

BrokerCheck Report

ACP SECURITIES, LLC

CRD# 139049

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When communicating online or investing with any professional, make sure you know who you're dealing with. <u>Imposters</u> might link to sites like BrokerCheck from <u>phishing</u> or similar scam websites, or through <u>social media</u>, 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
 - o information that regulators report regarding disciplinary actions or allegations against firms or brokers.

How current is this information?

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.
- What if I want to check the background of an investment adviser firm or investment adviser representative?
- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at https://www.adviserinfo.sec.gov. In the alternative, you may search the IAPD website directly or contact your state securities regulator at http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414.
- Are there other resources I can use to check the background of investment professionals?
- FINRA recommends that you learn as much as possible about an investment professional before
 deciding to work with them. Your state securities regulator can help you research brokers and investment adviser
 representatives doing business in your state.

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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.

www.finra.org/brokercheck User Guidance

ACP SECURITIES, LLC

CRD# 139049

SEC# 8-67185

Main Office Location

1200 BRICKELL AVENUE SUITE 1700 MIAMI, FL 33131 Regulated by FINRA Florida Office

Mailing Address

1200 BRICKELL AVENUE SUITE 1700 MIAMI, FL 33131

Business Telephone Number

305-670-4180

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 Florida on 11/04/2005. 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
- 15 U.S. states and territories

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

This firm conducts 14 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:

Туре	Count
Regulatory Event	4

This firm is classified as a limited liability company.

This firm was formed in Florida on 11/04/2005.

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.

ACP SECURITIES, LLC

Doing business as ACP SECURITIES, LLC

CRD# 139049

SEC# 8-67185

Main Office Location

1200 BRICKELL AVENUE SUITE 1700 MIAMI, FL 33131

Regulated by FINRA Florida Office

Mailing Address

1200 BRICKELL AVENUE SUITE 1700 MIAMI, FL 33131

Business Telephone Number

305-670-4180



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): ACP CAPITAL HOLDINGS, LLC

Is this a domestic or foreign entity or an individual?

Domestic Entity

Position SHAREHOLDER

Position Start Date 11/2005

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):

ANDREWS, MICHAEL ALAN

6227932

Is this a domestic or foreign entity or an individual?

Individual

CHIEF COMPLIANCE OFFICER

Position Start Date

09/2025

Percentage of Ownership

Less than 5%

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

No

Is this a public reporting

No

company?

Position

ENDERE, ESTEBAN

4708937

Is this a domestic or foreign entity or an individual?

Legal Name & CRD# (if any):

Individual

Position CHIEF EXECUTIVE OFFICER

Position Start Date 06/2012

User Guidance

Direct Owners and Executive Officers (continued)

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of Yes

the firm?

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

GILMAN, ROBERT CRAIG

1738412

Is this a domestic or foreign

entity or an individual?

Individual

Position

FINOP

Position Start Date

11/2015

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

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



Indirect Owners

Legal Name & CRD# (if any): BIDAU, EZEQUIEL

4477483

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is established

ACP CAPITAL HOLDINGS, LLC

Relationship to Direct Owner

MEMBER, MANAGING DIRECTOR

Relationship Established

02/2017

Percentage of Ownership

25% but less than 50%

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

Yes

Is this a public reporting company?

No

company:

ENDERE, ESTEBAN

4708937

Is this a domestic or foreign entity or an individual?

Legal Name & CRD# (if any):

Individual

Company through which indirect ownership is established

ACP CAPITAL HOLDINGS, LLC

Relationship to Direct Owner

MEMBER, MANAGING DIRECTOR

Relationship Established

03/2011

Percentage of Ownership

25% but less than 50%

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

Yes

Is this a public reporting

company?

No

Legal Name & CRD# (if any): SIVERONI, PIERO

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User Guidance

Indirect Owners (continued)

5535508

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is established

ACP CAPITAL HOLDINGS, LLC

Relationship to Direct Owner

MEMBER, MANAGING DIRECTOR

Relationship Established

09/2020

Percentage of Ownership

25% but less than 50%

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

Yes

Is this a public reporting

No

company?

