

BrokerCheck Report

JORGE MARTIN RAMOS LANDERO

CRD# 2269682

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

Please contact FINRA with any concerns.

About BrokerCheck®



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

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

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

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

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

- **How current is this information?**

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

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

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

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

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

Thank you for using FINRA BrokerCheck.



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



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

**JORGE M. RAMOS LANDERO**

CRD# 2269682

Currently employed by and registered with the following Firm(s):

IA FINAMEX ASSET MANAGEMENT, LLC
 2700 POST OAK BLVD.
 22ND FLOOR; SUITE 22-122
 HOUSTON, TX 77056
 CRD# 304260
 Registered with this firm since: 01/08/2020

B FINAMEX INTERNATIONAL, LLC
 2700 POST OAK BLVD.
 22ND FLOOR, SUITE 22-122
 HOUSTON, TX 77056
 CRD# 301726
 Registered with this firm since: 04/20/2020

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 registered with:**

- 1 Self-Regulatory Organization
- 12 U.S. states and territories

This broker has passed:

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

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

- B INTERCAM SECURITIES, INC.**
 CRD# 146667
 MIAMI, FL
 12/2016 - 01/2017
- IA MONEX ASSET MANAGEMENT, INC.**
 CRD# 148123
 HOUSTON, TX
 08/2009 - 02/2015
- B MONEX SECURITIES, INC.**
 CRD# 30362
 HOUSTON, TX
 11/2003 - 01/2015

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 individual is currently registered with 1 SRO and is licensed in 12 U.S. states and territories through his or her employer.

Employment 1 of 2

Firm Name: **FINAMEX ASSET MANAGEMENT, LLC**
 Main Office Address: **2700 POST OAK BLVD.
 22ND FLOOR; SUITE 22-122
 HOUSTON, TX 77056**
 Firm CRD#: **304260**

	U.S. State/ Territory	Category	Status	Date
IA	Texas	Investment Adviser Representative	Approved	01/08/2020

Branch Office Locations

2700 POST OAK BLVD.
 22ND FLOOR; SUITE 22-122
 HOUSTON, TX 77056

Employment 2 of 2

Firm Name: **FINAMEX INTERNATIONAL, LLC**
 Main Office Address: **2700 POST OAK BLVD.
 22ND FLOOR, SUITE 22-122
 HOUSTON, TX 77056**
 Firm CRD#: **301726**

	SRO	Category	Status	Date
B	FINRA	General Securities Principal	Approved	04/20/2020
B	FINRA	General Securities Representative	Approved	04/20/2020
B	FINRA	Investment Banking Representative	Approved	04/20/2020



Broker Qualifications

Employment 2 of 2, continued

	SRO	Category	Status	Date
B	FINRA	Registered Options Principal	Approved	04/20/2020
B	FINRA	Securities Trader	Approved	04/20/2020
B	FINRA	Operations Professional	Approved	04/24/2020
B	FINRA	Compliance Officer	Approved	06/08/2022

	U.S. State/ Territory	Category	Status	Date
B	California	Agent	Approved	04/10/2023
B	Connecticut	Agent	Approved	04/21/2023
B	District of Columbia	Agent	Approved	07/10/2023
B	Florida	Agent	Approved	07/14/2023
B	Illinois	Agent	Approved	09/19/2023
B	Maryland	Agent	Approved	04/25/2023
B	Massachusetts	Agent	Approved	09/25/2023
B	Michigan	Agent	Approved	05/26/2023
B	Minnesota	Agent	Approved	06/14/2023
B	New Jersey	Agent	Approved	05/26/2023
B	New York	Agent	Approved	02/16/2023
B	Texas	Agent	Approved	04/23/2020

Branch Office Locations

FINAMEX INTERNATIONAL, LLC
 2700 POST OAK BLVD.
 22ND FLOOR, SUITE 22-122
 HOUSTON, TX 77056

Broker Qualifications



Employment 2 of 2, continued

FINAMEX INTERNATIONAL, LLC
2700 POST OAK BLVD.
22ND FLOOR, SUITE 22-122
HOUSTON, TX 77056



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. A passed exam or exam waiver does not permit a broker to do business without an active SRO or state registration.

