

BrokerCheck Report

BROOKWOOD SECURITIES PARTNERS, LLC

CRD# 35187

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Firm Profile	2 - 6
Firm History	7
Firm Operations	8 - 13
Disclosure Events	14



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:
 - o 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
 - o 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.



BROOKWOOD SECURITIES PARTNERS, LLC

CRD# 35187

SEC# 8-46627

Main Office Location

138 CONANT STREET
BEVERLY, MA 01915
Regulated by FINRA Boston Office

Mailing Address

138 CONANT STREET
BEVERLY, MA 01915

Business Telephone Number

978-720-7500

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 05/17/1993.

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
- 46 U.S. states and territories

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

This firm conducts 3 types of businesses.

This firm is not affiliated with any 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



Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Delaware on 05/17/1993.

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.

BROOKWOOD SECURITIES PARTNERS, LLC

Doing business as BROOKWOOD SECURITIES PARTNERS, LLC

CRD# 35187

SEC# 8-46627

Main Office Location

138 CONANT STREET
BEVERLY, MA 01915

Regulated by FINRA Boston Office

Mailing Address

138 CONANT STREET
BEVERLY, MA 01915

Business Telephone Number

978-720-7500



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):	BROOKWOOD FINANCIAL PARTNERS, LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	SOLE MEMBER
Position Start Date	05/1993
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):	AYLES, ERICKA LEIGH 6530897
Is this a domestic or foreign entity or an individual?	Individual
Position	FINOP
Position Start Date	11/2015
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):	STROUSS, MARCIA GREILICH 1365779
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF COMPLIANCE OFFICER
Position Start Date	01/2016

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):	TRKLA, THOMAS NICHOLAS 1238366
Is this a domestic or foreign entity or an individual?	Individual
Position	CHAIRMAN, CHIEF EXECUTIVE OFFICER
Position Start Date	05/1993
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):	TRKLA, THOMAS NICHOLAS 1238366
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	BROOKWOOD FINANCIAL PARTNERS, LLC
Relationship to Direct Owner	NON-MANAGING MEMBER
Relationship Established	05/1993
Percentage of Ownership	50% but less than 75%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	TRKLA, THOMAS NICHOLAS 1238366
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	BROOKWOOD FINANCIAL CO., INC.
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	05/1993
Percentage of Ownership	50% but less than 75%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	BROOKWOOD FINANCIAL CO., INC.
--	-------------------------------

Firm Profile



Indirect Owners (continued)

Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	BROOKWOOD FINANCIAL PARTNERS, LLC
Relationship to Direct Owner	MANAGING MEMBER
Relationship Established	05/1993
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.

This firm was previously:	BROOKWOOD SECURITIES PARTNERS, L.P.
Date of Succession:	12/01/2010
Predecessor CRD#:	35187
Predecessor SEC#:	8-46627
Description	THE FIRM CONVERTED FROM A DELAWARE LP TO A DELAWARE LLC ON 12/1//10 AS PERMITTED BY THE DELAWARE LLC ACT. THE FIRM REDEEMED THE 1% GENERAL PARTNER INTEREST, AND CONVERTED THE LIMITED PARTNER'S INTEREST TO A MEMBERSHIP INTEREST (THE FIRM'S OWNER ALSO CONVERTED FROM A LP TO A LLC). THE CONVERSION DID NOT CHANGE THE OWNERSHIP OR CONTROL OF THE FIRM. THE OPERATIONS AND MANAGEMENT OF THE FIRM REMAINED THE SAME. THE FIRM'S TAX ID IS THE SAME, AND THERE WERE NO CHANGES IN ASSETS AND LIABILITIES.



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 46 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	12/03/1993

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	04/14/1994



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	07/18/2011
Alaska	Approved	06/09/2011
Arizona	Approved	11/13/1997
Arkansas	Approved	03/14/2017
California	Approved	08/18/1995
Colorado	Approved	03/12/2012
Connecticut	Limited	09/05/1995
Delaware	Approved	04/14/1994
District of Columbia	Approved	12/31/1993
Florida	Approved	05/27/1994
Georgia	Approved	06/04/2002
Hawaii	Approved	07/18/2002
Idaho	Approved	03/08/2017
Illinois	Approved	04/18/1994
Indiana	Approved	04/07/1994
Iowa	Approved	03/07/2017
Kansas	Approved	10/16/2017
Kentucky	Approved	08/27/2012
Louisiana	Approved	04/11/2011
Maine	Approved	01/23/1996
Maryland	Approved	04/25/1994
Massachusetts	Approved	04/15/1994
Michigan	Approved	05/06/1994
Minnesota	Approved	04/18/1994
Missouri	Approved	03/21/2017
Montana	Approved	09/15/2011
Nebraska	Approved	09/29/2017
Nevada	Approved	04/09/2003
New Hampshire	Approved	05/27/1997
New Jersey	Approved	06/10/1994
New Mexico	Approved	03/14/2017
New York	Approved	04/27/1994
North Carolina	Approved	07/11/2006

