

BrokerCheck Report

SENTINEL BROKERS COMPANY, INC.

CRD# 40305

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When communicating online or investing with any professional, make sure you know who you're dealing with. <u>Imposters</u> might link to sites like BrokerCheck from <u>phishing</u> or similar scam websites, or through <u>social media</u>, 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
 - 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.

www.finra.org/brokercheck User Guidance

SENTINEL BROKERS COMPANY, INC.

CRD# 40305

SEC# 8-49005

Main Office Location

102 XANADU PLACE JUPITER, FL 33477 Regulated by FINRA Florida Office

Mailing Address

102 XANADU PLACE JUPITER, FL 33477

Business Telephone Number

561-406-2242

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 New York on 01/01/1998. 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
- 4 Self-Regulatory Organizations
- 5 U.S. states and territories

This firm conducts 8 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

This firm is classified as a corporation.

This firm was formed in New York on 01/01/1998.

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.

SENTINEL BROKERS COMPANY, INC.

Doing business as SENTINEL BROKERS COMPANY, INC.

CRD# 40305

SEC# 8-49005

Main Office Location

102 XANADU PLACE JUPITER, FL 33477

Regulated by FINRA Florida Office

Mailing Address

102 XANADU PLACE JUPITER, FL 33477

Business Telephone Number

561-406-2242



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): SENTINEL BROKERS LLC

Is this a domestic or foreign entity or an individual?

Domestic Entity

Position SHAREHOLDER

Position Start Date 05/2021

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): SED CAPITAL PTE LTD

Is this a domestic or foreign entity or an individual?

Foreign Entity

Position OWNER Position Start Date 05/2023

Percentage of Ownership 10% but less than 25%

Does this owner direct the management or policies of the firm?

No

Is this a public reporting company?

No

Legal Name & CRD# (if any): LAWLESS, JOSEPH MATHEW

1783307

Is this a domestic or foreign entity or an individual?

Individual

Position CEO, CCO

Position Start Date 10/1996

Percentage of Ownership Less than 5%

Direct Owners and Executive Officers (continued)

Does this owner direct the management or policies of

Yes

the firm?

Is this a public reporting company?

No



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

FINCA

Indirect Owners

No information reported.

Firm History

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

FINCA

No information reported.





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, 4 SROs and 5 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	09/24/1996

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

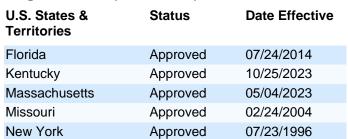
A broker-dealer and government securities broker or dealer: Yes

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	09/24/1996
NYSE American LLC	Approved	09/11/2025
Nasdaq Stock Market	Approved	05/24/2021
New York Stock Exchange	Approved	09/11/2025

Registrations (continued)





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 8 types of businesses.

Types of Business

Exchange member engaged in exchange commission business other than floor activities

Broker or dealer making inter-dealer markets in corporation securities over-the-counter

Broker or dealer retailing corporate equity securities over-the-counter

Broker or dealer selling corporate debt securities

U S. government securities broker

Municipal securities dealer

Municipal securities broker

Trading securities for own account





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: 350 N ST PAUL STREET

SUITE 1300

DALLAS, TX 75201

Effective Date: 12/19/2024

Description: APEX CLEARS ALL OF SBC'S TRADES ON A FULLY DISCLOSED BASIS.

APEX ALSO HOLDS FUNDS OF SBC IN THE FORM OF A CLEARING

DEPOSIT AND INVESTMENT ACCOUNTS.

Industry Arrangements



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

Name: APEX CLEARING CORPORATION

CRD #: 13071

Business Address: 350 N ST PAUL STREET

SUITE 1300

DALLAS, TX 75201

Effective Date: 12/19/2024

Description: APEX MAINTAINS BOOKS AND RECORDS REQUISITE OF A CLEARING

ENTITY.

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.

Organization Affiliates

FINCA

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:

- 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:
 - 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:

