

BrokerCheck Report

ROCKEFELLER FINANCIAL LLC

CRD# 291361

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Firm Profile	2 - 7
Firm History	8
Firm Operations	9 - 20
Disclosure Events	21



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.

-

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.](http://www.finra.org)



ROCKEFELLER FINANCIAL LLC

CRD# 291361

SEC# 8-70054

Main Office Location

45 ROCKEFELLER PLAZA
FLOOR 5
NEW YORK, NY 10111
Regulated by FINRA New York Office

Mailing Address

45 ROCKEFELLER PLAZA
FLOOR 5
NEW YORK, NY 10111

Business Telephone Number

212-549-5100

This firm is a brokerage firm and an investment adviser firm. For more information about investment adviser firms, visit the SEC's Investment Adviser Public Disclosure website at:

<https://www.adviserinfo.sec.gov>

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 limited liability company.

This firm was formed in Delaware on 10/20/2017.

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
- 53 U.S. states and territories

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

This firm conducts 13 types of businesses.

This firm is affiliated with 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



Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Delaware on 10/20/2017.

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.

ROCKEFELLER FINANCIAL LLC

Doing business as ROCKEFELLER FINANCIAL LLC

CRD# 291361

SEC# 8-70054

Main Office Location

45 ROCKEFELLER PLAZA
FLOOR 5
NEW YORK, NY 10111

Regulated by FINRA New York Office

Mailing Address

45 ROCKEFELLER PLAZA
FLOOR 5
NEW YORK, NY 10111

Business Telephone Number

212-549-5100

Other Names of this Firm

Name

ROCKEFELLER CAPITAL MANAGEMENT

Where is it used

AK, AL, AR, AZ, CA,
CO, CT, DC, DE, FL,
GA, HI, IA, ID, IL, IN,
KS, KY, LA, MA, MD,
ME, MI, MN, MO,
MS, MT, NC, ND, NE,
NH, NJ, NM, NV, NY,
OH, OK, OR, PA, PR,
RI, SC, SD, TN, TX,

UT, VA, VI, VT, WA,
WI, WV, WY



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): RFS OPCO LLC ("OPCO")

Is this a domestic or foreign entity or an individual? Domestic Entity

Position MEMBER

Position Start Date 10/2017

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): ALEXANDER, MARK DAVID
2202934

Is this a domestic or foreign entity or an individual? Individual

Position PRINCIPAL OPERATIONS OFFICER

Position Start Date 05/2022

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

Legal Name & CRD# (if any): KOWALSKI, DEIRDRE PATTEN
1357509

Is this a domestic or foreign entity or an individual? Individual

Position PRINCIPAL FINANCIAL OFFICER

Position Start Date 01/2023



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? No

Is this a public reporting company? No

Legal Name & CRD# (if any): MIRZA, RIZWAN MOHAMMAD
5080469

Is this a domestic or foreign entity or an individual? Individual

Position CHIEF COMPLIANCE OFFICER

Position Start Date 07/2024

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): MORIARTY, EDMOND NICHOLAS
1744318

Is this a domestic or foreign entity or an individual? Individual

Position CO-CHIEF EXECUTIVE OFFICER

Position Start Date 12/2025

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): OUTLAW, MICHAEL WAYNE

Firm Profile



Direct Owners and Executive Officers (continued)

2760690

Is this a domestic or foreign entity or an individual? Individual

Position CO-CHIEF EXECUTIVE OFFICER

Position Start Date 12/2025

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



Firm Profile

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

Indirect Owners

Legal Name & CRD# (if any):	ROCKEFELLER CAPITAL MANAGEMENT L.P. ("RCM")
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	RFS OPCO LLC
Relationship to Direct Owner	MEMBER
Relationship Established	03/2018
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
<hr/>	
Legal Name & CRD# (if any):	ROCKEFELLER CAPITAL MANAGEMENT GENERAL PARTNER L.L.C. ("RCMGP")
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	ROCKEFELLER CAPITAL MANAGEMENT L.P.
Relationship to Direct Owner	GENERAL PARTNER
Relationship Established	10/2017
Percentage of Ownership	Other General Partners
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Firm History

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

No information reported.





