BrokerCheck Report

STIRLINGSHIRE INVESTMENTS

CRD# 310576

Section Title	Page(s)

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.

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.

STIRLINGSHIRE INVESTMENTS

CRD# 310576

SEC# 8-70616

Main Office Location

15 W 38TH ST
SUITE 704
NEW YORK CITY, NY 10018
Regulated by FINRA New York Office

Mailing Address

15 W 38TH ST
SUITE 704
NEW YORK CITY, NY 10018

Business Telephone Number

877-600-7026

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 08/14/2020.

Its fiscal year ends in June.

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 4 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 08/14/2020.

Its fiscal year ends in June.

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.

STIRLINGSHIRE BD LLC

Doing business as STIRLINGSHIRE INVESTMENTS

CRD# 310576

SEC# 8-70616

Main Office Location

15 W 38TH ST
SUITE 704
NEW YORK CITY, NY 10018

Regulated by FINRA New York Office

Mailing Address

15 W 38TH ST
SUITE 704
NEW YORK CITY, NY 10018

Business Telephone Number

877-600-7026

Other Names of this Firm

Name	Where is it used
STIRLINGSHIRE INVESTMENTS	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):	STIRLINGSHIRE INVESTMENTS, INC.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	100% OWNER
Position Start Date	08/2020
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):	SAKOL, DANIEL SCOTT 2813237
Is this a domestic or foreign entity or an individual?	Individual
Position	FINOP
Position Start Date	07/2021
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):	WOODS, STEVEN MACKIE 5715598
Is this a domestic or foreign entity or an individual?	Individual
Position	CEO & CCO
Position Start Date	08/2020

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

Firm Profile

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

Indirect Owners

No information reported.

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	06/08/2022

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	06/08/2022

Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	05/03/2023
Alaska	Approved	03/29/2023
Arizona	Approved	04/05/2023
Arkansas	Approved	04/24/2023
California	Approved	09/02/2022
Colorado	Approved	09/21/2022
Connecticut	Approved	09/07/2022
Delaware	Approved	04/04/2023
District of Columbia	Approved	04/05/2023
Florida	Approved	01/03/2023
Georgia	Approved	05/16/2023
Hawaii	Approved	05/09/2023
Idaho	Approved	03/31/2023
Illinois	Approved	02/16/2023
Indiana	Approved	04/14/2023
Iowa	Approved	01/19/2023
Kansas	Approved	08/31/2022
Kentucky	Approved	04/07/2023
Louisiana	Approved	03/27/2023
Maine	Approved	04/10/2023
Maryland	Approved	12/06/2022
Massachusetts	Approved	11/23/2022
Michigan	Approved	09/26/2022
Minnesota	Approved	03/14/2023
Mississippi	Approved	03/23/2023
Missouri	Approved	10/12/2022
Montana	Approved	04/10/2023
Nebraska	Approved	04/05/2023
Nevada	Approved	03/27/2023
New Hampshire	Approved	04/28/2023
New Jersey	Approved	10/28/2022
New Mexico	Approved	04/25/2023
New York	Approved	07/09/2022

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	04/28/2023
North Dakota	Approved	04/25/2023
Ohio	Approved	03/27/2023
Oklahoma	Approved	04/05/2023
Oregon	Approved	03/28/2023
Pennsylvania	Approved	04/18/2023
Puerto Rico	Approved	05/09/2023
Rhode Island	Approved	03/23/2023
South Carolina	Approved	04/04/2023
South Dakota	Approved	03/23/2023
Tennessee	Approved	03/31/2023
Texas	Approved	10/19/2022
Utah	Approved	04/03/2023
Vermont	Approved	03/27/2023
Virgin Islands	Approved	04/25/2023
Virginia	Approved	04/26/2023
Washington	Approved	03/23/2023
West Virginia	Approved	04/13/2023
Wisconsin	Approved	09/01/2022
Wyoming	Approved	04/14/2023

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

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:	APEX CLEARING CORPORATION
CRD #:	13071
Business Address:	ONE DALLAS CENTER 350 N. ST. PAUL, SUITE 1300 DALLAS, TX 75201
Effective Date:	10/08/2020
Description:	UPON OBTAINING THE NECESSARY REGULATORY APPROVAL, STIRLINGSHIRE INTENDS TO ESTABLISH A CLEARING RELATIONSHIP WITH APEX. BASED ON STIRLINGSHIRE'S CURRENT UNDERSTANDING OF THE SITUATION, APEX WOULD ACT AS A CLEARING BROKER FOR COUNTERPARTY, SUBJECT TO APEX OBTAINING ANY ADDITIONAL NECESSARY INTERNAL APPROVALS AND SUBJECT TO THE PARTIES BEING ABLE TO AGREE ON CONTRACTUAL TERMS.

