

BrokerCheck Report

INSIGHT SECURITIES, INC.

CRD# 5611

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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

INSIGHT SECURITIES, INC.

CRD# 5611

SEC# 8-16247

Main Office Location

600 CENTRAL AVE SUITE 293 HIGHLAND PARK, IL 60035 Regulated by FINRA Chicago Office

Mailing Address

600 CENTRAL AVE SUITE 293 HIGHLAND PARK, IL 60035

Business Telephone Number

224-632-4700

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 Delaware on 11/12/1970. Its fiscal year ends in June.

Firm History

Information relating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

Firm Operations

This firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 52 U.S. states and territories

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:

Туре	Count
Regulatory Event	6
Arbitration	1
Bond	5

This firm is classified as a corporation.

This firm was formed in Delaware on 11/12/1970.

Its fiscal year ends in June.

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.

INSIGHT SECURITIES, INC.

Doing business as INSIGHT SECURITIES, INC.

CRD# 5611

SEC# 8-16247

Main Office Location

600 CENTRAL AVE SUITE 293 HIGHLAND PARK, IL 60035

Regulated by FINRA Chicago Office

Mailing Address

600 CENTRAL AVE SUITE 293 HIGHLAND PARK, IL 60035

Business Telephone Number

224-632-4700

Other Names of this Firm

Name	Where is it used
GWM PARTNERS	FL, TX
INSIGHT AMERICAS SECURITIES INC	FL, TX
MISSION GLOBAL PARTNERS	NJ, NY
PASSERELLE ADVISORS	FL, IL
PRECISE SECURITIES - DIVISION OF INSIGHT SECURITIES, INC.	CA, IL, TX



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): INTELLIGENICS, INC.

Is this a domestic or foreign entity or an individual?

Domestic Entity

Position HOLDING COMPANY/STOCKHOLDER

Position Start Date 07/2013

Percentage of Ownership 75% or more

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

No

Is this a public reporting company?

No

Legal Name & CRD# (if any):

GAAFAR, OMAR JAMES

4916775

Is this a domestic or foreign entity or an individual?

Individual

Position

COO

Position Start Date

04/2020

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):

KIM, JAMES J

6040592

Is this a domestic or foreign entity or an individual?

Individual

Position CCO

Position Start Date 04/2020

User Guidance

Direct Owners and Executive Officers (continued)

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of No

the firm?

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

LEGASPY, CARLOS JAVIER

2148751

Is this a domestic or foreign entity or an individual?

Individual

Position

PRINCIPAL, PRESIDENT, CEO

Position Start Date

04/2020

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of

the firm?

Is this a public reporting

company?

No

Yes

Legal Name & CRD# (if any):

MAKULA, MICHAEL JOSEPH MR.

4643441

Is this a domestic or foreign entity or an individual?

Individual

Position

CFO. FINOP

Position Start Date

04/2020

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

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



Indirect Owners

Legal Name & CRD# (if any): LEGASPY, CARLOS JAVIER

2148751

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is established

INTELLIGENICS, INC.(HOLDING COMPANY)

Relationship to Direct Owner

SHAREHOLDER

Relationship Established

09/2019

Percentage of Ownership

50% but less than 75%

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

Yes

Is this a public reporting

company?

established

No

Legal Name & CRD# (if any):

BANCO SAN JUAN INTERNACIONAL INC

Is this a domestic or foreign entity or an individual?

Domestic Entity

Company through which indirect ownership is

INTELLIGENICS, INC.(HOLDING COMPANY)

Relationship to Direct Owner

SHAREHOLDER

Relationship Established

10/2022

Percentage of Ownership

25% but less than 50%

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

No

Is this a public reporting

No

company?

Firm History

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

FINCA

No information reported.

FIDC

Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is currently registered with the SEC, 1 SRO and 52 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	02/12/1971

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	02/23/1971





U.S. States & Territories	Status	Date Effective
Alabama	Approved	07/28/1998
Alaska	Approved	03/11/1996
Arizona	Approved	07/12/1990
Arkansas	Approved	06/08/1999
California	Approved	07/12/1985
Colorado	Approved	06/11/1990
Connecticut	Approved	03/14/1996
Delaware	Approved	09/29/1998
District of Columbia	Approved	04/22/1999
Florida	Approved	08/05/1988
Georgia	Approved	01/02/1996
Hawaii	Approved	08/12/1996
Idaho	Approved	07/10/1996
Illinois	Approved	01/21/1971
Indiana	Approved	05/26/1988
lowa	Approved	03/21/1996
Kansas	Approved	04/17/1996
Kentucky	Approved	02/15/1999
Louisiana	Approved	07/06/1999
Maine	Approved	08/10/2000
Maryland	Approved	02/15/1996
Massachusetts	Approved	03/13/1996
Michigan	Approved	05/27/1988
Minnesota	Approved	07/03/1996
Mississippi	Approved	05/18/1999
Missouri	Approved	07/02/1996
Montana	Approved	06/25/1996
Nebraska	Approved	04/04/1996
Nevada	Approved	10/09/1992
New Hampshire	Approved	09/22/2000
New Jersey	Approved	01/03/2000
New Mexico	Approved	06/04/1998
New York	Approved	05/31/1988