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 53 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	10/10/2018

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: Yes

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	10/10/2018



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective	U.S. States & Territories	Status	Date Effective
Alabama	Approved	11/07/2018	North Carolina	Approved	10/26/2018
Alaska	Approved	10/25/2018	North Dakota	Approved	11/09/2018
Arizona	Approved	10/11/2018	Ohio	Approved	10/22/2018
Arkansas	Approved	11/27/2018	Oklahoma	Approved	10/29/2018
California	Approved	10/22/2018	Oregon	Approved	10/29/2018
Colorado	Approved	10/26/2018	Pennsylvania	Approved	10/18/2018
Connecticut	Approved	10/25/2018	Puerto Rico	Approved	01/11/2019
Delaware	Approved	10/29/2018	Rhode Island	Approved	10/22/2018
District of Columbia	Approved	11/05/2018	South Carolina	Approved	10/24/2018
Florida	Approved	11/07/2018	South Dakota	Approved	10/17/2018
Georgia	Approved	10/17/2018	Tennessee	Approved	11/08/2018
Hawaii	Approved	10/24/2018	Texas	Approved	11/29/2018
Idaho	Approved	10/16/2018	Utah	Approved	10/15/2018
Illinois	Approved	11/28/2018	Vermont	Approved	11/28/2018
Indiana	Approved	11/27/2018	Virgin Islands	Approved	11/14/2018
Iowa	Approved	10/10/2018	Virginia	Approved	11/28/2018
Kansas	Approved	11/01/2018	Washington	Approved	11/27/2018
Kentucky	Approved	10/15/2018	West Virginia	Approved	12/12/2018
Louisiana	Approved	10/22/2018	Wisconsin	Approved	10/25/2018
Maine	Approved	11/02/2018	Wyoming	Approved	10/31/2018
Maryland	Approved	10/29/2018			
Massachusetts	Approved	11/15/2018			
Michigan	Approved	10/29/2018			
Minnesota	Approved	03/11/2019			
Mississippi	Approved	10/24/2018			
Missouri	Approved	12/04/2018			
Montana	Approved	10/11/2018			
Nebraska	Approved	12/18/2018			
Nevada	Approved	10/23/2018			
New Hampshire	Approved	12/13/2018			
New Jersey	Approved	11/27/2018			
New Mexico	Approved	12/11/2018			
New York	Approved	10/16/2018			



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 13 types of businesses.

Types of Business

- Broker or dealer retailing corporate equity securities over-the-counter
- Broker or dealer selling corporate debt securities
- Underwriter or selling group participant (corporate securities other than mutual funds)
- Mutual fund retailer
- U S. government securities broker
- Municipal securities broker
- Broker or dealer selling variable life insurance or annuities
- Broker or dealer selling oil and gas interests
- Put and call broker or dealer or option writer
- Investment advisory services
- Broker or dealer selling tax shelters or limited partnerships in primary distributions
- Broker or dealer selling tax shelters or limited partnerships in the secondary market
- Private placements of securities

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:	NATIONAL FINANCIAL SERVICES LLC
CRD #:	13041
Business Address:	155 SEAPORT BOULEVARD, MAIL ZONE ZW9A BOSTON, MA 02210
Effective Date:	10/11/2018
Description:	APPLICANT HAS A FULLY DISCLOSED CLEARING ARRANGEMENT WITH NATIONAL FINANCIAL SERVICES.

Firm Operations

Industry Arrangements



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

Name:	STARCOMPLIANCE (STAR)
Business Address:	9200 CORPORATE BOULEVARD, SUITE 440 ROCKVILLE, MD 20850
Effective Date:	08/12/2024
Description:	CERTAIN BOOKS AND RECORDS ARE MAINTAINED ON BEHALF OF THE APPLICANT
Name:	NICE ACTIMIZE
Business Address:	221 RIVER ST., 10TH FLOOR HOBOKEN, NJ 07030
Effective Date:	09/18/2023
Description:	CERTAIN BOOKS AND RECORDS ARE MAINTAINED ON BEHALF OF THE APPLICANT.
Name:	MICROSOFT CORPORATION
Business Address:	ONE MICROSOFT WAY REDMOND, WA 98052
Effective Date:	12/06/2019
Description:	THE ENTITY HOLDS SOME OF THE BOOKS AND RECORDS OF THE FIRM.
Name:	REGED
Business Address:	2100 GATEWAY CENTRE BLVD SUITE 200 MORRISVILLE, NC 27560
Effective Date:	06/26/2019
Description:	CERTAIN BOOKS AND RECORDS ARE MAINTAINED HERE, INCLUDING THE FIRM ELEMENT TRAINING FILES.
Name:	SMARSH, INC.
Business Address:	851 SW 6TH AVE SUITE 800 PORTLAND, OR 97204
Effective Date:	06/07/2018
Description:	CERTAIN BOOKS AND RECORDS OF APPLICANT ARE MAINTAINED BY

Firm Operations



Industry Arrangements (continued)

