

BrokerCheck Report

CG COMPASS (USA) LLC

CRD# 129837

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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.



CG COMPASS (USA) LLC

CRD# 129837

SEC# 8-66263

Main Office Location

590 MADISON AVE
33RD FLOOR
NEW YORK, NY 10022
Regulated by FINRA New York Office

Mailing Address

590 MADISON AVE
33RD FLOOR
NEW YORK, NY 10022

Business Telephone Number

212-355-7630

Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Delaware on 10/01/2003.

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 firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 18 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? **No**

This firm conducts 7 types of businesses.

This firm is affiliated with financial or investment institutions.

This firm has referral or financial arrangements with other brokers or dealers.

Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

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

The following types of disclosures have been reported:

Type	Count
Regulatory Event	1



Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Delaware on 10/01/2003.

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.

CG COMPASS (USA) LLC

Doing business as CG COMPASS (USA) LLC

CRD# 129837

SEC# 8-66263

Main Office Location

590 MADISON AVE
33RD FLOOR
NEW YORK, NY 10022

Regulated by FINRA New York Office

Mailing Address

590 MADISON AVE
33RD FLOOR
NEW YORK, NY 10022

Business Telephone Number

212-355-7630



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): COMPASS GROUP HOLDINGS INC.

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

Position OWNER

Position Start Date 03/2010

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): ALVAREZ, KAREN LOU
4044938

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

Position FINOP

Position Start Date 05/2006

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

Legal Name & CRD# (if any): ALVIZUA, PEDRO GERARDO
6441839

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

Position CHIEF COMPLIANCE OFFICER

Position Start Date 01/2018

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
<hr/>	
Legal Name & CRD# (if any):	ROJAS PROVENZALI, HECTOR ARTURO 6290965
Is this a domestic or foreign entity or an individual?	Individual
Position	CEO & EXECUTIVE REPRESENTATIVE
Position Start Date	01/2025
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
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Firm Profile

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

Indirect Owners

Legal Name & CRD# (if any):	COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD LIMITADA
Is this a domestic or foreign entity or an individual?	Foreign Entity
Company through which indirect ownership is established	COMPASS GROUP HOLDINGS INC.
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	03/2010
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):	MNC HOLDINGS LTD.
Is this a domestic or foreign entity or an individual?	Foreign Entity
Company through which indirect ownership is established	COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD LIMITADA
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	01/2020
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):	VINCI COMPASS INVESTMENTS LTD.
Is this a domestic or foreign entity or an individual?	Foreign Entity

Firm Profile



Indirect Owners (continued)

Company through which indirect ownership is established	MNC HOLDINGS LTD
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	10/2024
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	Yes

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 currently registered with the SEC, 1 SRO and 18 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	05/26/2004

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: Yes

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: No

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	05/26/2004



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
California	Approved	03/17/2014
Connecticut	Approved	02/04/2020
Delaware	Approved	04/29/2022
District of Columbia	Approved	11/18/2014
Florida	Approved	06/03/2004
Illinois	Approved	11/24/2014
Maryland	Approved	11/13/2014
Massachusetts	Approved	03/19/2014
Missouri	Approved	05/28/2019
New York	Approved	12/10/2003
Ohio	Approved	11/12/2014
Oregon	Approved	11/17/2014
Pennsylvania	Approved	12/03/2014
South Carolina	Approved	07/22/2021
Texas	Approved	04/24/2014
Utah	Approved	07/13/2023
Virginia	Approved	11/25/2014
Washington	Approved	11/10/2014

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 7 types of businesses.

Types of Business

Broker or dealer retailing corporate equity securities over-the-counter
Broker or dealer selling corporate debt securities
Mutual fund retailer
U S. government securities broker
Put and call broker or dealer or option writer
Non-exchange member arranging for transactions in listed securities by exchange member
Private placements of securities



Firm Operations

Clearing Arrangements

This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

Introducing Arrangements

This firm does refer or introduce customers to other brokers and dealers.

