

BrokerCheck Report

HOLISTIC BROKERAGE, LLC

CRD# 46001

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

Please contact FINRA with any concerns.

About BrokerCheck®

BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.

- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

- **Where did this information come from?**

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
 - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
 - information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

• **Thank you for using FINRA BrokerCheck.**



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at brokercheck.finra.org



For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit www.finra.org.



HOLISTIC BROKERAGE, LLC

CRD# 46001

SEC# 8-51285

Main Office Location

800 BRICKELL AVE
SUITE 502
MIAMI, FL 33131
Regulated by FINRA Florida Office

Mailing Address

800 BRICKELL AVE
SUITE 502
MIAMI, FL 33131

Business Telephone Number

305-374-1177

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 Illinois on 08/28/1998.

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
- 21 U.S. states and territories

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

This firm conducts 12 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	3



Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Illinois on 08/28/1998.

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.

HOLISTIC BROKERAGE, LLC

Doing business as HOLISTIC BROKERAGE, LLC

CRD# 46001

SEC# 8-51285

Main Office Location

800 BRICKELL AVE
SUITE 502
MIAMI, FL 33131

Regulated by FINRA Florida Office

Mailing Address

800 BRICKELL AVE
SUITE 502
MIAMI, FL 33131

Business Telephone Number

305-374-1177



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): HOLISTIC WM HOLDINGS LLC

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

Position MANAGING MEMBER

Position Start Date 08/2014

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): FIGUEROA, ANGELIQUE ELIZABETH

3126583

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

Position CHIEF COMPLIANCE OFFICER/ANTI MONEY LAUNDERING COMPLIANCE OFFICER

Position Start Date 08/2023

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): MACIEL PERRONI, GONZALO EDUARDO

7319656

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

Position CEO/POO

Position Start Date 04/2022

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
<hr/>	
Legal Name & CRD# (if any):	TORRES, ANA MARIA 6415095
Is this a domestic or foreign entity or an individual?	Individual
Position	FINOP/PFO
Position Start Date	08/2019
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
<hr/>	



Firm Profile

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

Indirect Owners

Legal Name & CRD# (if any):	ALLONIA S.A.
Is this a domestic or foreign entity or an individual?	Foreign Entity
Company through which indirect ownership is established	COSMOS INVESTMENTS ASSETS LTD
Relationship to Direct Owner	OWNER
Relationship Established	04/2021
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):	EYVINDOR S.A.
Is this a domestic or foreign entity or an individual?	Foreign Entity
Company through which indirect ownership is established	ZENALIA INVESTMENT CORP
Relationship to Direct Owner	OWNER
Relationship Established	04/2021
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):	HB WM LIMITED
Is this a domestic or foreign entity or an individual?	Foreign Entity



Firm Profile

Indirect Owners (continued)

Company through which indirect ownership is established HOLISTIC WM HOLDINGS LLC

Relationship to Direct Owner OWNER

Relationship Established 04/2021

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): COSMOS INVESTMENTS ASSETS LTD

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

Company through which indirect ownership is established HB WM LIMITED

Relationship to Direct Owner OWNER

Relationship Established 04/2021

Percentage of Ownership 25% but less than 50%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): ZENALIA INVESTMENTS CORP

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

Company through which indirect ownership is established HB WM LIMITED

Relationship to Direct Owner OWNER

Relationship Established 04/2021

Firm Profile



Indirect Owners (continued)

Percentage of Ownership	25% but less than 50%
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.

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 21 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	03/16/1999

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	03/16/1999



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Arizona	Approved	01/20/2021
California	Approved	10/21/2020
Connecticut	Approved	04/03/2018
Delaware	Approved	09/28/2022
District of Columbia	Approved	08/15/2024
Florida	Approved	04/23/2013
Georgia	Approved	08/18/2023
Illinois	Approved	03/16/1999
Maryland	Approved	08/31/2023
Massachusetts	Approved	12/18/2024
New Jersey	Approved	08/08/2023
New York	Approved	10/20/2014
Ohio	Approved	01/27/2010
Pennsylvania	Approved	01/11/2024
South Carolina	Approved	08/30/2023
South Dakota	Approved	01/05/2023
Texas	Approved	01/19/2010
Utah	Approved	07/28/2023
Virgin Islands	Approved	12/06/2023
Virginia	Approved	02/19/2022
Wyoming	Approved	04/08/2021



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 12 types of businesses.

Types of Business

Broker or dealer retailing corporate equity securities over-the-counter
Broker or dealer selling corporate debt securities
Underwriter or selling group participant (corporate securities other than mutual funds)
Mutual fund retailer
U S. government securities broker
Municipal securities broker
Solicitor of time deposits in a financial institution
Put and call broker or dealer or option writer
Non-exchange member arranging for transactions in listed securities by exchange member
Trading securities for own account
Private placements of securities
Other - FOREIGN SOVEREIGN DEBT/STRUCTURED NOTES. COLLATERALIZED MORTGAGE OBLIGATIONS. CHAPERONE FOREIGN BROKER-DEALERS PURSUANT TO RULE 15A-6.

