

BrokerCheck Report

THOMAS FRANCIS SULLIVAN

CRD# 1145000

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Broker Qualifications	2 - 5
Registration and Employment History	7 - 8
Disclosure Events	9



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.

**THOMAS F. SULLIVAN**

CRD# 1145000

Currently employed by and registered with the following Firm(s):

- B ALEXANDER CAPITAL, L.P.**
 10 DRS JAMES PARKER BLVD
 SUITE 202
 RED BANK, NJ 07701
 CRD# 40077
 Registered with this firm since: 04/07/2014

Report Summary for this Broker

This report summary provides an overview of the broker's professional background and conduct. Additional information can be found in the detailed report.

Broker Qualifications

This broker is registered with:

- 1 Self-Regulatory Organization
- 1 U.S. state or territory

This broker has passed:

- 7 Principal/Supervisory Exams
- 5 General Industry/Product Exams
- 2 State Securities Law Exams

Registration History

This broker was previously registered with the following securities firm(s):

- B ARIVE CAPITAL MARKETS**
 CRD# 8060
 STATEN ISLAND, NY
 03/2015 - 06/2024
- B MCCracken Advisory Partners Corporation**
 CRD# 35533
 MINNEAPOLIS, MN
 01/2012 - 03/2014
- B LPS PARTNERS INC.**
 CRD# 155246
 NEW YORK, NY
 05/2013 - 08/2013

Disclosure Events

All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

Are there events disclosed about this broker? **Yes**

The following types of disclosures have been reported:

Type	Count
Regulatory Event	1
Customer Dispute	1
Termination	1



Broker Qualifications

Registrations

This section provides the self-regulatory organizations (SROs) and U.S. states/territories the broker is currently registered and licensed with, the category of each license, and the date on which it became effective. This section also provides, for every brokerage firm with which the broker is currently employed, the address of each branch where the broker works.

This individual is currently registered with 1 SRO and is licensed in 1 U.S. state or territory through his or her employer.

Employment 1 of 1

Firm Name: **ALEXANDER CAPITAL, L.P.**
 Main Office Address: **10 DRS JAMES PARKER BLVD
 SUITE 202
 RED BANK, NJ 07701**
 Firm CRD#: **40077**

	SRO	Category	Status	Date
B	FINRA	General Securities Principal	Approved	04/07/2014
B	FINRA	General Securities Representative	Approved	04/07/2014
B	FINRA	Municipal Securities Principal	Approved	04/07/2014
B	FINRA	Municipal Securities Representative	Approved	04/07/2014
B	FINRA	Operations Professional	Approved	04/07/2014
B	FINRA	Registered Options Principal	Approved	04/07/2014
B	FINRA	Financial and Operations Principal	Approved	11/27/2019

	U.S. State/ Territory	Category	Status	Date
B	New York	Agent	Approved	12/05/2016

Branch Office Locations

ALEXANDER CAPITAL, L.P.
 10 DRS JAMES PARKER BLVD
 SUITE 202
 RED BANK, NJ 07701



Broker Qualifications

Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below. A passed exam or exam waiver does not permit a broker to do business without an active SRO or state registration.

This individual has passed 7 principal/supervisory exams, 5 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
B Financial and Operations Principal Examination	Series 27	12/12/2019
B Municipal Securities Principal Examination	Series 53	12/17/2011
B Registered Options Principal Examination	Series 4	11/29/2011
B General Securities Principal Examination	Series 24	11/11/2011
B Compliance Officer Examination	Series 14	03/01/2001
B General Securities Sales Supervisor - General Module Examination	Series 10	02/05/2001
B General Securities Sales Supervisor - Options Module Examination	Series 9	01/16/2001

General Industry/Product Exams

Exam	Category	Date
B Operations Professional Examination	Series 99TO	01/02/2023
B Municipal Securities Representative Examination	Series 52TO	01/02/2023
B Securities Industry Essentials Examination	SIE	10/01/2018
B Limited Representative-Equity Trader Exam	Series 55	01/17/2002
B General Securities Representative Examination	Series 7	06/21/1986

State Securities Law Exams

Exam	Category	Date
B IA Uniform Combined State Law Examination	Series 66	01/30/2015

Broker Qualifications



Industry Exams this Broker has Passed, continued State Securities Law Exams Continued

Exam	Category	Date
<div>B</div> Uniform Securities Agent State Law Examination	Series 63	03/23/1994

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at www.finra.org/brokerqualifications/registeredrep/.

