Pareteum - The Hal Turner Options Appreciation Club

Convenient amendments to stock vesting schemes

July 17, 2019 – We ask investors today to consider what Viceroy believes is an excessive enrichment by Pareteum's Executive Chairman and Principal Executive Officer's share ownership and compensation:

- Reflect a low level of confidence in the company given Hal's immediate offering of 2,000,000 shares as part of the 2018 Long-Term Incentive Plan
- Show the acquisition of Artilium helped Turner vest and sell shares in Pareteum at an accelerated rate, despite no clear reason for this vesting, save for a convenient amendment in the terms.

1. Hal Turner, Artilium

June 6, 2018

On June 13, 2018 Pareteum filed and 8K regarding an amendment to Turner's employment agreement.

- restricted stock awards shall become vested and exercisable with respect to 100% of the Restricted Stock Award in the event of a "Change of Control or Triggering Event" (as defined in the next sentence), on the first trading day of the subsequent calendar quarter. "Change of Control or Triggering Event" shall be defined as (i) the sale of all or substantially all of the Company, merger, consolidation or acquisition of the Company with, by or into another corporation, entity or person, and there is change of one (1) or more of the Company's Board of Directors, (ii) any change in the ownership of more than thirty percent (30%) of the stock of the Company in one or more related transactions, or (iii) immediately (and without further action of the parties) upon the Company tendering a binding offer to merge, or acquire all or substantially all of the assets or a controlling portion (which may be less than 50%) of the equity of another company(ies);
- all grants of equity contemplated herein, including, but not limited to, any grant of equity in lieu of cash owed, shall be made subject to applicable tax withholdings and other withholdings required by applicable law; provided, however, that the Company shall make any such tax payment on behalf of Executive;
- the Option Shares (as defined in the Employment Agreement) shall become vested and exercisable with respect to 100% of the Option Shares in the event of a "Change of Control or Triggering Event;" and

Figure 1 Pareteum 8K filed June 13, 2018¹

Notably, this amendment would vest all restricted stock awards at the start of each calendar quarter and immediately vest all option shares in the event of a "Change of Control or Trigerring Event". This amendment became effective on June 6, 2018, the day before a "Change of Control or Triggering Event" would occur.

June 7, 2018

Pareteum and Artilium announce acquisition agreement for USD104.7m which constitutes a "Change of Control or Triggering Event" in the amendment on June 6, 2018, the day prior, but which was only announced the following week.

Pareteum and Artilium
Announce Agreement for
Pareteum to Acquire Artilium in
\$104.7 Million Transaction



Figure 2 Pareteum and Artilium Announce Agreement for Pareteum to Acquire Artilium in \$104.7 Million Transaction²

Viceroy Research Group 1 viceroyresearch.org

¹ https://www.sec.gov/Archives/edgar/data/1084384/000114420418033968/tv496348_8k.htm

 $^{{}^2\,\}underline{\text{https://www.prnewswire.com/news-releases/pareteum-and-artilium-announce-agreement-for-pareteum-to-acquire-artilium-in-104-7-million-transaction-300661437.html}$

Turner's employment agreement was amended to immediately vest his options and speed up the vesting of restricted stock awards the day before an acquisition. No other employment agreements were amended in this way.

October 10, 2018

On October 10, 2018 Pareteum filed a Form S-8 effective the next day detailing the 2018 Long-Term Incentive Plan and an offering by Turner and Pareteum Director Yves Van Sante. Turner's offering is the full 2,000,000 shares offered under the 2018 plan.

Name	Position	Number of Shares Beneficially Owned	Number of Shares Included in the Offering(1)	Number of Shares Beneficially Owned After the Offering	Percentage of Shares of Common Stock Owned After the Offering
Robert H. Turner	Executive Chairman and Principal				
	Executive Officer	3,521,037(2)	2,000,000(3)	1,521,037(4)	1.5%
Yves Van Sante	Director	219,618(5)	40,000(6)	179,618(7)	*
ГОТАL			2,040,000		
* Less than 1% (1) Assumes th	e vesting, exercise and sale of all option	s and restricted stock	grants being offer	ed by the Selling Sl	nareholders.
"2017 Plan June 6, 20) 1,500,000 shares of common stock pun'), fully vested pursuant to the terms of a and (ii) 2,000,000 shares of common the date of award, and the remainder	of an amended emp a stock pursuant to a	loyment agreement restricted stock a	nt entered into with ward under the Pla	n the Company as n, of which one l

- 2019.(3) Includes 2,000,000 shares of common stock pursuant to a restricted stock award under the Plan, of which one half vested upon
- the date of award, and the remainder vest in equal monthly installments from January 2019 through December 2019.

