BrokerCheck Report

VISTIA CAPITAL, LLC

CRD# 311342

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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.
-

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.

VISTIA CAPITAL, LLC

CRD# 311342

SEC# 8-70643

Main Office Location

9380 STATION STREET, SUITE 225
LONE TREE, CO 80124
Regulated by FINRA Denver Office

Mailing Address

9380 STATION STREET SUITE 225
LONE TREE, CO 80124

Business Telephone Number

720-738-1742

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 07/13/2020.

Its fiscal year ends in June.

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
- 51 U.S. states and territories

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

This firm conducts 1 type of business.

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	2

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Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Delaware on 07/13/2020.

Its fiscal year ends in June.

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.

VISTIA CAPITAL, LLC

Doing business as VISTIA CAPITAL, LLC

CRD# 311342

SEC# 8-70643

Main Office Location

9380 STATION STREET, SUITE 225
LONE TREE, CO 80124

Regulated by FINRA Denver Office

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LONE TREE, CO 80124

Business Telephone Number

720-738-1742

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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):	GM417 HOLDINGS, INC.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	07/2020
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	

Legal Name & CRD# (if any):	HAYES, SUSAN ANN 2856326
Is this a domestic or foreign entity or an individual?	Individual
Position	FINOP/PFO/POO/CFO
Position Start Date	12/2020
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):	MOSES, GARY LEE 7074013
Is this a domestic or foreign entity or an individual?	Individual
Position	CEO/DESIGNATED PRINCIPAL
Position Start Date	07/2020

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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?	No

Legal Name & CRD# (if any):	ROBERTS, DANIEL ANTHONY 2208120
Is this a domestic or foreign entity or an individual?	Individual
Position	CCO
Position Start Date	12/2020
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):	RODRIGUEZ DE ALMEIDA, PABLO ULISES 7155564
Is this a domestic or foreign entity or an individual?	Individual
Position	REGISTERED PRINCIPAL
Position Start Date	12/2020
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

Legal Name & CRD# (if any):	MOSES, GARY LEE 7074013
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	GM417 HOLDINGS, INC.
Relationship to Direct Owner	SOLE OWNER
Relationship Established	11/2018
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

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Firm History

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

No information reported.

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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 51 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	06/15/2021

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	06/15/2021

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Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	07/19/2021
Alaska	Approved	07/15/2021
Arizona	Approved	07/22/2021
Arkansas	Approved	07/12/2021
California	Approved	07/29/2021
Colorado	Approved	06/21/2021
Connecticut	Approved	07/09/2021
Delaware	Approved	07/28/2021
District of Columbia	Approved	07/15/2021
Florida	Approved	09/10/2021
Georgia	Approved	07/15/2021
Hawaii	Approved	10/04/2021
Idaho	Approved	07/07/2021
Illinois	Approved	11/23/2021
Indiana	Approved	08/25/2021
Iowa	Approved	07/07/2021
Kansas	Approved	07/07/2021
Kentucky	Approved	07/12/2021
Louisiana	Approved	07/12/2021
Maine	Approved	08/03/2021
Maryland	Approved	07/07/2021
Massachusetts	Approved	10/26/2021
Michigan	Approved	07/22/2021
Minnesota	Approved	09/30/2021
Mississippi	Approved	07/06/2021
Missouri	Approved	08/02/2021
Montana	Approved	07/19/2021
Nebraska	Approved	08/16/2021
Nevada	Approved	07/16/2021
New Hampshire	Approved	08/03/2021
New Jersey	Approved	08/06/2021
New Mexico	Approved	07/12/2021
New York	Approved	07/11/2021
North Carolina	Approved	07/07/2021
North Dakota	Approved	07/13/2021
Ohio	Approved	07/09/2021
Oklahoma	Approved	07/08/2021
Oregon	Approved	08/06/2021
Pennsylvania	Approved	07/08/2021
Rhode Island	Approved	07/06/2021
South Carolina	Approved	07/14/2021
South Dakota	Approved	08/19/2021
Tennessee	Approved	08/03/2021
Texas	Limited	08/03/2021
Utah	Approved	07/08/2021
Vermont	Approved	07/08/2021
Virginia	Approved	09/30/2021
Washington	Approved	07/07/2021
West Virginia	Approved	07/28/2021
Wisconsin	Approved	07/07/2021
Wyoming	Approved	07/15/2021

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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 1 type of business.

