mid-Cap Growth Fund A	DGRAX	October 2008	April 2009	7 months
xxx6915	DWS Latin America A	SLANX	November 2008	July 2009	8 months
xxx6915	Hartford Small Company A	IHSAX	April 2009	September 2009	5 months
xxx6915	Jennison Natural Resources A	PGNAX	July 2009	December 2009	5 months
xxx6915	BlackRock Latin America Inv A	MDLTX	September 2009	February 2010	5 months
xxx6915	MFS Technology Class A	MTCAX	December 2009	April 2010	4 months
xxx6915	Ivy Global Natural Resources A	IGNAX	February 2010	June 2010	4 months
xxx6915	Eaton Vance Greater India A	ETGIX	April 2010	September 2010	5 months

40. Goldberg's trading also included patterns of in and out trading of certain mutual funds. For example, Goldberg sold the Eaton Vance Greater India Fund (ETGIX) in account xxx6915 in September 2007. He then bought it again in April 2008 in the same account. He later sold it in November 2008 and bought it again in April 2010 for the same account. Goldberg continued the in and out trading across JC's J.P. Turner and Newport accounts.

41. Goldberg's mutual fund switches caused JC losses of over $12,400 in account xxx6915 during the life of the account at J.P. Turner.

42. In contrast, Goldberg generated commissions of over $4,000 from trading JC's account xxx6915 during that same time period.

(b) JC's Newport Account – Mutual Fund Switching

43. Goldberg moved JC's assets from J.P. Turner to Newport in 2010 and opened account xxx5053 (later changed to xxx8857). Goldberg continued to engage in short term mutual fund transactions in JC's Newport account.

44. Goldberg effected the following short term transaction in account xxx5053:

Account Number	Fund Name	Fund Symbol	Date Bought	Date Sold	Period of Time Held
xxx5053	DWS Latin America Eqty Fund A	SLANX	February 2011	June 2011	4 months

45. Goldberg's short term trading activity in JC's Newport account resulted in a profit of approximately $307.

46. However, Goldberg generated commissions of over $400 from JC's Newport account.

(c) Forged JC Documents / Inaccurate Account Information

47. The new account form for J.P. Turner identified JC's risk tolerance as "moderate and aggressive." Goldberg knew or should have known that this information was incorrect. Further, the J.P. Turner new account form included forged signatures purporting to be JC's signature. JC did not sign this document. Goldberg forged or caused JC's signature to be forged on these documents. A chart of falsified customers' new account forms is attached hereto as Exhibit B.

48. Similarly, the new account form for JC's Newport account contained forged signatures purporting to be JC's signatures. JC did not sign these documents. Goldberg forged or caused JC's signature to be forged on this document. The Newport new account form also identified JC's investment objective as "capital appreciation with high risk" and "aggressive growth." This information was incorrect because Goldberg knew or should have known that JC's objective with this account was to achieve long-term growth with low risk in order to preserve the money in the account.

49. Further, Goldberg created or caused to be created a Newport switch letter, dated February 17, 2011, relating to JC's IRA at the firm. A chart of the falsified switch forms is attached hereto as Exhibit C. The switch letter contains a forged signature that does not belong to JC. Additionally, the document incorrectly identifies the transaction as "unsolicited" when Goldberg made this solicited trade without consulting JC. The asserted reason for the transaction was "Wants Latin America feels other emerging markets will slow down." This purported reason attributed to JC was also false. JC did not give Goldberg this information and did not speak with him about these trades. Importantly, Goldberg's signature appears on this document as a certification that the information contained therein was accurate. It was not.

50. Further, Goldberg entered or caused to be entered approximately 29 trades into Turner's and Newport's electronic system where he falsely identified JC's transactions as "unsolicited" when these transactions were all solicited.

(d) Exercising Discretion in JC's Accounts

51. Throughout the life of her accounts, Goldberg regularly exercised discretion in JC's accounts. Goldberg exercised discretion over when, and at what price, to purchase or sell securities for JC's accounts. Goldberg did not have the required written authorization from JC to exercise discretionary power in her accounts. Additionally, JC's accounts had not been accepted, in writing, by J.P. Turner and/or Newport as discretionary accounts. All of Goldberg's improper discretionary trades effected in JC's accounts are documented in the attached JC Trading Chart and incorporated herein as Exhibit D.

52. In addition to the fraudulent mutual fund transactions identified in Exhibit D, Goldberg exercised discretion in JC's accounts including effecting at least six different ETF transactions in JC's accounts. The improper ETF transactions identified in Exhibit D, and incorporated herein.

Customer JK

53. Customer JK was 65 years old and a widow when she invested with Goldberg in 2007. At the time, JK opened two accounts with Goldberg. JK was a hairstylist and owner of several hair salons at the time. Although JK and her late husband had invested in the stock market prior to meeting Goldberg, most of the investment decisions had been handled by her husband.

(a) JK's J.P. Turner Accounts – Mutual Fund Switching

54. In July and August 2007, the assets in JK's accounts were transferred from Goldberg's prior firm to J.P. Turner. JK was not aware that her assets had been transferred to J.P. Turner until she received account statements from J.P. Turner. Goldberg opened the following two J.P. Turner accounts for JK: IRA xxx8039 (later changed to xxx1184) and xxx7941 (later changed to xxx1673).

55. While at J.P. Turner, Goldberg engaged in a series of short-term Class A mutual fund switches in JK's non-discretionary accounts. Each mutual fund was held for less than eight months. These trades were unsuitable because, among other reasons, JK had informed Goldberg that her objective was growth with very little risk. Because short-term Class A mutual fund trades involve sales loads and other fees, frequently buying and selling these funds and holding them for less than eight months is not consistent with a growth objective.

56. Each of the unsuitable trades being charged herein is documented in the attached JK Trading Chart, which is attached hereto as **Exhibit E**. For example, in J.P. Turner account xxx8039, Goldberg effected the following short-term mutual fund trades:

Account Number	Fund Name	Fund Symbol	Date Bought	Date Sold	Period of Time Held
xxx8039	Eaton Vance Greater India A	ETGIX	January 2008	September 2009	8 months
xxx8039	DWS Latin America A	SLANX	September 2008	April 2009	7 months
xxx8039	Van Eck Intl Investors Gold A	GHAAX	April 2009	September 2009	5 months
xxx8039	Ivy Global Natural Resources A	IGNAX	September 2009	February 2010	5 months
xxx8039	Van Eck Intl Investors Gold A	GHAAX	February 2010	July 2010	5 months

57. While managing JK's account number xxx7941 at J.P. Turner, Goldberg entered into a series of short-term mutual fund transactions including, the following:

Account Number	Fund Name	Fund Symbol	Date Bought	Date Sold	Period of Time Held
xxx7941	DWS Latin America Equity A	SLANX	August 2007	January 2008	5 months
xxx7941	Eaton Vance Greater India A	ETGIX	January 2008	September 2009	8 months
xxx7941	DWS Latin America Equity A	SLANX	July & September 2008	December 2008	5 months & 3 months
xxx7941	Van Eck Internatn'l Investors Gold A	INIVX	December 2008	May 2009	5 months
xxx7941	Prudential Jennison Natural Resources A	PGNAX	May 2009	October 2009	5 months
xxx7941	DWS Latin America Equity A	SLANX	October 2009	March 2010	5 months
xxx7941	Templeton Developing Markets A	TEMGX	March 2010	July 2010	4 months

58. Goldberg's trading in JK's accounts included patterns of in and out trading of certain mutual funds. For example,

- Goldberg bought DWS Latin America Equity A (SLANX) for JK in account xxx7941 in August 2007 and sold it in account xxx8039 in January 2008.
- He again bought SLANX for account xxx7941 in July and September 2008 and sold it in December 2008 (account xxx7941) and also in April 2009 (account xxx8039).
- He then purchased SLANX again for account xxx7941 in October 2009 and sold it again in March 2010 in the same account.

59. Further, Goldberg at times bought and sold JK's shares in a particular mutual fund category only to repurchase shares a few months later in the same or similar fund category. For example, on April 21, 2009, Goldberg bought shares in Van Eck Global Hard Assets A (GHAAX) for JK's account xxx8039. This is a natural resources fund. He then sold it in

September 2009 in the same account. He then bought shares in Ivy Global Natural Resources (IGNAX) in September 2009 and sold it in February 2010. Goldberg then went back into GHAAX in February 2010 and again sold it in July 2010.

60. Due to Goldberg's short term mutual fund switches, JK lost more than $24,800 in her J.P. Turner accounts for the life of those accounts.

61. During the same time period, Goldberg generated commissions of approximately $8,400 from mutual fund switches in these accounts.

(b) JK's Newport Accounts – Mutual Fund Switching

62. In 2010, without JK's knowledge or consent, Goldberg transferred the assets in JK's two accounts from J.P. Turner to Newport. At Newport, Goldberg opened two accounts for JK -- xxx2738 (rollover IRA) and xxx2704 (family trust). Again, JK learned that her accounts had been moved to Newport only when she later received her first account statement from Newport. At Newport, Goldberg continued the same mutual fund switching activities for positions held for less than one year.

63. Although JK earned a profit of approximately $2,000, Goldberg generated commissions of approximately $1,500 on mutual fund switches in JK's Newport accounts for the life of the accounts.

(c) Forged JK Documents / Inaccurate Account Information

64. As discussed above, JK's relationship with Goldberg began in or around 2005 when Goldberg was registered with another member firm. From the very beginning, JK made it clear to Goldberg that she was not interested in high risk investments and that her objective was to preserve the principal in the accounts and grow the accounts conservatively. JK initially invested $75,000 with Goldberg in 2005 and later added another $10,000 to the accounts.

Goldberg forged, or caused to be forged, JK's signatures on the new account forms opening her two accounts at Newport. A chart of falsified new account customer forms is attached hereto as Exhibit B. As mentioned, JK did not learn that Goldberg had moved her accounts to Newport in 2010 until she began receiving account statements from Newport. Accordingly, JK did not execute new account forms to open these accounts at Newport. JK's signatures on the new account forms for these Newport accounts were all forged.

65. Additionally, JK's New Account Approval Forms for her accounts at Newport indicated her investment objectives as "short term growth with high risk" and "long term growth with greater risk - aggressive growth." As indicated above, JK had told Goldberg that she was not interested in high risk investments but wanted to preserve the principals of these accounts and keep the balances safe. Therefore, Goldberg caused these forms to misstate important information regarding JK's investment objectives.

66. Further, JK's account contained two mutual fund switch letters, both dated February 4, 2011, that purportedly contained her signatures. A chart of the falsified switch forms is attached hereto as Exhibit C. JK did not sign these documents and therefore her signatures on these documents were forged. Goldberg forged, or caused to be forged, the JK signatures on these documents. These switch letters further indicated that the mutual fund switch transactions were "unsolicited" and gave the purported reasons why JK was ordering the sale of the subject mutual funds as "Wants Latin America. Feels it will out-perform USA." JK was not aware that these mutual fund switch transactions were taking place, and therefore the transactions were in fact solicited by Goldberg. Also the purported reason given on these two switch letters as to why JK was ordering the mutual fund switches was fabricated. Goldberg's signature appears on

these two documents as a certification that the falsified information contained therein was accurate.

67. Goldberg entered, or caused to be entered, approximately 31 trades into Turner's and Newport's electronic system where he falsely identified JK's transactions as "unsolicited" when these transactions were all solicited.

(d) Exercising Discretion in JK's Accounts

68. Throughout the life of her accounts, Goldberg regularly exercised discretion in JK's accounts. Goldberg exercised discretion over when, and at what price, to purchase or sell securities for all of JK's accounts. Goldberg did not have the required written authorization from JK to exercise discretionary power in her accounts. Additionally, JK's accounts had not been accepted, in writing, by J.P. Turner and/or Newport as discretionary accounts. All of Goldberg's improper discretionary trades effected in JK's accounts are documented in the attached JK Trading Chart and incorporated herein as Exhibit E.

69. In addition to the fraudulent mutual fund transactions identified in Exhibit C, Goldberg exercised discretion in JK's accounts including effecting at least two ETF transactions in JK's accounts. Goldberg directed all of the improper ETF transactions identified in Exhibit E, and incorporated herein.

Customer LR

70. Customer LR was 59 years old when she invested with Goldberg at J.P. Turner in 2007. At the time of her investment, LR had been a flight attendant with United Airlines for many years. Goldberg and LR had been long-time friends. From the very beginning, LR informed Goldberg that her investment objectives were to protect the principal in her accounts and achieve long-term growth with very little risk.

(a) LR's J.P. Turner Accounts – Mutual Fund Switching

71. In July and August 2007, LR's assets were transferred from a prior firm to J.P. Turner without her prior consent. Goldberg opened the following three LR accounts at J.P. Turner: IRA account xxx8551 (later changed to xxx1215), IRA account xxx3849 (later changed to xxx1503) and xxx3881. Goldberg serviced these accounts until he was terminated from J.P. Turner in October 2010.

