**BrokerCheck Report**

# PENTEGRA DISTRIBUTORS INC.

CRD# 26249


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Please be aware that fraudsters may link to BrokerCheck from phishing and similar scam websites, trying to steal your personal information or your money. Make sure you know who you're dealing with when investing, and contact FINRA with any concerns.

For more information read our investor alert on imposters.

**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.
-

**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.

# PENTEGRA DISTRIBUTORS INC.

CRD# 26249

SEC# 8-42445

## Main Office Location

701 WESTCHESTER AVENUE
SUITE 320E
WHITE PLAINS, NY 10604
Regulated by FINRA Woodbridge Office

## Mailing Address

701 WESTCHESTER AVENUE
SUITE 320E
WHITE PLAINS, NY 10604

## Business Telephone Number

914-821-9554

# 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 corporation.

This firm was formed in Delaware on 05/25/1989.

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
- 51 U.S. states and territories

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

This firm conducts 2 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 corporation.

This firm was formed in Delaware on 05/25/1989.

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.

**PENTEGRA DISTRIBUTORS INC.**

**Doing business as PENTEGRA DISTRIBUTORS INC.**

**CRD#** 26249

**SEC#** 8-42445

### Main Office Location

701 WESTCHESTER AVENUE
SUITE 320E
WHITE PLAINS, NY 10604

**Regulated by FINRA Woodbridge Office**

### Mailing Address

701 WESTCHESTER AVENUE
SUITE 320E
WHITE PLAINS, NY 10604

### Business Telephone Number

914-821-9554

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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):** | PENTEGRA SERVICES INC. |
| **Is this a domestic or foreign entity or an individual?** | Domestic Entity |
| **Position** | PARENT COMPANY |
| **Position Start Date** | 12/2008 |
| **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):** | ERNST, LARS GERHARD<br>5197938 |
| **Is this a domestic or foreign entity or an individual?** | Individual |
| **Position** | DIRECTOR, VP AND CCO |
| **Position Start Date** | 05/2015 |
| **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):** | FINNEGAN, KEVIN O |
| **Is this a domestic or foreign entity or an individual?** | Individual |
| **Position** | DIRECTOR |
| **Position Start Date** | 08/2023 |
| **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?** | Yes |
| **Is this a public reporting company?** | No |

| | |
|---|---|
| **Legal Name & CRD# (if any):** | WIETSMA, ERIC HANS<br>3167584 |
| **Is this a domestic or foreign entity or an individual?** | Individual |
| **Position** | DIRECTOR AND PRESIDENT |
| **Position Start Date** | 07/2022 |
| **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):** | PENTEGRA DEFINED BENEFIT PLAN FOR FINANCIAL INSTITUTIONS |
| **Is this a domestic or foreign entity or an individual?** | Domestic Entity |
| **Company through which indirect ownership is established** | PENTEGRA SERVICES INC. |
| **Relationship to Direct Owner** | SHAREHOLDER |
| **Relationship Established** | 12/2008 |
| **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 |

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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 51 U.S. states and territories.**

| Federal Regulator | Status | Date Effective |
|---|---|---|
| SEC | Approved | 08/01/1990 |

## 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: Yes

| Self-Regulatory Organization | Status | Date Effective |
|---|---|---|
| FINRA | Approved | 08/01/1990 |