Broker Qualifications



Professional Designations

This section details that the representative has reported **0** professional designation(s).

No information reported.



Registration and Employment History

Registration History

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
B 03/2015 - 06/2024	ARIVE CAPITAL MARKETS	8060	STATEN ISLAND, NY
B 01/2012 - 03/2014	MCCRACKEN ADVISORY PARTNERS CORPORATION	35533	MINNEAPOLIS, MN
B 05/2013 - 08/2013	LPS PARTNERS INC.	155246	NEW YORK, NY
B 03/2012 - 04/2013	ATON SECURITIES INC.	156377	NEW YORK, NY
B 09/2011 - 12/2011	U.S. SECURITIES, INTL. CORP.	11238	NEW YORK, NY
B 09/2004 - 05/2007	M.J. WHITMAN LLC	122481	SARATOGA SPRINGS, NY
B 08/1998 - 09/2004	TRADITION (GLOBAL CLEARING) INC.	42813	NEW YORK, NY
B 09/1998 - 09/2004	TRADITION ASIEL SECURITIES INC.	28269	NEW YORK, NY
B 03/1995 - 07/1998	SAKURA SECURITIES (U.S.A.), INCORPORATED	23516	CHICAGO, IL
B 02/1994 - 03/1995	LEHMAN BROTHERS INC.	7506	NEW YORK, NY
B 06/1986 - 04/1989	WERTHEIM SCHRODER & CO. INCORPORATED	6112	NEW YORK, NY

Employment History

This section provides up to 10 years of an individual broker's employment history as reported by the individual broker on the most recently filed Form U4.

Please note that the broker is required to provide this information only while registered with FINRA or a national securities exchange and the information is not updated via Form U4 after the broker ceases to be registered. Therefore, an employment end date of "Present" may not reflect the broker's current employment status.

Employment	Employer Name	Position	Investment Related	Employer Location
04/2015 - Present	THOMAS F SULLIVAN CPA PLLC	CPA/COMPLIANCE CONSULTANT	N	FLORAL PARK, NY, United States
04/2014 - Present	ALEXANDER CAPITAL LP	CHIEF FINANCIAL OFFICER	Y	NEW YORK, NY, United States

Registration and Employment History



Other Business Activities

This section includes information, if any, as provided by the broker regarding other business activities the broker is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious or fraternal and is recognized as tax exempt.

I AM THE OWNER OF THOMAS F. SULLIVAN CPA PLLC.

I PERFORM OUTSOURCED INVESTMENT-RELATED FINOP SERVICES, GENERAL ACCOUNTING AND OTHER FINANCIAL RELATED ACTIVITIES. I WILL OPERATE THIS BUSINESS FROM MY RESIDENCE EITHER DURING OR OUTSIDE OF TRADING HOURS. IT IS EXPECTED I WILL DEVOTE @10 HOURS/MONTH TO THIS ACTIVITY. THIS BUSINESS ENTITY WAS FORMED ON APRIL 27, 2015.

Disclosure Events



What you should know about reported disclosure events:

1. All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.
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 broker is required to disclose a particular criminal event.
 - A customer dispute must involve allegations that a broker engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.
 -
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, brokerage firms and regulators. When more than one of these sources reports information for the same disclosure event, all 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 brokers and brokerage 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.

For your convenience, below is a matrix of the number and status of disclosure events involving this broker. Further information regarding these events can be found in the subsequent pages of this report. You also may wish to contact the broker to obtain further information regarding these events.