 (4) Includes 1,500,000 shares of common stock pursuant to a restricted stock award under the 2017 Plan, fully vested pursuant to the terms of an amended employment agreement entered into with the Company as of June 6, 2018.

Figure 3 Pareteum Form S-8 filed October 10, 2018³

Turner's holdings also include 1,500,000 shares from the 2017 plan which vested at the beginning of the calendar quarter due to Pareteum's "Change of Control or Triggering Event" and Turner's timely amended employment agreement.

³ https://www.sec.gov/Archives/edgar/data/1084384/000114420418053470/tv504405 s8.htm



October 25, 2018

On October 25, 2018 Turner filed a Form-4 in which he acquired the 2,000,000 shares pursuant to the 2018 Long-Term Incentive Plan. A review of Turner's holdings show he had at some point sold 1,000,000 Pareteum shares in the 16 days since the Form S-8 referenced above.

				Date (Month/Day/Year)		Execution Date, if any					urities Acquired (A) or sed Of (D) (Instr. 3, 4 and 5)			5. Amount of Securities Beneficially Owned Following		6. Ownership Form: Direct (D) or Indirect (I) (Instr. 4)	Ownership
								Code	v	Amount	(A (D) or	Price		ed ction(s) 3 and 4)		(Instr. 4)
tock			10/25/20	018				A		2,000,000	1)	A	\$0.00	2,52	1,037(2)	D	
Table II - Derivative Securities Acquired, Disposed of, or Beneficially Owned (e.g., puts, calls, warrants, options, convertible securities)																	
onversion r Exercise rice of erivative ecurity	3. Transaction Date (Month/Day/Year)	Execu if any	tion Date,			of Deriv Secu Acqu (A) o Dispo of (D (Instr	vative irities ired r osed) r. 3, 4	Expira	ation D	ate	Amo Secu Unde Deriv Secu	unt of irities erlying rative irity (Ir	Der Sed (Ins	ivative curity	tive derivative Ownershi ty Securities Form:		Benefici Ownersh t (Instr. 4)
				Code	v	(A)	(D)	Date Exerc	isable	Expiration Date	Title	or Num of	ber				
rriee	onversion Exercise ice of erivative	onversion Exercise (ce of enrivative curity	Table II Onversion Date Exercise (Month/Day/Year) Circle of orrivative curity 3. Transaction Date Executif any (Month Country)	Table II - Derivat (e.g., pt (e.g., pt Date (Month/Day/Year)) 3. Transaction Date (Month/Day/Year) Green Date (Month/Day/Year) 3. Transaction Date (Execution Date, if any (Month/Day/Year))	Table II - Derivative St (e.g., puts, c. (e.g., puts, c.) Date Severise (Month/Day/Year) 3A. Deemed Execution Date Exercise (Month/Day/Year) (Month/Day/Year) 8) Code Code	Table II - Derivative Securit (e.g., puts, calls, vanishing of the conversion Exercise (Month/Day/Year) (Month/Day/Year) (Month/Day/Year) (Month/Day/Year) (Month/Day/Year) (Code V	Table II - Derivative Securities / (e.g., puts, calls, warrange) Onversion Date Exercise ((Month/Day/Year) 3A. Derivative Execution Date, if any (Month/Day/Year) (Month/Day/Year)	Table II - Derivative Securities Acquee.g., puts, calls, warrants Onversion Exercise (Month/Day/Year) Onversion Exercise (Month/Day/Year) Onversion Date Execution Date, if any (Month/Day/Year) O	Table II - Derivative Securities Acquired, (e.g., puts, calls, warrants, optic Date Execution Date Execution Date (Month/Day/Year) (Month/Day/	Table II - Derivative Securities Acquired, Dispose (e.g., puts, calls, warrants, options, calls, ca	Table II - Derivative Securities Acquired, Disposed of, (e.g., puts, calls, warrants, options, convertible onversion Exercise (Month/Day/Year) 3. Transaction Date Execution Date Execution Date (Month/Day/Year) 4. Transaction Date Execution Date (A) or Derivative Acquired (A) or Disposed of (D) (Instr. 