

BrokerCheck Report

ENTORO SECURITIES, LLC

CRD# 35192

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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

ENTORO SECURITIES, LLC

CRD# 35192

SEC# 8-46630

Main Office Location

7941 KATY FREEWAY SUITE 516 HOUSTON, TX 77024 Regulated by FINRA Dallas Office

Mailing Address

7941 KATY FREEWAY SUITE 516 HOUSTON, TX 77024

Business Telephone Number

713-823-2900

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 05/28/2008. Its fiscal year ends in September.

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
- 53 U.S. states and territories

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

This firm conducts 3 types of businesses.

This firm is affiliated with financial or investment institutions.

This firm does not have referral or financial arrangements with other brokers or dealers.

Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm?

Yes

The following types of disclosures have been reported:

Type Count
Regulatory Event 1

This firm is classified as a limited liability company.

This firm was formed in Delaware on 05/28/2008.

Its fiscal year ends in September.

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.

ENTORO SECURITIES, LLC

Doing business as ENTORO SECURITIES, LLC

CRD# 35192

SEC# 8-46630

Main Office Location

7941 KATY FREEWAY SUITE 516 HOUSTON, TX 77024

Regulated by FINRA Dallas Office

Mailing Address

7941 KATY FREEWAY SUITE 516 HOUSTON, TX 77024

Business Telephone Number

713-823-2900



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): ENTORO CAPITAL LLC (WY)

Is this a domestic or foreign entity or an individual?

Domestic Entity

Position SOLE MEMBER

Position Start Date 09/2020

Percentage of Ownership 75% or more

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

Yes

Is this a public reporting company?

No

Legal Name & CRD# (if any):

COPSON, MEIHUI

7187064

Is this a domestic or foreign entity or an individual?

Individual

entity or an individual?

AML COMPLIANCE PRINCIPAL

Position Start Date

08/2025

Percentage of Ownership

Less than 5%

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

No

Is this a public reporting

company?

Position

No

Legal Name & CRD# (if any):

COPSON, MEIHUI

7187064

Is this a domestic or foreign entity or an individual?

Individual

Position

REGISTERED PRINCIPAL

Position Start Date

10/2025

User Guidance

Direct Owners and Executive Officers (continued)

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of No

the firm?

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

GOODIN, DIANE MARIE

3117840

Is this a domestic or foreign entity or an individual?

Individual

FINOP

Position Start Date

10/2008

Percentage of Ownership

Less than 5%

Does this owner direct the

management or policies of

the firm?

Position

Nο

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

ROW, CATALINA ELIZABETH

7631359

Is this a domestic or foreign entity or an individual?

Individual

Position

REGISTERED PRINCIPAL

Position Start Date

08/2025

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of

No

the firm?

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

ROW, JAMES CAVEDO

User Guidance

Direct Owners and Executive Officers (continued)

1751837

Is this a domestic or foreign entity or an individual?

Individual

Position DESIGNATED PRINCIPAL, CHIEF COMPLIANCE OFFICER

Position Start Date 07/2015

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?



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



Indirect Owners

Legal Name & CRD# (if any): ENTORO LLC (DE)

Is this a domestic or foreign entity or an individual?

Domestic Entity

Company through which indirect ownership is established

ENTORO CAPITAL LLC (WY)

Relationship to Direct Owner

SOLE MEMBER

Relationship Established

09/2020

Percentage of Ownership

75% or more

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

Yes

Is this a public reporting company?

No

Legal Name & CRD# (if any):

ROW, JAMES CAVEDO

1751837

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is

ENTORO LLC (DE)

Relationship to Direct Owner

SOLE MEMBER

Relationship Established

09/2020

Percentage of Ownership

75% or more

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

Yes

Is this a public reporting

No

company?

established

Firm History

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



This firm was previously: THE PETROLEUM CLEARINGHOUSE, INC.

Date of Succession: 03/20/2013

Predecessor CRD#: 35192
Predecessor SEC#: 8-46630

Description PCI WAS MERGERED INTO ITS PARENT HOLIDNG COMPANY (PCH), WITH

PCH ASSUMING ALL ASSETS AND LIABILTIES AND CHANGING ITS NAME TO THE OIL AND GAS ASSET CLEARINGHOUSE II, LLC, AND THE BUSINESS, OPERATIONS, MANAGEMENT AND CAPITAL OF PCI TRANSFERED TO PCH. IN ADDITION THERE IS NO CHANGE IN OFFICE LOCATION OR LINES OF BUSINESS. THE CONTROL OWNERS OF THE BROKER-DEALER ARE THE SAME. THERE WAS A CHANGE IN OWNERSHIP. THE PARENT COMPANY BECAME THE BD AND ITS OWNER WAS REMOVED FROM SCH. B AND

ADEED TO SCH. A.

