

BrokerCheck Report

SOUZA BARROS SECURITIES, INC

CRD# 149032

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Registration and Withdrawal	2
Firm Profile	3 - 7
Firm History	8
Firm Operations	9 - 13
Disclosure Events	14



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.



SOUZA BARROS SECURITIES, INC

CRD# 149032

SEC# 8-68097

Main Office Location

1221 BRICKELL AVENUE, SUITE 1120
MIAMI, FL 33131

Mailing Address

1221 BRICKELL AVENUE, SUITE 1120
MIAMI, FL 33131

Business Telephone Number

305 967-7900

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 corporation.

This firm was formed in Florida on 04/11/2008.

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	2



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: 05/16/2016

Does this brokerage firm owe any money or securities to any customer or brokerage firm? No



Firm Profile

This firm is classified as a corporation.

This firm was formed in Florida on 04/11/2008.

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.

SOUZA BARROS SECURITIES, INC.

Doing business as SOUZA BARROS SECURITIES, INC

CRD# 149032

SEC# 8-68097

Main Office Location

1221 BRICKELL AVENUE, SUITE 1120
MIAMI, FL 33131

Mailing Address

1221 BRICKELL AVENUE, SUITE 1120
MIAMI, FL 33131

Business Telephone Number

305 967-7900



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): THE GIANT HOLDING INTERNATIONAL LTD.

Is this a domestic or foreign entity or an individual? Foreign Entity

Position OWNER

Position Start Date 04/2008

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): BIKELIS, RAIKO

5624438

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

Position CEO CCO

Position Start Date 02/2011

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): DRUTAU, MAYA ARTEMOVNA

4580500

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

Position CFO & FINOP

Position Start Date 08/2014

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
-------------------------------------	----



Firm Profile

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

Indirect Owners

Legal Name & CRD# (if any):	DE SOUZA BARROS, MARCOS 5555694
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	THE GIANT HOLDING INTERNATIONAL LTD.
Relationship to Direct Owner	DIRECTOR / OWNER
Relationship Established	04/2008
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
<hr/>	
Legal Name & CRD# (if any):	DE SOUZA BARROS, CARLOS ALBERTO BOTELHO 5555706
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	THE GIANT HOLDING INTERNATIONAL LTD.
Relationship to Direct Owner	DIRECTOR
Relationship Established	04/2008
Percentage of Ownership	Other General Partners
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any): DE SOUZA BARROS, MARIANA BOTELHO

Firm Profile



Indirect Owners (continued)

	5555717
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	THE GIANT HOLDING INTERNATIONAL LTD
Relationship to Direct Owner	DIRECTOR
Relationship Established	04/2008
Percentage of Ownership	Other General Partners
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.

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 04/14/2009 to 07/15/2016.



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 6 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
U S. government securities broker
Put and call broker or dealer or option writer
Other - THE FIRM ANTICIPATES ACTING IN THE CAPACITY OF BROKER RETAILING FOREIGN SOVEREIGN DEBT AND STRUCTURED NOTES. THE FIRM ALSO ANTICIPATE,SOLICITING THE SALE OF INTEREST IN CERTAIN HEDGE FUNDS.

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.

Name:	PERSHING LLC
CRD #:	7560
Business Address:	ONE PERSHING PLAZA JERSEY CITY, NJ 07399
Effective Date:	05/13/2008
Description:	THE FIRM WILL OPERATE PURSUANT TO A FULLY DISCLOSED CLEARING AGREEMENT WITH PERSHING, LLC. THE FIRM MAY ESTABLISH FIRM SECURITIES ACCOUNTS WITH PERSHING, LLC.

Firm Operations

Industry Arrangements



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

Name: PERSHING LLC
CRD #: 7560
Business Address: ONE PERSHING PLAZA
JERSEY CITY, NJ 07399
Effective Date: 05/13/2008
Description: THE FIRM WILL OPERATE PURSUANT TO A FULLY DISCLOSED
CLEARING AGREEMENT WITH PERSHING, LLC. THE FIRM MAY
ESTABLISH FIRM SECURITIES ACCTS WITH PERSHING, LLC.

