

BrokerCheck Report

THOMAS JOHN LYKOS JR

CRD# 2017220

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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.



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.](http://www.finra.org)

Thank you for using FINRA BrokerCheck.

THOMAS J. LYKOS JR

CRD# 2017220

This broker is not currently registered.

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 not currently registered.

This broker has passed:

- 1 Principal/Supervisory Exam
- 2 General Industry/Product Exams
- 2 State Securities Law Exams

Registration History

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

- B SANDERS MORRIS HARRIS LLC**
CRD# 20580
HOUSTON, TX
02/2018 - 05/2019
- B COMMERCE STREET CAPITAL, LLC**
CRD# 143797
DALLAS, TX
12/2009 - 02/2018
- B RAUSCHER PIERCE REFSNES, INC.**
CRD# 6663
DALLAS, TX
08/1991 - 08/1995

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
Judgment/Lien	2

Investment Adviser Representative Information

The information below represents the individual's record as a broker. For details on this individual's record as an investment adviser representative, visit the SEC's Investment Adviser Public Disclosure website at

<https://www.adviserinfo.sec.gov>

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 broker is not currently registered.



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.

This individual has passed 1 principal/supervisory exam, 2 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
B General Securities Principal Examination	Series 24	07/20/2018

General Industry/Product Exams

Exam	Category	Date
B Securities Industry Essentials Examination	SIE	10/01/2018
B General Securities Representative Examination	Series 7	12/01/2009

State Securities Law Exams

Exam	Category	Date
B IA Uniform Combined State Law Examination	Series 66	01/07/2011
B Uniform Securities Agent State Law Examination	Series 63	01/18/1991

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 02/2018 - 05/2019	SANDERS MORRIS HARRIS LLC	20580	HOUSTON, TX
B 12/2009 - 02/2018	COMMERCE STREET CAPITAL, LLC	143797	DALLAS, TX
B 08/1991 - 08/1995	RAUSCHER PIERCE REFSNES, INC.	6663	DALLAS, TX

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
02/2018 - Present	Sanders Morris Harris, LLC	Chief Compliance Officer	Y	Houston, TX, United States
12/2008 - 02/2018	COMMERCE STREET CAPITAL LLC	ATTORNEY-GENERAL COUNSEL	Y	DALLAS, TX, United States

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.

No information reported.



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:**
 - o A law enforcement agency must file formal charges before a broker is required to disclose a particular criminal event.
 - o 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.
 - o
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - o 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.
 - o
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 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	0	1
Judgment/Lien	2	N/A	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 - On Appeal

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

Disclosure 1 of 1

Reporting Source:	Regulator
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	Other: n/a
Date Initiated:	09/17/2019
Docket/Case Number:	2018059510201
Employing firm when activity occurred which led to the regulatory action:	Sanders Morris Harris, LLC
Product Type:	No Product
Allegations:	Lykos was named a respondent in a FINRA complaint alleging that he engaged in unethical conduct while taking the Series 24 qualification examination for a third time. The complaint alleges that during the exam, Lykos wrote on his hand and driver's license while viewing examination questions. Lykos then took a nearly 30-minute unscheduled break, during which he left the testing center premises in violation of FINRA's rules of conduct. After the break, Lykos attempted to bring a business card with handwritten notes on it into the examination testing room, but was thwarted by a testing center employee. Lykos then returned to the testing room and revisited several of the questions that he had been viewing while writing on his hand and driver's license. Lykos changed his answers to two questions. Lykos engaged in such conduct after acknowledging and agreeing to follow



FINRA's rules of conduct applicable to qualification examinations, which, among other things, prohibit leaving the testing center during any breaks, prohibit the removal of any test center material through any means, prohibit the capturing of examination content, and prohibit seeking assistance in answering examination questions.

Current Status: On Appeal

Action Appealed To: SRO

Date Appeal filed: 05/20/2020

Appeal Limitation Details:

Resolution: Pending appeal

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: 05/01/2020

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?

