

BrokerCheck Report

THE BAKER GROUP, LP

CRD# 7888

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

Please contact FINRA with any concerns.

About BrokerCheck®



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

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

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

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

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

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

- **How current is this information?**

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

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

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

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

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

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Thank you for using FINRA BrokerCheck.



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



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.



THE BAKER GROUP, LP

CRD# 7888

SEC# 8-23684

Main Office Location

1601 NW EXPRESSWAY
21ST FLOOR
OKLAHOMA CITY, OK 73118-1426
Regulated by FINRA New Orleans Office

Mailing Address

1601 NW EXPRESSWAY
SUITE 2000
OKLAHOMA CITY, OK 73118-1426

Business Telephone Number

405-415-7202

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 partnership.
This firm was formed in Oklahoma on 05/20/1992.
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
- 27 U.S. states and territories

Is this brokerage firm currently suspended with any regulator?

No

This firm conducts 7 types of businesses.

This firm is not affiliated with any 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	4



Firm Profile

This firm is classified as a partnership.
This firm was formed in Oklahoma on 05/20/1992.
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.

THE BAKER GROUP, LP
Doing business as THE BAKER GROUP, LP
CRD# 7888
SEC# 8-23684

Main Office Location
1601 NW EXPRESSWAY
21ST FLOOR
OKLAHOMA CITY, OK 73118-1426

Regulated by FINRA New Orleans Office

Mailing Address
1601 NW EXPRESSWAY
SUITE 2000
OKLAHOMA CITY, OK 73118-1426

Business Telephone Number
405-415-7202

Other Names of this Firm

Name	Where is it used
JAMES BAKER & ASSOCIATES, A LIMITED PARTNERSHIP	AZ, CO, FL, GA, ID, MT, ND, NE, NM, OH, OK, OR, SD, UT, WA, WY
JAMES BAKER & ASSOCIATES, LP	AZ, CO, FL, GA, ID, MT, ND, NE, NM, OH, OK, OR, UT, WA, WY
THE BAKER GROUP	AZ, CO, FL, GA, ID,

	MT, ND, NE, NM, OH, OK, OR, SD, UT, WA, WY
THE BAKER GROUP PORTFOLIO MANAGEMENT, LP	CA, IA, IL, IN, KS, LA, NV, OK, TX



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):	JAMES BAKER GROUP, INC.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	GENERAL PARTNER
Position Start Date	05/1992
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):	HAYHURST, RYAN WARNER 2783567
Is this a domestic or foreign entity or an individual?	Individual
Position	PRESIDENT
Position Start Date	01/2022
Percentage of Ownership	10% but less than 25%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	HILL, RONALD AUSTIN 4652327
Is this a domestic or foreign entity or an individual?	Individual
Position	MANAGING PARTNER
Position Start Date	01/2017



Firm Profile

Direct Owners and Executive Officers (continued)

Percentage of Ownership 10% but less than 25%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): HUXLEY, CARL WAYNE
5476871

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

Position CHIEF EXECUTIVE OFFICER

Position Start Date 01/2017

Percentage of Ownership 5% but less than 10%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): THE BAKER GROUP SOFTWARE SOLUTIONS, INC.

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

Position CLASS A LIMITED PARTNER

Position Start Date 05/1992

Percentage of Ownership 5% but less than 10%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): AFFOLDER, BRIAN LEE
2170742

Firm Profile



Direct Owners and Executive Officers (continued)

Is this a domestic or foreign entity or an individual?	Individual
Position	MANAGING PARTNER
Position Start Date	01/2023
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
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Legal Name & CRD# (if any):	BAUMANN, MARK DUANE 5977593
Is this a domestic or foreign entity or an individual?	Individual
Position	MANAGING PARTNER
Position Start Date	01/2022
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):	BLOSS, JOHN DAVID 5423261
Is this a domestic or foreign entity or an individual?	Individual
Position	MANAGING PARTNER
Position Start Date	01/2023
Percentage of Ownership	Less than 5%



Firm Profile

Direct Owners and Executive Officers (continued)