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

Name: PERSHING LLC
CRD #: 7560
Business Address: ONE PERSHING PLAZA
JERSEY CITY, NJ 07399
Effective Date: 05/13/2008
Description: THE FIRM WILL OPERATE PURSUANT TO A FULLY DISCLOSED
CLEARING AGREEMENT WITH PERSHING, LLC. THE FIRM MAY
ESTABLISH FIRM SECURITIES ACCTS WITH PERSHING,LLC.

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

Name: PERSHING LLC
CRD #: 7560
Business Address: ONE PERSHING PLAZA
JERSEY CITY, NJ 07399
Effective Date: 05/13/2008
Description: THE FIRM WILL OPERATE PURSUANT TO A FULLY DISCLOSED
CLEARING AGREEMENT WITH PERSHING, LLC. THE FIRM MAY
ESTABLISH FIRM SECURITIES ACCTS WITH PERSHING,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 not, 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.**

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: 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 IMPLEMENT AN ADEQUATE ANTI-MONEY LAUNDERING (AML) PROGRAM DESIGNED TO DETECT AND REPORT SUSPICIOUS TRANSACTIONS AS REQUIRED UNDER THE BANK SECRECY ACT AND ITS IMPLEMENTING REGULATIONS. SOME OF THE FIRM'S FOREIGN INSTITUTIONAL CUSTOMERS ENGAGED IN ACTIVITY- INCLUDING HIGH-TURNOVER SECURITIES TRADING AND HIGH-VOLUME CASH MOVEMENT-THAT THE FIRM SHOULD HAVE INVESTIGATED AND, IF APPROPRIATE, REPORTED AS SUSPICIOUS ACTIVITY. OTHERS ENGAGED IN INTRA-DAY BOND TRADING AND TRADING OF U.S.-DOLLAR DENOMINATED FOREIGN BONDS. DESPITE THE POTENTIAL MONEY LAUNDERING RISK PRESENTED BY THESE TRANSACTIONS, THE FIRM FAILED TO ADEQUATELY INVESTIGATE THE ACTIVITY TO DETERMINE WHETHER IT WAS CONSISTENT WITH LEGITIMATE BUSINESS PURPOSES. WHEN THE FIRM WAS ALERTED TO POTENTIALLY SUSPICIOUS ACTIVITY, THE FIRM LACKED ADEQUATE PROCEDURES TO REVIEW THE ACTIVITY TO DETERMINE WHETHER OR NOT IT SHOULD BE REPORTED. THE FINDINGS STATED THAT THE FIRM FAILED TO MAINTAIN AND PRESERVE THE ELECTRONIC CORRESPONDENCE OF A REGISTERED FOREIGN ASSOCIATE WHO COMMUNICATED WITH FIRM CUSTOMERS, INCLUDING FOR BUSINESS PURPOSES, USING HIS PERSONAL EMAIL ADDRESS.
Initiated By:	FINRA
Date Initiated:	02/04/2015
Docket/Case Number:	2012033169201
Principal Product Type:	Other
Other Product Type(s):	UNSPECIFIED SECURITIES; UNSPECIFIED BOND; AND U.S.-DOLLAR DENOMINATED FOREIGN BONDS.
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	N/A
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	02/04/2015
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 \$75,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$75,000.

