



IAPD Report

ROBERT A COOKE SR.

CRD# 704677

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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

ROBERT A COOKE SR. (CRD# 704677)

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 **02/13/2020**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	BROXTON CAPITAL ADVISORS	CRD# 136914	01/07/2019

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	HUDSON COOPER ASSET MANAGEMENT, INC.	159455	LOS ANGELES, CA	01/26/2012 - 01/01/2022
IA	BROXTON CAPITAL ADVISORS	136914	LOS ANGELES, CA	02/19/2015 - 05/16/2017
IA	BROXTON CAPITAL ADVISORS LLC	136914	OLD SAN JUAN, PR	04/20/2012 - 06/04/2012

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	2



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: **BROXTON CAPITAL ADVISORS**

Main Address: 151 CALLE DE SAN FRANCISCO
SUITE 200
OLD SAN JUAN, PR 00901-1659

Firm ID#: 136914

Regulator	Registration	Status	Date
IA California	Investment Adviser Representative	Approved	01/07/2019

Branch Office Locations

BROXTON CAPITAL ADVISORS

Memphis, TN



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	09/28/2007

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	01/26/2012 - 01/01/2022	HUDSON COOPER ASSET MANAGEMENT, INC.	CRD# 159455	LOS ANGELES, CA
IA	02/19/2015 - 05/16/2017	BROXTON CAPITAL ADVISORS	CRD# 136914	LOS ANGELES, CA
IA	04/20/2012 - 06/04/2012	BROXTON CAPITAL ADVISORS LLC	CRD# 136914	OLD SAN JUAN, PR
IA	04/15/2008 - 04/02/2012	BROXTON CAPITAL ADVISORS LLC	CRD# 136914	LOS ANGELES, CA
IA	03/27/2006 - 05/01/2007	WESTERN INTERNATIONAL SECURITIES	CRD# 39262	LOS ANGELES, CA
IA	03/02/2000 - 04/11/2006	UBS FINANCIAL SERVICES INC.	CRD# 8174	CENTURY CITY, CA

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
10/2011 - Present	HUDSON COOPER ASSET MANAGEMENT, INC.	MANAGING DIRECTOR	Y	LOS ANGELES, CA, United States
10/2010 - Present	BROXTON CAPITAL ADVISORS	Investment Adviser Representative	Y	LOS ANGELES, CA, 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.

DOOZY CARDS, LLC NON-INVESTMENT, 5225 W 2ND ST. LOS ANGELES, CA 90004 5-7 HRS PER WEEK.
BROXTON CAPITAL ADVISORS 2-3 HRS PER WEEK DURING TRADING HOURS, HUDSON COOPER ASSET MGMT, INC. 4-6 HOURS/DAY DURING TRADING.



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	2

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 2

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	DABNEY/RESNICK/IMPERIAL, LLC & IMPERIAL CAPITAL, LLC
Allegations:	SUITABILITY, BREACH OF FIDUCIARY DUTY, MISREPRESENTATION
Product Type:	Debt - Corporate
Alleged Damages:	\$40,000.00

Customer Complaint Information

Date Complaint Received:	06/26/2001
Complaint Pending?	No
Status:	Arbitration/Reparation
Status Date:	06/26/2001

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.:	NASD #01-02682
Date Notice/Process Served:	06/26/2001
Arbitration Pending?	No



Disposition:	Settled
Disposition Date:	05/15/2003
Monetary Compensation Amount:	\$22,500.00
Individual Contribution Amount:	\$0.00
Firm Statement	<p>THE FIRM HAS RECEIVED A WRITTEN COMPLAINT FROM [CUSTOMERS] ALLEGING A VARIETY OF CLAIMS ARISING OUT OF THEIR HIGH YIELD PORTFOLIO AT IMPERIAL CAPITAL LLC. THE CUSTOMER STATED THAT THEY WANTED INCOME AND WERE WILLING TO TAKE HIGHER RISK TO ACHIEVE THAT INCOME. THE [CUSTOMERS] NOW CLAIM THAT THE HIGH YIELD BONDS THEY PURCHASED AT IMPERIAL CAPITAL WERE UNSUITABLE FOR THEM. MR. COOKE AND THE FIRM DENY ALL ALLEGATIONS OF WRONGDOING AND WILL VIGOROUSLY DEFEND ANY CLAIM.</p> <p>ARBITRATION #NASD #01-02682 WAS SETTLED 5/15/03 FOR \$22,500. MR. COOKE WAS NOT ASKED TO CONTRIBUTE TO THE SETTLEMENT. THE AGREEMENT REPRESENTS THE SETTLEMENTS OF ALL DISPUTED AND CONTESTED CLAIMS AND NOTHING CONTAINED THEREIN SHALL BE CONSTRUED AS AN ADMISSION BY ANY OF THE PARTIES THERETO OF ANY LIABILITY OF ANY KIND TO ANY OTHER PARTY.</p>