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 refer or introduce customers to other brokers and dealers.

Name:	PERSHING LLC
CRD #:	7560
Business Address:	ONE PERSHING PLAZA JERSEY CITY, NJ 07399
Effective Date:	03/06/2015
Description:	FIRM OPERATES UNDER A FULLY DISCLOSED CLEARING AGREEMENT AND CLEARS TRANSACTIONS WITH PERSHING.

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, 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.

HOLISTIC ADVISORS SA is under common control with the firm.

Business Address:	ZONAMERICA RUTA 8 KM. 17½ - EDIFICIO @ 2 OF. 304 MONTEVIDEO, URUGUAY
Effective Date:	04/13/2021
Foreign Entity:	Yes
Country:	URUGUAY
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	AFFILIATE IS OWNED BY SAME PARENT COMPANY/INDIRECT OWNER: HB WM LIMITED

HOLISTIC BROKERAGE INC is under common control with the firm.

Business Address:	50TH STEEET, F&F TOWER 28TH FLOOR, OFFICE 28D PANAMA CITY, PANAMA
Effective Date:	04/13/2021
Foreign Entity:	Yes
Country:	PANAMA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	AFFILIATE IS OWNED BY SAME PARENT COMPANY/INDIRECT OWNER: HB WM LIMITED

Firm Operations



Organization Affiliates (continued)

HOLISTIC ASSET MANAGEMENT, LLC is under common control with the firm.

CRD #:	156789
Business Address:	800 BRICKELL AVE SUITE 502 MIAMI, FL 33131
Effective Date:	11/02/2014
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	HOLISTIC ASSET MANAGEMENT, LLC IS UNDER COMMON CONTROL WITH HOLISTIC BROKERAGE LLC BY WAY OF ITS PARENT COMPANY, HOLISTIC WM HOLDINGS LLC.

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:**
 - 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 3

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 REPORT TRADE REPORTING AND COMPLIANCE ENGINE (TRACE)-ELIGIBLE SECURITIES TRANSACTIONS THAT THE FIRM EXECUTED DURING A PERIOD OF TIME. THE FINDINGS STATED THAT THE FIRM EXECUTED A WRITTEN AGREEMENT WITH ANOTHER FINRA-REGISTERED FIRM (REPORTING FIRM) REQUIRING THE REPORTING FIRM TO REPORT TRACE-ELIGIBLE TRANSACTIONS ON BEHALF OF THE FIRM. DUE TO AN OPERATIONAL ERROR, THE REPORTING FIRM DID NOT BEGIN REPORTING THOSE TRANSACTIONS WHEN IT WAS OBLIGATED TO DO UNDER THE AGREEMENT. THE FIRM LEARNED MONTHS LATER THAT ITS TRACE-ELIGIBLE SECURITY TRANSACTIONS WERE NOT BEING REPORTED. THE FINDINGS ALSO STATED THAT THE FIRM CREATED ORDER TICKETS INVOLVING DEBT SECURITIES TRANSACTIONS THAT FAILED TO CONTAIN ALL REQUIRED TIME STAMPS, INCLUDING TIME OF ORDER, TIME OF ENTRY AND TIME OF EXECUTION. THE FINDINGS ALSO INCLUDED THAT THE FIRM'S WRITTEN SUPERVISORY PROCEDURES DID NOT ADDRESS HOW THE FIRM WOULD FOLLOW UP WITH THE REPORTING FIRM TO ENSURE THAT TRACE-ELIGIBLE SECURITIES TRANSACTIONS WERE BEING PROPERLY REPORTED.
Initiated By:	FINRA
Date Initiated:	12/12/2014
Docket/Case Number:	2012030715601
Principal Product Type:	Other
Other Product Type(s):	UNSPECIFIED SECURITIES
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	12/12/2014
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 \$20,000.00

**Other Sanctions Ordered:**

Sanction Details: THE FIRM WAS CENSURED AND FINED \$20,000.

FINE PAID IN FULL ON JANUARY 2, 2015.

Reporting Source: Firm

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO REPORT TRADE REPORTING AND COMPLIANCE ENGINE (TRACE)-ELIGIBLE SECURITIES TRANSACTIONS THAT THE FIRM EXECUTED DURING A PERIOD OF TIME. THE FINDINGS STATED THAT THE FIRM EXECUTED A WRITTEN AGREEMENT WITH ANOTHER FINRA-REGISTERED FIRM (REPORTING FIRM) REQUIRING THE REPORTING FIRM TO REPORT TRACE-ELIGIBLE TRANSACTIONS ON BEHALF OF THE FIRM. DUE TO AN OPERATIONAL ERROR, THE REPORTING FIRM DID NOT BEGIN REPORTING THOSE TRANSACTIONS WHEN IT WAS OBLIGATED TO DO UNDER THE AGREEMENT. THE FIRM LEARNED MONTHS LATER THAT ITS TRACE-ELIGIBLE SECURITY TRANSACTIONS WERE NOT BEING REPORTED. THE FINDINGS ALSO STATED THAT THE FIRM CREATED ORDER TICKETS INVOLVING DEBT SECURITIES TRANSACTIONS THAT FAILED TO CONTAIN ALL REQUIRED TIME STAMPS, INCLUDING TIME OF ORDER, TIME OF ENTRY AND TIME OF EXECUTION. THE FINDINGS ALSO INCLUDED THAT THE FIRM'S WRITTEN SUPERVISORY PROCEDURES DID NOT ADDRESS HOW THE FIRM WOULD FOLLOW UP WITH THE REPORTING FIRM TO ENSURE THAT TRACE-ELIGIBLE SECURITIES TRANSACTIONS WERE BEING PROPERLY REPORTED.

