

BrokerCheck Report

TULLETT & TOKYO SECURITIES, INC.

CRD# 19595

Section Title	Page(s)
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. <u>Imposters</u> might link to sites like BrokerCheck from <u>phishing</u> or similar scam websites, or through <u>social media</u>, 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
 - 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



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.

www.finra.org/brokercheck
User Guidance

TULLETT & TOKYO SECURITIES, INC.

CRD# 19595

SEC# 8-37648

Main Office Location

80 PINE STREET NEW YORK, NY 10005-1770

Mailing Address

80 PINE STREET NEW YORK, NY 10005-1770

Business Telephone Number

212 208-2000

Report Summary for this Firm



Yes

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 02/02/1987. 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?

The following types of disclosures have been reported:

Туре	Count	
Regulatory Event	1	
Arbitration	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.



Date firm ceased business: 07/31/2000

Does this brokerage firm owe any money or securities to any customer or brokerage firm?

This firm is classified as a corporation.

This firm was formed in New York on 02/02/1987.

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.

TULLETT & TOKYO SECURITIES, INC.

Doing business as TULLETT & TOKYO SECURITIES, INC.

CRD# 19595

SEC# 8-37648

Main Office Location

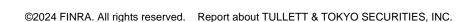
80 PINE STREET NEW YORK, NY 10005-1770

Mailing Address

80 PINE STREET NEW YORK, NY 10005-1770

Business Telephone Number

212 208-2000



3



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): **TULLETT & TOKYO INC.**

Is this a domestic or foreign entity or an individual?

Domestic Entity

Position STOCKHOLDER

Position Start Date 02/1987

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):

BAKER, STEPHEN GREGORY

1350348

Is this a domestic or foreign entity or an individual?

Individual

PRESIDENT

Position Start Date

11/1999

Percentage of Ownership

Less than 5%

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

Yes

Is this a public reporting

No

company?

Position

GROZIER, TIMOTHY Legal Name & CRD# (if any):

Is this a domestic or foreign entity or an individual?

Individual

Position GENERAL SECURITIES PRINCIPAL

Position Start Date 06/1999

Percentage of Ownership Less than 5%

User Guidance

Direct Owners and Executive Officers (continued)

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

Yes

Is this a public reporting company?

No

Legal Name & CRD# (if any):

MACRINA, MARIO

Is this a domestic or foreign entity or an individual?

Individual

Position

EXECUTIVE VICE PRESIDENT/COMPLIANCE OFFICER/COMPLIANCE REG

OPTIONS PRINCIPAL

Position Start Date

10/1991

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):

RAYANO, VINCENT GERARD

1693402

Is this a domestic or foreign entity or an individual?

Individual

Position

FINANCIAL OPERATIONS OFFICER

Position Start Date

11/1999

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

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



Indirect Owners

Legal Name & CRD# (if any): TULLETT & TOKYO BV

Is this a domestic or foreign entity or an individual?

Foreign Entity

Company through which indirect ownership is established

TULLETT & TOKYO INC.

Relationship to Direct Owner

STOCKHOLDER

Relationship Established

08/1991

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):

TULLETT & TOKYO PLC

Is this a domestic or foreign entity or an individual?

Foreign Entity

Company through which indirect ownership is

established

TULLETT & TOKYO BV

Relationship to Direct Owner

STOCKHOLDER

Relationship Established

05/1972

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):

TOKYO FOREX CO. LTD.

Is this a domestic or foreign entity or an individual?

Foreign Entity

Indirect Owners (continued)

Company through which indirect ownership is

established

TULLETT & TOKYO PLC

Relationship to Direct Owner STOCKHOLDER

Relationship Established

07/1983

Percentage of Ownership

25% but less than 50%

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.

FINCA

No information reported.

Registrations

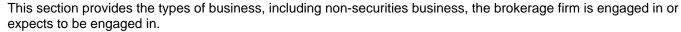
FINCA

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 07/25/1987 to 08/31/2000.

Types of Business



This firm currently conducts 6 types of businesses.

Types of Business

Broker or dealer retailing corporate equity securities over-the-counter

U S. government securities broker

Municipal securities dealer

Municipal securities broker

Put and call broker or dealer or option writer

Other - 10Y THE PURCHASE AND SALE, AS A BROKER, OF: COLLATERALIZED MORTGAGE OBLIGATIONS AND REAL ESTATE MORTGAGE INVESTMENT CONDUITS. REPURCHASE AND REVERSE REPURCHASE AGREEMENTS. BROKERING OF SOVEREIGN DEBT. 10T THE PURCHASE AND SALE OF, AS A BROKER: COLLATERALIZED MORTGAGE OBLIGATIONS, AND REAL ESTATE MORTGAGE INVESTMENT CONDUITS. THE BROKERING OF REPURCHASE AGREEMENTS OF U.S. GOVERNMENT AND AGENCY SECURITIES.