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

Principal/Supervisory Exams

Exam	Category	Date
B Compliance Officer Examination	Series 14	01/02/2023
B Registered Options Principal Examination	Series 4	05/01/1996
B General Securities Principal Examination	Series 24	04/29/1993

General Industry/Product Exams

Exam	Category	Date
B Operations Professional Examination	Series 99TO	01/02/2023
B National Commodity Futures Examination	Series 3	11/01/2019
B Securities Trader Exam	Series 57TO	09/20/2019
B Investment Banking Registered Representative Examination	Series 79TO	07/26/2019
B Securities Industry Essentials Examination	SIE	01/27/2017
B General Securities Representative Examination	Series 7	03/30/1993

State Securities Law Exams

Exam	Category	Date
B IA Uniform Combined State Law Examination	Series 66	06/21/2019
IA Uniform Investment Adviser Law Examination	Series 65	07/09/2009
B Uniform Securities Agent State Law Examination	Series 63	06/13/1995

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at

Broker Qualifications



Industry Exams this Broker has Passed, continued

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 12/2016 - 01/2017	INTERCAM SECURITIES, INC.	146667	MIAMI, FL
IA 08/2009 - 02/2015	MONEX ASSET MANAGEMENT, INC.	148123	MEXICO, Mexico
B 11/2003 - 01/2015	MONEX SECURITIES, INC.	30362	HOUSTON, TX
B 01/2001 - 08/2003	INVEX, INC.	30032	CORAL GABLES, FL
B 03/1999 - 01/2000	CBI INTERNATIONAL SECURITIES, INC.	30362	HOUSTON, TX
B 08/1993 - 09/1998	AFIN SECURITIES INTERNATIONAL, LTD.	30648	HOUSTON, TX

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
03/2019 - Present	FINAMEX ASSET MANAGEMENT, LLC	CCO/CEO/COO	Y	HOUSTON, TX, United States
03/2019 - Present	FINAMEX INTERNATIONAL, LLC	PRESIDENT/CCO	Y	HOUSTON, TX, United States
03/2019 - 06/2021	CASA DE BOLSA FINAMEX S.A.B. DE C.V.	SUBDIRECTOR BROKER-DEALER	Y	MEXICO CITY, Mexico
01/2017 - 02/2019	INTERCAM CASA DE BOLSA	DIRECTOR	Y	MEXICO, Mexico
12/2016 - 01/2017	INTERCAM SECURITIES	REGISTERED REPRESENTATIVE	Y	MEXICO CITY, Mexico
01/2015 - 12/2016	UNEMPLOYED	UNEMPLOYED	N	MEXICO CITY, Mexico

Registration and Employment History



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.

No information reported.

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.
 -
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:	Other: N/A
Date Initiated:	12/04/2013
Docket/Case Number:	2011025617702
Employing firm when activity occurred which led to the regulatory action:	MONEX SECURITIES, INC.
Product Type:	Other: UNSPECIFIED SECURITIES AND BANKING PRODUCTS
Allegations:	FINRA RULE 2010, NASD RULES 1031, 3010: A MEMBER FIRM ENTERED INTO A DEALER TO DEALER ADMINISTRATIVE SERVICING AND SUPERVISORY SUPPORT AGREEMENT WITH ITS MEXICAN PARENT COMPANY, WHICH WAS EXECUTED BY ITS PRESIDENT AND CHIEF COMPLIANCE OFFICER (CCO) RAMOS LANDERO ON BEHALF OF THE FIRM. THE FIRM PAID TRANSACTION-RELATED COMPENSATION TO FOREIGN PERSONS ASSOCIATED WITH ITS PARENT COMPANY WHO REFERRED NON-UNITED STATES CUSTOMERS TO OPEN ACCOUNTS AT THE FIRM AND TRANSMITTED ORDERS FOR THOSE ACCOUNTS. NONE OF THESE INDIVIDUALS, THE CATEGORIES OF EMPLOYEES ASSOCIATED WITH THE PARENT COMPANY, HELD ANY LICENSES ISSUED BY FINRA OR ANY OTHER



