

## BrokerCheck Report

### BRIGHTON SECURITIES CORP.

CRD# 3875

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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.

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**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](http://brokercheck.finra.org)



For additional information about the contents of this report, please refer to the User Guidance or [www.finra.org/brokercheck](http://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](http://www.finra.org).



## BRIGHTON SECURITIES CORP.

CRD# 3875

SEC# 8-14599

### Main Office Location

1703 MONROE AVENUE  
ROCHESTER, NY 14618-1487  
Regulated by FINRA Woodbridge Office

### Mailing Address

1703 MONROE AVENUE  
ROCHESTER, NY 14618-1487

### Business Telephone Number

(585)473-3590

This firm is a brokerage firm and an investment adviser firm. For more information about investment adviser firms, visit the SEC's Investment Adviser Public Disclosure website at:

<https://www.adviserinfo.sec.gov>

## Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

### Firm Profile

This firm is classified as a corporation.

This firm was formed in New York on 03/05/1969.

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
- 36 U.S. states and territories

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

This firm conducts 11 types of businesses.

This firm is affiliated with financial or investment institutions.

This firm has referral or financial arrangements with other brokers or dealers.

### Disclosure Events

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

Are there events disclosed about this firm? **Yes**

#### The following types of disclosures have been reported:

Type	Count
Regulatory Event	7
Arbitration	1



## Firm Profile

This firm is classified as a corporation.

This firm was formed in New York on 03/05/1969.

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.

**BRIGHTON SECURITIES CORP.**

**Doing business as BRIGHTON SECURITIES CORP.**

**CRD#** 3875

**SEC#** 8-14599

### Main Office Location

1703 MONROE AVENUE  
ROCHESTER, NY 14618-1487

**Regulated by FINRA Woodbridge Office**

### Mailing Address

1703 MONROE AVENUE  
ROCHESTER, NY 14618-1487

### Business Telephone Number

(585)473-3590



## Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

### Direct Owners and Executive Officers

<b>Legal Name &amp; CRD# (if any):</b>	BRIGHTON SECURITIES HOLDINGS INC
<b>Is this a domestic or foreign entity or an individual?</b>	Domestic Entity
<b>Position</b>	OWNER
<b>Position Start Date</b>	01/2018
<b>Percentage of Ownership</b>	75% or more
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	ALBERTS, LORI ANN
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	CCO
<b>Position Start Date</b>	01/2019
<b>Percentage of Ownership</b>	Less than 5%
<b>Does this owner direct the management or policies of the firm?</b>	No
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	CONBOY, GEORGE THOMAS 1283395
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	CHAIRMAN
<b>Position Start Date</b>	01/2018
<b>Percentage of Ownership</b>	Less than 5%

## Firm Profile



### Direct Owners and Executive Officers (continued)

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

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** HAWRYSCHUK, MELISSA  
4735549

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

**Position** EXECUTIVE OFFICER

**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?** No

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**Legal Name & CRD# (if any):** LEACH, JENNY LEE  
3257861

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

**Position** DIRECTOR OF COMPLIANCE

**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?** No

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**Legal Name & CRD# (if any):** MELONI, EKATERINA A  
7923218

Firm Profile



Direct Owners and Executive Officers (continued)

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

Position FINOP

Position Start Date 03/2025

Percentage of Ownership Less than 5%

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

Is this a public reporting company? No

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## Firm Profile

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

### Indirect Owners

<b>Legal Name &amp; CRD# (if any):</b>	CONBOY, GEORGE THOMAS 1283395
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Company through which indirect ownership is established</b>	BRIGHTON SECURITIES HOLDINGS INC.
<b>Relationship to Direct Owner</b>	CHAIRMAN
<b>Relationship Established</b>	01/2018
<b>Percentage of Ownership</b>	50% but less than 75%
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	ALEXANDER, TODD W 6501073
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Company through which indirect ownership is established</b>	BRIGHTON SECURITIES HOLDING
<b>Relationship to Direct Owner</b>	FINANCIAL ADVISOR
<b>Relationship Established</b>	12/2021
<b>Percentage of Ownership</b>	Other General Partners
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	DINORMA, SAMUEL JOSEPH
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## Firm Profile



### Indirect Owners (continued)

	5985341
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Company through which indirect ownership is established</b>	BRIGHTON SECURITIES HOLDING
<b>Relationship to Direct Owner</b>	FINANCIAL ADVISOR
<b>Relationship Established</b>	12/2022
<b>Percentage of Ownership</b>	Other General Partners
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No
<hr/>	
<b>Legal Name &amp; CRD# (if any):</b>	FASCIANO, SALVATORE ANTHONY 5227016
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Company through which indirect ownership is established</b>	BRIGHTON SECURIITES HOLDINGS INC
<b>Relationship to Direct Owner</b>	VICE PRESIDENT - FINANCIAL ADVISOR
<b>Relationship Established</b>	12/2019
<b>Percentage of Ownership</b>	Other General Partners
<b>Does this owner direct the management or policies of the firm?</b>	No
<b>Is this a public reporting company?</b>	No
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<b>Legal Name &amp; CRD# (if any):</b>	HAWRYSCHUK, MELISSA
<b>Is this a domestic or foreign entity or an individual?</b>	Individual



## Firm Profile

### Indirect Owners (continued)

**Company through which indirect ownership is established** BRIGHTON SECURITIES HOLDING

**Relationship to Direct Owner** SHAREHOLDER

**Relationship Established** 12/2021

**Percentage of Ownership** Other General Partners

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

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** HENDEE, DOUGLAS ARTHUR  
3203666