Name:	PERSHING LLC
CRD #:	7560
Business Address:	ONE PERSHING PLAZA JERSEY CITY, NJ 07399
Effective Date:	01/02/2014
Description:	MEMBER OPERATES UNDER A FULLY-DISCLOSED CLEARING AGREEMENT WITH PERSHING LLC. PURSUANT TO THE (K)(2)(II) EXEMPTIVE PROVISIONS OF THE SEC RULE 15C3-3 AND WILL NOT HOLD CUSTOMER FUNDS OR SECURITIES.

Firm Operations

Industry Arrangements



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

Name: PERSHING LLC
CRD #: 7560
Business Address: ONE PERSHING PLAZA
JERSEY CITY, NJ 07399
Effective Date: 01/02/2014
Description: MEMBER OPERATES UNDER A FULLY-DISCLOSED CLEARING AGREEMENT WITH PERSHING LLC. PURSUANT TO THE (K)(2)(II) EXEMPTIVE PROVISIONS OF THE SEC RULE 15C3-3 AND WILL NOT HOLD CUSTOMER FUNDS OR SECURITIES.

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

Name: PERSHING LLC
CRD #: 7560
Business Address: ONE PERSHING PLAZA
JERSEY CITY, NJ 07399
Effective Date: 01/02/2014
Description: MEMBER OPERATES UNDER A FULLY-DISCLOSED CLEARING AGREEMENT WITH PERSHING LLC. PURSUANT TO THE (K)(2)(II) EXEMPTIVE PROVISIONS OF THE SEC RULE 15C3-3 AND WILL NOT HOLD CUSTOMER FUNDS OR SECURITIES.

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

Name: PERSHING LLC
CRD #: 7560
Business Address: ONE PERSHING PLAZA
JERSEY CITY, NJ 07399
Effective Date: 01/02/2014
Description: MEMBER OPERATES UNDER A FULLY-DISCLOSED CLEARING AGREEMENT WITH PERSHING LLC. PURSUANT TO THE (K)(2)(II) EXEMPTIVE PROVISIONS OF THE SEC RULE 15C3-3 AND WILL NOT HOLD CUSTOMER FUNDS OR SECURITIES.

Control Persons/Financing

This firm does not have individuals who control its management or policies through agreement.

Firm Operations

Industry Arrangements (continued)



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.**

VINCI PARTNERS USA is under common control with the firm.

CRD #:	162399
Business Address:	590 MADISON AVENUE 33RD FLOOR NEW YORK, NY 10022
Effective Date:	10/29/2024
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	VINCI PARTNERS USA LLC IS INDIRECTLY WHOLLY OWNED BY VINCI COMPASS INVESTMENTS LTD., WHICH IS ALSO THE INDIRECT WHOLLY OWNER OF THE APPLICANT

COMPASS GROUP INVESTMENTS SOLUTIONS LLC is under common control with the firm.

CRD #:	305680
Business Address:	1441 BRICKELL AVENUE SUITE 1430 MIAMI, FL 33131
Effective Date:	08/21/2019
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes

Firm Operations



Organization Affiliates (continued)

Description: THIS ENTITY IS DIRECTLY WHOLLY OWNED BY COMPASS GROUP HOLDINGS INC., THAT IS THE 100% OWNER OF CG COMPASS (USA) LLC

BUNARA S.A. is under common control with the firm.

Business Address: AV. ITALIA 7519
OFICINA 203 CP 11500
MONTEVIDEO, URUGUAY

Effective Date: 01/01/2018

Foreign Entity: Yes

Country: URUGUAY

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: THIS ENTITY IS DIRECTLY OWNED BY COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD LIMITADA, WHICH WHOLLY OWNS COMPASS GROUP HOLDINGS INC., THAT IN TURN IS THE 100% OWNER OF CG COMPASS (USA) LLC

COMPASS ASESORÍAS E INVERSIONES LTDA is under common control with the firm.

