



IAPD Report

CLEMENT MICHAEL BORKOWSKI

CRD# 3235468

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Please contact FINRA with any concerns.



IAPD Information About Representatives

IAPD offers information on all current-and many former representatives. Investors are strongly encouraged to use IAPD to check the background of representatives before deciding to conduct, or continue to conduct, business with them.

What is included in a IAPD report?

IAPD reports for individual representatives include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards.

It is important to note that the information contained in an IAPD report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

Where did this information come from?

The information contained in IAPD comes from the Investment Adviser Registration Depository (IARD) and FINRA's Central Registration Depository, or CRD, (see more on CRD below) and is a combination of:

- information the states require representatives and firms to submit as part of the registration and licensing process, and
- information that state regulators report regarding disciplinary actions or allegations against representatives.

How current is this information?

Generally, representatives are required to update their professional and disciplinary information in IARD within 30 days.

Need help interpreting this report?

For help understanding how to read this report, please consult NASAA's IAPD Tips page <http://www.nasaa.org/IAPD/IARReports.cfm>

What if I want to check the background of an Individual Broker or Brokerage Firm?

To check the background of an Individual Broker or Brokerage firm, you can search for the firm or individual in IAPD. If your search is successful, click on the link provided to view the available licensing and registration information in FINRA's BrokerCheck website.

Are there other resources I can use to check the background of investment professionals?

It is recommended that you learn as much as possible about an individual representative or Investment Adviser firm before deciding to work with them. Your state securities regulator can help you research individuals and certain firms doing business in your state. The contact information for state securities regulators can be found on the website of the North American Securities Administrators Association <http://www.nasaa.org>



Report Summary

CLEMENT MICHAEL BORKOWSKI (CRD# 3235468)

The report summary provides an overview of the representative's professional background and conduct. The information contained in this report has been provided by the representative, investment adviser and/or securities firms, and/or securities regulators as part of the states' investment adviser registration and licensing process. The information contained in this report was last updated by the representative, a previous employing firm, or a securities regulator on **03/14/2024**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	SKIHAWK CAPITAL PARTNERS, LLC	CRD# 153433	01/13/2020

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **1** jurisdiction(s).

Is this representative currently Inactive or Suspended with any regulator? **No**

Note: Not all jurisdictions require IAR registration or may have an exemption from registration.

Additional information including this individual's qualification examinations and professional designations is available in the Detailed Report.

REGISTRATION HISTORY

This representative was previously registered with the following firm(s):

	FIRM	CRD#	LOCATION	REGISTRATION DATES
IA	SKIHAWK CAPITAL PARTNERS, LLC	153433	COLORADO SPRINGS, CO	01/03/2011 - 12/31/2019
B	WORLD GROUP SECURITIES, INC.	114473	DULUTH, GA	04/12/2002 - 03/18/2004
B	WMA SECURITIES, INC.	32625	DULUTH, GA	06/09/1999 - 04/12/2002

For additional registration and employment history details as reported by the individual, refer to the Registration and Employment History section of the Detailed Report.

DISCLOSURE INFORMATION

Disclosure events include certain criminal charges and convictions, formal investigations and disciplinary actions initiated by regulators, customer disputes and arbitrations, and financial disclosures such as bankruptcies and unpaid judgments or liens.

Are there events disclosed about this representative? **Yes**

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1



Qualifications

REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works. This individual is currently registered with **1** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **SKIHAWK CAPITAL PARTNERS, LLC**
Main Address: 6547 N. ACADEMY BLVD
#137
COLORADO SPRINGS, CO 80918
Firm ID#: 153433

Regulator	Registration	Status	Date
IA Colorado	Investment Adviser Representative	Approved	01/13/2020

Branch Office Locations

SKIHAWK CAPITAL PARTNERS, LLC
6547 N. ACADEMY BLVD
#137
COLORADO SPRINGS, CO 80918

SKIHAWK CAPITAL PARTNERS, LLC
295 Palmas Inn Way
Ste 104 PMB 168
Humacao, PR 00791



Qualifications

PASSED INDUSTRY EXAMS

This section includes all industry exams that the representative has passed. Under limited circumstances, a representative may attain registration after receiving an exam waiver based on a combination of exams the representative has passed and qualifying work experience. Likewise a new exam requirement may be grandfathered based on a representative's specific qualifying work experience. Exam waivers and grandfathering are not included below.