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO MAKE AND PRESERVE ACCURATE BOOKS AND RECORDS AND FILED INACCURATE FOCUS REPORTS. THE FINDINGS STATED THAT AN AFFILIATE OF THE FIRM TRANSFERRED \$1,000,000 TO IT AND LATER MADE ADDITIONAL TRANSFERS TO THE FIRM TOTALING \$364,412. THE FIRM TREATED THE \$1.364.412 AS OWNERSHIP EQUITY IN ITS NET CAPITAL CALCULATIONS AND FOCUS REPORTS, DESPITE REFERRING TO THE FUNDS AS LOAN PROCEEDS IN OTHER DOCUMENTS AND DESPITE A LACK OF CONTEMPORANEOUS DOCUMENTATION DEMONSTRATING THAT THE FUNDS WERE OWNERSHIP EQUITY RATHER THAN LOAN PROCEEDS. SUBSEQUENTLY, THE FIRM AMENDED ITS CERTIFICATE OF INCORPORATION TO ALLOW IT TO ISSUE ADDITIONAL PREFERRED STOCK. THE FIRM THEREAFTER ISSUED FOURTEEN SHARES OF PREFERRED STOCK TO A SECOND AFFILIATE OF THE FIRM, IN EXCHANGE FOR THE \$1,364,412 THAT THE FIRST AFFILIATE PREVIOUSLY PROVIDED TO THE FIRM. THE FIRM SHOULD NOT HAVE TREATED THE FUNDS AS OWNERSHIP **EQUITY WITHOUT CONTEMPORANEOUS DOCUMENTATION SUPPORTING** THAT TREATMENT, RENDERING THE FIRM'S NET CAPITAL COMPUTATIONS INACCURATE UNTIL THE FIRM WAS ABLE TO PROVE THAT THE FUNDS WERE OWNERSHIP EQUITY AS DEMONSTRATED BY THE ISSUANCE OF THE PREFERRED STOCK. DURING THAT PERIOD. THE FIRM ALSO FILED FIVE FOCUS REPORTS THAT INACCURATELY STATED THE FIRM'S MINIMUM REQUIRED NET CAPITAL AND EXCESS NET CAPITAL DUE TO THE INACCURATE TREATMENT OF THE FUNDS. THE FINDINGS ALSO STATED THAT THE FIRM CONDUCTED A SECURITIES BUSINESS WHILE FAILING TO MAINTAIN ITS REQUIRED NET CAPITAL. BECAUSE THE FIRM IMPROPERLY TREATED THE \$1,364.412 FROM THE FIRST AFFILIATE AS OWNERSHIP EQUITY, THE FIRM MISCALCULATED ITS REQUIRED MINIMUM NET CAPITAL AND EXCESS NET CAPITAL. THE FIRM CONTINUED TO CONDUCT A SECURITIES BUSINESS DURING THE PERIOD WHEN IT LACKED THE REQUIRED MINIMUM NET CAPITAL. THE FINDINGS ALSO INCLUDED THAT THE FIRM FAILED TO FILE WITH FINRA AND THE SEC THE REQUIRED NOTICES OF ITS NET CAPITAL DEFICIENCIES.

Initiated By: FINRA

Date Initiated: 02/10/2025

Docket/Case Number: 2022077353201

Principal Product Type: Equity Listed (Common & Preferred Stock)

Other Product Type(s):

Principal Sanction(s)/Relief

Other

Sought:



Other Sanction(s)/Relief

Sought:

N/A

Resolution: Acceptance, Waiver & Consent(AWC)

Nο

Resolution Date: 02/10/2025

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or

deceptive conduct?

Sanctions Ordered: Censure

Monetary/Fine \$25,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$25,000.

Reporting Source: Firm

Current Status: Final

Allegations: THIS IS ALL RELATED TO A PERIOD OF CONSECUTIVE MONTHS STARTING

IN THE SPRING OF 2022 FOR THE SAME INCIDENT WHEREIN THE FIRM

ALLEGEDLY FILED INACCURATE FOCUS REPORTS, CONDUCTED

BUSINESS WITHOUT PROPER NET CAPITAL AND FAILED TO FILE NOTICE

OF A NET CAPITAL DEFICIENCY.

Initiated By: FINRA

Date Initiated: 02/04/2025

Docket/Case Number: 2022077353201

Principal Product Type:

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Censure

No Product

Other Sanction(s)/Relief

Sought:

FINE.

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 02/10/2025

Sanctions Ordered: Censure



Monetary/Fine \$25,000.00

Other Sanctions Ordered: N/A

Sanction Details: N/A

Firm Statement THE FIRM HAD INQUIRIES FROM FINRA REGARDING A CLASSIFICATION OF

MONEY ADDED TO THE FIRM IN 2022, A COUPLE MORE INQUIRIES INTO THE SAME ISSUE IN 2023, AND A COUPLE MORE YET IN 2024 AND INTO 2025. EACH TIME, THE FIRM PROVIDED A TIMELY RESPONSE COMPLETE WITH DOCUMENTS THAT WE BELIEVED SATISFIED THE QUERY. AFTER THE LATEST INQUIRY WAS ANSWERED, FINRA CONCLUDED THEIR BELIEF THAT OUR INITIAL CLASSIFICATION OF THE MONEY LEFT US WITH THESE DEFICIENCIES. HAVING ALREADY BEEN DISCUSSING THIS SAME INQUIRY A NUMBER OF YEARS, THE FIRM AGREED TO THE AWC. TO BE CLEAR, THE FIRM HAS NO RETAIL CUSTOMERS AND ALL CAPITAL AT RISK IS IT'S OWN.

www.finra.org/brokercheck

End of Report



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