BrokerCheck Report

BERKSHIRE GLOBAL ADVISORS LP

CRD# 124180

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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.

About BrokerCheck®

BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**
- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.
- Please note that the information contained in a BrokerCheck 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 broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.
- **Where did this information come from?**
- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
    - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
    - information that regulators report regarding disciplinary actions or allegations against firms or brokers.
- **How current is this information?**
- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.
- **What if I want to check the background of an investment adviser firm or investment adviser representative?**
- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at https://www.adviserinfo.sec.gov. In the alternative, you may search the IAPD website directly or contact your state securities regulator at http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414.
- **Are there other resources I can use to check the background of investment professionals?**
- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.
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Thank you for using FINRA BrokerCheck.

Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at brokercheck.finra.org

For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit www.finra.org.

BERKSHIRE GLOBAL ADVISORS LP

CRD# 124180

SEC# 8-65641

Main Office Location

527 MADISON AVENUE
3RD FLOOR
NEW YORK, NY 10022-4212
Regulated by FINRA New York Office

Mailing Address

527 MADISON AVENUE
3RD FLOOR
NEW YORK, NY 10022-4212

Business Telephone Number

212-207-1000

Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

Firm Profile

This firm is classified as a other types of legal formation.

This firm was formed in Delaware on 08/01/2018.

Its fiscal year ends in December.

Firm History

Information relating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

Firm Operations

This firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 27 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? **No**

This firm conducts 3 types of businesses.

This firm is affiliated with financial or investment institutions.

This firm does not have referral or financial arrangements with other brokers or dealers.

Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm? **Yes**

The following types of disclosures have been reported:

Type	Count
Regulatory Event	1

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Firm Profile

This firm is classified as a other types of legal formation.

This firm was formed in Delaware on 08/01/2018.

Its fiscal year ends in December.

Firm Names and Locations

This section provides the brokerage firm's full legal name, "Doing Business As" name, business and mailing addresses, telephone number, and any alternate name by which the firm conducts business and where such name is used.

BERKSHIRE GLOBAL ADVISORS LP

Doing business as BERKSHIRE GLOBAL ADVISORS LP

CRD# 124180

SEC# 8-65641

Main Office Location

527 MADISON AVENUE
3RD FLOOR
NEW YORK, NY 10022-4212

Regulated by FINRA New York Office

Mailing Address

527 MADISON AVENUE
3RD FLOOR
NEW YORK, NY 10022-4212

Business Telephone Number

212-207-1000

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Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

Direct Owners and Executive Officers

Legal Name & CRD# (if any):	JADA CORP.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	08/2018
Percentage of Ownership	25% but less than 50%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	BOMY CAPITAL CORPORATION
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	08/2018
Percentage of Ownership	10% but less than 25%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	HUMPHREY, JOHN HILDESLEY 6229742
Is this a domestic or foreign entity or an individual?	Individual
Position	MEMBER
Position Start Date	08/2018
Percentage of Ownership	10% but less than 25%

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Firm Profile

Direct Owners and Executive Officers (continued)

Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	BERKSHIRE CAPITAL CORPORATION
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	05/2004
Percentage of Ownership	5% but less than 10%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	DBR HOLDINGS INC.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	01/2025
Percentage of Ownership	5% but less than 10%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	DELAMORE FAMILY TRUST
Is this a domestic or foreign entity or an individual?	Foreign Entity
Position	MEMBER

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Firm Profile

Direct Owners and Executive Officers (continued)

Position Start Date	01/2025
Percentage of Ownership	5% but less than 10%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	HJS CORPORATION
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	08/2018
Percentage of Ownership	5% but less than 10%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	LATIN FIREBIRD CORP.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	01/2025
Percentage of Ownership	5% but less than 10%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	SUGAR MAPLE CORPORATION

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Firm Profile

Direct Owners and Executive Officers (continued)

Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	08/2018
Percentage of Ownership	5% but less than 10%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	BACH, KRISTINA NMN 4281682
Is this a domestic or foreign entity or an individual?	Individual
Position	FINOP, PFO, POO
Position Start Date	03/2022
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	BERKSHIRE GLOBAL ADVISORS GP, LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	GENERAL PARTNER
Position Start Date	08/2018
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes

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Firm Profile

Direct Owners and Executive Officers (continued)

Is this a public reporting company?	No

Legal Name & CRD# (if any):	CAMERON, ROBERT BRUCE 1146348
Is this a domestic or foreign entity or an individual?	Individual
Position	CEO
Position Start Date	05/2004
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	DELAMORE INVESTMENTS II PTY LTD
Is this a domestic or foreign entity or an individual?	Foreign Entity
Position	TRUSTEE OF DELAMORE FAMILY TRUST
Position Start Date	11/2020
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	DMK HOLDCO INC.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	05/2025
Percentage of Ownership	Less than 5%

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Firm Profile

Direct Owners and Executive Officers (continued)

Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	DUNN, GLENN MICHAEL 8048233
Is this a domestic or foreign entity or an individual?	Individual
Position	MEMBER
Position Start Date	01/2025
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	EMTEMARK, PHILIP RAYMOND 6378495
Is this a domestic or foreign entity or an individual?	Individual
Position	MEMBER
Position Start Date	01/2025
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	FRIEDMAN BDCAPITAL LIMITED

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Firm Profile

Direct Owners and Executive Officers (continued)

Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	05/2025
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	HACHIM HOLDINGS INC.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	05/2025
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	JEANB CORPORATION
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	08/2018
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

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Firm Profile

Direct Owners and Executive Officers (continued)

company?

Legal Name & CRD# (if any):	KRUKOWSKI, JULIAN THEODORE 3070439
Is this a domestic or foreign entity or an individual?	Individual
Position	CCO
Position Start Date	01/2024
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	MITCHELL, JULIE ERIN 3128001
Is this a domestic or foreign entity or an individual?	Individual
Position	COO
Position Start Date	04/2013
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	ORANJ INC.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	05/2025
Percentage of Ownership	Less than 5%

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Firm Profile

Direct Owners and Executive Officers (continued)

Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	TARTAN FARM CORP.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	08/2018
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

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Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.

Indirect Owners

Legal Name & CRD# (if any):	CAMERON, ROBERT BRUCE 1146348
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	TARTAN FARM CORP.
Relationship to Direct Owner	PRESIDENT
Relationship Established	08/2018
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	FRIEDMAN, JUSTIN A 6357798
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	FRIEDMAN BDCAPITAL LIMITED
Relationship to Direct Owner	PRESIDENT
Relationship Established	05/2025
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	HACHIM, AJMAL BEN

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Firm Profile

Indirect Owners (continued)

	6762228
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	HACHIM HOLDINGS INC.
Relationship to Direct Owner	PRESIDENT
Relationship Established	05/2025
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	HAGOPIAN, BOMY MONICA
	4681680
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	BOMY CAPITAL CORPORATION
Relationship to Direct Owner	PRESIDENT
Relationship Established	08/2018
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	JAKHETE, OPAL RAJ
	6685034
Is this a domestic or foreign entity or an individual?	Individual

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Firm Profile

Indirect Owners (continued)

Company through which indirect ownership is established	ORANJ INC.
Relationship to Direct Owner	PRESIDENT
Relationship Established	05/2025
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	KOLINSKY, DANIEL MICHAEL 6734357
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	DMK HOLDCO INC.
Relationship to Direct Owner	PRESIDENT
Relationship Established	05/2025
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	MCCARTHY, SEAN CHRISTOPHER 5528967
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	LATIN FIREBIRD CORP

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Firm Profile

Indirect Owners (continued)

