

## BrokerCheck Report

# LUIS FERNANDO RESTREPO

CRD# 2167380

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Please be aware that fraudsters may link to BrokerCheck from phishing and similar scam websites, trying to steal your personal information or your money. Make sure you know who you're dealing with when investing, and contact FINRA with any concerns.

For more information read our [investor alert](#) on imposters.

## About BrokerCheck®

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

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

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.
- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

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

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

- **How current is this information?**

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

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

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

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

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

Thank you for using FINRA BrokerCheck.



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

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



For additional information about the contents of this report, please refer to the User Guidance or [www.finra.org/brokercheck](http://www.finra.org/brokercheck). It provides a glossary of terms and a list of frequently asked questions, as well as additional resources.

[For more information about FINRA, visit www.finra.org.](http://www.finra.org)

**LUIS F. RESTREPO**

CRD# 2167380

This broker is not currently registered.

## Report Summary for this Broker



This report summary provides an overview of the broker's professional background and conduct. Additional information can be found in the detailed report.

### Broker Qualifications

This broker is not currently registered.

#### This broker has passed:

- 3 Principal/Supervisory Exams
- 6 General Industry/Product Exams
- 1 State Securities Law Exam

### Registration History

This broker was previously registered with the following securities firm(s):

- B** **CAMDEN FINANCIAL SERVICES**  
CRD# 19925  
KELLER, TX  
03/2020 - 12/2020
- B** **FUSION ANALYTICS SECURITIES LLC**  
CRD# 124245  
CORAL SPRINGS, FL  
04/2016 - 10/2018
- B** **ALEXANDER CAPITAL, L.P.**  
CRD# 40077  
NEW YORK, NY  
10/2015 - 04/2016

### Disclosure Events

All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

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

The following types of disclosures have been reported:

Type	Count
Regulatory Event	1

## Broker Qualifications



### Registrations

This section provides the self-regulatory organizations (SROs) and U.S. states/territories the broker is currently registered and licensed with, the category of each license, and the date on which it became effective. This section also provides, for every brokerage firm with which the broker is currently employed, the address of each branch where the broker works.

This broker is not currently registered.



## Broker Qualifications

### Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below.

**This individual has passed 3 principal/supervisory exams, 6 general industry/product exams, and 1 state securities law exam.**

### Principal/Supervisory Exams

Exam	Category	Date
<b>B</b> Municipal Securities Principal Examination	Series 53	09/11/2006
<b>B</b> Registered Options Principal Examination	Series 4	08/26/2006
<b>B</b> General Securities Principal Examination	Series 24	01/30/1999

### General Industry/Product Exams

Exam	Category	Date
<b>B</b> Securities Industry Essentials Examination	SIE	10/01/2018
<b>B</b> Research Analyst Exam - Part I Analysis Module	Series 86	11/06/2011
<b>B</b> Research Analyst Exam - Part II Regulations Module	Series 87	08/10/2011
<b>B</b> Investment Banking Registered Representative Examination	Series 79	09/28/2010
<b>B</b> Limited Representative-Equity Trader Exam	Series 55	03/26/1999
<b>B</b> General Securities Representative Examination	Series 7	08/15/1991

### State Securities Law Exams

Exam	Category	Date
<b>B</b> Uniform Securities Agent State Law Examination	Series 63	10/29/1991

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at [www.finra.org/brokerqualifications/registeredrep/](http://www.finra.org/brokerqualifications/registeredrep/).

## Broker Qualifications



## Professional Designations

This section details that the representative has reported **0** professional designation(s).

No information reported.



