

**BrokerCheck Report**

**GLOBAL ARENA CAPITAL CORP**

CRD# 16871

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## 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:

- o information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
- o information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

**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)

**GLOBAL ARENA CAPITAL CORP**

CRD# 16871

SEC# 8-34661

**Main Office Location**

880 THIRD AVENUE  
SUITE 1214  
NEW YORK, NY 10022

**Mailing Address**

880 THRD AVENUE  
1214  
NEW YORK, NY 10022

**Business Telephone Number**

646 795 6725

**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 New York on 06/17/1985.

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	4
Arbitration	1
Financial	1

## 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.



**This firm terminated or  
withdrew registration on:** 06/05/2015

**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 New York on 06/17/1985.

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.

### GLOBAL ARENA CAPITAL CORP

Doing business as GLOBAL ARENA CAPITAL CORP

**CRD#** 16871

**SEC#** 8-34661

### Main Office Location

880 THIRD AVENUE  
SUITE 1214  
NEW YORK, NY 10022

### Mailing Address

880 THRD AVENUE  
1214  
NEW YORK, NY 10022

### Business Telephone Number

646 795 6725



## 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>	GLOBAL ARENA HOLDING INC.
<b>Is this a domestic or foreign entity or an individual?</b>	Domestic Entity
<b>Position</b>	OWNER
<b>Position Start Date</b>	07/2012
<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>	Yes

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<b>Legal Name &amp; CRD# (if any):</b>	PMC CAPITAL LLC
<b>Is this a domestic or foreign entity or an individual?</b>	Domestic Entity
<b>Position</b>	OWNER
<b>Position Start Date</b>	08/2014
<b>Percentage of Ownership</b>	10% but less than 25%
<b>Does this owner direct the management or policies of the firm?</b>	No
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	BRUNO, VINCENT MICHAEL 1845833
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	CHIEF COMPLIANCE OFFICER
<b>Position Start Date</b>	05/2015
<b>Percentage of Ownership</b>	Less than 5%



## Firm Profile

### Direct Owners and Executive Officers (continued)

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

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

**Legal Name & CRD# (if any):** DESIDERIO, BARBARA LUCILLE  
2080713

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

**Position** FINOP

**Position Start Date** 08/2014

**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):** DESIDERIO, BARBARA LUCILLE  
2080713

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

**Position** NONE

**Position Start Date** 08/2014

**Percentage of Ownership** Less than 5%

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

**Is this a public reporting company?**



## 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>	DESIDERIO, BARBARA LUCILLE 2080713
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Company through which indirect ownership is established</b>	PMC CAPITAL LLC
<b>Relationship to Direct Owner</b>	MANAGING MEMBER
<b>Relationship Established</b>	12/2013
<b>Percentage of Ownership</b>	Other General Partners
<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 no longer registered.**

**The firm's registration was from 02/12/1986 to 01/04/2016.**



## 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 10 types of businesses.**

#### Types of Business

Broker or dealer retailing corporate equity securities over-the-counter
Broker or dealer selling corporate debt securities
Underwriter or selling group participant (corporate securities other than mutual funds)
Mutual fund retailer
U S. government securities broker
Municipal securities dealer
Broker or dealer selling variable life insurance or annuities
Put and call broker or dealer or option writer
Non-exchange member arranging for transactions in listed securities by exchange member
Private placements of securities

## 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.

<b>Name:</b>	RBC CAPITAL MARKETS, LLC
<b>CRD #:</b>	31194
<b>Business Address:</b>	50 SOUTH SIXTH STREET MINNEAPOLIS, MN 55402
<b>Effective Date:</b>	05/01/2008
<b>Description:</b>	RBC ACTS AS OUR CLEARING FIRM AND CARRIES THE CASH AND MARGIN FOR OUR ACCOUNTS. RBC ALSO CLEARS FOR US ON A FULLY DISCLOSED BASIS.