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

Is this a public reporting company? No

Legal Name & CRD# (if any): CURRIE, JOHN TAYLOR
2800397

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

Position MANAGING PARTNER

Position Start Date 01/2024

Percentage of Ownership Less than 5%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): HART, FRANK GERALD
5666950

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

Position MANAGING PARTNER

Position Start Date 01/2022

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): KINZER, JANTZ HUGHES
2398922



Firm Profile

Direct Owners and Executive Officers (continued)

Is this a domestic or foreign entity or an individual?	Individual
Position	MANAGING PARTNER
Position Start Date	03/2023
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):	OAKES, JEFFREY ROBERT 4020640
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Is this a domestic or foreign entity or an individual?	Individual
Position	MANAGING PARTNER
Position Start Date	01/2024
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	PHILLIPS, KATHRYN ANNE 4707853
Is this a domestic or foreign entity or an individual?	Individual
Position	MANAGING PARTNER/CHIEF FINANCIAL OFFICER/CHIEF OPERATIONS OFFICER
Position Start Date	01/2023
Percentage of Ownership	Less than 5%

Firm Profile



Direct Owners and Executive Officers (continued)

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

Is this a public reporting company? No

Legal Name & CRD# (if any): STENSETH, PHILIP CLARK
1845025

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

Position MANAGING PARTNER

Position Start Date 01/2002

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): WRINKLE, MISTY WELLS
2752550

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

Position CHIEF COMPLIANCE OFFICER

Position Start Date 01/2013

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

Firm Profile

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

Indirect Owners

No information reported.



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 27 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	04/25/1979

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

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

A government securities broker or dealer only: No

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

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	04/27/1979

Firm Operations



Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alaska	Approved	04/08/2016
Arizona	Approved	09/10/1998
Arkansas	Approved	01/03/2019
California	Approved	01/08/2019
Colorado	Approved	02/22/1983
Connecticut	Approved	01/04/2019
Delaware	Approved	04/28/2025
Georgia	Approved	06/18/1998
Illinois	Approved	01/15/1991
Indiana	Approved	03/14/1994
Iowa	Approved	12/17/2018
Kansas	Approved	04/04/1983
Kentucky	Approved	07/10/2020
Louisiana	Approved	12/26/2018
New Jersey	Approved	07/23/2021
New York	Approved	05/30/2018
North Dakota	Approved	12/10/1993
Ohio	Approved	08/07/2019
Oklahoma	Approved	07/17/1982
Pennsylvania	Approved	02/22/2019
South Carolina	Approved	09/03/2019
South Dakota	Approved	12/17/2018
Texas	Approved	06/15/1992
Utah	Approved	01/09/1995
Vermont	Approved	11/05/2020
Washington	Approved	07/02/2025
Wisconsin	Approved	01/02/2019



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 7 types of businesses.

Types of Business

U S. government securities dealer
U S. government securities broker
Municipal securities dealer
Municipal securities broker
Investment advisory services
Trading securities for own account
Other - THE BAKER GROUP LP ENGAGES IN MUNICIPAL ADVISORY ACTIVITIES.

Other Types of Business

This firm does not effect transactions in commodities, commodity futures, or commodity options.
This firm does engage in other non-securities business.

Non-Securities Business Description: 13B THE BAKER GROUP MARKETS ASSET/LIABILITY MANAGEMENT MICROCOMPUTER SOFTWARE FOR USE BY ITS COMMERCIAL AND FINANCIAL INSTITUTION CLIENTS.

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, 10TH FLOOR JERSEY CITY, NJ 07999
Effective Date:	01/17/2003
Description:	AS INTRODUCING BROKER, WE HAVE A FULLY-DISCLOSED CLEARING AGREEMENT WITH PERSHING, LLC, LOCATED AT ONE PERSHING PLAZA, 10TH FLOOR, JERSEY CITY, NEW JERSEY 07999 - ORIGINAL AGREEMENT DATED 5/4/1984