Types of Business

Private placements of securities

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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.

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Firm Operations

Industry Arrangements

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

Name: TEAMLOGIC

Business Address: 2 SWAMP ROAD
NEWTOWN, PA 18940

Effective Date: 02/01/2023

Description: CLOUD HOSTING, BACK-UP & IT SERVICES.

Name: COMPLIANCE SCIENCE, INC.

Business Address: 136 MADISON AVENUE
8TH FLOOR
NEW YORK, NY 10016

Effective Date: 11/01/2022

Description: THE FIRM UTILIZES COMPLIANCE SCIENCE "COMPLYSCI" FOR DISCLOSURES, CERTIFICATIONS/ATTESTATIONS, AND TRADE REVIEW.

Name: MICROSOFT 365

Business Address: ONE MICROSOFT WAY
REDMOND, WA 98052

Effective Date: 06/15/2021

Description: THE FIRM UTILIZES MICROSOFT 365 TO ARCHIVE AND STORE THE FIRM'S BOOKS AND RECORDS.

Name: PATRINA CORPORATION

Business Address: 45 BROADWAY
#1440
NEW YORK, NY 10006

Effective Date: 06/15/2021

Description: EMAIL ARCHIVING & REVIEW.

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.

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Firm Operations

Industry Arrangements (continued)

This firm does not have individuals who wholly or partly finance the firm's business.

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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**

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Disclosure Events

All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	0	2	0

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Disclosure Event Details

What you should know about reported disclosure events:

1. **BrokerCheck provides details for any disclosure event that was reported in CRD. It also includes summary information regarding FINRA arbitration awards in cases where the brokerage firm was named as a respondent.**
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
   - A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
3. **Disclosure events in BrokerCheck reports come from different sources:**
   - Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
4. **There are different statuses and dispositions for disclosure events:**
   - A disclosure event may have a status of *pending, on appeal,* or *final.*
     - A "pending" event involves allegations that have not been proven or formally adjudicated.
     - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
     - A "final" event has been concluded and its resolution is not subject to change.
   - A final event generally has a disposition of *adjudicated, settled* or *otherwise resolved.*
     - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
     - A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
     - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
5. **You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.**

Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

Disclosure 1 of 2

Reporting Source:	Regulator
Current Status:	Final

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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 REASONABLY DESIGNED SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES (WSPS). THE FINDINGS STATED THAT THE FIRM'S WSPS REGARDING OBAS REQUIRED A SUPERVISOR TO REVIEW DISCLOSED OBAS FOR ANY CONFLICTS OF INTEREST WITH THE FIRM'S BUSINESS. HOWEVER, THE WSPS DO NOT PROVIDE ANY GUIDANCE TO SUPERVISORS AS TO HOW TO EVALUATE WHETHER THE OBA WOULD INTERFERE WITH OR OTHERWISE COMPROMISE THE REGISTERED PERSON'S RESPONSIBILITIES TO THE FIRM OR FIRM'S CUSTOMERS, OR BE VIEWED BY CUSTOMERS OR THE PUBLIC AS PART OF THE FIRM'S BUSINESS; SHOULD BE SUBJECT TO SPECIFIC CONDITIONS OR LIMITATIONS OR PROHIBITED; OR PROPERLY IS CHARACTERIZED AS AN OBA OR WHETHER IT SHOULD BE TREATED AS AN OUTSIDE SECURITIES ACTIVITY. IN ADDITION, THE WSPS DO NOT REQUIRE THAT SUPERVISORS DOCUMENT THEIR CONSIDERATION OF THE FACTORS SET FORTH IN FINRA RULE 3270.01. FROM JUNE 2021 THROUGH AT LEAST JANUARY 2023, THE FIRM'S BUSINESS FOCUSED ON RECOMMENDING PRIVATE PLACEMENTS OF SECURITIES TO RETAIL CUSTOMERS. DURING THIS PERIOD, TWO OF THE FIRM'S REGISTERED REPRESENTATIVES DISCLOSED SEVEN OBAS, INCLUDING THREE THAT RELATED TO BUSINESS RELATIONSHIPS WITH ISSUERS OF THE FIRM'S PRIVATE PLACEMENT OFFERINGS. THE FIRM APPROVED THESE ACTIVITIES BUT FAILED TO CONSIDER WHETHER THE OBAS WOULD INTERFERE WITH OR COMPROMISE THE REPRESENTATIVES' RESPONSIBILITIES TO THE FIRM OR ITS CUSTOMERS OR BE VIEWED BY CUSTOMERS OR THE PUBLIC AS PART OF THE FIRM'S BUSINESS. THE FIRM ALSO FAILED TO DETECT OR INVESTIGATE RED FLAGS CONTAINED WITHIN THE REGISTERED REPRESENTATIVES' OBA DISCLOSURE FORMS REGARDING THE NATURE OF THEIR ACTIVITIES.
Initiated By:	FINRA
Date Initiated:	10/14/2026
Docket/Case Number:	2022075203301
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)

