

## BrokerCheck Report

**ADOLFO GONZALEZRUBIO**

CRD# 2385116

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Broker Qualifications	2 - 4
Registration and Employment History	6 - 7
Disclosure Events	8



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](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).



## ADOLFO GONZALEZRUBIO

CRD# 2385116

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

**IA IPG INVESTMENT ADVISORS, LLC**  
 501 WEST BROADWAY  
 SUITE 1350  
 SAN DIEGO, CA 92101  
 CRD# 152990  
 Registered with this firm since: 01/11/2023

**B INVESTMENT PLACEMENT GROUP**  
 501 WEST BROADWAY  
 SUITE 1350  
 SAN DIEGO, CA 92101  
 CRD# 14458  
 Registered with this firm since: 11/10/1993

## 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:

- 2 Self-Regulatory Organizations
- 2 U.S. states and territories

#### This broker has passed:

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

### Registration History

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

**IA IPG INVESTMENT ADVISORS, LLC**  
 CRD# 152990  
 SAN DIEGO, CA  
 07/2010 - 12/2022

### 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
Customer Dispute	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 2 SROs and is licensed in 2 U.S. states and territories through his or her employer.**

### Employment 1 of 2

Firm Name: **INVESTMENT PLACEMENT GROUP**

Main Office Address: **501 WEST BROADWAY  
SUITE 1350  
SAN DIEGO, CA 92101**

Firm CRD#: **14458**

	SRO	Category	Status	Date
B	FINRA	General Securities Representative	Approved	11/10/1993
B	FINRA	General Securities Principal	Approved	07/02/2003
B	FINRA	Investment Banking Representative	Approved	05/03/2010
B	FINRA	Investment Banking Principal	Approved	10/01/2018
B	Nasdaq Stock Market	General Securities Principal	Approved	07/12/2006
B	Nasdaq Stock Market	General Securities Representative	Approved	07/12/2006

	U.S. State/ Territory	Category	Status	Date
B	California	Agent	Approved	07/08/2010
B	New York	Agent	Approved	03/28/2011

### Branch Office Locations

**INVESTMENT PLACEMENT GROUP**  
501 WEST BROADWAY  
SUITE 1350  
SAN DIEGO, CA 92101



## Broker Qualifications

### Employment 2 of 2

Firm Name: **IPG INVESTMENT ADVISORS, LLC**  
Main Office Address: **501 WEST BROADWAY  
SUITE 1350  
SAN DIEGO, CA 92101**  
Firm CRD#: **152990**

U.S. State/ Territory		Category	Status	Date
IA	California	Investment Adviser Representative	Approved	01/11/2023

### Branch Office Locations

501 WEST BROADWAY  
SUITE 1350  
SAN DIEGO, CA 92101

---



## 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 1 principal/supervisory exam, 3 general industry/product exams, and 1 state securities law exam.**

### Principal/Supervisory Exams

Exam	Category	Date
<b>B</b> General Securities Principal Examination	Series 24	07/01/2003

### General Industry/Product Exams

Exam	Category	Date
<b>B</b> Investment Banking Registered Representative Examination	Series 79TO	01/02/2023
<b>B</b> Securities Industry Essentials Examination	SIE	10/01/2018
<b>B</b> General Securities Representative Examination	Series 7	11/09/1993

### State Securities Law Exams

Exam	Category	Date
<b>B IA</b> Uniform Combined State Law Examination	Series 66	06/30/2010

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>IA</b> 07/2010 - 12/2022	IPG INVESTMENT ADVISORS, LLC	152990	SAN DIEGO, CA

### 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
03/2010 - Present	IPG INVESTMENT ADVISORS LLC	MEMBER/MANAGER/ ADVISOR	Y	SAN DIEGO, CA, United States
10/1990 - Present	INVESTMENT PLACEMENT GROUP	CEO	Y	SAN DIEGO, CA, 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.

MANAGING MEMBER OF IPG INVESTMENT ADVISORS, LLC. - INVESTMENT RELATED - SEC REGISTERED IAR UNDER COMMON CONTROL AND DEVOTES ABOUT 20 HOURS A WEEK AND UP TO 4 HOURS A DAY TO THIS BUSINESS.

DIRECTOR OF INVESTMENT PLACEMENT COMMODITIES - INVESTMENT RELATED - NFA REGISTERED FUTURES AND COMMODITIES BROKER UNDER COMMON CONTROL AND DEVOTES ABOUT A FEW HOURS A WEEK AND POSSIBLY UP TO 1 HOURS A DAY DURING TRADING HOURS TO THIS BUSINESS.

PORTFOLIO MANAGER TO VARIOUS PRIVATE POOLED INVESTMENT ENTITIES - INVESTMENT RELATED - UNDER RIA UNDER COMMON CONTROL AND DEVOTES ABOUT 20 HOURS A WEEK AND UP TO 4 HOURS A DAY TO THIS BUSINESS.

