



IAPD Report

CHRISTIAN EDUARDO DE BERARDINIS

CRD# 4312327

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Qualifications	2 - 3
Registration and Employment History	4 - 5
Disclosure Information	6

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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

CHRISTIAN EDUARDO DE BERARDINIS (CRD# 4312327)

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 **04/01/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	APERTURE ADVISORS LLC	CRD# 327627	01/16/2024

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	MORGAN STANLEY	149777	New York, NY	05/14/2020 - 07/20/2023
B	MORGAN STANLEY	149777	New York, NY	07/20/2015 - 07/20/2023
B	J.P. MORGAN SECURITIES LLC	79	MIAMI, FL	07/12/2011 - 08/05/2015

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
Customer Dispute	1
Termination	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: **APERTURE ADVISORS LLC**
Main Address: WEST PALM BEACH, FL
Firm ID#: 327627

Regulator	Registration	Status	Date
IA Florida	Investment Adviser Representative	Approved	01/16/2024

Branch Office Locations

APERTURE ADVISORS LLC
WEST PALM BEACH, FL



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 0 principal/supervisory exams, 2 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams


Exam	Category	Date
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No information reported.

General Industry/Product Exams


Exam	Category	Date
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 Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
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 General Securities Representative Examination (S7)	Series 7	11/24/2001
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State Securities Law Exams

Exam	Category	Date
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 Uniform Investment Adviser Law Examination (S65)	Series 65	11/07/2023
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 Uniform Securities Agent State Law Examination (S63)	Series 63	04/11/2002
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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	05/14/2020 - 07/20/2023	MORGAN STANLEY	CRD# 149777	New York, NY
B	07/20/2015 - 07/20/2023	MORGAN STANLEY	CRD# 149777	New York, NY
B	07/12/2011 - 08/05/2015	J.P. MORGAN SECURITIES LLC	CRD# 79	MIAMI, FL
B	04/06/2010 - 06/29/2011	PHOENIX DERIVATIVES GROUP, LLC	CRD# 25802	NEW YORK, NY
B	07/01/2008 - 04/16/2010	OPPENHEIMER & CO. INC.	CRD# 249	NEW YORK, NY
B	05/18/2005 - 08/04/2008	J.P. MORGAN SECURITIES INC.	CRD# 18718	NEW YORK, NY
B	05/20/2003 - 05/17/2005	CITIGROUP GLOBAL MARKETS INC.	CRD# 7059	NEW YORK, NY
B	11/26/2001 - 05/20/2003	BANC OF AMERICA SECURITIES LLC	CRD# 26091	NEW YORK, NY

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
09/2023 - Present	Aperture Advisors LLC	Investment Adviser Representative	Y	West Palm Beach, FL, United States
08/2023 - Present	Aperture Advisors LLC	Managing Partner	Y	Greenwich, CT, United States
07/2015 - 07/2023	MORGAN STANLEY	FIRST VICE PRESIDENT	Y	NEW YORK, NY, United States
07/2015 - 07/2023	MORGAN STANLEY PRIVATE BANK, NATIONAL ASSOCIATION	VICE PRESIDENT	Y	NEW YORK, NY, United States



Registration & Employment History



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.

No information reported.



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
Customer Dispute	1
Termination	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:	FINRA
Sanction(s) Sought:	
Date Initiated:	09/19/2024
Docket/Case Number:	2023079207702
Employing firm when activity occurred which led to the regulatory action:	Morgan Stanley
Product Type:	Direct Investment-DPP & LP Interests
Allegations:	Without admitting or denying the findings, De Berardinis consented to the sanctions and to the entry of findings that he participated in private offerings of securities that raised \$2.45 million from customers of his member firm without providing prior written notice to or receiving approval from his firm. The findings stated that De Berardinis introduced the firm customers to the CEO of a dairy company and recommended that they invest in the company. De Berardinis also facilitated the customers' investments by providing them with information about the investment. In some cases, De Berardinis assisted customers with paperwork and, at his customers' requests, transferred funds from the customers' firm accounts to the company to fund their investments. De Berardinis received \$22,500 from the company in referral fees. De Berardinis also falsely responded to questions about whether he had participated in private securities transactions on annual firm compliance questionnaires.
Current Status:	Final



Resolution:	Acceptance, Waiver & Consent(AWC)
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:	09/19/2024
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Disgorgement Suspension Other: plus interest
If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?	No
(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?	
(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or	



(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Sanction 1 of 1

Sanction Type: Suspension
Capacities Affected: All Capacities
Duration: 24 months
Start Date: 10/07/2024
End Date: 10/06/2026

Monetary Sanction 1 of 2

Monetary Related Sanction: Disgorgement
Total Amount: \$22,500.00
Portion Levied against individual: \$22,500.00
Payment Plan: Deferred, plus Interest
Is Payment Plan Current:
Date Paid by individual:
Was any portion of penalty waived? No

Amount Waived:

Monetary Sanction 2 of 2

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)
Total Amount: \$15,000.00
Portion Levied against individual: \$15,000.00
Payment Plan: Deferred
Is Payment Plan Current:
Date Paid by individual:
Was any portion of penalty waived? No