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## Firm Operations

### Industry Arrangements



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

**Name:** RBC CAPITAL MARKETS, LLC  
**CRD #:** 31194  
**Business Address:** 50 SOUTH SIXTH STREET  
MINNEAPOLIS, MN 55402  
**Effective Date:** 05/01/2008  
**Description:** THE FIRM HAS A FULLY DISCLOSED CLEARING AGREEMENT WITH RBC

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

**Name:** RBC CAPITAL MARKETS, LLC  
**CRD #:** 31194  
**Business Address:** 50 SOUTH SIXTH STREET  
MINNEAPOLIS, MN 55402  
**Effective Date:** 05/01/2008  
**Description:** THE FIRM HAS A FULLY DISCLOSED CLEARING AGREEMENT WITH RBC

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

**Name:** RBC CAPITAL MARKETS, LLC  
**CRD #:** 31194  
**Business Address:** 50 SOUTH SIXTH STREET  
MINNEAPOLIS, MN 55402  
**Effective Date:** 05/01/2008  
**Description:** THE FIRM HAS A FULLY DISCLOSED CLEARING AGREEMENT WITH RBC

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### 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.

**GLOBAL ARENA COMMODITIES TRADING CORP is under common control with the firm.**

<b>Business Address:</b>	708 THIRD AVENUE 11TH FLOOR NEW YORK, NY 10017
<b>Effective Date:</b>	11/13/2009
<b>Foreign Entity:</b>	No
<b>Country:</b>	
<b>Securities Activities:</b>	No
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	COMMON OFFICERS AND/OR DIRECTORS, GLOBAL ARENA COMMODITIES TRADING CORP IS MAJORITY OWNED BY GLOBAL ARENA HOLDING INC MANAGEMENT IS CONTROLLED BY OWNERS AND OFFICERS/DIRECTORS OF GLOBAL ARENA CAPITAL CORP

**GLOBAL ARENA COMMODITIES CORP is under common control with the firm.**

<b>Business Address:</b>	708 THIRD AVENUE 11TH FLOOR NEW YORK, NY 10017
<b>Effective Date:</b>	10/15/2009
<b>Foreign Entity:</b>	No
<b>Country:</b>	
<b>Securities Activities:</b>	No
<b>Investment Advisory Activities:</b>	No
<b>Description:</b>	COMMON OFFICERS AND/OR DIRECTORS, GLOBAL ARENA COMMODITIES

## Firm Operations



### Organization Affiliates (continued)

CORPIS MAJORITY OWNED BY GLOBAL ARENA HOLDING INC. WHOSE MANAGEMENT IS CONTROLLED BY OWNERS AND OFFICERS/DIRECTORS OF GLOBAL ARENA CAPITAL CORP

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**GLOBAL ARENA INVESTMENT MANAGEMENT, LLC is under common control with the firm.**

**CRD #:** 135835

**Business Address:** 708 THIRD AVENUE  
11TH FLOOR  
NEW YORK, NY 10017

**Effective Date:** 07/02/2009

**Foreign Entity:** No

**Country:**

**Securities Activities:** No

**Investment Advisory Activities:** Yes

**Description:** COMMON OFFICERS AND/OR DIRECTORS, GLOBAL ARENA INVESTMENT MANAGEMENT LLC IS MAJORITY OWNED BY GLOBAL ARENA HOLDING SUBSIDIARY CORP WHOSE MANAGEMENT IS CONTROLLED BY OWNERS AND OFFICERS/DIRECTORS OF GLOBAL ARENA CAPITAL CORP

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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.

	<b>Pending</b>	<b>Final</b>	<b>On Appeal</b>
Regulatory Event	0	4	0
Arbitration	N/A	1	N/A
Financial	0	1	N/A





## 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:**
  - o 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:**
  - o 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:**
  - o 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.
  - o 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 4

**Reporting Source:** Regulator  
**Current Status:** Final



<b>Allegations:</b>	RESPONDENT GLOBAL ARENA CAPITAL CORP FAILED TO PAY FEES OF \$49,075.06 DUE TO FINRA.
<b>Initiated By:</b>	FINRA
<b>Date Initiated:</b>	06/08/2015
<b>Docket/Case Number:</b>	N/A
<b>Principal Product Type:</b>	No Product
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Other
<b>Other Sanction(s)/Relief Sought:</b>	CANCELLATION
<b>Resolution:</b>	Other
<b>Resolution Date:</b>	07/20/2015
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Sanctions Ordered:</b>	
<b>Other Sanctions Ordered:</b>	CANCELLATION
<b>Sanction Details:</b>	PURSUANT TO FINRA RULE 9553, GLOBAL ARENA CAPITAL CORP 'S MEMBERSHIP WITH FINRA IS CANCELED AS OF JULY 20, 2015 FOR FAILURE TO PAY OUTSTANDING FEES.