This firm was previously: THE PETROLEUM CLEARINGHOUSE, INC.

Date of Succession: 03/20/2013

Predecessor CRD#: 35192
Predecessor SEC#: 8-46630

Description PCI WAS MERGERED INTO ITS PARENT HOLIDNG COMPANY (PCH), WITH

PCH ASSUMING ALL ASSETS AND LIABILTIES AND CHANGING ITS NAME TO THE OIL AND GAS ASSET CLEARINGHOUSE II, LLC, AND THE BUSINESS, OPERATIONS, MANAGEMENT AND CAPITAL OF PCI TRANSFERED TO PCH. IN ADDITION THERE IS NO CHANGE IN OFFICE LOCATION OR LINES OF BUSINESS. THERE HAS BEEN NO CHANGE IN CONTROL FROM THE

CONTROL OWNERS OF THE BROKER-DEALER.





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 53 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	10/19/1993

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: No

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: No

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	03/31/1994





U.S. States & Territories	Status	Date Effective
Alabama	Approved	06/29/1994
Alaska	Approved	06/06/1994
Arizona	Approved	04/26/2018
Arkansas	Approved	06/10/1994
California	Approved	04/15/1994
Colorado	Approved	04/21/1994
Connecticut	Approved	06/10/1999
Delaware	Approved	04/30/2018
District of Columbia	Approved	05/04/2018
Florida	Approved	04/27/2018
Georgia	Approved	06/08/2018
Hawaii	Approved	06/14/2018
Idaho	Approved	04/25/2018
Illinois	Approved	05/16/1994
Indiana	Approved	06/04/2018
Iowa	Approved	04/18/2018
Kansas	Approved	05/29/2018
Kentucky	Approved	04/24/2018
Louisiana	Approved	06/01/1994
Maine	Approved	05/04/2018
Maryland	Approved	04/27/2018
Massachusetts	Approved	07/28/1999
Michigan	Approved	06/13/1994
Minnesota	Approved	05/11/2018
Mississippi	Approved	05/09/1994
Missouri	Limited	05/16/2018
Montana	Approved	06/01/1994
Nebraska	Approved	10/07/1994
Nevada	Approved	04/19/2018
New Hampshire	Approved	05/29/2018
New Jersey	Approved	05/09/2018
New Mexico	Approved	05/13/1994
New York	Approved	07/20/1999

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	04/20/2018
North Dakota	Approved	05/10/2018
Ohio	Approved	04/24/2018
Oklahoma	Approved	05/19/1994
Oregon	Approved	06/14/2018
Pennsylvania	Approved	05/21/1999
Puerto Rico	Approved	03/10/2021
Rhode Island	Approved	04/19/2018
South Carolina	Approved	04/18/2018
South Dakota	Approved	04/18/2018
Tennessee	Approved	04/25/2018
Texas	Approved	01/31/1994
Utah	Approved	05/31/1994
Vermont	Approved	04/27/2018
Virgin Islands	Approved	02/24/2023
Virginia	Approved	04/26/2018
Washington	Approved	05/08/2018
West Virginia	Approved	04/29/1999
Wisconsin	Approved	05/16/2018
Wyoming	Approved	06/04/2018

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 3 types of businesses.

Types of Business

Broker or dealer selling oil and gas interests

Private placements of securities

Other - INVESTMENT BANKING AND MERGERS AND ACQUISITION ADVISORY SERVICES.

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

Plationships the firm has with other firms in the securities, investment

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.

ENTORO ADVISORS is under common control with the firm.

CRD #: 323700

Business Address: 333 WEST LOOP NORTH

SUITE 333

HOUSTON, TX 77024

Effective Date: 01/01/2023

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory

Activities:

Yes

Description:BOTH ENTITIES ARE UNDER COMMON CONTROL THROUGH JAMES C. ROW

(CRD #1751837).

ENTORO COMMODITIES, LLC is under common control with the firm.

Business Address: 333 WEST LOOP NORTH

SUITE 333

HOUSTON, TX 77024

Effective Date: 09/02/2021

Foreign Entity: No

Country:

Securities Activities: Yes
Investment Advisory No

Activities:

...

Description:BOTH ENTITIES ARE UNDER COMMON CONTROL THROUGH JAMES C. ROW

(CRD #1751837).