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	10/06/1998
North Dakota	Approved	03/06/2001
Ohio	Approved	05/05/1994
Oklahoma	Approved	03/13/1997
Oregon	Approved	07/11/1996
Pennsylvania	Approved	10/08/1996
Puerto Rico	Approved	11/17/2015
Rhode Island	Approved	03/22/1999
South Carolina	Approved	11/01/1999
South Dakota	Approved	03/12/1996
Tennessee	Approved	03/04/1993
Texas	Approved	01/01/1992
Utah	Approved	08/07/1997
Vermont	Approved	09/05/2000
Virginia	Approved	09/23/1996
Washington	Approved	08/27/1996
West Virginia	Approved	05/27/1999
Wisconsin	Approved	10/29/1992
Wyoming	Approved	08/03/2000

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

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

Mutual fund retailer

U S. government securities broker

Municipal securities broker

Broker or dealer selling variable life insurance or annuities

Put and call broker or dealer or option writer

Investment advisory services

Broker or dealer selling tax shelters or limited partnerships in primary distributions

Trading securities for own account





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: AXOS CLEARING LLC

CRD #: 117176

Business Address: 1200 LANDMARK CENTER

SUITE 800

OMAHA, NE 68102

Effective Date: 06/01/2020

Description: ON A FULLY DISCLOSED CLEARING ARRANGEMENT.

Name: INTERACTIVE BROKERS LLC

CRD #: 36418

Business Address: ONE PICKWICK PLAZA

2ND FLOORS

GREENWICH, CT 06830

Effective Date: 03/06/2020

Description: ON A FULLY DISCLOSED CLEARING ARRANGEMENT.

Industry Arrangements



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

Name: AXOS CLEARING LLC

CRD #: 117176

Business Address: 1200 LANDMARK CENTER

SUITE 800

OMAHA, NE 68102

Effective Date: 06/01/2020

Description: TRADING RECORDS OF INDIVIDUAL ACCOUNTS ARE KEPT BY AXOS

CLEARING, LLC ON A FULL DISCLOSED BASIS. AXOS CLEARING, LLC

PROVIDES THE MONTHLY STATEMENT FOR THESE ACCOUNTS.

Name: INTERACTIVE BROKERS LLC

CRD #: 36418

Business Address: ONE PICKWICK PLAZA

2ND FLOORS

GREENWICH, CT 06830

Effective Date: 03/06/2020

Description: TRADING RECORDS OF INDIVIDUAL ACCOUNTS ARE KEPT BY

INTERACTIVE BROKERS, LLC ON A FULL DISCLOSED BASIS.

INTERACTIVE BROKERS. LLC PROVIDES THE MONTHLY STATEMENT

FOR THESE ACCOUNTS.

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

Name: AXOS CLEARING LLC

CRD #: 117176

Business Address: 1200 LANDMARK CENTER

SUITE 800

OMAHA, NE 68102

Effective Date: 06/01/2020

Description: ALL FUNDS AND ACCOUNTS OF THE APPLICANT ARE MAINTAINED BY

AXOS CLEARING, LLC.

Name: INTERACTIVE BROKERS LLC

CRD #: 36418

Industry Arrangements (continued)

Business Address: ONE PICKWICK PLAZA

2ND FLOORS

GREENWICH, CT 06830

Effective Date: 03/06/2020

Description: ALL FUNDS AND ACCOUNTS OF THE APPLICANT ARE MAINTAINED BY

INTERACTIVE BROKERS, LLC.

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

Name: AXOS CLEARING LLC

CRD #: 117176

Business Address: 1200 LANDMARK CENTER

SUITE 800

OMAHA, NE 68102

Effective Date: 06/01/2020

Description: ALL ACCOUNTS, FUNDS AND SECURITIES OF CUSTOMERS ARE HELD

AND MAINTAINED BY AXOS CLEARING, LLC ON A FULLY DISCLOSED

BASIS.

Name: INTERACTIVE BROKERS LLC

CRD #: 36418

Business Address: ONE PICKWICK PLAZA

2ND FLOORS

GREENWICH, CT 06830

Effective Date: 03/06/2020

Description: ALL ACCOUNTS, FUNDS AND SECURITIES OF CUSTOMERS ARE HELD

AND MAINTAINED BY INTERACTIVE BROKERS, LLC ON A FULLY

DISCLOSED BASIS.

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

FINCA

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.

PRECISE INVESTMENT MANAGEMENT, INC. is under common control with the firm.

CRD #: 282557

Business Address: 401 EAST MAIN DRIVE

SUITE #407

EL PASO, TX 79901

Effective Date: 09/24/2019

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities:

Yes

Description: INTELLIGENICS INC., THE HOLDING COMPANY FOR INSIGHT SECURITIES,

INC ALSO OWNS PRECISE INVESTMENT MANAGEMENT. INC.