Firm History

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

FINCA

No information reported.





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 15 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	05/23/2006

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

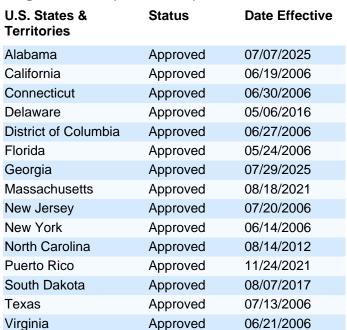
A broker-dealer and government securities broker or dealer: Yes

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	05/23/2006

Registrations (continued)





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 14 types of businesses.

Types of Business

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 retailer

U S. government securities broker

Municipal securities broker

Solicitor of time deposits in a financial institution

Real estate syndicator

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

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

Trading securities for own account

Private placements of securities

Broker or dealer involved in a networking, kiosk or similar arrangment with a: bank, savings bank or association, or credit union

Other - THE FIRM WILL CONDUCT M&A ADVISORY BUSINESS. PROP TRADING WILL BE IN FIXED INCOME SECURITIES ONLY.

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:





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: INTERACTIVE BROKERS LLC

CRD #: 36418

Business Address: ONE PICKWICK PLAZA-

2ND FL.

GREENWICH, CT 06830

Effective Date: 11/11/2022

Description: ACP SECURITIES IS AN INTRODUCING BROKER WITH A CLEARING

AGREEMENT WITH INTERACTIVE BROKERS LLC.

Name: PERSHING LLC

CRD #: 7560

Business Address: ONE PERSHING PLAZA

10TH FLOOR

JERSEY CITY, NJ 07399

Effective Date: 05/25/2006

Description: ACP SECURITIES LLC INTRODUCES ITS CLIENTS TO PERSHING LLC.

Industry Arrangements



This firm does not have books or records maintained by a third party.

This firm does not have accounts, funds, or securities maintained by a third party.

This firm does not have customer accounts, funds, or securities maintained by a third party.

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.

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.

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

CRD #: 138556

Business Address: 1450 BRICKELL AVENUE

SUITE 1490 MIAMI, FL 33131

Effective Date: 12/15/2005

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory

Activities:

Yes

Description: ACP CAPITAL MANAGEMENT, LLC AND THE APPLICANT ARE UNDER

COMMON OWNERSHIP.

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	4	0



Disclosure Event Details

What you should know about reported disclosure events:

- 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:
 - o A disclosure event may have a status of pending, on appeal, or final.
 - A "pending" event involves allegations that have not been proven or formally adjudicated.
 - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" event has been concluded and its resolution is not subject to change.
 - o A final event generally has a disposition of adjudicated, settled or otherwise resolved.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally involves an agreement by the parties to resolve the matter.
 Please note that 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 4

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 WILLFULLY VIOLATED SECTION 17(A)(1) OF THE SECURITIES EXCHANGE ACT OF 1934, EXCHANGE ACT RULE 17A-14, AND FINRA RULE 2010 BY NOT DISCLOSING ON THE FIRM'S CUSTOMER RELATIONSHIP SUMMARY (FORM CRS) THAT ONE OF ITS ASSOCIATED PERSONS WHO HAD BECOME ASSOCIATED WITH THE FIRM HAD DISCIPLINARY HISTORY, INCLUDING FOR USING A NON-FIRM-APPROVED COMMUNICATIONS PLATFORM TO COMMUNICATE WITH A CUSTOMER REGARDING FIRM BUSINESS. THE FINDINGS STATED THAT INFORMATION CONCERNING THE ASSOCIATED PERSON'S DISCIPLINARY HISTORY WAS AVAILABLE TO THE FIRM THROUGH FINRA'S CENTRAL

REGISTRATION DEPOSITORY (CRD) AND IN BROKERCHECK.

