

BrokerCheck Report

GLOBAL HUNTER SECURITIES, LLC

CRD# 123003

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Registration and Withdrawal	2
Firm Profile	3 - 10
Firm History	11
Firm Operations	12 - 18
Disclosure Events	19



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



GLOBAL HUNTER SECURITIES, LLC

CRD# 123003

SEC# 8-65552

Main Office Location

400 POYDRAS STREET
SUITE 3100
NEW ORLEANS, LA 70130

Mailing Address

400 POYDRAS STREET
SUITE 3100
NEW ORLEANS, LA 70130

Business Telephone Number

504-410-8010

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 New York on 11/14/2001.
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 brokerage firm is no longer registered with FINRA or a national securities exchange.

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	3

Registration Withdrawal Information

This section provides information relating to the date the brokerage firm ceased doing business and the firm's financial obligations to customers or other brokerage firms.



Date firm ceased business: 12/31/2014

Does this brokerage firm owe any money or securities to any customer or brokerage firm? No



Firm Profile

This firm is classified as a limited liability company.
This firm was formed in New York on 11/14/2001.
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.

GLOBAL HUNTER SECURITIES, LLC
Doing business as GLOBAL HUNTER SECURITIES, LLC
CRD# 123003
SEC# 8-65552

Main Office Location
400 POYDRAS STREET
SUITE 3100
NEW ORLEANS, LA 70130

Mailing Address
400 POYDRAS STREET
SUITE 3100
NEW ORLEANS, LA 70130

Business Telephone Number
504-410-8010

Other Names of this Firm

Name	Where is it used
SEAPORT GLOBAL HOLDINGS	AK, AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, HI, IA, ID, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, RI, SC, SD, TX, UT, VA, VT, WA, WI, WV, WY

THE SEAPORT GROUP

AK, AL, AR, AZ, CA,
CO, CT, DC, DE, FL,
GA, HI, IA, ID, IL, IN,
KS, KY, LA, MA, MD,
ME, MI, MN, MO,
MS, MT, NC, ND, NE,
NH, NJ, NM, NV, NY,
OH, OK, OR, PA, RI,
SC, SD, TX, UT, VA,
VT, WA, WI, WV, WY



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): SEAPORT GLOBAL HOLDINGS, LLC

Is this a domestic or foreign entity or an individual? Domestic Entity

Position PARENT COMPANY

Position Start Date 01/2014

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): CONWILL, DANIEL OZA IV
1714135

Is this a domestic or foreign entity or an individual? Individual

Position CHAIRMAN, CEO

Position Start Date 08/2005

Percentage of Ownership Less than 5%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): JOHNSON, MARY SAUNDERS
5680544

Is this a domestic or foreign entity or an individual? Individual

Position CFO

Position Start Date 02/2010

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? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): LAINFIESTA, EDWARD ROBERT
1139496

Is this a domestic or foreign entity or an individual? Individual

Position PRESIDENT

Position Start Date 05/2007

Percentage of Ownership Less than 5%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): MERINGER, GARY E
2179687

Is this a domestic or foreign entity or an individual? Individual

Position GENERAL COUNSEL, COO

Position Start Date 03/2010

Percentage of Ownership Less than 5%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): ZACK, DAVID

Firm Profile



Direct Owners and Executive Officers (continued)

	2356042
Is this a domestic or foreign entity or an individual?	Individual
Position	CCO
Position Start Date	06/2012
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):	CONWILL, DANIEL OZA IV 1714135
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	SEAPORT GLOBAL HOLDINGS, LLC
Relationship to Direct Owner	ELECTED MANAGER
Relationship Established	01/2014
Percentage of Ownership	Other General Partners
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	LAINFIESTA, EDWARD ROBERT 1139496
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	SEAPORT GLOBAL HOLDINGS, LLC
Relationship to Direct Owner	ELECTED MANAGER
Relationship Established	01/2014
Percentage of Ownership	Other General Partners
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	MEAGHER, MICHAEL JEFFERSON
--	----------------------------

Firm Profile



Indirect Owners (continued)

1755168

Is this a domestic or foreign entity or an individual? Individual

Company through which indirect ownership is established SEAPORT GLOBAL HOLDINGS, LLC

Relationship to Direct Owner ELECTED MANAGER

Relationship Established 01/2014

Percentage of Ownership Other General Partners

Does this owner direct the management or policies of the firm? No

Is this a public reporting company? No

Legal Name & CRD# (if any): MEYER, MICHAEL JOHN
1746788

Is this a domestic or foreign entity or an individual? Individual

Company through which indirect ownership is established SEAPORT GLOBAL HOLDINGS, LLC

