

Puerto Rico Securities Arbitration Settlements and Awards Sure to Exceed \$1 Billion

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Introduction

In 2013, a shrinking economy and the government's loss of continued access to capital markets necessary to make interest payments, refinance principal coming due and to fund an unsustainable government deficit caused Puerto Rico tax exempt bond prices to fall substantially.

Puerto Rico brokerage firms' customers held poorly diversified securities accounts, concentrated in Puerto Rico municipal bonds or closed end funds that held leveraged portfolios of Puerto Rico municipal bonds. Often these accounts were further leveraged using margin debt, lines of credit or proceeds from non-purpose loans recycled through third-party banks.

The decline in Puerto Rico municipal bond prices combined with widespread concentrated and leveraged brokerage accounts wiped out many Puerto Rican's investment portfolios in the second half of 2013.

Settlements and awards recently exceeded \$500 million as a result of resolving just 1,719 cases. With 1,502 cases still pending and likely another 1,000 to be filed, total settlements and awards in securities arbitrations in Puerto Rico will be between \$1 billion and \$1.5 billion. See Figure 1.

Figure 1: Monetary Results to Date

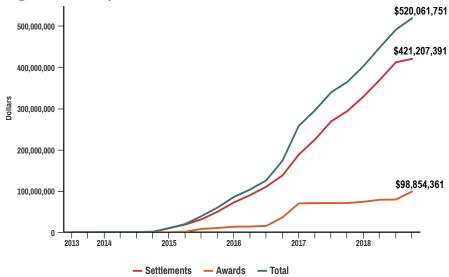


Table 1: Securities Arbitrations against UBS, Santander, Popular, Oriental, and Merrill Lynch in Puerto Rico

	Securities Arbitrations in Puerto Rico Since 2013												
]	Monetary	Results							
		Filed	Settled	Arbit	rated	Withdrawn	Pending	Settlements	Awards				
				Win	Loss								
2013	Q4	44					44						
Subtotal		44											
2014	Q1	133					177	\$232,232					
	Q2	200					377						
	Q3	185	1				561	\$206,102					
	Q4	194	4				751	\$400,118					
Subtotal		712	5					\$838,451					
2015	Q1	72	19	1	1		802	\$8,921,500	\$17,500				
	Q2	97	29	2		1	867	\$8,733,886	\$1,200,000				
	Q3	250	65	4	1		1,046	\$12,632,975	\$6,611,486				
	Q4	182	85	3	1	5	1,134	\$18,623,770	\$2,304,099				
Subtotal		601	198	10	3	6		\$48,912,131	\$10,133,085				
2016	Q1	115	109	4	1	4	1,131	\$22,390,465	\$3,132,588				
	Q2	129	110	1	2	13	1,134	\$17,556,703	\$395,197				
	Q3	159	123	3		5	1,162	\$20,672,135	\$1,604,856				
	Q4	90	146	4		3	1,099	\$27,252,729	\$20,570,976				
Subtotal		493	488	12	3	25		\$87,872,032	\$25,703,617				
2017	Q1	76	157	6		2	1,010	\$50,251,567	\$33,788,296				
	Q2	139	135	2	1	1	1,010	\$36,564,118	\$866,678				
	Q3	150	117			2	1,041	\$44,007,500					
	Q4	200	120				1,122	\$26,498,933					
Subtotal		565	529	8	1	5		\$157,322,117	\$34,654,974				
2018	Q1	216	107	5	1	3	1,222	\$35,217,277	\$3,174,970				
	Q2	251	149	1	1	9	1,313	\$40,414,122	\$4,895,947				
	Q3	270	111	2		3	1,467	\$42,607,711	\$550,000				
	Q4	70	30	3	1	1	1,502	\$8,023,549	\$19,741,768				
Subtotal		807	397	11	3	16		\$126,262,659	\$28,362,685				
To Date		3,222	1,617	41	10	52	1,502	\$421,207,391	\$98,854,361				

Arbitration Statistics

At least 3,222 arbitration cases have been filed against UBS Financial Services Inc. of Puerto Rico, Santander Securities LLC, Popular Securities LLC, Oriental Financial Services Corp. and Merrill Lynch, Pierce, Fenner & Smith Inc. between October 1, 2013 and November 15, 2018. See Table 1 and Figure 2. 2

The number of new arbitration filings peaked in 2014 at 712 but 807 new arbitrations have been filed so far in 2018. Settlements and arbitration awards naturally lag filings. So far in

2018, 807 new cases have been filed and only 427 have been resolved so pending cases have increased dramatically. With at least 1,502 cases still pending as of November 15, 2018, and new cases still being filed each quarter, it will be several more years before the Puerto Rico securities arbitrations associated with municipal bond losses in 2013 and thereafter are wound down.

