



BrokerCheck Report

ROONEY, PACE INC.

CRD# 6218

Report # 555470 generated on Thursday, June 28, 2007.

Dear Investor:

FINRA has generated the following BrokerCheck report for **ROONEY, PACE INC.**. The information contained within this report has been provided by a FINRA brokerage firm(s) and securities regulators as part of the securities industry's registration and licensing process and represents the most current information reported to the Central Registration Depository (CRD®).

FINRA regulates the securities markets for the ultimate benefit and protection of the investor. FINRA believes the general public should have access to information that will help them determine whether to conduct, or continue to conduct, business with a FINRA member. To that end, FINRA has adopted a public disclosure policy to make certain types of information available to you. Examples of information FINRA provides include: regulatory actions, investment-related civil suits, customer disputes that contain allegations of sales practice violations against brokers, all felony charges and convictions, misdemeanor charges and convictions relating to securities violations, and financial events such as bankruptcies, compromises with creditors, judgments, and liens.

When evaluating this report, please keep in mind that it may include items that involve pending actions or allegations that may be contested and have not been resolved or proven. Such items may, in the end, be withdrawn or dismissed, or resolved in favor of the individual broker, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

The information in this report is not the only resource you should consult. FINRA recommends that you learn as much as possible about the individual broker or firm from other sources, such as professional references, local consumer and investment groups, or friends and family members who already have established investment business relationships.

FINRA BrokerCheck is governed by federal law, Securities and Exchange Commission (SEC) regulations and FINRA rules approved by the SEC. State disclosure programs are governed by state law, and may provide additional information on brokers licensed by the state. Therefore, you should also consider requesting information from your state securities regulator. Refer to www.nasaa.org for a complete list of state securities regulators.

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.](http://www.finra.org)

ROONEY, PACE INC.

CRD# 6218

SEC# 8-17107

Main Office Location

Mailing Address

Report Summary for this Firm

This firm is no longer registered with FINRA. The firm's registration with FINRA was terminated (e.g., voluntarily withdrawn, cancelled, liquidated, expelled) prior to August 1999 when the enhanced Central Registration Depository System (i.e. Web CRD®) was implemented. As a result, since the firm was not required to update its CRD record via the submission of an electronic Form BD filing to Web CRD, FINRA's BrokerCheck program contains only limited information about this firm.

Firm Profile

This firm is classified as CORPORATION.

This firm was formed in Nevada on 9/1/1978.

Its fiscal year ends in Unknown.

Firm Operations

This firm is no longer registered with FINRA.

Disclosure of Arbitration Awards, Disciplinary and Regulatory Events

This section includes details regarding disclosure events reported by or about this firm to CRD as part of the securities industry registration and licensing process. Examples of such disclosure events range from disciplinary actions initiated by regulators to certain criminal charges and/or convictions, to financial disclosures such as bankruptcies, and summary information regarding arbitration awards involving securities and commodities disputes between public customers and FINRA-registered firms.



Firm Profile

This firm is classified as a CORPORATION.

This firm was formed in Nevada on 9/1/1978.

Its fiscal year ends in Unknown.

Firm Names and Locations

This section includes details, as reported by the firm on Form BD, regarding the firm's full legal name, business and mailing addresses, the firm's "doing business as" name (i.e. "DBA" name) if different from the full legal name, and any other name by which the firm conducts business and where such name is used.

ROONEY, PACE INC.

Doing business as ROONEY, PACE INC.

CRD# 6218

SEC# 8-17107

Main Office Location

Mailing Address

Business Telephone Number

212 980-6040



Firm Profile

This section provides information relating to Direct Owners and Executive Officers as reported by the firm on Form BD.

Direct Owners and Executive Officers

Information not available – see Summary Page.



Firm Profile

This section provides information relating to Indirect Owners, if any, as reported by the firm on Form BD.

Indirect Owners

Information not available – see Summary Page.



Firm History

This section provides information relating to successions (e.g. mergers or acquisitions), if any, as reported by the firm on Form BD.

Information not available – see Summary Page.



Firm Operations

Registrations

This section provides information about the regulators (e.g. U.S. Securities and Exchange Commission (SEC), self-regulatory organizations, states and U.S. territories) the firm is currently registered with, the category of each registration, and the date on which the registration status became effective, as well as certain information about the firm's SEC registration.

This firm is no longer registered with FINRA.

The firm's registration with FINRA was from 5/30/1972 to 12/4/1987.

SEC Registration Questions

This firm was registered with the SEC as:

A broker-dealer only: **Information not available – see Summary Page.**

A broker-dealer and government securities broker or dealer: No

A government securities broker or dealer only: No

The firm has ceased activity as a government securities broker or dealer: No



Types of Business

This section provides the types of business and any other business or other non-securities business the firm is engaged in or is expected to be engaged in as reported by the firm on Form BD.

This firm conducted 9 types of business.

Exchange member engaged in exchange commission business other than floor activities	Yes
Exchange member engaged in floor activities	Yes
Broker or dealer making inter-dealer markets in corporate securities over-the-counter	Yes
Broker or dealer retailing corporate equity securities over-the-counter	Yes
Broker or dealer selling corporate debt securities	No
Underwriter or selling group participant (corporate securities other than mutual funds)	Yes
Mutual fund underwriter or sponsor	No
Mutual fund retailer	No
U.S. government securities dealer	No
U.S. government securities broker	No
Municipal securities dealer	Yes
Municipal securities broker	Yes
Broker or dealer selling variable life insurance or annuities	No
Solicitor of time deposits in a financial institution	No
Real estate syndicator	No
Broker or dealer selling oil and gas interests	No
Put and call broker or dealer or option writer	Yes
Broker or dealer selling securities of only one issuer or associate issuers (other than mutual funds)	No
Broker or dealer selling securities of non-profit organizations (e.g., churches, hospitals)	No
Investment advisory services	No
Broker or dealer selling tax shelters or limited partnerships in primary distributions	Yes
Broker or dealer selling tax shelters or limited partnerships in the secondary market	No
Non-exchange member arranging for transactions in listed securities by exchange member	No
Trading securities for own account	No
Private placements of securities	No
Broker or dealer selling interests in mortgages or other receivables	No
Broker or dealer involved in a networking kiosk or similar arrangement with a bank, savings bank or association, or credit union	No
Broker or dealer involved in a networking kiosk or similar arrangement with a Insurance company or agency	No



Other Types of Business

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

This firm does not engage in other non-securities business.



