



## IAPD Report

# BRADLEY PHILIP SPENCER HAMILTON

CRD# 6166469

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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

### BRADLEY PHILIP SPENCER HAMILTON (CRD# 6166469)

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 **02/25/2025**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	HOXTON WEALTH USA LLC	CRD# 307387	04/11/2022

### QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **2** 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	BLACKTOWER FINANCIAL MANAGEMENT (US) LLC	289142	NEW YORK, NY	12/21/2021 - 02/14/2022
IA	BLACKTOWER FINANCIAL MANAGEMENT (US) LLC	289142	NEW YORK, NY	12/18/2017 - 02/14/2022
IA	DEVERE USA INC.	155775	SANDYPORT MARINA VILLAGE, Bahamas, The	07/21/2014 - 06/22/2017

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
Regulatory Event	1
Civil Event	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 **2** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

#### Employment 1 of 1

Firm Name: **HOXTON WEALTH USA LLC**

Main Address: 101 HUDSON STREET  
21ST FLOOR  
JERSEY CITY, NJ 07302

Firm ID#: 307387

Regulator	Registration	Status	Date
IA New Jersey	Investment Adviser Representative	Approved - Pending IAR CE	01/01/2026
IA Texas	Investment Adviser Representative	Restricted Approval	10/05/2022

#### Branch Office Locations

##### **HOXTON WEALTH USA LLC**

101 Hudson Street  
21st Floor  
Jersey City, NJ 07302



## 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, 0 general industry/product exams, and 1 state securities law exam.**

#### Principal/Supervisory Exams

Exam	Category	Date
No information reported.		

#### General Industry/Product Exams

Exam	Category	Date
No information reported.		

#### State Securities Law Exams

Exam	Category	Date
IA Uniform Investment Adviser Law Examination (S65)	Series 65	10/18/2021

### 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	12/21/2021 - 02/14/2022	BLACKTOWER FINANCIAL MANAGEMENT (US) LLC	CRD# 289142	NEW YORK, NY
IA	12/18/2017 - 02/14/2022	BLACKTOWER FINANCIAL MANAGEMENT (US) LLC	CRD# 289142	NEW YORK, NY
IA	07/21/2014 - 06/22/2017	DEVERE USA INC.	CRD# 155775	SANDYPORT MARINA VILLAGE, Bahamas, The

### 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
05/2018 - Present	Blacktower Financial Management (US) LLC	Investment Adviser Representative	Y	New York, NY, United States
06/2017 - 05/2018	Blacktower Cayman	International Financial Adviser	Y	Grand Cayman 1209, Cayman Islands
04/2013 - 05/2017	DEVERE USA INC.	INVESTMENT ADVISOR	Y	NEW YORK, 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.

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
Civil Event	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

<b>Reporting Source:</b>	Individual
<b>Regulatory Action Initiated By:</b>	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
<b>Sanction(s) Sought:</b>	Civil and Administrative Penalty(ies)/Fine(s) Disgorgement
<b>Date Initiated:</b>	06/04/2018
<b>Docket/Case Number:</b>	1:18-CV-04930
<b>Employing firm when activity occurred which led to the regulatory action:</b>	Devere USA
<b>Product Type:</b>	Other: Qualifying Recognized Overseas Pension Scheme ("QROPS")
<b>Allegations:</b>	ON JUNE 4, 2018, THE SECURITIES AND EXCHANGE COMMISSION FILED A CIVIL ACTION IN UNITED STATES FEDERAL DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK, ENCAPTIONED SECURITIES AND EXCHANGE COMMISSION V. BENJAMIN ALDERSON AND BRADLEY HAMILTON, NO. 1:18-CV-04930. MR. HAMILTON IS AN ADVISORY AFFILIATE OF BLACKTOWER. THE RELIEF SOUGHT IS: 1) A FINDING THAT THE DEFENDANTS VIOLATED THE SECURITIES LAWS AND RULES THEREUNDER AS ALLEGED; 2) A PERMANENT INJUNCTION RESTRAINING DEFENDANTS FROM FURTHER VIOLATIONS OF THE SECURITIES LAWS AS ALLEGED; 3) DISGORGEMENT OF ANY ILL-GOTTEN GAINS AND PRE-JUDGMENT INTEREST ON ANY SUCH AMOUNT; 4) PAYMENT OF CIVIL MONETARY PENALTIES; AND 5) SUCH OTHER RELIEF AS THE COURT MAY FIND JUST AND PROPER.