Business Address: ROSARIO NORTE 555, PISO 14
LAS CONDES
SANTIAGO, CHILE

Effective Date: 01/01/2018

Foreign Entity: Yes

Country: CHILE

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: THIS ENTITY IS DIRECTLY OWNED BY COMPASS GROUP CHILE INVERSIONES II LTDA Y CIA. EN COMANDITA POR ACCIONES, AN ENTITY DIRECTLY OWNED BY COMPASS GROUP INVESTMENTS ADVISORS, WHICH IS DIRECTLY OWNED BY COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD LIMITADA, AND WHICH WHOLLY OWNS COMPASS GROUP HOLDINGS INC., THAT IN TURN IS THE 100% OWNER OF CG COMPASS (USA) LLC

Firm Operations



Organization Affiliates (continued)

COMPASS GROUP CHILE INVERSIONES II LTDA Y CIA. EN COMANDITA POR ACCIONES is under common control with the firm.

Business Address:	ROSARIO NORTE 555, PISO 14 LAS CONDES SANTIAGO, CHILE
Effective Date:	01/01/2018
Foreign Entity:	Yes
Country:	CHILE
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	THIS ENTITY IS DIRECTLY OWNED BY COMPASS GROUP INVESTMENTS ADVISORS, WHICH IS DIRECTLY OWNED BY COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD LIMITADA, AND WHICH WHOLLY OWNS COMPASS GROUP HOLDINGS INC., THAT IN TURN IS THE 100% OWNER OF CG COMPASS (USA) LLC

COMPASS GROUP URUGUAY INVESTMENTS ADVISORS S.A. is under common control with the firm.

Business Address:	PLAZA INDEPENDENCIA 811 PLANTA BAJA MONTEVIDEO, URUGUAY
Effective Date:	03/31/2010
Foreign Entity:	Yes
Country:	URUGUAY
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	COMPASS GROUP URUGUAY INVESTMENTS ADVISORS S.A. IS 99.99% INDIRECTLY OWNED BY COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD LIMITADA WHICH WHOLLY OWNS COMPASS GROUP HOLDINGS INC. WHICH IN TURN IS THE 100% OWNER OF CG COMPASS (USA) LLC.

COMPASS GROUP GLOBAL ADVISORS SA is under common control with the firm.

Business Address:	WTC FZ DR. LUIS BONAVIDA 1294, OFICINA 2204
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Firm Operations



Organization Affiliates (continued)

	MONTEVIDEO 11300, URUGUAY
Effective Date:	03/31/2010
Foreign Entity:	Yes
Country:	URUGUAY
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	COMPASS GROUP GLOBAL ADVISORS SA. IS INDIRECTLY WHOLLY OWNED BY COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD LIMITADA WHICH WHOLLY OWNS COMPASS GROUP HOLDINGS INC. WHICH IN TURN IS THE 100% OWNER OF CG COMPASS (USA) LLC.

COMPASS PERU S.A. is under common control with the firm.

Business Address:	CALLE AMADOR MERINO REYNA 267 PISO 11 SAN ISIDRO, LIMA, PERU
Effective Date:	03/31/2010
Foreign Entity:	Yes
Country:	PERU
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	COMPASS PERU S.A. IS 99.99% INDIRECTLY OWNED BY COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD LIMITADA WHICH WHOLLY OWNS COMPASS GROUP HOLDINGS INC. WHICH IN TURN IS THE 100% OWNER OF CG COMPASS (USA) LLC.

COMPASS GROUP SAFI S.A. is under common control with the firm.

Business Address:	CALLE AMADOR MERINO REYNA 267 PISO 11 SAN ISIDRO, LIMA, PERU
Effective Date:	03/31/2010
Foreign Entity:	Yes
Country:	PERU

Firm Operations



Organization Affiliates (continued)

Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	COMPASS GROUP SAFI S.A. IS 99.99% INDIRECTLY OWNED BY COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD LIMITADA WHICH WHOLLY OWNS COMPASS GROUP HOLDINGS INC. WHICH IN TURN IS THE 100% OWNER OF CG COMPASS (USA) LLC.