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## Firm Operations

### Registrations (continued)

| U.S. States & Territories | Status | Date Effective |
|---|---|---|
| Alabama | Approved | 02/08/1999 |
| Alaska | Approved | 07/23/1998 |
| Arizona | Approved | 07/30/1998 |
| Arkansas | Approved | 01/22/2007 |
| California | Approved | 03/07/1996 |
| Colorado | Approved | 08/23/1996 |
| Connecticut | Approved | 08/31/1990 |
| Delaware | Approved | 08/01/1990 |
| District of Columbia | Approved | 04/26/1990 |
| Florida | Approved | 03/21/1991 |
| Georgia | Approved | 09/16/1996 |
| Hawaii | Approved | 01/04/1999 |
| Idaho | Approved | 08/27/1998 |
| Illinois | Approved | 04/13/1992 |
| Indiana | Approved | 03/03/1999 |
| Iowa | Approved | 09/01/1998 |
| Kansas | Approved | 05/14/1999 |
| Kentucky | Approved | 08/10/1998 |
| Louisiana | Approved | 09/03/1999 |
| Maine | Approved | 11/08/1991 |
| Maryland | Approved | 08/02/1990 |
| Massachusetts | Approved | 09/10/1990 |
| Michigan | Approved | 10/01/1996 |
| Minnesota | Approved | 09/03/1998 |
| Mississippi | Approved | 01/01/2000 |
| Missouri | Approved | 09/02/1998 |
| Montana | Approved | 08/25/1998 |
| Nebraska | Approved | 08/05/1998 |
| Nevada | Approved | 05/06/1999 |
| New Hampshire | Approved | 07/06/1990 |
| New Jersey | Approved | 09/14/1990 |
| New Mexico | Approved | 08/26/1998 |
| New York | Approved | 07/20/1990 |
| North Carolina | Approved | 09/24/1996 |
| North Dakota | Approved | 06/21/1999 |
| Ohio | Approved | 08/14/1996 |
| Oklahoma | Approved | 10/07/1998 |
| Oregon | Approved | 03/02/1999 |
| Pennsylvania | Approved | 07/23/1990 |
| Rhode Island | Approved | 08/02/1990 |
| South Carolina | Approved | 08/31/1998 |
| South Dakota | Approved | 08/25/1998 |
| Tennessee | Approved | 07/28/1999 |
| Texas | Approved | 10/15/1996 |
| Utah | Approved | 09/03/1998 |
| Vermont | Approved | 07/28/1999 |
| Virginia | Approved | 04/11/1996 |
| Washington | Approved | 08/26/1996 |
| West Virginia | Approved | 05/21/1999 |
| Wisconsin | Approved | 09/13/1996 |
| Wyoming | Approved | 05/18/1999 |

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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 2 types of businesses.**

### Types of Business

| |
|---|
| Mutual fund retailer |
| Broker or dealer selling variable life insurance or annuities |

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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 not have books or records maintained by a third party.**

**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.**

**PENTEGRA INSURANCE AGENCY INC. is under common control with the firm.**

| | |
|---|---|
| **Business Address:** | 701 WESTCHESTER AVENUE<br>SUITE 320E<br>WHITE PLAINS, NY 10604 |
| **Effective Date:** | 03/07/1996 |
| **Foreign Entity:** | No |
| **Country:** | |
| **Securities Activities:** | Yes |
| **Investment Advisory Activities:** | No |
| **Description:** | PENTEGRA INSURANCE AGENCY INC. AND PENTEGRA DISTRIBUTORS, INC. ARE WHOLLY-OWNED SUBSIDIARIES OF PENTEGRA SERVICES, INC. |

**PENTEGRA INVESTORS, INC. is under common control with the firm.**

| | |
|---|---|
| **CRD #:** | 111503 |
| **Business Address:** | 701 WESTCHESTER AVENUE<br>SUITE 320E<br>WHITE PLAINS, NY 10604 |
| **Effective Date:** | 05/25/1989 |
| **Foreign Entity:** | No |
| **Country:** | |
| **Securities Activities:** | No |
| **Investment Advisory Activities:** | Yes |
| **Description:** | PENTEGRA INVESTORS, INC. AND PENTEGRA DISTRIBUTORS, INC. ARE SUBSIDIARIES OF PENTEGRA SERVICES, INC. |