THE INVOLVED PRODUCT IS A QUALIFYING RECOGNISED OVERSEAS



PENSION SCHEME ("QROPS"). THE COMPLAINT'S ALLEGATIONS INVOLVE MR. HAMILTON'S ACTIVITIES WHILE EMPLOYED AS AN INVESTMENT ADVISORY REPRESENTATIVE AT DEVERE USA, INC. THE COMPLAINT ALLEGES THAT MR. HAMILTON DEFRAUDED HUNDREDS OF CLIENTS AND PROSPECTIVE CLIENTS IN THE UNITED STATES BY MISLEADING THEM ABOUT THE BENEFITS OF TRANSFERRING THEIR U.K.-BASED PENSIONS INTO QROPS WHILE CONCEALING SERIOUS CONFLICTS OF INTEREST, INCLUDING THE COMMISSIONS HE WOULD RECEIVE.

The matters relating to this civil case have been fully resolved:

- Mr. Hamilton fully cooperated with the SEC and, in July 2020, consented to the entry of an order by the Court without admitting or denying the SEC's allegations; Case No. 18-cv-4930 (VEC). The Court permanently enjoined Mr. Hamilton from violating the Investment Adviser Act, and ordered him to pay disgorgement of fees earned, plus interest, and an additional civil penalty;
- In 2021, Mr. Hamilton fully paid the ordered disgorgement of fees, plus interest, and the additional civil penalty;
- To date, the Court overseeing the complaint has made no findings regarding Mr. Hamilton's activities post the consent order; and
- The civil case notwithstanding, Mr. Hamilton has never had his securities licensing suspended, canceled or revoked, and has never been prohibited from continuing to engage in his licensed investment advisory activities.

<b>Current Status:</b>	Final
<b>Resolution:</b>	Stipulation and Consent
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	Yes
<b>Resolution Date:</b>	07/08/2020
<b>Sanctions Ordered:</b>	Civil and Administrative Penalty(ies)/Fine(s) Disgorgement
<b>Monetary Sanction 1 of 2</b>	
<b>Monetary Related Sanction:</b>	Disgorgement
<b>Total Amount:</b>	\$275,060.57
<b>Portion Levied against individual:</b>	\$0.00
<b>Payment Plan:</b>	
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	07/07/2021
<b>Was any portion of penalty waived?</b>	No
<b>Amount Waived:</b>	
<b>Monetary Sanction 2 of 2</b>	
<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$75,000.00



**Portion Levied against individual:** \$0.00

**Payment Plan:**

**Is Payment Plan Current:**

**Date Paid by individual:** 08/07/2020

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

**Amount Waived:**



## Civil Event

This disclosure event involves an injunction issued by a foreign or domestic court in connection with investment-related activity, a finding by a domestic or foreign court of a violation of any investment-related statute or regulation, or an action dismissed by a domestic or foreign court pursuant to a settlement agreement.