Initiated By: FINRA

Date Initiated: 12/12/2014

Docket/Case Number: 2012030715601

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)



Resolution Date: 12/12/2014

Sanctions Ordered: Censure
Monetary/Fine \$20,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS FINED AND CENSURED \$20,000. FINE WAS PAID IN FULL ON 12/12/2014.

Disclosure 2 of 3

Reporting Source: Regulator

Current Status: Final

Allegations: MSRB RULE G-14 - LAKE FOREST SECURITIES LLC IMPROPERLY REPORTED INFORMATION TO THE REAL-TIME TRANSACTION REPORTING SYSTEM (RTRS). THE FIRM IMPROPERLY REPORTED PURCHASE AND SALE TRANSACTIONS EFFECTED IN MUNICIPAL SECURITIES TO THE RTRS WHEN THE INTER-DEALER DELIVERIES WERE STEP OUTS AND THUS WERE NOT INTER-DEALER TRANSACTIONS REPORTABLE TO THE RTRS.

Initiated By: FINRA

Date Initiated: 11/13/2012

Docket/Case Number: 2010025662601

Principal Product Type: Debt - Municipal

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 11/13/2012

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 \$6,000.00

**Other Sanctions Ordered:****Sanction Details:**

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED AND FINED \$6,000 FOR MSRB RULE VIOLATIONS. FINRA IMPOSED A LOWER FINE AFTER IT CONSIDERED, AMONG OTHER THINGS, THE FIRM'S REVENUES AND FINANCIAL RESOURCES. FINE PAID IN FULL ON 11/28/2012.

Reporting Source:

Firm

Current Status:

Final

Allegations:

MSRB RULE G-14 - LAKE FOREST SECURITIES LLC IMPROPERLY REPORTED INFORMATION TO THE REAL-TIME TRANSACTION REPORTING SYSTEM (RTRS). THE FIRM IMPROPERLY REPORTED PURCHASE AND SALE TRANSACTIONS EFFECTED IN MUNICIPAL SECURITIES TO THE RTRS WHEN THE INTER-DEALER DELIVERIES WERE STEP OUTS AND THUS WERE NOT INTER-DEALER TRANSACTIONS REPORTABLE TO THE RTRS.

Initiated By:

FINRA

Date Initiated:

11/13/2012

Docket/Case Number:

2010025662601

Principal Product Type:

Debt - Municipal

Other Product Type(s):**Principal Sanction(s)/Relief Sought:**

Censure

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

Acceptance, Waiver & Consent(AWC)

Resolution Date:

11/13/2012

Sanctions Ordered:

Censure
Monetary/Fine \$6,000.00

Other Sanctions Ordered:

N/A

Sanction Details:

TOTAL AMOUNT FINED IS \$6000.00. ALSO, THE FIRM WAS CENSURED.

Disclosure 3 of 3**Reporting Source:**

Regulator



Current Status: Final

Allegations: MSRB RULE G-14 AND MSRB RULE G-27- RESPONDENT FIRM FAILED TO ACCURATELY AND TIMELY REPORT MUNICIPAL SECURITIES INTER-DEALER TRANSACTIONS TO THE MSRB. THE FIRM FAILED TO PREPARE ADEQUATE WRITTEN SUPERVISORY PROCEDURES ADDRESSING THE REPORTING REQUIREMENTS UNDER MSRB RULE G-14.

Initiated By: NASD

Date Initiated: 11/09/2005

Docket/Case Number: E8A2005012501

Principal Product Type: Other

Other Product Type(s): MUNICIPAL SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 11/09/2005

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 \$5,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RESPONDENT FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, FIRM IS CENSURED AND FINED \$5,000.

Reporting Source: Firm

Current Status: Final

Allegations: FAILURE OF TIMELY REPORTING OF MUNICIPAL SECURITIES TO MSRB.

Initiated By: NASD



Date Initiated:	11/21/2005
Docket/Case Number:	E8A2005012501
Principal Product Type:	Debt - Municipal
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	\$5000.00 FINE
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	11/09/2005
Sanctions Ordered:	Censure Monetary/Fine \$5,000.00
Other Sanctions Ordered:	
Sanction Details:	MONETARY FINE AND CENSURE.

End of Report



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