Clearing Arrangements

Information not available – see Summary Page

Introducing Arrangements

Information not available – see Summary Page

Industry Arrangements

Information not available – see Summary Page

Organization Affiliates

Information not available – see Summary Page



Disclosure of Arbitration Awards, Disciplinary and Regulatory Events

Firms are required to answer a series of disclosure questions on Form BD and provide the corresponding details to any reported events as part of the securities industry registration and licensing process. The disclosure questions concern criminal and regulatory events, civil actions, and certain financial disclosures such as bankruptcy or liquidation proceedings filed within the past ten years, bond actions and unpaid judgments and liens. The firm must answer either "yes" or "no" to each question as it applies to the firm itself or to any of its control affiliates (i.e., an individual, partnership, corporation, trust, or other organization that directly or indirectly controls, is under common control with, or is controlled by the firm). This section lists the various disclosure questions and their corresponding answers as reported by the firm on Form BD.



Possible multiple reporting sources – please note:

Disclosure event details may be reported by more than one source (i.e., regulator or firm). When this occurs, all versions of the reported event will appear in the firm's BrokerCheck report.



Disclosure Event Details

This section provides the specific details for each disclosure event, as reported by the firm on Form BD, that correspond with any "yes" answers to the various Form BD disclosure questions. It also includes summary information regarding arbitration awards in cases where the firm was named as a respondent in the arbitration proceeding, if any.

Nothing will be displayed in this section of the firm's BrokerCheck Report when the firm has no reported disclosure information.

If the firm does have reported disclosure events, please keep the following in mind when evaluating the disclosure event details. Items may involve pending actions or allegations that may be contested and have not been resolved or proven. The items may, in the end, be withdrawn or dismissed, or resolved in favor of the firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to CRD by the firm and/or by securities industry regulators. Some of the specific data fields contained in this section of the report may be blank if the information was not provided to CRD.

Disclosure event details may be reported by more than one source (i.e., regulator and firm). When this occurs, all versions of the reported event will appear in the firm's BrokerCheck report.



Regulatory - Final

This section provides information regarding any final, regulatory action as reported by the firm and/or a securities regulator to CRD as part of the securities industry registration and licensing process. Such event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a self-regulatory organization, a federal regulator such as the U.S. Securities and Exchange Commission (SEC) or the Commodity Futures Trading Commission (CFTC), or a foreign financial regulatory body) for a violation of investment-related rules or regulations. In addition, a revocation or suspension of the authority of a firm's control affiliate to act as an attorney, accountant or federal contractor, if any, will appear here.

Disclosure

Reporting Source: REGULATOR (U6)

Current Status: FINAL

Allegations:

Initiated By: OKLAHOMA

Date Initiated:

Docket/Case Number:

Principal Product Type:

Other Product Type(s):

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

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

Resolution: SUSPENSION

Resolution Date: 10/28/1985

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: FORM U-6 RECEIVED DISCLOSES: OKLAHOMA SECURITIES COMMISSION SUSPENDED ROONEY, PACE, INC. THROUGH 8/31/86 FOR FAILURE TO DISCLOSE MATERIAL FACTS TO PURCHASERS OF SECURITIES AS WELL AS MISSTATEMENTS OF MATERIAL FACTS. THE COMPANY ALSO FAILED TO OBSERVE STANDARDS OF ETHICAL PRACTICE FOR BROKER-DEALERS AND IN



PARTICULAR FAILED TO SUPERVISE THE ACTIVITIES OF FOUR AGENTS IN THE OKLAHOMA CITY OFFICE. ADEQUATE RECORDS WERE NOT KEPT AND MAINTAINED AS REQUIRED BY THE OKLAHOMA SECURITIES ACT.



Regulatory - Final

This section provides information regarding any final, regulatory action as reported by the firm and/or a securities regulator to CRD as part of the securities industry registration and licensing process. Such event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a self-regulatory organization, a federal regulator such as the U.S. Securities and Exchange Commission (SEC) or the Commodity Futures Trading Commission (CFTC), or a foreign financial regulatory body) for a violation of investment-related rules or regulations. In addition, a revocation or suspension of the authority of a firm's control affiliate to act as an attorney, accountant or federal contractor, if any, will appear here.

Disclosure

Reporting Source: REGULATOR (U6)

Current Status: FINAL

Allegations:

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

Date Initiated:

Docket/Case Number:

Principal Product Type:

Other Product Type(s):

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

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

Resolution: SUSPENSION

Resolution Date: 8/14/1974

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: SUSPENDED FROM MEMBERSHIP FOR FAILURE TO COMPLY WITH FORMAL WRITTEN REQUESTS FOR INFORMATION. THE SUSPENSION COMMENCED AUGUST 14, 1974 AND CONCLUDED AUGUST 16, 1974.



Regulatory - Final

This section provides information regarding any final, regulatory action as reported by the firm and/or a securities regulator to CRD as part of the securities industry registration and licensing process. Such event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a self-regulatory organization, a federal regulator such as the U.S. Securities and Exchange Commission (SEC) or the Commodity Futures Trading Commission (CFTC), or a foreign financial regulatory body) for a violation of investment-related rules or regulations. In addition, a revocation or suspension of the authority of a firm's control affiliate to act as an attorney, accountant or federal contractor, if any, will appear here.