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	6	0
Arbitration	N/A	1	N/A
Bond	N/A	5	N/A



Disclosure Event Details

What you should know about reported disclosure events:

- BrokerCheck provides details for any disclosure event that was reported in CRD. It also includes summary information regarding FINRA arbitration awards in cases where the brokerage firm was named as a respondent.
- 2. Certain thresholds must be met before an event is reported to CRD, for example:
 - A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
- 3. Disclosure events in BrokerCheck reports come from different sources:
 - Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
- 4. There are different statuses and dispositions for disclosure events:
 - o A disclosure event may have a status of pending, on appeal, or final.
 - A "pending" event involves allegations that have not been proven or formally adjudicated.
 - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" event has been concluded and its resolution is not subject to change.
 - o A final event generally has a disposition of adjudicated, settled or otherwise resolved.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally involves an agreement by the parties to resolve the matter.
 Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
- 5. You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.

Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

Disclosure 1 of 6

Reporting Source: Regulator

Current Status: Final



Allegations: 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 INSIGHT SECURITIES, INC. ("INSIGHT" OR "RESPONDENT"). IN ANTICIPATION OF THE INSTITUTION OF THESE PROCEEDINGS, RESPONDENT SUBMITTED AN OFFER OF SETTLEMENT (THE "OFFER") WHICH THE COMMISSION HAS DETERMINED TO ACCEPT. THE COMMISSION FINDS THAT THIS MATTER INVOLVES FAILURES BY INSIGHT, A REGISTERED INVESTMENT ADVISER, TO COMPLY WITH AMENDMENTS TO ADVISERS ACT RULE 206(4)-1 THAT THE COMMISSION ADOPTED IN DECEMBER 2020 (THE "AMENDED MARKETING RULE"). FROM NOVEMBER 4, 2022, THE COMPLIANCE DEADLINE FOR THE AMENDED MARKETING RULE, THROUGH JUNE 8, 2023 (THE "RELEVANT PERIOD"),

WEBSITE WITHOUT ADOPTING AND IMPLEMENTING POLICIES AND PROCEDURES REASONABLY DESIGNED TO ENSURE THAT THE

INSIGHT ADVERTISED HYPOTHETICAL PERFORMANCE ON ITS PUBLIC

HYPOTHETICAL PERFORMANCE WAS RELEVANT TO THE LIKELY FINANCIAL SITUATION AND INVESTMENT OBJECTIVES OF THE INTENDED AUDIENCE. AS A RESULT OF ITS CONDUCT, INSIGHT WILLFULLY VIOLATED SECTION

206(4) OF THE ADVISERS ACT AND RULE 206(4)-1(D) THEREUNDER.

Initiated By: UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Date Initiated: 04/12/2024

Docket/Case Number: 3-21909

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Cease and Desist

Yes

Other Sanction(s)/Relief

Sought:

Resolution: Order

Resolution Date: 04/12/2024

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or

deceptive conduct?

Sanctions Ordered: Censure

Monetary/Fine \$20,000.00



Cease and Desist/Injunction

Other Sanctions Ordered: UNDERTAKINGS

Sanction Details: THE FIRM IS ORDERED TO CEASE AND DESIST FROM COMMITTING OR

CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION

206(4) OF THE ADVISERS ACT AND RULE 206(4)-1 THEREUNDER, IS

CENSURED, SHALL COMPLY WITH THE UNDERTAKINGS ENUMERATED IN

THE ORDER, AND SHALL PAY A CIVIL MONEY PENALTY OF \$20,000.

Regulator Statement AS A RESULT OF ITS CONDUCT, INSIGHT WILLFULLY VIOLATED SECTION

206(4) OF THE ADVISERS ACT AND RULE 206(4)-1(D) THEREUNDER.

ACCORDINGLY, IT IS HEREBY ORDERED THAT RESPONDENT CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY

FUTURE VIOLATIONS OF SECTION 206(4) OF THE ADVISERS ACT AND RULE

206(4)-1 THEREUNDER, IS CENSURED, SHALL COMPLY WITH THE

UNDERTAKINGS ENUMERATED IN THE ORDER, AND SHALL PAY A CIVIL

MONEY PENALTY OF \$20,000.