3, 4 and 5) Code V (A) (D) Date Expiration Date Expiration Date	Table II - Derivative Securities Acquired, Disposed of, or B (e.g., puts, calls, warrants, options, convertible securities of (Month/Day/Year)	Table II - Derivative Securities Acquired, Disposed of, or Benefice.g., puts, calls, warrants, options, convertible securities of Date (Month/Day/Year) (Month/	Table II - Derivative Securities Acquired, Disposed of, or Beneficially (e.g., puts, calls, warrants, options, convertible securities) 3. Transaction Date Execution Date (Month/Day/Year) (Month/Day/Year) 3. Transaction Date Execution Date (if any (Month/Day/Year) (Month/Day/Year) 5. Number of Derivative Securities Acquired (A) or Disposed of (D) (Instr. 3, 4 and 5) Code V (A) (D) Date Exercisable and Expiration Date (Month/Day/Year) Securities Underlying Derivative Security (Instr. 3 and 4) Amount or Number of Date (Instr. 3, 4 and 5)	Table II - Derivative Securities Acquired, Disposed of, or Beneficially Owner (e.g., puts, calls, warrants, options, convertible securities) 3. Transaction Date (Month/Day/Year) 3. Transaction Date (Execution Date (Month/Day/Year) 4. Transaction Code (Instr. 8) 5. Number of Expiration Date (Month/Day/Year) 7. Title and Amount of Securities (Month/Day/Year) 8. Price of Expiration Date (Month/Day/Year) 8. Price of Derivative Acquired (Month/Day/Year) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative (Month/Day/Year) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Security (Instr. 5) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Security (Instr. 5) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 8. Price of Derivative Security (Instr. 5)	Table II - Derivative Securities Acquired, Disposed of, or Beneficially Owned (e.g., puts, calls, warrants, options, convertible securities) 3. Transaction Date (Month/Day/Year) 3. Date (Month/Day/Year) 4. Transaction Code (Instr. derivative Securities) 5. Number of Exercise (Month/Day/Year) 6. Date Exercisable and Experiation Date (Month/Day/Year) 7. Title and Amount of Securities Underlying Derivative Securities (Month/Day/Year) 8. Price of Derivative Securities Underlying Derivative Security (Instr. 5) 7. Disposed of (D) (Instr. 3, 4) 7. Title and Amount of Securities Underlying Derivative Securities (Month/Day/Year) 8. Price of Derivative Securities (Month/Day/Year) 9. Number Of Derivative Securities (Month/Day/Year) 9. Num	Table II - Derivative Securities Acquired, Disposed of, or Beneficially Owned (e.g., puts, calls, warrants, options, convertible securities) 3. Transaction Date Exercisable and Date Execution Date (Month/Day/Year) (Month/Day/Year) (Month/Day/Year) 5. Number of Expiration Date (Month/Day/Year) (Month/Day/Year) (Month/Day/Year) (Month/Day/Year) 6. Date Exercisable and Expiration Date (Month/Day/Year) (Month/Da

Figure 4 Robert Turner Form-4 filed October 26, 20184

Based on the disclosure, it appears these shares were issued as part of the 2017 plan.

Turner's windfall from Pareteum's acquisition of Artilium seems a good a time as any to take a look at the company in more detail. In the calculations in our original report we made the assumption that these businesses operated on the same 30-day billing and payment cycle as Pareteum⁵.

2. Artilium

The announcement of Pareteum's acquisition of Artilium for USD104.7m was made on June 7, 2018.

