

BrokerCheck Report

TMT INVESTMENTS, LLC

CRD# 144491

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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.



TMT INVESTMENTS, LLC

CRD# 144491

SEC# 8-67661

Main Office Location

440 S LASALLE ST. SUITE 910 C
CHICAGO, IL 60605

Mailing Address

440 S. LASALLE, SUITE 1729
CHICAGO, IL 60605

Business Telephone Number

847-899-6612

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 Illinois on 02/13/2007.

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 brokerage firm is no longer registered with FINRA or a national securities exchange.

Disclosure Events

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

Are there events disclosed about this firm?

Yes

The following types of disclosures have been reported:

Type	Count
Regulatory Event	3



Registration Withdrawal Information

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

Date firm ceased business:	07/31/2018
Does this brokerage firm owe any money or securities to any customer or brokerage firm?	Yes
Number of customers owed funds or securities:	0
Amount of money owed to customer:	\$0.00
Amount of money owed to brokerage firm:	\$50,000.00
Market value of securities owed to customer:	\$0.00
Market value of securities owed to brokerage firm:	\$0.00
Payment arrangement:	FIRM HAS SET EXCESS CASH ASIDE TO COVER ESTIMATED COMMISSIONS PAYABLE TO EXECUTING BROKERS. ONCE BROKERAGE INVOICES ARE RECEIVED THE FIRM WILL CURE PROMPTLY.



Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Illinois on 02/13/2007.

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.

TMT INVESTMENTS, LLC

Doing business as TMT INVESTMENTS, LLC

CRD# 144491

SEC# 8-67661

Main Office Location

440 S LASALLE ST. SUITE 910 C
CHICAGO, IL 60605

Mailing Address

440 S. LASALLE, SUITE 1729
CHICAGO, IL 60605

Business Telephone Number

847-899-6612



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): PALUMBO, MICHAEL JOHN

2795112

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

Position MANAGING MEMBER

Position Start Date 02/2007

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): KAZAROSS, NEIL THOMAS

4471620

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

Position MEMBER

Position Start Date 02/2007

Percentage of Ownership 10% but less than 25%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): NANGLE, EDWARD JOHN

4728318

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

Position MEMBER

Firm Profile



Direct Owners and Executive Officers (continued)

Position Start Date	04/2018
Percentage of Ownership	5% but less than 10%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	KEILEY, EDWARD HAYES 2187781
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF COMPLIANCE FINOP/ AML OFFICER/CFO
Position Start Date	05/2007
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Firm Profile

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

Indirect Owners

No information reported.



Firm History

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

No information reported.



Firm Operations



Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is no longer registered.

The firm's registration was from 09/28/2007 to 08/31/2018.

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 2 types of businesses.

Types of Business

Put and call broker or dealer or option writer

Trading securities for own account

Other Types of Business

This firm does 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 not refer or introduce customers to other brokers and dealers.

Firm Operations

Industry Arrangements



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

Name: GLOBAL RELAY COMMUNICATIONS INC.
Business Address: 220 CAMBIE STREET, 2ND FLOOR
VANCOUVER, BC, CANADA V6B2M9
Effective Date: 12/01/2016
Description: GLOBAL RELAY PROVIDES 17A-4(F) ELECTRONIC COMMUNICATION
RETENTION AND ARCHIVING SERVICES

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

Name: GOLDMAN SACHS & CO. LLC
CRD #: 361
Business Address: 440 SOUTH LASALLE STREET
CHICAGO, IL 60605
Effective Date: 02/01/2008
Description: THE FIRM HAS ENTERED INTO A FORMAL AGREEMENT WITH GSCO TO
PERFORM ITS CLEARING AND BACK OFFICE.

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.



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.**

TMT EAST LLC is under common control with the firm.

CRD #:	104091
Business Address:	440 SOUTH LASALLE #2910 CHICAGO, IL 60605
Effective Date:	04/26/2000
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	MICHAEL PALUMBO IS A SENIOR PARTNER IN THE FIRMS AND IS LISTED ON FORM BD AS A CONTROL PERSON

This firm is not directly or indirectly, controlled by the following:

- bank holding company
- national bank
- state member bank of the Federal Reserve System
- state non-member bank
- savings bank or association
- credit union
- or foreign bank

Disclosure Events



All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	0	3	0



Disclosure Event Details

What you should know about reported disclosure events:

1. **BrokerCheck provides details for any disclosure event that was reported in CRD. It also includes summary information regarding FINRA arbitration awards in cases where the brokerage firm was named as a respondent.**
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
 - A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
4. **There are different statuses and dispositions for disclosure events:**
 - A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" event involves allegations that have not been proven or formally adjudicated.
 - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" event has been concluded and its resolution is not subject to change.
 - A final event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
5. **You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.**

Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

Disclosure 1 of 3

Reporting Source: Regulator

Current Status: Final



Allegations:	TMT INVESTMENTS, LLC ("TMT"), AN EXCHANGE TPH ORGANIZATION, WAS CENSURED AND FINED \$12,500 FOR THE FOLLOWING CONDUCT. TMT FAILED TO (I) PROPERLY QUALIFY AND REGISTER ONE ASSOCIATED PERSON AS A PROPRIETARY TRADER PRINCIPAL (TP) IN WEBCRD; (II) PROPERLY QUALIFY AND REGISTER TWO ASSOCIATED PERSONS AS PROPRIETARY TRADERS (PT) IN WEBCRD; AND (III) IMPLEMENT ADEQUATE SUPERVISORY PROCEDURES RELATED TO REGISTRATION AND QUALIFICATION TO ASSURE COMPLIANCE WITH CBOE RULE 3.6A. (EXCHANGE RULES 3.6A - AUTOMATED IMPROVEMENT MECHANISM ("AIM") AND 4.2 - ADHERENCE TO LAW)
Initiated By:	CHICAGO BOARD OPTIONS EXCHANGE
Date Initiated:	10/25/2013
Docket/Case Number:	13-0059
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	04/03/2014
Sanctions Ordered:	Censure Monetary/Fine \$12,500.00
Other Sanctions Ordered:	
Sanction Details:	A \$12,500 FINE AND A CENSURE
Reporting Source:	Firm
Current Status:	Final
Allegations:	IT IS ALLEGED THAT TMT: I)FAILED TO PROPERLY QUALIFY AND REGISTER ONE ASSOCIATED PERSON AS A PROPRIETARY TRADER PRINCIPAL (TP) IN WEBCRD BY NOVEMBER 5, 2011; II) FAILED TO PROPERLY QUALIFY AND REGISTER TWO ASSOCIATED PERSONS AS PROPRIETARY TRADERS (PT) IN WEBCRD BY NOVEMBER 5, 2011; AND III) FAILED TO IMPLEMENT ADEQUATE SUPERVISORY PROCEDURES RELATED TO REGISTRATION AND QUALIFICATION TO ASSURE COMPLIANCE WITH EXCHANGE RULE 3.6A. (VIOLATION OF EXCHANGE RULES 3.6A AND 4.2)



Initiated By: CHICAGO BOARD OF OPTIONS EXCHANGE

Date Initiated: 10/25/2013

Docket/Case Number: 13-0059

Principal Product Type: Options

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 02/12/2014

Sanctions Ordered: Censure
Monetary/Fine \$12,500.00

Other Sanctions Ordered:

Sanction Details: FINE 12,500 AND CENSURE

Firm Statement IT IS ALLEGED THAT TMT: I)FAILED TO PROPERLY QUALIFY AND REGISTER ONE ASSOCIATED PERSON AS A PROPRIETARY TRADER PRINCIPAL (TP) IN WEBCRD BY NOVEMBER 5, 2011; II) FAILED TO PROPERLY QUALIFY AND REGISTER TWO ASSOCIATED PERSONS AS PROPRIETARY TRADERS (PT) IN WEBCRD BY NOVEMBER 5, 2011; AND III) FAILED TO IMPLEMENT ADEQUATE SUPERVISORY PROCEDURES RELATED TO REGISTRATION AND QUALIFICATION TO ASSURE COMPLIANCE WITH EXCHANGE RULE 3.6A. (VIOLATION OF EXCHANGE RULES 3.6A AND 4.2).

Disclosure 2 of 3

Reporting Source: Regulator

Current Status: Final

Allegations: TMT INVESTMENTS, LLC ("TMT"), A CBOE A TPH ORGANIZATION REGISTERED, WAS CENSURED AND FINED \$10,000 FOR THE FOLLOWING CONDUCT. TMT FAILED TO REGISTER 8 OF 9 ASSOCIATED PERSONS BY JANUARY 11, 2011. (CBOE RULE 3.6A.)

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE

Date Initiated: 11/14/2011

Docket/Case Number: 11-0035



Principal Product Type: Options

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 03/07/2012

Sanctions Ordered: Censure
Monetary/Fine \$10,000.00

Other Sanctions Ordered:

Sanction Details: A \$10,000 FINE AND A CENSURE.

Reporting Source: Firm

Current Status: Final

Allegations: TMT INVESTMENTS, LLC ("TMT"), A CBOE A TPH ORGANIZATION REGISTERED, WAS CENSURED AND FINED \$10,000 FOR THE FOLLOWING CONDUCT. TMT FAILED TO REGISTER 8 OF 9 ASSOCIATED PERSONS BY JANUARY 11, 2011. (CBOE RULE 3.6A.)