Firm Operations

Industry Arrangements



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

Name: SMARSH. INC

Business Address: 921 SW WASHINGTON STREET STE.540
STE 540
PORTLAND, OR 97205

Effective Date: 10/28/2010

Description: ARCHIVING OF ALL INTERNAL AND EXTERNAL ELECTRONIC CORRESPONDENCE, PRESERVING RECORDS IN A NON-RE-WRITABLE, NON-ERASABLE FORMAT, VERIFYING AUTOMATICALLY THE QUALITY AND ACCURACY OF THE STORAGE PROCESS, SERIALIZING THE ORIGINAL AND DUPLICATE UNITES OF STORAGE MEDIA, AND TIME-DATE THE INFORMATION PLACED ON THE ESM AND GIVES CAPACITY TO DOWNLOAD INDEXES AND REORDS TO AN REGULATORY ACCEPTABLE MEDIUM

Name: DUNN & STONE CPA

Business Address: 4900 RICHMOND SQUARE
SUITE 202
OKLAHOMA CITY, OK 73118

Effective Date: 01/01/2003

Description: REVIEWED E-MAILS WILL BE STORED ON RO CDS. A COPY WILL BE STORED IN OUR OFFICE AND ONE WILL BE STORED IN THE OFFICES OF DUNN & STONE CPAS. THE E-MAILS ARE RETRIEVABLE THROUGH MICROSOFT OUTLOOK

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 not, directly or indirectly:

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

This firm is not directly or indirectly, controlled by the following:

- bank holding company
- national bank
- state member bank of the Federal Reserve System
- state non-member bank
- savings bank or association
- credit union
- or foreign bank



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	4	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 4

Reporting Source: Regulator

Current Status: Final



Allegations:	THE BAKER GROUP EMPLOYED AND ASSOCIATED WITH UNREGISTERED AGENTS.
Initiated By:	OKLAHOMA DEPARTMENT OF SECURITIES
Date Initiated:	06/27/2019
Docket/Case Number:	19-084
URL for Regulatory Action:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	06/27/2019
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:	Monetary/Fine \$15,000.00
Other Sanctions Ordered:	AS PART OF THE AGREEMENT TO RESOLVE THIS MATTER, MISTY WRINKLE, THE CCO OF THE BAKER GROUP, WILL COMPLETE 20 HOURS OF COMPLIANCE TRAINING.
Sanction Details:	THE CIVIL PENALTY WAS PAID AS ORDERED.
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Reporting Source:	Firm
Current Status:	Final
Allegations:	BETWEEN OCTOBER 5, 2016 AND APRIL 2019, THE BAKER GROUP EMPLOYED AND ASSOCIATED WITH SIX AGENTS WHO TRANSACTED BUSINESS IN THIS STATE ON ITS BEHALF BUT WERE UNREGISTERED, AND NOT EXEMPT FROM REGISTRATION, UNDER THE OKLAHOMA UNIFORM SECURITIES ACT OF 2004,IN VIOLATION OF SECTION 1-402(D) OF THE ACT DUE TO FILING ERRORS MADE BY THE CHIEF COMPLIANCE OFFICER.
Initiated By:	OKLAHOMA DEPARTMENT OF SECURITIES



Date Initiated:	06/27/2019
Docket/Case Number:	ODS 19-084
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	06/03/2021
Sanctions Ordered:	Monetary/Fine \$15,000.00
Other Sanctions Ordered:	
Sanction Details:	THE FIRM PAID A CIVIL PENALTY IN THE AMOUNT OF \$15,000 TO THE OKLAHOMA INVESTOR EDUCATION REVOLVING FUND ON 6/20/2019.
Firm Statement	RESOLVED THROUGH AN ORDER WHICH WAS ISSUED BY THE OKLAHOMA DEPARTMENT OF SECURITIES ON 6/27/2019.