1,617 cases have been settled for a total of \$421.2 million. 51 cases have gone to final arbitration hearings resulting in 41 customer awards totaling \$98.9 million as of November 15, 2018.

Arbitration filings against brokerage firms in Puerto Rico have increased dramatically since 2012. Despite having roughly 1% of the mainland population and 1/2 of 1% of the mainland economy, customer arbitration filings in Puerto Rico have been over 22% of the mainland filings from 2014 to 2018. 35% of customer filings so far in 2018 have been in Puerto Rico. See Figure 3.

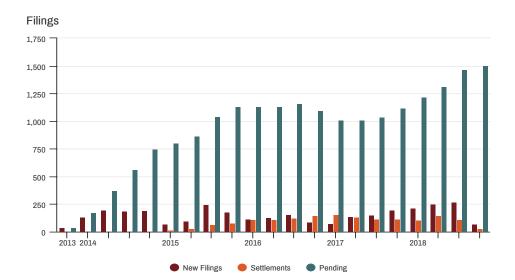


Figure 2: Filings Continue to Accumulate, Pending Claims Increased

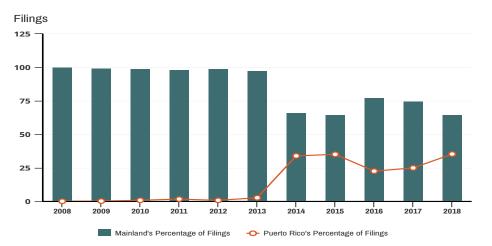


Figure 3: Arbitration Filings in Puerto Rico **Increased Dramatically** After 2012

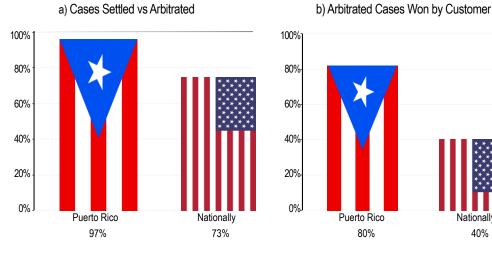


Figure 4: Cases Settled vs ArbitrateD in Puerto Rico and Nationally; Arbitrated Cases Won by Customers in Puerto Rico and Nationally

As we explain below, these arbitrations are filed against brokerage firms, not individual brokers. Yet, FINRA forces individual brokers who are not being sued to report the arbitration filings and settlements as black marks on their records while leaving the brokerage firms' public disclosures largely unscathed.

The 1,617 settled cases through November 15, 2018 are 96.9% of the Puerto Rico cases which were either settled or adjudicated. According to FINRA 72.6% of all cases which were either settled or adjudicated from 2014 to 2016 were settled. See Figure 4 a).

At 41-10, customers have so far won 80.4% of the final awards. In contrast, according to FINRA, customers won only 525 of 1,309 (40.1%) final awards during the 2014-2016 time period. The Claimants in Puerto Rico securities arbitrations going to a hearing have been more than twice as successful as the typical FINRA claimant. See Figure 4 b).

40%

The much lower proportion of Puerto Rico cases which go to a hearing than mainland cases and the fact that customers are winning in Puerto Rico at twice the national average strongly suggests too many cases are settling in Puerto Rico rather than going to a hearing.

2,219 of the arbitration cases - 68.9% of the total reported by November 15, 2018 – have been filed against UBS Financial Services Inc. of Puerto Rico ("UBS PR"). UBS PR has settled or arbitrated 1,370 of its cases and 34 have been withdrawn so 815 remained reported as pending on November 15, 2018. See Table 2 and Figure 7. In addition, 536 of the arbitration cases - 16.6% of the total reported by November 15, 2018 – have been filed against Santander Securities LLC ("Santander"). Santander had settled or arbitrated 146 cases and 3 have been withdrawn so 387 remained reported as pending on November 15, 2018.