Initiated By: CHICAGO BOARD OF OPTIONS EXCHANGE

Date Initiated: 11/14/2011

Docket/Case Number: 11-0035

Principal Product Type: Options

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 03/07/2012

Sanctions Ordered: Censure
Monetary/Fine \$10,000.00

**Other Sanctions Ordered:**

Sanction Details: A \$10,000 FINE AND A CENSURE.

Firm Statement TMT INVESTMENTS, LLC ("TMT"), A CBOE A TPH ORGANIZATION REGISTERED, WAS CENSURED AND FINED \$10,000 FOR THE FOLLOWING CONDUCT. TMT FAILED TO REGISTER 8 OF 9 ASSOCIATED PERSONS BY JANUARY 11, 2011 ON FINRA'S BUT WAS REGISTERED WITH THE EXCHANGE AND FINGER PRINTED. (CBOE RULE 3.6A.)

Disclosure 3 of 3

Reporting Source: Regulator

Current Status: Final

Allegations: TMT INVESTMENTS, LLC ("TMT") AN EXCHANGE MARKET-MAKER ORGANIZATION AND MICHAEL PALUMBO ("PALUMBO") THE MANAGING MEMBER OF TMT WERE EACH CENSURED AND JOINTLY AND SEVERALLY FINED \$100,000. IN ADDITION, THE BCC ORDERED AN UNDERTAKING BY MICHAEL PALUMBO TO ATTEND AND COMPLETE THE S201 {SUPERVISOR PROGRAM} OF THE REGULATORY ELEMENT OF THE SECURITIES INDUSTRY CONTINUING EDUCATION PROGRAM. TMT OPERATED BELOW ITS MINIMUM NET CAPITAL REQUIREMENT AND MICHAEL PALUMBO, ON VARIOUS DATES, FAILED TO ADEQUATELY ENSURE THAT TMT OPERATED ABOVE ITS NET CAPITAL REQUIREMENT. (EXCHANGE RULES 4.2 - ADHERENCE TO LAW; 13.1 - MINIMUM REQUIREMENTS; SECTION 15(C) OF THE SECURITIES EXCHANGE ACT OF 1934, AS AMENDED AND RULE 15C3-1 - NET CAPITAL THEREUNDER.)

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE

Date Initiated: 03/09/2009

Docket/Case Number: 09-0011

Principal Product Type: Options

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 05/21/2009

Sanctions Ordered: Censure



Monetary/Fine \$100,000.00

Other Sanctions Ordered:

Sanction Details:

TMT INVESTMENTS, LLC AND MICHAEL PALUMBO SHALL BE AND HEREBY ARE EACH CENSURED AND JOINTLY AND SEVERALLY FINED IN THE AMOUNT OF ONE HUNDRED THOUSAND DOLLARS (\$100,000). IN ADDITION, THE COMMITTEE HEREBY ORDERED AN UNDERTAKING BY MICHAEL PALUMBO TO ATTEND AND COMPLETE THE S201 {SUPERVISOR PROGRAM} OF THE REGULATORY ELEMENT OF THE SECURITIES INDUSTRY CONTINUING EDUCATION PROGRAM.

Reporting Source:

Firm

Current Status:

Final

Allegations:

THE FIRM OPERATED UNDER THEIR NET CAPITAL REQUIREMENTS ON FIVE SEPERATE OCCASIONS IN THE MONTH OF MAY, AUGUST, AND SEPTEMBER.

Initiated By:

CBOE

Date Initiated:

07/23/2008

Docket/Case Number:

09-0011

Principal Product Type:

Options

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution:

Decision & Order of Offer of Settlement

Resolution Date:

05/21/2009

Sanctions Ordered:

Censure
Monetary/Fine \$100,000.00

Other Sanctions Ordered:

AN UNDERTAKING OF MICHAEL PALUMBO TO ATTEND AND COMPLETE THE S201 OF THE REGULATORY ELEMENT OF THE SECURITES INDUSTRY CONTINUING EDUCATION PROGRAM.

Sanction Details:

THE FINE AMOUNT WAS 100,000.00 AND AS PAID IN THE MONTH OF MARCH 2009.

Firm Statement

THE FIRM OPERATED UNDER THEIR NET CAPITAL REQUIREMENTS ON FIVE SEPERATE OCCASIONS IN THE MONTH OF MAY, AUGUST, AND



SEPTEMBER. THE FIRM KEPT THE EXCHANGE INFORMED OF EACH VIOLATION EVENT. DURING THIS TIME THE MARKET WAS HISTORICALLY VOLITILE, THE FIRM AGREED TO THE OFFER OF SETTLEMENT AND PAID THE FINE CLOSING THE MATTER.

End of Report



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