NEVERTHELESS, THE FIRM DID NOT UPDATE ITS FORM CRS TO DISCLOSE THIS INFORMATION UNTIL APPROXIMATELY TWO AND A HALF YEARS

AFTER THE ASSOCIATED PERSON JOINED THE FIRM.

Initiated By: FINRA

Date Initiated: 11/15/2024

Docket/Case Number: 2023077080601

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: 11/15/2024

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 \$20,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$20,000. THE FIRM UNDERSTANDS

THAT THIS SETTLEMENT INCLUDES A FINDING THAT IT WILLFULLY

VIOLATED SECTION 17(A)(1) OF THE SECURITIES EXCHANGE ACT OF 1934



AND RULE 17A-14 THEREUNDER, AND THAT UNDER ARTICLE III, SECTION 4

OF FINRA'S BY-LAWS, THIS MAKES RESPONDENT SUBJECT TO A

STATUTORY DISQUALIFICATION WITH RESPECT TO MEMBERSHIP. FINE

PAID IN FULL ON NOVEMBER 25, 2024.

Reporting Source: Firm

Current Status: Final

Allegations: FROM JULY 2021 TO JANUARY 2024, THE FIRM DID NOT DISCLOSE ON THE

FIRM'S CUSTOMER RELATIONSHIP SUMMARY (FORM CRS) THAT ONE OF

ITS ASSOCIATED PERSONS HAD DISCIPLINARY HISTORY.

Initiated By: FINRA

Date Initiated: 10/25/2024

Docket/Case Number: 2023077080601

Principal Product Type: Other

Other Product Type(s): NO PRODUCT

Principal Sanction(s)/Relief

Sought:

Censure

Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/25/2024

Sanctions Ordered: Censure

Monetary/Fine \$20,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$20,000

Disclosure 2 of 4

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 REPORTED TRACE-ELIGIBLE SECURITIES TRANSACTIONS WITH FINRA MEMBER BROKER-DEALERS TO TRACE INDICATING THAT THE CONTRA-PARTY FOR SUCH TRANSACTIONS WAS "C" (CUSTOMER), INSTEAD OF USING THE



MARKET PARTICIPANT IDENTIFIER ASSIGNED TO EACH OF THE

RESPECTIVE FINRA MEMBER BROKER-DEALERS. THE FINDINGS STATED THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN AND ENFORCE A SUPERVISORY SYSTEM AND WRITTEN SUPERVISORY PROCEDURES (WSPS) THAT WERE REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH ALL APPLICABLE SECURITIES LAWS AND REGULATIONS INCLUDING

TRACE-ELIGIBLE SECURITIES TRANSACTION REPORTING.

Initiated By: FINRA

Date Initiated: 03/05/2018

Docket/Case Number: 2016047563501

Principal Product Type: Other

Other Product Type(s): TRACE-ELIGIBLE SECURITIES

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Nο

Resolution Date: 03/05/2018

Does the order constitute a

final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or

deceptive conduct?

Sanctions Ordered: Censure

Monetary/Fine \$17,500.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$17,500. FINES PAID IN FULL ON

APRIL 10, 2018.

Reporting Source: Firm

Current Status: Final

Allegations: DURING THE PERIOD FROM OCTOBER 3, 2014 THROUGH FEBRUARY 19,

2016, THE FIRM FAILED TO REPORT TO TRACE THE CORRECT CONTRA-

PARTY'S IDENTIFIER IN 352 TRANSACTIONS IN TRACE-ELIGIBLE

SECURITIES. AS A RESULT OF THE FOREGOING CONDUCT, THE FIRM



VIOLATED FINRA RULE 6730(C).

