

BrokerCheck Report

BRITEHORN SECURITIES

CRD# 36402

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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:
 - 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.



BRITEHORN SECURITIES

CRD# 36402

SEC# 8-47217

Main Office Location

1401 LAWRENCE ST
SUITE 1600
DENVER, CO 80202
Regulated by FINRA Denver Office

Mailing Address

1401 LAWRENCE ST
SUITE 1600
DENVER, CO 80202

Business Telephone Number

720-465-5305

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 Colorado on 10/31/2013.

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
- 52 U.S. states and territories

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

This firm conducts 4 types of businesses.

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	3



Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Colorado on 10/31/2013.

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.

BRITEHORN SECURITIES

Doing business as BRITEHORN SECURITIES

CRD# 36402

SEC# 8-47217

Main Office Location

1401 LAWRENCE ST
SUITE 1600
DENVER, CO 80202

Regulated by FINRA Denver Office

Mailing Address

1401 LAWRENCE ST
SUITE 1600
DENVER, CO 80202

Business Telephone Number

720-465-5305



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): BRITEHORN PARTNERS LLC

Is this a domestic or foreign entity or an individual? Domestic Entity

Position DIRECT OWNER

Position Start Date 04/2018

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

Legal Name & CRD# (if any): ARMSTRONG, BOBBI JEANNE
2828244

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

Position CHIEF COMPLIANCE OFFICER

Position Start Date 11/2015

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): HURRY, ANDREW DUNCAN
5131486

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

Position CHIEF FINANCIAL OFFICER

Position Start Date 05/2016

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): STORY, BRETT HOWARD
5580403

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

Position PRINCIPAL

Position Start Date 01/2015

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): STORY, NATALIA KLISHINA
7271729

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

Position CHIEF COMPLIANCE OFFICER

Position Start Date 11/2020

Percentage of Ownership Less than 5%

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

Is this a public reporting company?



Firm Profile

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

Indirect Owners

Legal Name & CRD# (if any):	ARMSTRONG, BOBBI JEANNE 2828244
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	BRITEHORN PARTNERS, LLC
Relationship to Direct Owner	DIRECT OWNER
Relationship Established	11/2013
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):	STORY, BRETT HOWARD 5580403
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	BRITEHORN PARTNERS, LLC
Relationship to Direct Owner	DIRECT OWNER
Relationship Established	11/2013
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



Firm History

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

This firm was previously:	ANDREWS SECURITIES, LLC
Date of Succession:	06/05/2018
Predecessor CRD#:	36402
Description	PURSUANT TO A PLAN OF CONVERSION, AND AS APPROVED BY FINRA IN A CONTINUING MEMBERSHIP APPLICATION, LOHI MB, LLC, MANAGER OF ANDREWS SECURITIES/DBA LOHI SECURITIES, HAS ACQUIRED 100% OF ANDREWS SECURITIES INCLUDING ALL ASSETS AND LIABILITIES OF THE COMPANY THE SUCCESSOR COMPANY WILL BE NAMED LOHI SECURITIES LLC. ALL ASSETS AND LIABILITIES WERE ASSUMED BY THE SUCCESSOR.
This firm was previously:	ANDREWS SECURITIES, LLC
Date of Succession:	04/26/2018
Predecessor CRD#:	36402
Description	PURSUANT TO A PLAN OF CONVERSION, AND AS APPROVED BY FINRA IN A CONTINUING MEMBERSHIP APPLICATION, THE COMPANY, ANDREWS SECURITIES, CONVERTED FROM A LIMITED LIABILITY COMPANY ORGANIZED UNDER DELAWARE LAW TO A LIMITED LIABILITY COMPANY ORGANIZED UNDER COLORADO LAW TO BE NAMED LOHI SECURITIES LLC. ALL ASSETS AND LIABILITIES WERE ASSUMED BY SUCCESSOR.
This firm was previously:	ANDREWS SECURITIES, LLC
Date of Succession:	04/26/2018
Predecessor CRD#:	36402
Description	PURSUANT TO A PLAN OF CONVERSION, AND AS APPROVED BY FINRA IN A CONTINUING MEMBERSHIP APPLICATION, THE COMPANY, ANDREWS SECURITIES, CONVERTED FROM A LIMITED LIABILITY COMPANY ORGANIZED UNDER DELAWARE LAW TO A LIMITED LIABILITY COMPANY ORGANIZED UNDER COLORADO LAW TO BE NAMED LOHI SECURITIES LLC. ALL ASSETS AND LIABILITIES WERE ASSUMED BY SUCCESSOR. AT THE TIME OF THE SUCCESSION, THERE WAS NO CHANGE IN OWNERSHIP OR CONTROL.
This firm was previously:	ANDREWS SECURITIES LLC
Date of Succession:	04/26/2018
Predecessor CRD#:	36402
Description	LOHI MB, LLC HAS PURCHASED ANDREWS SECURITIES LLC EFFECTIVE APRIL 16, 2018 PURSUANT TO FINRA'S APPROVAL OF LOHI MB, LLC'S

