

## BrokerCheck Report

### ROBOTTI SECURITIES, LLC

CRD# 13251

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



For additional information about the contents of this report, please refer to the User Guidance or [www.finra.org/brokercheck](http://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).



ROBOTTI SECURITIES, LLC

CRD# 13251

SEC# 8-28886

Main Office Location

125 PARK AVENUE, SUITE 1607  
NEW YORK, NY 10017  
Regulated by FINRA New York Office

Mailing Address

125 PARK AVENUE, SUITE 1607  
NEW YORK, NY 10017

Business Telephone Number

(212) 986-4800

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 03/07/2003.  
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
- 3 Self-Regulatory Organizations
- 32 U.S. states and territories

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

This firm conducts 12 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	2



## Firm Profile

This firm is classified as a limited liability company.

This firm was formed in New York on 03/07/2003.

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.

### ROBOTTI SECURITIES, LLC

Doing business as ROBOTTI SECURITIES, LLC

CRD# 13251

SEC# 8-28886

### Main Office Location

125 PARK AVENUE, SUITE 1607

NEW YORK, NY 10017

Regulated by FINRA New York Office

### Mailing Address

125 PARK AVENUE, SUITE 1607

NEW YORK, NY 10017

### Business Telephone Number

(212) 986-4800



## Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

### Direct Owners and Executive Officers

<b>Legal Name &amp; CRD# (if any):</b>	ROBOTTI & COMPANY, INCORPORATED
<b>Is this a domestic or foreign entity or an individual?</b>	Domestic Entity
<b>Position</b>	STOCKHOLDER 100% OWNER OF APPLICANT
<b>Position Start Date</b>	07/2003
<b>Percentage of Ownership</b>	75% or more
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	KELLEHER, DENNIS MICHAEL 2107342
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	CHIEF COMPLIANCE OFFICER
<b>Position Start Date</b>	08/2019
<b>Percentage of Ownership</b>	Less than 5%
<b>Does this owner direct the management or policies of the firm?</b>	No
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	MCQUEENEY, DAVID VINCENT 2440806
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	SROP, ROP
<b>Position Start Date</b>	11/2002

## 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?** No

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** MEVORAH, ERWIN I  
1944735

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

**Position** CFO, FIN/OP & SECRETARY

**Position Start Date** 11/2008

**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

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**Legal Name & CRD# (if any):** ROBOTTI, ROBERT EDWARD  
732905

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

**Position** PRESIDENT, CEO, GSP, TREASURER

**Position Start Date** 01/1983

**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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**Legal Name & CRD# (if any):** ROBOTTI, SUZANNE BENSON

## Firm Profile



### Direct Owners and Executive Officers (continued)

	4616454
Is this a domestic or foreign entity or an individual?	Individual
Position	DIRECTOR
Position Start Date	10/2015
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):	SEKLIR, NANCY ELIZABETH 1756843
Is this a domestic or foreign entity or an individual?	Individual
Position	DIRECTOR
Position Start Date	09/1987
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):	WASIAK, KENNETH RONALD 1485703
Is this a domestic or foreign entity or an individual?	Individual
Position	DIRECTOR
Position Start Date	08/1983
Percentage of Ownership	Less than 5%

Firm Profile



Direct Owners and Executive Officers (continued)

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

<b>Legal Name &amp; CRD# (if any):</b>	ROBOTTI, ROBERT EDWARD 732905
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Company through which indirect ownership is established</b>	ROBOTTI & COMPANY, INCORPORATED (PARENT)
<b>Relationship to Direct Owner</b>	DIRECTOR, PRESIDENT, TREASURER, STOCKHOLDER (PARENT)
<b>Relationship Established</b>	01/1983
<b>Percentage of Ownership</b>	50% but less than 75%
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	REILLY, HARRIET MARY 1173063
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Company through which indirect ownership is established</b>	ROBOTTI & COMPANY, INCORPORATED (PARENT)
<b>Relationship to Direct Owner</b>	STOCKHOLDER (PARENT)
<b>Relationship Established</b>	09/1987
<b>Percentage of Ownership</b>	Other General Partners
<b>Does this owner direct the management or policies of the firm?</b>	No
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	REILLY, JOSEPH EDWARD
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## Firm Profile



