



## IAPD Report

# BRIAN RICHARD GAISTER

CRD# 5394236

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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

### BRIAN RICHARD GAISTER (CRD# 5394236)

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 **06/26/2024**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	PENNINGTON PARTNERS & CO., LLC	CRD# 282688	06/28/2024

### 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	PENNINGTON PARTNERS & CO., LLC	282688	Houston, TX	01/09/2017 - 01/06/2024
IA	PENNINGTON PARTNERS & CO., LLC	282688	BETHESDA, MD	05/18/2016 - 12/31/2016
B	PRIVATE CLIENT SERVICES, LLC	120222	Washington, DC	01/26/2016 - 04/04/2016

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
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: **PENNINGTON PARTNERS & CO., LLC**  
Main Address: 7500 OLD GEORGETOWN ROAD  
SUITE 705  
BETHESDA, MD 20814  
Firm ID#: 282688

	Regulator	Registration	Status	Date
	Texas	Investment Adviser Representative	Approved	06/28/2024

#### Branch Office Locations

**PENNINGTON PARTNERS & CO., LLC**  
1400 Post Oak Blvd  
Suite 625  
Houston, TX 77056



## 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
<b>B</b> Securities Industry Essentials Examination (SIE)	SIE	04/04/2016
<b>B</b> Futures Managed Funds Examination (S31)	Series 31	11/09/2007
<b>B</b> General Securities Representative Examination (S7)	Series 7	09/04/2007

#### State Securities Law Exams

Exam	Category	Date
<b>IA</b> <b>B</b> Uniform Combined State Law Examination (S66)	Series 66	12/11/2007



### 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	01/09/2017 - 01/06/2024	PENNINGTON PARTNERS & CO., LLC	CRD# 282688	Houston, TX
IA	05/18/2016 - 12/31/2016	PENNINGTON PARTNERS & CO., LLC	CRD# 282688	BETHESDA, MD
B	01/26/2016 - 04/04/2016	PRIVATE CLIENT SERVICES, LLC	CRD# 120222	Washington, DC
B	09/10/2010 - 11/24/2015	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	COLUMBIA, MD
IA	09/10/2010 - 11/24/2015	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	COLUMBIA, MD
B	06/01/2009 - 09/16/2010	MORGAN STANLEY SMITH BARNEY	CRD# 149777	BALTIMORE, MD
IA	06/01/2009 - 09/16/2010	MORGAN STANLEY SMITH BARNEY LLC	CRD# 149777	BALTIMORE, MD
IA	12/12/2007 - 06/01/2009	MORGAN STANLEY & CO. INCORPORATED	CRD# 8209	BALTIMORE, MD
B	09/06/2007 - 06/01/2009	MORGAN STANLEY & CO. INCORPORATED	CRD# 8209	BALTIMORE, MD

### 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
03/2016 - Present	PENNINGTON PARTNERS & CO., LLC	investment adviser/founding partner	Y	Bethesda, MD, United States
01/2016 - 03/2016	Private Client Services, LLC	Registered Rep	Y	Louisville, KY, 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.

I.

1.FOR PROFIT OR NOT FOR PROFIT: FOR-PROFIT ORGANIZATION  
2.NAME OF OUTSIDE BUSINESS ORGANIZATION: KEIRETSU FORUM  
3.INVESTMENT RELATED: N  
4.ADDRESS OF BUSINESS:  
425 MARKET STREET,  
SAN FRANCISCO, CALIFORNIA 94105  
5.NATURE OF BUSINESS: LLC,  
6.COMPENSATION FOR ACTIVITY: N  
7.POSITION, TITLE, ASSOCIATION: PARTICIPANT,  
8.START DATE OF RELATIONSHIP: 6/1/2012  
9.NUMBER OF HOURS DEVOTED: 5 HOUR(S) MONTHLY  
10.NUMBER OF HOURS DEVOTED DURING TRADING HOURS: 10  
11.DUTIES: PASSIVE MEMBER/INVESTOR

II.