215 of the arbitration cases - 6.7% of the total reported by November 15, 2018 have been filed against Popular Securities LLC ("Popular"). Popular had settled or arbitrated 62 cases and 10 were withdrawn so 143 remained reported as pending on November 15, 2018.

99 of the arbitration cases - 3.1% of the total reported by November 15, 2018 have been filed against Merrill Lynch. Merrill Lynch had settled or arbitrated 51 cases and 3 were withdrawn so 45 remained reported as pending on November 15, 2018.

153 of the arbitration cases - 4.8% of the total reported by November 15, 2018 – have been filed against Oriental Financial Services Corp. ("Oriental"). Oriental had settled or arbitrated 39 cases and 2 has been withdrawn so 112 remained reported as pending on November 15, 2018.

Table 2: Securities Arbitrations Filed and Pending by Brokerage. Firm

	Securities Arbitrations in Puerto Rico												
		7	Total	UBS PR		Sant	ander	Po	pular	Merr	ill Lynch	Or	iental
		Filed	Pending	Filed	Pending	Filed	Pending	Filed	Pending	Filed	Pending	Filed	Pending
2013	Q4	44	44	37	37	2	2	1	1	3	3	1	1
Subtotal		44		37		2		1		3		1	
2014	Q1	133	177	119	156	6	8	1	2	5	8	2	3
	Q2	200	377	168	324	13	21	11	13	4	12	4	7
	Q3	185	561	133	456	24	45	12	25	10	22	6	13
	Q4	194	751	163	617	11	54	11	36	5	27	4	17
Subtotal		712		583		54		35		24		16	
2015	Q1	72	802	55	655	7	59	7	43	2	29	1	16
	Q2	97	867	84	713	4	59	1	44	3	31	5	20
	Q3	250	1,047	218	875	15	70	6	45	8	36	3	21
	Q4	182	1,135	146	950	16	77	10	49	6	34	4	25
Subtotal		601		503		42		24		19		13	
2016	Q1	115	1,132	84	940	16	79	8	54	2	31	5	28
	Q2	129	1,135	92	922	23	97	7	57	3	33	0	26
	Q3	159	1,163	105	921	31	117	10	59	8	37	7	29
	Q4	90	1,100	60	845	16	127	5	59	6	34	8	35
Subtotal		493		341		86		30		19		20	
2017	Q1	76	1,011	56	764	13	127	2	54	2	31	3	35
	Q2	139	1,011	82	734	33	146	13	60	7	37	4	34
	Q3	150	1,042	78	709	35	175	18	76	7	40	12	41
	Q4	200	1,022	108	709	42	210	24	97	6	45	20	61
Subtotal		565		324		123		57		22		39	
2018	Q1	216	1,222	112	738	67	264	15	103	2	39	20	78
	Q2	251	1,313	131	743	73	319	27	124	4	39	16	88
	Q3	270	1,467	151	807	70	371	23	142	6	42	20	105
	Q4	70	1,502	37	815	19	387	3	143	3	45	8	112
Subtotal		807		431		229		68		15		64	
To Date		3,222	1,502	2,219	815	536	387	215	143	99	45	153	112

The number of new arbitrations filed has increased each quarter since the 1st quarter of 2017. Filings in the 2nd and 3rd quarters of 2018 exceed the previous highest quarterly filings in the 3rd quarter of 2015. As a result, the number of filings in Puerto Rico continues to rapidly accumulate. See Figure 5.

After dipping in 2017, the number of pending arbitrations has increased 50% in 2018. So far in 2018, 807 new cases have been filed and only 327 have been resolved and the number of pending cases now exceeds 1,500. See Figure 6.

Much of the increase in pending cases is due to the dramatic increase in new filings and pending cases against Santander. So far Santander has had 536 cases filed against it, or 24% of the 2,219 cases filed against UBS. Given the relative size of these two firms and similar business models in Puerto Rico, there should be 300 more cases filed against Santander. We expect the trend of increasing cases against Santander to continue into 2019.