At the time of its acquisition Artilium was structured as four main trading businesses⁶:

- 1. Artilium NV, whose core product is the ARTA platform which allows network operators to open networks to third party developers.
- 2. United Telecom NV, a provider/reseller of telecommunications services in Belgium and the Netherlands.
- 3. Artilium BV, operates under the trade names of Comsys and Livecom. Comsys provides interactive telephony services, multi-channel call center solutions and other communications services.
- 4. Interactive Digital Media, an international cloud communications provider acquired in January 2018 focused on enterprise messaging and communications.

None of these segments generated positive profit, or EBIT since 2014 when Artilium NV and United Telecom were the only segments. Artilium reported an EUR268,000 profit that year.

Viceroy Research Group 3 viceroyresearch.org

⁴ https://www.sec.gov/Archives/edgar/data/1084384/000114420418055575/xslF345X03/tv505599 4.xml

 $^{^{\}rm 5}$ This assumption was made to gauge the collectability of revenues from Pareteum core customers.

⁶ All referenced Artilium filings can be found at: https://beta.companieshouse.gov.uk/company/03904535/filing-history

	Artilium United Telecom Com:						Total			
					l	nsys		M		
İ	2018	2017	2018	2017	2018	2017	2018	2017	2018	2017
	Eur'000	Eur'000	Eur'000	Eur'000	Eur'000	Eur'000	Eur'000	Eur'000	Eur'000	Eur'000
Revenue	3,903	4,148	4,547	4,128	2,070	2,177	5,720	-	16,240	10,453
Adjusted EBITDA Depreciation, amortisation and	(357)	251	319	(60)	234	188	288	-	484	379
impairments	(323)	(118)	(527)	(844)	(968)	(861)	(375)	_	(2,193)	(1,823)
Recurring EBIT	(680)	133	(208)	(904)	(734)	(673)	(87)	-	(1,709)	(1,444)
Non-recurring items	(269)	(144)	(20)	(73)	(10)	(10)		-	(299)	(228)
Redundancy costs	(269)	(144)	(20)	(73)	(10)	(10)	-	-	(299)	(228)
EBIT .	(949)	(11)	(228)	(977)	(744)	(683)	(87)	-	(2,008)	(1,672)
Interest expense/other										
finance expense	(82)	(135)	(82)	(121)	(82)	(68)	(3)	-	(250)	(324)
Income tax	3	(7)	87	66	167	177	26	-	283	236
Segment loss	(1,028)	(154)	(223)	(1,032)	(659)	(574)	(64)	-	(1,975)	(1,760)

Figure 5 Artilium 2018 Segment Reporting

Artilium also exhibits the same issues as Pareteum regarding a growing receivable balance suggestive of difficulty collecting on its revenues. As of mid-2018, Artilium had 77 days receivable and an average credit period on sale of goods of 87 days.

