

## BrokerCheck Report

### ETC BROKERAGE SERVICES, LLC

CRD# 145276

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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).



## ETC BROKERAGE SERVICES, LLC

CRD# 145276

SEC# 8-67719

### Main Office Location

5430 LBJ FREEWAY  
SUITE 320  
DALLAS, TX 75240  
Regulated by FINRA Dallas Office

### Mailing Address

1 EQUITY WAY  
WESTLAKE, OH 44145

### Business Telephone Number

877-403-0369

## 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 Connecticut on 05/23/2007.

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? **No**

This firm conducts 5 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? **Yes**

**The following types of disclosures have been reported:**

Type	Count
Regulatory Event	1



## Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Connecticut on 05/23/2007.

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.

### ETC BROKERAGE SERVICES, LLC

**Doing business as ETC BROKERAGE SERVICES, LLC**

**CRD#** 145276

**SEC#** 8-67719

### Main Office Location

5430 LBJ FREEWAY  
SUITE 320  
DALLAS, TX 75240

**Regulated by FINRA Dallas Office**

### Mailing Address

1 EQUITY WAY  
WESTLAKE, OH 44145

### Business Telephone Number

877-403-0369



## 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):** DESICH, JEFFREY ALAN

2771522

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

**Position** VICE PRESIDENT

**Position Start Date** 03/2012

**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?**

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**Legal Name & CRD# (if any):** DESICH, RICHARD ANTHONY JR

2634014

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

**Position** VICE PRESIDENT

**Position Start Date** 03/2012

**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?**

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**Legal Name & CRD# (if any):** ABRAMCZYK, JEFFREY

2545586

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

**Position** CFO, PFO



## Firm Profile

### Direct Owners and Executive Officers (continued)

**Position Start Date** 09/2024

**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):** AMACHER, CATHERINE COMBS  
3168184

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

**Position** CEO

**Position Start Date** 02/2024

**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):** KOSINSKI, THOMAS JAMES  
6712417

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

**Position** FINOP

**Position Start Date** 05/2025

**Percentage of Ownership** Less than 5%

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

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

## Firm Profile



### Direct Owners and Executive Officers (continued)

**Legal Name & CRD# (if any):** MOORE, JONATHAN KIEL  
2312492

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

**Position** PRESIDENT, COO

**Position Start Date** 02/2024

**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):** STRICKLAND, JASON LEE  
5013990

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

**Position** CHIEF COMPLIANCE OFFICER

**Position Start Date** 08/2023

**Percentage of Ownership** Less than 5%

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

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

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## Firm Profile

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

## Indirect Owners

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 currently registered with the SEC, 1 SRO and 52 U.S. states and territories.**

Federal Regulator	Status	Date Effective
SEC	Approved	03/19/2008

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer:    Yes

A broker-dealer and government securities broker or dealer:    No

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	03/19/2008



## Firm Operations

### Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	05/22/2012
Alaska	Approved	04/26/2012
Arizona	Approved	05/01/2012
Arkansas	Approved	06/20/2012
California	Approved	04/26/2012
Colorado	Approved	05/04/2012
Connecticut	Approved	03/27/2008
Delaware	Approved	05/14/2012
District of Columbia	Approved	05/04/2012
Florida	Approved	06/22/2012
Georgia	Approved	04/30/2012
Hawaii	Approved	06/20/2012
Idaho	Approved	04/11/2012
Illinois	Approved	05/11/2012
Indiana	Approved	05/30/2012
Iowa	Approved	04/27/2012
Kansas	Approved	05/24/2012
Kentucky	Approved	04/26/2012
Louisiana	Approved	04/16/2012
Maine	Approved	06/01/2012
Maryland	Approved	05/11/2012
Massachusetts	Approved	05/09/2012
Michigan	Approved	01/02/2009
Minnesota	Approved	04/18/2012
Mississippi	Approved	04/24/2012
Missouri	Approved	05/21/2012
Montana	Approved	05/15/2012
Nebraska	Approved	05/11/2012
Nevada	Approved	06/22/2012
New Hampshire	Approved	06/19/2012
New Jersey	Approved	06/05/2012
New Mexico	Approved	07/09/2012
New York	Approved	04/21/2008