1.FOR PROFIT OR NOT FOR PROFIT: FOR-PROFIT ORGANIZATION  
2.NAME OF OUTSIDE BUSINESS ORGANIZATION: BRMG LLC  
3.INVESTMENT RELATED: Y  
4.ADDRESS OF BUSINESS:  
3904 THOROUGHbred LANE,  
OWINGS MILLS, MARYLAND 21117  
5.NATURE OF BUSINESS: LLC,  
6.COMPENSATION FOR ACTIVITY: Y  
7.POSITION, TITLE, ASSOCIATION: OWNER,  
8.START DATE OF RELATIONSHIP: 6/26/2013  
9.NUMBER OF HOURS DEVOTED: 5 HOUR(S) MONTHLY  
10.NUMBER OF HOURS DEVOTED DURING TRADING HOURS: 1  
11.DUTIES: REAL ESTATE LLC FOR MY FATHER AND I

III. I\*81513

FOR PROFIT OR NOT FOR PROFIT: FOR-PROFIT ORGANIZATION  
NAME OF OUTSIDE BUSINESS ORGANIZATION: GF ANGEL LLC  
INVESTMENT RELATED: Y  
ADDRESS OF BUSINESS:  
3904 THOROUGHbred LANE,  
OWINGS MILLS, MARYLAND 21117  
NATURE OF BUSINESS: LLC,  
COMPENSATION FOR ACTIVITY: N  
POSITION, TITLE, ASSOCIATION: GENERAL PARTNER,  
START DATE OF RELATIONSHIP: 3/19/2013  
NUMBER OF HOURS DEVOTED: 40 HOUR(S) ANNUALLY  
NUMBER OF HOURS DEVOTED DURING TRADING HOURS: 5  
DUTIES: ENTITY CREATE FOR ANGEL INVESTING. ALL OF MY ANGEL INVESTMENTS THAT HAVE BEEN APPROVED,  
WERE IN THIS ENTITY.

I\*82961

FOR PROFIT OR NOT FOR PROFIT: NON-PROFIT ORGANIZATION  
NAME OF OUTSIDE BUSINESS ORGANIZATION: JCC OF GREATER WASHINGTON



## Registration & Employment History



### OTHER BUSINESS ACTIVITIES

INVESTMENT RELATED: Y

ADDRESS OF BUSINESS:

6125 MONTROSE RD,  
ROCKVILLE, MARYLAND 20852

NATURE OF BUSINESS: CHARITABLE ORGANIZATION,

COMPENSATION FOR ACTIVITY: N

POSITION, TITLE, ASSOCIATION: COMMITTEE MEMBER,

START DATE OF RELATIONSHIP: 7/27/2015

NUMBER OF HOURS DEVOTED: 40 HOUR(S) ANNUALLY

NUMBER OF HOURS DEVOTED DURING TRADING HOURS: 20

DUTIES: INVESTMENT COMMITTEE MEMBER OF THE ENDOWMENT FOR THE JCC OF GREATER WASHINGTON

I\*82962

FOR PROFIT OR NOT FOR PROFIT: NON-PROFIT ORGANIZATION

NAME OF OUTSIDE BUSINESS ORGANIZATION: JEWISH COMMUNITY FEDERATION OF BALTIMORE

INVESTMENT RELATED: N

ADDRESS OF BUSINESS:

BALTIMORE, MARYLAND 21201

NATURE OF BUSINESS: CHARITABLE ORGANIZATION,

COMPENSATION FOR ACTIVITY: N

POSITION, TITLE, ASSOCIATION: COMMITTEE MEMBER,

START DATE OF RELATIONSHIP: 8/5/2015

NUMBER OF HOURS DEVOTED: 40 HOUR(S) ANNUALLY

NUMBER OF HOURS DEVOTED DURING TRADING HOURS: 2

DUTIES: HELPING WITH STRATEGY IN RAISING MONEY FOR THE ASSOCIATED JEWISH CHARITIES GENERAL CAMPAIGN





## 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
Termination	1

### 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:** Merrill Lynch, Pierce, Fenner & Smith Incorporated  
**Termination Type:** Discharged  
**Termination Date:** 11/06/2015  
**Allegations:** Conduct including discussing confidential, non-customer information with a third party outside the Firm and failing to properly disclose outside business activities.  
**Product Type:** Direct Investment-DPP & LP Interests

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**Reporting Source:** Individual  
**Firm Name:** Merrill Lynch, Pierce, Fenner & Smith  
**Termination Type:** Discharged  
**Termination Date:** 11/06/2015  
**Allegations:** Conduct including discussing confidential, non-customer information with a third-party outside the Firm and failing to properly disclose outside business activities.  
**Product Type:** Direct Investment-DPP & LP Interests



## End of Report

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