#### Disclosure 2 of 4

<b>Reporting Source:</b>	Regulator
<b>Current Status:</b>	Final
<b>Allegations:</b>	RESPONDENTS ENGAGED IN DECEPTIVE AND MISLEADING SALES TACTICS WITH AN ELDERLY INVESTOR. RESPONDENTS DIRECTED JUNIOR AGENTS TO COLD CALL AN ELDERLY INVESTOR AND OTHER POTENTIAL CLIENTS AND TO MAKE DECEPTIVE AND MISLEADING REPRESENTATIONS REGARDING CERTAIN BONDS, PITCHING THEM AS SAFE INVESTMENTS AND PROMISING HIGH RATES OF RETURN, WHEN IN REALITY THE BONDS WERE JUNK BONDS RATED AS ONE STEP ABOVE DEFAULT STATUS BY BOND RATING AGENCIES. RESPONDENTS ALSO SENT ADDITIONAL



OFFERS TO THE ELDERLY INVESTOR TO PURCHASE OTHER JUNK BONDS WITHOUT ANY CONSIDERATION FOR THE INVESTOR'S OBJECTIVES OR RISK TOLERANCE.

**Initiated By:** ALASKA

**Date Initiated:** 07/21/2014

**Docket/Case Number:** 2014-001442

**URL for Regulatory Action:** [HTTPS://WWW.COMMERCE.ALASKA.GOV/WEB/PORTALS/3/PUB/ENFORCEMENTACTIONS/14-1442-S\\_FINAL\\_CEASE\\_AND\\_DESIST\\_ORDER.PDF](https://www.commerce.alaska.gov/web/portals/3/pub/enforcementactions/14-1442-s_final_cease_and_desist_order.pdf)

**Principal Product Type:** Debt - Corporate

**Other Product Type(s):** DEBT-MUNICIPAL

**Principal Sanction(s)/Relief Sought:** Cease and Desist

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

**Resolution:** Order

**Resolution Date:** 07/30/2015

**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?** Yes

**Sanctions Ordered:** Monetary/Fine \$150,000.00  
Cease and Desist/Injunction

**Other Sanctions Ordered:**

**Sanction Details:** RESPONDENTS ARE JOINTLY AND SEVERALLY LIABLE FOR COMPLYING WITH THE TERMS OF THIS ORDER INCLUDING PAYMENT OF THE CIVIL PENALTY.

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**Reporting Source:** Firm

**Current Status:** Pending

**Allegations:** DECEPTIVE AND MISLEADING SALES TACTICS WITH AN ELDERLY INVESTOR

**Initiated By:** ALASKA



**Date Initiated:** 07/21/2014  
**Docket/Case Number:** 2014-001442  
**Principal Product Type:** Debt - Corporate  
**Other Product Type(s):**  
**Principal Sanction(s)/Relief Sought:** Civil and Administrative Penalt(ies) /Fine(s)  
**Other Sanction(s)/Relief Sought:**

#### Disclosure 3 of 4

**Reporting Source:** Regulator

**Current Status:** Final

**Allegations:** THE FIRM WAS NAMED A RESPONDENT IN A FINRA COMPLAINT ALLEGING THAT THE FIRM ENGAGED IN A PATTERN OF CHARGING EXCESSIVE AND UNFAIR MARKUPS/MARKDOWNS TO ITS CUSTOMERS ON CORPORATE BOND TRANSACTIONS, WHICH RESULTED IN EXCESSIVE MARKUP/MARKDOWN CHARGES OF APPROXIMATELY \$333,083.26. THE COMPLAINT ALLEGES THAT BY ENGAGING IN SUCH MISCONDUCT, THE FIRM FAILED TO COMPLY WITH ITS OBLIGATIONS UNDER APPLICABLE FINRA RULES TO BUY OR SELL SECURITIES, I.E., CORPORATE BONDS, AT A PRICE WHICH WAS FAIR, TAKING INTO CONSIDERATION ALL RELEVANT CIRCUMSTANCES, INCLUDING MARKET CONDITIONS, WITH RESPECT TO SUCH SECURITIES. THE COMPLAINT ALSO ALLEGES THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES (WSPS), WHICH WAS REASONABLY DESIGNED TO ENSURE THAT THE FIRM DID NOT CHARGE EXCESSIVE AND UNFAIR MARKUPS/MARKDOWNS TO ITS CUSTOMERS, AND FAILED TO REASONABLY SUPERVISE THE MARKUPS/MARKDOWNS THAT THE FIRM CHARGED TO ITS CUSTOMERS ON CORPORATE BONDS.