### Disclosure 1 of 1

<b>Reporting Source:</b>	Regulator
<b>Initiated By:</b>	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
<b>Relief Sought:</b>	Civil and Administrative Penalty(ies)/Fine(s) Disgorgement Injunction Monetary Penalty other than Fines
<b>Date Court Action Filed:</b>	06/04/2018
<b>Product Type:</b>	Other: unspecified securities
<b>Type of Court:</b>	Federal Court
<b>Name of Court:</b>	United States District Court Southern District of New York
<b>Location of Court:</b>	New York, NY
<b>Docket/Case #:</b>	1:18-cv-04930
<b>Employing firm when activity occurred which led to the action:</b>	deVere USA, Inc.
<b>Allegations:</b>	<p>The Securities and Exchange Commission (the "Commission"), for its Complaint against Defendants Benjamin Alderson ("Alderson") and Bradley Hamilton ("Hamilton") (collectively, "Defendants"), alleges that Alderson, the former Chief Executive Officer ("CEO") of Commission-registered investment adviser deVere USA, Inc. ("DVU"), and Hamilton, a former DVU Area Manager, defrauded hundreds of clients and prospective clients resident in the United States ("US") by misleading them about the benefits of irreversibly transferring their United Kingdom ("UK") pensions to an offshore pension plan while concealing serious conflicts of interest, including the lucrative commissions Alderson and Hamilton each stood to and did receive. In doing so, Defendants violated the fiduciary duty that every investment adviser has to its clients and prospective clients: to put the client's best interests first, employ utmost honesty, and fully disclose all material information, including actual and potential conflicts of interest.</p> <p>From approximately June 2013 to March 2017 (the "Relevant Period"), DVU's client and prospective client base consisted primarily of British expatriates who resided in the US and had pensions based in the UK from prior employment. Alderson and Hamilton were investment adviser representatives ("IARs") of DVU and recommended that these investors transfer their UK pensions to an offshore pension plan known as a Qualifying Recognised Overseas Pension Scheme ("QROPS"). During the Relevant Period, Alderson and Hamilton were the top salespeople within DVU, placing first and second, respectively, in terms of commissions generated from QROPS transfers.</p> <p>Though Alderson and Hamilton were investment advisers with a fiduciary duty to provide full and fair disclosure of all material facts, they nonetheless provided advice that was self-interested and designed to push clients and prospective clients toward a QROPS transfer, which, when effected, generated for Defendants millions of dollars in undisclosed commissions.</p> <p>First, Defendants concealed their significant financial motivation to consummate a QROPS transfer.</p> <p>Second, Alderson and Hamilton misleadingly touted QROPS as offering what they called "open architecture," which they explained as giving clients investment</p>



flexibility through access to over 15,000 securities. They also instructed and trained other DVU IARs to do the same. In reality, however, Defendants were well aware that DVU IARs were only permitted to recommend to clients, and allow clients to choose from, a limited number of investment options that at most, was less than one hundred, not thousands.

Third, Defendants misleadingly touted the tax benefits of a QROPS to investors without informing them of tax risks, including that a QROPS transfer could be a taxable event in the US. Defendants also falsely claimed that alternatives to QROPS transfers—including leaving the pension in the UK or transferring it to a self-invested account known as a Self-Invested Personal Pension ("SIPP")—would subject the pension holder to certain tax consequences, such as double taxation by the US and UK, despite knowing about a UK-US tax treaty that resulted in a contrary outcome. Defendants instructed and trained other DVU IARs to make similar misrepresentations and omissions to potential clients regarding tax treatment.

Defendants violated Section 206(1) and 206(2) of the Advisers Act or, in the alternative, Defendants are liable under Advisers Act Section 209(f) for aiding and abetting DVU's violations of Advisers Act Sections 206(1) and 206(2).

<b>Current Status:</b>	Final
<b>Resolution:</b>	Judgment Rendered
<b>Resolution Date:</b>	07/08/2020
<b>Sanctions Ordered or Relief Granted:</b>	Civil and Administrative Penalty(ies)/Fine(s) Disgorgement Injunction Monetary Penalty other than Fines

#### Capacities 1 of 1

<b>Capacities Affected:</b>	N/A
<b>Duration:</b>	permanent
<b>Start Date:</b>	07/08/2020
<b>End Date:</b>	

#### Monetary Sanction 1 of 3

<b>Monetary Sanction:</b>	Disgorgement
<b>Total Amount:</b>	\$265,000.00
<b>Portion against individual:</b>	265000

#### Date Paid:

<b>Portion Waived:</b>	No
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#### Amount Waived:

#### Monetary Sanction 2 of 3

<b>Monetary Sanction:</b>	Monetary Fine
<b>Total Amount:</b>	\$75,000.00
<b>Portion against individual:</b>	75000

#### Date Paid:

<b>Portion Waived:</b>	No
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#### Amount Waived:

#### Monetary Sanction 3 of 3



<b>Monetary Sanction:</b>	pre-judgment interest on disgorgement
<b>Total Amount:</b>	\$10,060.57
<b>Portion against individual:</b>	10060.57
<b>Date Paid:</b>	
<b>Portion Waived:</b>	No
<b>Amount Waived:</b>	
<b>Regulator Statement</b>	On July 8, 2020, a final judgment was entered, by consent, against Hamilton wherein he was permanently restrained and enjoined from violating, directly or indirectly, Section 206(2) of the Investment Advisers Act of 1940 ("Advisers Act"). He is also liable for disgorgement of \$265,000, together with prejudgment interest thereon in the amount of \$10,060.57, and a civil penalty in the amount of \$75,000.

