

BrokerCheck Report

PICTET OVERSEAS INC.

CRD# 36500

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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

PICTET OVERSEAS INC.

CRD# 36500

SEC# 8-47285

Main Office Location

1000 DE LA GAUCHETIERE WEST SUITE 3100 MONTREAL, QC, CANADA H3B 4W5 Regulated by FINRA Boston Office

Mailing Address

1000 DE LA GAUCHETIERE WEST SUITE 3100 MONTREAL, QC, CANADA H3B 4W5

Business Telephone Number

514-288-8161

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.

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
- 7 Self-Regulatory Organizations
- 53 U.S. states and territories

This firm conducts 6 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 2

This firm is classified as a corporation.

Its fiscal year ends in December.

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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.

PICTET OVERSEAS INC.

Doing business as PICTET OVERSEAS INC.

CRD# 36500

SEC# 8-47285

Main Office Location

1000 DE LA GAUCHETIERE WEST SUITE 3100 MONTREAL, QC, CANADA H3B 4W5

Regulated by FINRA Boston Office

Mailing Address

1000 DE LA GAUCHETIERE WEST SUITE 3100 MONTREAL, QC, CANADA H3B 4W5

Business Telephone Number

514-288-8161

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): **SOPAFIN SA**

Is this a domestic or foreign entity or an individual?

Foreign Entity

Position DIRECT OWNER

Position Start Date 07/2025

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):

BAHADOOR, NITISH RAJ NMN

7779149

Is this a domestic or foreign entity or an individual?

Individual

PRINCIPAL OPERATIONS OFFICER

Position Start Date

03/2024

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):

GUVLEKJIAN, JACQUES SOLOMON

7444862

Is this a domestic or foreign entity or an individual?

Individual

Position

CHIEF COMPLIANCE OFFICER

Position Start Date

08/2024

User Guidance



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):

HAMID, ERIC JEAN-PAUL

5301753

Is this a domestic or foreign entity or an individual?

Individual

Position

CHIEF EXECUTIVE OFFICER (AMERICAS) & DIRECTOR

Position Start Date

01/2016

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of

Yes

Is this a public reporting

company?

the firm?

No

Legal Name & CRD# (if any):

LA SALA, GASPARE NMN

7275103

Is this a domestic or foreign entity or an individual?

Individual

Position

DIRECTOR

Position Start Date

05/2020

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):

PETIT, GRÉGORY ANDRÉ ROGER



User Guidance

Direct Owners and Executive Officers (continued)

7275081

Is this a domestic or foreign entity or an individual?

Individual

Position DIRECTOR

Position Start Date 04/2019

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):

RUST, LAURENT MARC

7854583

Is this a domestic or foreign entity or an individual?

Individual

Position

CHIEF FINANCIAL OFFICER, CHIEF OF STAFF, PRINCIPAL FINANCIAL

OFFICER, CORPORATE SECRETARY, FIN-OP

Position Start Date

04/2024

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

Legal Name & CRD# (if any):

ZIMMERMANN, STEPHANE NMN

4143412

Is this a domestic or foreign entity or an individual?

Individual

Position

SENIOR VICE PRESIDENT

Position Start Date

01/2016

Percentage of Ownership

Less than 5%

Direct Owners and Executive Officers (continued)

Does this owner direct the management or policies of

Yes

the firm?

Is this a public reporting company?

No



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

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Indirect Owners

No information reported.

Firm History

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

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No information reported.





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, 7 SROs and 53 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	07/01/1994

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: Yes

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	07/01/1994
Cboe BYX Exchange, Inc.	Approved	06/01/2015
Cboe BZX Exchange, Inc.	Approved	06/01/2015
Cboe EDGA Exchange, Inc.	Approved	05/26/2010
Cboe EDGX Exchange, Inc.	Approved	05/27/2010
Investors' Exchange LLC	Approved	08/04/2016
Nasdaq Stock Market	Approved	02/01/2016