### Indirect Owners (continued)

	1094364
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Company through which indirect ownership is established</b>	ROBOTTI & COMPANY, INCORPORATED PARTENT
<b>Relationship to Direct Owner</b>	STOCKHOLDER (PARENT)
<b>Relationship Established</b>	09/1987
<b>Percentage of Ownership</b>	Other General Partners
<b>Does this owner direct the management or policies of the firm?</b>	No
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	SAVVAS, CATHERINE REILLY 1756840
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Company through which indirect ownership is established</b>	ROBOTTI & COMPANY, INCORPORATED (PARENT)
<b>Relationship to Direct Owner</b>	STOCKHOLDER (PARENT)
<b>Relationship Established</b>	09/1987
<b>Percentage of Ownership</b>	Other General Partners
<b>Does this owner direct the management or policies of the firm?</b>	No
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	SEKLIR, NANCY ELIZABETH 1756843
<b>Is this a domestic or foreign entity or an individual?</b>	Individual

Firm Profile



Indirect Owners (continued)

Company through which indirect ownership is established	ROBOTTI & COMPANY, INCORPORATED (PARENT)
Relationship to Direct Owner	DIRECTOR & STOCKHOLDER (PARENT)
Relationship Established	09/1987
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

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Firm History

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



<b>This firm was previously:</b>	ROBOTTI & COMPANY, INCORPORATED
<b>Date of Succession:</b>	07/01/2003
<b>Predecessor CRD#:</b>	13251
<b>Description</b>	SEPARATING ADVISORY BUSINESS FROM BROKER DEALER. NO CHANGE IN OWNERSHIP OR CONTROL LLC WILL ASSUME ALL ASSETS AND LIABLITIES OF BROKER DEALER

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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, 3 SROs and 32 U.S. states and territories.**

Federal Regulator	Status	Date Effective
SEC	Approved	03/01/1983

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	06/20/1983
Investors' Exchange LLC	Approved	09/07/2016
Nasdaq Stock Market	Approved	07/12/2006

## Firm Operations



### Registrations (continued)

U.S. States & Territories	Status	Date Effective
Arizona	Approved	04/01/1997
California	Approved	12/11/1989
Colorado	Approved	08/06/2021
Connecticut	Approved	01/09/1984
Delaware	Approved	01/07/2022
District of Columbia	Approved	07/31/1997
Florida	Approved	02/01/1990
Georgia	Approved	01/04/2022
Idaho	Approved	08/19/1996
Illinois	Approved	04/04/1997
Indiana	Termination Requested	12/31/2019
Maine	Approved	05/10/2013
Maryland	Approved	06/12/1996
Massachusetts	Approved	05/16/1996
Michigan	Approved	10/05/2022
Missouri	Approved	04/12/2018
Nebraska	Approved	11/19/2009
Nevada	Approved	10/26/2023
New Jersey	Approved	04/10/1984
New York	Approved	07/11/1983
North Carolina	Approved	08/26/2003
Ohio	Approved	02/25/2022
Oklahoma	Approved	11/22/2021
Oregon	Approved	01/17/2002
Pennsylvania	Approved	01/03/1984
Rhode Island	Approved	05/08/2019
South Carolina	Approved	05/22/1996
Texas	Approved	03/22/1996
Utah	Approved	12/16/1996
Virginia	Approved	03/26/1997
Washington	Approved	06/22/2005
Wyoming	Approved	09/14/2023



## 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 12 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)
Mutual fund underwriter or sponsor
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
Trading securities for own account
Private placements of securities
Other - FINRA GRANTED ROBOTTI & COMPANY, LLC THE ABILITY TO ENGAGE IN MERGERS AND ACQUISITIONS.

