

BrokerCheck Report

MOMENTIX CAPITAL, INC.

CRD# 20130

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Firm Profile	2 - 5
Firm History	6
Firm Operations	7 - 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:
 - 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



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.



MOMENTIX CAPITAL, INC.
CRD# 20130
SEC# 8-38086

Main Office Location
1 BETHANY ROAD
SUITE 36
HAZLET, NJ 07730
Regulated by FINRA Woodbridge Office

Mailing Address
1 BETHANY ROAD
SUITE 36
HAZLET, NJ 07730

Business Telephone Number
7185546677

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 06/05/1987.
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 firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 8 U.S. states and territories

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

This firm conducts 5 types of businesses.
This firm is affiliated with financial or investment institutions.
This firm has 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	5



Firm Profile

This firm is classified as a corporation.

This firm was formed in New York on 06/05/1987.

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.

MOMENTIX CAPITAL, INC.

Doing business as MOMENTIX CAPITAL, INC.

CRD# 20130

SEC# 8-38086

Main Office Location

1 BETHANY ROAD
SUITE 36
HAZLET, NJ 07730

Regulated by FINRA Woodbridge Office

Mailing Address

1 BETHANY ROAD
SUITE 36
HAZLET, NJ 07730

Business Telephone Number

7185546677



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):	BDM PARTNERS LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MAJOR SHAREHOLDER
Position Start Date	07/2019
Percentage of Ownership	50% but less than 75%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	LOONEY, TIMOTHY ANDREW 2727098
Is this a domestic or foreign entity or an individual?	Individual
Position	FINOP
Position Start Date	12/2021
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):	MANDERSON, CRAIG MICHAEL 2738654
Is this a domestic or foreign entity or an individual?	Individual
Position	CEO
Position Start Date	07/2022

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?	Yes
Is this a public reporting company?	
Legal Name & CRD# (if any):	SMITH, JEFFREY SCOTT 2492551
Is this a domestic or foreign entity or an individual?	Individual
Position	CCO
Position Start Date	09/2024
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Firm Profile

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

Indirect Owners

No information reported.



Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

No information reported.





Firm Operations

Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is currently registered with the SEC, 1 SRO and 8 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	07/31/1987

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	08/24/1987

Firm Operations



Registrations (continued)

U.S. States & Territories	Status	Date Effective
California	Approved	01/24/1995
Florida	Approved	01/09/2017
Indiana	Termination Requested	11/15/2022
New Jersey	Approved	03/02/1994
New York	Approved	07/01/1987
Oklahoma	Approved	08/07/2007
Pennsylvania	Approved	03/25/2014
Texas	Approved	05/10/2017

Firm Operations



Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

This firm currently conducts 5 types of businesses.

Types of Business

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

Mutual fund retailer

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



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:	VELOCITY CLEARING, LLC
CRD #:	126588
Business Address:	1301 ROUTE 36 SUITE 109 HAZLET, NJ 07730
Effective Date:	12/01/2022
Description:	ON FULLY DISCLOSED VELOCITY CLEARINT WILL EXECUTE OUR ORDERS AND PROCESS CUSTOMERS' STATEMENTS.

Name:	AXOS CLEARING LLC
CRD #:	117176
Business Address:	1200 LANDMARK CENTER SUITE 800 OMAHA, NE 68102-1916
Effective Date:	12/14/2013
Description:	ON FULLY DISCLOSED ARRANGEMENT, AXOS CLEARING WILL EXECUTE OUR ORDERS AND PROCESS CUSTOMERS' STATEMENTS.

Firm Operations

Industry Arrangements



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

Name: AXOS CLEARING LLC
CRD #: 117176
Business Address: 1200 LANDMARK CENTER SUITE 800
OMAHA, NE 68102-1916
Effective Date: 12/14/2013
Description: ON FULLY DISCLOSED ARRANGEMENT, AXOS CLEARING WILL EXECUTE OUR ORDERS AND PROCESS CUSTOMERS' STATEMENTS.

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

Name: AXOS CLEARING LLC
CRD #: 117176
Business Address: 1200 LANDMARK CENTER SUITE 800
OMAHA, NE 68102-1916
Effective Date: 12/14/2013
Description: ON FULLY DISCLOSED ARRANGEMENT, AXOS CLEARING WILL EXECUTE OUR ORDERS AND PROCESS CUSTOMERS' STATEMENTS.

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

Name: AXOS CLEARING LLC
CRD #: 117176
Business Address: 1200 LANDMARK CENTER SUITE 800
OMAHA, NE 68102-1916
Effective Date: 12/14/2013
Description: ON FULLY DISCLOSED ARRANGEMENT, AXOS CLEARING WILL EXECUTE OUR ORDERS AND PROCESS CUSTOMERS' STATEMENTS.

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.**

VELOCITY CAPITAL, LLC is under common control with the firm.

