



IAPD Report

JEFFREY A TOOKE

CRD# 5621579

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Qualifications	2 - 5
Registration and Employment History	6 - 7
Disclosure Information	8



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

JEFFREY A TOOKE (CRD# 5621579)

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 **07/16/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	FOUR POINTS CAPITAL PARTNERS LLC	CRD# 43149	08/25/2017
IA	MHA FINANCIAL CORP	CRD# 7462	05/30/2019

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **21** 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	AVENDUS CAPITAL, INC.	150160	Buffalo, NY	10/17/2013 - 12/05/2023
B	NIAGARA INTERNATIONAL CAPITAL LIMITED	135327	CLARENCE, NY	02/08/2010 - 07/24/2017

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
Customer Dispute	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 **21** jurisdiction(s) and 1 SRO(s) through his or her employer(s).

Employment 1 of 2

Firm Name: **MHA FINANCIAL CORP**
Main Address: 55A E. RIDGEWOOD AVENUE
SUITE 12
RIDGEWOOD, NJ 07450
Firm ID#: 7462

	Regulator	Registration	Status	Date
IA	Massachusetts	Investment Adviser Representative	Approved	06/04/2019
IA	New Jersey	Investment Adviser Representative	Approved	03/10/2021
IA	New York	Investment Adviser Representative	Approved	04/14/2021
IA	Texas	Investment Adviser Representative	Approved	05/30/2019

Branch Office Locations

MHA FINANCIAL CORP
BUFFALO, NY

MHA FINANCIAL CORP
55A E. RIDGEWOOD AVENUE
SUITE 12
RIDGEWOOD, NJ 07450

Employment 2 of 2

Firm Name: **FOUR POINTS CAPITAL PARTNERS LLC**
Main Address: 55A E. RIDGEWOOD AVENUE
SUITE 12
RIDGEWOOD, NJ 07450
Firm ID#: 43149

	Regulator	Registration	Status	Date
B	FINRA	General Securities Principal	Approved	08/25/2017
B	FINRA	General Securities Representative	Approved	08/25/2017



Qualifications

	Regulator	Registration	Status	Date
B	FINRA	Investment Banking Representative	Approved	08/25/2017
B	FINRA	Operations Professional	Approved	08/25/2017
B	FINRA	Investment Banking Principal	Approved	10/01/2018
B	FINRA	Compliance Officer	Approved	02/06/2021
B	Alaska	Agent	Approved	11/29/2017
B	Arizona	Agent	Approved	08/25/2017
B	California	Agent	Approved	08/25/2017
B	Colorado	Agent	Approved	12/10/2019
B	District of Columbia	Agent	Approved	09/18/2018
B	Florida	Agent	Approved	08/25/2017
B	Georgia	Agent	Approved	08/25/2017
B	Maryland	Agent	Approved	09/21/2017
B	Massachusetts	Agent	Approved	09/18/2018
B	Nevada	Agent	Approved	03/05/2020
B	New Hampshire	Agent	Approved	08/25/2017
B	New Jersey	Agent	Approved	09/21/2017
B	New York	Agent	Approved	08/25/2017
B	North Carolina	Agent	Approved	08/25/2017
B	Oregon	Agent	Approved	12/10/2019



Qualifications

	Regulator	Registration	Status	Date
B	Pennsylvania	Agent	Approved	08/25/2017
B	South Dakota	Agent	Approved	09/21/2017
B	Tennessee	Agent	Approved	09/21/2017
B	Texas	Agent	Approved	08/25/2017
B	Virginia	Agent	Approved	09/18/2018
B	Washington	Agent	Approved	08/25/2017

Branch Office Locations

Buffalo, NY

BUFFALO, 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 2 principal/supervisory exams, 4 general industry/product exams, and 2 state securities law exams.




Principal/Supervisory Exams

	Exam	Category	Date
	Compliance Officer Examination (S14)	Series 14	01/02/2023
	General Securities Principal Examination (S24)	Series 24	10/13/2016

General Industry/Product Exams

	Exam	Category	Date
	Investment Banking Registered Representative Examination (S79TO)	Series 79TO	01/02/2023
	Operations Professional Examination (S99TO)	Series 99TO	01/02/2023
	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
	General Securities Representative Examination (S7)	Series 7	02/06/2010

State Securities Law Exams

	Exam	Category	Date
	 Uniform Combined State Law Examination (S66)	Series 66	10/11/2012
	 Uniform Securities Agent State Law Examination (S63)	Series 63	03/12/2010

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	10/17/2013 - 12/05/2023	AVENDUS CAPITAL, INC.	CRD# 150160	Buffalo, NY
B	02/08/2010 - 07/24/2017	NIAGARA INTERNATIONAL CAPITAL LIMITED	CRD# 135327	CLARENCE, 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
05/2019 - Present	MHA FINANCIAL CORP	CHIEF COMPLIANCE OFFICER	Y	NEW YORK, NY, United States
08/2017 - Present	FOUR POINTS CAPITAL PARTNERS	REGISTERED REP	Y	NEW YORK, NY, United States
03/2014 - Present	BAY HARBOR ADVISORS LLC	MANAGING PARTNER	Y	BUFFALO, NY, United States
09/2013 - Present	AVENDUS CAPITAL, INC.	CHIEF COMPLIANCE OFFICER - RIA	Y	NEW YORK, NY, United States
06/2003 - Present	FLOWERS ETC.	BUSINESS ASSISTANT/DELIVER Y	N	BUFFALO, NY, United States
10/2008 - 07/2017	NIAGARA INTERNATIONAL CAPITAL LIMITED	REGISTERED REPRESENTATIVE	Y	CLARENCE, 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.