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	DABNEY/RESNICK/IMPERIAL LLC AND IMPERIAL CAPITAL, LLC
Allegations:	UNSUITABILITY, BREACH OF FIDUCIARY DUTY, MISREPRESENTATION.
Product Type:	Debt - Corporate
Alleged Damages:	\$40,000.00

Customer Complaint Information

Date Complaint Received:	06/26/2001
Complaint Pending?	No
Status:	Arbitration/Reparation
Status Date:	06/26/2001

Settlement Amount:

Individual Contribution Amount:
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Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.:	NASD #01-02682
Date Notice/Process Served:	06/26/2001
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	05/19/2003



Monetary Compensation Amount:	\$22,500.00
Individual Contribution Amount:	\$0.00
Broker Statement	THE FIRM HAS RECEIVED A WRITTEN COMPLAINT FROM CLIENTS ALLEGING A VARIETY OF CLAIMS ARISING OUT OF THEIR HIGH YIELD PORTFOLIO AT IMPERIAL CAPITAL LLC. THE CUSTOMER STATED THAT THEY WANTED INCOME AND WERE WILLING TO TAKE HIGHER RISK TO ACHIEVE THAT INCOME. THE CLIENTS NOW CLAIM THAT THE HIGH YIELD BONDS THEY PURCHASED AT IMPERIAL CAPITAL WERE UNSUITABLE. MR. COOKE AND THE FIRM DENY ALL ALLEGATIONS OF WRONGDOING AND WILL VIGOROUSLY DEFEND ANY CLAIM.

Disclosure 2 of 2

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	DABNEY RESNICK, INC. DABNEY/RESNICK/IMPERIAL,LLC IMPERIAL CAPITAL,LLC
Allegations:	SECURITY TRANSACTIONS FROM 1993 AT DABNEY RESNICK, 1996/7 DABNEY/RESNICK/IMPERIAL AND 1998 IMPERIAL CAPITAL,LLC. STATEMENT OF CLAIM FRAUD, NEGLIGENCE, CHURNING AND BREACH OF FIDUCIARY DUTY.
Product Type:	Debt - Corporate
Other Product Type(s):	STOCKS
Alleged Damages:	\$6,298,000.00

Customer Complaint Information

Date Complaint Received:	12/09/1998
Complaint Pending?	No
Status:	Arbitration/Reparation
Status Date:	04/01/1999
Settlement Amount:	
Individual Contribution Amount:	\$0.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.:	NASD; 98-04715
Date Notice/Process Served:	12/09/1998
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	04/01/1999
Monetary Compensation Amount:	\$900,000.00
Individual Contribution Amount:	



Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: DABNEY RESNICK, DABNEY/RESNICK/IMPERIAL, IMPERIAL CAPITAL LLC
Allegations: CLAIM FOR UNSUITABLE SECURITY TRANSACTIONS FROM 1993 AT DABNEY RESEARCH, 1997 DABNEY RESEARCH IMPERIAL AND 1998 IMPERIAL CAPITAL, CLIENT IN STATEMENTS OF CLAIM CITED FRAUD, NEGLIGENCE, CHURNING AND BREACH OF FIDUCIARY DUTY AS A RESULT OF ILLEGAL SALES PRACTICES-PUNATIVE DAMAGES \$6,298,000.

Product Type: Debt - Corporate
Other Product Type(s): EQUITIES
Alleged Damages: \$6,298,000.00

Customer Complaint Information

Date Complaint Received: 12/09/1998
Complaint Pending? No
Status: Arbitration/Reparation
Status Date: 04/01/1999

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD; 98-04715

Date Notice/Process Served: 12/09/1998

Arbitration Pending? No

Disposition: Settled

Disposition Date: 04/01/1999

Monetary Compensation Amount: \$900,000.00

Individual Contribution Amount: \$0.00

Broker Statement MUTUAL RELEASE AND SETTLEMENT AGREEMENT ENTERED INTO BY CLAIMANT IMPERIAL CAPITAL,LLC, DABNEY RESEARCH IMPERIAL,LLC, DABNEY RESEARCH INC AND ROBERT COOKE. CLAIMANT DISMISSED THE ACTION WITH PREDUDICE IN FULL AND COMPLETE SETTLEMENT OF CLAIMS AND CAUSES OF ACTION AGAINST RESPONDENTS. IN CONSIDERATION OF CLAIMANT DISMISSAL OF THE ACTION WITH PREDUDICE-RESPONDANT AGREED TO PAY CLAIMANT \$900,000. AGREEMENT REPRESENTS THE SETTLEMENTS OF ALL DISPUTED AND CONTESTED CLAIMS AND NOTHING CONTAINED THEREIN SHALL BE CONSTRUED AS AN ADMISSION BY ANY OF THE PARTIES THERETO OF ANY LIABILITY OF ANY KIND TO ANY OTHER PARTY.



End of Report

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