U.S. States & Territories	Status	Date Effective
Ohio	Approved	05/02/1994
Oklahoma	Approved	06/01/1995
Pennsylvania	Approved	04/20/1994
Rhode Island	Approved	04/22/1994
South Carolina	Approved	05/27/1997
South Dakota	Approved	02/22/2012
Tennessee	Approved	09/07/2016
Texas	Limited	06/03/1994
Utah	Approved	03/28/2007
Vermont	Approved	04/29/1998
Virginia	Approved	02/24/1994
Washington	Approved	06/20/2011
Wisconsin	Approved	10/04/1996

Firm Operations



Types of Business

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

This firm currently conducts 3 types of businesses.

Types of Business

Real estate syndicator

Broker or dealer selling tax shelters or limited partnerships in primary distributions

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 not refer or introduce customers to other brokers and dealers.

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.



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



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:**
 - o 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:**
 - o 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:**
 - o 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.
 - o 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: NASD RULES 2110, 3010 - BROOKWOOD SECURITIES PARTNERS, L.P., ACTING THROUGH A PRINCIPAL, FAILED TO ESTABLISH, MAINTAIN AND ENFORCE A REASONABLY DESIGNED SUPERVISORY SYSTEM AND WRITTEN PROCEDURES WITH RESPECT TO REGISTRATION OF PERSONNEL ENGAGED IN THE SECURITIES BUSINESS. THE FIRM'S SUPERVISORY PROCEDURES DID NOT PROVIDE FOR REASONABLE FOLLOW UP AND REVIEW BY FIRM COMPLIANCE OR REGISTRATION PERSONNEL AS TO THE STATUS OF FORM U4S FILED WITH WEB CRD. AS A RESULT, THE FIRM FAILED TO MONITOR THE STATUS OF THE FORM U4 APPLICATION AND ENSURE THAT REGISTRATION HAD BECOME EFFECTIVE FOR EACH OF ITS REPRESENTATIVES.

Initiated By: FINRA

Date Initiated: 09/30/2009

Docket/Case Number: 2008011708601

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 09/30/2009

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: Monetary/Fine \$5,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTION AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS FINED \$5,000.

Reporting Source: Firm

Current Status: Final



Allegations: FINRA ALLEGED VIOLATIONS OF NASD RULES 2110 AND 3010 DUE TO THE FAILURE TO MONITOR THE STATUS OF FORM U4S TO ENSURE THAT REGISTRATION HAD BECOME EFFECTIVE FOR EACH OF THE FIRM'S REPRESENTATIVES. FINRA ALLEGED THAT THE FIRM, ACTING THROUGH MR. TRKLA, AS ITS PRINCIPAL, DID NOT ESTABLISH, MAINTAIN AND ENFORCE A REASONABLY DESIGNED SUPERVISORY SYSTEM AND PROCEDURES RELATING TO THE REGISTRATION OF THE FIRM'S PERSONNEL; AND THAT THE FIRM'S PROCEDURES DID NOT PROVIDE FOR REASONABLE FOLLOW UP AND REVIEW BY PERSONNEL TO CONFIRM THE STATUS OF FORM U4S FILED WITH WEBCRD, THE FINRA REGISTRATION SYSTEM.

Initiated By: FINRA

Date Initiated: 09/30/2009

Docket/Case Number: 2008011708601

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 09/30/2009

Sanctions Ordered: Monetary/Fine \$5,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTION AND TO THE ENTRY OF FINDINGS. THE TOTAL FINE AMOUNT WAS \$5000.00, ALL OF WHICH WAS LEVIED AGAINST APPLICANT. THE PAYMENT WAS MADE ON OCTOBER 5, 2009. NO PORTION OF THE PENALTY WAS WAIVED.

End of Report



This page is intentionally left blank.