	2018	
	Eur'000	Eu
Amounts receivable for the sale of goods and services	3,426	
Allowance for doubtful debts	(505)	
Allowance for doubtful debts	2,921	
Other receivables	2,921	
Accrued income	245	
Accrued income		
Annual Control of the	3,447	
Less non-current portion		(1
Current portion	3,447	- :
fair value. The average credit period taken on sales of goods is 87 days (2017 on receivables.	: 67 days). No interest	t is cha
Included within trade and other receivables is an amount of €360,000 (2017: that were past due at 30 June, but not impaired. The Group believes the		
	hat the balances are of those customers.	
that were past due at 30 June, but not impaired. The Group believes the recoverable based on a review of past payment history and the credit quality	hat the balances are of those customers.	
that were past due at 30 June, but not impaired. The Group believes the recoverable based on a review of past payment history and the credit quality	hat the balances are of those customers. w:	ultim
that were past due at 30 June, but not impaired. The Group believes the recoverable based on a review of past payment history and the credit quality	hat the balances are of those customers. w: 2018	
that were past due at 30 June, but not impaired. The Group believes the recoverable based on a review of past payment history and the credit quality. The ageing analysis of past due but not impaired receivables are shown below	hat the balances are of those customers. w: 2018 Eur'000	ultim
that were past due at 30 June, but not impaired. The Group believes the recoverable based on a review of past payment history and the credit quality. The ageing analysis of past due but not impaired receivables are shown below. Up to three months The Group holds no collateral against these receivables at the reporting date. As at 30 June 2017 €505,000 of trade receivables were impaired (2017: €24 and has been determined by reference to the age of the debt or where amouby customer basis. To the extent they have not been specifically provided a	hat the balances are of those customers. w: 2018 Eur'000 3607,000). This allowance unts are in dispute on ugainst, the trade rece	Eu e is spo a custo eivable
that were past due at 30 June, but not impaired. The Group believes the recoverable based on a review of past payment history and the credit quality. The ageing analysis of past due but not impaired receivables are shown below. Up to three months The Group holds no collateral against these receivables at the reporting date. As at 30 June 2017 €505,000 of trade receivables were impaired (2017: €24 and has been determined by reference to the age of the debt or where amounts.	hat the balances are of those customers. w: 2018 Eur'000 3607,000). This allowance unts are in dispute on ugainst, the trade rece	Eu e is spe a custo ivable:
that were past due at 30 June, but not impaired. The Group believes the recoverable based on a review of past payment history and the credit quality. The ageing analysis of past due but not impaired receivables are shown below. Up to three months The Group holds no collateral against these receivables at the reporting date. As at 30 June 2017 €505,000 of trade receivables were impaired (2017: €24 and has been determined by reference to the age of the debt or where amouby customer basis. To the extent they have not been specifically provided a	hat the balances are of those customers. w: 2018 Eur'000 3607,000). This allowance unts are in dispute on ugainst, the trade rece	Eu e is spo a custo eivable as follo
that were past due at 30 June, but not impaired. The Group believes the recoverable based on a review of past payment history and the credit quality. The ageing analysis of past due but not impaired receivables are shown below. Up to three months The Group holds no collateral against these receivables at the reporting date. As at 30 June 2017 €505,000 of trade receivables were impaired (2017: €24 and has been determined by reference to the age of the debt or where amouby customer basis. To the extent they have not been specifically provided a	hat the balances are of those customers. w: 2018 Eur'000 3607,000). This allowance unts are in dispute on ugainst, the trade rece for doubtful debts is a	Eu e is spe a custo eivable: as follo
that were past due at 30 June, but not impaired. The Group believes the recoverable based on a review of past payment history and the credit quality. The ageing analysis of past due but not impaired receivables are shown below. **Up to three months** The Group holds no collateral against these receivables at the reporting date. As at 30 June 2017 €505,000 of trade receivables were impaired (2017: €24 and has been determined by reference to the age of the debt or where amouby customer basis. To the extent they have not been specifically provided a considered to be of sound credit rating. The ageing analysis of the allowance.	hat the balances are of those customers. w: 2018 Eur'000 360 7,000). This allowance unts are in dispute on gainst, the trade rece for doubtful debts is a	Eu e is spe a custo ivable:
that were past due at 30 June, but not impaired. The Group believes the recoverable based on a review of past payment history and the credit quality. The ageing analysis of past due but not impaired receivables are shown below. Up to three months The Group holds no collateral against these receivables at the reporting date. As at 30 June 2017 €505,000 of trade receivables were impaired (2017: €24 and has been determined by reference to the age of the debt or where amouby customer basis. To the extent they have not been specifically provided a	hat the balances are of those customers. w: 2018 Eur'000 360 7,000). This allowance unts are in dispute on gainst, the trade rece for doubtful debts is a	Eu e is spe a custo eivable: as follo

Figure 6 Artilium 2018 Trade and Other Receivables



Figure 7 Artilium Historic Receivables and Credit Analysis

Artilium's days receivable has shrunk while the average credit period has increased. The company makes no mention of its billing terms, but it can be inferred that Artilium's customer base as a whole is taking longer to pay its bills. We do not believe this loss-making acquisition is an adequate reason to immediately vest Turner's shares.

3. Keeping it in the family

Turner's largesse is not restricted to himself: Pareteum has used his son Rob Turner's firm InTown legal in 2017 and 2018. While the quantum of this payment is not large the only disclosure given regarding InTown Legal's services is the cost of its services and their "at-will".

Note 25. Related Party Transactions

During 2018 and 2017, the Company retained Robert Turner of InTown Legal Services, who is the son of Robert H. Turner, Executive Chairman of the Board. InTown Legal Services has a \$5,000 per month minimum retainer with the Company and was paid \$155,112 in 2018 and \$66,114 in 2017. The agreement between the Company and InTown Legal Services is an at will agreement.