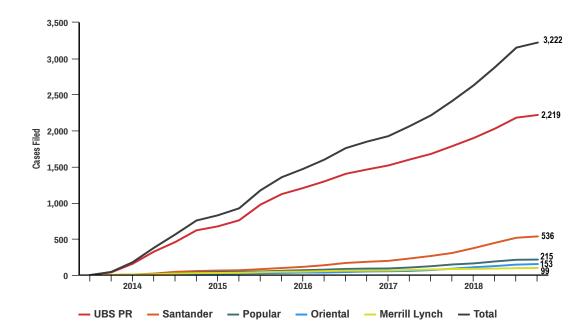


Figure 5: Cases Filed to Date

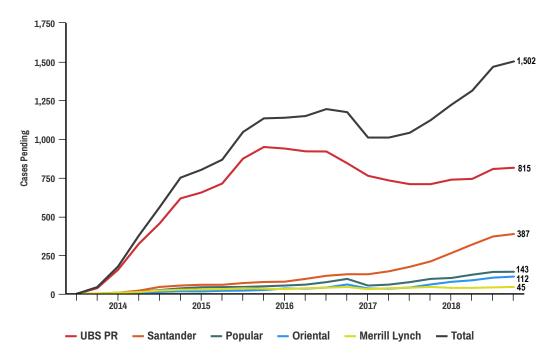


Figure 6: Cases Pending to Date

Methodology and Data

We identify arbitration filings and settlements by examining the Broker-Check reports of brokers registered with UBS PR, Santander, Popular, Oriental and Merrill Lynch at any time between 2005 and 2013. We assign arbitration filings found on the brokers' Broker-Check reports according to a field which identifies the employing firm where the complained of conduct occurred. For example, if a current Santander broker has an arbitration filing listed on her BrokerCheck report that specifies UBS PR as the firm where the conduct occurred we assign that filing to UBS PR not Santander.

We found 4,496 arbitrations filed after September 30, 2013 on 332 individual brokers' BrokerCheck reports. After eliminating duplicates, 3,322 unique arbitrations were reported on at least one broker's BrokerCheck report as having been filed against the five Puerto Rico brokerage firms between October 1, 2013 and November 15, 2018.

Since brokerage firms associate most but not all arbitration filings with one or more individual brokers and only arbitrations resulting in a customer award at final hearing are reflected on brokerage firms' BrokerCheck reports, our results may underestimate the actual number of cases filed, settled or still pending.

Figure 7: Vast Majority of Filings against UBS

800 600 400 200 Settlements Pending New Filings

In addition, brokerage firms appear to have considerable discretion when reporting dollar values of individual settlements and awards. For instance, we observe settlements and awards where Claimants receive large cash payments and are absolved of debit balances created as a result of investment losses complained about and which Respondents seek to collect. Claimants' counsel is typically compensated for debit balances zeroed out and logically these nullified debit balances should be included in the disclosed monetary compensation paid but are not.

FINRA and the brokerage firms have information which would reflect additional filings and settlements and higher dollar figures than we can estimate from individual brokers' BrokerCheck reports. The industry could disclose precisely how many cases have been filed against a firm in Puerto Rico and how much has been paid to settle the cases but does not disclose this information.

We develop our lower bound estimate of the number of cases filed, settled or pending by building up from cases identified on brokers' BrokerCheck reports because brokerage firms' BrokerCheck reports are uninformative. For example, UBS PR's BrokerCheck report (available at https://files.brokercheck.finra.org/ firm/firm 13042.pdf) includes only 36 cases filed since October 1, 2013 even though at least 2,219 arbitrations have been filed against UBS PR since that date. These 36 cases are only the cases

which have gone to a final hearing and which UBS PR reported having lost by November 15, 2018. FINRA does not report the remaining 2,183 arbitrations filed against UBS PR on UBS PR's BrokerCheck report.

Brokers are not named in the vast majority of arbitrations filings; in most cases customers sue only their brokerage firm - UBS PR, Santander, Popular, Oriental and Merrill Lynch in the case of recent Puerto Rico securities arbitrations. Brokers rarely make any contribution to the payments. Brokers contributed to only 0.12% (2 of 1,617) of the settlements identified in Table 1, and only 0.011% (\$47,178) of the \$421.2 million in settlements.

Despite not being named in the arbitrations and not contributing to the settlements, the 1,617 settled cases filed since October 1, 2013 are reported on the brokers' BrokerCheck reports but missing from the BrokerCheck reports of the brokerage firms actually being sued - UBS PR, Santander, Popular, Oriental and Merrill Lynch.

FINRA applies the same perverse logic to pending cases. The 1,502 pending cases we identified are all listed on at least one individual broker's Broker-Check report vet all are missing from the BrokerCheck reports of UBS PR, Santander, Popular, Oriental and Merrill Lynch.