ADDITIONALLY, DURING THE RELEVANT PERIOD, THE FIRM FAILED TO ESTABLISH, MAINTAIN AND ENFORCE A SUPERVISORY SYSTEM AND WSPS THAT WERE REASONABLY DESIGNED TO ACHEIVE COMPLIANCE WITH ALL APPLICABLE SECURITIES LAWS AND REGULATIONS INCLUDING TRACE-ELIGIBLE SECURITIES TRANSACTIONS REPORTING. THE FIRM VIOLATED NASD CONDUCT CODE RULE 3010 (PRIOR TO DECEMBER 1, 2014) AND FINRA RULES 3310 (COMMENCING ON OR AFTER DECEMBER 1, 2014).

Initiated By: FINRA

Date Initiated: 03/05/2018

Docket/Case Number: 2016047563501

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Censure

Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 03/05/2018

Sanctions Ordered: Censure

Monetary/Fine \$17,500.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$17,500.

Disclosure 3 of 4

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 REPORT 78 TRANSACTIONS IN TRADE REPORTING AND COMPLIANCE ENGINE (TRACE)-ELIGIBLE CORPORATE DEBT SECURITIES TO TRACE

WITHIN THE TIME REQUIRED BY FINRA RULE 6730(A).

Initiated By: FINRA

Date Initiated: 02/22/2017



Docket/Case Number: 2015046333301

Principal Product Type:

Debt - Corporate

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

No

Resolution Date: 02/22/2017

Does the order constitute a

final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or

deceptive conduct?

Sanctions Ordered: Censure

Monetary/Fine \$12,500.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$12,500. FINE PAID IN FULL ON

3/17/17.

Reporting Source: Firm

Current Status: Final

Allegations: THE FIRM FAILED TO REPORT 78 TRANSACTIONS IN TRADE REPORTING

AND COMPLIANCE ENGINE (TRACE)-ELIGIBLE CORPORATE DEBT SECURITIES TO TRACE WITHIN THE TIME REQUIRED BY FINRA RULE

6730(A).

Initiated By: FINRA

Date Initiated: 02/22/2017

Docket/Case Number: 2015046333301

Principal Product Type: Debt - Corporate

Other Product Type(s):

Principal Sanction(s)/Relief

Relief Censure

Sought:



Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 02/22/2017

Sanctions Ordered: Censure

Monetary/Fine \$12,500.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$12,500.

Disclosure 4 of 4

Reporting Source: Regulator

Current Status: Final

Allegations: FINRA RULE 6730: THE MEMBER FIRM FAILED TO REPORT TO TRACE

TRANSACTIONS IN TRACE-ELIGIBLE SECURITIES THAT IT WAS REQUIRED

TO REPORT.

Initiated By: FINRA

Date Initiated: 08/21/2013

Docket/Case Number: 2012030479401

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)

No

Resolution Date: 08/21/2013

Does the order constitute a

final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or

deceptive conduct?

Sanctions Ordered: Monetary/Fine \$5,000.00



Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED

TO THE DESCRIBED SANCTION AND TO THE ENTRY OF FINDINGS;

THEREFORE THE FIRM IS FINED \$5,000. FINE PAID IN FULL ON SEPTEMBER

9, 2013.

Reporting Source: Firm

Current Status: Final

Allegations: DURING THE PERIOD FROM JULY 9, 2011 THROUGH NOVEMBER 25, 2012,

ACP FAILED TO REPORT TO TRACE 18 TRANSACTIONS IN TRACE-ELIGIBLE SECURITIES THAT IT WAS REQUIRED TO REPORT. AS A RESULT OF THE

FOREGOING CONDUCT, THE FIRM VIOLATED FINRA RULE 6730.

Initiated By: FINRA

Date Initiated: 08/21/2013

Docket/Case Number: 2012030479401

Principal Product Type:

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

No Product

Other

Resolution Date: 08/21/2013

Sanctions Ordered: Monetary/Fine \$5,000.00

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 FINED \$5,000.

www.finra.org/brokercheck

End of Report



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