SMARSH ON BEHALF OF APPLICANT

Name: NATIONAL FINANCIAL SERVICES LLC
CRD #: 13041
Business Address: 155 SEAPORT BOULEVARD, MAIL ZONE ZW9A
 BOSTON, MA 02210
Effective Date: 10/11/2018
Description: CERTAIN BOOKS AND RECORDS OF APPLICANT ARE MAINTAINED BY ITS CLEARING FIRM ON BEHALF OF APPLICANT

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

Name: NATIONAL FINANCIAL SERVICES LLC
CRD #: 13041
Business Address: 155 SEAPORT BOULEVARD, MAIL ZONE ZW9A
 BOSTON, MA 02210
Effective Date: 10/11/2018
Description: CERTAIN FUNDS ARE HELD BY APPLICANT'S CLEARING FIRM ON BEHALF OF APPLICANT

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

Name: NATIONAL FINANCIAL SERVICES LLC
CRD #: 13041
Business Address: 155 SEAPORT BOULEVARD, MAIL ZONE ZW9A
 BOSTON, MA 02210
Effective Date: 10/11/2018
Description: APPLICANT CLEARS ALL TRANSACTIONS ON A FULLY DISCLOSED BASIS THROUGH NATIONAL FINANCIAL SERVICES LLC

Control Persons/Financing

This firm does have individuals who control its management or policies through agreement.

Name: OTT, DAVID CHRISTOPHER
CRD #: 4857588
Business Address: 600 WASHINGTON BOULEVARD, 11TH FLOOR
 STAMFORD, CT 06901
Effective Date: 03/01/2018
Description: MR. OTT IS A CONTROLLING PRINCIPAL OF VIKING GLOBAL PARTNERS

Firm Operations



Industry Arrangements (continued)

LLC, THE GENERAL PARTNER OF VIKING GLOBAL INVESTORS LP ("VIKING GLOBAL"). VIKING GLOBAL INDIRECTLY CONTROLS THE MANAGEMENT OR POLICIES OF ROCKEFELLER CAPITAL MANAGEMENT L.P., THE ULTIMATE PARENT COMPANY OF R&CO., THROUGH ITS INDIRECT OWNERSHIP INTERESTS. THESE INTERESTS ARE HELD VIA PRIVATE FUNDS AND OTHER INTERMEDIATE ENTITIES THAT VIKING GLOBAL CONTROLS. NONE OF THESE ENTITIES INDIVIDUALLY OWNS 25% OR MORE OF ROCKEFELLER CAPITAL MANAGEMENT L.P.

Name:	HALVORSEN, OLE ANDREAS JR
CRD #:	2087763
Business Address:	600 WASHINGTON BOULEVARD, 11TH FLOOR STAMFORD, CT 06901
Effective Date:	03/18/2018
Description:	MR. HALVORSEN IS A CONTROLLING PRINCIPAL OF VIKING GLOBAL PARTNERS LLC, THE GENERAL PARTNER OF VIKING GLOBAL INVESTORS LP ("VIKING GLOBAL"). VIKING GLOBAL INDIRECTLY CONTROLS THE MANAGEMENT OR POLICIES OF ROCKEFELLER CAPITAL MANAGEMENT L.P. ("RCM"), THE ULTIMATE PARENT COMPANY OF R&CO., THROUGH ITS INDIRECT OWNERSHIP INTERESTS. THESE INTERESTS ARE HELD VIA PRIVATE FUNDS AND OTHER INTERMEDIATE ENTITIES THAT VIKING GLOBAL CONTROLS. NONE OF THESE ENTITIES INDIVIDUALLY OWNS 25% OR MORE OF RCM.

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



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.**

VIKING GLOBAL PARTNERS LLC controls the firm.

Business Address:	600 WASHINGTON BOULEVARD, 11TH FLOOR STAMFORD, CT 06901
Effective Date:	03/01/2018
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	VIKING GLOBAL PARTNERS LLC IS THE GENERAL PARTNER OF VIKING GLOBAL INVESTORS LP ("VIKING GLOBAL"). VIKING GLOBAL INDIRECTLY CONTROLS THE MANAGEMENT OR POLICIES OF ROCKEFELLER CAPITAL MANAGEMENT L.P., THE ULTIMATE PARENT COMPANY OF R&CO., THROUGH ITS INDIRECT OWNERSHIP INTERESTS. THESE INTERESTS ARE HELD VIA PRIVATE FUNDS AND OTHER INTERMEDIATE ENTITIES THAT VIKING GLOBAL CONTROLS. NONE OF THESE ENTITIES INDIVIDUALLY OWNS 25% OR MORE OF ROCKEFELLER CAPITAL MANAGEMENT L.P.