Relationship to Direct Owner ELECTED MANAGER

Relationship Established 01/2014

Percentage of Ownership Other General Partners

Does this owner direct the management or policies of the firm? No

Is this a public reporting company? No

Legal Name & CRD# (if any): SMITH, STEPHEN CORCORAN
1248750

Is this a domestic or foreign entity or an individual? Individual

Firm Profile



Indirect Owners (continued)

Company through which indirect ownership is established	SEAPORT GLOBAL HOLDINGS, LLC
Relationship to Direct Owner	ELECTED MANAGER
Relationship Established	01/2014
Percentage of Ownership	Other General Partners
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Firm History

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

No information reported.



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 no longer registered.

The firm's registration was from 03/13/2003 to 07/06/2015.





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 9 types of businesses.

Types of Business

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

Underwriter or selling group participant (corporate securities other than mutual funds)

Broker or dealer selling tax shelters or limited partnerships in primary distributions

Broker or dealer selling tax shelters or limited partnerships in the secondary market

Non-exchange member arranging for transactions in listed securities by exchange member

Private placements of securities

Other - CONDUCTS THE BUSINESS OF TRANSACTION SERVICES IN CONNECTION WITH MERGERS, ACQUISITIONS, AND DIVESTITURES. BUSINESS CONSULTING DEVELOPMENT. PROVIDES RESEARCH TO INSTITUTIONAL INVESTORS.

Other Types of Business

This firm does not effect transactions in commodities, commodity futures, or commodity options.

This firm does not engage in other non-securities business.

Non-Securities Business Description:

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 refer or introduce customers to other brokers and dealers.

Name:	GOLDMAN SACHS EXECUTION & CLEARING, L.P.
CRD #:	3466
Business Address:	200 WEST STREET NEW YORK, NY 10282
Effective Date:	12/17/2012
Description:	GLOBAL HUNTER SECURITIES, LLC INTRODUCES CUSTOMER ACCOUNTS TO GOLDMAN SACHS EXECUTION & CLEARING, L.P. ON A FULLY-DISCLOSED BASIS.

Firm Operations

Industry Arrangements



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

Name: GOLDMAN SACHS EXECUTION & CLEARING, L.P.

CRD #: 3466

Business Address: 200 WEST STREET
NEW YORK, NY 10282

Effective Date: 12/17/2012

Description: GLOBAL HUNTER SECURITIES, LLC INTRODUCES CUSTOMER ACCOUNTS TO GOLDMAN SACHS EXECUTION & CLEARING, L.P. ("GSEC") ON A FULLY-DISCLOSED BASIS. AS PART OF THE ARRANGEMENT, ACCOUNTS, FUNDS, OR SECURITIES OF CUSTOMERS OF GLOBAL HUNTER SECURITIES, LLC ARE HELD OR MAINTAINED BY GSEC.

This firm does have accounts, funds, or securities maintained by a third party.

Name: GOLDMAN SACHS EXECUTION & CLEARING, L.P.

CRD #: 3466

Business Address: 200 WEST STREET
NEW YORK, NJ 10282

Effective Date: 12/17/2012

Description: GLOBAL HUNTER SECURITIES, LLC INTRODUCES CUSTOMER ACCOUNTS TO GOLDMAN SACHS EXECUTION & CLEARING, L.P. ("GSEC") ON A FULLY-DISCLOSED BASIS. AS PART OF THE ARRANGEMENT, ACCOUNTS, FUNDS, OR SECURITIES OF CUSTOMERS OF GLOBAL HUNTER SECURITIES, LLC ARE HELD OR MAINTAINED BY GSEC.

This firm does have customer accounts, funds, or securities maintained by a third party.

Name: GOLDMAN SACHS EXECUTION & CLEARING, L.P.

CRD #: 3466

Business Address: 200 WEST STREET
NEW YORK, NY 10282

Effective Date: 12/17/2012

Description: GLOBAL HUNTER SECURITIES, LLC INTRODUCES CUSTOMER ACCOUNTS TO GOLDMAN SACHS EXECUTION & CLEARING, L.P. ("GSEC") ON A FULLY-DISCLOSED BASIS. AS PART OF THE

Firm Operations



Industry Arrangements (continued)

ARRANGEMENT, ACCOUNTS, FUNDS, OR SECURITIES OF CUSTOMERS OF GLOBAL HUNTER SECURITIES, LLC ARE HELD OR MAINTAINED BY GSEC.