Amount Waived:

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Reporting Source: Individual
Regulatory Action Initiated By: FINRA
Sanction(s) Sought: Civil and Administrative Penalty(ies)/Fine(s)
Disgorgement
Suspension

Date Initiated: 09/06/2024
Docket/Case Number: 2023079207702

Employing firm when activity occurred which led to the regulatory action: APERTURE ADVISORS LLC

Product Type: No Product

Allegations: Without admitting or denying the findings, De Berardinis consented to the sanctions and to the entry of findings that he participated in private offerings of securities that raised \$2.45 million from customers of his member firm without providing prior written notice to or receiving approval from his firm. The findings stated that De Berardinis introduced the firm customers to the CEO of a dairy company and recommended that they invest in the company. De Berardinis also facilitated the customers' investments by providing them with information about the investment. In some cases, De Berardinis assisted customers with paperwork and, at his customers' requests, transferred funds from the customers' firm accounts to the company to fund their investments. De Berardinis received \$22,500 from the company in referral fees. De Berardinis also falsely responded to questions about whether he had participated in private securities transactions on annual firm compliance questionnaires.

Current Status: Final
Resolution: Acceptance, Waiver & Consent(AWC)

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: 09/19/2024
Sanctions Ordered: Civil and Administrative Penalty(ies)/Fine(s)
Disgorgement
Suspension

Sanction 1 of 1
Sanction Type: Suspension
Capacities Affected: suspension within FINRA's regulatory boundaries
Duration: 24 Months
Start Date: 10/07/2024
End Date: 10/06/2026



Monetary Sanction 1 of 1

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

Total Amount: \$15,000.00

Portion Levied against individual: \$15,000.00

Payment Plan: The fine shall be due and payable either immediately upon reassociation with a member firm

Is Payment Plan Current: Yes

Date Paid by individual: 10/07/2024

Was any portion of penalty waived? No

Amount Waived:



Customer Dispute

This section provides information regarding a customer dispute that was reported to the Investment Adviser Registration Depository (IARD) by the Investment Adviser Representative (IAR), an investment adviser and/or securities firm, and/or a securities regulator. The event may include a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit that contains allegations of sales practice violations against the individual.

The customer dispute may be pending or may have resulted in a civil judgment, arbitration award, monetary settlement, closure without action, withdrawal, dismissal, denial, or other outcome.

Disclosure 1 of 1

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: MORGAN STANLEY SMITH BARNEY

Allegations: Claimants allege, inter alia, the financial advisor solicited outside investment opportunities not authorized from the firm from February 20, 2020 to March 1, 2023

Product Type: Other: Managed / Wrap Account; Non-Broker Dealer Affiliate

Alleged Damages: \$6,500,000.00

Is this an oral complaint? No

Is this a written complaint? No

Is this an arbitration/CFTC reparation or civil litigation? Yes

Arbitration/Reparation forum or court name and location: FINRA

Docket/Case #: 23-00507

Filing date of arbitration/CFTC reparation or civil litigation: 02/28/2023

Customer Complaint Information

Date Complaint Received: 03/01/2023

Complaint Pending? No

Status: Settled

Status Date: 01/17/2024

Settlement Amount: \$1,350,000.00

Individual Contribution Amount: \$0.00

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Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: MORGAN STANLEY SMITH BARNEY

Allegations: Claimant alleged, inter alia, FA solicited outside investment opportunities not authorized by firm - 2021 to 2023

Product Type: Other: Managed/Wrap Accounts; Non-Broker Dealer Affiliate



Alleged Damages: \$0.00
Alleged Damages Amount Explanation (if amount not exact): Unspecified
Is this an oral complaint? No
Is this a written complaint? No
Is this an arbitration/CFTC reparation or civil litigation? Yes
Arbitration/Reparation forum or court name and location: FINRA
Docket/Case #: 23-00507
Filing date of arbitration/CFTC reparation or civil litigation: 02/28/2023

Customer Complaint Information

Date Complaint Received: 03/01/2023
Complaint Pending? Yes
Settlement Amount:
Individual Contribution Amount:



Termination

This disclosure event involves a situation where the Investment Adviser Representative voluntarily resigned, was discharged or was permitted to resign after allegations were made that accused the Investment Adviser Representative of violating investment-related statutes, regulations, rules or industry standards of conduct; fraud or the wrongful taking of property; or failure to supervise in connection with investment-related statutes, regulations, rules or industry standards of conduct.

Disclosure 1 of 1

Reporting Source: Firm
Firm Name: MSWM
Termination Type: Voluntary Resignation
Termination Date: 06/22/2023
Allegations: Allegations of involvement with offers or sales of a security not approved by the firm.
Product Type: Other: Private Placement

Reporting Source: Individual
Firm Name: MORGAN STANLEY
Termination Type: Voluntary Resignation
Termination Date: 07/20/2023
Allegations: Allegations of involvement with offers or sales of a security not approved by the firm.
Product Type: Other: Equity Private (Common)
Broker Statement I resigned to start my own Registered Investment Advisory firm.



End of Report

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