72. Between April 2009 and July 2010, Goldberg engaged in a series of Class A short-term mutual fund switch transactions in LR's accounts. These transactions are identified in the LR Trading Chart, attached hereto as **Exhibit F**. Again, each mutual fund was held for approximately six months. These short-term mutual fund switches were unsuitable for LR because Goldberg knew or should have known that her main objective was to preserve the money in her account in order to create a stream of income for herself and her husband upon retirement. Goldberg proceeded to engage in the repeated short-term purchasing and selling of Class A mutual funds which meant that LR's accounts were charged front-end sales loads, in addition to commissions. This practice was not consistent with LR's stated objectives of preserving the principal and growing the account.

73. Specifically, each of the unsuitable mutual fund trades being charged herein is documented in the attached LR Trading Chart, which is attached hereto and incorporated herein as Exhibit F. For example, Goldberg effected the following short-term mutual fund trades in LR's xxx8551 account:

Account Number	Fund Name	Fund Symbol	Date Bought	Date Sold	Period of Time Held
xxx8851	Eaton Vance Greater India A	ETGIX	October 2009	February 2010	4 months
xxx8851	Van Eck Global Hard Assets A	GHAAX	February 2010	July 2010	5 months

74. Goldberg effected the following short-term mutual fund transactions in LR's xxx3849 account:

Account Number	Fund Name	Fund Symbol	Date Bought	Date Sold	Period of Time Held
xxx3849	Eaton Vance Greater India A	ETGIX	April 2009	March 2010	11 months
xxx3849	Putnam Voyager A	PVOYX	March 2010	July 2010	4 months

75. Goldberg effected the following short-term mutual fund transactions in LR's xxx3881 account:

Account Number	Fund Name	Fund Symbol	Date Bought	Date Sold	Period of Time Held
xxx3881	Columbia Acorn USA A	LAIAX	November 2008	May 2009	6 months
xxx3881	DWS Latin America A	SLANX	May 2008	November 2008	6 months
xxx3881	MFS Technology Class A	MTCAX	October 2009	March 2010	5 months
xxx3881	Invesco Van Kampen Technology Fund Class A	VTFAX	May 2009	October 2009	5 months

76. Goldberg's activities resulted in cumulative losses in LR's J.P. Turner accounts of approximately $14,700 for the life of the accounts.

77. In contrast, Goldberg generated commissions of approximately $3,300 from LR's J. P. Turner accounts.

(b) LR's Newport Account – Mutual Fund Switching

78. At Newport, Goldberg opened accounts xxx4163 (later changed to xxx8802), IRA xxx3868, and xxx6425 (beneficiary account) for LR in 2010. While at Newport, Goldberg sold one position he had purchased for LR nine months previously in her J.P. Turner account. This transaction is identified in Exhibit F.

(c) Forged LR Documents / Incorrect Account Information

79. When she first opened her account, LR informed Goldberg that she "did not have a lot of money" and was only interested in "safe investments." LR informed Goldberg that she was not interested in investments with a high risk but wanted to preserve the value of the accounts. She told Goldberg not to be aggressive with the investments and that the main purpose of opening the accounts with him was to create a retirement plan for her husband who was self-employed.

80. Between 2007 and 2010, LR earned approximately $45,000 in annual income. She and her husband did not have many other investments and lived "paycheck-to-paycheck" without having much in savings. In spite of this, Goldberg caused LR's new account documents at J.P. Turner, for accounts for account xxx8551, xxx3881 and xxx3849, to indicate that LR had a net worth of "over $500,000." He also caused the information on these forms to identify LR's risk tolerance as "moderate and aggressive." This information was false. A chart of falsified new account customer forms is attached hereto as Exhibit B.

81. Also, LR was not aware that her assets had been transferred to J.P. Turner and Newport until she subsequently received statements from those companies. Accordingly, LR did not sign the new account forms for J.P. Turner accounts xxx8551, xxx3849, and xxx3881. LR also never signed the new account forms for Newport accounts xxx3868, xxx6425 and xxx4163. However, these documents contained signatures purporting to be LR's signatures. These documents also contained Goldberg's signature as the principal handling the account and thereby attesting that the information contained therein came from the LR. However, Goldberg forged or caused to be forged LR's signatures on to these account documents and the information contained therein had been fabricated.

82. Further, Goldberg caused Newport's mutual fund switch form, dated 12/22/10, to indicate that the mutual fund transaction in connection with account xxxx4163 was unsolicited. A chart of the falsified switch forms is attached hereto as Exhibit C. This information is false because Goldberg solicited the transaction. The form also gave LR's purported reason for requesting the transaction as "Feels world emberg. Mkts a little overdone. Wants Brazil and oil funds in future." All of this information was false.

83. Goldberg entered, or caused to be entered, approximately 13 trades into J.P. Turner's and Newport's electronic systems where he falsely identified LR's transactions as "unsolicited" when these transactions were all solicited. Indicating that these transactions were "unsolicited" created false records in the firms' systems.

(d) Exercising Discretion in LR's Accounts

84. Throughout the life of her accounts, Goldberg regularly exercised discretion in LR's accounts. Goldberg exercised discretion over when, and at what price, to purchase or sell securities for all of LR's accounts. Goldberg did not have the required written authorization from LR to exercise discretionary power in her accounts. Additionally, LR's accounts had not been accepted, in writing, by J.P. Turner and/or Newport as discretionary accounts. All of Goldberg's improper discretionary trades effected in LR's accounts are documented in the attached LR Trading Chart and incorporated herein as Exhibit F.

Customer LM

85. Customer LM was 52 years old when she first started investing with Goldberg in 2005. LM had worked in advertising at a local newspaper at or around the time she first began investing with Goldberg. LM became one of Goldberg's clients because she had inherited a real estate investment account from her father and Goldberg managed that account. LM did not have

any prior investment experience. When the real estate market crashed in or around 2008, the real estate investment account she had inherited lost most of its value. At this time, LM informed Goldberg that her investment objective was to preserve the remaining funds and conservatively grow the money. LM specifically told Goldberg "try not to make the money disappear."

(a) LM's J.P. Turner Accounts - Mutual Fund Switching

86. In July 2007, Goldberg transferred the assets from LM's account at a prior firm and opened the following four accounts at J.P. Turner: IRA xxx8420 (later changed to xxx1210), Roth IRA xxx5273, account xxx1119 and xxx2270 (later changed to xxx1747). Goldberg serviced these accounts until the time he was terminated from J.P. Turner in October 2010.

87. Throughout the life of these accounts, Goldberg engaged in a series of short-term Class A mutual fund switches in LM's accounts. Each of the unsuitable trades being charged herein is documented in the attached LM Trading Chart, which is attached hereto and incorporated herein as **Exhibit G**. Each mutual fund was held for an average of six months. For example, Goldberg effected the following mutual fund transactions in account xxx8420:

Account Number	Fund Name	Fund Symbol	Date Bought	Date Sold	Period of Time Held
xxx8420	Eaton Vance Greater India A	ETGIX	April 2008	November 2008	7 months
xxx8420	DWS Latin America A	SLANX	November 2008	July 2009	8 months
xxx8420	Eaton Vance Greater India A	ETGIX	July 2009	December 2009	5 months
xxx8420	MFS Technology Class A	MTCAX	December 2009	April 2010	4 months
xxx8420	Eaton Vance Greater India A	ETGIX	April 2010	September 2010	5 months

88. Goldberg's trading in LM's account included patterns of in and out trading of certain mutual funds. For example, as seen in the above chart, Goldberg purchased and sold the Eaton Vance Greater India A fund in three short term transactions over three years.

89. These mutual fund switch transactions were unsuitable for LM because, among other things, Goldberg knew or should have known that LM's objective was to preserve the money in these accounts in order to have income upon retirement. The constant buying and short-term selling of Class A mutual funds was inconsistent with this objective.

90. LM incurred a loss of approximately $600 due to Goldberg's mutual fund switches in her J. P. Turner accounts throughout the life of the accounts.

91. Goldberg generated commissions of at least $400 from the mutual fund switches in LM's accounts at J.P. Turner.

(b) LM's Newport Accounts – Mutual Fund Switching

92. While at Newport, Goldberg opened several accounts for LM, including rollover IRA xxx5095 (later changed to xxx8861), xxx5111 (later changed to xxx8863), Roth IRA xxx5103 (later changed to xxx8862), account xxx6053 and account xxx0060.

93. At Newport, Goldberg continued to effect short term mutual fund transactions in LM's accounts. For example, in September 2010, Goldberg bought SLANX for LM's xxx1119 account. Less than a year later, in July 2011, he sold SLANX in LM's xxx5111 account. All of Goldberg's short term mutual fund transactions in LM's accounts are attached hereto in Exhibit G and hereby incorporated.

94. LM's accounts at Newport incurred losses of approximately $1,600 for the life of the accounts due to Goldberg's short term mutual fund transactions.

(c) Forged LM Documents / Incorrect Account Information

95. As mentioned above, LM was not aware that her accounts had been transferred to J.P. Turner, and later Newport, until she received account statements from these firms. Therefore, LM did not sign the new account forms opening the accounts with J.P. Turner or

Newport. The signatures purporting to be LM's signature on new account forms for accounts xxx8420, xxx5273, xxx5111, xxx5095, xxx5103, xxx0060 and xxx6053 are all forged signatures. Goldberg forged or caused to be forged LM's signatures on these forms. LM also did not sign the Transfer of Assets form in connection with Turner account xxx2270. Goldberg caused LM's signature to be forged on this document. A chart of falsified customer account forms is attached hereto as Exhibit B.

96. Also, although LM had informed Goldberg that she was interested only in safe investments (low in risk), Goldberg caused LM's new account forms for her J.P. Turner accounts xxx8420 and xxx5273 to indicate that LM's investment objective as "aggressive." Similarly, Goldberg caused LM's Newport account forms for accounts xxx5103, xxx5111, and xxx5095 to indicate that her investment objective was "short term growth with high risk," "speculative" and "capital appreciation with high risk." All of this information was false.

97. Further, although LM only had approximately $10,000 in the bank, and had no other liquid cash, Goldberg caused LM's new account forms for accounts xxx5103, xxx5111, and xxx5095 to indicate that she had over $500,000 in liquid cash with a net worth of over $500,000, excluding her primary residence. This information was false and Goldberg knew or should have known this to be the case at the time.

98. Goldberg entered, or caused to be entered, approximately 22 trades into Turner's and Newport's electronic systems where he falsely identified LM's transactions as "unsolicited" when these transactions were all solicited.

(d) Exercising Discretion in LM's Accounts

99. Throughout the life of her accounts, Goldberg regularly exercised discretion in LM's accounts. Goldberg exercised discretion over when, and at what price, to purchase or sell

securities for all of LM's accounts. Goldberg did not have the required written authorization from LM to exercise discretionary power in her accounts. Additionally, LM's accounts had not been accepted, in writing, by J.P. Turner and/or Newport as discretionary accounts. All of Goldberg's improper discretionary trades effected in LM's accounts are documented in the attached LM Trading Chart and incorporated herein as Exhibit G.

100. In addition to the fraudulent mutual fund transactions identified in Exhibit G, Goldberg exercised discretion in LM's accounts including effecting at least 28 different ETF transactions in LM's accounts. Goldberg directed all of the improper ETF transactions identified in Exhibit G, and incorporated herein.

In and out trading across customer accounts

101. Goldberg's lack of investment strategy for the above referenced customers' accounts is exemplified in the patterns that emerge across the customer accounts. Goldberg's decision to buy or sell a customer's mutual fund shares did not reflect his assessment of the performance of a particular fund. In fact, Goldberg often bought a fund for one customer and around the same time that he sold the same fund in another customer's account. For example,

- On September 11, 2007, Goldberg sold shares of Eaton Vance Greater India A (ETGIX) from customer JC's Account.
- Six days later, on September 17, 2007, Goldberg bought shares of ETGIX for customer LR's account.
- Approximately seven months later, on April 25, 2008, Goldberg repurchased shares of ETGIX for customer JC's account.
- A few weeks later, in May 2008, Goldberg sold shares of ETGIX in the accounts of customers LR and ST.

- On October 12, 2009, Goldberg bought shares of ETGIX shares for customer LR's account.
- Two months later, on December 11, 2009, Goldberg sold shares of ETGIX in customer LM's account.
- Similarly, on February 11, 2010, Goldberg bought shares of Ivy Global Natural Resources A (IGNAX) for customer JC's account.
- One day later, on February 12, 2010, Goldberg sold shares of IGNAX from customer JK's account.

Falsification of Customer Addresses

102. While at J.P. Turner, Goldberg instructed his sales assistant, DS, to falsify the records for accounts held by customers NB and RB. Beginning in January 2010, Goldberg was not licensed as a securities representative in the state of Tennessee. Customers NB and RB, long time Goldberg customers, remained Tennessee residents. Goldberg instructed his sales assistant, DS, to put her California home address into J.P. Turner's system as the address of record for customers NB and RB. Sales assistant DS complied with this instruction. A chart of falsified customer account forms is attached hereto as Exhibit B.