(1) FLOWERS ETC., NON INVESTMENT REALTED: LOCATION: BUFFALO NY; POSITION: CONSULTANT/DRIVER; START DATE: 2003; NUMBER OF HOURS: 4 HRS/WK, 0 DURING TRADING HOURS; DUTIES: DRIVER FOR DOMESTIC PARTNERS FLOWER SHOP

(2) NON-VARIABLE INSURANCE PRODUCTS; INVESTMENT RELATED; LOCATION: BUFFALO, NY; NATURE OF BUSINESS: GENERAL NON-VARIABLE INSURANCE PRODUCTS SALES; START DATE: 5/2011; NUMBER OF HOURS: 4-8 PER/MONTH, 1-2 HOURS/MONTH DURING TRADING HOUR

(3) BAY HARBOR ADVISORS LLC; INVESTMENT RELATED; LOCATION: BUFFALO, NY; POSITION/TITLE: MANAGING PARTNER; NATURE OF BUSINESS: FINANCIAL SERVICES (BD/IA) COMPLIANCE CONSULTING; START DATE: 3/2014; NUMBER OF HOURS: 20/MONTH; 12/MONTH DURING TRADING HOURS



Registration & Employment History



OTHER BUSINESS ACTIVITIES

(4) FOUR POINTS INSURANCE AGENCY, LLC; INVESTMENT RELATED; LOCATION: NEW YORK, NY; POSITION HELD: CCO; NATURE OF BUSINESS: INSURANCE; START DATE: 08/2017; NUMBER OF HOURS: 20 PER/MONTH DURING TRADING HOURS; DUTIES INCLUDE SALES AND SUPERVISION OF INSURANCE ACTIVITIES, BOTH VARIABLE AND NON-VARIABLE AS DRP FOR INSURANCE AGENCY. VARIABLE SALES AND SUPERVISION DONE IN CONJUNCTION WITH FOUR POINTS CAPITAL PARTNERS, LLC.

(5) MHA FINANCIAL CORP, NEW YORK, NY; INVESTMENT RELATED; STARTED MAY 2019; POSITION: CHIEF COMPLIANCE OFFICER; 4 HOURS/WEEK DURING TRADING.

(6) FOUR POINTS CAPITAL PARTNERS, NEW YORK, NY; INVESTMENT RELATED; STARTED 7/2017; CHIEF COMPLIANCE OFFICER; 30 HOURS/WEEK DURING TRADING

(7) TRINITY EPISCOPAL CHURCH, BUFFALO, NY; NOT INVESTMENT RELATED; STARTED APRIL 2022; CYBERSACRISTAN; LIVESTREAMING FOR SERVICES, WEDDINGS, FUNERALS, ETC.; ESTIMATED APPROXIMATELY 1-2 HOURS/WEEK.

(8) CENTER FOR GLASS & LIGHT, BUFFALO, NY; NOT INVESTMENT RELATED; STARTED JULY 2022; BOARD MEMBER/TREASURER; BOARD MEMBER OF 501C3 SEEKING VARIOUS FUNDING FOR THE RESTORATION OF THE STAINED GLASS IN TRINITY EPISCOPAL CHURCH. 1 HOUR/MONTH.

(9) EPISCOPAL DIOCESE OF WNY, TONAWANDA, NY; NOT INVESTMENT RELATED; STARTED SEPTEMBER 2022; TRANSITIONAL DEACON (ORDAINED 5/18/2024); IN FORMATION FOR ORDINATION TO THE EPISCOPALIAN PRIESTHOOD. INCLUDES BEING SUPPLY CLERGY FOR VARIOUS CHURCHES, AND INCLUDES SACREDQ/SACRED QUEST WEBSITE FOR SERMONS, REFLECTIONS, ETC.



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
Customer Dispute	1

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: Regulator

Employing firm when activities occurred which led to the complaint: Four Points Capital Partners LLC

Allegations: Tooke was named in a customer complaint that asserted the following causes of action: suitability, churning, failure to supervise, breach of fiduciary duty, breach of contract, unauthorized trading, negligence, misrepresentation, and omission of facts.

Product Type: Other: Unspecified securities

Alleged Damages: \$316,769.50

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: FINRA - CASE #23-00088

Date Notice/Process Served: 01/10/2023

Arbitration Pending? Yes

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: FOUR POINTS CAPITAL PARTNERS LLC

Allegations: Tooke was named collectively as a respondent, but not individually, in a customer complaint that asserted the following causes of action: suitability, churning, failure



to supervise, breach of fiduciary duty, breach of contract, unauthorized trading, negligence, misrepresentation, and omission of facts.

Product Type: Equity-OTC

Alleged Damages: \$316,769.50

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA

Docket/Case #: [23-00088](#)

Date Notice/Process Served: 02/23/2023

Arbitration Pending? No

Disposition: Settled

Disposition Date: 06/26/2025

Monetary Compensation Amount: \$75,000.00

Individual Contribution Amount: \$0.00

Broker Statement Rep vigorously denies all allegations and claims, and is vigorously defending the arbitration. Allegations and claims are frivolous and erroneous as rep has had no involvement with claimant, and no supervision of the claimant's rep or business line. Rep and firm have believed the occurrence to not be reportable related to U4/U5 guidance and Regulatory Notice 22-10.



End of Report

This page is intentionally left blank.