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

**Company through which indirect ownership is established** BRIGHTON SECURITIES HOLDINGS INC

**Relationship to Direct Owner** VICE PRESIDENT

**Relationship Established** 01/2018

**Percentage of Ownership** Other General Partners

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

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** KRAVETZ, ROBERT A  
5136584

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

**Company through which indirect ownership is established** BRIGHTON SECURITIES HOLDINGS INC

## Firm Profile



### Indirect Owners (continued)

**Relationship to Direct Owner** SENIOR VICE PRESIDENT- FINANCIAL ADVISOR

**Relationship Established** 01/2018

**Percentage of Ownership** Other General Partners

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

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** SCENIC BUFFALO

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

**Company through which indirect ownership is established** BRIGHTON SECURITIES HOLDING INC.

**Relationship to Direct Owner** SHAREHOLDER

**Relationship Established** 10/2018

**Percentage of Ownership** Other General Partners

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

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** WADE, CHARLES WILLIAM  
6039665

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

**Company through which indirect ownership is established** BRIGHTON SECURITIES HOLDINGS INC

**Relationship to Direct Owner** VICE PRESIDENT - FINANCIAL ADVISORS

**Relationship Established** 02/2018

**Percentage of Ownership** Other General Partners

## Firm Profile



### Indirect Owners (continued)

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

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** WADE, ETHAN JOEL  
6103060

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

**Company through which indirect ownership is established** BRIGHTON SECURITIES HOLDINGS INC

**Relationship to Direct Owner** VICE PRESIDENT - FINANCIAL ADVISOR

**Relationship Established** 02/2018

**Percentage of Ownership** Other General Partners

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

**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.





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 36 U.S. states and territories.**

Federal Regulator	Status	Date Effective
SEC	Approved	04/10/1969

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	04/15/1969



## Firm Operations

### Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	01/01/2011
Arizona	Approved	11/24/1997
California	Approved	10/31/1996
Colorado	Approved	01/31/1997
Connecticut	Approved	09/04/1998
Delaware	Approved	01/25/2012
District of Columbia	Approved	12/03/2009
Florida	Approved	01/02/1997
Georgia	Approved	10/10/2002
Hawaii	Approved	10/10/2018
Illinois	Approved	04/29/2010
Iowa	Approved	01/04/2023
Kansas	Approved	01/25/2024
Kentucky	Approved	01/31/2005
Louisiana	Approved	03/27/2006
Maine	Approved	02/16/2012
Maryland	Approved	01/29/1997
Massachusetts	Approved	03/07/1997
Michigan	Approved	09/05/1997
Minnesota	Approved	08/18/2015
Missouri	Approved	02/25/2010
Nevada	Approved	04/30/2004
New Jersey	Approved	03/12/1997
New Mexico	Approved	10/26/2018
New York	Approved	01/02/1985
North Carolina	Approved	11/10/1997
Ohio	Approved	04/01/2010
Oregon	Approved	11/16/2006
Pennsylvania	Approved	06/17/1997
Rhode Island	Approved	10/19/2005
South Carolina	Approved	01/20/1998
Tennessee	Approved	10/12/2006
Texas	Approved	01/03/2000

U.S. States & Territories	Status	Date Effective
Vermont	Approved	06/27/2002
Virginia	Approved	03/10/1999
Washington	Approved	08/05/2004



## 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 11 types of businesses.**

#### Types of Business

Broker or dealer retailing corporate equity securities over-the-counter
Broker or dealer selling corporate debt securities
Mutual fund retailer
U S. government securities broker
Municipal securities broker
Broker or dealer selling variable life insurance or annuities
Solicitor of time deposits in a financial institution
Put and call broker or dealer or option writer
Investment advisory services
Non-exchange member arranging for transactions in listed securities by exchange member
Private placements of securities

#### Other Types of Business

This firm does not effect transactions in commodities, commodity futures, or commodity options.

This firm does engage in other non-securities business.

Non-Securities Business Description: INCOME TAX PREPARATION





**Firm Operations**

**Clearing Arrangements**

This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

**Introducing Arrangements**

This firm does refer or introduce customers to other brokers and dealers.

<b>Name:</b>	WELLS FARGO CLEARING SERVICES, LLC
<b>CRD #:</b>	19616
<b>Business Address:</b>	ONE NORTH JEFFERSON AVENUE ST. LOUIS, MO 63103
<b>Effective Date:</b>	02/11/1983
<b>Description:</b>	WELLS FARGO CLEARING SERVICES, LLC IS THE APPLICANT'S CLEARING FIRM.

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## Firm Operations

### Industry Arrangements



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

**Name:** WELLS FARGO CLEARING SERVICES, LLC  
**CRD #:** 19616  
**Business Address:** ONE NORTH JEFFERSON AVENUE  
ST. LOUIS, MO 63103  
**Effective Date:** 02/11/1983  
**Description:** WELLS FARGO CLEARING SERVICES, LLC IS THE APPLICANT'S  
CLEARING FIRM.

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

**Name:** WELLS FARGO CLEARING SERVICES, LLC  
**CRD #:** 19616  
**Business Address:** ONE NORTH JEFFERSON AVENUE  
ST. LOUIS, MO 63103  
**Effective Date:** 02/11/1983  
**Description:** WELLS FARGO CLEARING SERVICES, LLC IS THE APPLICANT'S  
CLEARING FIRM.