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	05/21/2012
North Dakota	Approved	07/05/2012
Ohio	Approved	11/24/2008
Oklahoma	Approved	04/20/2012
Oregon	Approved	05/11/2012
Pennsylvania	Approved	07/30/2009
Puerto Rico	Approved	02/11/2025
Rhode Island	Approved	04/11/2012
South Carolina	Approved	05/18/2012
South Dakota	Approved	04/12/2012
Tennessee	Approved	06/29/2012
Texas	Approved	06/21/2012
Utah	Approved	04/30/2012
Vermont	Approved	05/18/2012
Virginia	Approved	05/09/2008
Washington	Approved	04/11/2012
West Virginia	Approved	05/15/2012
Wisconsin	Approved	05/04/2012
Wyoming	Approved	05/17/2012

## 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 5 types of businesses.**

#### Types of Business

Broker or dealer retailing corporate equity securities over-the-counter
Broker or dealer selling corporate debt securities
Mutual fund retailer
Municipal securities broker
Put and call broker or dealer or option writer

## **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:** OWN COMPANY, INC.  
**Business Address:** 940 SYLVAN AVENUE  
ENGLEWOOD, NJ 07632  
**Effective Date:** 06/21/2024  
**Description:** ELECTRONIC STORAGE MEDIA - THIRD PARTY WITH APPROPRIATE EXPERTISE.

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**Name:** THETA LAKE, INC.  
**Business Address:** 1221 CHAPALA STREET  
SUITE 6  
SANTA BARBARA, CA 93101  
**Effective Date:** 06/11/2024  
**Description:** ELECTRONIC STORAGE MEDIA - THIRD PARTY WITH APPROPRIATE EXPERTISE.

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**Name:** MEDIANT COMMUNICATIONS, INC.  
**Business Address:** 3 COLUMBUS CIRCLE  
SUITE 2110  
NEW YORK, NY 10019  
**Effective Date:** 03/02/2024  
**Description:** ETCB UTILIZES MEDIANT COMMUNICATIONS INC. FOR PROXY VOTING SERVICES, REORGANIZATION NOTIFICATIONS, BANKRUPTCY NOTIFICATION MATERIALS. MEDIANT ALSO GENERATES MONTHLY ACCOUNT STATEMENT AND DAILY TRADE CONFIRMATIONS FOR CLIENT ACCOUNTS, AND PROVIDES PROSPECTUS FULFILLMENT SERVICES.

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**Name:** SMARSH  
**Business Address:** 851 SW 6TH AVENUE  
SUITE 800  
PORTLAND, OR 97204  
**Effective Date:** 08/13/2012  
**Description:** ELECTRONIC STORAGE MEDIA - THIRD PARTY WITH APPROPRIATE EXPERTISE.

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**Name:** FIS

## Firm Operations



### Industry Arrangements (continued)

**Business Address:** 601 RIVERSIDE AVENUE  
JACKSONVILLE, FL 32204

**Effective Date:** 03/02/2024

**Description:** FIDELITY INFORMATION SERVICES (FIS) MAINTAINS A COMPREHENSIVE PORTION OF THE FIRM'S OPERATIONAL AND CUSTOMER ACCOUNT RECORDS.