Firm Operations

Industry Arrangements

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

Name:	APEX CLEARING CORPORATION
CRD #:	13071
Business Address:	ONE DALLAS CENTER 350 N. ST. PAUL, SUITE 1300 DALLAS, TX 75201
Effective Date:	10/08/2020
Description:	UPON OBTAINING THE NECESSARY REGULATORY APPROVAL, STIRLINGSHIRE INTENDS TO ESTABLISH A CLEARING RELATIONSHIP WITH APEX. BASED ON STIRLINGSHIRE'S CURRENT UNDERSTANDING OF THE SITUATION, APEX WOULD ACT AS A CLEARING BROKER FOR COUNTERPARTY, SUBJECT TO APEX OBTAINING ANY ADDITIONAL NECESSARY INTERNAL APPROVALS AND SUBJECT TO THE PARTIES BEING ABLE TO AGREE ON CONTRACTUAL TERMS.

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

Name:	APEX CLEARING CORPORATION
CRD #:	13071
Business Address:	ONE DALLAS CENTER 350 N. ST. PAUL, SUITE 1300 DALLAS, TX 75201
Effective Date:	10/08/2020
Description:	UPON OBTAINING THE NECESSARY REGULATORY APPROVAL, STIRLINGSHIRE INTENDS TO ESTABLISH A CLEARING RELATIONSHIP WITH APEX. BASED ON STIRLINGSHIRE'S CURRENT UNDERSTANDING OF THE SITUATION, APEX WOULD ACT AS A CLEARING BROKER FOR COUNTERPARTY, SUBJECT TO APEX OBTAINING ANY ADDITIONAL NECESSARY INTERNAL APPROVALS AND SUBJECT TO THE PARTIES BEING ABLE TO AGREE ON CONTRACTUAL TERMS.

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

Name:	APEX CLEARING CORPORATION
CRD #:	13071
Business Address:	ONE DALLAS CENTER 350 N. ST. PAUL, SUITE 1300 DALLAS, TX 75201

Firm Operations

Industry Arrangements (continued)

Effective Date: 10/08/2020

Description: UPON OBTAINING THE NECESSARY REGULATORY APPROVAL, STIRLINGSHIRE INTENDS TO ESTABLISH A CLEARING RELATIONSHIP WITH APEX. BASED ON STIRLINGSHIRE'S CURRENT UNDERSTANDING OF THE SITUATION, APEX WOULD ACT AS A CLEARING BROKER FOR COUNTERPARTY, SUBJECT TO APEX OBTAINING ANY ADDITIONAL NECESSARY INTERNAL APPROVALS AND SUBJECT TO THE PARTIES BEING ABLE TO AGREE ON CONTRACTUAL TERMS.

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.

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.

STIRLINGSHIRE INVESTMENTS is under common control with the firm.

CRD #:	327779
Business Address:	15 W 38TH ST #704 NEW YORK CITY, NY 10018
Effective Date:	09/07/2023
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	SAME OWNERSHIP, STIRLINGSHIRE INVESTMENTS INC.

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 VIOLATED RULE 15L-1 OF THE SECURITIES EXCHANGE ACT OF 1934 (REG BI) BY FAILING TO ESTABLISH, MAINTAIN, AND ENFORCE A REASONABLE SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES (WSPS), CONCERNING RECOMMENDATIONS OF INVERSE OR LEVERAGED EXCHANGE TRADED FUNDS (NT-ETFS). THE FINDINGS STATED THAT THREE FIRM REGISTERED REPRESENTATIVES RECOMMENDED THAT MORE THAN 25 RETAIL CUSTOMERS PURCHASE NT-ETFS, YET THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN POLICIES OR PROCEDURES REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH REG BI'S CARE OBLIGATION WITH RESPECT TO ITS RECOMMENDATIONS OF NT-ETFS, AND TO SUPERVISE SUCH RECOMMENDATIONS. THE FIRM'S WSPS PROHIBITED PURCHASES OF NT-ETFS IN CUSTOMER ACCOUNTS AND INSTRUCTED SUPERVISORS TO CANCEL ALL NT-ETF PURCHASES IN CUSTOMER ACCOUNTS, HOWEVER THE FIRM DID NOT ENFORCE THAT PROHIBITION, NOR DID IT PUT IN PLACE ANY ALERTS, EXCEPTION REPORTS, OR OTHER SUPERVISORY TOOLS OR PROCEDURES TO IDENTIFY AND REVIEW NT-ETF RECOMMENDATIONS. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO FILE WITH FINRA OFFERING MATERIALS FOR TWO PRIVATE PLACEMENT OFFERINGS ISSUED BY THE FIRM'S PARENT COMPANY THAT A REGISTERED REPRESENTATIVE OF THE FIRM SOLD TO 21 INVESTORS. TWO YEARS AFTER THE LAST SALE, THE FIRM FILED THE OFFERING MATERIALS AT ISSUE WITH FINRA.
Initiated By:	FINRA
Date Initiated:	01/22/2026
Docket/Case Number:	2023077093401
Principal Product Type:	Other
Other Product Type(s):	INVERSE OR LEVERAGED EXCHANGE TRADED FUNDS
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	N/A
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	01/22/2026