	Pending	Final	On Appeal
Regulatory Event	0	1	0
Customer Dispute	0	1	N/A
Termination	N/A	1	N/A



Disclosure Event Details

When evaluating this information, please keep in mind that a disclosure event may be pending or involve allegations that are contested and have not been resolved or proven. The matter may, in the end, be withdrawn, dismissed, resolved in favor of the broker, or concluded through a negotiated settlement for certain business reasons (e.g., to maintain customer relationships or to limit the litigation costs associated with disputing the allegations) with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to CRD and therefore some of the specific data fields contained in the report may be blank if the information was not provided to CRD.

Regulatory - Final

This type of disclosure event may involve (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory such as the Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of a broker's authority to act as an attorney, accountant, or federal contractor.

Disclosure 1 of 1

Reporting Source: Regulator

Regulatory Action Initiated By: FINRA

Sanction(s) Sought:

Date Initiated: 10/31/2019

Docket/Case Number: 2016047616401

Employing firm when activity occurred which led to the regulatory action: Alexander Capital, L.P.

Product Type: No Product

Allegations: Without admitting or denying the findings, Sullivan consented to the sanctions and to the entry of findings that he, as his member firm's FINOP, permitted his member firm to continue its securities business when it was below its net capital requirement. The findings stated that Sullivan was responsible for, among other things, calculating its net capital and maintaining the accuracy of its general ledger, trial balance, and balance sheet. First, in 2016, the firm, acting through Sullivan, failed to recognize that its minimum net capital requirement increased from the minimum requirement of \$5,000 to \$50,000. Second, the firm, acting through Sullivan, included different types of non-allowable receivables in the firm's capital computations. These receivables were referral fees from an affiliated fund, receivables from the over-payment of rent to the firm's parent company and a



trade error receivable which was booked as allowable based on a representation that the registered representative was going to reimburse the firm. Each of these receivables is non-allowable for net capital purposes because they are unsecured, non-guaranteed receivables with no offsetting payables. Sullivan misclassified these receivables in part because he failed to take reasonable steps to understand the nature of these receivables. In 2017, the firm was below its minimum net capital requirement of \$5,000 by amounts ranging from approximately \$7,000 to approximately \$25,000. These net capital deficiencies were due to the failure of the firm, acting through Sullivan, to correctly classify certain receivables as non-allowable, including referral fees from an affiliated fund and other investment banking fees the firm had not yet received. Between June 29, 2018 and July 6, 2018, the firm conducted a securities business while failing to maintain its minimum net capital requirement of \$5,000. The deficiency was due to the failure of the firm, acting through Sullivan, to properly record a liability arising from an SEC administrative proceeding that the firm did not pay until July 2018. The findings also stated that Sullivan caused his firm's books and records to be inaccurate. Sullivan was responsible for the accuracy of the firm's FOCUS reports. In 2016, the firm failed to prepare accurate net capital computations and submitted inaccurate FOCUS reports, due to its misclassification of certain receivables and failure to use the correct minimum required net capital. In 2017, the firm submitted inaccurate FOCUS reports and failed to prepare accurate net capital computations. These recordkeeping failures stemmed the firm's failure to correctly classify certain investment banking receivables as non-allowable. The firm submitted an inaccurate FOCUS filing in 2018. The firm maintained an inaccurate general ledger and failed to prepare accurate net capital computations, due to its failure to properly record a liability arising from the SEC administrative proceeding.

Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	10/31/2019
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Requalification Suspension



If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?

No

(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?

(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or



(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Sanction 1 of 1

Sanction Type:	Suspension
Capacities Affected:	Any Financial and Operations Principal Capacity
Duration:	one month
Start Date:	11/18/2019
End Date:	12/17/2019

Requalification 1 of 1

Requalification Type:	Requalification by Exam
Length of time given to requalify:	N/A

Type of exam required :	FINOP
--------------------------------	-------

Has condition been satisfied:	No
--------------------------------------	----

Monetary Sanction 1 of 1

Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$5,000.00
Portion Levied against individual:	\$5,000.00

**Payment Plan:****Is Payment Plan Current:**

Date Paid by individual: 11/22/2019

Was any portion of penalty waived? No

Amount Waived:

Regulator Statement Fines paid in full on November 22, 2019.