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:





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.

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.

Organization Affiliates

FINCA

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	1	0
Arbitration	N/A	1	N/A



Disclosure Event Details

What you should know about reported disclosure events:

- 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:
 - 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 1

Reporting Source: Regulator

Current Status: Final



Allegations: 07/26/99GK: ON JULY 20, 1999, DISTRICT NO. 4 NOTIFIED

RESPONDENTS TULLETT & TOKYO SECURITIES, INC. AND JAMES M. AVENA THAT THE LETTER OF AWC NO. C04990030 WAS ACCEPTED; THEREFORE, THEY ARE CENSURED AND FINED \$20,000, JOINTLY AND SEVERALLY, AND RESPONDENT MEMBER IS REQUIRED TO UNDERTAKE TO PAY THE NASD \$130,000, WHICH REPRESENTS A PORTION OF THE FINANCIAL BENEFIT THE FIRM DERIVED BY ALLOWING THE REGISTERED REPRESENTATIVES

CONDUCT A SECURITIES BUSINESS WHILE THEIR REGISTRATIONS WERE INACTIVE, WHICH AMOUNT IS PAYABLE AS FOLLOWS: \$65,000 UPON NOTIFICATION OF FINAL ACCEPTANCE OF THE LETTER OF AWC, AND \$65,000 THREE MONTHS FROM THE DATE OF FINAL ACCEPTANCE OF THE LETTER OF AWC - (NASD RULE 2110 AND MEMBERSHIP AND

REGISTRATION

RULE 1120 - RESPONDENT MEMBER, ACTING THROUGH RESPONDENT

AVENA,

PERMITTED REGISTERED REPRESENTATIVES TO CONDUCT A SECURITIES

BUSINESS WHILE THEIR REGISTRATIONS WERE INACTIVE DUE TO

FAILURE

TO SATISFY THE REGULATORY ELEMENT OF THE CONTINUING EDUCATION

REQUIREMENTS).

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

 Date Initiated:
 07/20/1999

 Docket/Case Number:
 C04990030

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: 07/20/1999

Sanctions Ordered: Censure

Monetary/Fine \$20,000.00

Other Sanctions Ordered:

Sanction Details: FINED

Regulator Statement 01-11-00, \$20,000 PAID J&S ON 9/10/99, INVOICE #99-04-678



01-11-00, \$130,000 PAID IN FULL ON 10/14/99, INVOICE #99-04-669

Reporting Source: Firm

Current Status: Final

Allegations: THE COMPANY ACCEPTED AND CONSENTED, WITHOUT ADMITTING OR

DENYING THE ALLEGATIONS MADE BY NASD REGULATION INC., THAT AT VARIOUS TIMES BETWEEN APRIL 1997 AND MAY 1998, TULLETT & TOKYO

SECURITIES ACTING THROUGH ITS PRESIDENT (JAMES AVENA), PERMITTED NINE REGISTERED REPRESENTATIVES TO CONDUCT A

SECURITIES BUSINESS WHILE THEIR REISTRATIONS WERE INACTIVE DUE TO FAILURE TO SATISFY THE REGULATORY ELEMENT OF THE CONTINUING EDUCATION REQUIREMENTS. SUCH ACTS, PRACTICES AND CONDUCT

CONSTITUTE SEPARATE AND DISTINCT VIOLATIONS OF NASD

MEMBERSHIP AND REGISTRATION RULE 1120 AND NASD CONDUCT RULE

2110.

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS

Date Initiated: 05/12/1999

Docket/Case Number:

Principal Product Type: Debt - Government

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 05/12/1999

Sanctions Ordered: Censure

Monetary/Fine \$150,000.00

Other Sanctions Ordered:

Sanction Details: DISPOSITION RESULTED IN A TOTAL FINE OF \$150,000, WHICH WAS PAID

DURING THE PERIOD AUGUST, 1999 - OCTOBER, 1999.



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.

Disclosure 1 of 1

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-OTHER; ACCOUNT RELATED-BREACH OF CONTRACT;

NO OTHER CONTROVERSY INVOLVED

Arbitration Forum: NASD

Case Initiated: 12/20/1994

Case Number: 94-04575

Disputed Product Type: NO OTHER TYPE OF SEC INVOLVE; MUNICIPAL BOND FUNDS

Sum of All Relief Requested: \$1,800,000.02

Disposition: AWARD AGAINST PARTY

Disposition Date: 03/25/1996

Sum of All Relief Awarded: \$2,331,743.78

There may be a non-monetary award associated with this arbitration.

Please select the Case Number above to view more detailed information.

www.finra.org/brokercheck

End of Report



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