COMPASS INVESTMENTS DE MEXICO S.A. DE C.V. is under common control with the firm.

Business Address:	PASEO DE LOS TAMARINDOS N°90 TORRE 1, PISO 21 MEXICO D.F., MEXICO
Effective Date:	03/31/2010
Foreign Entity:	Yes
Country:	MEXICO
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	COMPASS INVESTMENTS DE MEXICO S.A. DE C.V. IS 80% INDIRECTLY OWNED BY COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD LIMITADA WHICH WHOLLY OWNS COMPASS GROUP HOLDINGS INC. WHICH IN TURN IS THE 100% OWNER OF CG COMPASS (USA) LLC.

COMPASS GROUP S.A. COMISIONISTA DE BOLSA is under common control with the firm.

Business Address:	CARRERA 7 NO. 113-43 OFICINA 1508 BOGOTA, COLOMBIA
Effective Date:	03/31/2010
Foreign Entity:	Yes
Country:	COLOMBIA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	COMPASS GROUP S.A. COMISIONISTA DE BOLSA IS INDIRECTLY WHOLLY OWNED BY COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD

Firm Operations



Organization Affiliates (continued)

LIMITADA WHICH WHOLLY OWNS COMPASS GROUP HOLDINGS INC. WHICH IN TURN IS THE 100% OWNER OF CG COMPASS (USA) LLC.

COMPASS GROUP COLOMBIA SAS is under common control with the firm.

Business Address:	CARRERA 7 NO. 113-43 OFICINA 1508 BOGOTÁ, COLOMBIA
Effective Date:	03/31/2010
Foreign Entity:	Yes
Country:	COLOMBIA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	COMPASS GROUP COLOMBIA SAS IS INDIRECTLY WHOLLY OWNED BY COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD LIMITADA WHICH WHOLLY OWNS COMPASS GROUP HOLDINGS INC. WHICH IN TURN IS THE 100% OWNER OF CG COMPASS (USA) LLC.

COMPASS GROUP CHILE S.A. ADMINISTRADORA GENERAL DE FONDOS is under common control with the firm.

Business Address:	AV. ROSARIO NORTE 555 PISO 14 LAS CONDES, SANTIAGO, CHILE
Effective Date:	03/31/2010
Foreign Entity:	Yes
Country:	CHILE
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	COMPASS GROUP CHILE S.A. ADMINISTRADORA GENERAL DE FONDOS IS 99.9% INDIRECTLY OWNED BY COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD LIMITADA WHICH WHOLLY OWNS COMPASS GROUP HOLDINGS INC. WHICH IN TURN IS THE 100% OWNER OF CG COMPASS (USA) LLC.

COMPASS GROUP S.A. ASESORES DE INVERSIÓN is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: AV. ROSARIO NORTE 555
PISO 14
LAS CONDES, SANTIAGO, CHILE

Effective Date: 03/31/2010

Foreign Entity: Yes

Country: CHILE

Securities Activities: No

Investment Advisory Activities: Yes

Description: COMPASS GROUP S.A. ASESORES DE INVERSIÓN IS 99.7% INDIRECTLY OWNED BY COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD LIMITADA WHICH WHOLLY OWNS COMPASS GROUP HOLDINGS INC. WHICH IN TURN IS THE 100% OWNER OF CG COMPASS (USA) LLC.

COMPASS INVESTMENTS MANAGEMENT S.A. is under common control with the firm.

Business Address: CARLOS PELLEGRINI 1023, PISO 14
C1009ABU
CIUDAD AUTONOMA DE BUENOS AIRES, ARGENTINA

Effective Date: 05/02/2016

Foreign Entity: Yes

Country: ARGENTINA

Securities Activities: No

Investment Advisory Activities: Yes

Description: COMPASS INVESTMENTS MANAGEMENT S.A. IS 99.99% INDIRECTLY OWNED BY COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD LIMITADA WHICH WHOLLY OWNS COMPASS GROUP HOLDINGS INC. WHICH IN TURN IS THE 100% OWNER OF CG COMPASS (USA) LLC.