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Resolution Date:	10/14/2026
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 $40,000.00
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	WHICH THE FIRM WAS CENSURED, FINED $40,000, AND REQUIRED TO COMPLY WITH THE UNDERTAKING ENUMERATED IN THIS AWC. FINE PAID IN FULL ON OCTOBER 28, 2026.

Reporting Source:	Firm
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 REASONABLY DESIGNED SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES (WSPS). THE FINDINGS STATED THAT THE FIRM'S WSPS REGARDING OBAS REQUIRED A SUPERVISOR TO REVIEW DISCLOSED OBAS FOR ANY CONFLICTS OF INTEREST WITH THE FIRM'S BUSINESS. HOWEVER, THE WSPS DO NOT PROVIDE ANY GUIDANCE TO SUPERVISORS AS TO HOW TO EVALUATE WHETHER THE OBA WOULD INTERFERE WITH OR OTHERWISE COMPROMISE THE REGISTERED PERSON'S RESPONSIBILITIES TO THE FIRM OR FIRM'S CUSTOMERS, OR BE VIEWED BY CUSTOMERS OR THE PUBLIC AS PART OF THE FIRM'S BUSINESS; SHOULD BE SUBJECT TO SPECIFIC CONDITIONS OR LIMITATIONS OR PROHIBITED; OR PROPERLY IS CHARACTERIZED AS AN OBA OR WHETHER IT SHOULD BE TREATED AS AN OUTSIDE SECURITIES ACTIVITY. IN ADDITION, THE WSPS DO NOT REQUIRE THAT SUPERVISORS DOCUMENT THEIR CONSIDERATION OF THE FACTORS SET FORTH IN FINRA RULE 3270.01. FROM JUNE 2021 THROUGH AT LEAST JANUARY 2023, THE FIRM'S BUSINESS FOCUSED ON RECOMMENDING PRIVATE PLACEMENTS OF SECURITIES TO RETAIL CUSTOMERS. DURING THIS PERIOD, TWO OF THE FIRM'S REGISTERED REPRESENTATIVES DISCLOSED SEVEN OBAS, INCLUDING THREE THAT RELATED TO BUSINESS RELATIONSHIPS WITH ISSUERS OF THE FIRM'S PRIVATE PLACEMENT OFFERINGS. THE FIRM APPROVED THESE ACTIVITIES BUT