Disclosure 2 of 4

Reporting Source:	Regulator
Current Status:	Final
Allegations:	SEC ADMIN RELEASES 33-9811; 34-75205, JUNE 18, 2015: THE SECURITIES AND EXCHANGE COMMISSION DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS BE, AND HEREBY ARE, INSTITUTED AGAINST THE BAKER GROUP, LP ("RESPONDENT"). RESPONDENT WILLFULLY VIOLATED SECTION 17(A)(2) OF THE SECURITIES ACT. THIS MATTER INVOLVES VIOLATIONS OF AN ANTIFRAUD PROVISION OF THE FEDERAL SECURITIES LAWS IN CONNECTION WITH RESPONDENT'S UNDERWRITING OF CERTAIN MUNICIPAL SECURITIES OFFERINGS. RESPONDENT, A REGISTERED BROKER-DEALER, CONDUCTED INADEQUATE DUE DILIGENCE IN CERTAIN OFFERINGS AND AS A RESULT, FAILED TO FORM A REASONABLE BASIS FOR BELIEVING THE TRUTHFULNESS OF CERTAIN MATERIAL REPRESENTATIONS IN OFFICIAL STATEMENTS ISSUED IN CONNECTION WITH THOSE OFFERINGS. THIS RESULTED IN RESPONDENT OFFERING AND SELLING MUNICIPAL SECURITIES ON THE BASIS OF MATERIALLY MISLEADING DISCLOSURE DOCUMENTS.



THE VIOLATIONS WERE SELF-REPORTED BY RESPONDENT TO THE COMMISSION PURSUANT TO THE DIVISION OF ENFORCEMENT'S (THE "DIVISION") MUNICIPALITIES CONTINUING DISCLOSURE COOPERATION (MCDC) INITIATIVE.

Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	06/18/2015
Docket/Case Number:	3-16605
Principal Product Type:	Debt - Municipal
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	06/18/2015
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	Yes
Sanctions Ordered:	Monetary/Fine \$250,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	THE RESPONDENT SHALL CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 17(A)(2) OF THE SECURITIES ACT, PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$250,000 AND COMPLY WITH THE UNDERTAKINGS ENUMERATED IN THE OFFER OF SETTLEMENT.
Regulator Statement	IN ANTICIPATION OF THE INSTITUTION OF THESE PROCEEDINGS, RESPONDENT HAS SUBMITTED AN OFFER OF SETTLEMENT (THE "OFFER") WHICH THE COMMISSION HAS DETERMINED TO ACCEPT. SOLELY FOR THE PURPOSE OF THESE PROCEEDINGS AND ANY OTHER PROCEEDINGS BROUGHT BY OR ON BEHALF OF THE COMMISSION, OR TO WHICH THE COMMISSION IS A PARTY, AND WITHOUT ADMITTING OR DENYING THE FINDINGS, EXCEPT AS TO THE COMMISSION'S JURISDICTION OVER IT AND THE SUBJECT MATTER OF THESE PROCEEDINGS, WHICH ARE ADMITTED, RESPONDENT CONSENTS TO THE ENTRY OF THIS ORDER INSTITUTING



ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS PURSUANT TO SECTION 8A OF THE SECURITIES ACT OF 1933 AND SECTION 15(B) OF THE SECURITIES EXCHANGE ACT OF 1934, MAKING FINDINGS, AND IMPOSING REMEDIAL SANCTIONS AND A CEASE-AND-DESIST ORDER. IN VIEW OF THE FOREGOING, THE COMMISSION DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST TO IMPOSE THE SANCTIONS AGREED TO IN RESPONDENT'S OFFER. ACCORDINGLY, IT IS HEREBY ORDERED THAT RESPONDENT SHALL, CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF 17(A)(2) OF THE SECURITIES ACT; WITHIN TEN (10) DAYS OF THE ENTRY OF THIS ORDER, PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$250,000 TO THE SECURITIES AND EXCHANGE COMMISSION; AND RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A REVIEW OF RESPONDENT'S POLICIES AND PROCEDURES AS THEY RELATE TO MUNICIPAL SECURITIES UNDERWRITING DUE DILIGENCE.