Reporting Source: Firm

Current Status: Final

Allegations: THE SECURITIES AND EXCHANGE COMMISSION ("COMMISSION") DEEMS IT

APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC

ADMINISTRATIVE AND

CEASEAND-DESIST PROCEEDINGS BE, AND HEREBY ARE, INSTITUTED AGAINST INSIGHT SECURITIES, INC. ("INSIGHT" OR "RESPONDENT"). IN

ANTICIPATION OF

THE INSTITUTION OF THESE PROCEEDINGS, RESPONDENT SUBMITTED AN OFFER OF SETTLEMENT (THE "OFFER") WHICH THE COMMISSION HAS

DETERMINED TO

ACCEPT. THE COMMISSION FINDS THAT THIS MATTER INVOLVES FAILURES BY INSIGHT, A REGISTERED INVESTMENT ADVISER, TO COMPLY WITH

AMENDMENTS TO

ADVISERS ACT RULE 206(4)-1 THAT THE COMMISSION ADOPTED IN DECEMBER 2020 (THE "AMENDED MARKETING RULE"). FROM NOVEMBER

4. 2022. THE

COMPLIANCE DEADLINE FOR THE AMENDED MARKETING RULE, THROUGH

JUNE 8, 2023 (THE "RELEVANT PERIOD"), INSIGHT ADVERTISED

HYPOTHETICAL

PERFORMANCE ON ITS PUBLIC WEBSITE WITHOUT ADOPTING AND

IMPLEMENTING POLICIES AND PROCEDURES REASONABLY DESIGNED TO

ENSURE THAT THE

HYPOTHETICAL PERFORMANCE WAS RELEVANT TO THE LIKELY FINANCIAL SITUATION AND INVESTMENT OBJECTIVES OF THE INTENDED AUDIENCE.



AS A RESULT OF

ITS CONDUCT, INSIGHT WILLFULLY VIOLATED SECTION 206(4) OF THE

ADVISERS ACT AND RULE 206(4)-1(D) THEREUNDER

Initiated By: UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Date Initiated: 04/12/2024

Docket/Case Number: 3-21909

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Cease and Desist

Other Sanction(s)/Relief

Sought:

Resolution: Order

Resolution Date: 04/12/2024

Sanctions Ordered: Censure

> Monetary/Fine \$20,000.00 Cease and Desist/Injunction

Other Sanctions Ordered: **UNDERTAKINGS**

Sanction Details: THE FIRM IS ORDERED TO CEASE AND DESIST FROM COMMITTING OR

> CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 206(4) OF THE ADVISERS ACT AND RULE 206(4)-1 THEREUNDER, IS CENSURED. SHALL COMPLY WITH THE UNDERTAKINGS ENUMERATED IN THE ORDER, AND SHALL PAY A CIVIL MONEY PENALTY OF \$20,000.

Firm Statement THE FIRM ACKNOWEDGED, RECOGNIZED AND ADDRESSSED THE

VIOLATION OF SECTION 206(4) OF THE ADVISERS ACT AND RULE 206(4)-1

(MARKETING RULE), THE

FIRM WAS CENSURED, REQUIRED TO PAY A CIVIL MONEY PENALTY OF \$20,000 AND COMPLY WITH CERTAIN UNDERTAKINGS AND ORDRED TO

CEASE & DESIST FROM

COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS

OF THE MARKETING RULE.

Disclosure 2 of 6

Reporting Source: Regulator

Current Status: Final

WITHOUT ADMITTING OR DENYING THE FINDINGS. THE FIRM CONSENTED Allegations:



TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WSPS, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH ITS SUITABILITY OBLIGATIONS IN CONNECTION WITH INVERSE AND LEVERAGED EXCHANGE TRADED FUNDS OR NOTES (NON-TRADITIONAL EXCHANGE TRADED PRODUCTS OR NT-ETPS). THE FINDINGS STATED THAT ALTHOUGH THE FIRM WAS AWARE OF THE COMPLEX NATURE OF NT-ETPS. IT PERMITTED ITS REPRESENTATIVES TO OFFER THE PRODUCTS TO RETAIL CUSTOMERS ON A SOLICITED BASIS WITHOUT HAVING IN PLACE A SUPERVISORY SYSTEM TO REASONABLY MONITOR THOSE TRANSACTIONS. FIRM REGISTERED REPRESENTATIVES SOLICITED PURCHASES OF NT-ETPS, TOTALING \$23.9 MILLION, AND SALES OF NT-ETPS, TOTALING \$24.5 MILLION, IN RETAIL CUSTOMER BROKERAGE ACCOUNTS. NONE OF THE CUSTOMERS WHO HELD POSITIONS FOR MORE THAN A WEEK SOLD THE POSITIONS AT A LOSS. THE FIRM DID NOT MONITOR THE HOLDING PERIODS OF ITS CUSTOMERS' POSITIONS IN NT-ETPS, NOR DID ITS WSPS REQUIRE SUPERVISORS TO CONDUCT SUCH MONITORING. INSTEAD, THE FIRM RELIED ON SUPERVISORS TO CONDUCT A MANUAL BLOTTER REVIEW TO DETECT POTENTIALLY UNSUITABLE NT-ETP TRANSACTIONS. THE FIRM'S BLOTTER REVIEW. HOWEVER. DID NOT PROVIDE SUPERVISORS WITH INFORMATION ON HOW LONG THE CUSTOMERS HELD THE PRODUCTS. THE FIRM FAILED TO REASONABLY MONITOR NT-ETP HOLDING PERIODS DESPITE HAVING TWICE BEEN WARNED BY FINRA THAT ITS SUPERVISORY SYSTEMS WERE DEFICIENT IN FAILING TO CONDUCT SUCH MONITORING. IN RESPONSE TO THE FIRST WARNING. THE FIRM REPRESENTED TO FINRA THAT IT WOULD IMMEDIATELY CEASE SOLICITING TRADES IN NT-ETPS YET CONTINUED TO SOLICIT THE PRODUCTS.