#### 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.

<b>Name:</b>	PERSHING LLC
<b>CRD #:</b>	7560
<b>Business Address:</b>	ONE PERSHING PLAZA 10TH FLOOR JERSEY CITY, NJ 07399
<b>Effective Date:</b>	03/23/2011
<b>Description:</b>	FULLY DISCLOSED CLEARING ARRANGEMENT HAS BEEN SIGNED AND FILED WITH, AND APPROVED BY THE NEW YORK STOCK EXCHANGE AND COMPLIES WITH NYSE RULES 382 AND 405. A COPY OF THIS AGREEMENT IS AVAILABLE UPON REQUEST. PERSHING LLC BOUGHT OUR PREVIOUS CLEARING FIRM OF JEFFERIES & CO. INC.

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## Firm Operations

### Industry Arrangements



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

**Name:** PERSHING LLC

**CRD #:** 7560

**Business Address:** ONE PERSHING PLAZA  
10TH FLOOR  
JERSEY CITY, NJ 07399

**Effective Date:** 03/23/2011

**Description:** FULLY DISCLOSED CLEARING ARRANGEMENT HAS BEEN SIGNED AND FILED WITH, AND APPROVED BY THE NEW YORK STOCK EXCHANGE AND COMPLIES WITH NYSE RULES 382 AND 405. A COPY OF THIS AGREEMENT IS AVAILABLE UPON REQUEST. PERSHING LLC BOUGHT OUR PREVIOUS CLEARING FIRM OF JEFFERIES & CO. INC.

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

**Name:** PERSHING LLC

**CRD #:** 7560

**Business Address:** ONE PERSHING PLAZA  
10TH FLOOR  
JERSEY CITY, NJ 07399

**Effective Date:** 03/23/2011

**Description:** FULLY DISCLOSED CLEARING ARRANGEMENT HAS BEEN SIGNED AND FILED WITH, AND APPROVED BY THE NEW YORK STOCK EXCHANGE AND COMPLIES WITH NYSE RULES 382 AND 405. A COPY OF THIS AGREEMENT IS AVAILABLE UPON REQUEST. PERSHING LLC BOUGHT OUR PREVIOUS CLEARING FIRM OF JEFFERIES & CO. INC.

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

**Name:** PERSHING LLC

**CRD #:** 7560

**Business Address:** ONE PERSHING PLAZA  
10TH FLOOR  
JERSEY CITY, NJ 07399

**Effective Date:** 03/23/2011

**Description:** FULLY DISCLOSED CLEARING ARRANGEMENT HAS BEEN SIGNED AND FILED WITH, AND APPROVED BY THE NEW YORK STOCK EXCHANGE

## Firm Operations



### Industry Arrangements (continued)

AND COMPLIES WITH NYSE RULES 382 AND 405. A COPY OF THIS AGREEMENT IS AVAILABLE UPON REQUEST. PERSHING LLC BOUGHT OUR PREVIOUS CLEARING FIRM OF JEFFERIES & CO. INC.

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### 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.**

**JEN CAPITAL MANAGEMENT, LLC is under common control with the firm.**

**Business Address:** 125 PARK AVENUE  
SUITE 1607  
NEW YORK, NY 10017

**Effective Date:** 03/16/2022

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** Yes

**Description:** ROBOTTI & COMPANY, INCORPORATED ("PARENT") IS THE OWNER OF 100% OF THE LLC INTERESTS OF EACH OF THE FIRM AND JEN CAPITAL MANAGEMENT, LLC ("JEN") FKA OSSIA CAPITAL MANAGEMENT, LLC. ACCORDINGLY, JEN IS AN AFFILIATE OF THE FIRM BECAUSE JEN AND THE FIRM ARE UNDER COMMON CONTROL. JEN IS THE MANAGING MEMBER OF THE JEN CAPITAL PARTNERS, LLC.