User Guidance

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	1	0



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:

SEC EXCHANGE ACT RULE 17A-3, FINRA AND NASD BY-LAWS SCHEDULE A, SECTION 1, FINRA RULE 2010, NASD RULES 2110, 3110: THE FIRM FAILED TO ACCURATELY ACCOUNT FOR ALL AUCTION REVENUES WITHIN ITS BOOKS AND RECORDS. UNDER A WRITTEN MANAGEMENT SERVICES AGREEMENT BETWEEN THE FIRM AND AN ENTITY, A NON FINRA MEMBER FIRM, THE ENTITY PAID THE FIRM A MONTHLY RETAINER FEE FOR EXCLUSIVE RETENTION OF THE FIRM AS A BROKER DEALER FOR OIL AND GAS AUCTION AND OTHER SALES AND PURCHASE ACTIVITIES OF THE ENTITY. FOR SEVERAL YEARS, THIS RETAINER FEE WAS THE ONLY REVENUE REFLECTED ON THE FIRM'S FINANCIAL STATEMENTS. NONE OF THE REVENUES RELATED TO THE OIL AND GAS AUCTION BUSINESS CONDUCTED BY THE FIRM AND THE ENTITY WERE REFLECTED ON THE FIRM'S BOOKS AND RECORDS, WHICH RESULTED IN AN UNDERSTATEMENT OF THE REVENUE REPORTED BY THE FIRM. THE FIRM REPORTED TOTAL REVENUE OF APPROXIMATELY \$1,071,921 FOR SAID PERIOD, WHILE THE ENTITY'S BOOKS AND RECORDS REPORTED AUCTION-RELATED REVENUE OF APPROXIMATELY \$55,115,834 FOR THE SAME TIME PERIOD. FOR FIVE ANNUAL PERIODS, EACH YEAR, FINRA SENT THE FIRM AN INVOICE FOR THE FIRM'S GROSS INCOME ASSESSMENT, WHICH FINRA MEMBER FIRMS ARE REQUIRED TO PAY PURSUANT TO SCHEDULE A, SECTION 1 OF FINRA'S BY-LAWS. DURING THAT PERIOD, NASD AND FINRA CALCULATED THE FIRM'S GROSS INCOME ASSESSMENT ACCORDING TO THE UNDERSTATED REVENUE THAT THE FIRM REPORTED FOR THE PREVIOUS YEAR IN ITS FINANCIAL AND OPERATIONAL COMBINED UNIFORM SINGLE REPORT (FOCUS) FILINGS. THE FIRM PAID THESE INVOICES IN FULL, BUT BECAUSE ITS REVENUE WAS UNDERSTATED, THE FIRM UNDERPAID ITS GROSS INCOME ASSESSMENT BY A TOTAL OF \$73,294.82 FOR THE FIVE YEARS, THE FIRM WAS SENT AN INVOICE FOR THAT DEFICIENCY AND HAS NOW PAID THAT AMOUNT IN FULL.

Initiated By: FINRA

Date Initiated: 10/24/2012

Docket/Case Number: 2011025622701

Principal Product Type: Other

Other Product Type(s): OIL AND GAS AUCTION

Principal Sanction(s)/Relief

Sought:

Other

Other Sanction(s)/Relief

Sought:

N/A

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/24/2012



Does the order constitute a

final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or No

deceptive conduct?
Sanctions Ordered:

Censure

Monetary/Fine \$50,000.00

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 \$50,000. FINE PAID IN

FULL ON 11/6/2012.

Reporting Source: Firm

Current Status: Final

Allegations: FINRA ALLEGED THAT APPLICANT FAILED TO ACCURATELY ACCOUNT FOR

ALL AUCTION RELATED REVENUES WITHIN APPLICANTS BOOKS AND RECORDS RESULTING IN A VIOLATION OF SEA RULE 17A-3, NASD RULES

3110 AND 2110 AND FINRA 2010.

Initiated By: FINRA

Date Initiated: 12/23/2011

Docket/Case Number: 2011025622701

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Censure

Other Sanction(s)/Relief

Sought:

FINE

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/24/2012

Sanctions Ordered: Censure

Monetary/Fine \$50,000.00

Other Sanctions Ordered: REPAYMENT OF UNPAID GIA OF \$73,294.82.



Sanction Details: PAID \$73,294.82 ON 10/10/12 AND PAID \$50,000 ON 11/5/12.

www.finra.org/brokercheck

End of Report



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