In sum, there have been at least 3,222 arbitrations filed against UBS PR, Santander, Popular, Oriental and Merrill Lynch in Puerto Rico but only 41 show up on these five firms' Broker-Check reports despite the lawsuits being virtually all filed only against the brokerage firms; all but 10 cases where the customer lost at a final hearing on the other hand are on the individual brokers' BrokerCheck reports despite the fact the brokers were not sued and were not contributing to the settlements.

UBS Financial Services, Inc. of Puerto Rico

There are 387 brokers registered with UBS PR at some point in time between 2005 and 2013. 192 of these brokers have at least one customer complaint against UBS PR on their BrokerCheck reports filed on or after October 1, 2013.³ The total number of customer

complaints against UBS PR reported on these brokers' BrokerCheck reports is 3,327. Removing duplicates, we find that there are 2,218 customer-related arbitrations reported on individual brokers' BrokerCheck reports as filed against UBS PR between October 1, 2013 and November 15, 2018. UBS PR has paid at least \$353.1 million settling 1,329 filings as of November 15, 2018. 40 have gone to a final hearing and at least 815 are still pending with many more being filed each quarter. See Table 3.

					Number	Monetary Results			
		Filed	Settled	Arbit	rated	Withdrawn	Pending	Settlements	Awards
				Win	Loss				
2013	Q1	37					37		
Subtotal		37							
2014	Q1	119					156		
	Q2	168					324		
	Q3	133	1				456	\$165,050	
	Q4	163	2				617	\$132,000	
Subtotal		583	3					\$297,050	
2015	Q1	55	17				655	\$8,738,500	
	Q2	84	23	2		1	713	\$7,406,782	\$1,200,000
	Q3	217	51	4	1		874	\$9,991,025	\$6,611,486
	Q4	146	64	3		4	949	\$16,172,239	\$2,304,099

5

2

11

5

1

19

1

2

1

4

2

1

8

34

939

921

920

844

763

733

709

709

738

743

807

815

815

\$42,308,546

\$19,516,215

\$16,268,703

\$18,549,635

\$24,671,179

\$79,005,732

\$43,795,586

\$31,909,055

\$35,979,000

\$23,976,433

\$135,660,073

\$25,024,277

\$30,312,622

\$33,294,787

\$7,195,474

\$95,827,160

\$353,098,562

\$10,115,585

\$3,132,588

\$395,197

\$1,250,000

\$20,570,976

\$25,348,761

\$32,980,296

\$33,846,974

\$2,924,970

\$4,895,947

\$19,567,481

\$27,938,398

\$97,249,718

\$550,000

\$866,678

Arbitrations Against UBS Financial Services, Inc. of Puerto Rico

Table 3: Securities Arbitrations filed against UBS

Subtotal

2016

Subtotal

Subtotal

Subtotal

To Date

2018

2017

502

84

92

105

60

341

56

82

78

108

324

112

131

151

37

431

2,218

Q1

Q2

Q3

Q4

Q1

Q2

Q3

Q4

Q1

02

Q3

Q4

155

87

97

99

131

414

131

110

101

108

450

78

120

83

26

307

1,329

9

4

1

2

4

11

5

2

7

4

1

2

2

9

36

1

1

2

1

1

4

Santander Securities LLC

There are 225 brokers who were registered with Santander Securities LLC at some time between 2005 and 2013 and had an office in Puerto Rico. 60 of these brokers have at least one customer complaint against Santander on their BrokerCheck reports filed on or after October 1, 2013. The total number of customer complaints against Santander

reported on these brokers' BrokerCheck reports is 765. Eliminating duplicates, we find that there are 536 customer-related arbitrations reported on individual brokers' BrokerCheck reports as filed against Santander Securities LLC between October 1, 2013 and November 15, 2018.

Santander has paid \$47.5 million settling 143 of them as of November 15, 2018. 3 have gone to a final hearing and 387 are still pending with many more being filed each quarter.