Disclosure

Reporting Source: REGULATOR (U6)

Current Status: FINAL

Allegations:

Initiated By: AMERICAN STOCK EXCHANGE

Date Initiated:

Docket/Case Number:

Principal Product Type:

Other Product Type(s):

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

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

Resolution: CENSURE

Resolution Date: 6/28/1985

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: AMERICAN STOCK EXCHANGE WEEKLY BULLETIN, JUNE 28, 1985 (REC'D 7/2/85): ROONEY, PACE INC. WAS DISCIPLINED FOR VIOLATING IN 1982: EXCHANGE RULE 921(c) BY FAILING TO SEEK TO OBTAIN CERTAIN REQUIRED INFORMATION IN CONNECTION WITH THE APPROVAL OF 15 NATURAL PERSON CUSTOMER OPTIONS ACCOUNTS OR TO NOTE SAID CUSTOMERS' REFUSAL TO PROVIDE



SUCH INFORMATION WHERE APPLICABLE; AND EXCHANGE RULE 922(a) BY FAILING TO DILIGENTLY SUPERVISE AND REVIEW 20 CUSTOMER OPTIONS ACCOUNTS FOR THE COMPATIBILITY OF OPTIONS TRANSACTIONS WITH THE TYPES OF TRANSACTIONS FOR WHICH SAID ACCOUNTS HAD BEEN APPROVED AND FAILING TO DEVELOP, IMPLEMENT AND ENFORCE A WRITTEN SUPERVISORY PROGRAM PERTAINING TO ITS PUBLIC OPTIONS BUSINESS. ROONEY WAS CENSURED, FINED \$10,000 AND REQUIRED TO PROVIDE THE EXCHANGE WITH WRITTEN PROCEDURES WHICH IDENTIFY ITS SUPERVISORY PERSONNEL AND THEIR RESPECTIVE FUNCTIONS AND RESPONSIBILITIES. ROONEY SETTLED THE CHARGES WITHOUT ADMITTING OR DENYING THE EXCHANGE'S ALLEGATIONS.



Regulatory - Final

This section provides information regarding any final, regulatory action as reported by the firm and/or a securities regulator to CRD as part of the securities industry registration and licensing process. Such event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a self-regulatory organization, a federal regulator such as the U.S. Securities and Exchange Commission (SEC) or the Commodity Futures Trading Commission (CFTC), or a foreign financial regulatory body) for a violation of investment-related rules or regulations. In addition, a revocation or suspension of the authority of a firm's control affiliate to act as an attorney, accountant or federal contractor, if any, will appear here.

Disclosure

Reporting Source: REGULATOR (U6)

Current Status: FINAL

Allegations:

Initiated By: ILLINOIS

Date Initiated:

Docket/Case Number:

Principal Product Type:

Other Product Type(s):

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

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

Resolution: REVOCATION

Resolution Date: 6/29/1987

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: FORM U-6 RECEIVED 6/17/85 DISCLOSES: RESPONDENT ROONEY PACE, INC. WITHOUT ADMITTING OR DENYING VIOLATIONS OF SECTIONS 5, 12.A AND 12.I OF THE ILLINOIS SECURITIES LAW OF 1953, AS AMENDED AGREED TO AN ORDER OF CENSURE AND TO PLACE \$49,000 PLUS INTEREST IN ESCROW PENDING RESOLUTION OF LITIGATION BETWEEN ROONEY PACE, INC., PATRICK



FORKIN AND JACK YAEGER. CASE NO. 84-77, DATED JUNE 7, 1985.
***** 7/16/87-AMENDED FORM U6 (8036-19087) DISCLOSES
RESPONDENT ROONEY PACE, INC.'S REGISTRATION AS A DEALER IN THE
STATE OF ILLINOIS WAS REVOKED FOR VIOLATION OF THE AMENDED CONSENT
ORDER OF CENSURE ENTERED JUNE 7, 1985. SAID REVOCATION ORDERED
PURSUANT TO SECTION 8.E(1)(g) OF THE ILLINOIS SECURITIES LAW OF 1953, AS
AMENDED. DOCKET/CASE NO. 84-77, DATED JUNE 29, 1987.



Regulatory - Final

This section provides information regarding any final, regulatory action as reported by the firm and/or a securities regulator to CRD as part of the securities industry registration and licensing process. Such event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a self-regulatory organization, a federal regulator such as the U.S. Securities and Exchange Commission (SEC) or the Commodity Futures Trading Commission (CFTC), or a foreign financial regulatory body) for a violation of investment-related rules or regulations. In addition, a revocation or suspension of the authority of a firm's control affiliate to act as an attorney, accountant or federal contractor, if any, will appear here.

Disclosure

Reporting Source: REGULATOR (U6)

Current Status: FINAL

Allegations:

Initiated By: SECURITIES AND EXCHANGE COMMISSION

Date Initiated:

Docket/Case Number:

Principal Product Type:

Other Product Type(s):

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

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

Resolution:

Resolution Date: 11/13/1986

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: SEC NEWS DIGEST, ISSUE 84-38, 02/24/1984: SEC ORDERED PUBLIC ADMINISTRATIVE PROCEEDINGS UNDER SECTIONS 15(B) AND 19(H) OF THE SECURITIES EXCHANGE ACT OF 1934 (?34) AGAINST ROONEY, PACE INC. (THE FIRM), RANDOLPH K. PACE, RICHARD NAGER AND JAMES E. COHEN. THE ORDER FOR PROCEEDINGS ALLEGES THAT FROM ABOUT 10/1/81 TO 11/30/81,