**Initiated By:** FINRA

**Date Initiated:** 06/04/2015

**Docket/Case Number:** [2011026544301](#)

**Principal Product Type:** Debt - Corporate

**Other Product Type(s):**

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



<b>Other Sanction(s)/Relief Sought:</b>	N/A
<b>Resolution:</b>	Decision
<b>Resolution Date:</b>	01/04/2016
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Sanctions Ordered:</b>	Monetary/Fine \$1,000,000.00 Disgorgement/Restitution Revocation/Expulsion/Denial
<b>Other Sanctions Ordered:</b>	INTEREST
<b>Sanction Details:</b>	THE FIRM IS EXPELLED FROM FINRA MEMBERSHIP, FINED \$1 MILLION AND ORDERED TO DISGORGE \$333,083.26, PLUS INTEREST.
<b>Regulator Statement</b>	DEFAULT DECISION RENDERED DECEMBER 7, 2015. THE SANCTIONS WERE BASED ON FINDINGS THAT THE FIRM CHARGED CUSTOMERS UNFAIR AND UNREASONABLE PRICES AND EXCESSIVE MARKUPS. THE FINDINGS STATED THAT THE FIRM BOUGHT AND SOLD CORPORATE BONDS FROM OTHER BROKER-DEALERS TO SELL TO ITS RETAIL CUSTOMERS, CHARGING THEM MARKUPS ON THE BONDS. THE FIRM ALSO BOUGHT BONDS FROM ITS RETAIL CUSTOMERS AND SOLD THEM TO OTHER BROKER-DEALERS, CHARGING THE CUSTOMERS MARKDOWNS. THE TRANSACTIONS AT ISSUE WERE RISKLESS PRINCIPAL TRANSACTIONS, INVOLVING PURCHASES AND SALES OF THE SAME BONDS ON THE SAME DAY WITH FIRM CUSTOMERS ON ONE OR BOTH SIDES OF THE TRANSACTIONS. TAKING INTO CONSIDERATION ALL RELEVANT CIRCUMSTANCES, THESE CHARGES WERE NOT FAIR AND NOT REASONABLY RELATED TO THE THEN-CURRENT MARKET PRICE OF THE SECURITY, AND THE PREVAILING MARKET PRICE WAS NOT DETERMINED WITH REFERENCE TO THE CONTEMPORANEOUS COST INCURRED, OR THE PROCEEDS OBTAINED. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN AND ENFORCE A SUPERVISORY SYSTEM, INCLUDING WSPS, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS, AND FINRA AND NASD RULES, REGARDING FAIR PRICING OF CORPORATE BOND TRANSACTIONS AND MARKUPS AND MARKDOWNS. THE FIRM'S WRITTEN PROCEDURES DID NOT CONTAIN REASONABLE MEASURES TO GUIDE THE FIRM'S REGISTERED REPRESENTATIVES TO CONFORM THEIR PRACTICES IN PRICING BONDS AND SETTING MARKUPS AND MARKDOWNS TO THE



REQUIREMENTS SET FORTH IN THE FACTORS PRESCRIBED BY NASD INTERPRETATIVE MATERIAL-2440-1. AS A RESULT, FIRM SUPERVISORS DID NOT TAKE THEM INTO CONSIDERATION WHEN REVIEWING THE FIRM'S BOND TRANSACTIONS. THE DECISION BECAME FINAL ON JANUARY 4, 2016.