Table 4: Securities Arbitrations filed against Santander Securities

		Arbitrations Against Santander Securities LLC													
					Number	•		Monetary Re	esults						
		Filed	Settled	Arbi	trated	Withdrawn	Pending	Settlements	Awards						
				Win	Loss										
2013	Q4	2					2								
Subtotal		2													
2014	Q1	6					8								
	Q2	13					21								
	Q3	24					45								
	Q4	11	2				54	\$211,000							
Subtotal		54	2					\$211,000							
2015	Q1	7	1	1			59	\$120,000	\$17,500						
	Q2	4	4				59	\$1,029,103	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,						
	Q3	15	4				70	\$465,000							
	Q4	16	9				77	\$1,190,000							
Subtotal		42	18	1				\$2,804,103	\$17,500						
2016	Q1	16	14				79	\$2,483,750							
	Q2	23	3		1	1	97	\$407,500							
	Q3	31	11				117	\$1,421,500							
	Q4	16	6				127	\$1,725,000							
Subtotal		86	34		1	1		\$6,037,750							
2017	Q1	13	13				127	\$5,039,000							
2017	Q2	33	13			1	146	\$3,392,063							
	Q3	35	6			1	175	\$7,166,000							
	Q4	42	7				210	\$875,000							
Subtotal		123	39			1	210	\$16,472,063							
2018	Q1	67	13				264	\$7,0811,000							
	Q2	73	17			1	319	\$8,230,000							
	Q3	70	18				371	\$5,982,924							
	Q4	19	2		1		387	\$658,075							
Subtotal		229	50		1	1		\$21,951,999							
To Data		E26	142	1	2	2	397	\$47,476,015	¢17.500						
To Date		536	143	1	2	3	387	\$47,476,915	\$17,500						

Arbitrations Against Santander Securities IIC

Popular Securities, LLC

There are 235 brokers who were registered with Popular at some time between 2005 and 2013 and had an office in Puerto Rico. 58 of these brokers have at least one customer complaint against Popular on their BrokerCheck reports filed on or after October 1, 2013. The total number of customer complaints

against Popular reported on these brokers' BrokerCheck reports is 341. Eliminating duplicates, we find that there are 215 customer-related arbitrations reported on individual brokers' BrokerCheck reports as filed against Popular between October 1, 2013 and November 15, 2018. Popular has paid \$7.9 million settling 58 of the customer complaints as of November 15, 2018. 4 has gone to a final hearing and 143 are still pending.

	Arbitrations Against Popular Securities LLC													
				Monetary	Results									
		Filed	Settled	Arbi	trated	Withdrawn	Pending	Settlements	Awards					
				Win	Loss									
2013	Q4	1					1							
Subtotal		1												
2014	Q1	1					2							
	Q2	11					13							
	Q3	12					25	\$41,052						
	Q4	11					36	\$57,118						
Subtotal		35						\$98,170						
2015	Q1	7					43							
	Q2	1					44							
	Q3	6	5				45	\$239,450						
	Q4	10	4		1	1	49	\$302,500						
Subtotal		24	9		1	1		\$541,950						
2016	Q1	8	2			1	54	\$62,500						
	Q2	7	4				57	\$374,000						
	Q3	10	7	1			59	\$498,000	\$354,856					
	Q4	5	3			2	59	\$205,000						
Subtotal		30	16	1		3		\$1,139,500	\$354,856					
2017	Q1	2	7				54	\$479,481						
	Q2	13	7				60	\$668,000						
	Q3	18	1			1	76	\$215,000						
	Q4	24	3				97	\$172,500						
Subtotal		57	18			1		\$1,534,981						
2018	Q1	15	7	1		1	103	\$2,080,000	\$250,000					
	Q2	27	3			3	124	\$1,005,000						
	Q3	23	4			1	142	\$1,420,000						
	Q4	3	1	1			143	\$125,000	\$173,537					
Subtotal		68	15	2		5		\$4,630,000	\$423,537					
To Date		215	58	3	1	10	143	\$7,944,601	\$778,393					

Table 5: Securities Arbitrations files against Popular Securities

Merrill Lynch, Pierce, Fenner & Smith Inc. ("Merrill Lynch")

There are 69 brokers who were registered with Merrill Lynch at some time between 2005 and 2013 and had an office in Puerto Rico. 32 of these brokers have at least one customer complaint against Merrill Lynch on their Broker-Check reports filed on or after October 1, 2013. The total number of customer complaints against Merrill Lynch reported on these brokers' BrokerCheck reports is 125. Eliminating duplicates, we find that there are 99 customer-related arbitrations reported on individual brokers' BrokerCheck reports as against Merrill Lynch filed between October 1, 2013 and November 15, 2018.