Reporting Source: Firm

Current Status: Final

Allegations: FROM APPROXIMATELY AUGUST 2009 THROUGH JULY 2013 (THE "RELEVANT PERIOD"), SBS FAILED TO IMPLEMENT AN ADEQUATE ANTI-MONEY LAUNDERING ("AML") PROGRAM DESIGNED TO DETECT AND REPORT SUSPICIOUS TRANSACTIONS AS REQUIRED UNDER THE BANK SECRECY ACT (THE "BSA") AND ITS IMPLEMENTING REGULATIONS. DURING THE RELEVANT PERIOD, SBS CONDUCTED SECURITIES TRANSACTIONS ON BEHALF OF NUMEROUS INSTITUTIONAL CUSTOMERS LOCATED OUTSIDE OF THE UNITED STATES, INCLUDING SOME LOCATED IN KNOWN TAX HAVENS. TRANSACTIONS CONDUCTED ON BEHALF OF THESE FOREIGN INSTITUTIONAL CUSTOMERS CONSTITUTED A SIGNIFICANT PART OF SBS'S BUSINESS AND A MAJORITY OF THE FINN'S REVENUE. SOME OF SBS'S FOREIGN INSTITUTIONAL CUSTOMERS ENGAGED IN ACTIVITY- INCLUDING HIGH-TURNOVER SECURITIES TRADING AND HIGH-VOLUME CASH MOVEMENT-THAT THE FIRM SHOULD HAVE INVESTIGATED AND, IF APPROPRIATE, REPORTED AS SUSPICIOUS ACTIVITY. DURING THE RELEVANT PERIOD, SBS LACKED ADEQUATE SYSTEMS AND PROCEDURES TO DETECT AND INVESTIGATE POTENTIALLY SUSPICIOUS TRANSACTIONS TO DETERMINE WHETHER TO REPORT SUCH ACTIVITY. AS A RESULT, SBS VIOLATED NASD RULE 3011(A) AND FINRA RULES 3311(A) AND 2010.

IN ADDITION, FROM APPROXIMATELY SEPTEMBER 2009 THROUGH OCTOBER 2011, SBS FAILED TO RETAIN ELECTRONIC CORRESPONDENCE OF A REGISTERED FOREIGN ASSOCIATE, INCLUDING CORRESPONDENCE WITH FINN CUSTOMERS. AS A RESULT, SBS VIOLATED NASD RULE 3110, FINRA RULE 2010, SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 AND SEC RULE 17A-4.

Initiated By: FINRA

Date Initiated: 01/10/2013

Docket/Case Number: [2012033169201](#)

Principal Product Type: Other

**Other Product Type(s):****Principal Sanction(s)/Relief Sought:****Other Sanction(s)/Relief Sought:****Resolution:** Acceptance, Waiver & Consent(AWC)**Resolution Date:** 02/04/2015**Sanctions Ordered:** Censure
Monetary/Fine \$75,000.00**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 CENSURED AND FINED \$75,000.**Disclosure 2 of 2****Reporting Source:** Regulator**Current Status:** Final**Allegations:** FINRA RULES 2010, 7450, NASD RULE 3010 - SOUZA BARROS SECURITIES, INC. FAILED TO TRANSMIT REPORTABLE ORDER EVENTS TO THE ORDER AUDIT TRAIL SYSTEM (OATS) ON NUMEROUS BUSINESS DAYS. THE FIRM FAILED TO PROVIDE DOCUMENTARY EVIDENCE THAT IT PERFORMED THE SUPERVISORY REVIEWS SET FORTH IN ITS WRITTEN SUPERVISORY PROCEDURES CONCERNING OATS REPORTING.**Initiated By:** FINRA**Date Initiated:** 07/18/2013**Docket/Case Number:** [2011029697601](#)**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:** 07/18/2013



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 \$12,500.00

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 CENSURED AND FINED \$12,500. 04/06/2015 FINE PAID IN FULL.

Reporting Source:

Firm

Current Status:

Final

Allegations:

FINRA RULES 2010, 7450, NASD RULE 3010 - SOUZA BARROS SECURITIES, INC. FAILED TO TRANSMIT REPORTABLE ORDER EVENTS TO THE ORDER AUDIT TRAIL SYSTEM (OATS) ON NUMEROUS BUSINESS DAYS. THE FIRM FAILED TO PROVIDE DOCUMENTARY EVIDENCE THAT IT PERFORMED THE SUPERVISORY REVIEWS SET FORTH IN ITS WRITTEN SUPERVISORY PROCEDURES CONCERNING OATS REPORTING.

Initiated By:

FINRA

Date Initiated:

07/18/2013

Docket/Case Number:

[2011029697601](#)

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:

07/18/2013

Sanctions Ordered:

Censure
Monetary/Fine \$12,500.00



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 CENSURED AND FINED \$12,500.

End of Report



This page is intentionally left blank.