UNITED STATES REGULATOR, AND NONE OF THEM WERE REGISTERED WITH THE FIRM UNDER ANY OF THE CATEGORIES OUTLINED IN NASD RULE 1032 OR AS FOREIGN ASSOCIATES UNDER NASD RULE 1100. MOREOVER, NONE OF THESE INDIVIDUALS MET THE REQUIREMENTS FOR EXEMPTION FROM REGISTRATION FOR FOREIGN FINDERS THAT ARE SET FORTH IN NASD RULE 1060(B). THEIR ACTIVITIES FOR THE FIRM'S PAYMENT OF TRANSACTION-RELATED COMPENSATION TO NONREGISTERED FOREIGN PERSONS DID NOT QUALIFY, AND THEIR ACTIVITIES AS FOREIGN FINDERS WERE NOT LIMITED SOLELY TO MAKING THE INITIAL CUSTOMER INTRODUCTION. THE FIRM HAD CUSTOMERS' ACCOUNTS THAT WERE REFERRED BY THE CATEGORIES OF EMPLOYEES ASSOCIATED WITH THE PARENT COMPANY, AND, IN 2011 ALONE, THE FIRM EARNED OVER \$6.3 MILLION IN REVENUE FROM THESE ACCOUNTS. FROM THAT REVENUE, IT PAID OVER \$1.6 MILLION DIRECTLY TO THESE EMPLOYEES OF THE PARENT COMPANY, PER THE PARENT COMPANY'S INSTRUCTIONS, OR TO THE PARENT COMPANY ITSELF. IN ORDER TO PAY TRANSACTION-RELATED COMPENSATION TO FOREIGN INDIVIDUALS, THE FOREIGN INDIVIDUALS MUST EITHER LIMIT THEIR ACTIVITY TO PROVIDING INITIAL REFERRALS OF FOREIGN CUSTOMERS, OR REGISTER AS GENERAL SECURITIES REPRESENTATIVES OR AS FOREIGN ASSOCIATES. HERE, THE PARENT COMPANY'S INDIVIDUALS WHO RECEIVED TRANSACTION-RELATED COMPENSATION DID NEITHER. MOREOVER, UNDER THE AGREEMENT, THE FIRM ATTEMPTED TO DELEGATE MANY OF ITS SUPERVISORY DUTIES TO ITS PARENT COMPANY, INCLUDING SUPERVISION OVER THE ACTIVITIES OF THE FOREIGN ASSOCIATES AND THEIR INTERACTION WITH CUSTOMERS, AND SUPERVISION OVER WHETHER THEY WERE SUBJECT TO A STATUTORY DISQUALIFICATION UNDER THE U.S. SECURITIES LAWS. THROUGH THESE ACTIONS, THE FIRM AND RAMOS LANDERO FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM THAT IS REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE APPLICABLE SECURITIES LAWS. THE FIRM'S WRITTEN SUPERVISORY PROCEDURES (WSPS) INCLUDE A SECTION SPECIFICALLY PERTAINING TO THE AGREEMENT. THE WSPS DID NOT, HOWEVER, DISCUSS OR OUTLINE ANY PROCEDURES FOR DETERMINING WHETHER AN INTERNATIONAL OPERATIVE IS REQUIRED TO REGISTER IN THE U.S. AS A BROKER/DEALER OR FOREIGN ASSOCIATE OR FOR DETERMINING WHETHER AN INTERNATIONAL OPERATIVE IS SUBJECT TO DISQUALIFICATION AS DEFINED IN ARTICLE III, SECTION 4 OF FINRA'S BY-LAWS. THE FIRM'S WSPS ALSO INCLUDE A SECTION ON FOREIGN ASSOCIATES. THE WSPS DID NOT DISCUSS HOW THE FIRM WILL DETERMINE WHETHER AN INDIVIDUAL SHOULD BE REGISTERED EITHER UNDER NASD RULE 1031 OR AS A FOREIGN ASSOCIATE UNDER NASD RULE 1100. THE WSPS ALSO DID NOT ADDRESS WHO MAY PROPERLY RECEIVE TRANSACTION-BASED COMPENSATION.