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

**Name:** WELLS FARGO CLEARING SERVICES, LLC  
**CRD #:** 19616  
**Business Address:** ONE NORTH JEFFERSON AVENUE  
ST. LOUIS, MO 63103  
**Effective Date:** 02/11/1983  
**Description:** WELLS FARGO CLEARING SERVICES, LLC IS THE APPLICANT'S  
CLEARING FIRM.

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#### Control Persons/Financing

**This firm does not have individuals who control its management or policies through agreement.**

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



## Firm Operations

### Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

**This firm is, directly or indirectly:**

- in control of
  - controlled by
  - or under common control with
- the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.

**BRIGHTON SECURITIES TAX SERVICES is under common control with the firm.**

**Business Address:** 1703 MONROE AVENUE  
ROCHESTER, NY 14618

**Effective Date:** 01/01/2018

**Foreign Entity:** No

**Country:**

**Securities Activities:** Yes

**Investment Advisory Activities:** Yes

**Description:** BRIGHTON SECURITIES HOLDINGS INC. IS THE DIRECT OWNER AND PARENT COMPANY OF BRIGHTON SECURITIES CORP. AND BRIGHTON SECURITIES TAX SERVICES INC. THE REORGANIZATION WILL NOT RESULT IN ANY CHANGE IN THE BUSINESS, BUSINESS LINES, SUPERVISION OR DAY-TO-DAY OPERATIONS OF BRIGHTON SECURITIES AS A LICENSED BROKER-DEALER OR INVESTMENT ADVISER. PLEASE REFER TO A FINRA STAFF EMAIL DATED NOVEMBER 7, 2017, APPROVING THE CHANGE. THIS EMAIL SERVED AS FINAL APPROVAL AND NOTIFICATION.

**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	7	0
Arbitration	N/A	1	N/A



## 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 7

**Reporting Source:** Regulator

**Current Status:** Final



<b>Allegations:</b>	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 BRIGHTON SECURITIES CORP. ("BRIGHTON" 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. THE COMMISSION FINDS THAT THESE PROCEEDINGS ARISE OUT OF BRIGHTON'S FAILURE TO DISCLOSE TO ADVISORY CLIENTS CONFLICTS OF INTEREST ARISING FROM VARIOUS INCENTIVES BRIGHTON RECEIVED FROM THE CLEARING FIRM THAT IT RECOMMENDED TO ITS CLIENTS FOR CLEARING, EXECUTION, AND CUSTODIAL SERVICES ("CLEARING FIRM A"). BECAUSE OF THIS FAILURE, WHICH ALSO OCCURRED AT A NOW-CLOSED BRIGHTON AFFILIATE THAT SHARED THE SAME COMPLIANCE PERSONNEL, AND WHOSE CLIENT ACCOUNTS WERE TAKEN OVER BY BRIGHTON, BRIGHTON BREACHED ITS FIDUCIARY DUTY OF CARE, IN WILLFUL VIOLATION OF SECTION 206(2) OF THE ADVISERS ACT. IN ADDITION, BRIGHTON FAILED TO ADOPT AND IMPLEMENT WRITTEN POLICIES AND PROCEDURES REASONABLY DESIGNED TO PREVENT SUCH VIOLATIONS, IN WILLFUL VIOLATION OF SECTION 206(4) OF THE ADVISERS ACT AND RULE 206(4)7 THEREUNDER.
<b>Initiated By:</b>	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
<b>Date Initiated:</b>	09/23/2024
<b>Docket/Case Number:</b>	3-22157
<b>Principal Product Type:</b>	No Product
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Cease and Desist
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Order
<b>Resolution Date:</b>	09/23/2024
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	Yes
<b>Sanctions Ordered:</b>	Censure



Monetary/Fine \$175,000.00  
Cease and Desist/Injunction

#### Other Sanctions Ordered:

#### Sanction Details:

THE FIRM IS ORDERED TO CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTIONS 206(2) AND 206(4) OF THE ADVISERS ACT AND RULE 206(4)-7 PROMULGATED THEREUNDER, IS CENSURED, AND SHALL PAY A CIVIL MONEY PENALTY OF \$175,000.

#### Regulator Statement

AS A RESULT OF ITS CONDUCT, BRIGHTON WILLFULLY VIOLATED SECTIONS 206(2) AND 206(4) OF THE ADVISERS ACT AND RULE 206(4)-7 THEREUNDER. ACCORDINGLY, IT IS HEREBY ORDERED THAT RESPONDENT BRIGHTON CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTIONS 206(2) AND 206(4) OF THE ADVISERS ACT AND RULE 206(4)-7 PROMULGATED THEREUNDER, IS CENSURED, AND SHALL PAY A CIVIL MONEY PENALTY OF \$175,000.

#### Reporting Source:

Firm

#### Current Status:

Final

#### Allegations:

SECTION 206(2) OF THE ADVISORS ACT - THESE PROCEEDINGS ARISE OUT OF BRIGHTON SECURITIES CORP AND CONTROL AFFILIATE BRIGHTON SECURITIES CAPITAL MANAGEMENT, FAILURE TO DISCLOSE TO ADVISORY CLIENTS CONFLICTS OF INTEREST ARISING FROM VARIOUS INCENTIVES BRIGHTON SECURITIES RECEIVED FROM THE CLEARING FIRM THAT IT RECOMMENDED TO ITS CLIENTS FOR CLEARING, EXECUTION, AND CUSTODIAL SERVICES ("CLEARING FIRM A"). IN ADDITION, BRIGHTON FAILED TO ADOPT AND IMPLEMENT WRITTEN POLICIES AND PROCEDURES REASONABLY DESIGNED TO PREVENT SUCH VIOLATIONS, IN WILLFUL VIOLATION OF SECTION 206(4) OF THE ADVISERS ACT AND RULE 206(4)-7 THEREUNDER.