CRD #:	171810
Business Address:	199 WATER STREET 8TH FLOOR NEW YORK, NY 10038
Effective Date:	10/29/2024
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	UNDER COMMON CONTROL.

GOLD STREET CAPITAL, LLC is under common control with the firm.

CRD #:	282643
Business Address:	199 WATER STREET 8TH FLOOR NEW YORK, NY 10038
Effective Date:	12/22/2022
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	UNDER COMMON CONTROL.

Firm Operations



Organization Affiliates (continued)

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	5	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:**
 - 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 5

Reporting Source: Regulator

Current Status: Final



Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM AND DIVITA CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT THEY FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE A SUPERVISORY SYSTEM, INCLUDING WSPS, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RULES GOVERNING REGISTERED REPRESENTATIVES PROPOSED OBAS. THE FINDINGS STATED THAT THE FIRM AND DIVITA KNEW THAT TWO OF THE FIRM'S REPRESENTATIVES WERE ENGAGED IN OUTSIDE ACTIVITIES THAT INVOLVED INVESTMENT FUNDS AND PRIVATE PLACEMENT OFFERINGS, BUT NEITHER THE FIRM NOR DIVITA EVALUATED THE ACTIVITIES TO DETERMINE WHETHER THEY CONSTITUTED OUTSIDE SECURITIES ACTIVITIES. THE REPRESENTATIVES OWNED AND RECEIVED A FEE FOR MANAGING INVESTMENT FUNDS THAT RAISED \$60 MILLION FROM OVER 200 INDIVIDUAL INVESTORS. THE REPRESENTATIVES PRESENTED THE INVESTMENT FUNDS TO THE FIRM AND DIVITA IN DISCUSSIONS AND EMAILS AS OBAS, SO THEY UNDERSTOOD THAT THE REPRESENTATIVE'S OBAS WERE INVESTMENT-RELATED. HOWEVER, NEITHER DIVITA NOR ANYONE ELSE AT THE FIRM EVALUATED THE REPRESENTATIVE'S PROPOSED ACTIVITIES TO DETERMINE WHETHER THEY SHOULD BE RESTRICTED OR PROHIBITED; WHETHER THEY SHOULD HAVE BEEN TREATED AS OUTSIDE SECURITIES ACTIVITIES, WITH ANY TRANSACTIONS RECORDED ON THE FIRM'S BOOKS AND RECORDS; AND WHETHER THEY WOULD INTERFERE WITH OR OTHERWISE COMPROMISE THE REPRESENTATIVES' RESPONSIBILITIES TO THE FIRM OR THE FIRM'S CUSTOMERS, OR BE VIEWED AS PART OF THE FIRM'S BUSINESS. IN ADDITION, THE FIRM'S WSPS DID NOT REFERENCE OR OTHERWISE REQUIRE THE FIRM TO COMPLY WITH THE REQUIREMENTS OF FINRA RULE 3270.01 OR THE FACTORS LISTED THERE.

Initiated By: FINRA

Date Initiated: 09/05/2023

Docket/Case Number: [2019062264901](#)

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: N/A

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 09/05/2023



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: UNDERTAKINGS

Sanction Details: THE FIRM WAS CENSURED, FINED \$75,000, JOINTLY AND SEVERALLY, AND REQUIRED TO REMEDIATE THE ISSUES IDENTIFIED IN THE AWC AND IMPLEMENT A SUPERVISORY SYSTEM, INCLUDING WSPS, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH FINRA RULE 3270.01.

Reporting Source: Firm

Current Status: Final

Allegations: THE FIRM AND MR. DIVITA CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS IT FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RULES GOVERNING REGISTERED REPRESENTATIVES PROPOSED OUTSIDE BUSINESS ACTIVITIES. TWO OF THE FIRM'S REGISTERED REPRESENTATIVES WERE ENGAGED IN OUTSIDE ACTIVITIES THAT INVOLVED INVESTMENT FUNDS AND PRIVATE PLACEMENT OFFERINGS, BUT NEITHER THE FIRM NOR MR. DIVITA EVALUATED THE SECURITIES ACTIVITIES TO DETERMINE WHETHER THEY CONSTITUTED OUTSIDE SECURITIES ACTIVITIES. THE FIRM'S WRITTEN SUPERVISORY PROCEDURES DID NOT REFERENCE OR OTHERWISE REQUIRE THE FIRM TO COMPLY WITH THE REQUIREMENTS OF FINRA RULE 3270.01 OR OTHER FACTORS LISTED THERE.

Initiated By: FINRA

Date Initiated: 09/05/2023

Docket/Case Number: [2019062264901](#)

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other



Other Sanction(s)/Relief Sought:

Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	09/05/2023
Sanctions Ordered:	Censure Monetary/Fine \$75,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	THE FIRM WAS CENSURED, FINED \$75,000, JOINTLY AND SEVERALLY, AND REQUIRED TO REMEDIATE THE ISSUES IDENTIFIED IN THE AWC AND IMPLEMENT A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RULE 3270.01.