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	FAILED TO CONSIDER WHETHER THE OBAS WOULD INTERFERE WITH OR COMPROMISE THE REPRESENTATIVES' RESPONSIBILITIES TO THE FIRM OR ITS CUSTOMERS OR BE VIEWED BY CUSTOMERS OR THE PUBLIC AS PART OF THE FIRM'S BUSINESS. THE FIRM ALSO FAILED TO DETECT OR INVESTIGATE RED FLAGS CONTAINED WITHIN THE REGISTERED REPRESENTATIVES' OBA DISCLOSURE FORMS REGARDING THE NATURE OF THEIR ACTIVITIES.
Initiated By:	FINRA
Date Initiated:	10/14/2026
Docket/Case Number:	2022075203301
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:	10/14/2026
Sanctions Ordered:	Censure Monetary/Fine $40,000.00
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	WHICH THE FIRM WAS CENSURED, FINED $40,000.00 AND REQUIRED TO COMPLY WITH THE UNDERTAKING IN THIS AWC.
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND FINDINGS RELATING TO DEFICIENCIES IN ITS SUPERVISION OF OUTSIDE BUSINESS ACTIVITIES (OBAS). FINRA FOUND THAT, ALTHOUGH THE FIRM'S WRITTEN SUPERVISORY PROCEDURES (WSPS) REQUIRED SUPERVISORS TO REVIEW DISCLOSED OBAS FOR POTENTIAL CONFLICTS OF INTEREST, THEY DID NOT PROVIDE SUFFICIENT GUIDANCE FOR EVALUATING AND DOCUMENTING THE FACTORS REQUIRED UNDER FINRA RULE 3270.01. FROM JUNE 2021 THROUGH AT LEAST JANUARY 2023, TWO REGISTERED REPRESENTATIVES DISCLOSED SEVEN OBAS, INCLUDING THREE INVOLVING ISSUERS OF PRIVATE PLACEMENTS HANDLED BY THE FIRM. ALTHOUGH THE FIRM REVIEWED AND APPROVED THESE ACTIVITIES, FINRA DETERMINED THAT THE REVIEWS DID NOT ADEQUATELY ADDRESS POTENTIAL CONFLICTS OF INTEREST, THE REPRESENTATIVES' RESPONSIBILITIES TO THE FIRM AND ITS CUSTOMERS, OR WHETHER THE

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ACTIVITIES COULD BE VIEWED AS PART OF THE FIRM'S BUSINESS. FINRA ALSO FOUND THAT CERTAIN INFORMATION IN THE OBA DISCLOSURES SHOULD HAVE PROMPTED ADDITIONAL SUPERVISORY REVIEW.

Disclosure 2 of 2

Reporting Source:	Regulator
Current Status:	Final
Allegations:	THE SECURITIES AND EXCHANGE COMMISSION ("COMMISSION") DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS BE, AND HEREBY ARE, INSTITUTED AGAINST VISTIA CAPITAL, LLC ("VISTIA CAPITAL" OR "RESPONDENT"). IN ANTICIPATION OF THE INSTITUTION OF THESE PROCEEDINGS, RESPONDENT HAS SUBMITTED AN OFFER OF SETTLEMENT (THE "OFFER") WHICH THE COMMISSION HAS DETERMINED TO ACCEPT. ON THE BASIS OF THIS ORDER AND RESPONDENT'S OFFER, THE COMMISSION FINDS THAT: THIS MATTER INVOLVES VISTIA CAPITAL'S FAILURE TO FILE WITH THE COMMISSION AND TO DELIVER TO RETAIL INVESTORS A FORM CRS THAT COMPLIES WITH THE REQUIREMENTS OF RULE 17A-14 UNDER THE EXCHANGE ACT. AFTER HIRING A FINANCIAL PROFESSIONAL WITH DISCIPLINARY HISTORY REPORTED ON ITEM 14A OF FORM U4 IN AUGUST 2021, VISTIA CAPITAL WAS REQUIRED TO UPDATE ITS FORM CRS WITHIN 30 DAYS TO DISCLOSE THAT ONE OF ITS FINANCIAL PROFESSIONALS HAD DISCIPLINARY HISTORY BUT FAILED TO DO SO IN A TIMELY MANNER. VISTIA CAPITAL DID NOT CORRECT ITS FORM CRS'S LEGAL OR DISCIPLINARY HISTORY DISCLOSURE UNTIL OCTOBER 18, 2023. AS A RESULT OF THIS CONDUCT, VISTIA CAPITAL WILLFULLY VIOLATED SECTION 17(A)(1) OF THE EXCHANGE ACT AND RULE 17A-14 THEREUNDER.
Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	09/25/2024
Docket/Case Number:	3-22202
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	09/25/2024