#### Initiated By:

SECURITIES AND EXCHANGE COMMISSION

#### Date Initiated:

07/25/2024

#### Docket/Case Number:

3-22157

#### 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:** Settled

**Resolution Date:** 09/23/2024

**Sanctions Ordered:** Censure  
Monetary/Fine \$175,000.00  
Cease and Desist/Injunction

**Other Sanctions Ordered:**

**Sanction Details:** 175,000  
PAID 8/23/2024  
THE FIRM IS ORDERED TO CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTIONS 206(2) AND 206(4) OF THE ADVISERS ACT AND RULE 206(4)-7 PROMULGATED THEREUNDER, IS CENSURED, AND SHALL PAY A CIVIL MONEY PENALTY OF \$175,000.

**Firm Statement**

SECTION 206(2) OF THE ADVISORS ACT - THESE PROCEEDINGS ARISE OUT OF BRIGHTON SECURITIES CORP AND CONTROL AFFILIATE BRIGHTON SECURITIES CAPITAL MANANGEMENT, FAILURE TO DISCLOSE TO ADVISORY CLIENTS CONFLICTS OF INTEREST ARISING FROM VARIOUS INCENTIVES BRIGHTON SECURITIES RECEIVED FROM THE CLEARING FIRM THAT IT RECOMMENDED TO ITS CLIENTS FOR CLEARING, EXECUTION, AND CUSTODIAL SERVICES ("CLEARING FIRM A"). IN ADDITION, BRIGHTON FAILED TO ADOPT AND IMPLEMENT WRITTEN POLICIES AND PROCEDURES REASONABLY DESIGNED TO PREVENT SUCH VIOLATIONS, IN WILLFUL VIOLATION OF SECTION 206(4) OF THE ADVISERS ACT AND RULE 206(4)-7 THEREUNDER.

**Disclosure 2 of 7**

**Reporting Source:** Regulator

**Current Status:** Final

**Allegations:** WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO REASONABLY SUPERVISE THE SALES PRACTICES OF A REGISTERED REPRESENTATIVE WHO ENGAGED IN A PATTERN OF UNSUITABLE SHORT-TERM TRADING OF CLASS A MUTUAL FUND SHARES IN SIX CUSTOMER ACCOUNTS. THE FINDINGS STATED THAT THE REPRESENTATIVE FREQUENTLY RECOMMENDED THE PURCHASE AND SUBSEQUENT SALE OF CLASS A SHARES WITHIN A YEAR OF PURCHASE. ON AVERAGE, THE CUSTOMERS HELD THE CLASS A MUTUAL FUNDS AT ISSUE FOR LESS





THAN FOUR MONTHS. AS A RESULT OF THESE SHORT-TERM TRADES, FIVE OF THE SIX CUSTOMERS SUFFERED COLLECTIVELY LOSSES OF APPROXIMATELY \$30,254. THE FIRM FAILED TO HAVE A REASONABLE SUPERVISORY SYSTEM TO DETECT UNSUITABLE SHORT-TERM TRADING OR SWITCHING OF CLASS A MUTUAL FUND SHARES. THE FIRM HAD NO EXCEPTION REPORTS SPECIFIC TO CLASS A MUTUAL FUND SHARES, AND NO AUTOMATED METHOD OF MONITORING CLASS A MUTUAL FUND HOLDING PERIODS. NOR DID THE FIRM IMPOSE ANY LIMITATIONS ON TRADING OR HOLDING CLASS A MUTUAL FUNDS. NEVERTHELESS, THE FIRM WAS AWARE OF RED FLAGS CONCERNING THE REPRESENTATIVE AND HER TRADING ACTIVITIES. THE FIRM PLACED THE REPRESENTATIVE ON HEIGHTENED SUPERVISION FIVE SEPARATE TIMES. IN ADDITION, ON SEVERAL OCCASIONS, THE FIRM'S SUPERVISORY PERSONNEL RAISED CONCERNS REGARDING THE "FREQUENCY" AND "VELOCITY" OF THE REPRESENTATIVE'S TRADING AND MANY OF HER SHORT TERM MUTUAL FUND TRADES OCCURRED IN THE ACCOUNTS OF CUSTOMERS WHO WERE ELDERLY AND/OR WHO HAD LONG-TERM INVESTMENT OBJECTIVES AND CONSERVATIVE RISK TOLERANCES. THE FIRM FAILED TO RESPOND APPROPRIATELY TO THESE WARNING SIGNS, OR OTHERWISE TAKE STEPS TO PREVENT THE REPRESENTATIVE'S UNSUITABLE TRADING.

<b>Initiated By:</b>	FINRA
<b>Date Initiated:</b>	12/28/2017
<b>Docket/Case Number:</b>	<a href="#">2015046536701</a>
<b>Principal Product Type:</b>	Mutual Fund(s)
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Other
<b>Other Sanction(s)/Relief Sought:</b>	N/A
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Resolution Date:</b>	12/28/2017
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$50,000.00



Disgorgement/Restitution

**Other Sanctions Ordered:**

**Sanction Details:**

THE FIRM WAS CENSURED, FINED \$50,000 AND ORDERED TO PAY \$19,454.11, PLUS INTEREST, IN RESTITUTION TO CUSTOMERS. FINES PAID IN FULL ON JANUARY 11, 2018.