Initiated By: FINRA

Date Initiated: 01/12/2023

Docket/Case Number: 2021071926701

Principal Product Type: Other

Other Product Type(s): NON-TRADITIONAL EXCHANGE TRADED PRODUCTS

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 01/12/2023

Does the order constitute a No



final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or

deceptive conduct?

Sanctions Ordered: Censure

Monetary/Fine \$25,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$25,000. FINE PAID IN FULL ON

FEBRUARY 16, 2023.

Reporting Source: Firm

Current Status: Final

Allegations: WITHOUT ADMITING OR DENYING THE FINDINGS, THE FIRM CONSENTED

TO THE SANCTIONS AND ENTRY OF FINDINGS THAT INSIGHT SECURITIES DID NOT HAVE A SYSTEM IN PLACE TO REASONABLY ASSURE THAT SOLICITED TRADES IN LEVERAGED AND INVERSE ETFS AND ETNS WERE

NOT HELD BY CLIENT LONGER THAN ONE TRADING SESSION

Initiated By: FINRA

Date Initiated: 12/16/2022

Docket/Case Number: 2021071926701

Principal Product Type: Other

Other Product Type(s): ETF AND ETN

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 01/12/2023

Sanctions Ordered: Censure

Monetary/Fine \$25,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$25,000



Disclosure 3 of 6

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 CAPTURE, REVIEW, AND RETAIN THOUSANDS OF BUSINESS-RELATED ELECTRONIC COMMUNICATIONS SENT AND RECEIVED THROUGH ITS REPRESENTATIVES' PERSONAL CELLULAR TELEPHONES VIA AN INSTANT MESSAGING APPLICATION. THE FINDINGS STATED THAT THE FIRM'S WRITTEN PROCEDURES PROHIBITED THE USE OF INSTANT MESSAGES FOR BUSINESS PURPOSES UNLESS THE FIRM GRANTED AN INDIVIDUAL PERMISSION TO USE THEM. IF PERMISSION WERE GRANTED TO ANY INDIVIDUAL, THE FIRM'S PROCEDURES WOULD HAVE OBLIGATED IT TO CAPTURE THAT INDIVIDUAL'S INSTANT MESSAGES AND REVIEW AND RETAIN THEM, CONSISTENT WITH THE FIRM'S PROCEDURES RELATED TO THE REVIEW AND RETENTION OF EMAIL COMMUNICATIONS. HOWEVER, THE FIRM NEVER GRANTED ANYONE PERMISSION TO SEND OR RECEIVE INSTANT MESSAGES FOR BUSINESS PURPOSES. NONETHELESS, THE FIRM HAD NO PROCEDURES TO ENSURE THAT ITS REPRESENTATIVES

CAPTURING, REVIEWING, OR RETAINING BUSINESS RELATED

COMMUNICATIONS SENT OR RECEIVED VIA INSTANT MESSAGE. IN FACT,

WERE COMPLYING WITH THIS PROHIBITION AND NO PROCEDURES FOR

THE FIRM WAS AWARE THAT MULTIPLE REPRESENTATIVES WERE

COMMUNICATING WITH THEIR CUSTOMERS VIA AN INSTANT MESSAGING APP AND THAT THESE COMMUNICATIONS WERE OFTEN BUSINESS-RELATED. YET, THE FIRM FAILED TO TAKE ANY ACTION TO EITHER STOP THIS PRACTICE OR CAPTURE, REVIEW, AND RETAIN BUSINESS-RELATED COMMUNICATIONS SENT OR RECEIVED IN THIS MANNER. AS A RESULT, THE FIRM FAILED TO CAPTURE, REVIEW, OR RETAIN MORE THAN 10,000 BUSINESS-RELATED INSTANT MESSAGES SENT OR RECEIVED BY TWENTY DIFFERENT FIRM REPRESENTATIVES. THE MESSAGES WERE BUSINESS-RELATED IN THAT THEY INCLUDED INFORMATION ABOUT CUSTOMERS' ACCOUNTS, INVESTMENTS, OR OTHER ASPECTS OF THE FIRM'S

SECURITIES BUSINESS.

Initiated By: FINRA

Date Initiated: 06/10/2022

Docket/Case Number: 2018059661001

Principal Product Type:

No Product

Other Product Type(s):



Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 06/10/2022

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or

No

deceptive conduct?
Sanctions Ordered:

Censure

Monetary/Fine \$50,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$50,000. FINRA CONSIDERED,

AMONG OTHER THINGS, THE FIRM'S SIZE AND FINANCIAL RESOURCES IN

DETERMINING THIS FINE. FINE PAID IN FULL ON AUGUST 30, 2023.