INVESTIS ASSET MANAGEMENT S.A.S.G.F.C.I. is under common control with the firm.

Business Address: CARLOS PELLEGRINI 1023, PISO 14
C1009ABU
CIUDAD AUTONOMA DE BUENOS AIRES, ARGENTINA

Effective Date: 05/02/2016

Foreign Entity: Yes

Firm Operations



Organization Affiliates (continued)

Country:	ARGENTINA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	INVESTIS ASSET MANAGEMENT S.A.S.G.F.C.I. IS 99.99% INDIRECTLY OWNED BY COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD LIMITADA WHICH WHOLLY OWNS COMPASS GROUP HOLDINGS INC. WHICH IN TURN IS THE 100% OWNER OF CG COMPASS (USA) LLC.

COMPASS GROUP LLC is under common control with the firm.

CRD #:	108772
Business Address:	590 MADISON AVENUE 33RD FLOOR NEW YORK, NY 10022
Effective Date:	10/01/2003
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	COMPASS GROUP LLC IS INDIRECTLY WHOLLY OWNED BY COMPASS GROUP ASSET MANAGEMENT HOLDING, SOCIEDAD LIMITADA WHICH WHOLLY OWNS COMPASS GROUP HOLDINGS INC. WHICH IN TURN IS THE 100% OWNER OF CG COMPASS (USA) 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	1	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 1

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 DEVELOP AND IMPLEMENT AN ANTI-MONEY LAUNDERING (AML) PROGRAM THAT WAS REASONABLY DESIGNED TO ACHIEVE AND MONITOR THE FIRM'S COMPLIANCE WITH REQUIREMENTS OF THE BANK SECRECY ACT AND THE IMPLEMENTING REGULATIONS THEREUNDER. THE FINDINGS STATED THAT THE FIRM'S WRITTEN AML PROCEDURES WERE NOT REASONABLE BECAUSE THEY DID NOT TAKE INTO ACCOUNT THE SPECIFIC AML RISKS ARISING FROM THE FIRM'S BUSINESS MODEL. THE FIRM SERVICED A CUSTOMER BASE THAT INCLUDED CUSTOMERS BASED IN JURISDICTIONS THAT ARE CONSIDERED TO PRESENT HEIGHTENED AML RISKS. ALTHOUGH THE FIRM PERMITTED CUSTOMERS TO WIRE FUNDS INTO AND OUT OF THEIR ACCOUNTS, INCLUDING BY THIRD-PARTY WIRES, THE FIRM'S PROCEDURES DID NOT SET FORTH STEPS TO BE TAKEN TO REVIEW AND INVESTIGATE WIRE TRANSFERS PRIOR TO APPROVAL. THE FIRM'S WRITTEN AML PROCEDURES DID NOT SPECIFY HOW THE FIRM INTENDED TO MONITOR, DETECT AND INVESTIGATE FOR "RED FLAGS" OF SUSPICIOUS ACTIVITY, AND THEY DID NOT LIST REPORTS AND DOCUMENTS THAT THE FIRM INTENDED TO RELY UPON, THE SYSTEMS BY WHICH IT WOULD CONDUCT REVIEWS, THE FREQUENCY OF ANY REVIEWS AND HOW REVIEWS WOULD BE DOCUMENTED. THE FINDINGS ALSO STATED THAT THE FIRM DID NOT IMPLEMENT A SYSTEM REASONABLY TAILORED TO ITS BUSINESS MODEL THAT COULD REASONABLY HAVE BEEN EXPECTED TO DETECT AND CAUSE THE REPORTING OF, INCLUDING THE INVESTIGATION OF AND FOLLOW UP ON, RED FLAGS OF SUSPICIOUS ACTIVITY ARISING FROM WIRE TRANSFER TRANSACTIONS. THE FIRM APPROVED WIRE TRANSFERS BASED ON BRIEF DESCRIPTIONS AS TO THE PURPOSE OF THE WIRES PROVIDED BY CUSTOMERS AND DID NOT INVESTIGATE AND OBTAIN DOCUMENTATION CONCERNING THE SOURCE, DESTINATION, RECIPIENTS AND/OR BUSINESS PURPOSE FOR THE WIRES. AS A RESULT, THE FIRM DID NOT ADEQUATELY CONSIDER OR INQUIRE INTO THE RISKS PRESENTED BY THE WIRE TRANSFERS. THE FIRM FURTHER DID NOT USE ANY EXCEPTION REPORTS IN ITS REVIEW OF WIRE TRANSFERS. IT WAS ONLY AFTER THE FIRM'S CLEARING FIRM INQUIRED ABOUT POTENTIALLY SUSPICIOUS WIRE TRANSACTIONS THAT IT CONDUCTED INVESTIGATIONS. THE FINDINGS ALSO INCLUDED THAT THE FIRM FAILED TO CONDUCT INDEPENDENT AML TESTING AND FAILED TO CONDUCT PERIODIC REVIEWS OF ACCOUNT ACTIVITY FOR CORRESPONDENT ACCOUNTS FOR SIX FOREIGN FINANCIAL INSTITUTIONS (FFIS). FINRA FOUND THAT THE FIRM FAILED TO CHECK THE NAMES OF PERSONS AND ENTITIES ON THE FINANCIAL CRIMES ENFORCEMENT NETWORK'S (FINCEN) LISTS AGAINST THE FIRM'S CUSTOMER BASE AND THOSE WITH WHOM THE FIRM ENGAGED IN ANY TRANSACTION FOR A TOTAL OF 82 BI-WEEKLY PERIODS AND FOR 11 BI-WEEKLY PERIODS THE FIRM FAILED TO CONDUCT SEARCHES IN A TIMELY