Disclosure 2 of 5

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 ESTABLISH, MAINTAIN, AND ENFORCE A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES (WSPS), REASONABLY DESIGNED TO IDENTIFY AND PREVENT EXCESSIVE TRADING. THE WSPS LISTED DESIGNATED SUPERVISORS FOR CERTAIN REPRESENTATIVES AT THE FIRM BUT DID NOT LIST A DESIGNATED SUPERVISOR FOR ALL REPRESENTATIVES. THE WSPS TASKED SUPERVISORS WITH REVIEWING TRADE BLOTTERS, ACCOUNT STATEMENTS, EXCEPTION REPORTS, AND COMMISSION REPORTS TO MONITOR FOR EXCESSIVE TRADING, BUT DID NOT EXPLAIN HOW TO IDENTIFY SUCH TRADING OR HOW SUPERVISORS SHOULD RESPOND TO SUCH TRADING. ADDITIONALLY, THE FIRM'S SUPERVISORS DID NOT REVIEW EXCEPTION REPORTS, AS REQUIRED BY THE WSPS, IN THE EXERCISE OF THEIR SUPERVISORY OBLIGATIONS. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO REASONABLY SUPERVISE A REGISTERED REPRESENTATIVE WHO RECOMMENDED EXCESSIVE TRADING IN CUSTOMER ACCOUNTS. THE FIRM'S WSPS DID NOT DESIGNATE A SUPERVISOR FOR THE BROKER, AND NO SUPERVISOR WAS REVIEWING THE BROKER'S TRADING ACTIVITY FOR EXCESSIVE TRADING UNTIL A FINANCIAL AND OPERATIONS PRINCIPAL AT THE FIRM BEGAN DIRECTLY SUPERVISING THE BROKER. HOWEVER, HE DID NOT TAKE REASONABLE STEPS TO MONITOR FOR EXCESSIVE TRADING IN THE BROKER'S CUSTOMER ACCOUNTS. THE FIRM'S FAILURE TO SUPERVISE



THE BROKER PERMITTED HIS EXCESSIVE TRADING IN CUSTOMER ACCOUNTS TO CONTINUE. AS A RESULT, CUSTOMERS WERE CHARGED A TOTAL OF \$451,057 IN COMMISSIONS AND INCURRED A TOTAL OF \$538,057 IN LOSSES. THE FINDINGS ALSO INCLUDED THAT THE FIRM FAILED TO REPORT TO FINRA STATISTICAL AND SUMMARY INFORMATION RELATED TO CUSTOMER COMPLAINTS ABOUT THE BROKER'S TRADING ACTIVITY IN ACCOUNTS THAT WERE EXCESSIVELY TRADED. THE COMPLAINTS PERTAINED TO COMMISSIONS CHARGED, ACCOUNT LOSSES, AND ALLEGED UNAUTHORIZED TRADING.

Initiated By: FINRA

Date Initiated: 11/24/2021

Docket/Case Number: [2018059045003](#)

Principal Product Type: Other

Other Product Type(s): UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 11/24/2021

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
Disgorgement/Restitution

Other Sanctions Ordered: UNDERTAKING

Sanction Details: THE FIRM WAS CENSURED, ORDERED TO PAY \$300,000 IN PARTIAL RESTITUTION TO CUSTOMERS, AND REQUIRED TO REVISE ITS WSPS. FINRA IMPOSED NO FINE AFTER IT CONSIDERED, AMONG OTHER THINGS, THE FIRM'S REVENUES AND FINANCIAL RESOURCES.

Reporting Source: Firm

Current Status: Final



Allegations:	FINRA ALLEGES THAT THERE WAS EXCESSIVE TRADING IN CLIENTS' ACCOUNTS.
Initiated By:	FINRA
Date Initiated:	11/29/2021
Docket/Case Number:	2018059045003
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Restitution
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	11/29/2021
Sanctions Ordered:	Censure Monetary/Fine \$300,000.00 Disgorgement/Restitution Suspension
Other Sanctions Ordered:	RESTITUTION WAS PAID TO CLIENTS
Sanction Details:	RESTITUTION WAS PAID TO CLIENTS. THE PAYMENTS TO CLIENTS WENT OUT ON OR ABOUT DECEMBER 10, 2021. THE FIRM WILL REVISE WSP'S TO ADDRESS THE FINDINGS IN THIS MATTER
Firm Statement	N/A

