

BrokerCheck Report

PACTOLUS CAPITAL PARTNERS

CRD# 7518

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Firm Profile	2 - 5
Firm History	6
Firm Operations	7 - 12
Disclosure Events	13



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.



PACTOLUS CAPITAL PARTNERS

CRD# 7518

SEC# 8-21979

Main Office Location

8614 WESTWOOD CENTER DRIVE
SUITE 620
VIENNA, VA 22182
Regulated by FINRA Philadelphia Office

Mailing Address

8614 WESTWOOD CENTER DRIVE
SUITE 620
VIENNA, VA 22182

Business Telephone Number

571-297-6348

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 07/12/2011.

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
- 14 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 affiliated with 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	2



Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Delaware on 07/12/2011.

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.

PACTOLUS SECURITIES, LLC

Doing business as PACTOLUS CAPITAL PARTNERS

CRD# 7518

SEC# 8-21979

Main Office Location

8614 WESTWOOD CENTER DRIVE
SUITE 620
VIENNA, VA 22182

Regulated by FINRA Philadelphia Office

Mailing Address

8614 WESTWOOD CENTER DRIVE
SUITE 620
VIENNA, VA 22182

Business Telephone Number

571-297-6348



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):	PACTOLUS HOLDINGS LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	05/2015
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):	HARTER, ALAN MITCHELL 2165788
Is this a domestic or foreign entity or an individual?	Individual
Position	CEO / MANAGING MEMBER
Position Start Date	05/2015
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	

Legal Name & CRD# (if any):	SADZEWICZ, GERY JOSEPH 1090963
Is this a domestic or foreign entity or an individual?	Individual
Position	CCO
Position Start Date	05/2015

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

Firm Profile

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



Indirect Owners

Legal Name & CRD# (if any):	HARTER, ALAN MITCHELL 2165788
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	PACTOLUS HOLDINGS LLC
Relationship to Direct Owner	MEMBER
Relationship Established	05/2011
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



Firm History

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

This firm was previously:	DFP EQUITIES, INC.
Date of Succession:	11/25/2015
Predecessor CRD#:	7518
Description	PACTOLUS SECURITIES, LLC IS SUCCEEDING AS THE REGISTERED BROKER-DEALER. ALL ASSETS AND LIABILITIES ARE BEING ASSUMED BY THE SUCCESSOR. PLEASE BE ADVISED THERE WAS NO CHANGE OF CONTROL AT THE TIME OF THE SUCCESSION. THE SUCCESSION AMENDMENT FILED ON 10/29/2015 WITH THE SUCCESSION DATE OF 05/28/2015 WAS FILED IN ERROR. THE AMENDMENT FILED ON 11/25/2015 WITH THE SUCCESSION DATE OF 11/25/2015 IS THE CORRECT AND ONLY SUCCESSION BY AMENDMENT DATE.

This firm was previously:	DFP EQUITIES, INC.
Date of Succession:	11/25/2015
Predecessor CRD#:	7518
Description	PACTOLUS SECURITIES, LLC IS SUCCEEDING AS THE REGISTERED BROKER-DEALER. ALL ASSETS AND LIABILITIES ARE BEING ASSUMED BY THE SUCCESSOR. PLEASE BE ADVISED THERE WAS NO CHANGE OF CONTROL OR OWNERSHIP AT THE TIME OF THE SUCCESSION. THE SUCCESSION AMENDMENT FILED ON 10/29/2015 WITH THE SUCCESSION DATE OF 05/28/2015 WAS FILED IN ERROR. THE AMENDMENT FILED ON 11/25/2015 WITH THE SUCCESSION DATE OF 11/25/2015 IS THE CORRECT AND ONLY SUCCESSION BY AMENDMENT DATE.



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 14 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	12/06/1977

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	12/28/1977

Firm Operations



Registrations (continued)

U.S. States & Territories	Status	Date Effective
California	Approved	08/30/2019
Delaware	Approved	10/11/2019
District of Columbia	Approved	09/23/2019
Florida	Approved	09/21/2017
Illinois	Approved	11/19/2019
Indiana	Approved	10/20/1981
Maryland	Approved	09/19/2019
Michigan	Approved	12/01/2016
Missouri	Approved	03/02/2023
New York	Approved	09/03/2019
Ohio	Approved	04/01/2021
Texas	Approved	12/03/2019
Virginia	Approved	10/14/2014
Wisconsin	Approved	04/01/2021

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

Mutual fund retailer
Broker or dealer selling variable life insurance or annuities
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, 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.