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.**

SEA PORT GROUP SECURITIES, LLC is under common control with the firm.

CRD #:	116270
Business Address:	360 MADISON AVENUE, 22ND FLOOR NEW YORK, NY 10017
Effective Date:	01/01/2014
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	BOTH GLOBAL HUNTER SECURITIES, LLC AND THE SEA PORT GROUP SECURITIES, LLC ARE UNDER COMMON OWNERSHIP BY SEAPORT GLOBAL HOLDINGS, LLC.

GHS TRADING LLC is under common control with the firm.

CRD #:	158195
Business Address:	600 ANTON BOULEVARD SUITE 1700 COSTA MESA, CA 92626
Effective Date:	06/15/2011
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No

Firm Operations



Organization Affiliates (continued)

Description: GLOBAL HUNTER SECURITIES, LLC IS WHOLLY OWNED BY SEAPORT GLOBAL HOLDINGS, LLC. SEAPORT GLOBAL HOLDINGS, LLC OWNS 49% OF GHS TRADING, 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	3	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 3

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 ESTABLISH ANTI-MONEY LAUNDERING (AML) PROCEDURES REASONABLY DESIGNED TO DETECT, INVESTIGATE, AND REPORT, AS APPLICABLE, SUSPICIOUS ACTIVITY INVOLVING RECEIPTS AND SALES OF PENNY-STOCK SECURITIES. THE FINDINGS STATED THAT THE FIRM'S PROCEDURES DID NOT ADEQUATELY ADDRESS HOW FIRM PERSONNEL SHOULD CONDUCT ACCOUNT MONITORING OR WHAT THE INVESTIGATION OF ANY RED FLAG ACTIVITY SHOULD ENTAIL. THE FIRM'S AML PROCEDURES DID NOT ADEQUATELY ADDRESS ISSUES RELATING TO THE RECEIPT AND SALE OF PENNY-STOCK SECURITIES, INCLUDING WHAT DUE DILIGENCE SHOULD BE CONDUCTED BEFORE PERMITTING CUSTOMERS TO SELL SUCH SECURITIES. AS A RESULT OF THESE DEFICIENCIES, FIRM PERSONNEL DID NOT ADEQUATELY INVESTIGATE THE CIRCUMSTANCES OF THE ACQUISITIONS BY CLIENTS OF THE VARIOUS PENNY-STOCK SHARES THEY DEPOSITED AND SOLD IN THEIR ACCOUNTS AT THE FIRM. THE FINDINGS ALSO STATED THAT THE FIRM ISSUED APPROXIMATELY 2,000 EQUITY REPORTS. CERTAIN DISCLOSURES APPEARED IN MANY OF THE RESEARCH REPORTS, REGARDLESS OF WHETHER A DISCLOSURE EVENT/FACT, WITHIN THE SCOPE OF SUBPART (H)(1)(A) OR SUBPARTS (H)(2)(A)(II)(A-C) OF NASD RULE 2711, ACTUALLY EXISTED. SUCH DISCLOSURES ARE CONDITIONAL AND INDEFINITE IN NATURE.

Initiated By: FINRA

Date Initiated: 03/28/2014

Docket/Case Number: [2012030381501](#)

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: 03/28/2014

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 \$35,000.00

Other Sanctions Ordered:

Sanction Details: SEE ABOVE

Reporting Source: Firm

Current Status: Final

Allegations: (1) INADEQUATE ANTI-MONEY LAUNDERING PROCEDURES WHICH DID NOT PROPERLY ADDRESS HOW FIRM PERSONNEL SHOULD CONDUCT ACCOUNT MONITORING OR HOW TO INVESTIGATE "RED FLAG" ACTIVITY IN THE SALE OF PENNY-STOCKS IN VIOLATION OF FINRA RULES 3310(A) AND 2010, AND (2) THE ISSUANCE OF EQUITY RESEARCH REPORTS WITH CONDITIONAL AND INDEFINITE DISCLOSURES IN VIOLATION OF RULES 2711(H)(10) AND 2010.

Initiated By: FINANCIAL INDUSTRY REGULATORY AUTHORITY

Date Initiated: 06/26/2013

Docket/Case Number: MATTER NO. 2012030381501

Principal Product Type: Penny Stock(s)

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: 03/28/2014

Sanctions Ordered: Censure
Monetary/Fine \$35,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS FINED \$35,000.

