BrokerCheck Report

SPRINKLEBROKERAGE, INC.

CRD# 285216

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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.

SPRINKLEBROKERAGE, INC.

CRD# 285216

SEC# 8-69828

Main Office Location

1968 ROWAN ST
SAN DIEGO, CA 92105
Regulated by FINRA Los Angeles Office

Mailing Address

1968 ROWAN ST
SAN DIEGO, CA 92105

Business Telephone Number

800-331-7581

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 07/05/2016.

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
- 21 U.S. states and territories

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

This firm conducts 4 types of businesses.

This firm is not affiliated with any financial or investment institutions.

This firm has 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 07/05/2016.

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.

SPRINKLEBROKERAGE, INC.

Doing business as SPRINKLEBROKERAGE, INC.

CRD# 285216

SEC# 8-69828

Main Office Location

1968 ROWAN ST
SAN DIEGO, CA 92105

Regulated by FINRA Los Angeles Office

Mailing Address

1968 ROWAN ST
SAN DIEGO, CA 92105

Business Telephone Number

800-331-7581

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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):	SPRINKLECAPITAL HOLDING, INC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	OWNER
Position Start Date	07/2016
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	EGAN, MICHAEL R 2269012
Is this a domestic or foreign entity or an individual?	Individual
Position	CCO
Position Start Date	01/2026
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):	WALLIN, JOHN ALEXANDER 6000899
Is this a domestic or foreign entity or an individual?	Individual
Position	PRESIDENT
Position Start Date	07/2016

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Firm Profile

Direct Owners and Executive Officers (continued)

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):	WALLIN, JOHN ALEXANDER 6000899
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	SPRINKLECAPITAL HOLDING, INC.
Relationship to Direct Owner	OWNER
Relationship Established	07/2016
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 21 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	05/16/2017

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	05/16/2017

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Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Arizona	Approved	09/25/2018
Arkansas	Approved	03/20/2019
California	Approved	07/19/2018
Colorado	Approved	08/21/2018
Florida	Approved	09/17/2018
Georgia	Approved	02/04/2019
Hawaii	Approved	02/14/2019
Illinois	Approved	09/11/2018
Iowa	Approved	07/02/2018
Kentucky	Approved	07/30/2018
Michigan	Approved	07/10/2018
Minnesota	Approved	10/03/2018
Mississippi	Approved	09/28/2018
Missouri	Approved	08/16/2018
Nevada	Approved	04/17/2019
New Jersey	Approved	11/14/2017
New York	Approved	06/26/2018
South Carolina	Approved	07/11/2018
Texas	Approved	08/01/2018
Utah	Approved	07/31/2018
Washington	Approved	08/10/2018

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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 4 types of businesses.

Types of Business

Broker or dealer retailing corporate equity securities over-the-counter
Mutual fund retailer
Put and call broker or dealer or option writer
Non-exchange member arranging for transactions in listed securities by exchange member

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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 refer or introduce customers to other brokers and dealers.

Name:	VELOX CLEARING LLC
CRD #:	290215
Business Address:	2400 E. KATELLA AVE., STE 725 ANAHEIM, CA 92806
Effective Date:	07/13/2020
Description:	SPRINKLEBROKERAGE, INC. HAS ENTERED INTO AN INTRODUCING/CLEARING ARRANGEMENT WITH VELOX CLEARING LLC FOR THE EXECUTION AND CLEARING OF ALL SECURITIES TRANSACTIONS AS WELL AS CUSTODY OF SECURITIES.

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Firm Operations

Industry Arrangements

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

Name: VELOX CLEARING LLC

CRD #: 290215

Business Address: 2400 E. KATELLA AVE., STE 725
ANAHEIM, CA 92806

Effective Date: 07/13/2020

Description: SPRINKLEBROKERAGE, INC. HAS ENTERED INTO AN INTRODUCING/CLEARING ARRANGEMENT WITH VELOX CLEARING LLC FOR THE EXECUTION AND CLEARING OF ALL SECURITIES TRANSACTIONS AS WELL AS CUSTODY OF SECURITIES.

This firm does have accounts, funds, or securities maintained by a third party.

Name: VELOX CLEARING LLC

CRD #: 290215

Business Address: 2400 E. KATELLA AVE., STE 725
ANAHEIM, CA 92806

Effective Date: 07/13/2020

Description: SPRINKLEBROKERAGE, INC. HAS ENTERED INTO AN INTRODUCING/CLEARING ARRANGEMENT WITH VELOX CLEARING LLC FOR THE EXECUTION AND CLEARING OF ALL SECURITIES TRANSACTIONS AS WELL AS CUSTODY OF SECURITIES.