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 $40,000.00
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	THE FIRM WAS CENSURED, FINED $40,000, AND REQUIRED TO COMPLY WITH THE UNDERTAKING ENUMERATED IN THIS AWC. FINE PAID IN FULL ON APRIL 14, 2026.

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 VIOLATED RULE 15L-1 OF THE SECURITIES EXCHANGE ACT OF 1934 (REG BI) BY FAILING TO ESTABLISH, MAINTAIN, AND ENFORCE A REASONABLE SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES (WSPS), CONCERNING RECOMMENDATIONS OF INVERSE OR LEVERAGED EXCHANGE TRADED FUNDS (NT-ETFS). THE FINDINGS STATED THAT THREE FIRM REGISTERED REPRESENTATIVES RECOMMENDED THAT MORE THAN 25 RETAIL CUSTOMERS PURCHASE NT-ETFS, YET THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WRITTEN POLICIES OR PROCEDURES REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH REG BI'S CARE OBLIGATION WITH RESPECT TO ITS RECOMMENDATIONS OF NT-ETFS, AND TO SUPERVISE SUCH RECOMMENDATIONS. THE FIRM'S WSPS PROHIBITED PURCHASES OF NT-ETFS IN CUSTOMER ACCOUNTS AND INSTRUCTED SUPERVISORS TO CANCEL ALL NT-ETF PURCHASES IN CUSTOMER ACCOUNTS, HOWEVER THE FIRM DID NOT ENFORCE THAT PROHIBITION, NOR DID IT PUT IN PLACE ANY ALERTS, EXCEPTION REPORTS, OR OTHER SUPERVISORY TOOLS OR PROCEDURES TO IDENTIFY AND REVIEW NT-ETF RECOMMENDATIONS. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO FILE WITH FINRA OFFERING MATERIALS FOR TWO PRIVATE PLACEMENT OFFERINGS ISSUED BY THE FIRM'S PARENT COMPANY THAT A REGISTERED REPRESENTATIVE OF THE FIRM SOLD TO 21 INVESTORS. TWO YEARS AFTER THE LAST SALE, THE FIRM FILED THE OFFERING MATERIALS AT ISSUE WITH FINRA
Initiated By:	FINANCIAL INDUSTRY REGULATORY AUTHORITY (FINRA)

Date Initiated:	01/22/2026
Docket/Case Number:	2023077093401
Principal Product Type:	Other
Other Product Type(s):	EXCHANGE TRADED PRODUCTS, PRIVATE PLACEMENTS
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	UNDERTAKING
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	01/22/2026
Sanctions Ordered:	Monetary/Fine $40,000.00
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	FINE: $40,000. LEVIED AGAINST APPLICANT (STIRLINGSHIRE BD LLC). FULL AMOUNT DUE WITHIN 60 DAYS.
Firm Statement	FINRA AWC ACCEPTED 01/22/2026. MATTER NO. 2023077093401. SANCTIONS: CENSURE AND $40,000 FINE. UNDERTAKING: WITHIN 90 DAYS OF THE NOTICE OF ACCEPTANCE, A SENIOR MANAGEMENT REGISTERED PRINCIPAL MUST CERTIFY REMEDIATION AND IMPLEMENTATION OF A SUPERVISORY SYSTEM, INCLUDING WSPS, REASONABLY DESIGNED FOR COMPLIANCE WITH EXCHANGE ACT RULE 15L-1(A)(1) AND FINRA RULES 3110 AND 2010 REGARDING INVERSE OR LEVERAGED ETFS.

End of Report

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