Current Status:	Final
Resolution:	Decision & Order of Offer of Settlement
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:	12/30/2014
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Suspension
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

Sanction Type:	Suspension
Capacities Affected:	A PRINCIPAL CAPACITY
Duration:	45 DAYS
Start Date:	01/20/2015
End Date:	03/05/2015

**Monetary Sanction 1 of 1****Monetary Related Sanction:** Civil and Administrative Penalty(ies)/Fine(s)**Total Amount:** \$15,000.00**Portion Levied against individual:** \$15,000.00**Payment Plan:****Is Payment Plan Current:** Yes**Date Paid by individual:** 01/09/2015**Was any portion of penalty waived?** No**Amount Waived:****Regulator Statement**

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RAMOS LANDERO CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT ACTING THROUGH HIM, AS HIS MEMBER FIRM'S PRESIDENT AND CHIEF COMPLIANCE OFFICER, THE FIRM ENTERED INTO A DEALER TO DEALER ADMINISTRATIVE SERVICING AND SUPERVISORY SUPPORT AGREEMENT WITH ITS MEXICAN PARENT COMPANY, AND PAID TRANSACTION-RELATED COMPENSATION TO NONREGISTERED FOREIGN PERSONS WHO WERE ACTING IN A CAPACITY THAT REQUIRED REGISTRATION. MOREOVER, NONE OF THESE INDIVIDUALS MET THE REQUIREMENTS FOR EXEMPTION FROM REGISTRATION FOR FOREIGN FINDERS. IN ONE YEAR ALONE, THE FIRM EARNED OVER \$6.3 MILLION IN REVENUE FROM CUSTOMERS' ACCOUNTS THAT WERE REFERRED BY THESE INDIVIDUALS AND FROM THAT REVENUE, IT PAID OVER \$1.6 MILLION DIRECTLY TO THESE INDIVIDUALS PER THE PARENT COMPANY'S INSTRUCTIONS, OR TO THE PARENT COMPANY ITSELF. THE FINDINGS STATED THAT THE FIRM AND RAMOS LANDERO FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM THAT IS REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE APPLICABLE SECURITIES LAWS AND TO HAVE ADEQUATE WRITTEN PROCEDURES THAT ENSURED THESE INDIVIDUALS WERE EITHER NOT REQUIRED TO BE REGISTERED, OR THAT THEY WERE PROPERLY REGISTERED, BEFORE RECEIVING THIS COMPENSATION. FINE PAID IN FULL ON JANUARY 9, 2015.

Reporting Source: Broker**Regulatory Action Initiated By:** FINRA



Sanction(s) Sought: Other: N/A

Date Initiated: 12/04/2013

Docket/Case Number: [2011025617702](#)

Employing firm when activity occurred which led to the regulatory action: MONEX SECURITIES, INC.