Regulator Statement

Hearing Panel decision rendered May 1, 2020 wherein respondent is barred from association with any FINRA member in all capacities and is ordered to pay costs in the amount of \$5,110.44. The sanction is based on findings that Lykos acted unethically by cheating during a qualification examination. The findings stated that at various points in the morning during the exam, Lykos wrote on his driver's license and on the fingers of his left hand, including the sides of his fingers. Subsequently, Lykos took an unscheduled break and, instead of using the restroom, he left the test center premises in violation of FINRA's Rules of Conduct. When Lykos returned to the exam after his unscheduled break, he answered one new question and then reviewed 17 questions he had already answered and



changed his answers to two questions. In addition, Lykos tried to conceal his misconduct from the exam proctors by licking and rubbing his driver's license and by obstructing their investigation by licking and smearing his fingers so that his writing could not be photographed clearly.

On May 20, 2020, Lykos appealed the decision to the National Adjudicatory Council. The sanction(s) are not in effect pending the review.



Judgment / Lien

This type of disclosure event involves an unsatisfied and outstanding judgments or liens against the broker.

Disclosure 1 of 2

Reporting Source:	Broker
Judgment/Lien Holder:	BUCKEYE RETIREMENT CO. LLC LTD.
Judgment/Lien Amount:	\$4,625,243.00
Judgment/Lien Type:	Civil
Date Filed with Court:	01/22/2004
Date Individual Learned:	01/22/2004
Type of Court:	DISTRICT COURT
Name of Court:	68TH JUDICIAL DISTRICT COURT
Location of Court:	HARRIS COUNTY, TEXAS
Docket/Case #:	04-00482-C
Judgment/Lien Outstanding?	Yes
Broker Statement	HARRIS COUNTY CASE #56-2007-00286120-CU WAS A RERECORDING OF THE JUDGMENT OBTAINED IN STATE COURT IN DALLAS COUNTY. THE CASE HAS SINCE BEEN CLOSED. THE LIEN HOLDER HAS LET THIS LAPSE AFTER 10 YEARS. BASED ON TEXAS LAW THE JUDGMENT IS ONLY VALID FOR TEN YEARS.

Disclosure 2 of 2

Reporting Source:	Broker
Judgment/Lien Holder:	MIDFIRST BANK
Judgment/Lien Amount:	\$2,579,000.00
Judgment/Lien Type:	Civil
Date Filed with Court:	03/06/2006
Type of Court:	Federal Court
Name of Court:	FEDERAL DISTRICT COURT
Location of Court:	NORTHER DISTRICT, TEXAS
Docket/Case #:	CASE NO. 3:03-CV-2449-K



Judgment/Lien Outstanding? Yes

Broker Statement

THE LENDER AGREED TO A JUDGMENT RELATED TO A CONSTRUCTION LOAN UPON WHICH I WAS A CO-GUARANTOR TO A THIRD PARTY OWNED BY THE PARTNERSHIP. JUDGMENT RESULTED FROM MY THIRD PARTY CO-GUARANTY ON A CONSTRUCTION LOAN. I AGREED TO A JUDGMENT WITH THE UNDERSTANDING THAT THE CO-GUARANTOR WOULD RESOLVE THE OUTSTANDING JUDGMENT. I WAS NOT IN CONTROL OR ASSOCIATED WITH THE PARTNERSHIP AT THE TIME THE PARTNERSHIP DEFAULTED. THE LENDER WAS AWARE THAT I WAS NOT IN A FINANCIAL POSITION TO GUARANTY ANY PART OF THIS LOAN AND LOOKED TO THE CO-GUARANTOR'S FINANCIAL STATEMENT AND THE VIABILITY OF THE PROJECT OWNED BY THE PARTNERSHIP FOR REPAYMENT. OFFERS TO SETTLE HAVE BEEN REJECTED. THE LIEN HOLDER IS LIKELY TO LET THIS LAPSE AFTER 10 YEARS.

End of Report



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