ALL RESPONDENTS WILFULLY VIOLATED THE ANTIFRAUD PROVISIONS OF THE FEDERAL SECURITIES LAWS IN THE OFFER, PURCHASE AND SALE OF UNITS OF SEQUENTIAL INFORMATION SYSTEMS, INC. IN THAT THE REGISTRANT AND PACE, ACTING AS UNDERWRITERS FOR A \$3 MILLION BEST EFFORTS 12 MILLION UNITS ALL OR NONE OFFERING OF SEQUENTIAL, CLOSED THE OFFERING BEFORE ALL CUSTOMER PURCHASE PRICE PAYMENTS HAD BEEN RECEIVED; ALL RESPONDENTS DISTRIBUTED SEQUENTIAL UNITS THROUGH NON-BONA-FIDE TRANSACTION; PACE, NAGER AND COHEN MISREPRESENTED AND FAILED TO DISCLOSE MATERIAL FACTS RELATING TO THE PROPRIETY OR ADVISABILITY OF INVESTING IN SEQUENTIAL UNITS. REGISTRANT AND PACE WILFULLY VIOLATED WILFULLY AIDED AND ABETTED VIOLATIONS OF SECTION 10(B) OF THE EXCHANGE ACT AND RULE 10B-9 THEREUNDER IN THAT REGISTRANT AND PACE, FROM ABOUT 10/5/81 TO ABOUT 10/14/81, REPRESENTED TO INVESTORS THAT ALL SEQUENTIAL UNITS WOULD BE SOLD TO, AND PAID FOR, BY BONA-FIDE PURCHASERS BY 10/14/81, THE EXPIRATION DATE OF THE OFFERING AND THAT REFUNDS TO PURCHASERS WOULD BE MADE IF ALL THE UNITS WERE NOT SOLD AND PAID FOR BY THIS DATE. REGISTRANT WILFULLY VIOLATED AND PACE WILFULLY VIOLATED AND WILFULLY AIDED AND ABETTED VIOLATIONS OF SECTION 15(C)(2) OF THE EXCHANGE ACT AND RULE 15c2-4 THEREUNDER IN THAT THEY FAILED TO PROMPTLY TRANSMIT AND DEPOSIT CUSTOMER FUNDS IN A SEPARATE BANK ACCOUNT AND TO TRANSMIT OR RETURN SUCH FUNDS TO THE PERSONS ENTITLED THERETO WHEN THE COMPLETE ISSUE WAS NOT SOLD, FROM ABOUT 10/14/81 TO ABOUT 11/30/81, REGISTRANT AND PACE VIOLATED SECTIONS 7 AND 11(D)(1) OF THE EXCHANGE ACT AND REGULATION T THEREUNDER IN THAT THEY ARRANGED FOR THE EXTENSION AND MAINTENANCE OF CREDIT TO AND FOR CUSTOMERS WHO PURCHASED SEQUENTIAL UNITS IN THE INITIAL OFFERING THEREOF; AND FROM ABOUT 10/1/81 TO 11/30/81 ROONEY, PACE AND PACE FAILED REASONABLY TO SUPERVISE NAGER AND COHEN, PERSONS SUBJECT TO THEIR SUPERVISION WITH A VIEW TO PREVENTING VIOLATIONS OF THE ANTIFRAUD PROVISIONS DISCUSSED ABOVE. A HEARING WILL BE SCHEDULED TO DETERMINE THE VALIDITY OF THESE ALLEGATIONS. (REL. 34-20689) **** SEC NEWS DIGEST, ISSUE 85-106, JUNE 3, 1985 (REC'D 6/5/85): AN ADMINISTRATIVE LAW JUDGE ISSUED AN INITIAL DECISION IN PROCEEDINGS RESPECTING ROONEY, PACE INC., AND RANDOLPH PACE. THE DECISION PROHIBITS THE FIRM FOR TWO MONTHS FROM ENTERING INTO ANY UNDERWRITING COMMITMENTS AND FOR AN ADDITIONAL FOUR MONTHS FROM ENTERING INTO AN UNDERWRITING COMMITMENT INVOLVING A CONDITIONAL OFFERING. PACE IS SUSPENDED FROM ASSOCIATION WITH A BROKER-DEALER FOR THREE MONTHS. THESE SANCTIONS WERE BASED ON FINDINGS THAT THE FIRM AND PACE VIOLATED



THE ANTIFRAUD PROVISIONS IN A 1981 "BEST EFFORTS ALL OR NONE" OFFERING OF SECURITIES OF SEQUENTIAL INFORMATION SYSTEMS. THE INITIAL DECISION IS SUBJECT TO COMMISSION REVIEW ON PETITION OF A PARTY OR ON THE COMMISSION'S OWN INITIATIVE. *****11-22-86 SEC NEWS DIGEST, ISSUE 86-219, DATED 11/13/86: THE COMMISSION IMPOSED SANCTIONS ON ROONEY, PACE INC., A NEW YORK CITY BROKERAGE FIRM, AND ITS PRESIDENT RANDOLPH K. PACE. THE FIRM WAS PROHIBITED FROM MAKING ANY NEW UNDERWRITING COMMITMENT, AS UNDERWRITER OR SELLING GROUP MEMBER, FOR TWO MONTHS, AND FROM MAKING ANY COMMITMENT INVOLVING AN "ALL OR NONE" OR OTHER CONDITIONAL OFFERING FOR SIX MONTHS, THE PROHIBITIONS TO RUN CONCURRENTLY. PACE WAS SUSPENDED FROM ASSOCIATION WITH ANY BROKER OR DEALER FOR THREE MONTHS. THE SANCTIONS ARE EFFECTIVE 11/24/86. IN OCTOBER 1981, THE FIRM WAS UNDERWRITER OF AN "ALL OR NONE," BEST EFFORTS OFFERING OF 12 MILLION UNITS (CONSISTING OF COMMON STOCK AND WARRANTS) OF SEQUENTIAL INFORMATION SYSTEMS, INC. THE PROSPECTUS PROVIDED THAT, UNLESS ALL OF THE SECURITIES WERE SOLD BY 10/14/81, INVESTORS' MONEY WOULD BE REFUNDED. THE COMMISSION FOUND THAT RESPONDENTS FRAUDULENTLY TREATED THE OFFERING AS SUCCESSFULLY COMPLETED ALTHOUGH ALL OF THE UNITS HAD NOT BEEN SOLD IN A BONA FIDE TRANSACTIONS BY THAT DATE. IT ALSO FOUND THAT RESPONDENTS MADE FRAUDULENT REPRESENTATIONS TO CUSTOMERS WHO PURCHASED SHARES OF THE OFFERING. IN IMPOSING SANCTIONS, THE COMMISSION REITERATED ITS COMMITMENT TO VIGOROUS ENFORCEMENT "WHERE THE FACADE OF A SUCCESSFUL OFFERING IS CREATED IN DEORATION OF RESPONSIBILITIES OWED TO THE PUBLIC INVESTORS." (REL. 34-23763). ***** 9/10/87-SEC NEWS DIGEST ISSUE 87-171, DATED SEPTEMBER 9, 1987 DISCLOSES: IN OCTOBER 1986, THE COMMISSION IMPOSED SANCTIONS ON ROONEY, PACE INC., AND ITS PRESIDENT, RANDOLPH K. PACE. THE FIRM WAS PROHIBITED FROM MAKING ANY NEW UNDERWRITING COMMITMENT, AS UNDERWRITER OR SELLING GROUP MEMBER, FOR TWO MONTHS, AND FROM MAKING ANY COMMITMENT INVOLVING AN "ALL OR NONE" OR OTHER CONDITIONAL OFFERING FOR SIX MONTHS, THE PROHIBITIONS TO RUN CONCURRENTLY. PACE WAS SUSPENDED FROM ASSOCIATION WITH ANY BROKER OR DEALER FOR THREE MONTHS. THE RESPONDENTS' SANCTIONS WERE STAYED PENDING APPEAL. ON AUGUST 18, THE COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT DISMISSED THE APPEAL BASED ON THE STIPULATION OF THE PARTIES. ACCORDINGLY, THE COMMISSION HAS MADE RESPONDENTS' SANCTIONS EFFECTIVE AS OF SEPTEMBER 14. (REL. 34-24874).



