



IAPD Report

THOMAS M MURPHY

CRD# 5654189

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



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

THOMAS M MURPHY (CRD# 5654189)

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 **11/07/2024**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	EMPIRIKAL PARTNERS LLC	CRD# 282691	12/06/2024

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	BRIDGEWAY WEALTH PARTNERS, LLC	299810	NEW YORK, NY	01/31/2022 - 12/31/2023
IA	CHARLESWORTH & RUGG, INC.	284712	LOS ANGELES, CA	06/01/2018 - 04/22/2020
IA	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	7691	NEW YORK, NY	06/15/2010 - 04/13/2018

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
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: **EMPIRIKAL PARTNERS LLC**

Main Address: PHOENIX, AZ

Firm ID#: 282691

	Regulator	Registration	Status	Date
IA	New Jersey	Investment Adviser Representative	Approved - Pending IAR CE	01/01/2026

Branch Office Locations

EMPIRIKAL PARTNERS LLC
EDGEWATER, NJ



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 Securities Industry Essentials Examination (SIE)	SIE	04/13/2018
B General Securities Representative Examination (S7)	Series 7	03/26/2009

State Securities Law Exams

Exam	Category	Date
IA B Uniform Combined State Law Examination (S66)	Series 66	06/14/2010
B Uniform Securities Agent State Law Examination (S63)	Series 63	05/08/2009



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	01/31/2022 - 12/31/2023	BRIDGEWAY WEALTH PARTNERS, LLC	CRD# 299810	NEW YORK, NY
IA	06/01/2018 - 04/22/2020	CHARLESWORTH & RUGG, INC.	CRD# 284712	LOS ANGELES, CA
IA	06/15/2010 - 04/13/2018	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	NEW YORK, NY
B	03/31/2010 - 04/13/2018	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	NEW YORK, NY
B	03/27/2009 - 12/09/2009	JOHN THOMAS FINANCIAL	CRD# 40982	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
03/2024 - Present	Empirikal Partners LLC	Investment Advisor Representative	Y	Phoenix, AZ, United States
06/2022 - Present	Titan Strategic Partners, LLC	Partner/Consultant	N	Jersey City, NY, United States
05/2018 - Present	Thomas M. Murphy, LLC	Owner	N	Jersey City, NY, United States
02/2020 - 01/2024	Bridgeway Wealth Partners LLC	Vice President / Wealth Advisor	Y	New York, NY, United States
06/2018 - 04/2020	Charlesworth & Rugg	Investment Advisor Representative	Y	New York, NY, United States
05/2010 - 04/2018	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	INVESTMENT ADVISOR REPRESENTATIVE	Y	NEW YORK, NY, United States
03/2010 - 04/2018	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	REGISTERED REPRESENTATIVE	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.

1. TITAN STRATEGIC PARTNERS, LLC, NOT INVESTMENT RELATED; 50 CONSTITUTION WAY NEW JERSEY CITY NJ 07305; BUSINESS CONSULTING; FOUNDER AS OF 6/1/2023; 20 HOURS PER MONTH WITH NONE DURING TRADING HOURS; ADVISE EXECUTIVES ON EFFICIENCIES IN THEIR BUSINESS MODELS RELATED TO GROWTH AND FINANCING.
2. THOMAS M MURPHY LLC; INVESTMENT RELATED; ADDRESS OF RECORD; ADMINISTRATION FOR INVESTMENT BUSINESS; OWNER; STARTED 5/2018; 160 HOURS PER MONTH WITH 8 HOURS DURING TRADING HOURS; LLC FOR ADMINISTRATIVE PURPOSES.



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: 02/18/2020

Docket/Case Number: [2018058148801](#)

Employing firm when activity occurred which led to the regulatory action: Merrill, Lynch, Pierce, Fenner & Smith Inc.

Product Type: Real Estate Security

Allegations: Without admitting or denying the findings, Murphy consented to the sanctions and to the entry of findings that he executed subscription agreements as an authorized signatory for his member firm, without its authorization, to assist clients of the firm's self-directed brokerage business invest in third-party private real estate funds. The findings stated that Murphy executed seven of the subscription agreements after his firm instructed him to cease any involvement with the third-party fund manager. Murphy did not receive any compensation from the third-party fund manager for his actions. Murphy's conduct created confusion over the firm's role in the investments and whether the transfers from the clients' IRAs to the private funds would be treated as qualified distributions.

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:

02/18/2020

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:	four months
Start Date:	02/18/2020
End Date:	06/17/2020

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:	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:	Suspension
Date Initiated:	02/18/2020
Docket/Case Number:	2018058148801
Employing firm when activity occurred which led to the regulatory action:	Merrill, Lynch, Pierce, Fenner & Smith Inc.



