

## BrokerCheck Report

# TENEO SECURITIES LLC

CRD# 151256

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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.

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**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)



## TENEO SECURITIES LLC

CRD# 151256

SEC# 8-68354

### Main Office Location

280 PARK AVENUE  
4TH FLOOR  
NEW YORK, NY 10017  
Regulated by FINRA New York Office

### Mailing Address

280 PARK AVENUE  
4TH FLOOR  
NEW YORK, NY 10017

### Business Telephone Number

(212) 886-1600

## 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 Delaware on 07/17/2009.

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
- 9 U.S. states and territories

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

This firm conducts 4 types of businesses.

This firm is not affiliated with any 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 Delaware on 07/17/2009.

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.

### TENEO SECURITIES LLC

**Doing business as TENEO SECURITIES LLC**

**CRD#** 151256

**SEC#** 8-68354

### Main Office Location

280 PARK AVENUE  
4TH FLOOR  
NEW YORK, NY 10017

**Regulated by FINRA New York Office**

### Mailing Address

280 PARK AVENUE  
4TH FLOOR  
NEW YORK, NY 10017

### Business Telephone Number

(212) 886-1600



## Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

### Direct Owners and Executive Officers

<b>Legal Name &amp; CRD# (if any):</b>	TENEO CAPITAL CORPORATION
<b>Is this a domestic or foreign entity or an individual?</b>	Foreign Entity
<b>Position</b>	SOLE MEMBER
<b>Position Start Date</b>	07/2019
<b>Percentage of Ownership</b>	75% or more
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	BOGUSLASKI, CHARLES ROBERT 4845807
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	CHIEF OFFICER
<b>Position Start Date</b>	12/2024
<b>Percentage of Ownership</b>	Less than 5%
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	HALLERAN, KRISTIN MARIE 4726430
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	CHIEF COMPLIANCE OFFICER
<b>Position Start Date</b>	07/2021

## 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

**Legal Name & CRD# (if any):** POLKOWITZ, GARY CRAIG  
2866014

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

**Position** MEMBER OF BOARD OF DIRECTORS

**Position Start Date** 03/2024

**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

**Legal Name & CRD# (if any):** ROTHENBERG, SHARI P  
6590875

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

**Position** FINOP/PFO/POO

**Position Start Date** 03/2023

**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

**Legal Name & CRD# (if any):** SULLIVAN, STEVEN MICHAEL

## Firm Profile



### Direct Owners and Executive Officers (continued)

5162216

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

**Position** MEMBER OF BOARD OF DIRECTORS

**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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## Firm Profile

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



### Indirect Owners

<b>Legal Name &amp; CRD# (if any):</b>	SULLIVAN, STEVEN MICHAEL 5162216
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Company through which indirect ownership is established</b>	TENEO CAPITAL CORPORATION
<b>Relationship to Direct Owner</b>	SHAREHOLDER
<b>Relationship Established</b>	04/2024
<b>Percentage of Ownership</b>	75% or more
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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## 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 9 U.S. states and territories.**

Federal Regulator	Status	Date Effective
SEC	Approved	03/16/2010

### 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	03/16/2010

## Firm Operations



### Registrations (continued)

U.S. States & Territories	Status	Date Effective
California	Approved	01/02/2026
Connecticut	Approved	06/12/2025
Florida	Approved	10/15/2019
Louisiana	Approved	10/24/2016
New Jersey	Approved	03/07/2025
New York	Approved	04/08/2010
Ohio	Approved	05/08/2025
Texas	Approved	02/08/2022
Utah	Approved	05/12/2025



## 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 4 types of businesses.**

#### Types of Business

Underwriter or selling group participant (corporate securities other than mutual funds)

Trading securities for own account

Private placements of securities

Other - THE FIRM WILL PROVIDE CONSULTING SERVICES ON MERGERS, ACQUISITIONS, DIVESTITURES AND SIMILAR TRANSACTIONS. THE FIRM WILL ALSO PROVIDE FAIRNESS OPINIONS AND VALUATIONS, AND ADVISE IN SPECIAL/INDEPENDENT COMMITTEE ASSIGNMENTS FOR BOARDS OF DIRECTORS. THE FIRM WILL ALSO REFER INSTITUTIONAL AND INDIVIDUAL INVESTORS AND INVESTMENT BANKING CLIENTS AND INVESTMENT BANKING DEALS TO OTHER BROKER-DEALERS NOT AFFILIATED WITH THE FIRM

#### 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 not refer or introduce customers to other brokers and dealers.**