Firm Statement THE ABOVE DEFICIENCIES HAVE BEEN FULLY REMEDIATED.

Disclosure 2 of 3

Reporting Source: Regulator

**Current Status:**

Final

Allegations:

FINRA RULE 2010, NASD RULES 1017(A), 2210(D)(1), SUBPARTS (A), (B), AND (D), 2711(D)(2), 2711(H), SUBPARTS (2), (7), AND (10), 3010, SUBPARAGRAPHS (A), (B), AND (D), 3010(B): THE FIRM FAILED TO ESTABLISH AND MAINTAIN AN ADEQUATE SYSTEM FOR THE SUPERVISION OF WRITTEN COMMUNICATIONS OF ASSOCIATED PERSONS CONDUCTED IN A FOREIGN LANGUAGE, BECAUSE IT LACKED SUPERVISORY PERSONNEL WITH FLUENCY IN THAT LANGUAGE WHEN CERTAIN ASPECTS OF THE FIRM'S RESEARCH AND INVESTMENT BANKING BUSINESSES INVOLVED WRITTEN COMMUNICATIONS IN THAT FOREIGN LANGUAGE, AS A RESULT THE FIRM LACKED THE ABILITY TO EFFECTIVELY MONITOR THOSE COMMUNICATIONS. THE FIRM FAILED TO ESTABLISH AND MAINTAIN AN ADEQUATE SYSTEM FOR THE MONITORING OF EMPLOYEE TRADING ACTIVITY IN ACCOUNTS HELD AT OTHER FINRA MEMBER FIRMS. THE FIRM FAILED TO ENFORCE ITS OWN PROCEDURES REQUIRING THAT NEWLY-HIRED PERSONNEL DISCLOSE THEIR OUTSIDE BROKERAGE ACCOUNTS, AND THE FIRM FAILED TO ADEQUATELY MONITOR EMPLOYEE TRADING ACTIVITY IN SUCH ACCOUNTS. AS A RESULT OF THIS FAILURE, THE FIRM FAILED TO IDENTIFY IMPROPER TRADING ACTIVITY BY A MEMBER OF ITS RESEARCH DEPARTMENT IN AN ACCOUNT HELD AT ANOTHER FINRA MEMBER FIRM. THE FIRM DID NOT HAVE AN INFORMATION BARRIERS PROGRAM THAT WAS REASONABLY DESIGNED TO DETECT AND PREVENT THE MISUSE OF MATERIAL, NONPUBLIC INFORMATION BY EMPLOYEES. AS SET FORTH IN JOINT MEMO 91-45, THE NYSE AND NASD NKA FINRA JOINT MEMORANDUM, A FIRM'S PROCEDURES SHOULD EXPLAIN WHY, WHEN, THE NAME OF A CONTACT PERSON WHO CAN ANSWER SPECIFIC QUESTIONS, AND HOW A SECURITY IS ADDED OR DELETED ON THE WATCH/RESTRICTED LIST AND THE ACTIVITIES THAT ARE PROHIBITED OR RESTRICTED WHILE A SECURITY IS ON THE LIST. THE FIRM DID NOT ADEQUATELY MONITOR EMPLOYEE TRADING ACTIVITY IN ACCOUNTS HELD AT OTHER FINRA MEMBER FIRMS FOR TRANSACTIONS INVOLVING SECURITIES LISTED ON THE WATCH/RESTRICTED LIST. THE FIRM ISSUED EQUITY SECURITY RESEARCH REPORTS THAT FAILED TO COMPLY WITH THE DISCLOSURE REQUIREMENTS. THE FIRM FAILED TO COMPLY WITH THE RESTRICTIONS IMPOSED UNDER NASD RULE WITH RESPECT TO RELATIONSHIPS BETWEEN ITS INVESTMENT BANKING AND RESEARCH DEPARTMENTS. THE FIRM PERMITTED ITS CHIEF EXECUTIVE OFFICER TO SERVE ON THE RESEARCH ANALYST COMPENSATION COMMITTEE, DESPITE HIS SUBSTANTIAL INVOLVEMENT IN THE FIRM'S INVESTMENT BANKING BUSINESS. AT VARIOUS TIMES, THE FIRM DISSEMINATED TO PROSPECTIVE CUSTOMERS A PROMOTIONAL SLIDE PRESENTATION REGARDING PARTICULAR SERVICES OFFERED BY THE FIRM. THE PRESENTATION WAS NOT FAIR AND BALANCED AND LACKED REQUIRED RISK DISCLOSURES. IN ADDITION, THE PRESENTATION DID NOT PROVIDE



A SOUND BASIS FOR EVALUATING CERTAIN REPRESENTATIONS MADE IN THE PRESENTATION REGARDING THE SERVICES DISCUSSED. THE FIRM FAILED TO OBTAIN FINRA APPROVAL PRIOR TO EFFECTING A MATERIAL CHANGE IN ITS BUSINESS OPERATIONS. THE FIRM INCREASED ITS SALES PERSONNEL BY AN AMOUNT OF PERSONS IN EXCESS OF THE LIMITATIONS OF THE SAFE HARBOR PROVISIONS.