Figure 8 Pareteum 2018 10-K Related Party Transactions

InTown legal's website lists only two personnel: Rob Turner and Yukiko Takeuchi as an outside consultant.

4. Associations

While finalizing several reports on Pareteum's "Questionable dealings" and "benefits", Viceroy take a look at one of Pareteum's associates.

On October 23, 2018 Pareteum listed on the NASDAQ 7 Pareteum celebrated with the ceremonial NASDAQ bell-ringing on May 29, 2019. As with most US companies, Pareteum invited their closest associates and advisors to the event. Another archetypical red flag being who executives associate with or employ as 'consultants'.

Why was Hal Turner's friend/associate Ibrahim Kurtulus in attendance for the ceremonial bell-ringing⁸. **What is Kurtulus's role for Pareteum?**

Viceroy Research Group

⁷ https://www.prnewswire.com/news-releases/pareteum-to-begin-trading-on-nasdaq-300729194.html

https://business.nasdag.com/discover/market-bell-ceremonies/detail.html#!/!?ceremonyId=8638





viceroyresearch.org

Figure 9 Ibrahim Ethem Kurtulus with Pareteum Management

It's not the first time that Mr. Kurtulus has appeared with Hal Turner and Ted O'Donnell; the trio appear in a Facebook post dated May 1, 2019 promoting Pareteum's non-existent cryptocurrency operations .



Figure 10 Pareteum Corporation – "Ibrahim Kurtulus with Robert H.(Hal) Turner and Ted O'Donnell!"9

We have not been able to uncover any relationship, business between Kurtulus and Pareteum or any of its senior management. However, a FINRA check on Kurtulus shows a blemished past as a broker with several

⁹

sanctions to his name including several customer disputes at Windsor Street Capital and opening unauthorized trading accounts when not employed.

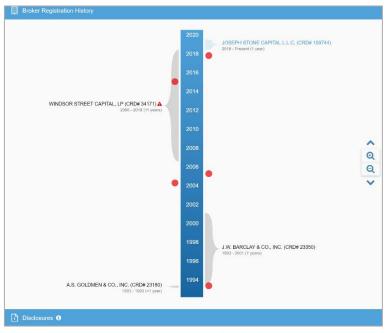


Figure 11 FINRA BrokerCheck

Kurtulus made headlines briefly in 2016 and 2017 over a payment to then-National Security Advisor Michael Flynn which several outlets connected to an Op-ed piece later written by Flynn¹⁰.

Pareteum's ability to check the backgrounds of prospective employees is questionable at best, see our report on David John Fondots. Viceroy find it hard to believe that Pareteum's management were unaware of Mr David John Fondot's history at the time of employment. referring to him as David John¹¹.

As Pareteum appear comfortable with Mr David JohN Fondot's chequered history, TEUM will have no issue with Mr Kurtulus various run-ins with FINRA over the years with customer disputes and settling allegations of opening brokerage accounts for individuals without their prior knowledge, authorization, or consent; followed by various sanctions¹².

5. Conclusion

As a recap, Viceroy have exposed "fake" customers, contracts "celebrated" by Pareteum that are highly unlikely to ever be fulfilled, simply because the customers are not capable of such sized orders. The receivables are simple evidence of that. We envisage Pareteum ignoring the obvious and no doubt celebrate more hollow successes similar to their last announcement of earnings. We believe these announcement lack real substance.

¹⁰ https://medium.com/@Pitel/whos-been-bending-the-ear-of-lt-gen-michael-flynn-c1af966fd7f8

¹¹ https://www.prnewswire.com/news-releases/pareteum-targets-growth-in-the-americas-with-new-hires-300734068.html

¹² https://brokercheck.finra.org/individual/summary/2287372



6. Appendix

10/18/2017	Customer Dispute	Settled	~
1/13/2015	Customer Dispute	Settled	~
4/8/2005 F	Regulatory	Final	~
4/12/2004 F	Regulatory	Final	~
5/14/1993 E	Employment Separation After Allegations		~