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**Reporting Source:**

Firm

**Current Status:**

Final

**Allegations:**

BETWEEN MARCH 2013 AND MARCH 2014, THE FIRM FAILED TO REASONABLY SUPERVISE THE SALES PRACTICES OF ONE OF ITS REGISTERED REPRESENTATIVES, WHO ENGAGED IN A PATTERN OF UNSUITABLE, SHORT TERM TRADING WITH CLASS A MUTUAL FUND SHARES IN 6 CUSTOMER ACCOUNTS. AFTER THE FIRM DISCOVERED AND REPORTED THE VIOLATION, THE FIRM SUBSEQUENTLY TERMINATED THE REPRESENTATIVE IN MARCH OF 2014.

**Initiated By:**

FINRA

**Date Initiated:**

12/28/2017

**Docket/Case Number:**

[2015046536701](#)

**Principal Product Type:**

Mutual Fund(s)

**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:**

Other

**Other Sanction(s)/Relief Sought:**

N/A

**Resolution:**

Acceptance, Waiver & Consent(AWC)

**Resolution Date:**

12/28/2017

**Sanctions Ordered:**

Censure  
Monetary/Fine \$50,000.00  
Disgorgement/Restitution

**Other Sanctions Ordered:**

**Sanction Details:**

WITHOUT ADMITTING OR DENYING THE FINDINGS, RESPONDENT CONSENTED TO THE DESCRIBED SANCTIONS AND THE ENTRY OF FINDINGS: CENSURED AND FINED \$50,000 AND DIRECTED TO MAKE RESTITUTION IN THE PRINCIPAL AMOUNT OF \$19,453.11 TO 5 CUSTOMERS.



### Disclosure 3 of 7

<b>Reporting Source:</b>	Regulator
<b>Current Status:</b>	Final
<b>Allegations:</b>	SECTION 15(C) OF THE EXCHANGE ACT, RULE 15C3-3(K)(2)(I) THEREUNDER AND NASD RULES 1021 AND 2110: RESPONDENT, ACTING THROUGH AN INDIVIDUAL, FAILED TO ENSURE THAT IT HAD A PROPERLY DESIGNATED LIMITED PRINCIPAL-INTRODUCING BROKER/DEALER FINANCIAL AND OPERATIONS. THE FIRM OPERATED ITS BUSINESS AS AN INTRODUCING FIRM AND CLAIMED AN EXEMPTION UNDER SECTION 15 OF THE SECURITIES EXCHANGE ACT OF 1934, RULE 15C3-3(K)(2)(I) THEREUNDER, WHICH PROHIBITS THE RECEIPT OF CUSTOMER FUNDS AND/OR SECURITIES, HOWEVER, THE FIRM, ACTING THROUGH AN INDIVIDUAL, FAILED TO COMPLY WITH CLAIMED EXEMPTION IN THAT THE FIRM HELD PUBLIC CUSTOMERS' FUNDS IN ITS GENERAL BANK ACCOUNT.
<b>Initiated By:</b>	NASD
<b>Date Initiated:</b>	08/15/2006
<b>Docket/Case Number:</b>	<a href="#">E9B2005001701</a>
<b>Principal Product Type:</b>	No Product
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Resolution Date:</b>	08/15/2006
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$15,000.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	WITHOUT ADMITTING OR DENYING THE FINDINGS, RESPONDENT MEMBER



FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED AND FINED \$15,000 JOINTLY AND SEVERALLY.

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<b>Reporting Source:</b>	Firm
<b>Current Status:</b>	Final
<b>Allegations:</b>	NASD RULES 1021 AND 2110: CONBOY, ACTING ON BEHALF OF THE FIRM, FAILED TO ENSURE THAT THE FIRM HAD A PROPERLY DESIGNATED LIMITED PRINCIPAL-INTRODUCING BROKER/DEALER FINANCIAL AND OPERATIONS. THE FIRM OPERATED ITS BUSINESS AS AN INTRODUCING FIRM AND CLAIMED AND EXEMPTION UNDER SECTION 15 OF THE SECURITIES EXCHANGE ACT OF 1934, RULE 15C3-3(K)(2)(I) THEREUNDER, WHICH PROHIBITS THE RECEIPT OF CUSTOMER FUNDS AND/OR SECURITIES, HOWEVER, CONBOY, ACTING ON BEHALF OF THE FIRM, FAILED TO COMPLY WITH CLAIMED EXEMPTION IN THAT THE FIRM HELD PUBLIC CUSTOMERS' FUNDS IN ITS GENERAL BANK ACCOUNT.
<b>Initiated By:</b>	NASD
<b>Date Initiated:</b>	08/15/2006
<b>Docket/Case Number:</b>	<a href="#">E9B2005001701</a>
<b>Principal Product Type:</b>	No Product
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Censure
<b>Other Sanction(s)/Relief Sought:</b>	MONETARY FINE
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Resolution Date:</b>	08/15/2006
<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$15,000.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	WITHOUT ADMITTING OR DENYING THE FINDINGS, RESPONDENT CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; CENSURED AND FINED \$15,000 JOINTLY AND SEVERALLY.