MANNER. THE FIRM DID NOT HAVE IN PLACE WRITTEN SUPERVISORY CONTROL PROCEDURES REASONABLY DESIGNED TO REVIEW AND MONITOR THE FIRM'S ACTIVITIES WITH RESPECT TO ELECTRONIC TRANSFERS OF FUNDS. THE FIRM ALSO DID NOT HAVE ANY WRITTEN PROCEDURES TO EITHER VALIDATE INFORMATION ON WIRE REQUESTS PRIOR TO APPROVING THE REQUESTS OR OUTLINE HOW THE FIRM INTENDED TO MONITOR FOR POTENTIALLY FRAUDULENT WIRE TRANSFERS TO THIRD PARTIES FROM CUSTOMER ACCOUNTS. THE FIRM FAILED TO MAINTAIN EVIDENCE OF PRINCIPAL REVIEW OF ITS ELECTRONIC CORRESPONDENCE.

Initiated By: FINRA

Date Initiated: 12/21/2017

Docket/Case Number: [2013038311501](#)

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: 12/21/2017

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 \$75,000.00

Other Sanctions Ordered: UNDERTAKING

Sanction Details: THE FIRM WAS CENSURED, FINED \$75,000 AND WITHIN NO LATER THAN 90 DAYS FROM THE NOTICE OF ACCEPTANCE OF THIS AWC, OR SUCH ADDITIONAL PERIOD AS AGREED TO BY A FINRA STAFF MEMBER IN WRITING, A REGISTERED PRINCIPAL AND EXECUTIVE OFFICER OF THE FIRM, ON BEHALF OF THE FIRM, SHALL SUBMIT A CERTIFICATION THAT THE FIRM'S POLICIES, SYSTEMS AND PROCEDURES (WRITTEN AND OTHERWISE) AND TRAINING ARE REASONABLY DESIGNED WITH RESPECT TO THE FIRM'S COMPLIANCE WITH FINRA RULE 3310 AND THE



REQUIREMENTS OF THE BANK SECRECY ACT AND THE REGULATIONS PROMULGATED THEREUNDER, INCLUDING, BUT NOT LIMITED TO THOSE RELATED TO MONITORING FOR, IDENTIFYING, INVESTIGATING, AND RESPONDING TO RED FLAGS OF SUSPICIOUS TRANSACTIONS IN GENERAL AND SPECIFICALLY WITH RESPECT TO WIRE TRANSFERS TO AND FROM CUSTOMER ACCOUNTS. FINES PAID IN FULL ON JANUARY 8, 2018.