Relationship to Direct Owner	PRESIDENT
Relationship Established	12/2024
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	MITCHELL, JULIE ERIN
	3128001
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	JEANB CORPORATION
Relationship to Direct Owner	PRESIDENT
Relationship Established	08/2018
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	MURPHY, DREW ROBERT
	5007855
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	JADA CORP.
Relationship to Direct Owner	PRESIDENT
Relationship Established	08/2018

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Firm Profile

Indirect Owners (continued)

Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	REYNOLDS, DAVID BENJAMIN 5181093
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	DBR HOLDINGS INC.
Relationship to Direct Owner	PRESIDENT
Relationship Established	12/2024
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	SPECTOR, MITCHELL SCOTT 1579384
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	SUGAR MAPLE CORPORATION
Relationship to Direct Owner	PRESIDENT
Relationship Established	08/2018
Percentage of Ownership	75% or more
Does this owner direct the management or policies of	Yes

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Firm Profile

Indirect Owners (continued)

the firm?

Is this a public reporting company?	No

Legal Name & CRD# (if any):	STERN, JONATHAN NMN
	4607481
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	HJS CORPORATION
Relationship to Direct Owner	PRESIDENT
Relationship Established	08/2018
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	CAMERON, ROBERT BRUCE
	1146348
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	BERKSHIRE CAPITAL CORPORATION
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	07/2005
Percentage of Ownership	50% but less than 75%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

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Firm Profile

Indirect Owners (continued)

Legal Name & CRD# (if any):	JADA CORP.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	BERKSHIRE GLOBAL ADVISORS GP, LLC
Relationship to Direct Owner	PRESIDENT
Relationship Established	05/2015
Percentage of Ownership	25% but less than 50%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	MCEVER, HAROLD BRUCE 720448
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	BERKSHIRE CAPITAL CORPORATION
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	11/1983
Percentage of Ownership	25% but less than 50%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

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Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

No information reported.

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Firm Operations

Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is currently registered with the SEC, 1 SRO and 27 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	05/12/2003

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: No

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: No

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	05/12/2003

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Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	08/20/2015
Arizona	Approved	07/07/2003
California	Approved	09/08/2005
Colorado	Approved	05/23/2003
Connecticut	Approved	03/23/2006
District of Columbia	Approved	10/14/2005
Florida	Approved	10/26/2005
Georgia	Approved	06/16/2015
Illinois	Approved	05/27/2015
Iowa	Approved	05/17/2005
Kentucky	Approved	05/16/2005
Maryland	Approved	08/11/2005
Massachusetts	Approved	06/29/2005
Minnesota	Approved	05/10/2005
Missouri	Approved	06/09/2015
New Jersey	Approved	06/26/2015
New York	Approved	02/06/2003
North Carolina	Approved	06/15/2005
Ohio	Approved	06/20/2003
Pennsylvania	Approved	06/20/2003
Puerto Rico	Approved	08/17/2021
Rhode Island	Approved	02/12/2015
South Carolina	Approved	01/04/2016
Texas	Approved	07/15/2003
Virginia	Approved	09/07/2005
Washington	Approved	05/09/2005
Wisconsin	Approved	06/14/2006

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Firm Operations

Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

This firm currently conducts 3 types of businesses.

Types of Business

Trading securities for own account
Private placements of securities
Other - PROVIDES FINANCIAL ADVICE TO CLIENTS ENGAGED IN MERGERS AND ACQUISITIONS; PERFORMS INDEPENDENT VALUATIONS; RENDERS EXPERT OPINIONS ON FINANCIAL TERMS OF TRANSACTIONS; PERFORMS STRATEGIC CONSULTING ASSIGNMENTS.

Other Types of Business

This firm does not effect transactions in commodities, commodity futures, or commodity options.
This firm does not engage in other non-securities business.

Non-Securities Business Description:

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Firm Operations

Clearing Arrangements

This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

Introducing Arrangements

This firm does not refer or introduce customers to other brokers and dealers.