U.S. States & Territories	Status	Date Effective
Alabama	Approved	05/16/2011
Alaska	Approved	01/04/2011
Arizona	Approved	01/19/2011
Arkansas	Approved	03/08/2011
California	Approved	01/12/2011
Colorado	Approved	01/25/2011
Connecticut	Approved	04/06/2011
Delaware	Approved	01/13/2011
District of Columbia	Approved	01/25/2011
Florida	Approved	01/18/2011
Georgia	Approved	01/04/2011
Hawaii	Approved	02/08/2011
Idaho	Approved	01/10/2011
Illinois	Approved	11/23/2010
Indiana	Approved	03/03/2011
Iowa	Approved	01/07/2011
Kansas	Approved	03/15/2011
Kentucky	Approved	01/19/2011
Louisiana	Approved	01/03/2011
Maine	Approved	03/21/2011
Maryland	Approved	01/13/2011
Massachusetts	Approved	10/25/2010
Michigan	Approved	01/14/2011
Minnesota	Approved	01/03/2011
Mississippi	Approved	01/13/2011
Missouri	Approved	02/16/2011
Montana	Approved	02/08/2011
Nebraska	Approved	03/14/2011
Nevada	Approved	01/07/2010
New Hampshire	Approved	03/16/2011
New Jersey	Approved	04/08/2011
New Mexico	Approved	02/28/2011
New York	Approved	10/26/2001

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	01/03/2011
North Dakota	Approved	03/21/2011
Ohio	Approved	03/15/2011
Oklahoma	Approved	01/26/2011
Oregon	Approved	03/25/2011
Pennsylvania	Approved	01/19/2011
Puerto Rico	Approved	03/24/2011
Rhode Island	Approved	01/14/2011
South Carolina	Approved	01/31/2011
South Dakota	Approved	01/11/2011
Tennessee	Approved	05/18/2011
Texas	Approved	01/22/2004
Utah	Approved	01/11/2011
Vermont	Approved	02/07/2011
Virgin Islands	Approved	01/31/2011
Virginia	Approved	01/25/2011
Washington	Approved	01/03/2011
West Virginia	Approved	01/21/2011
Wisconsin	Approved	01/27/2011
Wyoming	Approved	01/13/2011

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 6 types of businesses.

Types of Business

Exchange member engaged in exchange commission business other than floor activities

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

Broker or dealer selling corporate debt securities

U S. government securities broker

Put and call broker or dealer or option writer

Other - APPLICANT, WITH BANQUE PICTET & CIE SA, A SWISS BANK ENGAGED IN BROKERAGE SERVICES, CONDUCT PERMITTED ACTIVITIES IN ACCORDANCE WITH AND UNDER RULE 15A-6 OF THE SECURITIES EXCHANGE ACT OF 1934 (17CFR240.15A-6) VIA FOREIGN ASSOCIATED PERSON (AS PER 15A-6 DEFINITION). OTHER BUSINESSES DIRECTLY CONDUCTED BY APPLICANT OR UNDER 15A-6 INCLUDE TRADING FOR CLIENTS ON: I) NON-US LISTED SECURITIES WORLDWIDE & II) NON-US DEBT SECURITIES WORLDWIDE, WHETHER DENOMINATED IN USD OR NOT.

Other Types of Business

This firm does effect transactions in commodities, commodity futures, or commodity options.

This firm does engage in other non-securities business.

Non-Securities Business Description: APPLICANT ALSO ENGAGES IN THE FOLLOWING TYPE OF BUSINESS:

MARKETING AND EXECUTION OF OTC FOREIGN CURRENCY

EXCHANGE ACTIVITIES WITH ELIGIBLE CONTRACT PARTICIPANTS (ECP) AS PROMULGATED AND AMENDED BY THE SEC, DODD-FRANK

ACT & CFTC. FOREIGN

CURRENCY PAIRS TRADED MAY INCLUDE PRECIOUS METALS.





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 have books or records maintained by a third party.

Name: PICTET CANADA L.P.

Business Address: 1000 DE LA GAUCHETIERE WEST

SUITE 3100

MONTREAL, QC, CANADA H3B 4W5

Effective Date: 02/25/2000

Description: PICTET CANADA L.P. ("PC"), AN AFFILIATE OF APPLICANT WITH OFFICES

AT THE SAME LOCATION AS APPLICANT AND A MEMBER OF IIROC IN CANADA, MAINTAINS CERTAIN BOOKS AND RECORDS FOR APPLICANT PURSUANT TO SEC RULES 17A-3 AND 17A-4 AND NASD CONDUCT RULE 3110. PC HAS FILED AN UNDERTAKING WITH FINRA TO MAKE THESE BOOKS AND RECORDS AVAILABLE AT ALL TIME TO APPLICANT AND TO

REPRESENTATIVES OF THE SEC AND FINRA.