4/12/2004	Regulatory	Final	^
Initiated By	NASD		
Allegations	CUSTOMERS WITHO CONSENT; AND EFF	ESPONDENT OPENED BROKERAGE ACCOUNTS FOR PUBLIC BUT THEIR PRIOR KNOWLEDGE, AUTHORIZATION, OR ECTED TRANSACTIONS IN THE ACCOUNTS OF PUBLIC BUT THEIR PRIOR KNOWLEDGE, AUTHORIZATION, OR	
Resolution	Decision & Order of O	ffer of Settlement	
Sanctions	Civil and Administration	e Penalty(ies)/Fine(s)	
Sanctions	Suspension		
Regulator Statement	TO THE DESCRIBED HE IS FINED \$7,500, MEMBER FIRM IN AN	G OR DENYING THE ALLEGATIONS, RESPONDENT CONSENTE SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, AND SUSPENDED FROM ASSOCIATION WITH ANY NASD IY CAPACITY FOR 10 BUSINESS DAYS. THE SUSPENSION ON DECEMBER 6, 2004, AND WILL CONCLUDE ON DECEMBER).	
Broker Comment	THAT WITH RESPECTINDIVIDUALS CLAIM AT THE TIME OF THE WITH INFORMATION CUSTOMERS (OUT OF AND PAID FOR THE PURCHASE OF THE GIVEN THE SETTLE! A \$7,500 FINE, I AGR THE COMPLAINT, TO OF A CONTESTED H	ICED A DISCIPLINARY PROCEEDING AGAINST ME ALLEGING IT TO A 2002 INITIAL PUBLIC OFFERING ("IPO") THREE (3) ED NOT TO HAVE OPENED BROKERAGE ACCOUNTS WITH ME IPO, WHEN IN FACT ALL THREE (3) OF THEM PROVIDED ME TO OPEN SUCH ACCOUNT. MOREOVER, TWO (2) OF THESE OF APPROXIMATELY 22 OTHER CUSTOMERS WHO PURCHASE IPO IN QUESTION) CLAIMED NOT TO HAVE AUTHORIZED THE IPO, WHICH THEN FELL IN PRICE AFTER THE TRADE DATE. MENT OFFER OF A TEN (10) BUSINESS DAY SUSPENSION AND REED WITHOUT ADMITTING OR DENYING THE ALLEGATIONS OF THOSE TERMS INSTEAD OF RISKING THE UNPREDICTABILITY EARING, AT WHICH TWO (2) OF THE CUSTOMERS, OVER RIGHTIED TO TESITFY BY TELEPHONE.	D OF

4/8/2005	Regulatory	Final	^
Initiated By Allegations		STRATION AS A SALESPERSON IN THE STATE OF ILL ATION PURSUANT TO SECTION 8.E(1)(J) OF THE ILLIN	
Resolution	Consent		
Sanctions	WITHDRAWAL		
Sanction Details	OF ILLINOIS AND THE	VITHDRAW HIS SALESPERSON REGISTRATION IN TH RESPONDENT WILL NOT REAPPLY FOR A PERIOD O ENT WILL ALSO PAY FOR THE COST OF THE INVEST	OF TWO



1/13/2015	Customer Dispute	Settled	^
Allegations	UNSUITABLE INVESTMEN	т	
Damage Amount Requested	\$300,000.00		
Settlement Amount	\$45,000.00		
Broker Comment	entered into a "General Sett ("Kurtulus") the broker of red a witness during the mediati agreement was executed in claims and the agreement o acknowledgement, admission released of liability or wrong any funds or fees to the sett [REDACTED]. Mr. Kurtulus in [REDACTED] was constanting great risk in the potential of return was 13.5% per year or preserve the capital of [RED Depression. Based on the dismissed all claims against	TED] through mediation against Meyers Associates, L.P. thement & Release" ("Agreement"). Mr. Ibrahim Kurtulus cord for [REDACTED] account at Meyers Associates served as ion proceeding. [REDACTED] acknowledged that the connection with the compromise and settlement of disputed of payment of \$45,000 provided for did not constitute and on, or concession on the part of Meyers, Kurtulus or Meyers adding. It should be noted that Mr. Kurtulus did not contribute thement. At all times Mr. Kurtulus denied all allegations of has stated that this was a clear case of investor's remorse. By informed that the markets have great risks and investing has loss of capital. From the inception of the account the average vs. S & P averaged 0.075%. In 2008 Mr. Kurtulus was able to ACTED] in one of the dangerous economies since the Great of General Settlement & Release ("Agreement") [REDACTED] in Meyers and Ibrahim Kurtulus. We feel this matter should be lived in the CRD system for non-reportable and non-disclosable.	