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 THE FIRM

RETENTION AND REVIEW OF INSTANT MESSAGING FAILED TO BE

ADEQUATE

Initiated By: FINRA

Date Initiated: 04/29/2022

Docket/Case Number: 2018059661001

Principal Product Type:

No Product

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:



Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 06/10/2022

Sanctions Ordered: Censure

Monetary/Fine \$50,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$50,000

Firm Statement INSIGHT SECURITIES CONTINUALLY WORKS TO IDENTIFY AND MITIGATE

RISK THROUGHOUT THE FIRM. IN A REVIEW OF ITS POLICIES, IT WAS

DISCOVERED THAT SOME MEMBERS OF THE FIRM HAD BEEN

COMMUNICATING WITH CLIENTS USING INSTANT MESSAGING. THE FIRM BEGAN MONITORING INSTANT MESSAGING IN 2019 AND HAS ALSO ASKED FOR AND RECEIVED THE HISTORICAL MESSAGES BETWEEN FIRM AND CLIENT IN ORDER TO ENSURE THAT THE BOOKS AND RECORDS ARE

COMPLETE.

THROUGHOUT THE FIRM'S 51-YEAR HISTORY, THERE HAVE BEEN NO OTHER POTENTIAL ISSUES BROUGHT BY REGULATORS IN REGARDS TO COMMUNICATION. AS SUCH, THE FIRM BELIEVES THAT THIS IS AN ISOLATED INCIDENT WHICH WAS RECTIFIED BY THE FIRM NEARLY THREE

YEARS BEFORE THIS REGULATOR RESPONSE. THE FIRM WILL

CONTINUALLY MONITOR AND TEST ITS POLICIES AND PROCEDURES TO

ENSURE THAT EACH IS APPROPRIATE AND EFFECTIVE.

Disclosure 4 of 6

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 THE FIRM'S PRICING OF CORPORATE BOND TRANSACTIONS TRADED FOR ITS OWN ACCOUNT FAILED TO BE FAIR. THE FINDINGS STATED THAT THE FIRM FAILED TO TAKE INTO CONSIDERATION ALL RELEVANT CIRCUMSTANCES, INCLUDING MARKET CONDITIONS WITH RESPECT TO EACH BOND AT THE TIME OF THE TRANSACTION, THE EXPENSE INVOLVED, AND THE FACT THAT THE FIRM WAS ENTITLED TO A PROFIT. SOME OF THE TRADES INVOLVED MARK-UPS OR MARK-DOWNS GREATER THAN FIVE PERCENT. THE FOREGOING CONDUCT WAS LIMITED TO ONE BRANCH OFFICE OF

THE FIRM AND STEMMED FROM INSUFFICIENT TRAINING.

Initiated By: FINRA

Date Initiated: 10/17/2019



Docket/Case Number: 2016052226801

Principal Product Type:

Debt - Corporate

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/17/2019

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 \$30,000.00

Other Sanctions Ordered:

NO RESTITUTION IS PROVIDED FOR IN THE AWC AS THE FIRM ALREADY

PAID RESTITUTION TO THE AFFECTED CUSTOMERS.

Sanction Details:

THE FIRM WAS CENSURED AND FINED \$30,000. FINES PAID IN FULL ON

NOVEMBER 4, 2019.

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 THE FIRM'S PRICING OF CORPORATE BOND TRANSACTIONS TRADED FOR ITS OWN ACCOUNT FAILED TO BE FAIR. THE FINDINGS STATED THAT THE FIRM FAILED TO TAKE INTO CONSIDERATION ALL RELEVANT CIRCUMSTANCES, INCLUDING MARKET CONDITIONS WITH RESPECT TO EACH BOND AT THE TIME OF THE TRANSACTION, THE EXPENSE INVOLVED, AND THE FACT THAT THE FIRM WAS ENTITLED TO A PROFIT. SOME OF THE TRADES INVOLVED MARK-UPS OR MARK-DOWNS GREATER THAN FIVE PERCENT. THE FOREGOING CONDUCT WAS LIMITED TO ONE BRANCH OFFICE OF

THE FIRM AND STEMMED FROM INSUFFICIENT TRAINING.

Initiated By: FINRA



Date Initiated: 10/17/2019

Docket/Case Number: 2016052226801

Principal Product Type:

Debt - Corporate

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/17/2019

Sanctions Ordered: Censure

Monetary/Fine \$30,000.00

Other Sanctions Ordered: NO RESTITUTION IS PROVIDED FOR IN THE AWC AS THE FIRM ALREADY

PAID RESTITUTION TO THE AFFECTED CUSTOMERS.

Sanction Details: THE FIRM WAS CENSURED AND FINED \$30,000.