**ROBOTTI GLOBAL MANAGEMENT COMPANY, LLC is under common control with the firm.**

**Business Address:** 125 PARK AVENUE  
SUITE 1607  
NEW YORK, NY 10017

**Effective Date:** 04/23/2007

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Description:** ROBOTTI & COMPANY, INCORPORATED ("PARENT") IS THE OWNER OF 100% OF THE LLC INTERESTS OF EACH OF THE FIRM AND ROBOTTI GLOBAL MANAGEMENT COMPANY, LLC ("RGMC"). ACCORDINGLY, RGMC IS AN AFFILIATE OF THE FIRM BECAUSE RGMC AND THE FIRM ARE UNDER COMMON CONTROL. RGMC IS THE MANAGING MEMBER OF THE ROBOTTI GLOBAL FUND, LLC.

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#### ROBOTTI & COMPANY ADVISORS, LLC is under common control with the firm.

**CRD #:** 128093

**Business Address:** 125 PARK AVENUE  
SUITE 1607  
NEW YORK, NY 10017

**Effective Date:** 08/25/2003

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** ROBOTTI & COMPANY, INCORPORATED ("PARENT") IS THE 100% OWNER OF THE LLC INTERESTS OF EACH OF THE FIRM AND ROBOTTI & COMPANY ADVISORS, LLC ("ADVISER"). ACCORDINGLY, THE ADVISER IS AN AFFILIATE OF THE FIRM BECAUSE THE ADVISER AND THE FIRM ARE UNDER COMMON CONTROL. THE ADVISER IS AN INVESTMENT ADVISER REGISTERED WITH THE SEC UNDER THE INVESTMENT ADVISERS ACT OF 1940, AS AMENDED, AND PROVIDES INVESTMENT ADVISORY SERVICES TO POOLED INVESTMENT VEHICLES AND MANAGED ACCOUNTS.

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#### RAVENSWOOD MANAGEMENT COMPANY, LLC is under common control with the firm.

**Business Address:** 125 PARK AVENUE  
SUITE 1607  
NEW YORK, NY 10017

**Effective Date:** 06/01/2019

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

## Firm Operations



### Organization Affiliates (continued)

**Investment Advisory Activities:** No

**Description:** BOB ROBOTTI IS THE MAJORITY OWNER OF THE LLC INTERESTS IN RAVENSWOOD MANAGEMENT COMPANY, LLC ("RMC"). HE IS ALSO MAJORITY SHAREHOLDER OF ROBOTTI & COMPANY, INCORPORATED ("PARENT"), WHICH IS THE PARENT COMPANY OF THE FIRM. ACCORDINGLY, RMC AND THE FIRM ARE UNDER COMMON CONTROL. RMC IS THE GP OF THE RAVENSWOOD INVESTMENT COMPANY, L.P., RAVENSWOOD II, LP AND RAVENSWOOD INVESTMENTS III, LP, EACH OF WHICH IS A POOLED INVESTMENT VEHICLE INVESTING IN SECURITIES FOR ITS OWN ACCOUNT.

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**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	2	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 2

**Reporting Source:** Firm

**Current Status:** Final



**Allegations:** TRANSACTIONS EFFECTED PRIOR TO REGISTRATION.

**Initiated By:** MARYLAND SECURITIES COMMISSIONER

**Date Initiated:** 06/12/1996

**Docket/Case Number:** BD-96-0158

**Principal Product Type:** Equity - OTC

**Other Product Type(s):** EQUITY LISTED

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

**Other Sanction(s)/Relief Sought:**

**Resolution:** Order

**Resolution Date:** 06/12/1996

**Sanctions Ordered:** Monetary/Fine \$500.00

**Other Sanctions Ordered:**

**Sanction Details:** FINE OF \$500 PAID ON 6/12/96

**Firm Statement** ROBOTTI & COMPANY, INCORPORATED INADVERTENTLY OPENED TWO BROKERAGE ACCOUNTS. EACH ACCOUNT WAS FOR A COLLEGE CLASSMATE OF THE REGISTERED REPRESENTATIVE; IN WHICH ONLY THREE TRANSACTIONS WERE EXECUTED. AT THAT TIME, THE APPLICANT RELIED UPON MARYLAND'S STATUTE WHICH PERMITS "NOT MORE THAN FIFTEEN OFFERS TO BUY OR SELL INTO THE STATE" AS A POSSIBLE EXEMPTION.