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Firm Operations

Industry Arrangements

This firm does have books or records maintained by a third party.

Name:	ADVISORVAULT
Business Address:	66 WELLINGTON ST W TORONTO, CANADA M5J 2W4
Effective Date:	06/20/2024
Description:	CERTAIN BOOKS AND RECORDS ARE MAINTAINED BY ADVISORVAULT ON BEHALF OF THE APPLICANT.

This firm does not have accounts, funds, or securities maintained by a third party.

This firm does not have customer accounts, funds, or securities maintained by a third party.

Control Persons/Financing

This firm does not have individuals who control its management or policies through agreement.

This firm does not have individuals who wholly or partly finance the firm's business.

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Firm Operations

Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

This firm is, directly or indirectly:

- **in control of**
- **controlled by**
- **or under common control with**

the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.

BERKSHIRE GLOBAL ADVISORS LTD. is controlled by the firm.

Business Address:	11 HAYMARKET 2ND FLOOR LONDON, UNITED KINGDOM SW1Y 4BP
Effective Date:	05/12/2003
Foreign Entity:	Yes
Country:	UNITED KINGDOM
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	THE APPLICANT DIRECTLY CONTROLS BERKSHIRE GLOBAL ADVISORS LTD., AS BERKSHIRE GLOBAL ADVISORS LTD. IS A WHOLLY OWNED SUBSIDIARY OF THE APPLICANT.

BERKSHIRE GLOBAL ADVISORS PTY LTD. is controlled by the firm.

Business Address:	28 MARGARET STREET LEVEL 9, SUITE 2 SYDNEY, AUSTRALIA NSW 2000
Effective Date:	09/07/2010
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	THE APPLICANT DIRECTLY CONTROLS BERKSHIRE GLOBAL ADVISORS PTY LTD., AS BERKSHIRE GLOBAL ADVISORS PTY LTD. IS A WHOLLY OWNED

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Firm Operations

Organization Affiliates (continued)

SUBSIDIARY OF THE APPLICANT.

BROAD HOLLOW LLC is under common control with the firm.

Business Address:	527 MADISON AVENUE 3RD FLOOR NEW YORK, NY 10022
Effective Date:	11/05/2012
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	THE APPLICANT IS UNDER COMMON CONTROL WITH BROAD HOLLOW LLC THROUGH ROBERT CAMERON.

This firm is not directly or indirectly, controlled by the following:

- **bank holding company**
- **national bank**
- **state member bank of the Federal Reserve System**
- **state non-member bank**
- **savings bank or association**
- **credit union**
- **or foreign bank**

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Disclosure Events

All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	0	1	0

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Disclosure Event Details

What you should know about reported disclosure events:

1. **BrokerCheck provides details for any disclosure event that was reported in CRD. It also includes summary information regarding FINRA arbitration awards in cases where the brokerage firm was named as a respondent.**
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
   - A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
3. **Disclosure events in BrokerCheck reports come from different sources:**
   - Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
4. **There are different statuses and dispositions for disclosure events:**
   - A disclosure event may have a status of *pending, on appeal,* or *final.*
     - A "pending" event involves allegations that have not been proven or formally adjudicated.
     - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
     - A "final" event has been concluded and its resolution is not subject to change.
   - A final 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 involves an agreement by the parties to resolve the matter. Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
     - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
5. **You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.**

Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

Disclosure 1 of 1

Reporting Source:	Regulator
Current Status:	Final

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Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE A SUPERVISORY SYSTEM, INCLUDING WSPS, REASONABLY DESIGNED TO SUPERVISE OUTSIDE BROKERAGE ACCOUNTS. THE FINDINGS STATED THAT THE FIRM'S WSPS FAILED TO IDENTIFY ANY STEPS THE FIRM WOULD TAKE TO VERIFY THAT IT ACTUALLY RECEIVED AND REVIEWED DUPLICATE STATEMENTS FOR EACH DISCLOSED OUTSIDE BROKERAGE ACCOUNT. THE WSPS ALSO FAILED TO PROVIDE GUIDANCE ON HOW THE FIRM WOULD DETECT AND INVESTIGATE POTENTIAL SECURITIES-RELATED VIOLATIONS. IN PRACTICE, THE FIRM DID NOT HAVE A REASONABLY DESIGNED PROCESS TO ENSURE THAT IT HAD UP-TO-DATE RECORDS OF OUTSIDE BROKERAGE ACCOUNTS MAINTAINED BY ITS ASSOCIATED PERSONS OR THAT IT RECEIVED DUPLICATE STATEMENTS FOR EACH DISCLOSED OUTSIDE ACCOUNT. ALTHOUGH THE FIRM REQUIRED THAT ITS ASSOCIATED PERSONS SUBMIT ANNUAL CERTIFICATIONS DISCLOSING THEIR OUTSIDE BROKERAGE ACCOUNTS, IT HAD NO SYSTEM IN PLACE TO CONFIRM IT RECEIVED ALL REQUIRED CERTIFICATIONS. FURTHER, THE FIRM MAINTAINED A LIST OF OUTSIDE BROKERAGE ACCOUNTS BUT DID NOT REGULARLY RECONCILE THE LIST AGAINST THE DUPLICATE STATEMENTS RECEIVED BY THE FIRM. THE FIRM HAD NO SYSTEM IN PLACE TO NOTIFY ASSOCIATED PERSONS OR THEIR SUPERVISORS THAT STATEMENTS WERE MISSING AND HAD NO PROCEDURES FOR FOLLOWING UP ON MISSING STATEMENTS. IN ADDITION, THE FIRM'S SYSTEM TO REVIEW THE ACCOUNT STATEMENTS IT OBTAINED WAS NOT REASONABLY DESIGNED. THE FIRM'S MANUAL REVIEW OF HUNDREDS OF MONTHLY ACCOUNT STATEMENTS WAS PERFORMED BY A SINGLE INDIVIDUAL, WHICH WAS UNREASONABLE GIVEN THE VOLUME OF MONTHLY STATEMENTS SUBJECT TO REVIEW. THE MANUAL REVIEW ALSO DID NOT FACILITATE IDENTIFICATION OF PATTERNS OF ACTIVITY OVER TIME OR ACROSS ACCOUNTS. IN ADDITION, ALTHOUGH THE FIRM ATTEMPTED TO IDENTIFY TRADES IN SECURITIES THAT APPEARED ON THE FIRM'S WATCH LIST, THERE WERE MULTIPLE INSTANCES OF ASSOCIATED PERSONS BUYING OR SELLING WATCH LIST SECURITIES IN DISCLOSED OUTSIDE BROKERAGE ACCOUNTS THAT WERE NOT DETECTED OR SUBJECT TO FURTHER INVESTIGATION BY THE FIRM GIVEN THE FIRM'S UNREASONABLE MANUAL REVIEW.
Initiated By:	FINRA
Date Initiated:	01/23/2025
Docket/Case Number:	2020065207701
Principal Product Type:	No Product
Other Product Type(s):	

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Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	01/23/2025
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine $100,000.00
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	THE FIRM WAS CENSURED, FINED $100,000, AND REQUIRED TO CERTIFY THAT IT HAS REMEDIATED THE ISSUES IDENTIFIED IN THE AWC AND IMPLEMENTED A REASONABLY DESIGNED SUPERVISORY SYSTEM, INCLUDING WSPS. FINE PAID IN FULL ON APRIL 22, 2025.