103. DS left Goldberg's employment in 2010. When Goldberg moved to Newport in November 2010, he transferred NB and RB's accounts to Newport. These accounts, as received by Newport, contained DS's California address as the address of record for these customers. When his former sales assistant, DS, refused to continue accepting these customers' account information at her home, Goldberg then instructed his new sales assistant, MM, to falsify the account records by changing the address on file to MM's California address. He then continued to instruct MM to falsify the address on file for these customers by filing several change of

address forms to continuously update the firm records to reflect new fraudulent addresses for these customers.

104. Similarly, at all relevant times, customers KN and RL lived in Jamaica Plains, Massachusetts. While at Newport, Goldberg was only periodically registered in Massachusetts. During the periods of registration lapses, Goldberg was not licensed as a securities representative in Massachusetts. Goldberg instructed his assistant, MM, to submit a change of address form changing KN and RL's address of record to MM's address.

105. The change of address forms included signatures purporting to be signatures belonging to customers KN, RN & NB. However, these customers did not sign these documents and did not know these documents existed. A chart of falsified customer change of address forms is attached hereto as **Exhibit H**.

106. In so instructing DS and MM, Goldberg caused the falsification of J.P. Turner's and Newport's books and records in connection with NB, RB, KN and RL's accounts.

FIRST CAUSE OF ACTION

Willful Violations of Section 10(b) of the Exchange Act, Rule 10b-5 (a) & (c) promulgated thereunder and Acting in Contravention of Sections 17(a)(3) of the Securities Act 1933 and Thereby Violating NASD Rule 2110 and FINRA Rule 2010 and also Violating NASD Rule 2120 and 2110 and FINRA Rules 2020 and 2010

107. The Department realleges and incorporates by reference paragraphs 1 through 106, above.

108. Section 10(b) of the Exchange Act prohibits the use of any "manipulative or deceptive device or contrivance" in connection with the purchase or sale of a security.

109. Rule 10(b)5, promulgated under the Exchange Act, provides that:

> It shall be unlawful for any person, directly or indirectly, by the use of any means or instrumentality of interstate commerce, or of the mails or of any facility of any national securities exchange.

(a) To employ any device, scheme, or artifice to defraud,

. . ., or

(c) To engage in any act, practice or course of business which operates or would operate as a fraud or deceit upon any person, in connection with the purchase or sale of any security.

110. Section 17(a)(1) of the Securities Act makes it unlawful, in the offer or sale of a security, "directly or indirectly . . . (1) to employ any device, scheme or artifice to defraud." A violation of Section 17(a) is a violation of FINRA Rule 2010.

111. NASD Rule 2120 prohibited the same misconduct. NASD Rule 2120 was renumbered as FINRA Rule 2020 on December 15, 2008.

112. From August 2007 through February 2012, Goldberg engaged in a scheme, practice and course of business through which he directed approximately 90 short-term mutual fund transactions in the accounts belonging to customers JK, LR, ST, LM, and JC. These transactions are identified in the customer trading charts attached hereto. Trading Charts for Customers ST, JC, JK, LR, and LM, are attached hereto as Exhibits A, D, E, F and G, respectively. All of those customers had trusted Goldberg to invest their money in their best interests, and he used that trust to trade in his own interest instead. His trading strategy in the accounts of these customers had no purpose other than to generate commissions for himself.

113. Goldberg acted with scienter. He intentionally or at least recklessly handled the accounts of customers JK, LR, ST, LM, and JC in a manner in which he placed his interests above his customer's interests. Specifically, Goldberg traded these accounts with the intention and for the purpose of generating commissions for himself and without the intention of serving the customers' interests.

114. In connection with his misconduct, Goldberg employed the means of interstate commerce and the mails by causing confirmations and account statements reflecting the subject trades to be sent to customers JK, LR, ST, LM, and JC.

115. The approximately 90 short-term mutual fund switch transactions effected in these accounts was inconsistent with the customers' financial circumstances and/or investment objectives.

116. By reason of the foregoing, Goldberg willfully violated Section 10(b) of the Securities Exchange Act of 1934, Rule 10b-5(a) and (c) promulgated thereunder, and willfully acted in contravention of Section 17(a)(1) of the Securities Act of 1933 thereby violating NASD Rule 2110 and FINRA Rule 2010 and also violated FINRA Rules 2020 and 2010 (for misconduct on or after December 15, 2008) and NASD Rules 2120 and 2110 (for misconduct prior to December 15, 2008).

SECOND CAUSE OF ACTION

(IN THE ALTERNATIVE TO THE FIRST CAUSE OF ACTION)

Use of Interstate Commerce for Purposes of Fraud or Deceit, in Contravention of Sections 17(a)(3) of the Securities Act 1933 and Therefore in violation of NASD Rule 2110 and FINRA Rule 2010

117. The Department realleges and incorporates by reference paragraphs 1 through 116, above.

118. Section 17(a) of the Securities Act of 1933 makes it unlawful, in the offer or sale of any security, "directly or indirectly . . . (3) to engage in any transaction, practice, or course of business which operates or would operate as a fraud or deceit upon the purchaser." A violation of Section 17 of the Securities Act is a violation of FINRA Rule 2010.

119. From August 2007 through February 2012, Goldberg engaged in a practice and course of business through which he directed approximately 90 short-term mutual fund

transactions in the accounts belonging to customers JK, LR, ST, LM, and JC without the knowledge of the customers prior to the trades. The specific short term transactions at issue are identified in the Trading Charts for Customers ST, JC, JK, LR, and LM, which are attached hereto as Exhibits A, D, E, F and G, respectively. All of those customers had trusted Goldberg to invest their money in their best interests, and he used that trust to trade in his own interest instead. His trading strategy in the accounts of these customers had no purpose other than to generate commissions for himself and operated as a fraud and deceit upon the customers.

120. Goldberg acted at least negligently when he handled the accounts of customers JK, LR, ST, LM, and JC in a manner in which he placed his interests above his customers' interests. Specifically, Goldberg traded these accounts in a manner that generated substantial commissions for himself while generating substantial losses for his clients. The patterns of in and out trading over short time periods could not have served the customers' investment objectives and risk tolerances.

121. In connection with his misconduct, Goldberg employed the means of interstate commerce and the mails by causing confirmations and account statements reflecting the subject trades to be sent to customers JK, LR, ST, LM, and JC.

122. By reason of the foregoing, Goldberg acted in contravention of Sections 17(a)(3) of the Securities Act and thereby violated FINRA Rule 2010 (for misconduct on or after December 15, 2008) and NASD Rule 2110 (for misconduct prior to December 15, 2008).

THIRD CAUSE OF ACTION
Unsuitable Mutual Fund Switching/Trading
(NASD Rules 2310 and 2110, IM-2310-2, and FINRA Rules 2111 and 2010)

123. The Department realleges and incorporates by reference paragraphs 1 through 122 above.

124. Goldberg effected short-term mutual fund transactions in the accounts belonging to customers JK, LR, ST, LM and JC, usually selling the investment after only approximately five to six months, only to buy and sell another mutual fund. The violative conduct lasted throughout the life of these accounts when Goldberg was the sole registered representative assigned to the accounts. A list of the violative transactions is attached hereto in the Trading Charts for Customers ST, JC, JK, LR, and LM, attached hereto as Exhibits A, D, E, F and G, respectively.

125. NASD Rule 2310(a) requires that a registered representative "have reasonable grounds for believing that the recommendation is suitable for such customer upon the basis of the facts, if any, disclosed by such customer as to his other security holdings and as to his financial situation and needs." This rule was superseded by FINRA Rule 2111 on July 9, 2012, which in substance requires the same.

126. A pattern of mutual fund switching is presumptively unsuitable and therefore presumptively a violation of NASD Rule 2310(a) and FINRA Rule 2111.

127. Additionally, NASD Rule 2110, superseded by FINRA Rule 2010, requires that an associated person, in the conduct of his/her business, "shall observe high standards of commercial honor and just and equitable principles of trade."

128. As demonstrated above, Goldberg engaged in extensive short-term mutual fund switch transactions in accounts belonging to five different customers. As explained in detail above, Goldberg also bought mutual funds in one customer's account while at the same time selling the same funds in another customer's account. He further sold customers' shares in a particular mutual fund only to later repurchase shares in the same fund for the same customers. Goldberg did so without having reasonable grounds for believing that such transactions were

suitable for these customers in view of the nature, frequency, and size of the recommended transactions and in light of each customer's financial situation, investment objectives, risk tolerance and circumstances. All of the unsuitable trades identified in the attached customer trading charts violated FINRA rules.

129. Additionally, Goldberg only bought and sold Class A mutual funds in these accounts. These shares necessitated that each of the subject customers pays upfront sales charges, known as "front-end loads", for each of these trades. The collective amount of sales charges paid by these five customers was at least $53,100.

130. Goldberg did not discuss with these customers the different types of shares available for investment, or the sales charges and operating expenses associated with each share class and their effect on potential returns. Goldberg also did not disclose cost-saving options that were available.

131. During the approximately six years that Goldberg engaged in short-term mutual fund switch transactions, customers JK, LR, ST, LM, and JC, collectively suffered approximately $129,000 in account losses due to Goldberg's unsuitable recommendations and unethical conduct. Conversely, from these five customers, Goldberg generated approximately $53,000 in commissions from these activities.

132. Importantly, no unusual circumstances existed to justify a clear departure from standard mutual fund trading practice. The mutual fund switches charged herein made no economic sense. Goldberg did not have reasonable grounds for believing that his recommendations, and these transactions, were suitable for these customers.

133. Accordingly, by engaging in the above-described unsuitable short-term mutual fund switch transactions, Goldberg violated NASD Rules 2310 and IM-2310-2 (for misconduct

pre-dating July 9, 2012) and FINRA Rules 2111 (for misconduct on or after July 9, 2012). Goldberg also violated NASD Rule 2110 (for misconduct pre-dating December 15, 2008) and FINRA Rule 2010 (for misconduct on or after December 15, 2008).

FOURTH CAUSE OF ACTION
Exercising Discretion Without Written Authorization
(NASD Rules 2510 and 2110 and FINRA Rule 2010)

134. The Department realleges and incorporates by reference paragraphs 1 through 133 above.

135. NASD Rule 2510(b) states that no "registered representative shall exercise any discretionary power in a customer's account unless such customer has given prior written authorization to a stated individual or individuals and the account has been accepted by the member, as evidenced in writing by the member or the partner, officer or manager, duly designated by the member, in accordance with Rule 3010."

136. From August 2007 through August 2014, Goldberg regularly exercised discretion in accounts belonging to customers ST, LM, JC, JK and LR by engaging in short term switch transactions involving mutual funds and ETFs. The specific trades in question are identified in the attached customer trading charts. Trading Charts for Customers ST, JC, JK, LR, and LM, are attached hereto as Exhibits A, D, E, F and G, respectively. Goldberg exercised discretion over when, and at what price, to purchase or sell securities for these accounts. He also exercised discretion over which securities to purchase for these accounts without consulting the customers.

137. However, Goldberg did not have written authorization from any of these customers to exercise discretionary power in these accounts. Additionally, these accounts had not been accepted in writing by J.P. Turner or Newport as discretionary accounts. Goldberg therefore exercised discretion in these accounts without written authorization.

138. Due to his wrongful exercise of discretion in these accounts, Goldberg caused the accounts belonging to Customers ST, LM, JC, JK and LR to incur losses of approximately $123,600. In connection with those transactions, Goldberg generated approximately $77,900 in commissions.

139. By exercising discretionary power in these accounts without written authorization from the customers or approval by the relevant firm, Goldberg violated NASD Rules 2510(b) and FINRA Rule 2010 (for misconduct on or after December 15, 2008) and NASD Rule 2110 (for misconduct prior to December 15, 2008).

FIFTH CAUSE OF ACTION
Falsification of Electronic Records,
Mutual Fund Switch Forms and New Account Documents
(NASD Rules 3110 and 2110 and FINRA Rules 4511 and 2010)

140. The Department realleges and incorporates by reference paragraphs 1 through 139 above.

141. As described in detail above, Goldberg falsified, or caused to be falsified, information in the electronic trading systems, mutual fund switch letters and new account forms associated with the accounts belonging to customers JK, LR, ST, LM, and JC.

142. When directing trades for his customers at J.P. Turner and Newport, Goldberg or someone else at his direction, entered the order information into an electronic trading system. Included in the entered information was whether the trade was "solicited" or "unsolicited." As described above, Goldberg or someone under his direction, from August 2007 through August 2014, repeatedly marked trades in the accounts of LR, LM, JC, JK and ST as "unsolicited" when those trades were in fact solicited. All 238 trades in the attached trading charts that are marked "unsolicited" were falsely marked in the electronic trading systems of Goldberg's then firm. By this misconduct, Goldberg caused the books and records of his firms to be inaccurate.