Firm Statement INSIGHT SECURITIES CONTINUALLY WORKS TO IDENTIFY AND MITIGATE

RISK THROUGHOUT THE FIRM. AS SUCH, THE INDIVIDUALS LOCATED

WITHIN THIS BRANCH HAVE ALL BEEN ORDERED TO COMPLETE

ADDITIONAL TRAINING TO ENSURE THAT A SIMILAR INSTANCE DOES NOT OCCUR AGAIN. RESTITUTION HAD ALREADY BEEN PAID TO THE AFFECTED CLIENTS ONCE WE BECAME AWARE OF THIS ISSUE. THE FIRM BELIEVES

THIS TO BE AN ISOLATED INCIDENT AND FIRM POLICIES AND PROCEDURES HAVE ALREADY BEEN PUT INTO EFFECT AND WILL CONTINUALLY BE SUBJECT TO RISK ASSESSMENTS TO ENSURE THAT

POLICY'S AND PROCEDURES REMAIN APPROPRIATE.

Disclosure 5 of 6

Reporting Source: Regulator

Current Status: Final

Allegations: FINRA RULE 6730(A): THE MEMBER FIRM FAILED TO ACCURATELY REPORT

SOME TRANSACTIONS TO THE TRADE REPORTING AND COMPLIANCE ENGINE (TRACE) THAT WERE TRACE-ELIGIBLE TRANSACTIONS. IN EACH

OF THE INACCURATELY REPORTED TRANSACTIONS, THE FIRM

IMPROPERLY BUNCHED TRANSACTIONS TOGETHER. FOR EXAMPLE, IN ONE INSTANCE, THE FIRM REPORTED THE SALE OF 250 BONDS AS ONE TRANSACTION WHEN THE FIRM SHOULD HAVE REPORTED IT AS TWO SEPARATE TRANSACTIONS: THE SALE OF 150 BONDS TO ONE CUSTOMER



AND THE SALE OF 100 BONDS TO A DIFFERENT CUSTOMER.

Initiated By: FINRA

Date Initiated: 07/03/2013

Docket/Case Number: 2011025849901

Principal Product Type: Other
Other Product Type(s): BONDS

Principal Sanction(s)/Relief

Sought:

Other

Other Sanction(s)/Relief

Sought:

N/A

Resolution: Acceptance, Waiver & Consent(AWC)

Nο

Resolution Date: 07/03/2013

Does the order constitute a

final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or

deceptive conduct?

Sanctions Ordered: Monetary/Fine \$5,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED

TO THE DESCRIBED SANCTION AND TO THE ENTRY OF FINDINGS:

THEREFORE THE FIRM IS FINED \$5,000.

Reporting Source: Firm

Current Status: Final

Allegations: FINRA RULE 6730(A): THE MEMBER FIRM FAILED TO ACCURATELY REPORT

SOME TRANSACTIONS TO THE TRADE REPORTING AND COMPLIANCE ENGINE (TRACE) THAT WERE TRACE-ELIBGIBLE TRANSACTIONS. IN EACH

OF THE INACCURATELY REPORTED TRANSACTIONS, THE FIRM

IMPROPERLY BUNCHED TRANSACTIONS TOGETHER. FOR EXAMPLE, IN

ONE INSTANCE, THE FIRM REPORTED IT AS TWO SEPARATE

TRANSACTIONS: THE SALE OF 150 BONDS TO ONE CUSTOMER AND THE

SALE OF 100 BONDS TO A DIFFERENT CUSTOMER.

Initiated By: FINANCIAL INDUSTRY REGULATORY AUTHORITY



Date Initiated: 07/03/2013

Docket/Case Number: 2011025849901

Principal Product Type: Other
Other Product Type(s): BONDS
Principal Sanction(s)/Relief Other

Sought:

Other Sanction(s)/Relief

Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 07/03/2013

Sanctions Ordered: Monetary/Fine \$5,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED

TO THE DESCRIBED SANCTION AND TO THE ENTRY OF FINDINGS;

THEREFORE THE FIRM IS FINED \$5000.

Disclosure 6 of 6

Reporting Source: Regulator

Current Status: Final

Allegations: SEC RULE 17A-3, NASD RULES 2110, 3110, 6230 - RESPONDENT MEMBER

FAILED TO ACCURATELY OR TIMELY REPORT TRACE-ELIGIBLE SECURITIES TO THE TRADE REPORTING AND COMPLIANCE ENGINE (TRACE). THE FINDINGS STATED THAT THE FIRM FAILED TO PREPARE APPROPRIATE ORDER TICKETS FOR TRACE ELIGIBLE CORPORATE DEBT SECURITIES.

Initiated By: NASD

Date Initiated: 03/13/2007

Docket/Case Number: E8A2005010802

Principal Product Type: Debt - Corporate

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

Sought:

Other Sanction(s)/Relief

Sought:



Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 03/13/2007

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or

No

deceptive conduct?

Sanctions Ordered: Censure

Monetary/Fine \$7,500.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, HORWITZ &

> ASSOCIATES INC., CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE, THE FIRM IS CENSURED AND

FINED \$7,500.