## Registration and Employment History

### Registration History

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
<b>B</b> 03/2020 - 12/2020	CAMDEN FINANCIAL SERVICES	19925	KELLER, TX
<b>B</b> 04/2016 - 10/2018	FUSION ANALYTICS SECURITIES LLC	124245	CORAL SPRINGS, FL
<b>B</b> 10/2015 - 04/2016	ALEXANDER CAPITAL, L.P.	40077	NEW YORK, NY
<b>B</b> 03/2015 - 03/2015	DAKOY CAPITAL MARKETS LLC	169954	HUNTINGTON, NY
<b>B</b> 02/2014 - 07/2014	FUSION ANALYTICS SECURITIES LLC	124245	CORAL SPRINGS, FL
<b>B</b> 12/2010 - 01/2013	RELIGARE CAPITAL MARKETS INC.	153292	NEW YORK, NY
<b>B</b> 03/2000 - 03/2010	MULTITRADE SECURITIES LLC	47485	NEW YORK, NY
<b>B</b> 08/1991 - 05/1999	INSTINET CORPORATION	14408	NEW YORK, NY

### Employment History

This section provides up to 10 years of an individual broker's employment history as reported by the individual broker on the most recently filed Form U4.

**Please note that the broker is required to provide this information only while registered with FINRA or a national securities exchange and the information is not updated via Form U4 after the broker ceases to be registered. Therefore, an employment end date of "Present" may not reflect the broker's current employment status.**

Employment	Employer Name	Position	Investment Related	Employer Location
03/2020 - Present	Camden Financial Services	Registered Representative	Y	Los Angeles, CA, United States
11/2018 - 03/2020	Self-Employed	Consultant	N	PEMBROKE PINES, FL, United States
04/2016 - 10/2018	Fusion analytics securities LLC	Chief Compliance Officer	Y	New York, NY, United States
10/2015 - 04/2016	Alexander Capital LP	CCO	Y	New York, NY, United States
01/2013 - 10/2015	Self-Employed	Consultant	Y	NEW YORK, NY, United States
10/2014 - 03/2015	DAKOY CAPITAL MARKETS LLC	CEO	Y	NEW YORK, NY, United States



## Registration and Employment History

### Employment History, continued

Employment	Employer Name	Position	Investment Related	Employer Location
02/2014 - 07/2014	FUSION ANALYTICS SECURITIES LLC	MANAGING DIRECTOR, INVESTMENT BANKING	Y	NEW YORK, NY, United States

### Other Business Activities

This section includes information, if any, as provided by the broker regarding other business activities the broker is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious or fraternal and is recognized as tax exempt.

1) Global Direct Investments Associates LLC; not investments related; Fort Lauderdale, FL; management and financial consulting and advisory; chief executive officer and managing member; started Feb'2020, spend 80-100 hours/month of which 30-50 hours/month are during trading hours; manage and complete projects for various clients. 2) LFR Consulting & Advisory, LLC; not investments related, based at home: Pembroke Pines, FL; sole-proprietorship personal LLC, incorporated May 2019; engaged in management and financial consulting; spend about 30 hours/month, 20 of which are during the trading day.



## Disclosure Events

### What you should know about reported disclosure events:

1. All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.
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 broker is required to disclose a particular criminal event.
  - A customer dispute must involve allegations that a broker engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.
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3. **Disclosure events in BrokerCheck reports come from different sources:**
  - As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, brokerage firms and regulators. When more than one of these sources reports information for the same disclosure event, all 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.
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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 brokers and brokerage 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.

For your convenience, below is a matrix of the number and status of disclosure events involving this broker. Further information regarding these events can be found in the subsequent pages of this report. You also may wish to contact the broker to obtain further information regarding these events.

	Pending	Final	On Appeal
Regulatory Event	0	1	0



## Disclosure Event Details

When evaluating this information, please keep in mind that a disclosure event may be pending or involve allegations that are contested and have not been resolved or proven. The matter may, in the end, be withdrawn, dismissed, resolved in favor of the broker, or concluded through a negotiated settlement for certain business reasons (e.g., to maintain customer relationships or to limit the litigation costs associated with disputing the allegations) with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to CRD and therefore some of the specific data fields contained in the report may be blank if the information was not provided to CRD.

### Regulatory - Final

This type of disclosure event may involve (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory such as the Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of a broker's authority to act as an attorney, accountant, or federal contractor.