143. From July 2007 through October 2010, Goldberg provided false information to J.P. Turner regarding the mutual fund transactions he executed in connection with accounts belonging to customers JK, LR, ST, LM, and JC. As described above, Goldberg effected all of the mutual fund trades described in Exhibits A, D, E, F and G without consulting with these customers. Therefore, each of those trades was a solicited trade. Nevertheless, during this time, Goldberg falsely identified those J.P. Turner transactions as "unsolicited" on the Mutual Fund Disclosure Letters relating to those trades, or caused these transactions to be so identified. Goldberg also caused false information pertaining to the basis for these short term mutual fund transactions to be included in the above-described falsified mutual fund switch letters. A chart of the falsified switch forms is attached hereto as Exhibit C. Accordingly, Goldberg's actions caused J. P. Turner to maintain inaccurate books and records.

144. From November 2010 through April 2013, Goldberg provided false information to Newport regarding the mutual fund transactions involving customers JK, LR, ST, LM and JC. As explained above, Goldberg effected all of the mutual fund trades listed in Exhibits A, D, E, F and G without consulting with these customers. Therefore, each of those trades was a solicited trade. Goldberg falsely identified those Newport transactions as "unsolicited" in Mutual Fund Exchange Forms relating for those trades, or caused these transactions to be so identified. Goldberg also caused false information pertaining to the basis for these short term mutual fund transactions to be included in the above-described falsified mutual fund switch letters. A chart of the falsified switch forms is attached hereto as Exhibit C. Goldberg's actions caused Newport to maintain inaccurate books and records.

145. Additionally, Goldberg caused the falsification of customers' new account forms, identified above, in connection with accounts belonging to customers JK, LR, ST, LM and JC.

It was Goldberg's practice to fill out or direct his sales assistant to fill out the Investment Objectives, Net Worth, and Investment Experience sections on the New Account Approval Forms for each of these customers. As described in more detail above, Goldberg did not consult with JK, LR, ST, LM or JC to obtain the correct information for the new account forms and instead simply fabricated the information when he filled out the forms or caused the forms to be filled out. As a result, these documents contained false information relating to each customer's net worth, investment objectives, and risk tolerance. A chart of falsified new account customer forms is attached hereto as Exhibit B. Goldberg's actions caused the firms to maintain inaccurate books and records.

146. By reason of the foregoing, Goldberg violated NASD Rules 3110(a) (for misconduct predating December 5, 2011) and FINRA Rule 4511(a) (for misconduct on or after December 5, 2011) and NASD Rule 2110 (for misconduct pre-dating December 15, 2008), FINRA Rule 2010 (for misconduct on or after December 15, 2008).

SIXTH CAUSE OF ACTION
Forgery of Customer Signatures
(NASD Rules 3110 and 2110 and FINRA Rules 4511 and 2010)

147. The Department realleges and incorporates by reference paragraphs 1 through 146 above.

148. Both J.P. Turner and Newport required new customers to execute new account forms when opening an investment account with these firms. As described above, these firms also required customers to execute mutual fund switch forms when selling a position in one mutual fund and using the proceeds to purchase shares in another mutual fund.

149. In connection with accounts belonging to customers JK, LR, ST, LM and JC, Goldberg caused the forgery of each customer's signature on new account forms and mutual

fund switch letters. On the identified new account forms and mutual fund switch letters, Goldberg signed the customers' names or caused the customers' names to be signed by someone other than the customers. Goldberg did not have authorization to sign the customers' names or to cause someone else to sign these customers' names on these documents.

150. The specific customer account forms that contain forged customer signatures are listed in Exhibit B. A chart of the falsified switch forms is attached hereto as Exhibit C.

151. By reason of the foregoing, Goldberg violated NASD Rules 3110(a) (for misconduct predating December 5, 2011) and FINRA Rule 4511(a) (for misconduct on or after December 5, 2011) and NASD Rule 2110 (for misconduct pre-dating December 15, 2008), FINRA Rule 2010 (for misconduct on or after December 15, 2008).

SEVENTH CAUSE OF ACTION
Falsification of Records – Customer Addresses
Customers NB, RB, KN and LR
(NASD Rules 2110 and 3110 and FINRA Rules 4511 and 2010)

152. The Department realleges and incorporates by reference paragraphs 1 through 151 above.

153. From in or around January 2010 through November 2014, Goldberg caused false information to be included in the books and records for J.P. Turner and Newport by instructing his sales assistants to place their personal home addresses in the firms' systems as the addresses of record for Customers NB, RB, KN and RL.

154. In doing so, Goldberg misled the firms.

155. By providing false information to J.P. Turner and Newport, Goldberg violated NASD Rules 3110(a) (for misconduct predating December 5, 2011) and FINRA Rule 4511(a) (for misconduct on or after December 5, 2011) and NASD Rule 2110 (for misconduct pre-dating December 15, 2008), FINRA Rule 2010 (for misconduct on or after December 15, 2008).

RELIEF REQUESTED

WHEREFORE, the Department respectfully requests that the Panel:

A. order that one or more of the sanctions provided under FINRA Rule 8310(a) be imposed, including (i) barring Respondent from associating with any FINRA registered firm in any capacity; and (ii) order that Respondent be required to disgorge fully any and all ill-gotten gains and/or make full and complete restitution, together with interest; and

B. order that the Respondent bear such costs of the proceeding as are deemed fair and appropriate under the circumstances in accordance with FINRA Rule 8330; and

C. make specific findings that Respondent willfully violated Section 10(b) of the Exchange Act and Rule 10b-5(a) and (c) thereunder.

FINRA DEPARTMENT OF ENFORCEMENT

Date: August 28, 2015

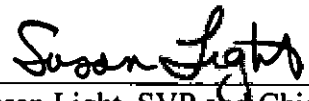

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Exhibit A

ST TRADING CHART
EXHIBIT A

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
1	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	1/20/2010	1/25/2010	B	DEMAX	DELAWARE EMERGING	Diversified Emerging Mkts	14.79	2366.464
2	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	6/21/2010	6/24/2010	S	DEMAX	DELAWARE EMERGING	Diversified Emerging Mkts	13.32	2366.464
3	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	9/18/2007	9/21/2007	B	DTGRX	DREYFUS PREMIER TECH	Technology	29.35	729.131
4	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	2/25/2008	2/28/2008	S	DTGRX	DREYFUS PREMIER TECH	Technology	24.33	729.131
5	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	10/23/2007	10/26/2007	B	EMGAX	EVERGREEN EMERG MKTS	Diversified Emerging Mkts	30.72	781.25
6	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	5/15/2008	5/20/2008	S	EMGAX	EVERGREEN EMERG MKTS	Diversified Emerging Mkts	25.61	781.25
7	XXX1012	ST	JP TURNER	LEONARD GOLDBERG	8/24/2010	8/27/2010	B	ETGIX	EATON VANCE GREATER	India Equity	26.58	146.727
8	XXX3116	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	5/17/2011	5/20/2011	S	ETGIX	EATON VANCE GREATER	India Equity	24.49	146.727
9	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	9/15/2009	9/18/2009	B	ETGIX	EATON VANCE GREATER	India Equity	22.04	458.258

ST TRADING CHART
EXHIBIT A

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
10	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	2/18/2010	2/23/2010	S	ETGIX	EATON VANCE GREATER	India Equity	22.32	458.258
11	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	11/6/2007	11/9/2007	B	ETGIX	EATON VANCE GREATER	India Equity	40.22	594.232
12	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	5/21/2008	5/27/2008	S	ETGIX	EATON VANCE GREATER	India Equity	24.97	676.155
13	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	1/24/2011	1/27/2011	S	FRNRX	FRANKLIN NATURAL	Natural Resources	39.66	768.224
14	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	6/15/2009	6/18/2009	B	FRNRX	FRANKLIN NATURAL	Natural Resources	28.1	154.804
15	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	12/9/2009	12/14/2009	S	FRNRX	FRANKLIN NATURAL	Natural Resources	29.75	154.804
16	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	6/22/2010	6/25/2010	B	FRNRX	FRANKLIN NATURAL	Natural Resources	31.62	759.013
17	XXX3736	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	12/14/2010	12/17/2010	B	GBFAX	VAN ECK EMERGING MARKETS	Diversified Emerging Mkts	14.42	724.688
18	XXX3736	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	7/14/2011	7/19/2011	S	GBFAX	VAN ECK EMERGING MARKETS	Diversified Emerging Mkts	13.3	724.688

ST TRADING CHART
EXHIBIT A

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
19	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	12/5/2007	12/10/2007	B	GEMAX	GOLDMAN SACHS	Diversified Emerging Mkts	32.55	150.538
20	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	6/12/2009	6/17/2009	S	GEMAX	GOLDMAN SACHS	Diversified Emerging Mkts	11.59	150.538
21	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	2/10/2010	2/16/2010	B	GHAAX	VAN ECK GLOBAL	Natural Resources	41.72	412.272
22	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	6/21/2010	6/24/2010	S	GHAAX	VAN ECK GLOBAL	Natural Resources	40.19	412.272
23	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	11/5/2007	11/8/2007	S	GHAAX	VAN ECK GLOBAL	Natural Resources	53.34	448.185
24	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	5/7/2009	5/12/2009	B	IGNAX	IVY GLOBAL NATURAL	Natural Resources	15.11	129.054
25	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	5/17/2010	5/20/2010	S	IGNAX	IVY GLOBAL NATURAL	Natural Resources	16.64	129.054
26	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	2/19/2010	2/24/2010	B	IGNAX	IVY GLOBAL NATURAL	Natural Resources	19.18	531.804
27	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	7/13/2010	7/16/2010	S	IGNAX	IVY GLOBAL NATURAL	Natural Resources	16.27	531.804

ST TRADING CHART
EXHIBIT A

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
28	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	9/21/2007	9/24/2007	S	IGNAX	IVY GLOBAL NATURAL	Natural Resources	39.96	744.157
29	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	5/14/2009	5/19/2009	B	IGNAX	IVY GLOBAL NATURAL	Natural Resources	15.21	930.309
30	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	10/13/2009	10/16/2009	S	IGNAX	IVY GLOBAL NATURAL	Natural Resources	18.02	931.265
31	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	4/21/2009	4/24/2009	B	IGNAX	IVY GLOBAL NATURAL	Natural Resources	12.91	1226.956
32	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	9/8/2009	9/11/2009	S	IGNAX	IVY GLOBAL NATURAL	Natural Resources	16.33	1226
33	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	1/23/2009	1/28/2009	B	INIVX	VAN ECK INTERNATN'L	Equity Precious Metals	12.88	178.571
34	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	6/12/2009	6/17/2009	S	INIVX	VAN ECK INTERNATN'L	Equity Precious Metals	15.05	178.571
35	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	2/26/2008	2/29/2008	B	INIVX	VAN ECK INTERNATN'L	Equity Precious Metals	21.92	812.044
36	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	11/7/2008	11/13/2008	S	INIVX	VAN ECK INTERNATN'L	Equity Precious Metals	8.68	812.044

ST TRADING CHART
EXHIBIT A

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
37	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	2/26/2008	2/29/2008	B	ISCAX	FEDERATED INTERNAT'L	Foreign Small/Mid Growth	46.31	841.611
38	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	11/11/2008	11/14/2008	S	ISCAX	FEDERATED INTERNAT'L	Foreign Small/Mid Growth	21.24	841.611
39	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	5/16/2008	5/19/2008	B	IVIAX	IVY INTERNATIONAL	Foreign Large Blend	19.56	1027.607
40	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	11/17/2008	11/18/2008	S	IVIAX	IVY INTERNATIONAL	Foreign Large Blend	9.71	1027.607
41	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	4/23/2010	4/28/2010	B	JLTAX	JP MORGAN LATIN	Latin America Stock	19.76	212.551
42	XXX1012	ST	JP TURNER	LEONARD GOLDBERG	8/23/2010	8/26/2010	S	JLTAX	JP MORGAN LATIN	Latin America Stock	18.43	212.551
43	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	4/21/2009	4/24/2009	B	JLTAX	JP MORGAN LATIN	Latin America Stock	10.23	674.487
44	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	9/14/2009	9/17/2009	S	JLTAX	JP MORGAN LATIN	Latin America Stock	15.01	674.487
45	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	7/14/2010	7/19/2010	B	LAUAX	COLUMBIA ACORN USA	Small Growth	23.62	364.098

ST TRADING CHART
EXHIBIT A

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
46	XXX3736	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	7/19/2011	7/22/2011	S	LAUAX	COLUMBIA ACORN USA	Small Growth	30.01	364.098
47	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	4/21/2009	4/24/2009	B	MDLTX	BLACKROCK LATIN	Latin America Stock	36.55	642.955
48	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	8/19/2009	8/24/2009	S	MDLTX	BLACKROCK LATIN	Latin America Stock	51.24	642.955
49	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	1/14/2011	1/20/2011	B	MTCAX	MFS TECHNOLOGY FUND A	Technology	16.23	1669.747
50	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	7/14/2011	7/19/2011	S	MTCAX	MFS TECHNOLOGY FUND A	Technology	14.98	1669.747
51	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	8/14/2009	8/19/2009	B	MTCAX	MFS TECHNOLOGY CLASS	Technology	11.53	685.169
52	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	1/14/2010	1/20/2010	S	MTCAX	MFS TECHNOLOGY CLASS	Technology	12.48	685.169
53	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	8/11/2009	8/14/2009	B	MTCAX	MFS TECHNOLOGY CLASS	Technology	11.37	839.93
54	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	1/12/2010	1/15/2010	S	MTCAX	MFS TECHNOLOGY CLASS	Technology	12.29	839.93