Reporting Source: Firm **Current Status:**

Allegations: SEC RULE 17A-3, NASD RULES 2110,3110,6230 - HORWITZ & ASSOCATES,

> INC. FAILED TO ACCURATELY OR TIMELY REPORT TRACE-ELIGIBLE SECURITIES TO THE TRADE REPORTING AND COMPLIANCE ENGINE

(TRACE).

Final

Initiated By: NASD

Date Initiated: 03/13/2007

Docket/Case Number: E8A2005010802

Principal Product Type: Debt - Corporate

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Acceptance, Waiver & Consent(AWC) Resolution:

Resolution Date: 03/13/2007 **Sanctions Ordered:** Censure



Monetary/Fine \$7,500.00

Other Sanctions Ordered:

Sanction Details: PAID \$7500.00 ON 3-15-2007

Firm Statement WITHOUT ADMITTING OR DENYING THE FINDINGS, HORWITZ &

ASSOCIATES INC., CONSENTED TO THE DESCRIBED SANCTIONS AND TO

THE ENTRY OF FINDINGS.



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.

Disclosure 1 of 1

Reporting Source: Regulator

Type of Event: ARBITRATION

Allegations: ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-

SUITABILITY; ACCOUNT ACTIVITY-UNAUTHORIZED TRADING; ACCOUNT

RELATED-BREACH OF CONTRACT

Arbitration Forum: NASD

Case Initiated:

Case Number: 88-00246

Disputed Product Type: NO OTHER TYPE OF SEC INVOLVE; OPTIONS

Sum of All Relief Requested: \$46,422.76

Disposition: AWARD AGAINST PARTY

Disposition Date: 05/11/1989

Sum of All Relief Awarded: \$13,650.15

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



Civil Bond

This type of disclosure event involves a civil bond for the brokerage firm that has been denied, paid, or revoked by a bonding company.

Disclosure 1 of 5

Reporting Source: Firm

Policy Holder: INSIGHT SECURITIES

Bonding Company Name: NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH

Disposition: Payout

Disposition Date: 06/30/2021

Payout Details: 300,000 APPROX JULY 20TH, 2021

Firm Statement THE PAYOUT WAS FROM A SETTLEMENT THAT INSIGHT BORE IN REGARDS

TO 18-02781 AND 19-00137. THE FIDELITY BOND WAS REIMBURSING

INSIGHT

Disclosure 2 of 5

Reporting Source: Firm

Policy Holder: INSIGHT SECURITIES

Bonding Company Name: ILLINOIS UNION INSURANCE COMPANY

Disposition: Payout

Disposition Date: 02/24/2021

Payout Details: \$240,000 USD PAID OUT ON OR ABOUT MARCH 24TH, 2021

Firm Statement THE INSURANCE COMPANY ELECTED TO SETTLE TWO RELATED CASES

(18-02781 AND 19-00137) RATHER THAN PROCEED WITH ARBITRATION. INSIGHT WAS DISMISSED FROM BOTH CASES AND NO FINDINGS OR

JUDGEMENTS WERE LEVIED

Disclosure 3 of 5

Reporting Source: Firm

Policy Holder: INSIGHT SECURITIES

Bonding Company Name: ILLINOIS UNION INSURANCE COMPANY

Disposition: Payout

Disposition Date: 11/09/2020



Payout Details: INSURANCE COMPANY PAID 810,000 USD ON OR ABOUT 12/9/2020

Firm Statement THIS WAS A SETTLEMENT IN THE ARBITRATION CASE 19-00474. NO

JUDGEMENT WAS RENDERED, RATHER THE INSURANCE COMPANY ELECTED TO SETTLE THE CASE BEFORE THE CASE WAS FINISHED. NO

WRONGDOING WAS FOUND.

Disclosure 4 of 5

Reporting Source: Firm

Policy Holder: INSIGHT SECURITIES

Bonding Company Name: CHUBB

Disposition: Payout

Disposition Date: 06/05/2020

Payout Details: CHUBB PAID 525,000 ON OR ABOUT JULY 5, 2020

Firm Statement THIS WAS A SETTLEMENT IN THE ARBITRATION CASE 18-02934 (ARMIJOS

ET AL VS INSIGHT SECUTITIES) NO JUDGEMENT WAS RENDERED, RATHER THE INSURANCE COMPANY ELECTED TO SETTLE THE CASE BEFORE THE

CASE WAS FINISHED. NO WRONGDOING WAS FOUND.

Disclosure 5 of 5

Reporting Source: Firm

Policy Holder: INSIGHT SECURITIES

Bonding Company Name: CHUBB

Disposition: Payout

Disposition Date: 11/27/2019

PAYOUT AMOUNT WAS 375,000 USD. PAYOUT WAS MADE ON OR ABOUT

DEC 27TH 2019

Firm Statement THIS WAS A SETTLEMENT IN THE ARBITRATION CASE 18-02176. NO

JUDGEMENT WAS RENDERED, RATHER THE INSURANCE COMPANY ELECTED TO SETTLE THE CASE BEFORE THE CASE WAS FINISHED. NO

WRONGDOING WAS FOUND.

www.finra.org/brokercheck

End of Report



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