CHANGE OF MEMBERSHIP APPLICATION. LOHI MB, LLC PURCHASED A 100% OWNERSHIP INTEREST IN ANDREWS SECURITIES LLC INCLUDING ALL ASSETS AND LIABILITIES.



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 52 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	11/07/1994

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	11/07/1994



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	03/24/2015
Alaska	Approved	04/04/2017
Arizona	Approved	07/22/2004
Arkansas	Approved	02/22/2016
California	Approved	11/08/1999
Colorado	Approved	03/21/2001
Connecticut	Approved	06/22/2015
Delaware	Approved	01/07/2010
District of Columbia	Approved	06/27/2015
Florida	Approved	10/21/2003
Georgia	Approved	09/21/2015
Hawaii	Approved	06/05/2017
Idaho	Approved	12/11/2015
Illinois	Approved	10/03/2002
Indiana	Approved	12/31/2013
Iowa	Approved	06/12/2014
Kansas	Approved	03/07/2016
Kentucky	Approved	03/09/2015
Louisiana	Approved	02/16/2016
Maine	Approved	02/23/2016
Maryland	Approved	06/26/2015
Massachusetts	Approved	06/18/2014
Michigan	Approved	02/08/2005
Minnesota	Approved	07/14/2015
Mississippi	Approved	02/24/2016
Missouri	Approved	07/20/2015
Montana	Approved	04/11/2017
Nebraska	Approved	06/17/2014
Nevada	Approved	11/26/2003
New Hampshire	Approved	04/15/2016
New Jersey	Approved	08/15/2014
New Mexico	Approved	02/18/2016
New York	Approved	03/14/1996

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	02/11/2016
North Dakota	Approved	03/07/2016
Ohio	Approved	06/12/2014
Oklahoma	Approved	02/19/2016
Oregon	Approved	03/22/2016
Pennsylvania	Approved	06/04/2014
Puerto Rico	Approved	03/17/2016
Rhode Island	Approved	02/11/2016
South Carolina	Approved	02/18/2016
South Dakota	Approved	02/12/2016
Tennessee	Approved	07/24/2015
Texas	Approved	12/04/2003
Utah	Approved	03/02/2009
Vermont	Approved	02/19/2016
Virginia	Approved	03/09/2016
Washington	Approved	02/18/2016
West Virginia	Approved	02/17/2016
Wisconsin	Approved	06/21/2005
Wyoming	Approved	04/11/2017



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 4 types of businesses.