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

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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



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:
 - 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 2

Reporting Source: Regulator

Current Status: Final



Allegations: NASD CONDUCT RULES 2210(B)(1) AND 2210(C)(1) - RESPONDENT MEMBER

FAILED TO FILE WITH NASD AND OBTAIN PRINCIPAL APPROVAL ON FORM

LETTERS PROMOTING MUTUAL FUNDS WHICH FORM LETTERS

CONSTITUTED SALES LITERATURE.

Initiated By: NASD

Date Initiated: 07/28/2003

Docket/Case Number: C11030026

Principal Product Type: Mutual Fund(s)

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 07/28/2003

Sanctions Ordered: Censure

Monetary/Fine \$3,500.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RESPONDENT

MEMBER CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED AND FINED

\$3,500.

Reporting Source: Firm

Current Status: Final

Allegations: DURING THE PERIOD FROM AT LEAST FEBRUARY 26, 2002 THROUGH APRIL

29, 2002, PICTET FAILED TO FILE WITH NASD AND OBTAIN PRINCIPAL APPROVAL ON FORM LETTERS PROMOTING MUTUAL FUNDS WHICH FORM

LETTERS CONSTITUTED SALES LITERATURE. THIS CONDUCT

CONSTITUTES SEPARATE AND DISTINCT VIOLATIONS OF NASD CONDUCT

RULES 2210(B)(1) AND 2210(C)(1) BY PICTET.

Initiated By: NASD INC.

Date Initiated: 06/26/2003

Docket/Case Number: C11030026



Principal Product Type: Mutual Fund(s)

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Censure

Other Sanction(s)/Relief

Sought:

FINE IN THE AMOUNT OF \$3,500.00

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 07/28/2003

Sanctions Ordered: Censure

Monetary/Fine \$3,500.00

Other Sanctions Ordered: NONE

Sanction Details: THE FINE OF \$3500.00 WAS PAID IN FULL BY PICTET OVERSEAS INC. ON

AUGUST 12, 2003

Disclosure 2 of 2

Reporting Source: Regulator

Current Status: Final

Allegations: RESPONDENT MEMBER FIRM: FAILED TO DEVELOP A WRITTEN TRAINING

PLAN FOR ITS CONTINUING EDUCATION; AND FAILED TO MAINTAIN RECORDS DOCUMENTING THE IMPLEMENTATION AND COMPLETION OF ITS CONTINUING EDUCATION PLAN. (NASD CONDUCT RULE 1120.)

Initiated By: NATIONAL ASOCIATION OF SECURITIES DEALERS, INC.

Date Initiated: 08/06/1999

Docket/Case Number: C11990033

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other

Other Sanction(s)/Relief

Sought:

FINE OF \$2500.00

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 08/06/1999

Sanctions Ordered: Monetary/Fine \$2,500.00



Other Sanctions Ordered: NONE

Sanction Details: FINE OF \$2500.00

Regulator Statement 02-03-00, \$2,500 PAID ON 8/23/99, INVOICE #999-11-688

Reporting Source: Firm

Current Status: Final

Allegations: VIOLATION OF NASD CONDUCT RULE 1120.

Initiated By: NASD REGULATION, INC.

Date Initiated: 08/06/1999

Docket/Case Number: C11990033

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: 08/06/1999

Sanctions Ordered: Monetary/Fine \$2,500.00

Other Sanctions Ordered:

Sanction Details: \$2,500.00 FINE LEVIED AGAINST APPLICANT; PAID IN FULL ON 08/19/1999.

Firm Statement ALTHOUGH APPLICANT HAD CONTINUING EDUCATION, APPLICANT FAILED

TO DEVELOP A WRITTEN TRAINING PLAN FOR ITS CONTINUING

EDUCATION AND FAILED TO MAINTAIN RECORDS DOCUMENTING THE IMPLEMENTATION AND COMPLETION OF ITS CONTINUING EDUCATION

PLAN DURING THE PERIOD FROM 1995 THROUGH 1998.

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End of Report



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