



IAPD Report

JONATHAN Charles PENTA

CRD# 4385853

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

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

JONATHAN Charles PENTA (CRD# 4385853)

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 **11/22/2023**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	EMPIRICAL ASSET MANAGEMENT, LLC	CRD# 155436	01/19/2022

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	SAVIOR WEALTH	299178	WALTHAM, MA	04/24/2019 - 09/09/2021
B	PURSHE KAPLAN STERLING INVESTMENTS	35747	Waltham, MA	08/12/2019 - 10/30/2019
B	UBS FINANCIAL SERVICES INC.	8174	WELLESLEY, MA	03/02/2007 - 05/03/2019

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: **EMPIRICAL ASSET MANAGEMENT, LLC**
Main Address: 57 RIVER STREET
SUITE 301
WELLESLEY, MA 02481
Firm ID#: 155436

Regulator	Registration	Status	Date
IA Massachusetts	Investment Adviser Representative	Approved	01/19/2022

Branch Office Locations

EMPIRICAL ASSET MANAGEMENT, LLC
57 RIVER STREET
SUITE 301
WELLESLEY, MA 02481



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, 3 general industry/product exams, and 1 state securities law exam.




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
 Futures Managed Funds Examination (S31)	Series 31	11/16/2001
 General Securities Representative Examination (S7)	Series 7	09/06/2001

State Securities Law Exams

Exam	Category	Date
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  Uniform Combined State Law Examination (S66)	Series 66	09/25/2001
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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	04/24/2019 - 09/09/2021	SAVIOR WEALTH	CRD# 299178	WALTHAM, MA
B	08/12/2019 - 10/30/2019	PURSHE KAPLAN STERLING INVESTMENTS	CRD# 35747	Waltham, MA
B	03/02/2007 - 05/03/2019	UBS FINANCIAL SERVICES INC.	CRD# 8174	WELLESLEY, MA
IA	03/02/2007 - 05/03/2019	UBS FINANCIAL SERVICES INC.	CRD# 8174	WELLESLEY, MA
IA	09/08/2006 - 03/05/2007	MORGAN STANLEY	CRD# 7556	WELLESLEY, MA
B	09/07/2001 - 03/05/2007	MORGAN STANLEY DW INC.	CRD# 7556	WELLESLEY, MA

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
08/2021 - Present	Empirical Asset Management, LLC d/b/a Penta Wealth Management	Investment Advisor Representative	Y	Wellesley, MA, United States
04/2019 - 08/2021	SAVIOR WEALTH, LLC	INVESTMENT ADVISER REPRESENTATIVE	Y	WALTHAM, MA, United States
08/2019 - 10/2019	Purshe Kaplan Sterling Investments	Registered Representative	Y	Albany, NY, United States
03/2007 - 04/2019	UBS FINANCIAL SERVICES INC	FINANCIAL ADVISOR	Y	WELLESLEY, MA, 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.

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:	Massachusetts
Sanction(s) Sought:	Other: Conditional Registration
Date Initiated:	01/19/2022
Docket/Case Number:	E-2021-0091
URL for Regulatory Action:	
Employing firm when activity occurred which led to the regulatory action:	Empirical Asset Management, LLC
Product Type:	No Product

Allegations: Penta has been the subject of disclosure incidents ("DI"), as reported on the CRD. Penta was informed that he was discharged from UBS Financial Services Inc. on April 8, 2019. Savior Wealth filed a Form U4 on April 23, 2019, electronically signed by Penta, indicating that Penta had never voluntarily resigned, been discharged, or permitted to resign after allegations were made that accused him of violating investment-related statutes, regulations, rules, or industry standards of conduct. Penta's termination was disclosed on May 3, 2019, when UBS Financial Services filed a Uniform Termination Notice For Securities Industry Registration ("Form U5"). On October 18, 2021, the Division sent Penta a subpoena ad testificandum to appear before the Division and give testimony in connection with the Division's review of Penta's Application. On November 30, 2021, Penta provided on-the-record testimony.



Current Status:	Final
Resolution:	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:	01/19/2022
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Undertaking Other: For a period of four (4) years from the date of the entry of the Order, Penta will be supervised on a heightened basis, to include, at a minimum: All Massachusetts client new account forms for clients of Penta must be reviewed and approved by a principal in the Corporate Office; Penta's supervisor must randomly select on a quarterly basis the greater of ten (10), or ten percent (10%), of Penta's Massachusetts client accounts to conduct a review of the transactions effected in those client accounts. If there are less than ten (10) Massachusetts clients, all of Penta's Massachusetts client accounts must be reviewed. All reviews must be undertaken to detect and prevent potential securities violations and be memorialized in writing; Penta's supervisor must surveil Penta's electronic communications on a monthly basis, including email. All reviews must be undertaken to detect and prevent potential securities and firm policy violations and be memorialized in writing; Penta's supervisor must have a face-to-face meeting with Penta, prior to submission of any expense report and reimbursement request, to review and explain all expenses. This review must include, but is not limited to, a review of transactional forms and documents and must be memorialized in writing (the "Expense Review Report"). A copy of the Expense Review Report must be maintained by Penta's supervisor, with a copy placed in Penta's personnel file.
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$5,000.00
Portion Levied against individual:	\$5,000.00
Payment Plan:	
Is Payment Plan Current:	
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	
Regulator Statement	After four (4) years from the entry of the Order, Penta must submit within fifteen (15) days, to the Division an affidavit stating that Penta has fully complied with all conditions of the Order. Conditions placed on registration due to disclosures.
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Reporting Source:	Individual
Regulatory Action Initiated By:	Massachusetts