Types of Business

Broker or dealer selling corporate debt securities

Underwriter or selling group participant (corporate securities other than mutual funds)

Private placements of securities

Other - THE APPLICANT WILL PROVIDE ADVICE TO COMPANIES SEEKING EITHER TO MERGE WITH ANOTHER CORPORATE ENTITY OR TO ACQUIRE OTHER COMPANIES AND ASSISTANCE IN IDENTIFYING THE "TARGET" COMPANIES. THE APPLICANT MAY ALSO ADVISE COMPANIES THAT ARE FOR SALE OR ARE BEING SOLD.

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:

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.

Firm Operations

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.



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



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	3	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 3

Reporting Source: Regulator

Current Status: Final



Allegations:	SEC RULE 17A-4, NASD RULES 2110, 3110 - IN CONNECTION WITH WORK BEING DONE ON ITS ELECTRONIC MAIL BACKUP SYSTEM, IT FAILED TO PRESERVE ANY OF THE FIRM'S INTERNAL OR EXTERNAL EMAIL COMMUNICATIONS.
Initiated By:	NASD
Date Initiated:	07/20/2006
Docket/Case Number:	E3A2005001301
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:	07/20/2006
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 \$25,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, KEATING SECURITIES, LLC., CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE, THE FIRM IS CENSURED AND FINED \$25,000.
Reporting Source:	Firm
Current Status:	Final
Allegations:	SEC RULE 17A-4, NASD RULES 2110, 3110 - IN CONNECTION WITH WORK BEING DONE ON THE ELECTRONIC MAIL BACKUP SYSTEM, FIRM COULD NOT PRESERVE THE FIRM'S INTERNAL OR EXTERNAL EMAIL COMMUNICATIONS.
Initiated By:	NASD



Date Initiated: 07/20/2006
Docket/Case Number: E3A2005001
Principal Product Type: Other
Other Product Type(s):
Principal Sanction(s)/Relief Sought: Censure
Other Sanction(s)/Relief Sought: MONETARY FINE
Resolution: Acceptance, Waiver & Consent(AWC)
Resolution Date: 07/20/2006
Sanctions Ordered: Censure
 Monetary/Fine \$25,000.00
Other Sanctions Ordered:
Sanction Details: LETTER OF ACCEPTANCE, WAIVER, CENSURE AND CONSENT SIGNED.
 FINE OF \$25,000.00 ACCEPTED.

Disclosure 2 of 3

Reporting Source: Regulator
Current Status: Final
Allegations: SEC RULE 17A-3 AND NASD RULES 2110, 3011(A), 3011(B), 3011(C) -
 RESPONDENT MEMBER DID NOT ENFORCE ITS CUSTOMER
 IDENTIFICATION PROGRAM (CIP) IN THAT THE FIRM DID NOT FOLLOW ITS
 CIP PROCEDURES, THE CIP WAS NOT IMPLEMENTED WITH RESPECT TO
 CUSTOMERS WHO PURCHASED INTERESTS IN A PRIVATE PLACEMENT
 AND A CUSTOMER WHO PARTICIPATED IN AN INCOME FUND OFFERING
 THROUGH THE FIRM, AND DID NOT PROVIDE TO THESE CUSTOMERS,
 PRIOR TO THE ESTABLISHMENT OF THEIR ACCOUNTS, THE REQUIRED
 WRITTEN NOTICE THAT THE FIRM IS REQUESTING INFORMATION IN
 ORDER TO VERIFY IDENTITY; FIRM'S WRITTEN ANTI-MONEY LAUNDERING
 (AML) PROGRAM WAS NOT REASONABLY DESIGNED TO CAUSE THE
 REPORTING OF SUSPICIOUS ACTIVITY BECAUSE THE PROCEDURES
 REFERRED TO PROSPECTIVE REPORTING RULES AND HAD NOT BEEN
 UPDATED TO REFLECT THAT SUCH RULE HAD BECOME EFFECTIVE; THE
 FIRM'S WRITTEN AML PROGRAM WAS NOT REASONABLY DESIGNED TO
 CAUSE THE FIRM TO COMPLY WITH ITS OBLIGATION TO REVIEW
 CUSTOMER DATA IN RESPONSE TO PERIODIC E-MAILS FROM THE
 FINANCIAL CRIMES ENFORCEMENT NETWORK (FINCEN) AND TO NOTIFY