#### Disclosure 1 of 1

**Reporting Source:** Regulator

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:**

**Date Initiated:** 07/20/2021

**Docket/Case Number:** [2016047624501](#)

**Employing firm when activity occurred which led to the regulatory action:** FUSION ANALYTICS SECURITIES LLC

**Product Type:** Other: Unspecified Securities

**Allegations:** Without admitting or denying the findings, Restrepo consented to the sanctions and to the entry of findings that he failed to reasonably establish and implement an anti-money laundering (AML) compliance program reasonably designed to detect and cause the reporting of suspicious activity as well as a reasonably designed customer identification program (CIP). The findings stated that this matter originated from FINRA's cycle examination of Restrepo's member firm. The findings also stated that, while a significant portion of the firm's business was devoted to the deposit and liquidation of microcap securities for customers, Restrepo failed to reasonably tailor the firm's AML procedures and CIP to this business and failed to reasonably detect and investigate known red flags of suspicious activity associated with those transactions. As the firm's AML



compliance officer, Restrepo did not put in place a reasonable process to identify red flags specific to microcap issuers, to identify higher risk accounts, or to designate accounts that displayed certain AML-related red flags as high risk accounts. Restrepo also did not implement any reasonable system or controls to identify patterns of suspicious activity over time. As a result, the firm failed to detect and report potentially suspicious trading activity. Restrepo was also responsible for enforcing the requirement to conduct annual independent tests of the AML program, but failed to ensure that the firm conducted an AML audit. In addition, Restrepo failed to reasonably establish, maintain, and enforce a supervisory system, including written supervisory procedures (WSPs), reasonably designed to achieve compliance with Section 5 of the Securities Act for sales of unregistered shares of microcap stocks. Restrepo failed to conduct reasonable reviews to determine whether securities deposited into customer accounts were restricted and to ensure that securities sold were registered or exempt from registration. Rather, Restrepo permitted the registered representatives handling the customer accounts, who were not principals, to have sole responsibility for determining whether sales of restricted securities were eligible for an exemption from registration. Under the firm's WSPs, when a customer sought to resell a block of a little-known security or deposit unregistered securities or large blocks of microcap stocks, the registered representative was required to make inquiries to determine whether the sale may be illegal and get a completed questionnaire from the customer. The broker on the account and Restrepo, the designated principal, were tasked with reviewing the questionnaire and raising any concerns or suspicions to the chief compliance officer and AML compliance officer. With no system to verify the accuracy of the materials customers provided to the firm, Restrepo relied solely on the brokers to review the questionnaires and the supporting materials their customers submitted. As a result, Restrepo failed to identify certain errors and red flags that would have been apparent upon a reasonable review of the documentation on its face. The findings also included that Restrepo failed to reasonably supervise two private placements sold by the firm's registered representatives. In the first private placement, Restrepo failed to ensure the firm and its registered representatives had a reasonable basis to recommend the bonds. In addition, Restrepo was aware of but failed to reasonably investigate red flags indicating that the firm and its representatives made material misrepresentations and omissions to investors. In the second private placement, Restrepo failed to conduct or ensure the firm conducted a reasonable investigation of the offering and also failed to maintain or ensure the firm maintained documentation of any investigation performed, other than the filed containing documents from the issuer.

**Current Status:**

Final

**Resolution:**

Acceptance, Waiver &amp; Consent(AWC)



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

No

**Resolution Date:**

07/20/2021

**Sanctions Ordered:**

Requalification

Suspension

Other: In light of Restrepo's financial status, no monetary sanction has been imposed.

**If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?**

No

**(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?**



**(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or**

**(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?**

**Sanction 1 of 1**

<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	Any Principal Capacity
<b>Duration:</b>	Six Months
<b>Start Date:</b>	08/02/2021
<b>End Date:</b>	02/01/2022



**Requalification 1 of 1**

<b>Requalification Type:</b>	Requalification by Exam
<b>Length of time given to requalify:</b>	N/A
<b>Type of exam required :</b>	Requisite examination or examinations
<b>Has condition been satisfied:</b>	No

## End of Report



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