Merrill Lynch has paid \$7.8 million settling 50 of them as of November 15, 2018. One has gone to a final hearing, 3 were withdrawn and 45 were still pending as of November 15, 2018.

Table 6: Securities Arbitrtions filed against Merrill Lynch

Arbitrations Against Merrill Lynch													
				Monetary Re	sults								
		Filed	Settled	Arbi	trated	Withdrawn	Pending	Settlements	Awards				
				Win	Loss								
2013	Q4	3					3						
Subtotal		3											
2014	Q1	5					8	\$232,232					
	Q2	4					12						
	Q3	10					22						
	Q4	5					27						
Subtotal		24						\$232,232					
2015	Q1	2					29						
	Q2	3	1				31	\$298,000					
	Q3	8	3				36	\$1,880,000					
	Q4	6	8				34	\$948,497					
Subtotal		19	12					\$3,126,497					
2016	Q1	2	4			1	31	\$172,500					
	Q2	7	4			1	33	\$259,000					
	Q3	6	2				37	\$95,000					
	Q4	1	4				34	\$591,550					
Subtotal		16	14			2		\$1,118,050					
2017	Q1	2	5				31	\$902,500					
	Q2	7	1				37	\$40,000					
	Q3	7	4				40	\$180,000					
	Q4	6	1				45	\$75,000					
Subtotal		22	11					\$1,197,500					
2018	Q1	2	6		1	1	39	\$875,000					
	Q2	4	4				39	\$335,000					
	Q3	6	3				42	\$915,000					
	Q4	3					45						
Subtotal		15	13		1	1		\$2,125,000					
To Date		99	50	0	1	3	45	\$7,799,279					

Oriental Financial Services Corp

There are 132 brokers who were registered with Oriental at some time between 2005 and 2013 and had an office in Puerto Rico. 30 of these brokers have at least one customer complaint against Oriental on their BrokerCheck reports filed on or after October 1, 2013. The total number of customer complaints

against Oriental reported on these brokers' BrokerCheck reports is 196. Eliminating duplicates, we find that there are 153 customer-related arbitrations reported on individual brokers' Broker-Check reports as against Oriental filed between October 1, 2013 and November 15, 2018.

Oriental has paid \$3.5 million settling 36 of the customer complaints as of November 15, 2018. Three have gone to a final hearing and 112 are still pending.

Table 7: Securities Arbitrations filed against Oriental Financial Services

	Arbitrations Against Oriental Financial Services Corp.													
			Monetary											
		Filed	Settled	Arbit	rated	Withdrawn	Pending	Settlements	Awards					
			ĺ	Win	Loss									
2013	Q4	1					1							
Subtotal		1												
2014	Q1	2					3							
	Q2	4					7							
	Q3	6					13							
	Q4	4					17							
Subtotal		16												
2015	Q1	1	1		1		16	\$63,000						
	Q2	5	1				20							
	Q3	3	2				21	\$57,500						
	Q4	4					25	\$10,534						
Subtotal		13	4		1			\$131,034						
	İ			İ										
2016	Q1	5	2				28	\$155,500						
	Q2	0	2				26	\$247,500						
	Q3	7	4				29	\$108,000						
	Q4	8	2				35	\$60,000						
Subtotal		20	10					\$571,000						
2017	Q1	3	1	1		1	35	\$35,000	\$808,000					
	Q2	4	4		1		34	\$555,000						
	Q3	12	5				41	\$467,500						
	Q4	20					61							
Subtotal		39	10	1	1	1		\$1,057,500	\$808,000					
					Ì									
2018	Q1	20	3				78	\$157,000						
	Q2	16	5		İ	1	88	\$531,500						
	Q3	20	3				105	\$995,000						
	Q4	8	1		Ì		112	\$45,000						
Subtotal		64	12			1		\$1,728,500						
To Date		153	36	1	2	2	112	\$3,488,034	\$808,000					

Endnotes

- 1. © Securities Litigation and Consulting Group, Inc, 2018. The primary authors of this report are Craig McCann, Edward O'Neal, Chuan Qin and Mike Yan.
- 2. The numbers reported in the text and tables are based on BrokerCheck reports downloaded on November 15, 2018.
- 3. A customer complaint is a "Customer Dispute" event with status "Settled", "Pending", or "Award/ Judgment" as disclosed on a broker's BrokerCheck report.