Reporting Source: Firm

Current Status: Final

Allegations: SEC ADMIN RELEASES 33-9811; 34-75205, JUNE 18, 2015: THE SECURITIES AND EXCHANGE COMMISSION DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS BE, AND HEREBY ARE, INSTITUTED AGAINST THE BAKER GROUP, LP ("RESPONDENT"). RESPONDENT WILLFULLY VIOLATED SECTION 17(A)(2) OF THE SECURITIES ACT. THIS MATTER INVOLVES VIOLATIONS OF AN ANTIFRAUD PROVISION OF THE FEDERAL SECURITIES LAWS IN CONNECTION WITH RESPONDENT'S UNDERWRITING OF CERTAIN MUNICIPAL SECURITIES OFFERINGS. RESPONDENT, A REGISTERED BROKER-DEALER, CONDUCTED INADEQUATE DUE DILIGENCE IN CERTAIN OFFERINGS AND AS A RESULT, FAILED TO FORM A REASONABLE BASIS FOR BELIEVING THE TRUTHFULNESS OF CERTAIN MATERIAL REPRESENTATIONS IN OFFICIAL STATEMENTS ISSUED IN CONNECTION WITH THOSE OFFERINGS. THIS RESULTED IN RESPONDENT OFFERING AND SELLING MUNICIPAL SECURITIES ON THE BASIS OF MATERIALLY MISLEADING DISCLOSURE DOCUMENTS. THE VIOLATIONS WERE SELF-REPORTED BY RESPONDENT TO THE COMMISSION PURSUANT TO THE DIVISION OF ENFORCEMENT'S (THE "DIVISION") MUNICIPALITIES CONTINUING DISCLOSURE COOPERATION (MCDC) INITIATIVE.

Initiated By: UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Date Initiated: 06/18/2015

Docket/Case Number: 3-16605



Principal Product Type:	Debt - Municipal
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	06/18/2015
Sanctions Ordered:	Monetary/Fine \$250,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	THE RESPONDENT SHALL CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 17(A)(2) OF THE SECURITIES ACT, PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$250,000 AND COMPLY WITH THE UNDERTAKINGS ENUMERATED IN THE OFFER OF SETTLEMENT.
Firm Statement	IN ANTICIPATION OF THE INSTITUTION OF THESE PROCEEDINGS, RESPONDENT HAS SUBMITTED AN OFFER OF SETTLEMENT (THE "OFFER") WHICH THE COMMISSION HAS DETERMINED TO ACCEPT. SOLELY FOR THE PURPOSE OF THESE PROCEEDINGS AND ANY OTHER PROCEEDINGS BROUGHT BY OR ON BEHALF OF THE COMMISSION, OR TO WHICH THE COMMISSION IS A PARTY, AND WITHOUT ADMITTING OR DENYING THE FINDINGS, EXCEPT AS TO THE COMMISSION'S JURISDICTION OVER IT AND THE SUBJECT MATTER OF THESE PROCEEDINGS, WHICH ARE ADMITTED, RESPONDENT CONSENTS TO THE ENTRY OF THIS ORDER INSTITUTING ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS PURSUANT TO SECTION 8A OF THE SECURITIES ACT OF 1933 AND SECTION 15(B) OF THE SECURITIES EXCHANGE ACT OF 1934, MAKING FINDINGS, AND IMPOSING REMEDIAL SANCTIONS AND A CEASE-AND-DESIST ORDER. IN VIEW OF THE FOREGOING, THE COMMISSION DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST TO IMPOSE THE SANCTIONS AGREED TO IN RESPONDENT'S OFFER. ACCORDINGLY, IT IS HEREBY ORDERED THAT RESPONDENT SHALL, CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF 17(A)(2) OF THE SECURITIES ACT; WITHIN TEN (10) DAYS OF THE ENTRY OF THIS ORDER, PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$250,000 TO THE SECURITIES AND EXCHANGE COMMISSION; AND RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A REVIEW OF RESPONDENT'S POLICIES AND PROCEDURES AS THEY RELATE TO MUNICIPAL SECURITIES UNDERWRITING DUE DILIGENCE.