10/18/2017	Customer Dispute	Settled	^
Allegations	UNSUITABLE INVESTM	ENT ADVICE.	
Damage Amount Requested	\$100,000.00		
Settlement Amount	\$14,999.99		
Broker Comment	Kurtulus ("Kurtulus") the Street Capital served as account with Mr. Kurtulu to a Settlement Agreeme other expense, inconven arbitration proceeding. T acknowledgment, admis or wrongdoing. The Sett Mr. Kurtulus not having enegligent act. Settlemen (Kurtulus) expressly den contractual obligation or and had signed risk disc who maintained account and was suitable in relat resulted in good results. fluctuations brought by the all allegations of claimar remorse attempting to piconstantly informed that potential of loss of capital account and settlement discovery process had no Settlement Agreement a all counterclaims agains considerations of econoric streets.	bese entered into a Settlement Agreement and Release. Mr. Ibrahim broker of record for account at Meyers Associates / Windsor a witness during the proceeding. The Claimant maintained an sor 18 years without ever complaining. The parties have agreed ent and Release in the amount of \$14,999.99 solely to avoid any ience, distractions and inherent uncertainties associated with any he Settlement Agreement and Release did not constitute an sion, or concession on the part of Kurtulus and released of liability lement Agreement and Release was accepted by the claimant in engaged in any wrongdoing, malfeasance, misfeasance or at Agreement and Release was accepted by the claimant in that he ied having violated any applicable rule, regulation, statute, any other duty to claimant. The Claimant was voiced recorded losure statements in confirming he was a sophisticated investor, is with other firms. Transaction(s) was authorized by the customer ions to the client's investment objectives and financials and One single loss in 18 years was solely attributable to market ne worst fall in oil prices in history. At all times Mr. Kurtulus denied it. Mr. Kurtulus has stated that this was a clear case of investor's occure unwarranted stock market insurance. [CLAIMENT] was the markets have great risks and investing has great risk in the al. Mr. Kurtulus vehemently denied any wrongdoing in customer by Claimant is a testament to it. Claimant realized the facts during o merit and all facts were against him Claimant decided to a not Release Mr. Kurtulus of any wrongdoing. Mr. Kurtulus dropped to claimant begrudgingly determined to settle this matter based on mic practicality and for less than the anticipated costs of defense, tranted and the matter was closed based on Settlement Agreement	



5/14/1993	Employment Separation After Allegations	^
Firm Name	A.S. GOLDMAN & COMPANY INC.	
Termination Type	Permitted to Resign	
Allegations	Not Provided THE ALLEGATIONS AGAINST ME WERE THAT I STOLE ACCOUNT STATEMENTS OF OTHER BROKERS WITH THE INTENT OF SELLING THEM.	
Broker Comment	Not Provided I WANT TO SAY THAT THESE ALLEGATIONS AGAINST ME ARE COMPLETELY FALSE AND THAT THESE STATMENTS AGAINST ME WERE PROMPTED BY A PERSONAL CONFLICT BETWEEN MYSELF AND A BIG COMMISSIONED PRODUCER AT A.S. GOLDMAN NAMED JOHN PISCOPA. BECAUSE OF OUR PERSONAL DIFFERENCES ANAND BECAUSE HE FOUND OUT I WAS LEAVING A.S. GOLDMAN & CO., HE USED HIS POSITION THERE TO HURT MY CHANCES OF SECURING ANOTHER JOB BY FALSELY MAKING THIS CLAIM. I NEVER WAS IN POSESSION OF ANY STATEMENTS OTHER THAN THOSE OF JOHN DEMONE MY DESK PARTNER WHO ASKED ME TO HOLD THEM.	