#### Disclosure 2 of 2

**Reporting Source:** Regulator

**Current Status:** Final

**Allegations:** UNREGISTERED DEALER ACTIVITY

**Initiated By:** ILLINOIS SECURITIES DEPARTMENT

**Date Initiated:** 04/01/1997

**Docket/Case Number:** 9700226

**URL for Regulatory Action:**

**Principal Product Type:**



**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:**

**Other Sanction(s)/Relief Sought:**

**Resolution:** Settled

**Resolution Date:** 04/03/1997

**Sanctions Ordered:**

**Other Sanctions Ordered:**

**Sanction Details:** SETTLEMENT AGREEMENT ISSUED APRIL 3, 1997. THE SETTLEMENT AGREEMENT WAS ISSUED WITH NO FINDINGS OF FACT OR CONCLUSIONS OF LAW AS TO ANY VIOLATION. THE RESPONDENT HAS AGREED TO PAY BACK REGISTRATION FEES THAT WOULD HAVE BEEN DUE TO THE DEPARTMENT AND PAY FOR THE COST OF THE INVESTIGATION.

**Regulator Statement** CONTACT: 217-785-4948

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** UNREGISTERED DEALER ACTIVITY AND FAILURE TO FILE A REQUIRED DOCUMENT

**Initiated By:** ILLINOIS SECRETARY OF STATE

**Date Initiated:** 04/01/1997

**Docket/Case Number:** FILE NO. 9700226

**Principal Product Type:** Equity - OTC

**Other Product Type(s):** EQUITY LISTED

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

**Other Sanction(s)/Relief Sought:**

**Resolution:** Settled

**Resolution Date:** 04/03/1997

**Sanctions Ordered:**

**Other Sanctions Ordered:****Sanction Details:**

ROBOTTI & COMPANY, INCORPORATED, WHEN APPLYING FOR REGISTRATION IN ILLINOIS, DISCLOSED THAT IT HAD TRANSACTED EXEMPT TRADES, WHICH IT BELIEVED PROVIDED AN EXEMPTION FROM ILLINOIS' BROKER-DEALER REGISTRATION REQUIREMENTS (I.E. TRANSACTIONS WITH FINANCIAL INSTITUTIONS AND INSTITUTIONAL INVESTORS). THE ILLINIOS SECURITIES DEPT. DID NOT AGREE THAT ALL OF THE TRANSACTIONS SATISFIED THE AVAILABLE EXEMPTIONS, A NOTICE OF HEARING WAS ISSUED AND A SETTLEMENT AGREEMENT WAS ENTERED INTO, WHEREBY ROBOTTI & COMPANY REIMBURSED THE ILLINOIS SECRETARY OF STATE \$924 FOR REGISTRATION FEES AND \$1000 FOR INVESTIGATIVE COSTS.

**Firm Statement**

ROBOTTI & COMPANY, INCORPORATED, WHEN APPLYING FOR REGISTRATION IN ILLINOIS, DISCLOSED THAT IT HAD TRANSACTED EXEMPT TRADES, WHICH IT BELIEVED PROVIDED AN EXEMPTION FROM ILLINOIS' BROKER-DEALER REGISTRATION REQUIREMENTS (I.E. TRANSACTIONS WITH FINANCIAL INSTITUTIONS AND INSTITUTIONAL INVESTORS). THE ILLINIOS SECURITIES DEPT. DID NOT AGREE THAT ALL OF THE TRANSACTIONS SATISFIED THE AVAILABLE EXEMPTIONS, A NOTICE OF HEARING WAS ISSUED AND A SETTLEMENT AGREEMENT WAS ENTERED INTO, WHEREBY ROBOTTI & COMPANY REIMBURSED THE ILLINOIS SECRETARY OF STATE \$924 FOR REGISTRATION FEES AND \$1000 FOR INVESTIGATIVE COSTS.

**End of Report**



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