ST TRADING CHART
EXHIBIT A

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
55	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	10/14/2009	10/19/2009	B	MTCAX	MFS TECHNOLOGY CLASS	Technology	12.99	1291.763
56	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	2/17/2010	2/22/2010	S	MTCAX	MFS TECHNOLOGY CLASS	Technology	11.94	1291.763
57	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	6/22/2010	6/25/2010	B	NECAX	ING EMERGING COUNTRIES	Diversified Emerging Mkts	26.66	900.225
58	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	1/13/2011	1/19/2011	S	NECAX	ING EMERGING COUNTRIES	Diversified Emerging Mkts	30.13	900.225
59	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	10/23/2007	10/26/2007	S	NTKLX	ING INTERNATIONAL	Diversified Emerging Mkts	64.63	338.386
60	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	10/22/2007	10/25/2007	S	NTKLX	ING INTERNATIONAL	Foreign Small/Mid Value	63.39	379.278
61	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	9/9/2009	9/14/2009	B	PASMX	PACIFIC ADVISORS	Small Blend	27.51	727.008
62	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	2/9/2010	2/12/2010	S	PASMX	PACIFIC ADVISORS	Small Blend	24.23	727.008
63	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	12/4/2007	12/7/2007	S	PEUGX	PUTNAM EUROPE EQUITY	Europe Stock	32.35	148.607

ST TRADING CHART
EXHIBIT A

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
64	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	9/5/2007	9/10/2007	S	PEUGX	PUTNAM EUROPE EQUITY	Europe Stock	31.82	1179.567
65	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	11/18/2008	11/21/2008	B	PGNAX	JENNISON NATURAL	Natural Resources	26.84	422.876
66	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	5/13/2009	5/18/2009	S	PGNAX	JENNISON NATURAL	Natural Resources	33.58	422.876
67	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	9/6/2007	9/11/2007	B	PGNAX	JENNISON NATURAL	Natural Resources	57.96	648.723
68	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	2/25/2008	2/28/2008	S	PGNAX	JENNISON NATURAL	Natural Resources	62.33	648.723
69	XXX3736	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	12/13/2010	12/16/2010	S	PVOYX	PUTNAM VOYAGER FUND A	Large Growth	23.5	451.58
70	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	5/18/2010	5/21/2010	B	PVOYX	PUTNAM VOYAGER	Large Growth	21.42	480.859
71	XXX3116	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	12/14/2010	12/17/2010	S	PVOYX	PUTNAM VOYAGER FUND A	Large Growth	23.45	480.859
72	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	3/18/2010	3/23/2010	S	PVOYX	PUTNAM VOYAGER	Large Growth	21.09	238.265

ST TRADING CHART
EXHIBIT A

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
73	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	5/17/2010	5/20/2010	B	PVOYX	PUTNAM VOYAGER	Large Growth	21.78	449.954
74	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	7/14/2010	7/19/2010	S	PVOYX	PUTNAM VOYAGER	Large Growth	19.83	499.205
75	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	2/18/2010	2/23/2010	B	PVOYX	PUTNAM VOYAGER	Large Growth	20.95	737.47
76	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	6/24/2011	6/29/2011	B	SBMAX	LEGG MASON MID CAP	Mid-Cap Blend	23.28	77.32
77	XXX8693	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	2/28/2012	3/2/2012	S	SBMAX	LEGG MASON MID CAP	Mid-Cap Blend	23.29	77.32
78	XXX3116	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	6/24/2011	6/29/2011	B	SBMAX	LEGG MASON MID CAP	Mid-Cap Blend	23.28	243.127
79	XXX8706	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	2/28/2012	3/2/2012	S	SBMAX	LEGG MASON MID CAP	Mid-Cap Blend	23.29	243.127
80	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	12/10/2009	12/15/2009	B	SERAX	DWS EUROPE EQUITY	World Stock	24.56	187.296
81	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	4/22/2010	4/27/2010	S	SERAX	DWS EUROPE EQUITY	World Stock	22.72	187.296

ST TRADING CHART
EXHIBIT A

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
82	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	8/20/2009	8/25/2009	B	SHGAX	SELIGMAN GLOBAL	World Stock	11.45	2873.362
83	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	1/19/2010	1/22/2010	S	SHGAX	SELIGMAN GLOBAL	World Stock	12.07	2873.362
84	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	5/20/2008	5/23/2008	B	SILAX	WELLS FARGO INTERNTL	Foreign Large Blend	17.37	961.428
85	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	2/11/2009	2/17/2009	S	SILAX	WELLS FARGO INTERNTL	Foreign Large Blend	6.94	961.428
86	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	5/22/2008	5/28/2008	B	SILAX	WELLS FARGO INTERNTL	Foreign Large Blend	17.34	971.742
87	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	2/11/2009	2/17/2009	S	SILAX	WELLS FARGO INTERNTL	Foreign Large Blend	6.94	1170.633
88	XXX3116	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	12/15/2010	12/20/2010	B	SLANX	DWS LATIN AMERICA	Latin America Stock	57.6	194.444
89	XXX3116	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	5/17/2011	5/20/2011	S	SLANX	DWS LATIN AMERICA	Latin America Stock	48.72	194.444
90	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	1/25/2011	1/28/2011	B	SLANX	DWS LATIN AMERICA	Latin America Stock	54.83	553.529

ST TRADING CHART
EXHIBIT A

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
91	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	5/23/2011	5/26/2011	S	SLANX	DWS LATIN AMERICA	Latin America Stock	47.96	553.529
92	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	11/10/2008	11/14/2008	B	SLANX	DWS LATIN AMERICA	Latin America Stock	34.33	203.903
93	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	4/20/2009	4/23/2009	S	SLANX	DWS LATIN AMERICA	Latin America Stock	29.82	232.654
94	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	9/24/2007	9/27/2007	B	SLANX	DWS LATIN AMERICA	Latin America Stock	80.48	369.036
95	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	2/25/2008	2/28/2008	S	SLANX	DWS LATIN AMERICA	Latin America Stock	73.02	369.036
96	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	11/18/2008	11/21/2008	B	SLANX	DWS LATIN AMERICA	Latin America Stock	30.3	1155.116
97	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	4/20/2009	4/23/2009	S	SLANX	DWS LATIN AMERICA	Latin America Stock	29.82	1155.116
98	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	1/15/2010	1/21/2010	B	SMCWX	AMERICAN SMALL CAP	World Stock	34.56	248.843
99	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	5/17/2010	5/20/2010	S	SMCWX	AMERICAN SMALL CAP	World Stock	32.81	248.843

ST TRADING CHART
EXHIBIT A

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
100	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	1/13/2010	1/19/2010	B	SMCWX	AMERICAN SMALL CAP	World Stock	34.67	297.087
101	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	5/14/2010	5/19/2010	S	SMCWX	AMERICAN SMALL CAP	World Stock	32.99	297.087
102	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	10/24/2007	10/29/2007	B	SMCWX	AMERICAN SMALL CAP	World Stock	51.11	432.401
103	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	5/19/2008	5/22/2008	S	SMCWX	AMERICAN SMALL CAP	World Stock	38.64	432.401
104	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	2/26/2008	2/29/2008	B	TEDMX	TEMPLETON DEVELOPING	Diversified Emerging Mkts	30.32	1285.455
105	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	11/11/2008	11/14/2008	S	TEDMX	TEMPLETON DEVELOPING	Diversified Emerging Mkts	13.64	1285.455
106	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	4/16/2008	4/21/2008	B	TGVFX	TOUCHSTONE GROWTH	Large Growth	24.58	126.119
107	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	5/6/2009	5/11/2009	S	TGVFX	TOUCHSTONE GROWTH	Large Growth	15.67	126.119
108	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	9/17/2007	9/20/2007	S	TGVFX	TOUCHSTONE GROWTH	Large Growth	22.96	933.522

ST TRADING CHART
EXHIBIT A

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
109	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	2/12/2009	2/18/2009	B	VTFAX	VAN KAMPEN	Technology	3.68	1807.065
110	XXX4980	ST	JP TURNER	LEONARD GOLDBERG	8/13/2009	8/18/2009	S	VTFAX	VAN KAMPEN	Technology	4.4	1807.065
111	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	2/12/2009	2/18/2009	B	VTFAX	VAN KAMPEN	Technology	3.68	2214.674
112	XXX6460	ST	JP TURNER	LEONARD GOLDBERG	8/10/2009	8/13/2009	S	VTFAX	VAN KAMPEN	Technology	4.33	2214.674
113	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	7/14/2011	7/19/2011	S	WFMCX	WELLS FARGO MID CAP	Mid-Cap Growth	6.2	1858.06
114	XXX6842	ST	JP TURNER	LEONARD GOLDBERG	7/15/2010	7/20/2010	B	WFMCX	WELLS FARGO MID CAP	Mid-Cap Growth	5.33	1857.411
115	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	10/11/2011	10/14/2011	B	DIA	SPDR DOW JONES INDUSTRIAL AVER	Large Value	114.12	208
116	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	11/22/2011	11/28/2011	S	DIA	SPDR DOW JONES INDUSTRIAL AVER	Large Value	115.04	208
117	XXX3736	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	7/18/2011	7/21/2011	B	IJT	ISHARES S&P SMALL CAP 600	Small Growth	79.439	119

ST TRADING CHART
EXHIBIT A

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
118	XXX8765	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	4/16/2012	4/19/2012	S	IJT	ISHARES S&P SMALL CAP 600	Small Growth	80.128	119
119	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	7/18/2011	7/21/2011	B	IJT	ISHARES S&P SMALL CAP 600	Small Growth	79.429	223
120	XXX8693	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	4/16/2012	4/19/2012	S	IJT	ISHARES S&P SMALL CAP 600	Small Growth	80.12	223
121	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	11/22/2011	11/28/2011	B	IWM	ISHARES RUSSELL 2000	Small Blend	70.51	323
122	XXX8765	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	4/3/2012	4/9/2012	B	IWY	ISHARES RUSSELL TOP 200 GROWTH	Large Growth	35.34	301
123	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	5/24/2011	5/27/2011	B	JKE	ISHARES MORNING LG GR IN	Large Growth	67.084	386
124	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	10/11/2011	10/14/2011	S	JKE	ISHARES MORNING LG GR IN	Large Growth	64.65	30
125	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	10/11/2011	10/14/2011	S	JKE	ISHARES MORNING LG GR IN	Large Growth	64.591	156
126	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	10/11/2011	10/14/2011	S	JKE	ISHARES MORNING LG GR IN	Large Growth	64.591	200

ST TRADING CHART
EXHIBIT A

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
127	XXX8706	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	4/3/2012	4/9/2012	B	KRE	SPDR SER TR	Financial	28.379	470
128	XXX3736	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	7/20/2011	7/25/2011	B	SPY	SPDR S&P 500 ETF TRUST	Large Blend	132.94	80
129	XXX8765	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	4/3/2012	4/9/2012	S	SPY	SPDR S&P 500 ETF TRUST	Large Blend	140.91	80
130	XXX3116	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	5/18/2011	5/23/2011	B	SPY	SPDR S&P 500 ETF TRUST	Large Blend	134.03	100
131	XXX8706	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	4/3/2012	4/9/2012	S	SPY	SPDR S&P 500 ETF TRUST	Large Blend	140.94	100
132	XXX2985	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	7/18/2011	7/21/2011	B	SPY	SPDR S&P 500 ETF TRUST	Large Blend	130.21	136
133	XXX8693	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	4/3/2012	4/9/2012	S	SPY	SPDR S&P 500 ETF TRUST	Large Blend	140.89	136
134	XXX8693	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	4/16/2012	4/19/2012	B	XLF	SELECT SECTOR SPDR TRUST	Financial	15.26	1110
135	XXX8765	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	4/16/2012	4/19/2012	B	XLI	SELECT SECTOR SPDR TRUST	Industrials	36.54	246

ST TRADING CHART
EXHIBIT A

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
136	XXX8693	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	4/3/2012	4/9/2012	B	XLK	SELECT SECTOR SPDR TRUST	Technology	30.37	598
137	XXX8693	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	2/29/2012	3/5/2012	B	XRT	SPDR SER TR	Consumer Cyclical	59.25	38
138	XXX8706	ST	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	2/29/2012	3/5/2012	B	XRT	SPDR SER TR	Consumer Cyclical	59.2	94