<b>Reporting Source:</b>	Regulator
<b>Current Status:</b>	Final
<b>Allegations:</b>	<p>ON MAY 20, 2002, BRIGHTON SECURITIES SUBMITTED TO THE VERMONT SECURITIES DIVISION AN APPLICATION TO REGISTER AS A BROKER-DEALER. INCLUDED IN THE APPLICATION PACKAGE WAS AN AFFIDAVIT SIGNED BY GEORGE CONBOY, BRIGHTON'S PRESIDENT, BEFORE A NOTARY PUBLIC, WHICH STATED THAT BRIGHTON "BY OR THROUGH ANY OF ITS AGENTS HAS NOT OFFERED FOR SALE OR SOLD ANY SECURITIES, SOLICITED CLIENTS [OR] MAINTAINED ACCOUNTS...WITHIN THE STATE OF VERMONT." HOWEVER, AN INQUIRY BY THE DIVISION TO BRIGHTON'S CLEARING FIRM REVEALED THAT BRIGHTON SECURITIES HAD ACTAULLY MAINTAINED TWO ACCOUNTS FOR TWO SEPERATE VERMONT RESIDENTS SINCE JULY 22, 2000. ONE OF THOSE ACCOUNTS HAD GEORGE CONBOY LISTED AS THE SALES REPRESENTATIVE. THE INFORMATION PROVIDED BY THE CLEARING FIRM ALSO REVEALED THAT 19 NEW ACCOUNTS WERE TRANSFERRED TO BRIGHTON FROM ANOTHER FIRM BETWEEN JUNE 4, 2002 AND JUNE 6, 2002. BRIGHTON SECURITIES, HOWEVER, WAS NOT REGISTERED IN VERMONT UNTIL JUNE 27, 2002.</p> <p>AS SUCH BRIGHTON WAS FOUND TO BE IN VIOLATION OF 9 V.S.A. SECTION 4213(A) OF THE VERMONT SECURITIES ACT, CHAPTER 131, FOR TRANSACTING BUSINESS IN VERMONT AS AN UNREGISTERED BROKER-DEALER THROUGH UNREGISTERED SALES REPRESENTATIVES, AND 9 V.S.A. SECTION 4224A(D), FOR MAKING, IN A DOCUMENT FILED WITH THE COMMISSIONER, A STATEMENT THAT WAS, AT THE TIME AND IN LIGHT OF THE CIRCUMSTANCES UNDER WHICH IT WAS MADE, INACCURATE AND, THEREFORE, MISLEADING IN A MATERIAL RESPECT.</p>
<b>Initiated By:</b>	VERMONT SECURITIES DIVISION
<b>Date Initiated:</b>	08/14/2002
<b>Docket/Case Number:</b>	DOCKET NO. 02-054-S
<b>URL for Regulatory Action:</b>	
<b>Principal Product Type:</b>	Other
<b>Other Product Type(s):</b>	BRIGHTON SECURITIES IS A BROKER-DEALER THAT SELLS BOTH EQUITY AND DEBT SECURITIES.
<b>Principal Sanction(s)/Relief Sought:</b>	Civil and Administrative Penalt(ies) /Fine(s)
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Consent



**Resolution Date:** 10/21/2002

**Sanctions Ordered:** Monetary/Fine \$10,000.00

**Other Sanctions Ordered:** NONE.

**Sanction Details:** A TOTAL ADMINISTRATIVE FINE OF \$10,000.00 WAS IMPOSED ON BRIGHTON SECURITIES FOR VIOLATIONS OF THE VERMONT SECURITIES ACT (\$5,000.00 PER VIOLATION). BRIGHTON SECURITIES SUBMITTED A CHECK TO THE DIVISION ON OCTOBER 25, 2002, AS REQUIRED BY THE CONSENT ORDER. THE DIVISION'S IMPOSITION OF AN ADMINISTRATIVE FINE WAS DONE PURSUANT TO 9 V.S.A. SECTION 4225A(B)(4) OF THE VERMONT SECURITIES ACT, CHAPTER 131.

**Regulator Statement** ALL RELEVANT INFORMATION IS DISCUSSED ABOVE. A COPY OF THE DIVISION'S CONSENT ORDER IS AVAILABLE UPON REQUEST. BRIGHTON SECURITIES NEITHER ADMITS NOR DENIES THE FINDINGS OF FACT OR CONCLUSIONS OF LAW CONTAINED IN THE ORDER, BUT CONSENTS TO THE ISSUANCE OF THE ORDER AND AGREES TO BE FULLY BOUND BY ITS TERMS AND CONDITIONS.

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** THIS IS THE LANGUAGE CONTAINED IN THE CONSENT ORDER: ON MAY 20, 2002, BRIGHTON SECURITIES SUBMITTED TO THE VERMONT SECURITIES DIVISION AN APPLICATION TO REGISTER AS A BROKER-DEALER. INCLUDED IN THE APPLICATION PACKAGE WAS AN AFFIDAVIT SIGNED BY GEORGE CONBOY, BRIGHTON'S PRESIDENT, BEFORE A NOTARY PUBLIC, WHICH STATED THAT BRIGHTON "BY OR THROUGH ANY OF ITS AGENTS HAS NOT OFFERED FOR SALE OR SOLD ANY SECURITIES, SOLICITED CLIENTS [OR] MAINTAINED ACCOUNTS...WITHIN THE STATE OF VERMONT." HOWEVER, AN INQUIRY BY THE DIVISION TO BRIGHTON'S CLEARING FIRM REVEALED THAT BRIGHTON SECURITIES HAD ACTAULLY MAINTAINED TWO ACCOUNTS FOR TWO SEPERATE VERMONT RESIDENTS SINCE JULY 22, 2000. ONE OF THOSE ACCOUNTS HAD GEORGE CONBOY LISTED AS THE SALES REPRESENTATIVE. THE INFORMATION PROVIDED BY THE CLEARING FIRM ALSO REVEALED THAT 19 NEW ACCOUNTS WERE TRANSFERRED TO BRIGHTON FROM ANOTHER FIRM BETWEEN JUNE 4, 2002 AND JUNE 6, 2002. BRIGHTON SECURITIES, HOWEVER, WAS NOT REGISTERED IN VERMONT UNTIL JUNE 27, 2002. AS SUCH BRIGHTON WAS FOUND TO BE IN VIOLATION OF 9 V.S.A. SECTION 4213(A) OF THE VERMONT SECURITIES ACT, CHAPTER 131, FOR TRANSACTING BUSINESS IN VERMONT AS AN UNREGISTERED BROKER-DEALER THROUGH UNREGISTERED SALES REPRESENTATIVES, AND 9 V.S.A. SECTION 4224A(D), FOR MAKING, IN A DOCUMENT FILED WITH THE COMMISSIONER,



