

BrokerCheck Report

COMMERCE STREET CAPITAL, LLC

CRD# 143797

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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

COMMERCE STREET CAPITAL, LLC

CRD# 143797

SEC# 8-67606

Main Office Location

1445 ROSS AVE. SUITE 2700 DALLAS, TX 75202 Regulated by FINRA Dallas Office

Mailing Address

1445 ROSS AVE. SUITE 2700 DALLAS, TX 75202

Business Telephone Number

214-545-6800

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 Texas on 01/18/2007. 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
- 52 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? $\ensuremath{\text{\textbf{No}}}$

This firm conducts 14 types of businesses.

This firm is affiliated with financial or investment institutions.

This firm does not have 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?

No

This firm is classified as a limited liability company.

This firm was formed in Texas on 01/18/2007.

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.

COMMERCE STREET CAPITAL, LLC
Doing business as COMMERCE STREET CAPITAL, LLC

CRD# 143797 **SEC#** 8-67606

Main Office Location

1445 ROSS AVE. SUITE 2700 DALLAS, TX 75202

Regulated by FINRA Dallas Office

Mailing Address

1445 ROSS AVE. SUITE 2700 DALLAS, TX 75202

Business Telephone Number

214-545-6800



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): COMMERCE STREET HOLDINGS, LLC

Is this a domestic or foreign entity or an individual?

Domestic Entity

Position MEMBER
Position Start Date 01/2007

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): GROSS, \

GROSS, WILLIAM DUDLEY

1032405

Is this a domestic or foreign entity or an individual?

Individual

Position CHAIRMAN

Position Start Date 01/2007

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): HASHAWAY, BOBBY LEE

5675925

Is this a domestic or foreign entity or an individual?

Individual

Position CCO, COO, EVP, SECRETARY

Position Start Date 01/2014

User Guidance

Direct Owners and Executive Officers (continued)

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of

Yes

Is this a public reporting

company?

the firm?

No

Legal Name & CRD# (if any):

JOHN, VARKEY (NMN)

4530162

Is this a domestic or foreign entity or an individual?

Individual

Position

FINOP

Position Start Date

03/2017

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of

No

No

the firm?

Is this a public reporting

company?

Legal Name & CRD# (if any):

WILEY, DORY ALAN

2034240

Is this a domestic or foreign entity or an individual?

Individual

entity or an individual?

PRESIDENT, CEO

Position Start Date

01/2007

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of

Yes

the firm?

Position

Is this a public reporting

company?

No

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

FINCA

Indirect Owners

Legal Name & CRD# (if any): GROSS, WILLIAM DUDLEY

1032405

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is established

COMMERCE STREET HOLDINGS, LLC

Relationship to Direct Owner

PARTNER

Relationship Established

01/2007

Percentage of Ownership

50% but less than 75%

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

Yes

Is this a public reporting

No

company?

Legal Name & CRD# (if any): WILEY, DORY ALAN

2034240

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is established

COMMERCE STREET HOLDINGS, LLC

Relationship to Direct Owner

PARTNER

Relationship Established

01/2007

Percentage of Ownership

50% but less than 75%

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

Yes

Is this a public reporting

company?

No

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 52 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	09/18/2007

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	09/18/2007





U.S. States & Territories	Status	Date Effective
Alabama	Approved	12/21/2007
Alaska	Approved	10/05/2007
Arizona	Approved	11/07/2007
Arkansas	Approved	10/09/2007
California	Approved	10/01/2007
Colorado	Approved	01/16/2008
Connecticut	Approved	10/29/2007
Delaware	Approved	11/13/2007
District of Columbia	Approved	10/16/2007
Florida	Approved	02/29/2008
Georgia	Approved	10/22/2007
Hawaii	Approved	01/14/2008
Idaho	Approved	09/27/2007
Illinois	Approved	10/11/2007
Indiana	Approved	10/12/2007
Iowa	Approved	10/22/2007
Kansas	Approved	10/29/2007
Kentucky	Approved	10/01/2007
Louisiana	Approved	10/02/2007
Maine	Approved	11/30/2007
Maryland	Approved	10/09/2007
Massachusetts	Approved	01/29/2008
Michigan	Approved	10/29/2007
Minnesota	Approved	10/02/2007
Mississippi	Approved	09/27/2007
Missouri	Approved	11/21/2007
Montana	Approved	10/10/2007
Nebraska	Approved	10/25/2007
Nevada	Approved	10/05/2007
New Hampshire	Approved	11/02/2007
New Jersey	Approved	12/04/2007
New Mexico	Approved	10/17/2007
New York	Approved	10/10/2007

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	11/20/2007
North Dakota	Approved	10/12/2007
Ohio	Approved	10/09/2007
Oklahoma	Approved	10/03/2007
Oregon	Approved	10/10/2007
Pennsylvania	Approved	10/15/2007
Puerto Rico	Approved	11/03/2010
Rhode Island	Approved	10/26/2007
South Carolina	Approved	10/09/2007
South Dakota	Approved	10/03/2007
Tennessee	Approved	03/06/2008
Texas	Approved	08/08/2007
Utah	Approved	11/09/2007
Vermont	Approved	10/24/2007
Virginia	Approved	10/17/2007
Washington	Approved	10/01/2007
West Virginia	Approved	10/01/2007
Wisconsin	Approved	11/05/2007
Wyoming	Approved	10/10/2007

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 dealer

U S. government securities broker

Broker or dealer selling oil and gas interests

Put and call broker or dealer or option writer

Broker or dealer selling securities of only one issuer or associate issuers (other than mutual funds)

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

Other - COMMERCE STREET CAPITAL, LLC PROVIDES MERGER AND ACQUISITION WORK AND FAIRNESS OPINIONS TO THEIR CLIENTS. COMMERCE STREET CAPITAL LLC WILL ALSO ENGAGE IN INVESTMENT BANKING ACTIVITIES.

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 not refer or introduce customers to other brokers and dealers.

Industry Arrangements



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

Name: GLOBAL RELAY

Business Address: 220 CAMBIE STREET

2ND FLOOR

VANCOUVER, BRITISH COLUMBIA V6B2M9

Effective Date: 06/01/2013

Description: COMMERCE STREET UTILIZES GLOBAL RELAY TO EMPLOY

ELECTRONIC STORAGE MEDIA TO MAINTAIN AND PRESERVE RECORDS

RELATED TO ELECTRONIC COMMUNICATIONS OF ASSOCIATED

MEMBERS OF THE FIRM.

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.

COMMERCE STREET INVESTMENT MANAGEMENT is under common control with the firm.

CRD #: 144278

Business Address: 1445 ROSS AVE., STE. 2700

DALLAS, TX 75202

Effective Date: 01/17/2008

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory

Activities:

Yes

Description: COMMERCE STREET CAPITAL, LLC IS UNDER COMMON OWNERSHIP WITH

COMMERCE STREET INVESTMENT ADVISORS, LLC THROUGH OWNERSHIP

OF COMMERCE STREET HOLDINGS, 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

www.finra.org/brokercheck

End of Report



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