



## IAPD Report

# JENNA A BROWN

CRD# 5361782

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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

### JENNA A BROWN (CRD# 5361782)

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 **06/15/2023**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	EMPIRIKAL PARTNERS LLC	CRD# 282691	07/17/2023

### 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	LIFEMARK SECURITIES CORP.	16204	Syracuse, NY	04/24/2018 - 09/30/2022
B	LIFEMARK SECURITIES CORP.	16204	Syracuse, NY	04/09/2018 - 09/30/2022
IA	CADARET GRANT & CO INC	10641	LIVERPOOL, NY	01/03/2018 - 02/15/2018

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
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: **EMPIRIKAL PARTNERS LLC**

Main Address: PHOENIX, AZ

Firm ID#: 282691

	Regulator	Registration	Status	Date
IA	New York	Investment Adviser Representative	Approved	07/17/2023

### Branch Office Locations

**EMPIRIKAL PARTNERS LLC**  
SYRACUSE, NY



## 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
<b>B</b> Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
<b>B</b> General Securities Representative Examination (S7)	Series 7	05/07/2012

#### State Securities Law Exams

Exam	Category	Date
<b>IA</b> Uniform Investment Adviser Law Examination (S65)	Series 65	07/15/2023
<b>IA</b> <b>B</b> Uniform Combined State Law Examination (S66)	Series 66	06/30/2012



### 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	04/24/2018 - 09/30/2022	LIFEMARK SECURITIES CORP.	CRD# 16204	Syracuse, NY
B	04/09/2018 - 09/30/2022	LIFEMARK SECURITIES CORP.	CRD# 16204	Syracuse, NY
IA	01/03/2018 - 02/15/2018	CADARET GRANT & CO INC	CRD# 10641	LIVERPOOL, NY
B	08/21/2017 - 02/15/2018	CADARET, GRANT & CO., INC.	CRD# 10641	LIVERPOOL, NY
IA	08/21/2017 - 12/31/2017	CADARET GRANT & CO INC	CRD# 10641	LIVERPOOL, NY
IA	10/09/2014 - 08/22/2017	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	SYRACUSE, NY
B	10/08/2014 - 08/22/2017	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	SYRACUSE, NY
B	10/03/2012 - 09/25/2014	LPL FINANCIAL LLC	CRD# 6413	DEWITT, NY
IA	10/03/2012 - 09/25/2014	LPL FINANCIAL LLC	CRD# 6413	DEWITT, NY
IA	07/20/2012 - 09/28/2012	AXA ADVISORS, LLC	CRD# 6627	SYRACUSE, NY
B	05/09/2012 - 09/28/2012	AXA ADVISORS, LLC	CRD# 6627	SYRACUSE, 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
01/2023 - Present	EMPIRIKAL PARTNERS LLC	INVESTMENT ADVISOR REPRESENTATIVE	Y	PHOENIX, AZ, United States
10/2022 - Present	EMPIRIKAL PARTNERS LLC	ADMINISTRATIVE ASSISTANT	Y	PHOENIX, AZ, United States
04/2017 - Present	SOLE PROPRIETOR	INDEPENDENT INSURANCE AGENT	Y	SYRACUSE, NY, United States



## Registration & Employment History



### EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
04/2018 - 09/2022	LIFEMARK SECURITIES CORP.	REGISTERED REPRESENTATIVE, INVESTMENT ADVISOR REPRESENTATIVE	Y	Rochester, NY, United States
08/2017 - 02/2018	Cadaret, Grant & Co., Inc.	REGISTERED REPRESENTATIVE/INVESTMENT ADVISOR REPRESENTATIVE	Y	Liverpool, NY, United States
02/2015 - 08/2017	BANK OF AMERICA, N.A.	FINANCIAL ADVISOR TRAINEE	Y	SYRACUSE, NY, United States
10/2014 - 08/2017	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	REGISTERED REPRESENTATIVE/INVESTMENT ADVISOR REPRESENTATIVE	Y	SYRACUSE, NY, 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.

INDEPENDENT INSURANCE AGENT / INVESTMENT RELATED / 4787 SETTING SUN TERRACE, SYRACUSE, NY 13215 / START 04/2017 / 15 HOURS/MONTH / 5 HOURS/MONTH DURING SECURITIES TRADING HOURS / SALES AND SERVICE OF LIFE, ACCIDENT AND HEALTH INSURANCE.



## 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
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:** 01/24/2019

**Docket/Case Number:** [2018057513901](#)

**Employing firm when activity occurred which led to the regulatory action:** Cadaret, Grant & Co., Inc.

**Product Type:** Other: investment advisory agreements

**Allegations:** Without admitting or denying the findings, Brown consented to the sanctions and to the entry of findings that she forged signatures on investment advisory agreements. The findings stated that Brown's member firm added her as a joint representative on the customers' brokerage accounts, with the approval of both the other registered representative and the customers. However, in order to add Brown as an advisor on the customers' investment advisory accounts, the firm required that a new investment advisory agreement be executed for each account, with original signatures from Brown, the other registered representative, and the customer. Although the other representatives and the customers in question approved of adding Brown as an advisor on their investment advisory accounts, Brown did not obtain the necessary signatures on some of the investment advisory agreements. Instead, she forged the signatures of customers who lived out of state, without the customers' knowledge or approval, in order to avoid mailing the agreements to the customers for their signature. Brown also forged the other registered representative's signature on investment advisory agreements, without his knowledge or approval, in order to avoid the inconvenience of driving to his



office to obtain his genuine signature. The firm's Advisory Services Department determined that the investment advisory agreements in question submitted by Brown contained forged signatures and, as a result, it did not approve or process the investment advisory agreements.