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# Firm Operations

## Organization Affiliates (continued)

**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:** | 07/02/99GK: ON JUNE 30, 1999, DISTRICT NO. 10 NOTIFIED RESPONDENTS RETIREMENT SYSTEM DISTRIBUTORS, INC. AND WILLIAM DANNECKER THAT THE LETTER OF AWC NO. C10990096 WAS ACCEPTED; THEREFORE, THEY ARE CENSURED AND FINED $3,500, JOINTLY AND SEVERALLY - (NASD RULES 2110, 3010 AND MEMBERSHIP AND REGISTRATION RULE 1120 - RESPONDENT MEMBER, ACTING THROUGH RESPONDENT DANNECKER, FAILED TO COMPLETE A TRAINING NEEDS ANALYSIS AND DEVELOP AND IMPLEMENT WRITTEN TRAINING PLANS CONCERNING THE FIRM ELEMENT OF THE CONTINUING EDUCATION REQUIREMENT (THE "FIRM ELEMENT"), AND FAILED TO MAINTAIN BOOKS AND RECORDS TO DEMONSTRATE COMPLIANCE WITH THE FIRM ELEMENT,<br>THE MATERIALS USED IN EDUCATIONAL TRAINING, AND A LIST OF DATES OF TRAINING SESSIONS; AND, FAILED TO ADOPT, MAINTAIN AND ENFORCE WRITTEN SUPERVISORY PROCEDURES DESIGNED TO ENSURE COMPLIANCE WITH THE FIRM ELEMENT). |
| **Initiated By:** | NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC. |
| **Date Initiated:** | 06/30/1999 |
| **Docket/Case Number:** | C10990096 |
| **Principal Product Type:** | Other |
| **Other Product Type(s):** | |
| **Principal Sanction(s)/Relief Sought:** | |
| **Other Sanction(s)/Relief Sought:** | |
| **Resolution:** | Acceptance, Waiver & Consent(AWC) |
| **Resolution Date:** | 06/30/1999 |
| **Sanctions Ordered:** | Censure<br>Monetary/Fine $3,500.00 |
| **Other Sanctions Ordered:** | |
| **Sanction Details:** | FINED J&S |
| **Regulator Statement** | 11-19-99, $3,500 PAID J&S ON 7/23/99, INVOICE #99-10-641 |

| | |
|---|---|
| **Reporting Source:** | Firm |
| **Current Status:** | Final |

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| | |
|---|---|
| **Allegations:** | THE NASDR MADE FINDINGS THAT FOR THE PERIOD OF JANUARY 1996 THROUGH APRIL 1997, RETIREMENT SYSTEM DISTRIBUTORS, INC., THROUGH ITS FORMER PRESIDENT, FAILED TO DEVELOP AND IMPLEMENT A FIRM ELEMENT EDUCAITONAL PROGRAM AND WRITTEN SUPERVISORY PROCEDURES IN CONNECTION WITH SUCH PROGRAM. |
| **Initiated By:** | NASD REGULATION, INC. |
| **Date Initiated:** | 06/01/1998 |
| **Docket/Case Number:** | C10990096 |
| **Principal Product Type:** | Mutual Fund(s) |
| **Other Product Type(s):** | |
| **Principal Sanction(s)/Relief Sought:** | Censure |
| **Other Sanction(s)/Relief Sought:** | FINE |
| **Resolution:** | Acceptance, Waiver & Consent(AWC) |
| **Resolution Date:** | 06/30/1999 |
| **Sanctions Ordered:** | Censure<br>Monetary/Fine $3,500.00 |
| **Other Sanctions Ordered:** | |
| **Sanction Details:** | FINED $3500.00, UNAPPORTIONED; PAID JULY 1999; NO PORTION WAIVED. |
| **Firm Statement** | RETIREMENT SYSTEM DISTRIBUTORS INC. AND ITS FORMER PRESIDENT, WILLIAM DANNECKER, HAVE ACCEPTED AND CONSENTED TO THE NASDR FINDINGS SET FORTH IN ITEM 7, WITHOUT ADMITTING OR DENYING THE ALLEGED VIOLATIONS. |

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## End of Report

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