Regulatory - Final

This section provides information regarding any final, regulatory action as reported by the firm and/or a securities regulator to CRD as part of the securities industry registration and licensing process. Such event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a self-regulatory organization, a federal regulator such as the U.S. Securities and Exchange Commission (SEC) or the Commodity Futures Trading Commission (CFTC), or a foreign financial regulatory body) for a violation of investment-related rules or regulations. In addition, a revocation or suspension of the authority of a firm's control affiliate to act as an attorney, accountant or federal contractor, if any, will appear here.

Disclosure

Reporting Source: REGULATOR (U6)

Current Status: FINAL

Allegations:

Initiated By: ILLINOIS

Date Initiated:

Docket/Case Number:

Principal Product Type:

Other Product Type(s):

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

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

Resolution: ORDER

Resolution Date: 7/20/1984

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: FILE NO. 84-77, IN THE MATTER OF ROONEY PACE, INC. ORDER OF CONTINUANCE. THE PROCEEDING HAVING COME FOR PUBLIC HEARING ON 7/18/84 FOR RESPONDENT TO DETERMINE WHETHER AN ORDER SHOULD BE ENTERED PROHIBITING RESPONDENT FROM SELLING OR OFFERING FOR SALE



SECURITIES IN THE STATE OF ILLINOIS.



Regulatory - Final

This section provides information regarding any final, regulatory action as reported by the firm and/or a securities regulator to CRD as part of the securities industry registration and licensing process. Such event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a self-regulatory organization, a federal regulator such as the U.S. Securities and Exchange Commission (SEC) or the Commodity Futures Trading Commission (CFTC), or a foreign financial regulatory body) for a violation of investment-related rules or regulations. In addition, a revocation or suspension of the authority of a firm's control affiliate to act as an attorney, accountant or federal contractor, if any, will appear here.

Disclosure

Reporting Source: REGULATOR (U6)

Current Status: FINAL

Allegations:

Initiated By: SECURITIES AND EXCHANGE COMMISSION

Date Initiated:

Docket/Case Number:

Principal Product Type:

Other Product Type(s):

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

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

Resolution: ORDER

Resolution Date: 2/7/1983

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: SEC NEWS DIGEST, FEBRUARY 7, 1983, ISSUE 83-26. THE COMMISSION HAS ACCEPTED AN OFFER OF SETTLEMENT FROM ROONY PACE AND PACE, WHEREBY THEY CONSENTED TO THE ENTRY OF AN ORDER THAT BETWEEN JULY 1978 AND MARCH 1979, THE RESPONDENTS FAILED TO REASONABLY SUPERVISE A PERSON SUBJECT TO THEIR SUPERVISION WITH A VIEW



TOWARDS PREVENTING VIOLATIONS OF THE SECURITIES LAWS IN CONNECTION WITH TRANSACTIONS OF SECURITIES OF SUNNY LAND TOURS AND ANGLO AMERICAN PROPERTIES. THE IMPROPERLY SUPERVISED INDIVIDUAL ALLEGEDLY VIOLATED THE REGISTRATION PROVISIONS OF THE SEC ACT, PARTICIPATED IN A SCHEME TO MANIPULATE THE PRICES OF SECURITIES AND MADE MATERIALS MISSTATEMENTS OR OMISSIONS. THE FIRM AND PACE SIGNED THE ORDER WITHOUT ADMITTING OR DENYING THE SEC ALLEGATIONS. THE DEFENDANTS ALSO CONSENTED TO COMPLY WITH CERTAIN UNDERTAKINGS TO ESTABLISH COMPLIANCE PROCEDURES AT THE FIRM. (REL. 34-19453).



Regulatory - Final

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Disclosure

Reporting Source: REGULATOR (U6)

Current Status: FINAL

Allegations:

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

Date Initiated:

Docket/Case Number:

Principal Product Type:

Other Product Type(s):

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

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

Resolution: ACCEPTANCE, WAIVER AND CONSENT (AWC)

Resolution Date: 5/7/1974

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: COMPLAINT #AWC-133 FILED 05/07/74 CENSURED, FINED \$200.00 DECISION
05/07/74 FINAL FINES & COSTS FC PD 08/19/74 \$200.00



Regulatory - Final

This section provides information regarding any final, regulatory action as reported by the firm and/or a securities regulator to CRD as part of the securities industry registration and licensing process. Such event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a self-regulatory organization, a federal regulator such as the U.S. Securities and Exchange Commission (SEC) or the Commodity Futures Trading Commission (CFTC), or a foreign financial regulatory body) for a violation of investment-related rules or regulations. In addition, a revocation or suspension of the authority of a firm's control affiliate to act as an attorney, accountant or federal contractor, if any, will appear here.

Disclosure

Reporting Source: REGULATOR (U6)

Current Status: FINAL

Allegations:

Initiated By: NEW YORK STOCK EXCHANGE

Date Initiated:

Docket/Case Number:

Principal Product Type:

Other Product Type(s):

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

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

Resolution: ORDER

Resolution Date: 1/18/1988

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: 4/18/88-FORM U6 (8029-08888) DISCLOSES:ROONEY PACE INC., A FORMER MEMBER ORGANIZATION ENGAGED IN CONDUCT INCONSISTENT WITH JUST AND EQUITABLE PRINCIPLES OF TRADE IN THAT IT FAILED TO COMPUTE AND MAINTAIN ITS NET CAPITAL IN ACCORDANCE WITH THE REQUIREMENTS OF REGULATION 240.15c3-1 PROMULGATED UNDER THE SECURITIES EXCHANGE