This firm does have customer accounts, funds, or securities maintained by a third party.

Name: VELOX CLEARING LLC

CRD #: 290215

Business Address: 2400 E. KATELLA AVE., STE 725
ANAHEIM, CA 92806

Effective Date: 07/13/2020

Description: SPRINKLEBROKERAGE, INC. HAS ENTERED INTO AN INTRODUCING/CLEARING ARRANGEMENT WITH VELOX CLEARING LLC FOR THE EXECUTION AND CLEARING OF ALL SECURITIES TRANSACTIONS AS WELL AS CUSTODY OF SECURITIES.

Control Persons/Financing

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

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Firm Operations

Industry Arrangements (continued)

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 not, 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.

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 DEVELOP AND IMPLEMENT A REASONABLE ANTI-MONEY LAUNDERING (AML) PROGRAM. THE FINDINGS STATED THAT THE FIRM AND ITS AML COMPLIANCE OFFICER RESPONSIBLE FOR ALL ASPECTS OF THE FIRM'S AML PROGRAM FAILED TO DEVELOP AND IMPLEMENT AML PROCEDURES INCLUDING APPROPRIATE RISK-BASED PROCEDURES FOR CONDUCTING ONGOING CUSTOMER DUE DILIGENCE. THE FIRM'S AML PROCEDURES DID NOT SPECIFY HOW TO DETERMINE WHICH ACCOUNTS REQUIRED HEIGHTENED DUE DILIGENCE, NOR DID THEY SPECIFY WHEN OR WHAT ONGOING CUSTOMER DUE DILIGENCE WOULD BE REQUIRED. IN PRACTICE, THE FIRM'S AML COMPLIANCE OFFICER FAILED TO CONDUCT ONGOING CUSTOMER DUE DILIGENCE, AS HE WAS RESPONSIBLE FOR DOING UNDER THE FIRM'S AML PROCEDURES. THE FIRM AND ITS AML COMPLIANCE OFFICER ALSO DID NOT ESTABLISH AND IMPLEMENT AN AML PROGRAM REASONABLY DESIGNED TO DETECT AND CAUSE THE REPORTING OF SUSPICIOUS ACTIVITY. THE FIRM'S AML PROCEDURES PERTAINING TO THE DETECTION AND REPORTING OF SUSPICIOUS ACTIVITY WAS NOT TAILORED TO THE AML RISKS POSED BY THE FIRM'S CUSTOMER BASE OF ENTITIES THAT SOLICITED INVESTMENTS FROM RETAIL INVESTORS AND USED INVESTOR FUNDS TO ACQUIRE SHARES OF COMPANIES PRIOR TO THEIR INITIAL PUBLIC OFFERINGS (PRE-IPO FUNDS). IN ADDITION, THE FIRM'S AML COMPLIANCE OFFICER FAILED TO CONDUCT AML INVESTIGATIONS INTO ACTIVITY BY THE FIRM'S PRE-IPO FUND CUSTOMERS, EVEN WHEN THE FIRM'S CLEARING FIRMS INFORMED HIM OF AML CONCERNS ABOUT THOSE CUSTOMERS. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO UPDATE ITS UNIFORM APPLICATION FOR BROKER-DEALER REGISTRATION (FORM BD). WHEN THE FIRM CEASED OPERATING AT THE NEW JERSEY LOCATION THEN LISTED AS THE FIRM'S SOLE LOCATION ON ITS FORM BD AND BEGAN OPERATING OUT OF A LOCATION IN SWEDEN, THE FIRM FAILED TO UPDATE ITS FORM BD TO REFLECT THIS CHANGE. INSTEAD, THE FIRM'S CHIEF EXECUTIVE OFFICER (CEO) AND FIRM PRINCIPAL RESPONSIBLE FOR THE FIRM'S FORM BD FILED AN AMENDED FORM BD FOR THE FIRM THAT INCORRECTLY LISTED THE FIRM'S SOLE LOCATION AS NEW JERSEY. THE FIRM'S CEO LATER FILED AN AMENDED FORM BD FOR THE FIRM CORRECTLY LISTING ITS NEW MAIN OFFICE IN CALIFORNIA, WHERE THE FIRM RELOCATED ITS HEADQUARTERS.
Initiated By:	FINRA
Date Initiated:	04/27/2023
Docket/Case Number:	2021070208701
Principal Product Type:	Other

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Other Product Type(s):	PRE-IPO FUNDS
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	04/27/2023
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 $15,000.00
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	THE FIRM WAS CENSURED, FINED $15,000, AND REQUIRED TO CERTIFY THAT IT HAS REMEDIATED THE ISSUES IDENTIFIED IN THIS AWC AND IMPLEMENTED A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH FINRA RULE 3310 REGARDING THE ISSUES IDENTIFIED IN THIS AWC. FINRA IMPOSED A LOWER FINE AFTER IT CONSIDERED, AMONG OTHER THINGS, THE FIRM'S REVENUES AND FINANCIAL RESOURCES. FINE PAID IN FULL ON JUNE 21, 2023.