FINCEN IN THE EVENT THAT THE FIRM'S CUSTOMER RECORDS INCLUDED INFORMATION PERTAINING TO AN INDIVIDUAL OR ENTITY IDENTIFIED IN THE E-MAIL AND DID NOT REVIEW ITS RECORDS FOR PURPOSES OF DETERMINING WHETHER IT HAD SUCH INFORMATION; THE FIRM'S CUSTOMER ACCOUNT RECORDS DID NOT INCLUDE ALL OF THE INFORMATION REQUIRED BY NASD AND SEC RULES.

Initiated By:	NASD
Date Initiated:	12/01/2005
Docket/Case Number:	E3A2004002401
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:	12/01/2005
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:	Censure Monetary/Fine \$25,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, KEATING SECURITIES, LLC, CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE THE FIRM IS CENSURED AND FINED \$25,000.

Reporting Source:	Firm
Current Status:	Final
Allegations:	NASD ALLEGED THAT THE FIRM DID NOT FOLLOW ITS CIP AND AML PROCEDURES.



Initiated By: NATIONAL ASSOCIATION OF BROKER-DEALERS
Date Initiated: 12/14/2005
Docket/Case Number: E3A20040024-01
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: 12/01/2005
Sanctions Ordered: Censure
 Monetary/Fine \$25,000.00
Other Sanctions Ordered:
Sanction Details: LETTER OF ACCEPTANCE, WAIVER, CENSURE AND CONSENT SIGNED ON 12/14/2005. \$25,000 MONETARY FINE ACCEPTED.

Disclosure 3 of 3

Reporting Source: Regulator
Current Status: Final
Allegations: COMPLAINT NO. CAF980080 FILED OCTOBER 20, 1998 AGAINST RESPONDENT GIA SECURITIES INC. ALLEGING VIOLATIONS OF NASD RULE 2110 IN THAT RESPONDENT MEMBER FAILED TO FILE FORM BD-Y2K ON A TIMELY BASIS, IN VIOLATION OF SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 AND RULE 17A-5 THEREUNDER.

 05/10/99GK: DECISION RENDERED MAY 6, 1999, WHEREIN RESPONDENT MEMBER IS CENSURED, FINED \$2,500, AND ORDERED TO PAY COSTS OF \$1,069.95, WHICH INCLUDE AN ADMINISTRATIVE FEE OF \$750 AND THE HEARING TRANSCRIPT COST OF \$319.95. IF NO FURTHER ACTION, DECISION IS FINAL JUNE 21, 1999.

 6/25/99GS: JUNE 21, 1999 - DECISION IS FINAL.
Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
Date Initiated: 10/20/1998



Docket/Case Number: CAF980080

Principal Product Type: Other

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Decision

Resolution Date: 06/21/1999

Sanctions Ordered: Censure
Monetary/Fine \$2,500.00

Other Sanctions Ordered:

Sanction Details: FINED

Reporting Source: Firm

Current Status: Final

Allegations: NASDR ALLEGED THAT APPLICANT SUBMITTED A YEAR 2000 QUESTIONNAIRE SEPT. 25, 1998 THREE DAYS AFTER THE EXTENDED DUE DATE. NASDR REFUSED TO DEEM THIS A "MINOR TYPE VIOLATION."

Initiated By: NASDR

Date Initiated: 10/20/1998

Docket/Case Number: CAF 980080

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 07/15/1999

Sanctions Ordered: Censure
Monetary/Fine \$2,500.00



Other Sanctions Ordered:

Sanction Details:

IMPOSED A CENSURE AND FINE OF \$2,500 PLUS COSTS OF \$1,069.95
WHICH WAS PAID ON OR ABOUT 7/15/1999.

End of Report



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