Reporting Source:	Firm
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE A SUPERVISORY SYSTEM, INCLUDING WSPS, REASONABLY DESIGNED TO SUPERVISE OUTSIDE BROKERAGE ACCOUNTS. THE FINDINGS STATED THAT THE FIRM'S WSPS FAILED TO IDENTIFY ANY STEPS THE FIRM WOULD TAKE TO VERIFY THAT IT ACTUALLY RECEIVED AND REVIEWED DUPLICATE STATEMENTS FOR EACH DISCLOSED OUTSIDE BROKERAGE ACCOUNT. THE WSPS ALSO FAILED TO PROVIDE GUIDANCE ON HOW THE FIRM WOULD DETECT AND INVESTIGATE POTENTIAL SECURITIES-RELATED VIOLATIONS. IN PRACTICE, THE FIRM DID NOT HAVE A REASONABLY DESIGNED PROCESS TO ENSURE THAT IT HAD UP-TO-DATE RECORDS OF OUTSIDE BROKERAGE ACCOUNTS MAINTAINED BY ITS ASSOCIATED PERSONS OR THAT IT RECEIVED DUPLICATE STATEMENTS FOR EACH DISCLOSED OUTSIDE ACCOUNT. ALTHOUGH THE FIRM REQUIRED THAT ITS ASSOCIATED PERSONS SUBMIT ANNUAL CERTIFICATIONS DISCLOSING THEIR OUTSIDE BROKERAGE ACCOUNTS, IT HAD NO SYSTEM IN PLACE TO

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CONFIRM IT RECEIVED ALL REQUIRED CERTIFICATIONS. FURTHER, THE FIRM MAINTAINED A LIST OF OUTSIDE BROKERAGE ACCOUNTS BUT DID NOT REGULARLY RECONCILE THE LIST AGAINST THE DUPLICATE STATEMENTS RECEIVED BY THE FIRM. THE FIRM HAD NO SYSTEM IN PLACE TO NOTIFY ASSOCIATED PERSONS OR THEIR SUPERVISORS THAT STATEMENTS WERE MISSING AND HAD NO PROCEDURES FOR FOLLOWING UP ON MISSING STATEMENTS. IN ADDITION, THE FIRM'S SYSTEM TO REVIEW THE ACCOUNT STATEMENTS IT OBTAINED WAS NOT REASONABLY DESIGNED. THE FIRM'S MANUAL REVIEW OF HUNDREDS OF MONTHLY ACCOUNT STATEMENTS WAS PERFORMED BY A SINGLE INDIVIDUAL, WHICH WAS UNREASONABLE GIVEN THE VOLUME OF MONTHLY STATEMENTS SUBJECT TO REVIEW. THE MANUAL REVIEW ALSO DID NOT FACILITATE IDENTIFICATION OF PATTERNS OF ACTIVITY OVER TIME OR ACROSS ACCOUNTS. IN ADDITION, ALTHOUGH THE FIRM ATTEMPTED TO IDENTIFY TRADES IN SECURITIES THAT APPEARED ON THE FIRM'S WATCH LIST, THERE WERE MULTIPLE INSTANCES OF ASSOCIATED PERSONS BUYING OR SELLING WATCH LIST SECURITIES IN DISCLOSED OUTSIDE BROKERAGE ACCOUNTS THAT WERE NOT DETECTED OR SUBJECT TO FURTHER INVESTIGATION BY THE FIRM GIVEN THE FIRM'S UNREASONABLE MANUAL REVIEW.

Initiated By: FINRA

Date Initiated: 01/23/2025

Docket/Case Number: 2020065207701

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 01/23/2025

Sanctions Ordered: Censure
Monetary/Fine $100,000.00

Other Sanctions Ordered: UNDERTAKING

Sanction Details: THE FIRM WAS CENSURED, FINED $100,000, AND REQUIRED TO CERTIFY THAT IT HAS REMEDIATED THE ISSUES IDENTIFIED IN THE AWC AND IMPLEMENTED A REASONABLY DESIGNED SUPERVISORY SYSTEM, INCLUDING WSPS.

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End of Report

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