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**Reporting Source:** Firm  
**Current Status:** Pending  
**Allegations:** EXCESSIVE AND UNFAIR MARK-UPS AND MARK DOWNS  
**Initiated By:** FNRA  
**Date Initiated:** 06/04/2015  
**Docket/Case Number:** [2011026544301](#)  
**Principal Product Type:** Debt - Corporate  
**Other Product Type(s):**  
**Principal Sanction(s)/Relief Sought:**  
**Other Sanction(s)/Relief Sought:**

#### Disclosure 4 of 4

**Reporting Source:** Regulator  
**Current Status:** Final  
**Allegations:** SECURITIES EXCHANGE ACT RULES 17A-4(B), 17A-4(F), NASD BY-LAWS ARTICLE V, SECTIONS 2 AND 3, FINRA RULES 2010, 3130, NASD RULES 2110, 3012, 3013, 3070 - GLOBAL ARENA CAPITAL CORP. EXPERIENCED A TECHNICAL FAILURE THAT IMPACTED THE COMPUTERS OF TWO REGISTERED REPRESENTATIVE AS WELL AS THE FIRM'S BACK-UP SERVER. DURING AN EXAMINATION, FINRA REQUESTED EMAIL COMMUNICATIONS INVOLVING THE TWO REPRESENTATIVES, AMONG OTHER THINGS, BUT THE FIRM WAS UNABLE TO PROVIDE THE EMAIL COMMUNICATIONS UNTIL A LATER DATE. AS A RESULT, THE FIRM FAILED TO RETAIN IN AN EASILY ACCESSIBLE PLACE INCOMING OR OUTGOING EMAILS FOR THE REPRESENTATIVES DURING CERTAIN PERIODS. THE FIRM FAILED TO REPORT, OR REPORTED LATE, SOME CUSTOMER COMPLAINTS. THE FIRM WAS AWARE OF A FEW OF THESE THROUGH FLAGS GENERATED BY TERM-BASED AUTOMATIC REVIEWS OF EMAIL SYSTEMS OR THROUGH RANDOM EMAIL REVIEW. DURING TWO YEARS,



THE FIRM FAILED TO TIMELY UPDATE ITS FORM U4 AND U5 FILINGS TO DISCLOSE REPORTABLE EVENTS. DURING TWO YEARS, THE FIRM'S SUPERVISORY CONTROLS FAILED TO SPECIFY PROCEDURES WITH RESPECT TO EVIDENCING ITS REVIEW IDENTIFYING PRODUCING MANAGERS SUBJECTED TO HEIGHTENED SECURITY; AND NOTIFYING FINRA OF ITS RELIANCE ON THE LIMITED SIZE AND RESOURCE EXCEPTION. THE FIRM FAILED TO IMPLEMENT ITS SUPERVISORY CONTROLS WITH RESPECT TO ONE YEAR'S CEO CERTIFICATION, WHICH FAILED TO CONTAIN CERTAIN LANGUAGE REQUIRED IN INTERPRETATIVE MATERIAL 3013; ITS SUPERVISORY CONTROL REPORTS FOR TWO YEARS, WHICH FAILED TO DETAIL ADEQUATELY HOW IT TESTED ITS SUPERVISORY POLICIES AND PROCEDURES; FILING NOTICE OF ITS RELIANCE ON THE LIMITED SIZE AND RESOURCE EXCEPTION; AND EVIDENCING ITS COMMUNICATIONS WITH CUSTOMERS TO CONFIRM THIRD-PARTY CHECKS AND WIRES.

**Initiated By:** FINRA

**Date Initiated:** 07/31/2013

**Docket/Case Number:** [2009016141101](#)

**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:** 07/31/2013

**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 \$30,000.00

**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 \$30,000. FINE PAID ON



AUGUST 13, 2013.

**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** FAILURE TO COMPLY WITH SEC RULES 17A-4(B) AND 17A-4(F) REGARDING RETENTION OF EMAILS IN A EASILY ACCESSIBLE PLACE; FAILURE TO COMPLY WITH NASD CONDUCT RULE 3070 REGARDING LATE REPORTING OF 5 CUSTOMER COMPLAINTS RECEIVED BY EMAIL; FAILURE TO COMPLY WITH NASD BY-LAWS ART. V, SEC. 2 & 3 REGARDING FAILURE TO TIMELY UPDATE U4S/5S FOR 5 REGISTERED REPRESENTATIVES; FAILURE TO COMPLY WITH NASD RULE 3012 REGARDING A) PROCEDURES FOR SUPERVISING PRODUCING MANAGERS SUBJECTED TO HEIGHTENED SCRUTINY AND INFORMING FINRA OF "LIMITED SIZE AND RESOURCE EXCEPTION" AND B) IMPLEMENTATION OF SUPERVISORY CONTROLS WITH REGARD TO ITS 2008 CEO CERTIFICATION, 2008-2009 SUPERVISORY CONTROL REPORTS, "LIMITED SIZE AND RESOURCE EXCEPTION" FILING AND COMMUNICATIONS WITH CUSTOMERS CONFIRMING THIRD-PARTY WIRES AND CHECKS