ROCKEFELLER STRATEGIC SERVICES LLC is under common control with the firm.

Business Address:	45 ROCKEFELLER PLAZA; FLOOR 5 NEW YORK, NY 10019
Effective Date:	04/04/2018
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No

Firm Operations



Organization Affiliates (continued)

Description: ROCKEFELLER STRATEGIC SERVICES LLC AND ROCKEFELLER FINANCIAL LLC ARE UNDER COMMON CONTROL THROUGH OPCO (REPORTED ON SCHEDULE A)

ROCKEFELLER TRUST COMPANY, N.A. is under common control with the firm.

Business Address: 45 ROCKEFELLER PLAZA; FLOOR 5
NEW YORK, NY 10111

Effective Date: 08/01/2009

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: ROCKEFELLER TRUST COMPANY, N.A. AND ROCKEFELLER FINANCIAL LLC ARE UNDER COMMON CONTROL THROUGH RCM (REPORTED ON SCHEDULE B)

THE ROCKEFELLER TRUST COMPANY (DELAWARE) is under common control with the firm.

Business Address: 1201 N MARKET ST
WILMINGTON, DE 19801

Effective Date: 12/10/1997

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: THE ROCKEFELLER TRUST COMPANY (DELAWARE) AND ROCKEFELLER FINANCIAL LLC ARE UNDER COMMON CONTROL THROUGH RCM (REPORTED ON SCHEDULE B)

ROCKEFELLER FUND MANAGERS, LLC is under common control with the firm.

Business Address: 45 ROCKEFELLER PLAZA; FLOOR 5
NEW YORK, NY 10019

Effective Date: 12/21/1998

Foreign Entity: No

Firm Operations



Organization Affiliates (continued)

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: ROCKEFELLER FUND MANAGERS, LLC AND ROCKEFELLER FINANCIAL LLC ARE UNDER COMMON CONTROL THROUGH RCM (REPORTED ON SCHEDULE B)

ROCKEFELLER PARTNERSHIP SERVICES LLC is under common control with the firm.

Business Address: 45 ROCKEFELLER PLAZA; FLOOR 5
NEW YORK, NY 10111

Effective Date: 03/01/2018

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: ROCKEFELLER PARTNERSHIP SERVICES LLC IS UNDER COMMON CONTROL WITH ROCKEFELLER FINANCIAL LLC THROUGH OPCO (REPORTED ON SCHEDULE A)

ROCKEFELLER CAPITAL MANAGEMENT INSURANCE SERVICES, LLC ("RCMIS") is under common control with the firm.

Business Address: 45 ROCKEFELLER PLAZA; FLOOR 5
NEW YORK, NY 10111

Effective Date: 03/01/2018

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: ROCKEFELLER CAPITAL MANAGEMENT INSURANCE SERVICES, LLC IS UNDER COMMON CONTROL WITH ROCKEFELLER FINANCIAL LLC. THROUGH RFS OPCO REPORTED ON SCHEDULE A.

Firm Operations**Organization Affiliates (continued)**

ROCKEFELLER CAPITAL MANAGEMENT is under common control with the firm.

CRD #: 294197

Business Address: 45 ROCKEFELLER PLAZA; FLOOR 5
NEW YORK, NY 10111

Effective Date: 03/01/2018

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: ROCKEFELLER & CO LLC (RIA/ CRD 294197) AND ROCKEFELLER FINANCIAL LLC (BD / CRD 291361) ARE UNDER COMMON CONTROL THROUGH RFS OPCO LLC.

ROCKEFELLER CAPITAL MANAGEMENT L.P. ("RCM") controls the firm.

Business Address: 45 ROCKEFELLER PLAZA
5TH FLOOR
NEW YORK, NY 10111

Effective Date: 03/01/2018

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: ROCKEFELLER CAPITAL MANAGEMENT LP (REPORTED ON SCHEDULE B) INDIRECTLY OWNS ROCKEFELLER FINANCIAL LLC.

VIKING GLOBAL INVESTORS LP controls the firm.

CRD #: 132272

Business Address: 55 RAILROAD AVENUE
GREENWICH, CT 06830

Effective Date: 10/20/2017

Foreign Entity: No

Firm Operations



Organization Affiliates (continued)

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: VIKING GLOBAL INVESTORS LP ("VIKING GLOBAL") INDIRECTLY CONTROLS THE MANAGEMENT OR POLICIES OF ROCKEFELLER CAPITAL MANAGEMENT L.P., THE ULTIMATE PARENT COMPANY OF R&CO., THROUGH ITS INDIRECT OWNERSHIP INTERESTS. THESE INTERESTS ARE HELD VIA PRIVATE FUNDS AND OTHER INTERMEDIATE ENTITIES THAT VIKING GLOBAL INVESTORS LP CONTROLS. NONE OF THESE ENTITIES INDIVIDUALLY OWNS 25% OR MORE OF ROCKEFELLER CAPITAL MANAGEMENT L.P.