ACT OF 1934 ("THE "ACT), MADE MISSTATEMENTS ON REPORTS FILED WITH THE EXCHANGE, VIOLATED SECTION 220.4(b) OF REGULATION T OF THE FEDERAL RESERVE BOARD ("FRB") PROMULGATED UNDER THE ACT IN THAT IT MAINTAINED JOINT MARGIN ACCOUNTS WITH REGISTERED REPRESENTATIVES WHO WERE NOT REQUIRED TO CONTRIBUTE ANY FUNDS, VIOLATED SECTION 220.4(c)3 OF REGULATION T IN THAT IT FAILED TO TAKE APPROPRIATE ACTION WHEN MARGIN CALLS WERE NOT MET WITHIN THE TIME PERIODS SPECIFIED THEREIN, VIOLATED SECTION 220.8(a) OF REGULATION T IN THAT IT FAILED TO TAKE APPROPRIATE ACTION WHEN CASH PAYMENT WAS NOT RECEIVED WITHIN THE TIME PERIOD SPECIFIED, VIOLATED REGULATION 240.17a-4 PROMULGATED UNDER THE ACT IN THAT IT FAILED TO RETAIN RECORDS EVIDENCING REQUIRED NET CAPITAL COMPUTATIONS, VIOLATED EXCHANGE RULE 345(a)(1) IN THAT IT PERMITTED A PERSON TO PERFORM THE DUTIES OF A REGISTERED REPRESENTATIVE WITHOUT BEING REGISTERED WITH THE EXCHANGE, VIOLATED EXCHANGE RULE 346(f) IN THAT, WITHOUT THE PERMISSION OF THE EXCHANGE, IT PERMITTED A PERSON SUBJECT TO A STATUTORY DISQUALIFICATION TO BE ASSOCIATED WITH IT, VIOLATED EXCHANGE RULE 405 IN THAT IT FAILED TO USE DUE DILIGENCE TO LEARN THE ESSENTIAL FACTS WITH RESPECT TO CUSTOMER ACCOUNTS, VIOLATED EXCHANGE RULE 407 IN THAT IT PERMITTED CUSTOMERS WHO WERE EMPLOYEES OF MEMBER FIRMS OR REGULATORY ORGANIZATIONS TO MAINTAIN ACCOUNTS WITHOUT OBTAINING THE WRITTEN CONSENT OF THESE ORGANIZATIONS, VIOLATED EXCHANGE RULE 408(b) IN THAT IT FAILED TO ASSURE THAT DISCRETIONARY ORDERS WERE IDENTIFIED AS SUCH ON THE ORDER TICKETS, VIOLATED EXCHANGE RULE 410(a) BY FAILING TO PREPARE TRANSMITTED OR CARRIED TO THE FLOOR, VIOLATED EXCHANGE RULE 410(a) BY PERMITTING ACCOUNT DESIGNATION CHANGES TO BE MADE WITHOUT SUPERVISORY APPROVAL, VIOLATED EXCHANGE RULE 431(d)7 IN THAT IT PERMITTED FREE RIDING IN CUSTOMER ACCOUNTS, VIOLATED EXCHANGE RULE 440 AND REGULATION 240.17a-3 PROMULGATED UNDER THE ACT IN THAT IT FAILED TO MAKE AND KEEP CURRENT CERTAIN BOOKS AND RECORDS, AND VIOLATED EXCHANGE RULE 342(a) and (b) BY FAILING TO EXERCISE SUPERVISION AND CONTROL OVER EACH OFFICE AND DEPARTMENT, BY FAILING TO ESTABLISH SYSTEMS OF FOLLOW-UP AND REVIEW AND BY FAILING TO ASSURE THAT DELEGATED AUTHORITY AND RESPONSIBILITY WERE BEING PROPERLY EXERCISED -- CONSENT TO CENSURE AND PERMANENT BAR. DOCKET/CASE NO. 88-4, DATED JANUARY

15 18, 1988.



Regulatory - Final

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Disclosure

Reporting Source: REGULATOR (U6)

Current Status: FINAL

Allegations:

Initiated By: SECURITIES AND EXCHANGE COMMISSION

Date Initiated:

Docket/Case Number:

Principal Product Type:

Other Product Type(s):

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

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

Resolution: ORDER

Resolution Date: 11/17/1987

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: 11/20/87-SEC NEWS DIGEST ISSUE 87-218 DATED NOVEMBER 17, 1987 ADMINISTRATIVE PROCEEDINGS DISCLOSES: 'ROONEY, PACE INC. AND RANDOLPH K. PACE SANCTIONED'; THE COMMISSION INSTITUTED CONSOLIDATED PROCEEDINGS UNDER SECTION 15(b) OF THE SECURITIES EXCHANGE ACT OF 1934 AGAINST ROONEY, PACE INC. AND RANDOLPH K.



PACE, CHAIRMAN OF THAT REGISTERED BROKER-DEALER FIRM, CONCERNING CONDUCT IN CONNECTION WITH THREE SEPARATE OFFERINGS. ROONEY, PACE AND PACE CONSENTED TO AN ORDER, WITHOUT ADMISSION OR DENIAL, WHICH FINDS THAT ROONEY, PACE WILLFULLY VIOLATED SECTIONS 5 AND 17(a) OF THE SECURITIES ACT OF 1933 AND SECTIONS 10(b), 13(d), 15(c)(1), and 17(a) OF THE EXCHANGE ACT AND RULES 10b-5, 10b-6, 13d-1, 15c1-2, 15c1-6, 17a-1, and 17a-3, AND THAT PACE WILLFULLY VIOLATED SECTIONS 5 AND 17(a) OF THE SECURITIES ACT AND 10(b) OF THE EXCHANGE ACT AND RULES 10b-5 and 10b-6, AND AIDED AND ABETTED VIOLATIONS OF THOSE ANTIFRAUD PROVISIONS AND OF SECTIONS 15(c)(1) and 17(a) OF THE EXCHANGE ACT AND RULES 15c1-2, 17a-1, AND 17a-3. THE COMMISSION CENSURED ROONEY, PACE AND ORDERED COMPLIANCE WITH ITS UNDERTAKING TO WITHDRAW ITS BROKER-DEALER REGISTRATION. PACE WAS SUSPENDED FROM ASSOCIATION WITH A BROKER FOR NINE MONTHS BEGINNING AFTER A THREE-MONTH SUSPENSION IN ANOTHER MATTER. RESTRICTIONS WERE PLACED ON HIS ACTIVITIES FOR FIVE YEARS THEREAFTER. (REL. 34-25125).