**Initiated By:** FINRA

**Date Initiated:** 07/31/2013

**Docket/Case Number:** [2009016141101](#)

**Principal Product Type:** No Product

**Other Product Type(s):**

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

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

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

**Resolution Date:** 07/31/2013

**Sanctions Ordered:** Censure  
Monetary/Fine \$30,000.00

**Other Sanctions Ordered:**

**Sanction Details:** \$30,000.00



## Arbitration Award - Award / Judgment

Brokerage firms are not required to report arbitration claims filed against them by customers; however, BrokerCheck provides summary information regarding FINRA arbitration awards involving securities and commodities disputes between public customers and registered securities firms in this section of the report.

The full text of arbitration awards issued by FINRA is available at [www.finra.org/awardsonline](http://www.finra.org/awardsonline).

### Disclosure 1 of 1

<b>Reporting Source:</b>	Regulator
<b>Type of Event:</b>	ARBITRATION
<b>Allegations:</b>	ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT ACTIVITY-UNAUTHORIZED TRADING; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE; EMPLOYMENT-BREACH OF CONTRACT
<b>Arbitration Forum:</b>	FINRA
<b>Case Initiated:</b>	04/15/2015
<b>Case Number:</b>	<a href="#">15-00742</a>
<b>Disputed Product Type:</b>	COMMON STOCK; CORPORATE BONDS
<b>Sum of All Relief Requested:</b>	\$454,119.51
<b>Disposition:</b>	AWARD AGAINST PARTY
<b>Disposition Date:</b>	02/19/2016
<b>Sum of All Relief Awarded:</b>	\$151,373.18

There may be a non-monetary award associated with this arbitration. Please select the Case Number above to view more detailed information.



## Financial - Final

This type of disclosure event involves a final bankruptcy or Securities Investor Protection Corporation liquidation filed within the last 10 years.

### Disclosure 1 of 1

<b>Reporting Source:</b>	Regulator
<b>Action Pending?</b>	No
<b>Financial Event:</b>	Liquidated
<b>Date Initiated:</b>	01/28/2016
<b>Court Details:</b>	<p>THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK; NEW YORK; 1:16-CV-00620.</p> <p>THE LIQUIDATION OF GLOBAL ARENA CAPITAL CORP. IS PENDING IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK; CASE NUMBER 16-01030.</p>
<b>Disposition:</b>	SIPA Trustee Appointed
<b>Disposition Date:</b>	02/16/2016
<b>Summary of Events:</b>	<p>ON JANUARY 28, 2016, THE SECURITIES INVESTOR PROTECTION CORPORATION (SIPC) FILED AN APPLICATION SEEKING AN ORDER PLACING GLOBAL ARENA CAPITAL CORP. (GLOBAL ARENA), A BROKERAGE FIRM LOCATED IN NEW YORK CITY, IN LIQUIDATION UNDER THE SECURITIES INVESTOR PROTECTION ACT (SIPA). ON FEBRUARY 16, 2016, THE ORDER OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK WAS DOCKETED, PLACING GLOBAL ARENA IN LIQUIDATION AND APPOINTING SIPC AS TRUSTEE.</p>
<b>Details regarding SIPA trustee appointment or direct payment procedures:</b>	
<b>Currently Open?</b>	Yes
<b>Date Direct Payment Initiated/Filed or Trustee Appointed:</b>	
<b>Regulator Statement</b>	<p>GLOBAL ARENA CEASED DOING BUSINESS IN 2015, BUT SOME CUSTOMERS OF THE FIRM HAVE NOT RECEIVED THE ASSETS IN THEIR ACCOUNTS. UNDER SIPA, THE CASE WILL BE REMOVED TO THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK.</p> <p>CLAIM FORMS WILL BE SENT TO CUSTOMERS AND CREDITORS OF THE</p>



FIRM AS SOON AS MAILING LISTS CAN BE COMPILED AND CLAIM FORMS PRINTED. SIPC RECEIVED INFORMATION FROM THE FINANCIAL INDUSTRY REGULATORY AUTHORITY (FINRA) THAT PROMPTED THE APPLICATION.

## End of Report



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