Reporting Source: Broker

Regulatory Action Initiated By: FINRA

Sanction(s) Sought: Civil and Administrative Penalty(ies)/Fine(s)
Requalification
Suspension

Date Initiated: 10/31/2019

Docket/Case Number: 2016047616401

Employing firm when activity occurred which led to the regulatory action: Alexander Capital LP

Product Type: No Product

Allegations: Mr. Sullivan agreed to a settlement concerning bet capital and books & records violations as well as a materiel change in business operations.

Current Status: Final

Resolution: Acceptance, Waiver & Consent(AWC)

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Resolution Date: 10/31/2019

Sanctions Ordered: Civil and Administrative Penalty(ies)/Fine(s)
Requalification



Suspension

Sanction 1 of 1
Sanction Type: Suspension

Capacities Affected: FINOP

Duration: One month

Start Date: 11/18/2019

End Date: 12/17/2019

Requalification 1 of 1
Requalification Type: Requalification by Exam

Length of time given to requalify: N/A

Type of exam required : Series 27

Has condition been satisfied: No

Monetary Sanction 1 of 1
Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$5,000.00

Portion Levied against individual: \$5,000.00

Payment Plan: Payment terms are pending subject to regulator and applicant agreement

Is Payment Plan Current:
Date Paid by individual:
Was any portion of penalty waived? No

Amount Waived:



Customer Dispute - Settled

This type of disclosure event involves a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit containing allegations of sale practice violations against the broker that resulted in a monetary settlement to the customer.

Disclosure 1 of 1

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	ALEXANDER CAPITAL, L.P.
Allegations:	Failure to supervise. April 2012 through November 2016
Product Type:	Equity-OTC
Alleged Damages:	\$231,758.14

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	18-03984
Date Notice/Process Served:	11/28/2018
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	11/02/2020
Monetary Compensation Amount:	\$13,000.00
Individual Contribution Amount:	\$0.00

Broker Statement	The claims against Mr . Sullivan are factually inaccurate and there is no merit to the allegations. Mr. Sullivan was never a supervisor for any of the activity at issue, nor has he ever served as a supervisor for retail accounts in his role at Alexander Capital, LP. The claims against Mr. Sullivan are false and defamatory.
-------------------------	--



Employment Separation After Allegations

This type of disclosure event involves a situation where the broker voluntarily resigned, was discharged, or was permitted to resign after being accused of (1) violating investment-related statutes, regulations, rules or industry standards of conduct; (2) fraud or the wrongful taking of property; or (3) failure to supervise in connection with investment-related statutes, regulations, rules, or industry standards of conduct.

Disclosure 1 of 1

Reporting Source: Broker

Employer Name: MJ WHITMAN LLC

Termination Type: Voluntary Resignation

Termination Date: 05/25/2007

Allegations: ALLEGED VIOLATIONS OF NASD PROCEDURAL RULE 8210 AND CONDUCT RULE 2110

Product Type: Equity-OTC

Broker Statement IN MAY 2004, WHILE ASSOCIATED WITH TRADITION ASIEL SECURITIES INC. (CRD #28269), I MADE AN INADVERTENT ERROR IN HANDLING AND RESPONDING TO AN NASD MARKET REGULATION INQUIRY.

DESPITE MY EXPLAINING UNDER OATH TO THE DEPARTMENT OF MARKET REGULATION THAT I MADE AN ACCIDENTAL MISTAKE IN HANDLING THE INQUIRY, IN DECEMBER OF 2006, WHILE ASSOCIATED WITH MJ WHITMAN LLC (CRD #122481), I BECAME SUBJECT TO AN NASD INVESTIGATION.

I VOLUNTARILY RESIGNED FROM MJ WHITMAN LLC IN MAY 2007.

IN SEPTEMBER 2008, THE STAFF OF FINRA'S DEPARTMENT OF MARKET REGULATION CLOSED THEIR INVESTIGATION, DETERMINED WHAT HAD OCCURRED WAS PURELY UNINTENTIONAL, ISSUED A VERBAL APOLOGY VIA MY ATTORNEY AND RECOMMENDED THAT NO DISCIPLINARY ACTION BE TAKEN AGAINST ME.

End of Report



This page is intentionally left blank.