Reporting Source:	Firm
Current Status:	Final
Allegations:	PURSUANT TO LETTER OF ACCEPTANCE, WAIVER AND CONSENT NO. 2013038311501 ACCEPTED BY FINRA ON DECEMBER 21, 2017, AND WITHOUT ADMITTING OR DENYING THE FINDINGS SET FORTH THEREIN, THE FIRM ACCEPTED AND CONSENTED TO CERTAIN SANCTIONS AND THE ENTRY OF FINDINGS THAT, FOR CERTAIN SPECIFIED TIME PERIODS: (1) THE FIRM FAILED TO DEVELOP AND IMPLEMENT AN ANTI-MONEY LAUNDERING PROGRAM THAT WAS REASONABLY DESIGNED TO ACHIEVE AND MONITOR THE FIRM'S COMPLIANCE WITH THE REQUIREMENTS OF THE BANK SECRECY ACT AND THE IMPLEMENTING REGULATIONS THEREUNDER; (2) THE FIRM DID NOT ESTABLISH, MAINTAIN AND ENFORCE REASONABLE SUPERVISORY CONTROL PROCEDURES RELATED TO WIRE TRANSFERS; AND (3) THE FIRM FAILED TO MAINTAIN EVIDENCE OF PRINCIPAL REVIEW OF ELECTRONIC CORRESPONDENCE.
Initiated By:	FINANCIAL INDUSTRY REGULATORY AUTHORITY
Date Initiated:	12/21/2017
Docket/Case Number:	2013038311501
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	FINE AND UNDERTAKING.
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	12/21/2017



Sanctions Ordered:	Censure Monetary/Fine \$75,000.00
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	<p>THE FIRM CONSENTED TO THE IMPOSITION OF: (1) A CENSURE; (2) A FINE OF \$75,000; AND (3) AN UNDERTAKING, PURSUANT TO WHICH, WITHIN NO LATER THAN 90 DAYS FROM THE NOTICE OF ACCEPTANCE OF THE AWC, OR SUCH ADDITIONAL PERIOD AS AGREED TO BY A FINRA STAFF MEMBER IN WRITING, A REGISTERED PRINCIPAL AND EXECUTIVE OFFICER OF THE FIRM, ON BEHALF OF THE FIRM, SHALL SUBMIT A CERTIFICATION THAT THE FIRM'S POLICIES, SYSTEMS AND PROCEDURES (WRITTEN OR OTHERWISE) AND TRAINING ARE REASONABLY DESIGNED WITH RESPECT TO THE FIRM'S COMPLIANCE WITH FINRA RULE 3310 AND THE REQUIREMENTS OF THE BANK SECRECY ACT AND THE REGULATIONS PROMULGATED THEREUNDER, INCLUDING, BUT NOT LIMITED TO THOSE RELATED TO MONITORING FOR, IDENTIFYING, INVESTIGATING, AND RESPONDING TO RED FLAGS OF SUSPICIOUS TRANSACTIONS IN GENERAL AND SPECIFICALLY WITH RESPECT TO WIRE TRANSFERS TO AND FROM CUSTOMER ACCOUNTS. ON JANUARY 8, 2018, THE FIRM PAID TO FINRA THE AFOREMENTIONED FINE.</p>
Firm Statement	FINRA ISSUED A NOTICE OF ACCEPTANCE OF LETTER OF ACCEPTANCE, WAIVER AND CONSENT NO. 2013038311501 ON DECEMBER 21, 2017

End of Report



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