**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:**

01/24/2019

**Sanctions Ordered:**

Civil and Administrative Penalty(ies)/Fine(s)  
Suspension

**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:** three months  
**Start Date:** 02/19/2019  
**End Date:** 05/18/2019

**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:** 10/17/2019  
**Was any portion of penalty waived?** No

**Amount Waived:**

**Regulator Statement** Fines paid in full on October 17, 2019.

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**Reporting Source:** Individual  
**Regulatory Action Initiated By:** FINRA  
**Sanction(s) Sought:**  
**Date Initiated:** 01/24/2019  
**Docket/Case Number:** [2018057513901](#)



<b>Employing firm when activity occurred which led to the regulatory action:</b>	Caderet, Grant & Co., Inc.
<b>Product Type:</b>	Other: Investment Advisory Agreements
<b>Allegations:</b>	<p>Without admitting or denying the findings, Brown consented to the sanctions and to the entry of findings that she signed as the client on internal investment advisory agreements. The findings stated that Brown's member firm added her as a joint representative on the customers' brokerage accounts, with the approval of both the other registered representative and the customers. However, in order to add Brown as an advisor on the customers' investment advisory accounts, the firm required that a new investment advisory agreement be executed for each account, with original signatures from Brown, the other registered representative, and the customer. Although the other representatives and the customers in question approved of adding Brown as an advisor on their investment advisory accounts, Brown did not obtain the necessary signatures on some of the investment advisory agreements. Instead, she signed the signatures of customers who lived out of state, without the customers' knowledge or approval, in order to avoid mailing the agreements to the customers for their signature. Brown also signed the signature of the other registered representative on the same investment advisory agreements, without his knowledge or approval, in order to avoid the inconvenience of driving to his office to obtain his genuine signature. The firm's Advisory Services Department determined that the investment advisory agreements in question submitted by Brown contained forged signatures and, as a result, it did not approve or process the investment advisory agreements.</p>
<b>Current Status:</b>	Final
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	01/24/2019
<b>Sanctions Ordered:</b>	Civil and Administrative Penalty(ies)/Fine(s) Suspension
<b>Sanction 1 of 1</b>	
<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	All Capacities
<b>Duration:</b>	3 months
<b>Start Date:</b>	02/19/2019
<b>End Date:</b>	05/19/2019
<b>Monetary Sanction 1 of 1</b>	
<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$5,000.00
<b>Portion Levied against individual:</b>	\$5,000.00
<b>Payment Plan:</b>	



**Is Payment Plan Current:**

**Date Paid by individual:**

**Was any portion of penalty waived?** No

**Amount Waived:**

**Broker Statement**

The documents in question were internal administrative Cadaret Grant forms that related solely to the division of income between myself and my business partner. When my partner and I transferred our practice from Merrill Lynch to Cadaret Grant in August 2017, for business reasons we placed all of our clients under his individual production code used for tracking income. In January 2018 my partner and I decided to transfer the clients to a joint production code to reflect that we shared the income we earned from serving our clients. To effectuate that transfer, our clients needed to sign a form. In most cases, I was able to obtain the clients' signatures. However, I could not reach a few clients to obtain their signatures either because they were traveling or were otherwise difficult to contact. In those few instances I signed the clients' signatures on the paperwork reassigning them to the joint production code. While this was done purely as a convenience for the clients involved and I greatly regret my mistake, the forms I signed on their behalf related to a purely internal administrative issue at Cadaret Grant, since it concerned how my partner and I agreed to share the income we earned by serving our clients. The paperwork did not relate to the clients' investments, trading activity, or any sales practice matters and did not create a compliance risk for my firm.



## 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:** Cadaret, Grant & Co., Inc.

**Termination Type:** Discharged

**Termination Date:** 02/15/2018

**Allegations:** Brown self executed client signatures to investment advisory agreements in place of obtaining their signature in violation of the firm's policy and procedures and FINRA Rule 2010. No customers were harmed as the investment advisory agreements were never processed.

**Product Type:** Other: Investment advisory agreements

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**Reporting Source:** Individual

**Firm Name:** Cadaret, Grant & Co., Inc.

**Termination Type:** Discharged

**Termination Date:** 02/15/2018

**Allegations:** Rep self executed client signatures to investment advisory agreements in place of obtaining their signature in violation of the firm's policy and procedures and FINRA Rule 2010. No customers were harmed as the investment advisory agreements were never processed.

**Product Type:** Other: investment advisory agreements

**Broker Statement**

The documents in question were internal administrative Cadaret Grant forms that related solely to the division of income between myself and my business partner. When my partner and I transferred our practice from Merrill Lynch to Cadaret Grant in August 2017, for business reasons we placed all of our clients under his individual production code used for tracking income. In January 2018 my partner and I decided to transfer the clients to a joint production code to reflect that we shared the income we earned from serving our clients. To effectuate that transfer, our clients needed to sign a form. In most cases, I was able to obtain the clients' signatures. However, I could not reach a few clients to obtain their signatures either because they were traveling or were otherwise difficult to contact. In those few instances I signed the clients' signatures on the paperwork reassigning them to the joint production code. While this was done purely as a convenience for the clients involved and I greatly regret my mistake, the forms I signed on their behalf related to a purely internal administrative issue at Cadaret Grant, since it concerned how my partner and I agreed to share the income we earned by serving our clients. The paperwork did not relate to the clients' investments, trading activity, or any sales practice matters and did not create a compliance risk for my firm.



## End of Report

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