## **Firm Operations**

### **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.**

## 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.

	<b>Pending</b>	<b>Final</b>	<b>On Appeal</b>
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 WHILE THE FIRM PROVIDED AN OUTSIDE CONSULTANT WITH REASONABLE PARAMETERS FOR CONDUCTING THE REVIEW OF ITS ELECTRONIC COMMUNICATIONS, FROM JUNE 2011 THROUGH SEPTEMBER 2014, IT FAILED TO ENSURE THE REVIEW WAS CONDUCTED WITHIN THOSE PARAMETERS BY TESTING THE CONSULTANT'S REVIEW OR OBTAINING DOCUMENTATION FROM THE CONSULTANT EVIDENCING THE REVIEW. THE FINDINGS STATED THAT THUS, THE FIRM FAILED TO HAVE AN AUDIT SYSTEM IN PLACE TO ENSURE THAT THE CONSULTANT WAS CONDUCTING A REVIEW OF THE FIRM'S ELECTRONIC CORRESPONDENCE. IN ADDITION, FROM AUGUST 2013 THROUGH SEPTEMBER 2014, IN CONNECTION WITH A CHANGE IN THE FIRM'S RETENTION SYSTEM, IT FAILED TO PROVIDE THE CONSULTANT WITH ACCESS TO ITS ELECTRONIC COMMUNICATIONS FOR REVIEW. AS A RESULT, THE FIRM FAILED TO ENSURE THAT ANY CONTEMPORANEOUS REVIEW OF ELECTRONIC COMMUNICATIONS WAS CONDUCTED DURING THIS TIME PERIOD. THE FINDINGS ALSO STATED THAT IN AUGUST 2013, THE FIRM CHANGED ITS ELECTRONIC STORAGE MEDIA PROVIDER, AND IN OCTOBER 2014, CHANGED ITS ELECTRONIC STORAGE MEDIA AGAIN. HOWEVER, THE FIRM FAILED TO PROVIDE FINRA WITH NOTICE OF THESE CHANGES IN ELECTRONIC STORAGE MEDIA UNTIL NOVEMBER 2015. BASED ON THE FOREGOING, THE FIRM FAILED TO COMPLY WITH THE REQUIREMENTS OF RULE 17A-4(F)(2)(I) UNDER THE SECURITIES EXCHANGE ACT OF 1934, AND FINRA RULES 4511 AND 2010.

**Initiated By:** FINRA

**Date Initiated:** 09/07/2016

**Docket/Case Number:** [2015043373201](#)

**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:** 09/07/2016



**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 \$17,500.00

**Other Sanctions Ordered:**

**Sanction Details:** THE FIRM WAS CENSURED AND FINED \$17,500.  
FINE PAID IN FULL ON OCTOBER 12, 2016.

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** DURING THE RELEVANT PERIOD, THE FIRM FAILED TO ENSURE THE REVIEW OF ITS ELECTRONIC COMMUNICATIONS BY ITS OUTSIDE CONSULTANT WITHIN THE PARAMETERS ESTABLISHED BY THE FIRM BY FAILING TO HAVE AN AUDIT SYSTEM IN PLACE FOR THAT PURPOSE. IN ADDITION, THE FIRM FAILED TO PROVIDE TIMELY NOTICE TO FINRA OF CHANGES TO ITS ELECTRONIC STORAGE MEDIA PROVIDER.

**Initiated By:** FINRA

**Date Initiated:** 01/20/2016

**Docket/Case Number:** [2015043373201](#)

**Principal Product Type:** Other

**Other Product Type(s):**

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

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

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

**Resolution Date:** 09/07/2016

**Sanctions Ordered:** Censure  
Monetary/Fine \$17,500.00

**Other Sanctions Ordered:**



**Sanction Details:**

A MONETARY FINE OF \$17,500 IS PAYABLE BY TENEO SECURITIES LLC.

**Firm Statement**

FINRA HAS CITED THE FIRM FOR HISTORICAL ISSUES IN ITS MANAGEMENT OF ITS OUTSIDE CONSULTANT'S ELECTRONIC COMMUNICATIONS REVIEW UNTIL OCTOBER 2014, AT WHICH POINT THE FIRM, AS A RESULT OF ITS OWN EFFORTS AND PRIOR TO ANY CONTACT BY FINRA, RECOGNIZED THE ISSUES AND BEGAN REMEDIATION. THE FIRM HAS IMPLEMENTED SYSTEMS AND PROCEDURES TO ENSURE THAT THE ISSUES CANNOT OCCUR AGAIN. THE REGULATORY ACTION HAS BEEN RESOLVED AND AN ACCEPTANCE, WAIVER AND CONSENT, TOGETHER WITH A STATEMENT OF CORRECTIVE ACTION, HAS BEEN AGREED AND APPROVED.

**End of Report**



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