

Who Diligences the Disclosures?



John Tishler
Sheppard Mullin



Robert Cornish
Phillips Lytle



Clem Turner
Homeier & Law



John Leo
Primary Capital



Rupy Cheema
EB5 Diligence



Kurt Reuss
Primary Capital

PRESENTED BY:



PRIMARY CAPITAL

SEC Rule 10b-5

It shall be unlawful for any person, directly or indirectly, by use of any means to:

- make any untrue statement of a material fact.
- omit to state a material fact necessary ... to make statements ... not misleading.
- to engage in any act ... which would operate as a fraud or deceit upon any person in connection with the purchase or sale of any security.

FINRA Rule 2111 - Suitability

A firm or associated person must have a reasonable basis to believe that a recommended transaction involving a security is suitable for the customer, based on the information obtained through reasonable diligence.