Exhibit B

Exhibit B

Forged or Falsified New Account Documents

	Customer	Account Number	Firm	Type Of Account	Inaccurate Information
1	LR	xxx3881	JP Turner	IRA Distribution Account	False Investment Objectives; Signature Forged
2	LR	xxx3868	Newport	IRA	False Investment Objectives; Signature Forged
3	ST	xxx3116 - New xxx8706	Newport	Rollover IRA	False Investment Objectives; Signature Forged
4	ST	xxx2985 - New xxx8693	Newport	IRA	False Investment Objectives; Signature Forged
5	NB	xxx5016	Newport	Rollover IRA	Incorrect Address; Signature Forged
6	NB	xxx5137	Newport	Rollover IRA	Incorrect Address; Signature Forged
7	RB	xxx5129	Newport	Rollover IRA	Incorrect Address; Signature Forged
8	JK	xxx2738	Newport	Rollover IRA	Investment Objective listed as "Short term growth with high risk," and Long term growth with greater risk-Aggressive; Signatures forged
9	JK	xxx2704	Newport	Family Trust	Investment Objective listed as "Short term growth with high risk," and Long term growth with greater risk-Aggressive; Signatures forged
10	LM	xxx5111 - New xxx8863	Newport		Investment Objective listed as Short Term Growth with high risk, Speculative, and Capital Appreciation-High Risk; Net Worth and Liquid cash over $500,000; Signature Forged
11	LM	xxx5095 - New xxx8861	Newport	Rollover IRA	Investment Objective listed as Short Term Growth with high risk, Speculative, and Capital Appreciation-High Risk; Net Worth and Liquid cash over $500,000; Signature Forged
12	LM	xxx5103 -New xxx8862	Newport	Roth IRA	Investment Objective listed as Short Term Growth with high risk, Speculative, and Capital Appreciation-High Risk; Net Worth and Liquid cash over $500,000; Signature Forged
13	JC	xxx5053 - New xxx8857	Newport	Rollover IRA	Investment Objectives listed as Capital Appreciation with high risk and Long term growth with greater risk-Aggressive Growth; Signatures forged
14	LR	xxx8551 - New xxx1215	JP Turner	IRA	Net worth listed as over $500,000; Risk Tolerance listed as moderate and aggressive
15	LR	xxx3849 - New xxx1503	JP Turner	IRA	Net worth listed as over $500,000; Risk Tolerance listed as moderate and aggressive
16	JC	xxx6915 - New xxx1127	JP Turner	IRA	Risk Tolerance list as "moderate and aggressive"; Signature forged

Exhibit B

Forged or Falsified New Account Documents

	Customer	Account Number	Firm	Type Of Account	Inaccurate Information
17	LM	xxx8420 - New xxx1210	JP Turner	IRA	Risk Tolerance Listed as Moderate and Aggressive; Signature Forged
18	LM	xxx5273	JP Turner	Roth IRA	Risk Tolerance Listed as Moderate and Aggressive; Signature Forged
19	LM	xxx2270	JP Turner	Roth IRA	Signature Forged on Asset Transfer Form
20	LM	xxx0060	Newport	Roth IRA	Signature Forged
21	LM	xxx6053	Newport	Rollover IRA	Signature Forged
22	LR	xxx4163	Newport	Beneficiary IRA	Signature Forged
23	LR	xxx6425	Newport	Beneficiary	Signature Forged
24	ST	xxx4980	JP Turner	IRA	Signature Forged
25	ST	xxx6460	JP Turner	IRA	Signature Forged
26	JK	xxx8039 - New xxx1184	JP Turner	IRA	Signatures forged
27	JK	xxx7941- New xxx1673	JP Turner	Brokerage Account	Signatures forged

Exhibit C

Exhibit C
Switch Forms with Falsified Information and Signatures

	Customer	Firm	Account Number	Date of Switch Letter	Fund Sold	Fund Purchased	Value of Sale	Reason For Exchange	Switch Form Marked Solicited/Unsolicited
1	JC	Newport	xxx5053	2/17/2011	Van Eck Emerg. Mkts	DWS Latin America	$8,100.00	Wants Latin America feels other emerging mkts will slow down.	Unsolicited
2	ST	JP Turner	xxx6842	2/26/2008	Jennis Dryden Nat. Resources and DWS Latin	Templeton Developing Mkts and Federated Int'l Sm. Co	JP Turner form did not ask for amount	Afraid of commodities now! Likes Int'l and Dev. Mkt for near and long term.	JP Turner form did not request solicited/unsolicited
3	ST	JP Turner	xxx6842	5/16/2008	Evergreen Emerging Markets	Ivy Int'l Core Equity	JP Turner form did not ask for amount	Didn't experience good movement or any at all with Evergreen feels Ivy and Int'l better.	JP Turner form did not request solicited/unsolicited
4	ST	JP Turner	xxx6842	11/18/2008	Templeton Developing Markets and Federating Int'l and Ivy Int'l Core	DWS Latin America and Jennison Natural Resources	JP Turner form did not ask for amount	Wants Gold and Latin America. Is aware of new commission.	JP Turner form did not request solicited/unsolicited
5	ST	JP Turner	xxx6842	4/21/2009	DWS Latin America	Ivy Global Natural Resources and Blackrock Latin America	JP Turner form did not ask for amount	Tax loss. Likes commodities v. Latin American cos. Is aware of add'l sales charges	JP Turner form did not request solicited/unsolicited
6	ST	JP Turner	xxx6842	5/14/2009	Jennison Natural Resources	Ivy Natural Resources	JP Turner form did not ask for amount	Feels Jenn. Dryden didn't do well in sector. Feels Ivy will do better. Advised by someone (not me). Knows of new sales charge.	JP Turner form did not request solicited/unsolicited
7	ST	JP Turner	xxx6842	8/20/2009	Blackrock Latin America	Seligman Global Sm. Co	JP Turner form did not ask for amount	Feels Int'l sm. Cos. will out perform Latin America. Traditionally small cos do well in recovery. Investor aware of new commission.	JP Turner form did not request solicited/unsolicited
8	ST	JP Turner	xxx6842	10/14/2009	Ivy Global Nat Resources	MFS Tech A	JP Turner form did not ask for amount	Thinks tech sector next out performer! Aware of extra comm.	JP Turner form did not request solicited/unsolicited
9	ST	JP Turner	xxx6842	1/20/2010	Seligman Global	Delaware Emerging Markets	JP Turner form did not ask for amount	Some small caps out of favor! Emerg. Mkts to continue climb. Relayed to client re: new comm.	JP Turner form did not request solicited/unsolicited
10	ST	JP Turner	xxx6842	2/10/2010	Pacific Advisors Sm. Cap Gr.	Van eck Global Hard Assets	JP Turner form did not ask for amount	Profit taking!! Wants gold and nat. resources. Investor knows of new commission.	JP Turner form did not request solicited/unsolicited
11	ST	JP Turner	xxx6842	2/17/2010	MFS Technology	Putnam Voyager A	JP Turner form did not ask for amount	Wants aggress. growth. Tech seems played out. Client knows of add 'l comm.	JP Turner form did not request solicited/unsolicited
12	ST	JP Turner	xxx6842	6/22/2010	Delaware Emerging Mkts and InVan Eck Global Hard Assets	Franklin Natural Resources and Ing Emerg. Mkts	JP Turner form did not ask for amount	Was told by reliable other investor Franklin and Ing has best track records . Aware of add 'l sales charge	JP Turner form did not request solicited/unsolicited
13	ST	JP Turner	xxx6842	7/15/2010	Putnam Voyager	Wells Fargo Midcap Gr.	JP Turner form did not ask for amount	Felt Put. Voyager didn't live up to expectations. CNBC says mid caps safe in near term mkt 2-3 yrs. Aware of new comm.	JP Turner form did not request solicited/unsolicited
14	ST	Newport	xxx3736	12/14/2010	Putnam Voyager	Van Eck Emerg. Mkts A	$10,500.00	Wants more exposure to int'l growth in emerging mkt. areas	Unsolicited

Exhibit C

Switch Forms with Falsified Information and Signatures

	Customer	Firm	Account Number	Date of Switch Letter	Fund Sold	Fund Purchased	Value of Sale	Reason For Exchange	Switch Form Marked Solicited/Unsolicted
15	ST	Newport	xxxx3116	12/15/2010	Putnam Voyager	DWS Latin America	$11,200.00	Wants Brazil and South America.	Unsolicited
16	ST	Newport	xxxx2985	1/13/2011	ING Emerg Mkts	MFS Tech	$27,200.00	Wants tech feels emerg. mkts might be over for now! But not South America. Still to grow.	Unsolicited
17	ST	Newport	xxxx2985	1/24/2011	Franklin Nat. Res.	DWS Latin America	$30,400.00	Taking profit and wants South America Investments.	Unsolicited
18	JK	Newport	xxxx2738	2/4/2011	Columbia Acorn	DWS Latin America	$14,400.00	Wants Latin America feels it will outperform USA. Knows of add'l sales charge.	Unsolicited
19	JK	Newport	xxxx2704	2/4/2011	Columbia Acorn	DWS Latin America	$12,150.00	Wants Latin America, feels USA will grow slower w/ Rep. congress	Unsolicited
20	LR	Newport	xxxx4163	12/22/2010	Temp. Emerg. Mkts A	DWS Latin Amer. A	$10,110.00	Feels world emerg. Mkts a little overdone. Wants Brazil and oil funds is future	Unsolicited

Exhibit D

JC TRADING CHART
EXHIBIT D

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
1	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	10/14/2008	10/17/2008	B	DGRAX	MORGAN STANLEY	Mid-Cap Growth	21.21	292.315
2	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	4/14/2009	4/17/2009	S	DGRAX	MORGAN STANLEY	Mid-Cap Growth	16.83	292.315
3	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	4/27/2010	4/30/2010	B	ETGIX	EATON VANCE GREATER	India Equity	25.95	119.461
4	XXX1127	JC	JP TURNER	LEONARD GOLDBERG	9/16/2010	9/21/2010	S	ETGIX	EATON VANCE GREATER INDIA	India Equity	26.7	119.461
5	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	4/25/2008	4/30/2008	B	ETGIX	EATON VANCE GREATER	India Equity	28.65	164.049
6	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	11/14/2008	11/19/2008	S	ETGIX	EATON VANCE GREATER	India Equity	11.39	164.049
7	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	9/11/2007	9/14/2007	S	ETGIX	EATON VANCE GREATER	India Equity	30.32	239.29
8	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	6/17/2010	6/22/2010	B	GBFAX	VAN ECK EMERGING MARKETS	Diversified Emerging Mkts	11.31	632.184

JC TRADING CHART
EXHIBIT D

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
9	XXX5053	JC	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	2/11/2011	2/15/2011	S	GBFAX	VAN ECK EMERGING MARKETS	Diversified Emerging Mkts	12.97	632.184
10	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	10/22/2007	10/25/2007	S	GEMAX	GOLDMAN SACHS	Diversified Emerging Mkts	30.34	188.822
11	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	2/22/2008	2/27/2008	B	GEMAX	GOLDMAN SACHS	Diversified Emerging Mkts	25.95	448.94
12	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	10/13/2008	10/16/2008	S	GEMAX	GOLDMAN SACHS	Diversified Emerging Mkts	13.7	448.94
13	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	2/11/2010	2/17/2010	B	IGNAX	IVY GLOBAL NATURAL	Natural Resources	18.58	427.879
14	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	6/16/2010	6/21/2010	S	IGNAX	IVY GLOBAL NATURAL	Natural Resources	16.79	427.879
15	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	4/15/2009	4/20/2009	B	IHSAX	HARTFORD SMALL	Small Growth	12.14	518.946
16	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	9/9/2009	9/14/2009	S	IHSAX	HARTFORD SMALL	Small Growth	14.46	518.946

JC TRADING CHART
EXHIBIT D

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
17	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	9/10/2009	9/15/2009	B	MDLTX	BLACKROCK LATIN	Latin America Stock	56.9	132.865
18	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	2/10/2010	2/16/2010	S	MDLTX	BLACKROCK LATIN	Latin America Stock	57.55	132.865
19	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	9/12/2007	9/17/2007	B	MDLTX	BLACKROCK LATIN	Latin America Stock	70.6	141.643
20	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	2/21/2008	2/26/2008	S	MDLTX	BLACKROCK LATIN	Latin America Stock	65.72	141.643
21	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	12/14/2009	12/17/2009	B	MTCAX	MFS TECHNOLOGY CLASS	Technology	12.58	222.576
22	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	4/26/2010	4/29/2010	S	MTCAX	MFS TECHNOLOGY CLASS	Technology	13.33	222.576
23	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	7/10/2009	7/15/2009	B	PGNAX	JENNISON NATURAL	Natural Resources	34.01	67.039
24	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	12/11/2009	12/16/2009	S	PGNAX	JENNISON NATURAL	Natural Resources	42.94	67.039

JC TRADING CHART
EXHIBIT D

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
25	XXX1127	JC	JP TURNER	LEONARD GOLDBERG	9/17/2010	9/22/2010	B	PVOYX	PUTNAM VOYAGER FUND A	Large Growth	22.12	149.186
26	XXX5053	JC	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	6/6/2011	6/9/2011	S	PVOYX	PUTNAM VOYAGER FUND A	Large Growth	22.85999	149.186
27	XXX5053	JC	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	2/17/2011	2/23/2011	B	SLANX	DWS LATIN AMERICA	Latin America Stock	54.54986	148.488
28	XXX5053	JC	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	6/6/2011	6/9/2011	S	SLANX	DWS LATIN AMERICA	Latin America Stock	48.81001	148.488
29	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	11/17/2008	11/20/2008	B	SLANX	DWS LATIN AMERICA	Latin America Stock	30.77	60.123
30	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	7/6/2009	7/9/2009	S	SLANX	DWS LATIN AMERICA	Latin America Stock	36.24	60.123
31	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	10/23/2007	10/26/2007	B	VGRAX	VAN KAMPEN MID CAP	Mid-Cap Growth	35.12	170.843
32	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	4/24/2008	4/29/2008	S	VGRAX	VAN KAMPEN MID CAP	Mid-Cap Growth	26.85	170.843