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 DEVELOP AND IMPLEMENT A REASONABLE ANTI-MONEY LAUNDERING (AML) PROGRAM. THE FINDINGS STATED THAT THE FIRM AND ITS AML COMPLIANCE OFFICER RESPONSIBLE FOR ALL ASPECTS OF THE FIRM'S AML PROGRAM FAILED TO DEVELOP AND IMPLEMENT AML PROCEDURES INCLUDING APPROPRIATE RISK-BASED PROCEDURES FOR CONDUCTING ONGOING CUSTOMER DUE DILIGENCE. THE FIRM'S AML PROCEDURES DID NOT SPECIFY HOW TO DETERMINE WHICH ACCOUNTS REQUIRED HEIGHTENED DUE DILIGENCE, NOR DID THEY SPECIFY WHEN OR WHAT ONGOING CUSTOMER DUE DILIGENCE WOULD BE REQUIRED. IN PRACTICE, THE FIRM'S AML COMPLIANCE OFFICER FAILED TO CONDUCT

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ONGOING CUSTOMER DUE DILIGENCE, AS HE WAS RESPONSIBLE FOR DOING UNDER THE FIRM'S AML PROCEDURES. THE FIRM AND ITS AML COMPLIANCE OFFICER ALSO DID NOT ESTABLISH AND IMPLEMENT AN AML PROGRAM REASONABLY DESIGNED TO DETECT AND CAUSE THE REPORTING OF SUSPICIOUS ACTIVITY. THE FIRM'S AML PROCEDURES PERTAINING TO THE DETECTION AND REPORTING OF SUSPICIOUS ACTIVITY WAS NOT TAILORED TO THE AML RISKS POSED BY THE FIRM'S CUSTOMER BASE OF ENTITIES THAT SOLICITED INVESTMENTS FROM RETAIL INVESTORS AND USED INVESTOR FUNDS TO ACQUIRE SHARES OF COMPANIES PRIOR TO THEIR INITIAL PUBLIC OFFERINGS (PRE-IPO FUNDS). IN ADDITION, THE FIRM'S AML COMPLIANCE OFFICER FAILED TO CONDUCT AML INVESTIGATIONS INTO ACTIVITY BY THE FIRM'S PRE-IPO FUND CUSTOMERS, EVEN WHEN THE FIRM'S CLEARING FIRMS INFORMED HIM OF AML CONCERNS ABOUT THOSE CUSTOMERS. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO UPDATE ITS UNIFORM APPLICATION FOR BROKER-DEALER REGISTRATION (FORM BD). WHEN THE FIRM CEASED OPERATING AT THE NEW JERSEY LOCATION THEN LISTED AS THE FIRM'S SOLE LOCATION ON ITS FORM BD AND BEGAN OPERATING OUT OF A LOCATION IN SWEDEN, THE FIRM FAILED TO UPDATE ITS FORM BD TO REFLECT THIS CHANGE. INSTEAD, THE FIRM'S CHIEF EXECUTIVE OFFICER (CEO) AND FIRM PRINCIPAL RESPONSIBLE FOR THE FIRM'S FORM BD FILED AN AMENDED FORM BD FOR THE FIRM THAT INCORRECTLY LISTED THE FIRM'S SOLE LOCATION AS NEW JERSEY. THE FIRM'S CEO LATER FILED AN AMENDED FORM BD FOR THE FIRM CORRECTLY LISTING ITS NEW MAIN OFFICE IN CALIFORNIA, WHERE THE FIRM RELOCATED ITS HEADQUARTERS.

Initiated By:	FINRA
Date Initiated:	04/27/2023
Docket/Case Number:	2021070208701
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:	04/27/2023
Sanctions Ordered:	Censure Monetary/Fine $15,000.00

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Other Sanctions Ordered: UNDERTAKING

Sanction Details: THE FIRM WAS CENSURED, FINED $15,000, AND REQUIRED TO CERTIFY THAT IT HAS REMEDIATED THE ISSUES IDENTIFIED IN THIS AWC AND IMPLEMENTED A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH FINRA RULE 3310 REGARDING THE ISSUES IDENTIFIED IN THIS AWC. FINRA IMPOSED A LOWER FINE AFTER IT CONSIDERED, AMONG OTHER THINGS, THE FIRM'S REVENUES AND FINANCIAL RESOURCES.

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End of Report

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