A STATEMENT THAT WAS, AT THE TIME AND IN LIGHT OF THE CIRCUMSTANCES UNDER WHICH IT WAS MADE, INACCURATE AND, THEREFORE, MISLEADING IN A MATERIAL RESPECT.

**Initiated By:** VERMONT SECURITIES DIVISION

**Date Initiated:** 08/14/2002

**Docket/Case Number:** 02-054-S

**Principal Product Type:** No Product

**Other Product Type(s):** STATE

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

**Other Sanction(s)/Relief Sought:**

**Resolution:** Consent

**Resolution Date:** 10/21/2002

**Sanctions Ordered:** Monetary/Fine \$10,000.00

**Other Sanctions Ordered:**

**Sanction Details:** A TOTAL ADMINISTRATIVE FINE OF \$10,000.00 WAS IMPOSED ON BRIGHTON SECURITIES FOR VIOLATIONS OF THE VERMONT SECURITIES ACT (\$5,000.00 PER VIOLATION). BRIGHTON SECURITIES SUBMITTED A CHECK TO THE DIVISION ON OCTOBER 25, 2002, AS REQUIRED BY THE CONSENT ORDER. THE DIVISION'S IMPOSITION OF AN ADMINISTRATIVE FINE WAS DONE PURSUANT TO 9 V.S.A. SECTION 4225A(B)(4) OF THE VERMONT SECURITIES ACT, CHAPTER 131.

#### Firm Statement

THE ACTION RELATED TO THE APPLICATION BY BRIGHTON SECURITIES CORP. TO DO BUSINESS IN THE STATE OF VERMONT. VERMONT ALLEGED THAT BRIGHTON'S MAINTENANCE OF TWO ACCOUNTS FOR VERMONT RESIDENTS PRIOR TO THE APPLICATION DATE AND THE FAILURE OF THE APPLICATION TO DISCLOSE THE TWO ACCOUNTS VIOLATED VERMONT LAW. BRIGHTON WAS NOT MINDFUL OF THE TWO ACCOUNTS IN COMPLETING THE APPLICATION BECAUSE ONE HAD DONE ONLY A FEW UNSOLICITED ODD-LOT LIQUIDATIONS AND THE OTHER HAD BEEN INACTIVE FOR APPROXIMATELY 2 YEARS. VERMONT ALSO ALLEGED THAT THE TRANSFER OF 19 VERMONT ACCOUNTS TO BRIGHTON AFTER THE DATE OF ITS VERMONT APPLICATION, BUT BEFORE IT ACTUALLY BECAME EFFECTIVE VIOLATED VERMONT LAW. BRIGHTON CONSENTED TO THE FINE AND ADMINISTRATIVE ORDER TO CLOSE THIS MATTER.

**Disclosure 5 of 7**

**Reporting Source:** Regulator

**Current Status:** Final

**Allegations:**

**Initiated By:** NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

**Date Initiated:** 07/30/1971

**Docket/Case Number:** NY SC-197

**Principal Product Type:**

**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:**

**Other Sanction(s)/Relief Sought:**

**Resolution:** Consent

**Resolution Date:** 09/09/1971

**Sanctions Ordered:** Censure  
Monetary/Fine \$100.00

**Other Sanctions Ordered:**

**Sanction Details:**

**Regulator Statement** COMPLAINT NY SC-197 FILED 7/30/71  
SC ACCEPTED 8-10-71 WHEREIN RESPONDENTS ARE CENSURED AND  
FINED \$100  
TO BE FINAL: 9-9-71  
FINAL: PAID 8-12-71

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** DUE TO AGE OF RECORD, NO INFORMATION AVAILABLE AT THIS TIME

**Initiated By:** NASD

**Date Initiated:** 07/30/1971

**Docket/Case Number:** NY SC-197





**Principal Product Type:** No Product

**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:** Censure

**Other Sanction(s)/Relief Sought:**

**Resolution:** Consent

**Resolution Date:** 09/09/1971

**Sanctions Ordered:** Censure  
Monetary/Fine \$100.00

**Other Sanctions Ordered:** DUE TO AGE OF RECORD NO INFORMATION AVAILABLE AT THIS TIME

**Sanction Details:** COMPLAINT NY SC-197 FILED 7/30/71 SC ACCEPTED 8/10/71 WHEREIN RESPONDENTS ARE CENSURED AND FINED \$100 TO BE FINAL 9/9/71 PAID 8/12/71.

**Firm Statement** THIS WAS COPIED DIRECTLY FROM LEGACY RECORD NO FURTHER INFORMATION AVAILABLE AT THIS TIME.

COMPLAINT NY SC-197 FILED 7/30/71 SC ACCEPTED 8/10/71 WHEREIN RESPONDENTS ARE CENSURED AND FINED \$100 TO BE FINAL 9/9/71 PAID 8/12/71.