Product Type: Other: UNSPECIFIED SECURITIES AND BANKING PRODUCTS

Allegations: FINRA ALLEGED IN A DECEMBER 4, 2013 COMPLAINT (THE "COMPLAINT") THAT FROM JANUARY 1, 2010 THROUGH AT LEAST MAY 31, 2012, MONEX SECURITIES, INC. ("THE FIRM"), ACTING THROUGH ITS PRESIDENT AND CHIEF COMPLIANCE OFFICER, JORGE MARTIN RAMOS LANDERO ("RAMOS"), ENTERED INTO A DEALER TO DEALER AGREEMENT WITH THE FIRM'S PARENT COMPANY, PURSUANT TO WHICH THE FIRM PAID TRANSACTION-RELATED COMPENSATION TO NON REGISTERED FOREIGN PERSONS WHO WERE ASSOCIATED WITH THE FIRM'S PARENT COMPANY, AND WHO ACTED IN CAPACITIES THAT REQUIRED REGISTRATION, IN VIOLATION OF NASD RULE 1031 AND FINRA RULE 2010. FINRA ALSO ALLEGED THAT DURING THIS SAME TIME-FRAME, THE FIRM AND RAMOS FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM AND PROCEDURES THAT REASONABLY ENSURED COMPLIANCE WITH APPLICABLE SECURITIES LAWS REGARDING ASSOCIATED PERSONS, IN VIOLATION OF NASD RULE 3010 AND FINRA RULE 2010.

Current Status: Final

Resolution: Decision & Order of Offer of Settlement

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: 12/30/2014

Sanctions Ordered: Civil and Administrative Penalty(ies)/Fine(s)
Suspension

Sanction 1 of 1

Sanction Type: Suspension

Capacities Affected: A PRINCIPAL CAPACITY



Duration: 45 DAYS
Start Date: 01/20/2015
End Date: 03/05/2015

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$15,000.00

Portion Levied against individual: \$15,000.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual: 01/09/2015

Was any portion of penalty waived? No

Amount Waived:

Broker Statement

THE MEXICAN BROKER-DEALER PARENT IS A FINANCIAL INTERMEDIARY AS SUCH TERM IS DEFINED IN THE MEXICAN SECURITIES MARKET LAW (LEY DEL MERCADO DE VALORES), AND IS AUTHORIZED BY THE COMISION NACIONAL BANCARIA Y DE VALORES (CNBV) TO ENGAGE IN BROKER-DEALER SECURITIES ACTIVITITES IN MEXICO AND THERE ARE NO RESTRICTIONS IN MEXICO ON A BROKERAGE FIRM OR ITS AGENTS TO PROVIDE INVESTMENT RECOMMENDATIONS RELATED TO FOREIGN SECURITIES TO ITS CUSTOMERS REGARDING. THE FINRA REQUIREMENT FOR THE MEXICAN BROKER-DEALER PARENT TO REGISTER ITS FOREIGN AGENTS WITH FINRA WOULD SUBJECT THE MEXICAN BROKER-DEALER PARENT TO BEING DEEMED AN OSJ OF THE FIRM, IN VIOLATION OF MEXICAN SECURITIES LAWS, WOULD VIOLATE MEXICAN SECURITIES AND PRIVACY LAWS, AND WOULD SUBJECT THE FOREIGN AGENTS TO CRIMINAL PROSECUTION IN MEXICO FOR SHARING CONFIDENTIAL CLIENT INFORAMTION FOR CUSTOMERS OF THE MEXICAN BROKER-DEALER PARENT THAT WERE NOT CLIENTS OF THE FIRM. THE COMPENSATION PAID BY THE FIRM TO THE FOREIGN AGENTS WAS COMPENSATRION EARNED BY THE MEXICAN BROKER-DEALER PARENT, PAID AT THE DIRECTION OF THE MEXICAN BROKER-DEALER PARENT, DID NOT VIOLATE ANY MEXICAN LAWS, RULES OR REGULATIONS AND THE FIRM RELIED UPON A LEGAL OPINION ISSUED BY COUNSEL TO THE MEXICAN BROKER-DEALER PARENT. RAMOS WAS SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN A PRINCIPAL CAPACITY

End of Report



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