Regulatory - Final

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Disclosure

Reporting Source: REGULATOR (U6)

Current Status: FINAL

Allegations:

Initiated By: CALIFORNIA

Date Initiated:

Docket/Case Number:

Principal Product Type:

Other Product Type(s):

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

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

Resolution: REVOCATION

Resolution Date: 5/22/1987

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: 6/29/87 FORM U6 (17087 8034) DISCLOSES: BROKER DEALER CERTIFICATE SUMMARILY REVOKED PURSUANT TO SECTION 25242(b) OF THE CALIFORNIA CORPORATIONS CODE; UNABLE TO LOCATE.



Regulatory - Final

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Disclosure

Reporting Source: REGULATOR (U6)

Current Status: FINAL

Allegations:

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

Date Initiated:

Docket/Case Number:

Principal Product Type:

Other Product Type(s):

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

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

Resolution: ACCEPTANCE, WAIVER AND CONSENT (AWC)

Resolution Date: 12/9/1986

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: MARKET SURVEILLANCE COMMITTEE COMPLAINT #MS-447-AWC: LETTER OF ACCEPTANCE, WAIVER AND CONSENT (AWC) WAS FILED ON DECEMBER 9, 1986, ALLEGING VIOLATIONS OF PART I, SECTION C.3.(a) OF SCHEDULE D OF THE ASSOCIATION'S BY-LAWS IN THAT RESPONDENT (ROONEY PACE, INC.) ENTERED QUOTATIONS INTO THE NASDAQ SYSTEM ON 9/2/86 THAT WERE NOT



REASONABLY RELATED TO THE PREVAILING MARKET. THE AWC WAS ACCEPTED BY THE MARKET SURVEILLANCE COMMITTEE ON JANUARY 20, 1987 AND BY THE NATIONAL BUSINESS CONDUCT COMMITTEE ON FEBRUARY 17, 1987. \$500 FINE.



Regulatory - Final

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Disclosure

Reporting Source: REGULATOR (U6)

Current Status: FINAL

Allegations:

Initiated By: SECURITIES AND EXCHANGE COMMISSION

Date Initiated:

Docket/Case Number:

Principal Product Type:

Other Product Type(s):

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

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

Resolution: ORDER

Resolution Date: 6/19/1986

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: 7/23/86, SEC NEWS DIGEST, ISSUE 86-118, JUNE 19, 1986: THE COMMISSION ANNOUNCED TODAY THE FILING OF A COMPLAINT FOR INJUNCTIVE RELIEF AND OTHER EQUITABLE RELIEF IN THE USDC FOR THE SOUTHERN DISTRICT OF NEW YORK AGAINST CAPT. CRAB, INC., EDWARD R. SCHARPS, ROONEY, PACE INC., RANDOLPH K. PACE, JOSEPH LUGO, LEWIS LEEDS, INTER-FINANCIAL



CONSULTING CORP (IFCC) AND MARTIN ROTHMAN. THE COMPLAINT ALLEGES THAT IN 1982 AND 1983 CAPT. CRAB, INC., SCHARPS, ROONEY, PACE, PACE, LUGO, LEEDS, IFCC AND ROTHMAN VIOLATED CERTAIN OF THE STOCK REGISTRATION, ANTI-FRAUD AND ANTI-MANIPULATION PROVISIONS OF THE FEDERAL SECURITIES LAWS IN CONNECTION WITH THE OFFER, PURCHASE AND SALE OF THE SECURITIES OF CAPT. CRAB'S TAKE-AWAY, INC. AND CRAB HOUSE, INC., THE PREDECESSORS OF CAPT. CRAB, INC., ALL OF MIAMI, FLORIDA. SIMULTANEOUS WITH THE FILING OF THE COMPLAINT AND WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, CAPT. CRAB, INC. CONSENTED TO THE ENTRY OF A FINAL JUDGEMENT OF PERMANENT INJUNCTION RESTRAINING AND ENJOINING IT FROM FURTHER VIOLATIONS OF SECTION 5 AND 17(a) OF THE SECURITIES ACT OF 1933 AND SECTION 10(b) OF THE SECURITIES EXCHANGE ACT OF 1934 AND RULE 10b-5. (SEC V. CAPT. CRAB, INC., ET AL., SDNY CA NO. 86-4785 (PNL) (LR-11131).



Regulatory - Final

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Disclosure

Reporting Source: REGULATOR (U6)

Current Status: FINAL

Allegations:

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

Date Initiated:

Docket/Case Number:

Principal Product Type:

Other Product Type(s):

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

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

Resolution: CENSURE

Resolution Date: 10/31/1988

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: MARKET SURVEILLANCE COMMITTEE COMPLAINT #MS-313 FILED 06/16/1986, AGAINST ROONEY PACE, INC. (RPI), RANDOLPH PACE (PACE), DANIEL DISPIGNO (DISPIGNO), JOE FOOR (FOOR), COY DEAN (DEAN), TERRY ROGERS (ROGERS) AND THOMAS HENRY (HENRY). THE COMPLAINT CONTAINS SIX CAUSES OF



COMPLAINT WHICH, IN SUBSTANCE, ARE AS FOLLOWS:

FIRST CAUSE OF COMPLAINT ALLEGES VIOLATIONS OF ARTICLE III, SECTIONS 1 AND 18 OF THE RULES OF FAIR PRACTICE IN THAT RESPONDENTS JOE FOOR, COY DEAN, TERRY ROGERS AND THOMAS HENRY FROM ON OR ABOUT JULY 18, 1984 TO ON OR ABOUT JANUARY 31, 1985, EFFECTED TRANSACTIONS IN AEDC COMMON STOCK, ATTEMPTED TO INDUCE AND INDUCED CUSTOMERS TO PURCHASE SUCH STOCK BY MEANS OF DECEPTIVE AND FRAUDULENT DEVICES AND CONTRIVANCES. SECOND CAUSE OF COMPLAINT ALLEGES VIOLATIONS OF ARTICLE III, SECTIONS 1 AND 18 OF THE RULES OF FAIR PRACTICE IN THAT ON OR ABOUT JULY 18, 1984 TO ON OR ABOUT JANUARY 31, 1985, RESPONDENTS ROONEY PACE, RANDOLPH PACE, DESPINO, FOOR AND DEAN AIDED AND ABETTED BY RESPONDENTS AND HENRY, EFFECTED TRANSACTIONS IN AEDC COMMON STOCK AND ATTEMPTED TO INDUCE AND INDUCED CUSTOMERS TO PURCHASE AEDC COMMON STOCK BY MEANS OF

MANIPULATIVE DEVICES AND CONTRIVANCES.