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



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

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



Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO DISCLOSE CERTAIN MARK-UP AND MARK-DOWN INFORMATION ON RETAIL CUSTOMER CONFIRMATIONS FOR MUNICIPAL SECURITIES TRANSACTIONS AND CORPORATE AND AGENCY DEBT SECURITIES TRANSACTIONS. THE FINDINGS STATED THAT THE FIRM FAILED TO INCLUDE ANY INFORMATION RELATED TO MARK-UPS AND MARK-DOWNS FOR MOST OF THE AFFECTED RETAIL CUSTOMER CONFIRMATIONS. IN SOME INSTANCES, HOWEVER, THE FIRM INCLUDED THE DOLLAR AMOUNT OF THE MARK-UP OR AND MARK-DOWN ON THE RETAIL CUSTOMER CONFIRMATION BUT DID NOT INCLUDE THE MARK-UP OR MARK-DOWN AS A PERCENTAGE OF THE PREVAILING MARKET PRICE. DURING THIS TIME, THE FIRM'S REPRESENTATIVES GENERALLY PLACED ORDERS TO BUY AND SELL SECURITIES THROUGH ITS CLEARING FIRM'S ONLINE ORDER ENTRY INTERFACE. THE DISCLOSURE FAILURE HERE AROSE FROM A CODING ISSUE RELATED TO ORDERS THAT WERE PLACED BY THE FIRM'S REPRESENTATIVES OVER THE PHONE WITH THE FIRM'S CLEARING FIRM. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE DISCLOSURE REQUIREMENTS. THE FIRM DID NOT HAVE ANY POLICIES OR PROCEDURES IN PLACE REGARDING THE DISCLOSURES REQUIRED ON RETAIL CUSTOMER CONFIRMATIONS. IN PRACTICE, THE FIRM DID NOT CONDUCT ANY REVIEW OF RETAIL CUSTOMER CONFIRMATIONS TO CONFIRM THEY INCLUDED THE REQUISITE REQUIRED DISCLOSURES. THE FIRM HAS REVISED ITS PROCEDURES TO ADDRESS THE REQUIREMENTS OF MSRB AND FINRA RULES AND TO PROVIDE FOR A REVIEW OF THE CONTENT OF CUSTOMER CONFIRMATIONS.

Initiated By: FINRA
Date Initiated: 01/19/2024
Docket/Case Number: [2021071489101](#)
Principal Product Type: Debt - Municipal
Other Product Type(s):
Principal Sanction(s)/Relief Sought:
Other Sanction(s)/Relief Sought:
Resolution: Acceptance, Waiver & Consent(AWC)
Resolution Date: 01/19/2024



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:	
Sanction Details:	THE FIRM WAS CENSURED AND FINED \$100,000. FINE PAID IN FULL ON MARCH 5, 2024.
<hr/>	
Reporting Source:	Firm
Current Status:	Final
Allegations:	ON JANUARY 19, 2024, THE FIRM ENTERED INTO A LETTER OF ACCEPTANCE, WAIVER AND CONSENT FOR FAILING TO DISCLOSE CERTAIN MARK-UP AND MARK-DOWN INFORMATION ON RETAIL CUSTOMER CONFIRMATIONS FOR THE TIME PERIOD JUNE 2020 TO AUGUST 2021 FOR MUNICIPAL SECURITIES TRANSACTIONS AND CORPORATE AND AGENCY DEBT SECURITIES TRANSACTIONS AND FOR FAILING TO ESTABLISH, MAINTAIN, AND ENFORCE A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE DISCLOSURE REQUIREMENTS IN VIOLATION OF MSRB RULE G-27 AND FINRA RULES 3110 AND 2010.
Initiated By:	FINRA
Date Initiated:	08/06/2021
Docket/Case Number:	2021071489101
Principal Product Type:	Debt - Municipal
Other Product Type(s):	DEBT - CORPORATE DEBT - GOVERNMENT
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	FINE
Resolution:	Acceptance, Waiver & Consent(AWC)



Resolution Date: 01/19/2024

Sanctions Ordered: Censure
Monetary/Fine \$100,000.00

Other Sanctions Ordered:

Sanction Details: THE APPLICANT PAID THE FINE OF \$100,000 ON FEBRUARY 1, 2024.

End of Report



This page is intentionally left blank.