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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 $60,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	IT IS ORDERED THAT THE FIRM CEASE AND DESIST; IS CENSURED; AND SHALL, WITHIN 10 DAYS OF THE ENTRY OF THIS ORDER, PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF $60,000 TO THE SEC.
Regulator Statement	IN VIEW OF THE FOREGOING, THE COMMISSION DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST TO IMPOSE THE SANCTIONS AGREED TO IN RESPONDENT VISTIA CAPITAL'S OFFER. ACCORDINGLY, PURSUANT TO SECTIONS 15(B) AND 21C OF THE EXCHANGE ACT, IT IS HEREBY ORDERED THAT: RESPONDENT CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 17(A)(1) OF THE EXCHANGE ACT AND RULE 17A-14 THEREUNDER; IS CENSURED; AND SHALL, WITHIN 10 DAYS OF THE ENTRY OF THIS ORDER, PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF $60,000 TO THE SEC.

Reporting Source:	Firm
Current Status:	Final
Allegations:	THE SECURITIES AND EXCHANGE COMMISSION ("COMMISSION") DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS BE, AND HEREBY ARE, INSTITUTED AGAINST VISTIA CAPITAL, LLC ("VISTIA CAPITAL" OR "RESPONDENT"). IN ANTICIPATION OF THE INSTITUTION OF THESE PROCEEDINGS, RESPONDENT HAS SUBMITTED AN OFFER OF SETTLEMENT (THE "OFFER") WHICH THE COMMISSION HAS DETERMINED TO ACCEPT. ON THE BASIS OF THIS ORDER AND RESPONDENT'S OFFER, THE COMMISSION FINDS THAT: THIS MATTER INVOLVES VISTIA CAPITAL'S FAILURE TO FILE WITH THE COMMISSION AND TO DELIVER TO RETAIL INVESTORS A FORM CRS THAT COMPLIES WITH THE REQUIREMENTS OF RULE 17A-14 UNDER THE EXCHANGE ACT. AFTER HIRING A FINANCIAL PROFESSIONAL WITH DISCIPLINARY HISTORY REPORTED ON ITEM 14A OF FORM U4 IN AUGUST 2021, VISTIA CAPITAL WAS REQUIRED TO UPDATE ITS FORM CRS WITHIN 30 DAYS TO DISCLOSE THAT ONE OF ITS FINANCIAL PROFESSIONALS HAD DISCIPLINARY HISTORY BUT FAILED TO DO SO IN A

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	TIMELY MANNER. VISTIA CAPITAL DID NOT CORRECT ITS FORM CRS'S LEGAL OR DISCIPLINARY HISTORY DISCLOSURE UNTIL OCTOBER 18, 2023. AS A RESULT OF THIS CONDUCT, VISTIA CAPITAL WILLFULLY VIOLATED SECTION 17(A)(1) OF THE EXCHANGE ACT AND RULE 17A-14 THEREUNDER.
Initiated By:	SEC
Date Initiated:	09/25/2024
Docket/Case Number:	3-22202
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	09/25/2024
Sanctions Ordered:	Censure Monetary/Fine $60,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	IT IS ORDERED THAT THE FIRM CEASE AND DESIST; IS CENSURED; AND SHALL, WITHIN 10 DAYS OF THE ENTRY OF THIS ORDER, PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF $60,000 TO THE SEC.
Firm Statement	PURSUANT TO SECTIONS 15(B) AND 21C OF THE EXCHANGE ACT, THE FIRM WAS ORDERED TO CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 17(A)(1) OF THE EXCHANGE ACT AND RULE 17A-14; CENSURED AND TO PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF $60,000 TO THE SEC.

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End of Report

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