Disclosure 3 of 5

Reporting Source:	Regulator
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTION AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO HAVE A SYSTEM OF SUPERVISORY CONTROL PROCEDURES THAT TEST AND VERIFY THAT ITS SUPERVISORY PROCEDURES WERE REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS AND REGULATIONS AND FINRA RULES. THE FINDINGS STATED THAT THE FIRM FAILED TO PROPERLY COMPLETE ANNUAL CERTIFICATIONS OF ITS COMPLIANCE AND SUPERVISORY PROCESSES.
Initiated By:	FINRA



Date Initiated:	07/09/2019
Docket/Case Number:	2017052485801
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:	07/09/2019
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:	Monetary/Fine \$5,000.00
Other Sanctions Ordered:	
Sanction Details:	THE FIRM WAS FINED \$5,000. FINES PAID IN FULL ON AUGUST 6, 2019.
Reporting Source:	Firm
Current Status:	Final
Allegations:	FOR CALENDER YEARS 2014 2015 2016, TRADERFIELD FAILED TO HAVE A SYSTEM OF SUPERVISORY CONTROL PROCEDURES, WHICH TEST AND VERIFY THAT ITS SUPERVISORY PROCEDURES WERE CONTROL PROCEDURES WERE REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS AND REGULATION AND FINRA RULES
Initiated By:	FINRA
Date Initiated:	07/09/2019
Docket/Case Number:	2017052485801
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: 07/09/2019

Sanctions Ordered: Monetary/Fine \$5,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS \$5000.00 ON A PAYMENT MENT PLAN

Firm Statement THIS HAPPENED IN 2014 2015 2016 CURRENT MANAGEMENT WAS NOT IN PLACE WHEN THIS OCCURRED.

CURRENT MANAGEMENT IS UPDATE TO DATE WITH ALL ITS REPORTS AND FILINGS.

Disclosure 4 of 5

Reporting Source: Regulator

Current Status: Final

Allegations: NASD CONDUCT RULES 3011 AND 2110; TRADERFIELD FAILED TO DEVELOP AND IMPLEMENT AN ANTI-MONEY LAUNDERING PROGRAM REASONABLY DESIGNED TO ACHIEVE AND MONITOR ITS COMPLIANCE WITH THE REQUIREMENTS OF THE BANK SECRECY ACT AND THE IMPLEMENTING REGULATIONS PROMULGATED THEREUNDER BY THE DEPARTMENT OF THE TREASURY.

Initiated By: NASD

Date Initiated: 09/29/2005

Docket/Case Number: E102004041001

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: 09/29/2005

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: Monetary/Fine \$5,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RESPONDENT MEMBER CONSENTED TO THE DESCRIBED SANCTION AND TO THE ENTRY OF FINDINGS; THEREFORE FIRM IS FINED \$5,000.

Reporting Source: Firm

Current Status: Final

Allegations: TRADERFIELD SEC. INC FAILED TO DEVELOP AND IMPLEMENT AN ANTI-MONEY LAUNDERING (AML)PROGRAM REASONABLY DESIGNED TO ACHIEVE AND MONITOR IT'S COMPLIANCE.

Initiated By: NASD

Date Initiated: 09/29/2005

Docket/Case Number: E102004041001

Principal Product Type: No Product

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 09/29/2005

Sanctions Ordered: Monetary/Fine \$5,000.00

Other Sanctions Ordered:

Sanction Details: FIRM FINED 5000.00 AWAITING INSTRUCTIONS FOR NASD ON PAYMENT INFORMATION.

**Disclosure 5 of 5**

Reporting Source:	Regulator
Current Status:	Final
Allegations:	TRADERFIELD CONDUCTED SECURITIES ACTIVITY IN NEW JERSEY PRIOR TO ITS REGISTRATION IN THIS STATE. CONSENT ORDER ENTERED ASSESSING \$2500 MONETARY PENALTIES AND \$250 IN BACK REGISTRATION FEES.
Initiated By:	STATE OF NEW JERSEY BUREAU OF SECURITIES
Date Initiated:	06/26/1995
Docket/Case Number:	Unknown
URL for Regulatory Action:	
Principal Product Type:	
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	06/26/1995
Sanctions Ordered:	Monetary/Fine \$2,500.00
Other Sanctions Ordered:	
Sanction Details:	Not Provided
Regulator Statement	CONTACT: MICHAEL DOLAN 201-504-3600

Reporting Source:	Firm
Current Status:	Final
Allegations:	TRADERFIELD CONDUCTED SECURITIES ACTIVITY IN NEW JERSEY PRIOR TO ITS REGISTRATION IN THIS STATE. CONSENT ORDER ENTERED ASSESSING \$2500 MONETARY PENALTIES AND \$250 IN BACK REGISTRATION FEES.
Initiated By:	NEW JERSEY



Date Initiated: 06/26/1995

Docket/Case Number:

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 06/26/1995

Sanctions Ordered: Monetary/Fine \$2,500.00

Other Sanctions Ordered:

Sanction Details: PAID FINES

End of Report



This page is intentionally left blank.