<b>Reporting Source:</b>	Individual
<b>Initiated By:</b>	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
<b>Relief Sought:</b>	Civil and Administrative Penalty(ies)/Fine(s) Disgorgement Injunction
<b>Date Court Action Filed:</b>	06/04/2018
<b>Product Type:</b>	Other: Qualifying Recognized Overseas Pension Scheme ("QROPS")
<b>Type of Court:</b>	Federal Court
<b>Name of Court:</b>	Southern District
<b>Location of Court:</b>	New York, NY
<b>Docket/Case #:</b>	1:18-CV-0493
<b>Employing firm when activity occurred which led to the action:</b>	Devere USA
<b>Allegations:</b>	ON JUNE 4, 2018, THE SECURITIES AND EXCHANGE COMMISSION FILED A CIVIL ACTION IN UNITED STATES FEDERAL DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK, ENCAPTIONED SECURITIES AND EXCHANGE COMMISSION V. BENJAMIN ALDERSON AND BRADLEY HAMILTON, NO. 1:18-CV-04930. MR. HAMILTON IS AN ADVISORY AFFILIATE OF BLACKTOWER. THE RELIEF SOUGHT IS: 1) A FINDING THAT THE DEFENDANTS VIOLATED THE SECURITIES LAWS AND RULES THEREUNDER AS ALLEGED; 2) A PERMANENT INJUNCTION RESTRAINING DEFENDANTS FROM FURTHER VIOLATIONS OF THE SECURITIES LAWS AS ALLEGED; 3) DISGORGEMENT OF ANY ILL-GOTTEN GAINS AND PRE-JUDGMENT INTEREST ON ANY SUCH AMOUNT; 4) PAYMENT OF CIVIL MONETARY PENALTIES; AND 5) SUCH OTHER RELIEF AS THE COURT MAY FIND JUST AND PROPER.  THE INVOLVED PRODUCT IS A QUALIFYING RECOGNISED OVERSEAS PENSION SCHEME ("QROPS"). THE COMPLAINT'S ALLEGATIONS INVOLVE MR. HAMILTON'S ACTIVITIES WHILE EMPLOYED AS AN INVESTMENT ADVISORY REPRESENTATIVE AT DEVERE USA, INC. THE COMPLAINT ALLEGES THAT MR. HAMILTON DEFRAUDED HUNDREDS OF CLIENTS AND PROSPECTIVE CLIENTS IN THE UNITED STATES BY MISLEADING THEM ABOUT THE BENEFITS OF TRANSFERRING THEIR U.K.-BASED PENSIONS



INTO QROPS WHILE CONCEALING SERIOUS CONFLICTS OF INTEREST,  
INCLUDING THE COMMISSIONS HE WOULD RECEIVE.

<b>Current Status:</b>	Final
<b>Resolution:</b>	Consent
<b>Resolution Date:</b>	07/08/2020
<b>Sanctions Ordered or Relief Granted:</b>	Civil and Administrative Penalty(ies)/Fine(s) Disgorgement Injunction Other: Mr. Hamilton was enjoined from violating section 206(2) of the Advisers Act
<b>Capacities 1 of 1</b>	
<b>Capacities Affected:</b>	Mr. Hamilton's IAR registration was never affected or restricted by the proceedings
<b>Duration:</b>	permanent
<b>Start Date:</b>	07/08/2020
<b>End Date:</b>	
<b>Monetary Sanction 1 of 1</b>	
<b>Monetary Sanction:</b>	Disgorgement
<b>Total Amount:</b>	\$350,060.57
<b>Portion against individual:</b>	350060.57
<b>Date Paid:</b>	07/07/2021
<b>Portion Waived:</b>	No
<b>Amount Waived:</b>	



## **End of Report**

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