Disclosure 3 of 4

Reporting Source:	Regulator
Current Status:	Final
Allegations:	FINRA RULES 2010, 6730(A), 6730(C)(8) - THE BAKER GROUP, LP FAILED TO REPORT S1 TRANSACTIONS IN TRADE REPORTING AND COMPLIANCE ENGINE (TRACE)-ELIGIBLE AGENCY DEBT SECURITIES TO TRACE WITHIN 15 MINUTES OF THE EXECUTION TIME. THIS CONDUCT CONSTITUTES SEPARATE AND DISTINCT VIOLATIONS OF FINRA RULE 6730(A) AND A PATTERN OR PRACTICE OF LATE REPORTING WITHOUT EXCEPTIONAL CIRCUMSTANCES IN VIOLATION OF FINRA RULE 2010. THE FIRM FAILED TO REPORT THE CORRECT TRADE EXECUTION TIME FOR TRANSACTIONS IN TRACE-ELIGIBLE SECURITIZED PRODUCTS. THESE INACCURATE REPORTS CONSTITUTED 33% OF THE MATCHED INTER-DEALER REPORTS SUBMITTED BY THE FIRM TO TRACE DURING THE PERIOD.
Initiated By:	FINRA
Date Initiated:	01/15/2013
Docket/Case Number:	2011027521501
Principal Product Type:	Other
Other Product Type(s):	TRACE-ELIGIBLE AGENCY DEBT SECURITIES, TRACE-ELIGIBLE SECURITIZED PRODUCTS
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	01/15/2013
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 \$16,000.00
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 \$16,000. FINE PAID IN FULL ON 1/29/2013.
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Reporting Source:	Firm
Current Status:	Final
Allegations:	FINRA RULES 2010, 6730(A), 6730(C)(8) - THE BAKER GROUP, LP FAILED TO REPORT S1 TRANSACTIONS IN TRADE REPORTING AND COMPLIANCE ENGINE (TRACE)-ELIGIBLE AGENCY DEBT SECURITIES TO TRACE WITHIN 15 MINUTES OF THE EXECUTION TIME. THIS CONDUCT CONSTITUTES SEPARATE AND DISTINCT VIOLATIONS OF FINRA RULE 6730(A) AND A PATTERN OR PRACTICE OF LATE REPORTING WITHOUT EXCEPTIONAL CIRCUMSTANCES IN VIOLATION OF FINRA RULE 2010. THE FIRM FAILED TO REPORT THE CORRECT TRADE EXECUTION TIME FOR TRANSACTIONS IN TRACE-ELIGIBLE SECURITIZED PRODUCTS. THESE INACCURATE REPORTS CONSTITUTED 33% OF THE MATCHED INTER-DEALER REPORTS SUBMITTED BY THE FIRM TO TRACE DURING THE PERIOD.
Initiated By:	FINANCIAL INDUSTRY REGULATORY AUTHORITY ("FINRA")
Date Initiated:	01/15/2013
Docket/Case Number:	2011027521501
Principal Product Type:	Other
Other Product Type(s):	TRACE-ELIGIBLE AGENCY DEBT SECURITIES, TRACE-ELIGIBLE SECURITIZED PRODUCTS
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	\$16,000 FINE
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	01/15/2013
Sanctions Ordered:	Censure Monetary/Fine \$16,000.00
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 \$16,000.00