This individual has passed 1 principal/supervisory exam, 1 general industry/product exam, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
B Investment Company Products/Variable Contracts Principal Examination (S26)	Series 26	03/04/2003

General Industry/Product Exams

Exam	Category	Date
B Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	06/08/1999

State Securities Law Exams

Exam	Category	Date
IA Uniform Investment Adviser Law Examination (S65)	Series 65	05/07/2010
B Uniform Securities Agent State Law Examination (S63)	Series 63	06/08/1999

PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **0** professional designation(s).

No information reported.



Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
IA	01/03/2011 - 12/31/2019	SKIHAWK CAPITAL PARTNERS, LLC	CRD# 153433	COLORADO SPRINGS, CO
B	04/12/2002 - 03/18/2004	WORLD GROUP SECURITIES, INC.	CRD# 114473	DULUTH, GA
B	06/09/1999 - 04/12/2002	WMA SECURITIES, INC.	CRD# 32625	DULUTH, GA

EMPLOYMENT HISTORY

Below is the representative's employment history for up to the last 10 years.

Employment Dates	Employer Name	Position	Investment Related	Employer Location
09/2018 - Present	THE CONVERGENCE GROUP	PRESIDENT/DIRECTOR	Y	COLORADO SPRINGS, CO, United States
07/2009 - Present	SKIHAWK CAPITAL PARTNERS, LLC	PARTNER/CCO	Y	COLORADO SPRINGS, CO, United States
04/2004 - 12/2019	SKIHAWK FINANCIAL, INC.	President/Principal	Y	COLORADO SPRINGS, CO, United States
07/2012 - 01/2019	ASI Capital, LLC	Managing Member	Y	Colorado Springs, CO, United States

OTHER BUSINESS ACTIVITIES

This section includes information, if any, as provided by the representative regarding other business activities the representative is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent, or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious, or fraternal and is recognized as tax exempt.

ASI Capital, LLC

ASI Capital, LLC ("ASIC") is an alternative asset pooled investment vehicle. ASIC is closed to new investors. SkiHawk Capital provides investment management as the investment advisor. The principals of SkiHawk Capital also hold a direct ownership interest in ASIC. ASIC offers investors an advantage with its actively managed pool of direct investment assets. Investors receive fixed yield return with an uncorrelated pool of alternative assets as collateral. ASIC activities are accounted for in the activities of TCG..

BUPP Holdings, LLC

Mr. Clement M. Borkowski and Mr. Sean A. Hawkins, also own BUPP Holdings, LLC (formerly a dba "PartnersHealth") ("BUPP"). BUPP was a Business development company for healthcare providers (hospitals, surgery centers, etc.). The dba of PartnersHealth and associated activities of BUPP are now provided by The Convergence Group an affiliated company. BUPP currently operates as a holding company only. Mr. Clement M. Borkowski and Mr. Sean A. Hawkins have received compensation



Registration & Employment History



OTHER BUSINESS ACTIVITIES

from BUPP through salary and ownership distributions. This creates a conflict of interest in that the Advisor can earn additional fees from clients by recommending they use the services of this entity. Clients of SkiHawk Capital are not required to invest in BUPP. BUPP has no active business operations.

Season Investments, LLC

Mr. Clement M. Borkowski and Mr. Sean A. Hawkins, Investment Advisor Representative of SkiHawk Capital could also be considered affiliated with Season Investments, LLC through ASIHCP. SkiHawk Capital provides investment management as the investment adviser to ASIHCP and Season Investments, LLC is a sub-adviser, to the ASIHCP fund. SkiHawk Capital receives no compensation from Season Investments, LLC and there is no common ownership between the two firms.

Aegis Group, LLC.

Mr. Clement M. Borkowski and Mr. Sean A. Hawkins, Investment Advisor Representative of SkiHawk Capital ("Owners") are also indirectly minority owners in Aegis Group, LLC ("Aegis"). Aegis is a commercial insurance firm specializing in commercial property, liability, errors & omissions, medical malpractice, and other commercial insurance products. Clients of SkiHawk Capital are not required to use Aegis products. SkiHawk Capital does recommend Aegis to portfolio companies of the pooled investment vehicles and private funds they advise. The Owners are not active participants of Aegis and Aegis is expected to compete in the open market when recommended. These activities take up approximately 1% of the Owners time.