PACTOLUS PRIVATE WEALTH MANAGEMENT LLC is under common control with the firm.

CRD #:	155195
Business Address:	6862 ELM STREET SUITE 620 MCLEAN, VA 22101
Effective Date:	06/01/2015
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	PACTOLUS PRIVATE WEALTH MANAGEMENT LLC AND PACTOLUS SECURITIES, LLC ARE UNDER COMMON CONTROL BY PACTOLUS HOLDINGS LLC.

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	2	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 2

Reporting Source: Regulator

Current Status: Final



Allegations: SEC RULE 17A-3, NASD RULES 1022(C), 2110, 3110 - RESPONDENT, ACTING THROUGH AN EMPLOYEE, OPERATED A SECURITIES BUSINESS WITHOUT EMPLOYING A PROPERLY REGISTERED FINANCIAL AND OPERATIONS PRINCIPAL ("FINOP"). THE FINDINGS STATED THAT THE FIRM, ACTING THROUGH AN EMPLOYEE, FAILED TO PREPARE A GENERAL LEDGER AND A TRIAL BALANCE DURING THE PERIOD OF FEBRUARY 2003 THROUGH OCTOBER 2007.

Initiated By: FINRA

Date Initiated: 02/25/2008

Docket/Case Number: 2007007331101

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: 02/25/2008

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 \$2,500.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, DFP EQUITIES, INC., CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE, THE FIRM IS CENSURED AND FINED \$2,500, JOINTLY AND SEVERALLY.

Reporting Source: Firm

Current Status: Final

Allegations: SEC RULE 17A-3, NASD RULES 1022(C), 2110, 3110 - RESPONDENT, ACTING THROUGH AN EMPLOYEE, OPERATED A SECURITIES BUSINESS WITHOUT



EMPLOYING A PROPERLY REGISTERED FINANCIAL AND OPERATIONS PRINCIPAL ("FINOP"). THE FINDINGS STATED THAT THE FIRM, ACTING THROUGH AN EMPLOYEE, FAILED TO PREPARE A GENERAL LEDGER AND A TRIAL BALANCE DURING THE PERIOD OF FEBRUARY 2003 THROUGH OCTOBER 2007.

Initiated By: FINRA

Date Initiated: 02/25/2008

Docket/Case Number: 2007007331101

Principal Product Type: Mutual Fund(s)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: CENSURE

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 02/25/2008

Sanctions Ordered: Censure
Monetary/Fine \$2,500.00

Other Sanctions Ordered:

Sanction Details: A CENSURE AGAINST DFP AND LINDBOE.
\$2,500 JOINT AND SEVERAL FINE AGAINST DFP AND LINDBOE; AND A
\$22,500 ADDITIONAL FINE AGAINST LINDBOE.

Disclosure 2 of 2

Reporting Source: Regulator

Current Status: Final

Allegations: ARTICLE III, SECTION 1 OF THE RULES OF FAIR PRACTICE -
FAILED TO FILE ITS FOCUS PART I REPORT ON A TIMELY BASIS.

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

Date Initiated: 04/25/1990

Docket/Case Number: CHI-1280-AWC

Principal Product Type: No Product

Other Product Type(s):



Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 04/25/1990

Sanctions Ordered: Monetary/Fine \$250.00

Other Sanctions Ordered:

Sanction Details: THE LETTER OF ACCEPTANCE, WAIVER AND CONSENT NO. CHI-1280-AWC (DISTRICT NO. 8) SUBMITTED BY RESPONDENT DFP EQUITIES, INC. WAS ACCEPTED; THEREFORE, THE FIRM IS CENSURED AND FINED \$250.

Reporting Source: Firm

Current Status: Final

Allegations: LATE FOCUS REPORT

Initiated By: NASD

Date Initiated: 04/25/1990

Docket/Case Number: CHI-1280-AWC

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought: FINE

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 04/25/1990

Sanctions Ordered: Censure
Monetary/Fine \$250.00

Other Sanctions Ordered:

Sanction Details: FIRM WAS CENSURED AND FINED. FINE PAID

End of Report



This page is intentionally left blank.