

BrokerCheck Report
JENNA A BROWN
 CRD# 5361782

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Broker Qualifications	2 - 3
Registration and Employment History	5 - 6
Disclosure Events	7



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.

JENNA A. BROWN

CRD# 5361782

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:

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

Registration History

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

- B LIFEMARK SECURITIES CORP.**
CRD# 16204
Syracuse, NY
04/2018 - 09/2022
- B CADARET, GRANT & CO., INC.**
CRD# 10641
LIVERPOOL, NY
08/2017 - 02/2018
- B MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED**
CRD# 7691
SYRACUSE, NY
10/2014 - 08/2017

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
Termination	1

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. 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 0 principal/supervisory exams, 2 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
No information reported.		

General Industry/Product Exams

Exam	Category	Date
B Securities Industry Essentials Examination	SIE	10/01/2018
B General Securities Representative Examination	Series 7	05/07/2012

State Securities Law Exams

Exam	Category	Date
IA Uniform Investment Adviser Law Examination	Series 65	07/15/2023
B IA Uniform Combined State Law Examination	Series 66	06/30/2012

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 04/2018 - 09/2022	LIFEMARK SECURITIES CORP.	16204	Syracuse, NY
B 08/2017 - 02/2018	CADARET, GRANT & CO., INC.	10641	LIVERPOOL, NY
B 10/2014 - 08/2017	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	7691	SYRACUSE, NY
B 10/2012 - 09/2014	LPL FINANCIAL LLC	6413	DEWITT, NY
B 05/2012 - 09/2012	AXA ADVISORS, LLC	6627	SYRACUSE, 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
01/2023 - Present	EMPIRIKAL PARTNERS LLC	INVESTMENT ADVISOR REPRESENTATIVE	Y	PHOENIX, AZ, United States
10/2022 - Present	EMPIRIKAL PARTNERS LLC	ADMINISTRATIVE ASSISTANT	Y	PHOENIX, AZ, United States
04/2017 - Present	SOLE PROPRIETOR	INDEPENDENT INSURANCE AGENT	Y	SYRACUSE, NY, United States
04/2018 - 09/2022	LIFEMARK SECURITIES CORP.	REGISTERED REPRESENTATIVE, INVESTMENT ADVISOR REPRESENTATIVE	Y	Rochester, NY, United States
08/2017 - 02/2018	Cadaret, Grant & Co., Inc.	REGISTERED REPRESENTATIVE/INVESTMENT ADVISOR REPRESENTATIVE	Y	Liverpool, NY, United States



Registration and Employment History

Employment History, continued

Employment	Employer Name	Position	Investment Related	Employer Location
02/2015 - 08/2017	BANK OF AMERICA, N.A.	FINANCIAL ADVISOR TRAINEE	Y	SYRACUSE, NY, United States
10/2014 - 08/2017	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	REGISTERED REPRESENTATIVE/INVESTMENT ADVISOR REPRESENTATIVE	Y	SYRACUSE, NY, 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.

INDEPENDENT INSURANCE AGENT / INVESTMENT RELATED / 4787 SETTING SUN TERRACE, SYRACUSE, NY 13215 / START 04/2017 / 15 HOURS/MONTH / 5 HOURS/MONTH DURING SECURITIES TRADING HOURS / SALES AND SERVICE OF LIFE, ACCIDENT AND HEALTH INSURANCE.

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.
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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.
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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
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: 01/24/2019

Docket/Case Number: [2018057513901](#)

Employing firm when activity occurred which led to the regulatory action: Cadaret, Grant & Co., Inc.

Product Type: Other: investment advisory agreements

Allegations: Without admitting or denying the findings, Brown consented to the sanctions and to the entry of findings that she forged signatures on investment advisory agreements. The findings stated that Brown's member firm added her as a joint representative on the customers' brokerage accounts, with the approval of both the other registered representative and the customers. However, in order to add Brown as an advisor on the customers' investment advisory accounts, the firm required that a new investment advisory agreement be executed for each account, with original signatures from Brown, the other registered representative, and the customer. Although the other representatives and the customers in question approved of adding Brown as an advisor on their investment advisory accounts, Brown did not obtain the necessary signatures on some of the investment advisory



agreements. Instead, she forged the signatures of customers who lived out of state, without the customers' knowledge or approval, in order to avoid mailing the agreements to the customers for their signature. Brown also forged the other registered representative's signature on investment advisory agreements, without his knowledge or approval, in order to avoid the inconvenience of driving to his office to obtain his genuine signature. The firm's Advisory Services Department determined that the investment advisory agreements in question submitted by Brown contained forged signatures and, as a result, it did not approve or process the investment advisory agreements.