THIS WAS COPIED DIRECTLY FROM LEGACY RECORD NO FURTHER INFORMATION AVAILABLE AT THIS TIME.

#### Disclosure 6 of 7

**Reporting Source:** Regulator

**Current Status:** Final

**Allegations:**

**Initiated By:** NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

**Date Initiated:** 01/14/1972

**Docket/Case Number:** NY-1612

**Principal Product Type:**

**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:**


**Other Sanction(s)/Relief Sought:**

**Resolution:** Decision

**Resolution Date:** 08/27/1973

**Sanctions Ordered:** Monetary/Fine

**Other Sanctions Ordered:**

**Sanction Details:**

**Regulator Statement** COMPLAINT #NY-1612 FILED 01/14/72  
DECISION 08/27/73: FINAL FINED.  
FINES & COSTS: 08/13/73: PAID (FC# 5266)

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** NO INFORMATION AVAILABLE DUE TO AGE OF RECORD

**Initiated By:** NASD

**Date Initiated:** 01/14/1972

**Docket/Case Number:** NY-1612

**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:** LEGACY RECORD INDICATES A FINE BUT DOES NOT LIST AN AMOUNT. NO FURTHER INFORMATION AVAILABLE DUE TO AGE OF RECORD.

**Resolution:** Consent

**Resolution Date:** 08/27/1973

**Sanctions Ordered:** Monetary/Fine \$0.00

**Other Sanctions Ordered:** LEGACY RECORD INDICATES A FINE BUT DOES NOT LIST AN AMOUNT. NO FURTHER INFORMATION AVAILABLE DUE TO AGE OF RECORD.

**Sanction Details:** LEGACY RECORD INDICATES A FINE BUT DOES NOT LIST AN AMOUNT. NO FURTHER INFORMATION AVAILABLE DUE TO AGE OF RECORD.

**Firm Statement** THE FOLLOWING IS THE TOTAL DETAIL GIVEN BY THE LEGACY RECORD:



COMPLAINT #NY-1612 FILED 1/14/72 DECISION 8/27/73 FINAL. FINED. FINES  
& COSTS 8/13/73 PAID (FC#5266).

NO FURTHER INFORMATION AVAILABLE DUE TO AGE OF RECORD.

#### Disclosure 7 of 7

<b>Reporting Source:</b>	Regulator
<b>Current Status:</b>	Final
<b>Allegations:</b>	
<b>Initiated By:</b>	NEW YORK STOCK EXCHANGE
<b>Date Initiated:</b>	07/30/1971
<b>Docket/Case Number:</b>	NYSE-147
<b>Principal Product Type:</b>	
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Decision
<b>Resolution Date:</b>	09/09/1971
<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$100.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	
<b>Regulator Statement</b>	NYSE-147 FILED 07/30/71 DECISION 08/10/71 WHEREIN RESPONDENT IS CENSURED AND FINED \$100. TO BE FINAL 09/09/71. FINE PAID 08/12/71

<b>Reporting Source:</b>	Firm
<b>Current Status:</b>	Final
<b>Allegations:</b>	NO INFORMATION AVAILABLE DUE TO AGE OF RECORD.



<b>Initiated By:</b>	NYSE
<b>Date Initiated:</b>	07/30/1971
<b>Docket/Case Number:</b>	NYSE-147
<b>Principal Product Type:</b>	No Product
<b>Other Product Type(s):</b>	NO INFORMATION AVAILABLE DUE TO AGE OF RECORD.
<b>Principal Sanction(s)/Relief Sought:</b>	Censure
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Decision
<b>Resolution Date:</b>	09/09/1971
<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$100.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	NO INFORMATION AVAILABLE DUE TO AGE OF RECORD.
<b>Firm Statement</b>	FROM LEGACY RECORD: "NYSE-147 FILED 7/30/71 DECISION 8/10/71 WHEREIN RESPONDENT IS CENSURED AND FINED \$100. TO BE FINAL 9/9/71 FINE PAID 8/12/71." NO FURTHER INFORMATION AVAILABLE DUE TO AGE OF RECORD.



## Arbitration Award - Award / Judgment

Brokerage firms are not required to report arbitration claims filed against them by customers; however, BrokerCheck provides summary information regarding FINRA arbitration awards involving securities and commodities disputes between public customers and registered securities firms in this section of the report.

The full text of arbitration awards issued by FINRA is available at [www.finra.org/awardsonline](http://www.finra.org/awardsonline).

### Disclosure 1 of 1

<b>Reporting Source:</b>	Regulator
<b>Type of Event:</b>	ARBITRATION
<b>Allegations:</b>	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-SUITABILITY; NO OTHER CONTROVERSY INVOLVED
<b>Arbitration Forum:</b>	NASD
<b>Case Initiated:</b>	03/29/1995
<b>Case Number:</b>	<a href="#">95-00848</a>
<b>Disputed Product Type:</b>	NO OTHER TYPE OF SEC INVOLVE; OTHER TYPES OF SECURITIES
<b>Sum of All Relief Requested:</b>	\$190,000.00
<b>Disposition:</b>	AWARD AGAINST PARTY
<b>Disposition Date:</b>	03/27/1997
<b>Sum of All Relief Awarded:</b>	\$90,835.00

There may be a non-monetary award associated with this arbitration.  
Please select the Case Number above to view more detailed information.

**End of Report**



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