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**Name:** AXOS CLEARING LLC

**CRD #:** 117176

**Business Address:** 12990 FARNAM ST  
STE 800  
OMAHA, NE 68102

**Effective Date:** 01/07/2019

**Description:** AXOS CLEARING PROVIDES ETC BROKERAGE CLEARING AND SETTLEMENT SERVICES AND TRADING EXECUTION SERVICES.

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**Name:** AXOS CLEARING LLC

**CRD #:** 117176

**Business Address:** 9300 UNDERWOOD AVE  
OMAHA, NE 68114

**Effective Date:** 01/07/2013

**Description:** ETC BROKERAGE SERVICES LLC, IS A FULLY DISCLOSED BROKER/DEALER CLEARING THROUGH AXOS CLEARING LLC.

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

**Name:** AXOS CLEARING LLC

**CRD #:** 117176

**Business Address:** 12990 FARNAM ST  
STE 800  
OMAHA, NE 68102

**Effective Date:** 01/07/2019

**Description:** AXOS CLEARING IS THE CLEARING FIRM ON A FULLY DISCLOSED BASIS FOR ETC BROKERAGE SERVICES.

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

**Name:** CHARLES SCHWAB & CO., INC.

**Business Address:** 211 MAIN STREET

## Firm Operations



### Industry Arrangements (continued)

SAN FRANCISCO, CA 94105

**Effective Date:** 12/01/2023

**Description:** CARRIES FOR THE PURPOSE OF CLEARING TRANSACTIONS IN OPEN-ENDED INVESTMENT COMPANY SHARES (MUTUAL FUNDS) ON AN OMNIBUS BASIS ON BEHALF OF OUR CUSTOMERS.

**Name:** AXOS CLEARING LLC

**CRD #:** 117176

**Business Address:** 9300 UNDERWOOD AVE  
SUITE 400  
OMAHA, NE 68114

**Effective Date:** 01/07/2013

**Description:** ETC BROKERAGE SERVICES, LLC IS A FULLY DISCLOSED BROKER / DEALER CLEARING THROUGH AXOS CLEARING LLC

### 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.**

**EQUITY ADVISOR SOLUTIONS is under common control with the firm.**

<b>Business Address:</b>	1600 STOUT STREET STE. 850 DENVER, CO 80202
<b>Effective Date:</b>	01/01/2010
<b>Foreign Entity:</b>	No
<b>Country:</b>	
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	EQUITY ADVISOR SOLUTIONS (EAS) IS OWNED BY THE SAME OWNERSHIP PRINCIPALS AS ETC BROKERAGE SERVICES (RICHARD DESICH AND JEFFREY DESICH). EAS PROVIDES CUSTODY AND TECHNOLOGY SOLUTIONS TO RIAS. ETC BROKERAGE IS A LIMITED PURPOSE EXECUTING B/D FOR EAS, TRADING IN EQUITIES/ETFS, FIXED INCOME, AND OPTIONS.

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**EQUITY TRUST COMPANY is under common control with the firm.**

<b>Business Address:</b>	1 EQUITY WAY WESTLAKE, OH 44145
<b>Effective Date:</b>	01/01/2007
<b>Foreign Entity:</b>	No
<b>Country:</b>	
<b>Securities Activities:</b>	Yes
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	RICHARD DESICH AND JEFFREY DESICH ARE BENEFICIAL OWNERS AND

## Firm Operations



### Organization Affiliates (continued)

OFFICERS OF EQUITY TRUST COMPANY.

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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	1	0



## Disclosure Event Details

### What you should know about reported disclosure events:

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

### Regulatory - Final

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

#### Disclosure 1 of 1

**Reporting Source:** Regulator

**Current Status:** Final



**Allegations:** WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT THE FIRM TRANSMITTED TO THE ORDER AUDIT TRAIL SYSTEM (OATS) 955 REPORTS THAT CONTAINED INACCURATE, INCOMPLETE, OR IMPROPERLY FORMATTED DATA. THE FINDINGS STATED THAT SPECIFICALLY, 907 OF THE REPORTS CONTAINED INCORRECT ORDER RECEIVED TIMESTAMPS, 41 CONTAINED INCORRECT CANCEL STAMPS, AND SEVEN REPORTS CONTAINED BOTH INCORRECT ORDER RECEIVED TIMESTAMPS AND REPLACED ORDER RECEIVED DATES. THE FINDINGS ALSO STATED THAT THE FIRM'S SUPERVISORY SYSTEM DID NOT PROVIDE FOR SUPERVISION REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RESPECT TO THE APPLICABLE SECURITIES LAWS AND REGULATIONS, AND THE RULES OF FINRA, CONCERNING OATS REPORTING. AT MINIMUM ADEQUATE WRITTEN SUPERVISORY PROCEDURES (WSPS) ADDRESSING QUALITY OF MARKETS TOPICS SHOULD DESCRIBE THE SPECIFIC IDENTIFICATION OF THE INDIVIDUAL(S) RESPONSIBLE FOR SUPERVISION, THE SUPERVISORY STEPS AND REVIEWS TO BE TAKEN BY THE APPROPRIATE SUPERVISOR, THE FREQUENCY OF SUCH REVIEWS, AND HOW SUCH REVIEWS SHALL BE DOCUMENTED. THE FIRM'S OATS REPORTING WSPS DID NOT PROVIDE FOR ANY OF THE FOUR CITED MINIMUM REQUIREMENTS FOR ADEQUATE WSPS. IN ADDITION, AFTER THE REVIEW PERIOD, THE FIRM CREATED AND IMPLEMENTED OATS REPORTING WSPS. HOWEVER, THOSE WSPS WERE STILL DEFICIENT.