JC TRADING CHART
EXHIBIT D

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
33	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	7/22/2008	7/25/2008	B	WFAAX	WELLS FARGO ADV	Diversified Pacific/Asia	11.28	115.248
34	XXX6915	JC	JP TURNER	LEONARD GOLDBERG	4/14/2009	4/17/2009	S	WFAAX	WELLS FARGO ADV	Diversified Pacific/Asia	6.54	115.248
35	XXX5053	JC	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	10/6/2011	10/12/2011	B	DIA	SPDR DOW JONES INDUSTRIAL AVER	Large Value	109.3	46
36	XXX5053	JC	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	11/21/2011	11/25/2011	S	DIA	SPDR DOW JONES INDUSTRIAL AVER	Large Value	114.87	46
37	XXX5053	JC	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	6/7/2011	6/10/2011	B	IJT	ISHARES TRUST S&P SC600 GR	Small Growth	78.07	74
38	XXX5053	JC	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	6/7/2011	6/10/2011	B	JKE	ISHARES MORNING LG GR IN	Large Growth	66.57	86
39	XXX5053	JC	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	10/5/2011	10/11/2011	S	JKE	ISHARES MORNING LG GR IN	Large Growth	61.1	86
40	XXX5053	JC	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	11/21/2011	11/25/2011	B	XRT	S&P RETAIL ETF	Consumer Cyclical	50.4	98

Exhibit E

JK TRADING CHART
EXHIBIT E

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
1	XXX7941	JK	JP TURNER	LEONARD GOLDBERG	1/25/2008	1/30/2008	B	ETGIX	EATON VANCE GREATER	India Equity	33.27	259.994
2	XXX7941	JK	JP TURNER	LEONARD GOLDBERG	9/12/2008	9/17/2008	S	ETGIX	EATON VANCE GREATER	India Equity	19.15	259.994
3	XXX8039	JK	JP TURNER	LEONARD GOLDBERG	1/22/2008	1/25/2008	B	ETGIX	EATON VANCE GREATER	India Equity	31.61	732.363
4	XXX8039	JK	JP TURNER	LEONARD GOLDBERG	9/15/2008	9/18/2008	S	ETGIX	EATON VANCE GREATER	India Equity	18.2	732.363
5	XXX8039	JK	JP TURNER	LEONARD GOLDBERG	2/16/2010	2/19/2010	B	GHAAX	VAN ECK GLOBAL	Natural Resources	43.81	277.334
6	XXX8039	JK	JP TURNER	LEONARD GOLDBERG	7/16/2010	7/21/2010	S	GHAAX	VAN ECK GLOBAL	Natural Resources	37.05	277.334
7	XXX8039	JK	JP TURNER	LEONARD GOLDBERG	4/16/2009	4/21/2009	B	GHAAX	VAN ECK GLOBAL	Natural Resources	31.3	298.722
8	XXX8039	JK	JP TURNER	LEONARD GOLDBERG	9/11/2009	9/16/2009	S	GHAAX	VAN ECK GLOBAL	Natural Resources	38.6	298.722
9	XXX8039	JK	JP TURNER	LEONARD GOLDBERG	9/14/2009	9/17/2009	B	IGNAX	IVY GLOBAL NATURAL	Natural Resources	17.91	642.099

JK TRADING CHART
EXHIBIT E

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
10	XXX8039	JK	JP TURNER	LEONARD GOLDBERG	2/12/2010	2/18/2010	S	IGNAX	IVY GLOBAL NATURAL	Natural Resources	17.37	642.099
11	XXX7941	JK	JP TURNER	LEONARD GOLDBERG	12/22/2008	12/26/2008	B	INIVX	VAN ECK INTERNATN'L	Equity Precious Metals	11.35	704.846
12	XXX7941	JK	JP TURNER	LEONARD GOLDBERG	5/19/2009	5/22/2009	S	INIVX	VAN ECK INTERNATN'L	Equity Precious Metals	14.3	704.846
13	XXX7941	JK	JP TURNER	LEONARD GOLDBERG	7/26/2010	7/29/2010	B	LAUAX	COLUMBIA ACORN USA	Small Growth	24.66	433.901
14	XXX2704	JK	NEWPORT COAST	LEONARD GOLDBERG	2/3/2011	2/8/2011	S	LAUAX	COLUMBIA ACORN USA FUND A	Small Growth	28.13	433.901
15	XXX8039	JK	JP TURNER	LEONARD GOLDBERG	7/19/2010	7/22/2010	B	LAUAX	COLUMBIA ACORN USA	Small Growth	22.74	514.512
16	XXX2738	JK	NEWPORT COAST	LEONARD GOLDBERG	2/3/2011	2/8/2011	S	LAUAX	COLUMBIA ACORN USA FUND A	Small Growth	28.13	514.512
17	XXX7941	JK	JP TURNER	LEONARD GOLDBERG	5/20/2009	5/26/2009	B	PGNAX	JENNISON NATURAL	Prudential Investments	38.11	266.072
18	XXX7941	JK	JP TURNER	LEONARD GOLDBERG	10/20/2009	10/23/2009	S	PGNAX	JENNISON NATURAL	Prudential Investments	45.9	266.072

JK TRADING CHART
EXHIBIT E

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
19	XXX2704	JK	NEWPORT COAST	LEONARD GOLDBERG	2/4/2011	2/9/2011	B	SLANX	DWS LATIN AMERICA	Latin America Stock	53.2899	227.998
20	XXX2704	JK	NEWPORT COAST	LEONARD GOLDBERG	2/14/2011	2/17/2011	S	SLANX	DWS LATIN AMERICA	Latin America Stock	50.3795	44.661
21	XXX2704	JK	NEWPORT COAST	LEONARD GOLDBERG	7/25/2011	7/28/2011	S	SLANX	DWS LATIN AMERICA	Latin America Stock	49.3	183.337
22	XXX2738	JK	NEWPORT COAST	LEONARD GOLDBERG	2/22/2011	2/25/2011	B	SLANX	DWS LATIN AMERICA	Latin America Stock	53.1598	79.007
23	XXX2738	JK	NEWPORT COAST	LEONARD GOLDBERG	2/4/2011	2/9/2011	B	SLANX	DWS LATIN AMERICA	Latin America Stock	53.2899	270.22
24	XXX2738	JK	NEWPORT COAST	LEONARD GOLDBERG	7/25/2011	7/28/2011	S	SLANX	DWS LATIN AMERICA	Latin America Stock	49.3	349.227
25	XXX7941	JK	JP TURNER	LEONARD GOLDBERG	8/17/2007	8/22/2007	B	SLANX	DWS LATIN AMERICA	Latin America Stock	66.62	114.83
26	XXX7941	JK	JP TURNER	LEONARD GOLDBERG	1/24/2008	1/29/2008	S	SLANX	DWS LATIN AMERICA	Latin America Stock	63.73	114.83
27	XXX7941	JK	JP TURNER	LEONARD GOLDBERG	7/25/2008	7/30/2008	B	SLANX	DWS LATIN AMERICA	Latin America Stock	70.4	82.386

JK TRADING CHART
EXHIBIT E

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
28	XXX7941	JK	JP TURNER	LEONARD GOLDBERG	9/15/2008	9/18/2008	B	SLANX	DWS LATIN AMERICA	Latin America Stock	54.27	160.31
29	XXX7941	JK	JP TURNER	LEONARD GOLDBERG	12/19/2008	12/24/2008	S	SLANX	DWS LATIN AMERICA	Latin America Stock	31.11	242.696
30	XXX8039	JK	JP TURNER	LEONARD GOLDBERG	8/16/2007	8/21/2007	B	SLANX	DWS LATIN AMERICA	Latin America Stock	63.58	173.01
31	XXX7941	JK	JP TURNER	LEONARD GOLDBERG	10/21/2009	10/26/2009	B	SLANX	DWS LATIN AMERICA	Latin America Stock	54.21	224.682
32	XXX7941	JK	JP TURNER	LEONARD GOLDBERG	3/18/2010	3/23/2010	S	SLANX	DWS LATIN AMERICA	Latin America Stock	51.17	224.682
33	XXX8039	JK	JP TURNER	LEONARD GOLDBERG	9/16/2008	9/19/2008	B	SLANX	DWS LATIN AMERICA	Latin America Stock	55.13	268.456
34	XXX8039	JK	JP TURNER	LEONARD GOLDBERG	4/15/2009	4/20/2009	S	SLANX	DWS LATIN AMERICA	Latin America Stock	31.13	268.456
35	XXX8039	JK	JP TURNER	LEONARD GOLDBERG	1/18/2008	1/24/2008	S	SLANX	DWS LATIN AMERICA	Latin America Stock	62.42	285.693
36	XXX7941	JK	JP TURNER	LEONARD GOLDBERG	3/19/2010	3/24/2010	B	TEMGX	TEMPLETON GLOBAL	World Stock	6.68	1751.497

JK TRADING CHART

EXHIBIT E

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
37	XXX7941	JK	JP TURNER	LEONARD GOLDBERG	7/23/2010	7/28/2010	S	TEMGX	TEMPLETON GLOBAL	World Stock	6.1	1751.497
38	XXX2704	JK	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	7/26/2011	7/29/2011	B	IJT	ISHARES TRUST S&P SC600 GR	Small Growth	80.429	135
39	XXX2738	JK	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	7/26/2011	7/29/2011	B	JKE	ISHARES MORNING LG GR IN	Large Growth	70.979	246

Exhibit F

LR TRADING CHART
EXHIBIT F

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
1	XXX3881	LR	JP TURNER	LEONARD GOLDBERG	11/19/2007	11/23/2007	S	EMGAX	EVERGREEN EMERG MKTS	Diversified Emerging Mkts	27.76	593.589
2	XXX3849	LR	JP TURNER	LEONARD GOLDBERG	4/9/2009	4/15/2009	B	ETGIX	EATON VANCE GREATER	India Equity	13.69	182.615
3	XXX3849	LR	JP TURNER	LEONARD GOLDBERG	3/12/2010	3/17/2010	S	ETGIX	EATON VANCE GREATER	India Equity	23.51	182.615
4	XXX3849	LR	JP TURNER	LEONARD GOLDBERG	9/17/2007	9/20/2007	B	ETGIX	EATON VANCE GREATER	India Equity	32.11	222.672
5	XXX8551	LR	JP TURNER	LEONARD GOLDBERG	10/12/2009	10/15/2009	B	ETGIX	EATON VANCE GREATER	India Equity	23.86	236.798
6	XXX8551	LR	JP TURNER	LEONARD GOLDBERG	2/19/2010	2/24/2010	S	ETGIX	EATON VANCE GREATER	India Equity	22.09	236.798
7	XXX3849	LR	JP TURNER	LEONARD GOLDBERG	5/14/2008	5/19/2008	S	ETGIX	EATON VANCE GREATER	India Equity	25.24	253.37
8	XXX3881	LR	JP TURNER	LEONARD GOLDBERG	11/21/2007	11/27/2007	B	ETGIX	EATON VANCE GREATER	India Equity	38.13	854.97

LR TRADING CHART
EXHIBIT F

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
9	XXX3881	LR	JP TURNER	LEONARD GOLDBERG	5/22/2008	5/28/2008	S	ETGIX	EATON VANCE GREATER	India Equity	24.91	972.839
10	XXX3849	LR	JP TURNER	LEONARD GOLDBERG	9/14/2007	9/19/2007	S	GEMAX	GOLDMAN SACHS	Diversified Emerging Mkts	27.13	265.079
11	XXX8551	LR	JP TURNER	LEONARD GOLDBERG	2/22/2010	2/25/2010	B	GHAAX	VAN ECK GLOBAL	Natural Resources	43.88	116.226
12	XXX8551	LR	JP TURNER	LEONARD GOLDBERG	7/16/2010	7/21/2010	S	GHAAX	VAN ECK GLOBAL	Natural Resources	37.05	116.226
13	XXX3881	LR	JP TURNER	LEONARD GOLDBERG	11/24/2008	11/28/2008	B	LAIAX	COLUMBIA ACORN	Foreign Small/Mid Growth	21.89	332.115
14	XXX3881	LR	JP TURNER	LEONARD GOLDBERG	5/14/2009	5/19/2009	S	LAIAX	COLUMBIA ACORN	Foreign Small/Mid Growth	25.39	332.115
15	XXX3849	LR	JP TURNER	LEONARD GOLDBERG	7/20/2010	7/23/2010	B	LAUAX	COLUMBIA ACORN USA	Small Growth	23.12	160.035
16	XXX8551	LR	JP TURNER	LEONARD GOLDBERG	7/19/2010	7/22/2010	B	LAUAX	COLUMBIA ACORN USA	Small Growth	22.74	189.094