Product Type:	Real Estate Security
Allegations:	Without admitting or denying the findings, Murphy consented to the sanctions and to the entry of findings that he executed subscription agreements as an authorized signatory for his member firm, without its authorization, to assist clients of the firm's self-directed brokerage business invest in third-party private real estate funds.
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:	02/18/2020
Sanctions Ordered:	Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	All Capacities
Duration:	4 months
Start Date:	02/18/2020
End Date:	06/17/2020
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:	Deferred
Is Payment Plan Current:	Yes
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	
Broker Statement	Murphy did not receive any compensation from the third-party fund manager for his actions. Murphy's conduct created confusion over the firm's role in the investments and whether the transfers from the clients' IRAs to the private funds would be treated as qualified distributions.



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:	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED
Allegations:	Client alleges financial advisor failed to act in his best interest and made an unsuitable investment recommendation in October 2017.
Product Type:	Direct Investment-DPP & LP Interests
Alleged Damages:	\$150,000.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	23-01696
Date Notice/Process Served:	06/08/2023
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	10/10/2024
Monetary Compensation Amount:	\$75,000.00
Individual Contribution Amount:	\$0.00

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED
Allegations:	From October 2017 to the present, claimant [REDACTED], a non-accredited investor, granted Murphy de facto control over his account. On October 17, 2017, he entered a Subscription Agreement through broker Murphy, investing \$150,000 from his IRA into MG Capital Management Residential Fund IV LP. Murphy allegedly made false statements to [REDACTED] about the profitability and legitimacy of the investment, leading [REDACTED] to invest his retirement savings into these speculative securities linked to fraudulent entities. [REDACTED] is seeking \$150,000 along with punitive damages.
Product Type:	Real Estate Security
Alleged Damages:	\$150,000.00
Is this an oral complaint?	No



Is this a written complaint? Yes

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

Arbitration/Reparation forum or court name and location: FINRA

Docket/Case #: 23-01696

Filing date of arbitration/CFTC reparation or civil litigation: 02/18/2020

Customer Complaint Information

Date Complaint Received: 06/08/2023

Complaint Pending? No

Status: Arbitration Award/Monetary Judgment (for claimants/plaintiffs)

Status Date: 10/09/2024

Settlement Amount: \$75,000.00

Individual Contribution Amount: \$0.00

Broker Statement

MG Capital LP ("MG") was brought to my attention four (4) years ago while working in a Bank of America branch. At that time, an existing ML Edge client came into the banking center where I worked expressing interest in making a capital commitment to one of MG's funds. I did nothing more than provide a standard explanation of how the client could go about her effort to commit capital to MG. This client was not a client of mine and I received no compensation nor had any expectation of compensation as a result of this encounter. Furthermore, I had no further communication with this initial customer or MG regarding this incident.

In 2017, a person who indicated they worked for MG contacted me to inquire if they could refer business to Merrill Lynch ("ML"). I recall explaining to the MG representative that as a Wealth Management Advisor I do not advise or provide recommendations regarding this type of investment. As per my understanding of ML rules at the time, I explained to the MG representative that if their customers wanted to open self-directed accounts that was an option available to them. Without any further communication or notice to myself, MG customers went online to our self-directed site, which allowed them to open their own accounts with the discretion to choose how to direct their money. While attempting to focus on the needs of ML clients in accordance with my standard duties, I was asked, by MG, to sign several subscription agreements for the clients who had already opened the aforementioned self-directed ML Edge accounts. At no point did I solicit or suggest that MG or the clients in question should utilize me to help facilitate their access to MG's investment offerings on the ML Edge platform. Additionally, I was unaware that the protocol was to forward the documents to our compliance group for approval prior to signing. None of my superiors or colleagues offered guidance or education regarding the protocols for this situation. As such, when asked by these ML clients to assist them in meeting the deadline for commitments to the investment opportunity in question via their self-direct accounts, I signed the documents with no knowledge that pre-approval from compliance was necessary. Ultimately, these documents were approved by the appropriate parties within the ML hierarchy without any changes and with no harm to any clients. In fact, the ML clients were able to maintain their investment in the MG opportunities in their self-directed accounts with no further issues, to the best of my knowledge. I only became aware that something was amiss after being told not to sign further



subscription documents allowing these clients to access the MG investments via their own discretionary accounts. I was given no explanation as to the compliance or procedural issues of the situation, nor did I believe there to be any harm or substantive breach of protocols as the clients in question were all allowed to stay in the MG investments. I signed a few other subscription documents for ML clients that desired access to the MG investments, again with no knowledge of the full compliance context of the situation. As with the initial transactions, I had no financial or beneficial relationship with either the clients in question or MG. I received no compensation in any form.

With no further guidance from the compliance group or my supervisors, I found out there was no repercussion for the firm as the documents were eventually approved and the Edge customers were able to maintain their self-directed investments in MG. I was let go from Merrill because of not knowing the firm's protocol for a situation like this. During this process, my supervisors directly stated to me that they knew I had not done anything knowingly unethical and that they expected ML itself to come under scrutiny for the lapse in compliance and oversight.



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:	03/14/2018
Allegations:	Signing subscription agreements with a non-affiliated, third-party investment advisor on behalf of the Firm without authorization, and failing to comply with a direction from management.
Product Type:	Other: Alternative Investments



End of Report

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