Initiated By:	FINRA
Date Initiated:	02/15/2013
Docket/Case Number:	2011025644101
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	N/A
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	02/15/2013
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 \$150,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE THE FIRM IS CENSURED AND FINED \$150,000. FINE PAID IN FULL 3/5/13.
<hr/>	
Reporting Source:	Firm
Current Status:	Final
Allegations:	FINRA RULE 2010, NASD RULE 1017(A), 2210(D)(1), SUBPARTS (A), (B), AND (D), 2711(D)(2), 2711(H), SUBPARTS (2), (7), AND (10), 3010, SUBPARAGRAPHS (A), (B), AND (D), 3010(B).



(1) FAILURE TO SUPERVISE ASSOCIATES IN A FOREIGN LANGUAGE, (2) FAILURE TO ESTABLISH ADEQUATE SYSTEMS TO MONITOR EMPLOYEE TRADES, (3) FAILURE TO ESTABLISH ADEQUATE INFORMATION BARRIERS, (4) FAILURE TO HAVE ADEQUATE RESEARCH DISCLOSURES, (5) FAILURE TO MAINTAIN ADEQUATE SEPARATION BETWEEN RESEARCH AND INVESTMENT BANKING, (6) DISSEMINATION OF A PRESENTATION LACKING REQUIRED RISK DISCLOSURES, (7) INCREASING ITS SALES FORCE BEYOND THE SAFE HARBOR PROVISIONS.

Initiated By: FINANCIAL INDUSTRY REGULATORY AUTHORITY

Date Initiated: 04/26/2012

Docket/Case Number: MATTER NO. 2011025644101

Principal Product Type: Other

Other Product Type(s): NONE.

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

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 02/15/2013

Sanctions Ordered: Censure
Monetary/Fine \$150,000.00

Other Sanctions Ordered: NONE.

Sanction Details: FINE OF \$150,000.

Firm Statement THE ACTION WAS SETTLED BY ENTERING INTO AN AWC ON 02/15/2013 RESULTING IN A CENSURE AND A FINE OF \$150,000 AGAINST REGISTRANT.

Disclosure 3 of 3

Reporting Source: Regulator

Current Status: Final

Allegations: FINRA RULE 7450 - GLOBAL HUNTER SECURITIES, LLC FAILED TO TRANSMIT NUMEROUS REPORTABLE ORDER EVENTS (ROES) TO THE ORDER AUDIT TRAIL SYSTEM (OATS); THESE ROES REPRESENTED MOST OF ALL ROES THAT THE FIRM WAS REQUIRED TO TRANSMIT TO OATS DURING THAT PERIOD.



Initiated By: FINRA

Date Initiated: 11/21/2011

Docket/Case Number: 2010024330901

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: 11/21/2011

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 \$8,500.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED AND FINED \$8,500. FINE PAID IN FULL DECEMBER 8, 2011.

Reporting Source: Firm

Current Status: Final

Allegations: FINRA ALLEGED THAT DURING THE PERIOD SEPTEMBER 1, 2009 THROUGH JULY 27, 2010, THE FIRM FAILED TO TRANSMIT CERTAIN REPORTABLE ORDER EVENTS TO OATS, WHICH CONSTITUTED VIOLATIONS OF FINRA RULE 7450.

Initiated By: FINANCIAL INDUSTRY REGULATORY AUTHORITY

Date Initiated: 09/06/2011

Docket/Case Number: MATTER NO. 20100243309



Principal Product Type:	Equity - OTC
Other Product Type(s):	OATS REPORTABLE SECURITIES
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	FINE OF \$8,500
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	11/21/2011
Sanctions Ordered:	Censure Monetary/Fine \$8,500.00
Other Sanctions Ordered:	
Sanction Details:	PAYMENT MADE ON 12/07/2011.

End of Report



This page is intentionally left blank.