**Disclosure 4 of 4****Reporting Source:** Regulator**Current Status:** Final

Allegations: SEC RULE 17A-4, FINRA RULE 2010, NASD RULES 2110, 3010(D)(2), 3110, MSRB RULES G-9(B), G-14, G-27, G-27(E)(II), G-32 - THE BAKER GROUP, LP FAILED TO TIMELY DELIVER OFFICIAL STATEMENTS TO CUSTOMERS PURCHASING A NEW ISSUE MUNICIPAL SECURITY DURING THE PRIMARY OFFERING DISCLOSURE PERIOD; THE OFFICIAL STATEMENTS WERE DELIVERED BETWEEN ONE AND 14 DAYS FOLLOWING SETTLEMENT DATE. THE FIRM FAILED TO COMPLY WITH THE REPORTING REQUIREMENTS OF MSRB RULE G-14 BY FAILING TO ACCURATELY REPORT TRANSACTIONS INVOLVING NEW ISSUE MUNICIPAL SECURITIES - THE FIRM REPORTED THE TRANSACTIONS WITHOUT THE APPLICABLE SPECIAL CONDITION INDICATOR, M020; AND THE FIRM INCORRECTLY CODED STEP-OUT TRADES WITH ITS CLEARING FIRM AND STEP-OUT TRADES WITH ANOTHER CONTRA-PARTY - IN ALL BUT A FEW CASES, THE FIRM FAILED TO REPORT THE ASSOCIATED CONTEMPORANEOUS PRINCIPAL TRANSACTION WITH THE CUSTOMER. THE FIRM FAILED TO ADOPT, MAINTAIN AND ENFORCE ADEQUATE SUPERVISORY PROCEDURES TO ENSURE COMPLIANCE WITH MSRB RULE G-32'S OFFICIAL STATEMENT DELIVERY OBLIGATIONS RELATING TO SECONDARY MARKET TRANSACTIONS INVOLVING NEW ISSUE MUNICIPAL SECURITIES. THE FIRM FAILED TO IMPLEMENT SUPERVISORY PROCEDURES ADDRESSING SPECIFICALLY HOW IT WOULD CONDUCT REVIEWS TO ENSURE THAT ALL OF ITS MUNICIPAL SECURITIES TRANSACTIONS WERE BEING REPORTED TIMELY AND ACCURATELY TO THE MSRB. THE FIRM ASSIGNED EACH OF ITS ASSOCIATED PERSONS A FIRM-SPONSORED EMAIL ADDRESS AND ALL EMAILS SENT OR RECEIVED VIA THAT PLATFORM WERE REVIEWED BY THE FIRM'S CHIEF COMPLIANCE OFFICER AND FOLLOWING THAT REVIEW, ANY EMAILS THAT DID NOT INVOLVE A COMMUNICATION WITH THE PUBLIC RELATING TO THE FIRM'S INVESTMENT BANKING OR SECURITIES BUSINESS WERE SYSTEMATICALLY DELETED. THE FIRM UTILIZED AN INTERNAL INSTANT MESSAGING SYSTEM FOR INTER-OFFICE COMMUNICATIONS BUT FAILED TO PRESERVE AND MAINTAIN COPIES OF ANY MESSAGES SENT OR RECEIVED VIA THAT PLATFORM. THE FIRM PERMITTED ITS ASSOCIATED PERSONS TO UTILIZE BLOOMBERG EMAIL ACCOUNTS FOR BUSINESS-RELATED COMMUNICATIONS, INCLUDING THOSE WITH OUTSIDE PERSONS AND ENTITIES, BUT FAILED TO IMPLEMENT PROCEDURES FOR THE SUPERVISORY REVIEW OF THOSE COMMUNICATIONS.

Initiated By: FINRA



Date Initiated: 03/13/2012

Docket/Case Number: [2010020967201](#)

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: 03/13/2012

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 \$80,000.00

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 \$80,000. THE FULL AMOUNT OF THE FINE IS ATTRIBUTABLE TO MSRB RULE VIOLATIONS. FINE PAID IN FULL ON MARCH 21, 2012.

Reporting Source: Firm

Current Status: Final

Allegations: FAILURE TO TIMELY DELIVER OFFICIAL STATEMENTS, MUNICIPAL SECURITIES TRANSACTION REPORTING VIOLATIONS, FAILURE TO ADOPT, MAINTAIN, AND ENFORCE ADEQUATE WRITTEN SUPERVISORY PROCEDURES AS REQUIRED BY MSRB RULE G-27. FAILURE TO PRESERVE AND MAINTAIN EMAILS AND INSTANT MESSAGES AND FAILURE TO ADOPT, MAINTAIN, AND ENFORCE ADEQUATE SUPERVISORY PROCEDURES RELATING TO SUPERVISORY REVIEW OF ELECTRONIC COMMUNICATIONS

Initiated By: FINANCIAL INDUSTRY REGULATORY AUTHORITY ("FINRA")

Date Initiated: 11/03/2010



Docket/Case Number:	<u>2010020967201</u>
Principal Product Type:	Debt - Municipal
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	\$80,000 FINE
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	03/13/2012
Sanctions Ordered:	Censure Monetary/Fine \$80,000.00
Other Sanctions Ordered:	
Sanction Details:	\$80,000 AGAINST APPLICANT PAID ON 3/20/2012
Firm Statement	CHECK FOR FINE ISSUED AND SENT OVERNIGHT ON 3/20/2012

End of Report



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