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:	01/24/2019
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) 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:	All Capacities
Duration:	three months
Start Date:	02/19/2019
End Date:	05/18/2019

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:	10/17/2019
Was any portion of penalty waived?	No

Amount Waived:

Regulator Statement	Fines paid in full on October 17, 2019.
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Reporting Source:	Broker
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	
Date Initiated:	01/24/2019
Docket/Case Number:	2018057513901
Employing firm when activity occurred which led to the regulatory action:	Caderet, Grant & Co., Inc.
Product Type:	Other: Investment Advisory Agreements
Allegations:	<p>Without admitting or denying the findings, Brown consented to the sanctions and to the entry of findings that she signed as the client on internal investment advisory agreements. The findings stated that Brown's member firm added her as a joint representative on the customers' brokerage accounts, with the approval of both the other registered representative and the customers. However, in order to add Brown as an advisor on the customers' investment advisory accounts, the firm required that a new investment advisory agreement be executed for each account, with original signatures from Brown, the other registered representative, and the customer. Although the other representatives and the customers in question approved of adding Brown as an advisor on their investment advisory accounts, Brown did not obtain the necessary signatures on some of the investment advisory agreements. Instead, she signed the signatures of customers who lived out of state, without the customers' knowledge or approval, in order to avoid mailing the agreements to the customers for their signature. Brown also signed the signature of the other registered representative on the same investment advisory agreements, without his knowledge or approval, in order to avoid the inconvenience of driving to his office to obtain his genuine signature. The firm's Advisory Services Department determined that the investment advisory agreements in question submitted by Brown contained forged signatures and, as a result, it did not approve or process the investment advisory agreements.</p>
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:	01/24/2019
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	All Capacities
Duration:	3 months
Start Date:	02/19/2019
End Date:	05/19/2019
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:	
Was any portion of penalty waived?	No
Amount Waived:	
Broker Statement	The documents in question were internal administrative Cadaret Grant forms that related solely to the division of income between myself and my business partner. When my partner and I transferred our practice from Merrill Lynch to Cadaret Grant in August 2017, for business reasons we placed all of our clients under his individual production code used for tracking income. In January 2018 my partner and I decided to transfer the clients to a joint production code to reflect that we shared the income we earned from serving our clients. To effectuate that transfer, our clients needed to sign a form. In most cases, I was able to obtain the clients'



signatures. However, I could not reach a few clients to obtain their signatures either because they were traveling or were otherwise difficult to contact. In those few instances I signed the clients' signatures on the paperwork reassigning them to the joint production code. While this was done purely as a convenience for the clients involved and I greatly regret my mistake, the forms I signed on their behalf related to a purely internal administrative issue at Cadaret Grant, since it concerned how my partner and I agreed to share the income we earned by serving our clients. The paperwork did not relate to the clients' investments, trading activity, or any sales practice matters and did not create a compliance risk for my firm.



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: Firm

Employer Name: Cadaret, Grant & Co., Inc.

Termination Type: Discharged

Termination Date: 02/15/2018

Allegations: Brown self executed client signatures to investment advisory agreements in place of obtaining their signature in violation of the firm's policy and procedures and FINRA Rule 2010. No customers were harmed as the investment advisory agreements were never processed.

Product Type: Other: Investment advisory agreements

Reporting Source: Broker

Employer Name: Cadaret, Grant & Co., Inc.

Termination Type: Discharged

Termination Date: 02/15/2018

Allegations: Rep self executed client signatures to investment advisory agreements in place of obtaining their signature in violation of the firm's policy and procedures and FINRA Rule 2010. No customers were harmed as the investment advisory agreements were never processed.

Product Type: Other: investment advisory agreements

Broker Statement The documents in question were internal administrative Cadaret Grant forms that related solely to the division of income between myself and my business partner. When my partner and I transferred our practice from Merrill Lynch to Cadaret Grant in August 2017, for business reasons we placed all of our clients under his individual production code used for tracking income. In January 2018 my partner and I decided to transfer the clients to a joint production code to reflect that we shared the income we earned from serving our clients. To effectuate that transfer, our clients needed to sign a form. In most cases, I was able to obtain the clients' signatures. However, I could not reach a few clients to obtain their signatures either because they were traveling or were otherwise difficult to contact. In those few instances I signed the clients' signatures on the paperwork reassigning them to the joint production code. While this was done purely as a



convenience for the clients involved and I greatly regret my mistake, the forms I signed on their behalf related to a purely internal administrative issue at Cadaret Grant, since it concerned how my partner and I agreed to share the income we earned by serving our clients. The paperwork did not relate to the clients' investments, trading activity, or any sales practice matters and did not create a compliance risk for my firm.

End of Report



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