**Initiated By:** FINRA

**Date Initiated:** 12/11/2017

**Docket/Case Number:** [2016050409801](#)

**Principal Product Type:** No Product

**Other Product Type(s):**

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

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

**Resolution:** Acceptance, Waiver & Consent(AWC)

**Resolution Date:** 12/11/2017

**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?** No



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

**Other Sanctions Ordered:** UNDERTAKING

**Sanction Details:** THE FIRM WAS CENSURED, FINED \$10,000 AND REQUIRED TO REVISE ITS WSPS.

**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** DURING REVIEW PERIOD FIRM TRANSMITTED TO OATS 955 REPORTS THAT CONTAINED INACCURATE, INCOMPLETE, OR IMPROPERLY FORMATTED DATA. SPECIFICALLY, 907 OF THE REPORTS CONTAINED INCORRECT ORDER RECEIVED TIMESTAMPS, 41 CONTAINED INCORRECT CANCEL TIMESTAMPS, AND 7 REPORTS CONTAINED BOTH INCORRECT ORDER RECEIVED TIMESTAMPS AND REPLACED ORDER RECEIVED DATES. THE CONDUCT DESCRIBED IN THIS PARAGRAPH CONSTITUTEWS SEPARATE AND DISTINCT VIOLATIONS OF FINRA RULE 7450(A). DURING THE REVIEW PERIOD, THE FIRMS WRITTEN SUPERVISORY SYSTEM DID NOT PROVIDE FOR SUPERVISION REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RESPECT TO APPLICABLE SECURITIES LAWS AND REGULATIONS, AND THE RULES OF FINRA, CONCERNING OATS REPORTING. AT MINIMUM ADEQUATE WRITTEN SUPERVISORY PROCEDURES ("WSPS") ADDRESSING QUALITY OF MARKET TOPICS SHOULD DESCRIBE THE FOLLOWING:

- A. SPECIFIC IDENTIFICATION OF THE INDIVIDUAL(S) RESPONSIBLE FOR SUPERVISION;
- B. THE SUPERVISORY STEPS AND REVIEWS TAKEN BY THE APPROPRIATE SUPERVISOR;
- C. THE FREQUENCY OF SUCH REVIEWS; AND
- D. HOW SUCH REVIEWS SHALL BE DOCUMENTED.

THE FIRMS OATS REPORTING WSPS DID NOT PROVIDE FOR ANY OF THE FOUR CITED MINIMUM REQUIREMENTS FOR ADEQUATE WSPS. THE CONDUCT DESCRIBED IN THIS PARAGRAPH CONSTITUTES VIOLATIONS OF FINRA RULES 3110 AND 2010.

**Initiated By:** FINANCIAL INDUSTRY REGULATORY AUTHORITY (FINRA).

**Date Initiated:** 12/11/2017

**Docket/Case Number:** 20160504098-01

**Principal Product Type:** Other

**Other Product Type(s):** TRADE REPORTING THROUGH OATS.



<b>Principal Sanction(s)/Relief Sought:</b>	Civil and Administrative Penalt(ies) /Fine(s)
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Resolution Date:</b>	12/11/2017
<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$10,000.00
<b>Other Sanctions Ordered:</b>	NONE.
<b>Sanction Details:</b>	\$10,000.00 PAID 12/20/2017
<b>Firm Statement</b>	WRITTEN SUPERVISORY PROCEDURES UPDATED.

**End of Report**



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