LR TRADING CHART
EXHIBIT F

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
17	XXX3881	LR	JP TURNER	LEONARD GOLDBERG	10/23/2009	10/28/2009	B	MTCAX	MFS TECHNOLOGY CLASS	Technology	12.75	745.098
18	XXX3881	LR	JP TURNER	LEONARD GOLDBERG	3/17/2010	3/22/2010	S	MTCAX	MFS TECHNOLOGY CLASS	Technology	12.51	745.098
19	XXX3849	LR	JP TURNER	LEONARD GOLDBERG	3/15/2010	3/18/2010	B	PVOYX	PUTNAM VOYAGER	Large Growth	22.12	192.134
20	XXX3849	LR	JP TURNER	LEONARD GOLDBERG	7/19/2010	7/22/2010	S	PVOYX	PUTNAM VOYAGER	Large Growth	19.29	192.134
21	XXX4163	LR	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	12/22/2010	12/28/2010	B	SLANX	DWS LATIN AMERICA	Latin America Stock	58.6899	170.387
22	XXX3849	LR	JP TURNER	LEONARD GOLDBERG	5/15/2008	5/20/2008	B	SLANX	DWS LATIN AMERICA	Latin America Stock	85.89	74.514
23	XXX3849	LR	JP TURNER	LEONARD GOLDBERG	4/8/2009	4/14/2009	S	SLANX	DWS LATIN AMERICA	Latin America Stock	30.07	85.021
24	XXX3881	LR	JP TURNER	LEONARD GOLDBERG	5/23/2008	5/29/2008	B	SLANX	DWS LATIN AMERICA	Latin America Stock	86.07	282.328

LR TRADING CHART
EXHIBIT F

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
25	XXX3881	LR	JP TURNER	LEONARD GOLDBERG	11/21/2008	11/26/2008	S	SLANX	DWS LATIN AMERICA	Latin America Stock	25.86	282.328
26	XXX8551	LR	JP TURNER	LEONARD GOLDBERG	10/9/2009	10/15/2009	S	SMCAX	DWS MID CAP GROWTH	Mid-Cap Growth	10.69	332.633
27	XXX3881	LR	JP TURNER	LEONARD GOLDBERG	3/18/2010	3/23/2010	B	TEMMX	TEMPLETON EMERGING	Diversified Emerging Mkts	11.14	834.829
28	XXX4163	LR	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	12/21/2010	12/27/2010	S	TEMMX	TEMPLETON EMERGING MKT	Diversified Emerging Mkts	12.15	834.829
29	XXX3881	LR	JP TURNER	LEONARD GOLDBERG	5/18/2009	5/21/2009	B	VTFAX	VAN KAMPEN	Technology	4.13	2029.056
30	XXX3881	LR	JP TURNER	LEONARD GOLDBERG	10/22/2009	10/27/2009	S	VTFAX	VAN KAMPEN	Technology	4.72	2029.056

Exhibit G

LM TRADING CHART
EXHIBIT G

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
1	XXX8420	LM	JP TURNER	LEONARD GOLDBERG	4/26/2010	4/29/2010	B	ETGIX	EATON VANCE GREATER	India Equity	26.34	53.151
2	XXX1210	LM	JP TURNER	LEONARD GOLDBERG	9/16/2010	9/21/2010	S	ETGIX	EATON VANCE GREATER	India Equity	26.7	53.151
3	XXX8420	LM	JP TURNER	LEONARD GOLDBERG	7/10/2009	7/15/2009	B	ETGIX	EATON VANCE GREATER	India Equity	17.97	61.213
4	XXX8420	LM	JP TURNER	LEONARD GOLDBERG	12/11/2009	12/16/2009	S	ETGIX	EATON VANCE GREATER	India Equity	23.04	61.213
5	XXX8420	LM	JP TURNER	LEONARD GOLDBERG	4/16/2008	4/21/2008	B	ETGIX	EATON VANCE GREATER	India Equity	27.78	75.594
6	XXX8420	LM	JP TURNER	LEONARD GOLDBERG	11/17/2008	11/20/2008	S	ETGIX	EATON VANCE GREATER	India Equity	11.1	75.594
7	XXX5103	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	5/9/2011	5/12/2011	S	GBFAX	VAN ECK EMERGING MARKETS	Diversified Emerging Mkts	13.66998	165.374
8	XXX1119	LM	JP TURNER	LEONARD GOLDBERG	9/16/2010	9/21/2010	S	GBFAX	VAN ECK EMERGING MARKETS	Diversified Emerging Mkts	12.04	1110.307
9	XXX2270	LM	JP TURNER	LEONARD GOLDBERG	7/21/2010	7/26/2010	B	GBFAX	VAN ECK EMERGING MARKETS	Diversified Emerging Mkts	11.52	164.931
10	XXX8420	LM	JP TURNER	LEONARD GOLDBERG	12/14/2009	12/17/2009	B	MTCAX	MFS TECHNOLOGY CLASS	Technology	12.58	111.29
11	XXX8420	LM	JP TURNER	LEONARD GOLDBERG	4/23/2010	4/28/2010	S	MTCAX	MFS TECHNOLOGY CLASS	Technology	13.37	111.29
12	XXX5111	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	10/21/2011	10/26/2011	S	SENAX	WELLS FARGO ADVANTAGE ENTERP A	Mid-Cap Growth	32.27004	113.813

LM TRADING CHART
EXHIBIT G

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
13	XXX1210	LM	JP TURNER	LEONARD GOLDBERG	9/17/2010	9/22/2010	B	SLANX	DWS LATIN AMERICA EQUITY FD	Latin America Stock	53.58	26.129
14	XXX5095	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	10/21/2011	10/26/2011	S	SLANX	DWS LATIN AMER EQTY FD A	Latin America Stock	41.07008	26.129
15	XXX1119	LM	JP TURNER	LEONARD GOLDBERG	9/17/2010	9/22/2010	B	SLANX	DWS LATIN AMERICA EQUITY FD	Latin America Stock	53.58	249.16
16	XXX5111	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	7/14/2011	7/19/2011	S	SLANX	DWS LATIN AMER EQTY FD A	Latin America Stock	48.30001	249.16
17	XXX8420	LM	JP TURNER	LEONARD GOLDBERG	11/18/2008	11/21/2008	B	SLANX	DWS LATIN AMERICA	Latin America Stock	30.3	31.023
18	XXX8420	LM	JP TURNER	LEONARD GOLDBERG	7/6/2009	7/9/2009	S	SLANX	DWS LATIN AMERICA	Latin America Stock	36.24	31.023
19	XXX5111	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	6/24/2011	6/29/2011	B	WFMCX	WELLS FARGO MID CAP	Mid-Cap Growth	6.440001	711.18
20	XXX2270	LM	JP TURNER	LEONARD GOLDBERG	6/18/2010	6/23/2010	S	VTFAX	INVESCO VAN KAMPEN	Technology	4.73	424.916
21	XXX5103	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	5/10/2011	5/13/2011	B	EEM	ISHARES MSCI EMERGING MKT IN	Diversified Emerging Mkts	48.81	44
22	XXX8862	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	12/22/2011	12/28/2011	S	EEM	ISHARES MSCI EMERGING MARKETS	Diversified Emerging Mkts	38.26	44
23	XXX6053	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	8/4/2014	8/7/2014	B	IEMG	ISHARES CORE MSCI	N/A	53.11000	44.00
24	XXX6053	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	10/22/2013	10/25/2013	B	IEV	ISHARES	Europe Stock	46.46000	53.00

LM TRADING CHART
EXHIBIT G

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
25	XXX6053	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	8/4/2014	8/7/2014	S	IEV	ISHARES	Europe Stock	46.27000	53.00
26	XXX5111	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	7/18/2011	7/21/2011	B	IJT	ISHARES TRUST S&P SC600 GR	Small Growth	79.649	146
27	XXX8863	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	4/12/2012	4/17/2012	S	IJT	ISHARES TRUST S&P SC600 GR	Small Growth	80.8	146
28	XXX5095	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	10/24/2011	10/27/2011	B	IYW	ISHARES TR DOW JONES TECH	Technology	65.98	28
29	XXX8861	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	3/27/2012	3/30/2012	S	IYW	ISHARES TR DOW JONES TECH	Technology	78.5901	28
30	XXX5111	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	10/24/2011	10/27/2011	B	IYW	ISHARES TR DOW JONES TECH	Technology	65.97	58
31	XXX8863	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	3/27/2012	3/30/2012	S	IYW	ISHARES TR DOW JONES TECH	Technology	78.59	58
32	XXX8861	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	3/27/2012	3/30/2012	B	RTH	MARKET VECTORS ETF TR	Consumer Cyclical	42.48	47
33	XXX6053	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	10/22/2013	10/25/2013	S	RTH	MARKET VECTORS ETF TR	Consumer Cyclica	57.58000	47.00
34	XXX8863	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	3/27/2012	3/30/2012	B	RTH	MARKET VECTORS ETF TR	Consumer Cyclical	42.48	100
35	XXX8863	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	4/8/2013	4/11/2013	S	RTH	MARKET VECTORS ETF TR	Consumer Cyclical	49.1601	100
36	XXX8863	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	12/20/2012	12/26/2012	B	VB	VANGUARD INDEX FUNDS	Small Blend	82.7899	124

LM TRADING CHART
EXHIBIT G

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
37	XXX8863	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	3/5/2013	3/8/2013	S	VB	VANGUARD INDEX FUNDS	Small Blend	88.5601	124
38	XXX0060	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	2/7/2014	2/12/2014	B	VV	VANGUARD LARGE CAP ETF	Large Blend	82.66000	20.00
39	XXX0060	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	6/4/2014	6/9/2014	S	VV	VANGUARD LARGE CAP ETF	Large Blend	88.77000	20.00
40	XXX0060	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	5/10/2013	5/15/2013	B	XHB	SPDR SERIES TRUST	Consumer Cyclica	31.86000	55.00
41	XXX0060	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	2/7/2014	2/12/2014	S	XHB	SPDR SERIES TRUST	Consumer Cyclica	32.03000	55.00
42	XXX8862	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	7/2/2012	7/6/2012	B	XHB	SPDR SERIES TRUST	Consumer Cyclical	21.33	78
43	XXX8862	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	9/19/2012	9/24/2012	S	XHB	SPDR SERIES TRUST	Consumer Cyclical	25.6801	78
44	XXX8862	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	12/22/2011	12/28/2011	B	XLF	SELECT SECTOR SPDR TRUST	Financial	13.04	125
45	XXX8862	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	7/2/2012	7/6/2012	S	XLF	SELECT SECTOR SPDR TRUST	Financial	14.665	25
46	XXX8862	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	7/2/2012	7/6/2012	S	XLF	SELECT SECTOR SPDR TRUST	Financial	14.661	100
47	XXX8863	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	4/12/2012	4/17/2012	B	XLK	SELECT SECTOR SPDR TRUST	Technology	30.02	372

LM TRADING CHART
EXHIBIT G

	Account Number	Customer	Firm Name	Registered Representative	TradeDate	Settlement Date	Buy Sell	Symbol	Security Description	Fund Category	Price	Quantity
48	XXX8863	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	12/20/2012	12/26/2012	S	XLK	SELECT SECTOR SPDR TRUST	Technology	29.3801	372
49	XXX8862	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	9/19/2012	9/24/2012	B	XPH	SPDR SERIES TRUST	Health	61.19	29
50	XXX0060	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	5/10/2013	5/15/2013	S	XPH	SPDR SERIES TRUST	Health	67.26000	29.00
51	XXX0060	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	6/4/2014	6/9/2014	B	XRT	SPDR SERIES TRUST	Consumer Cyclical	84.55000	19.00
52	XXX8863	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	3/5/2013	3/8/2013	B	XRT	SPDR SERIES TRUST	Consumer Cyclical	68.69	150
53	XXX8863	LM	NEWPORT COAST SECURITIES	LEONARD GOLDBERG	4/8/2013	4/11/2013	S	XRT	SPDR SERIES TRUST	Consumer Cyclical	70.201	150

Exhibit H

Exhibit H

Falsified Change of Address Forms

	Customer	Account Number	Firm	Form Date	Inaccurate Information
1	NB	xxx8865	Newport	2/27/2012	Both addresses listed on the change of address form belong to Goldberg's sales assistant
2	NB	xxx5016	Newport	7/1/2014	Both addresses listed on the change of address form belong to Goldberg's sales assistant
3	NB	xxx8882	Newport	7/1/2014	Both addresses listed on the change of address form belong to Goldberg's sales assistant
4	KN/RL	xxx8931	Newport	6/18/2014	New address on change of address form is the address of Goldberg's sales assistant
5	KN/RL	xxx1071	Newport	6/18/2014	New address on change of address form is the address of Goldberg's sales assistant
6	KN/RL	xxx4506	Newport	6/18/2014	New address on change of address form is the address of Goldberg's sales assistant