Sanction(s) Sought:	Other: Conditional Registration
Date Initiated:	01/19/2022
Docket/Case Number:	E-2021-0091
Employing firm when activity occurred which led to the regulatory action:	Empirical Asset Management, LLC
Product Type:	No Product
Allegations:	<p>Penta has been the subject of disclosure incidents ("DI"), as reported on the CRD. Penta was informed that he was discharged from UBS Financial Services Inc. on April 8, 2019. Savior Wealth filed a Form U4 on April 23, 2019, electronically signed by Penta, indicating that Penta had never voluntarily resigned, been discharged, or permitted to resign after allegations were made that accused him of violating investment-related statutes, regulations, rules, or industry standards of conduct. Penta's termination was disclosed on May 3, 2019, when UBS Financial Services filed a Uniform Termination Notice For Securities Industry Registration ("Form U5"). On October 18, 2021, the Division sent Penta a subpoena ad testificandum to appear before the Division and give testimony in connection with the Division's review of Penta's Application. On November 30, 2021, Penta provided on-the-record testimony.</p>
Current Status:	Final
Resolution:	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:	01/19/2022
Sanctions Ordered:	<p>Civil and Administrative Penalty(ies)/Fine(s) Undertaking</p> <p>Other: For a period of four (4) years from the date of the entry of the Order, Penta will be supervised on a heightened basis, to include, at a minimum: All Massachusetts client new account forms for clients of Penta must be reviewed and approved by a principal in the Corporate Office; Penta's supervisor must randomly select on a quarterly basis the greater of ten (10), or ten percent (10%), of Penta's Massachusetts client accounts to conduct a review of the transactions effected in those client accounts. If there are less than ten (10) Massachusetts clients, all of Penta's Massachusetts client accounts must be reviewed. All reviews must be undertaken to detect and prevent potential securities violations and be memorialized in writing; Penta's supervisor must surveil Penta's electronic communications on a monthly basis, including email. All reviews must be undertaken to detect and prevent potential securities and firm policy violations and be memorialized in writing; Penta's supervisor must have a face-to-face meeting with Penta, prior to submission of any expense report and reimbursement request, to review and explain all expenses. This review must include, but is not limited to, a review of transactional forms and documents and must be memorialized in writing (the "Expense Review Report"). A copy of the Expense Review Report must be maintained by Penta's supervisor, with a copy placed in Penta's personnel file.</p>
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)



Total Amount: \$5,000.00

Portion Levied against individual: \$5,000.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Broker Statement

After four (4) years from the entry of the Order, Penta must submit within fifteen (15) days, to the Division an affidavit stating that Penta has fully complied with all conditions of the Order. Conditions placed on registration due to disclosures.



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: UBS Financial Services Inc.

Allegations: Time Frame: December 24, 2015 to May 7, 2019
The client alleges her Financial Advisor did not honestly expose the commission trail fees at the time of purchase of her annuity and was charged an additional 4 percent on top of that as well. The alleged damages are estimated to be in excess of \$5,000.00

Product Type: Other: Variable Annuities

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): Alleged damages estimated to be in excess of \$5,000.00

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation? No

Customer Complaint Information

Date Complaint Received: 05/07/2019

Complaint Pending? No

Status: Denied

Status Date: 07/26/2019

Settlement Amount: \$0.00

Individual Contribution Amount: \$0.00

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: UBS Financial Services Inc.

Allegations: Time Frame: December 24th, 2015 to May 7th 2019 The Client alleges her Financial Advisor did not honestly expose the commission trail fees at the time of purchase of her annuity and was charged an additional 4 percent on top of that as well. The alleged damages are estimated to be in excess of \$5,000.00

Product Type: Other: Variable Annuities



Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): Alleged Damages estimated to be in excess of \$5000.00

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation? No

Customer Complaint Information

Date Complaint Received: 05/07/2019

Complaint Pending? No

Status: Denied

Status Date: 07/26/2019

Settlement Amount: \$0.00

Individual Contribution Amount: \$0.00

Broker Statement

The UBS advisor newly assigned to the account misinformed the customer that there was an upfront sales charge incurred when the customer purchased her annuity. In fact, this particular annuity product did not have any upfront sales charge. Therefore, this was an inaccurate and erroneous complaint, which was denied by UBS, and the customer did not incur any damages.



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: UBS FINANCIAL SERVICES INC

Termination Type: Discharged

Termination Date: 04/08/2019

Allegations: Discharged after firm review found that he violated various firm policies including those related to the sending of client identifying data and "internal use only " documents to his personal email; the improper use of his corporate credit card for non-business related purchases and at an improper venue; and the failure to disclose in a timely manner to the firm an arrest.

Product Type: No Product

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Reporting Source: Individual

Firm Name: UBS FINANCIAL SERVICES INC

Termination Type: Discharged

Termination Date: 04/08/2019

Allegations: Discharged after firm review found that he violated various firm policies including those related to the sending of client identifying data and "internal use only" documents to his personal email; the improper use of his corporate credit card for non-business related purchases and at an improper venue; and the failure to disclose in a timely manner to the firm an arrest.

Product Type: No Product

Broker Statement The policy violations alleged by UBS are disputed by Mr. Penta.



End of Report

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