THIRD CAUSE OF COMPLAINT ALLEGES VIOLATIONS OF ARTICLE III, SECTIONS 1 AND 19(a) OF THE RULES OF FAIR PRACTICE IN THAT ON OR ABOUT 21, 1984 TO ON OR ABOUT JANUARY 31, 1985, RESPONDENTS FOOR AND DEAN MADE IMPROPER USE OF CUSTOMERS' SECURITIES AND FUNDS BY ENGAGING IN UNAUTHORIZED PURCHASES OF AEDC COMMON STOCK. FOURTH CAUSE OF COMPLAINT ALLEGES VIOLATIONS OF ARTICLE III, SECTIONS AND 15(b) OF THE RULES OF FAIR PRACTICE IN THAT ON OR ABOUT DECEMBER 21, 1984 TO ON OR ABOUT JANUARY 31, 1985, RESPONDENTS FOOR AND DEAN EXECUTED TRANSACTIONS, ENGAGED IN ACTIVITIES AND EXERCISED DISCRETIONARY POWER IN CUSTOMERS' ACCOUNTS WITHOUT EACH CUSTOMERS GIVING PRIOR WRITTEN AUTHORIZATION TO EXERCISE SUCH DISCRETIONARY POWER. FIFTH CAUSE OF COMPLAINT ALLEGES VIOLATIONS OF SCHEDULE D OF THE BY-LAWS IN THAT ON OR ABOUT 18, 1984 TO ON OR ABOUT JANUARY 31, 1985, RESPONDENT ROONEY PACE, A NASDAQ MARKET MAKER ACTING THROUGH RESPONDENT DESPINO, INACCURATELY REPORTED PURCHASES AND SALES OF AEDC COMMON STOCK AND THIRTY-SIX OUT OF ONE HUNDRED AND THIRTY-EIGHT DAYS THAT RESPONDENT PACE REPORTED VOLUME IN AEDC COMMON STOCK.

SIXTH CAUSE OF COMPLAINT ALLEGES VIOLATIONS OF ARTICLE III, SECTIONS AND 27 OF THE RULES OF FAIR PRACTICE IN THAT DURING THE PERIOD FROM ON OR ABOUT JULY 18, 1984 TO ON OR ABOUT JANUARY 31, 1985, RESPONDENTS ROONEY PACE AND R. PACE FAILED TO ESTABLISH, MAINTAIN, IMPLEMENT AND ENFORCE ADEQUATE SUPERVISORY PROCEDURES NECESSARY TO PREVENT THE ABOVE ACTIVITIES. ON FEBRUARY 8, 1988 THE



COMMITTEE FOUND THE VIOLATIONS AS CHARGED IN EACH CAUSE OF COMPLAINT AS TO EACH RESPONDENT AND ASSESSED THE FOLLOWING SANCTIONS:

- 1) RESPONDENT ROONEY, PACE INC: CENSURED, FINED \$50,000 AND EXPELLED FROM MEMBERSHIP IN THIS ASSOCIATION.
- 2) RESPONDENT PACE: CENSURED, FINED \$100,000, SUSPENDED FROM ASSOCIATING WITH ANY MEMBER IN ANY CAPACITY FOR TWO YEARS; AND AT THE CONCLUSION OF THAT SUSPENSION HE IS SUSPENDED FOR A FURTHER FIVE YEARS FROM ASSOCIATING WITH ANY MEMBER IN ANY SUPERVISORY CAPACITY;
- 3) RESPONDENT DISPIGNO: CENSURED, FINED \$25,000 AND SUSPENDED FROM ASSOCIATION WITH ANY MEMBER FOR A PERIOD OF TWO YEARS;
- 4) RESPONDENT FOOR: CENSURED FINED \$50,000 AND BARRED FROM ASSOCIATION WITH ANY MEMBER;
- 5) RESPONDENT DEAN: CENSURED, FINED \$50,000 AND BARRED FROM ASSOCIATION WITH ANY MEMBER;
- 6) RESPONDENT ROGERS: CENSURED, FINED \$10,000 AND SUSPENDED FROM ASSOCIATION WITH ANY MEMBER FOR A PERIOD OF ONE YEAR;

EACH RESPONDENT, JOINTLY AND SEVERALLY, IS ASSESSED THE COST OF THE HEARING IN THE AMOUNT OF \$4,590. ALL OF THE ABOVE SUSPENSIONS ARE TO COMMENCE ON A DATE TO BE SET BY THE PRESIDENT OF THIS ASSOCIATION.

2/22/88 RESPONDENTS APPEALED THE SANCTIONS. BOARD OF GOVERNORS DECISION RENDERED OCTOBER 31, 1988 WHEREIN THE THE SANCTIONSIMPOSED BY THE MARKET SURVEILLANCE COMMITTEE ARE AFFIRMED IN THEIR ENTIRETY.



Regulatory - Final

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Disclosure

Reporting Source: REGULATOR (U6)

Current Status: FINAL

Allegations:

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

Date Initiated:

Docket/Case Number:

Principal Product Type:

Other Product Type(s):

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

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

Resolution: FINE

Resolution Date: 5/31/1985

Sanctions Ordered:

Other Sanctions Ordered:

Sanction Details: FEBRUARY 4, 1986: MARKET SURVEILLANCE COMMITTEE COMPLAINT #MS-143-SC FILED 5/2/85, ALLEGING VIOLATIONS OF "EXCESS SPREAD". DECISION RENDERED 5/31/85 WHEREIN THE RESPONDENT WAS FINED \$250.



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The forms used by brokerage firms, Forms BD and BDW, are established by the Securities and Exchange Commission (SEC) and adopted by all state securities regulators and self-regulatory organizations (SROs). FINRA and the North American Securities Administrators Association (NASAA) establish the Forms U4 and U5, the forms that collect broker information. Regulators provide information via Form U6, which is used primarily to report certain history about brokerage firms and brokers. These forms are approved by the SEC.

How current is the information contained in BrokerCheck?

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