Tower Realty Partners, Ltd ("Tower")

Mr. Clement M. Borkowski and Mr. Sean A. Hawkins, Investment Advisor Representative of SkiHawk Capital indirectly own a minority interest and hold board seats in Tower Realty Partners, Ltd ("Tower"). Tower is a full service commercial real estate brokerage firm. Clients of SkiHawk Capital are not required to use Tower services. SkiHawk Capital has recommended Tower services to portfolio companies of the pooled and private funds SkiHawk Capital advises. These activities take up approximately 1% of our time.



Disclosure Summary

Disclosure Information

What you should know about reported disclosure events:

(1) Certain thresholds must be met before an event is reported to IARD, for example:

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

(2) Disclosure events in IAPD reports come from different sources:

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

(3) There are different statuses and dispositions for disclosure events:

- A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
 - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

(4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.



DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1

Regulatory Event

This disclosure event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a federal regulator such as the Securities and Exchange Commission or the Commodities Futures Trading Commission, or a foreign financial regulatory body) for a violation of investment-related rules or regulations. This disclosure event may also include a revocation or suspension of an Investment Adviser Representative's authority to act as an attorney, accountant or federal contractor.

Disclosure 1 of 1

Reporting Source:	Regulator
Regulatory Action Initiated By:	Colorado Division of Securities
Sanction(s) Sought:	Monetary Penalty other than Fines Rescission
Date Initiated:	03/23/2017
Docket/Case Number:	2017-CDS-008
URL for Regulatory Action:	
Employing firm when activity occurred which led to the regulatory action:	Skihawk Capital Partners, LLC, CRD # 153433
Product Type:	Promissory Note
Allegations:	Borkowski offered and sold unregistered securities; directly or indirectly employed unlicensed sales agents to act as sales representatives, maintained client funds without complying with safeguards provided by rules, and filed or caused to be filed materially misleading Form ADVs.
Current Status:	Final
Resolution:	Stipulation and Consent
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No



Resolution Date: 04/04/2017

Sanctions Ordered: Monetary Penalty other than Fines
Rescission
Other: An offer of recession shall be made to all ASI Capital noteholders who purchased ASI Capital Promissory Notes. The recession process is described in paragraph 8 of the Stipulation For Consent Order that is incorporated in Order No. 17-CDS-008.

Monetary Sanction 1 of 1

Monetary Related Sanction: Monetary Penalty other than Fines

Total Amount: \$50,000.00

Portion Levied against individual: \$50,000.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Regulator Statement Borkowski offered and sold unregistered securities; directly or indirectly employed unlicensed sales agents to act as sales representatives, maintained client funds without complying with safeguards provided by rules, and filed or caused to be filed materially misleading Form ADVs.

Reporting Source: Individual

Regulatory Action Initiated By: Colorado Division of Securities

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

Date Initiated: 03/01/2017

Docket/Case Number: N/A

Employing firm when activity occurred which led to the regulatory action: Skihawk Capital Partners

Product Type: Promissory Note

Allegations: [third party] and Clem Borkowksi, the sole owners of SkiHawk Capital along with ASIC, SkiHawk Capital and SkiHawk Financial, Inc. entered into a Stipulation for Consent Order with the Colorado Division of Securities (the "Division") related to an investigation by the Division into a private offering of promissory notes made in association with the Parties between April of 2012 through May of 2014. The Stipulation, entered into in March of 2017, does not involve any admission of wrongdoing by the Parties; however, the Stipulation and corresponding Consent Order ("Order") do contain certain monetary and non-monetary provisions, including the payment of a \$50,000 fine to the Division.

Current Status: Final

Resolution: Stipulation and Consent



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	03/31/2017
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s)
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$50,000.00
Portion Levied against individual:	\$0.00
Payment Plan:	Firm pays fee
Is Payment Plan Current:	Yes
Date Paid by individual:	03/31/2017
Was any portion of penalty waived?	No
Amount Waived:	



End of Report

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