SOLE MEMBER AGRB HOLDINGS, LLC. - NON-INVESTMENT RELATED - PRIVATE INVESTMENT VEHICLE ESTABLISHED TO MANAGE COMMERCIAL REAL ESTATE INVESTMENTS - PLANS TO DEVOTE 1 HOUR A MONTH NONE DURING TRADING HOURS

SOLE MEMBER PGR HOLDINGS, LLC. - NON-INVESTMENT RELATED - PRIVATE INVESTMENT VEHICLE ESTABLISHED TO MANAGE COMMERCIAL REAL ESTATE INVESTMENTS - PLANS TO DEVOTE 1 HOUR A MONTH NONE DURING TRADING HOURS





## Registration and Employment History

### Other Business Activities, continued

REPRESENT FAMILY MEMBERS AS DIRECTOR IN OTAY COMMERCIAL PARTNERS, LP - NON-INVESTMENT RELATED - DIRECTOR OF FAMILY ENTERPRISE ESTABLISHED TO INVEST IN COMMERCIAL REAL ESTATE PROJECTS - PLANS TO DEVOTE A FEW HOURS A MONTH NONE DURING TRADING HOURS

PRESIDENT, CEO AND SECRETARY OF OTAY COMMERCIAL CENTER CORP - NON-INVESTMENT RELATED - ZERO PARTICIPATION - ESTABLISHED TO MANAGE REAL ESTATE PROJECTS AND HOLDINGS OF VARIOUS RELATED ENTITIES - PLANS TO DEVOTE A FEW HOURS A MONTH NONE DURING TRADING HOURS

MANAGING MEMBER OF OCC / 3900, LLC. - NON-INVESTMENT RELATED - ENTERPRISE ESTABLISHED TO INVEST AS A PASSIVE INVESTOR IN COMMERCIAL REAL ESTATE PROJECTS - PLANS TO DEVOTE A FEW HOURS A MONTH NONE DURING TRADING HOURS

GENERAL PARTNER OF BLUE POINT REAL ESTATE INVESTMENTS LLC. - NON-INVESTMENT RELATED - ESTABLISHED TO PARTICIPATE AS GENERAL PARTNER IN A REAL ESTATE INVESTMENT FUND. DUTIES INCLUDE REVIEW OF COMMERCIAL REAL ESTATE BUSINESS, PROSPECT INVESTORS AND PARTICIPATE IN QUARTERLY MEETINGS - PLANS TO DEVOTE A FEW HOURS A MONTH NONE DURING TRADING HOURS

SHAREHOLDER THROUGH IKAPITAL ADVISORS OF SC ASESORES EN INVERSIONES INDEPENDIENTES SA DE CV A REGISTERED MEXICAN ADVISOR LOCATED IN MEXICO CITY - NOT INVOLVED IN DAY TO DAY BUT ATTENDS QUARTLY MEETING AND MAY RECEIVE SHAREHOLDER COMPENSATION - PLANS TO DEVOTE A FEW HOURS A MONTH NONE DURING TRADING HOURS

MANAGER OF AGENA STAR LLC - NON-INVESTMENT RELATED - MANAGES AND REPRESENTS A CLOSE FAMILY FRIEND IN MATTERS OF REAL ESTATE PROPERTY MANAGEMENT DUTIES INCLUDE TO ENSURE THAT PROPERTY TAXES AND OTHER MISCELLANEOUS EXPENSES ARE PAID IN A TIMELY MANNER. PLANS TO DEVOTE A FEW HOURS A MONTH NONE DURING TRADING HOURS

ACTIVE BOARD MEMBER OF THE FOLLOWING ENTITIES: SMART BORDER COLITION, AEBC, GRUPO OPTIMA, WORLD TRADE CENTER GUADALAJARA

---

## 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.
  -
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
Customer Dispute	0	1	N/A



## 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

<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
<b>Sanction(s) Sought:</b>	Other: N/A
<b>Date Initiated:</b>	12/23/2011
<b>Docket/Case Number:</b>	3-14677
<b>Employing firm when activity occurred which led to the regulatory action:</b>	INVESTMENT PLACEMENT GROUP
<b>Product Type:</b>	No Product
<b>Allegations:</b>	SEC ADMIN RELEASE 34-66055; IA RELEASE 3343, DECEMBER 23, 2011: THE SECURITIES AND EXCHANGE COMMISSION ("COMMISSION") DEEMED IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE PROCEEDINGS BE INSTITUTED PURSUANT TO SECTION 15(B) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND SECTIONS 203(E) AND 203(F) OF THE INVESTMENT ADVISERS ACT OF 1940 ("ADVISERS ACT") AGAINST ADOLFO GONZALEZ-RUBIO ("GONZALEZ-RUBIO") AND HIS EMPLOYER, A BROKER-DEALER AND INVESTMENT ADVISER (COLLECTIVELY "RESPONDENTS").
	THE PROCEEDINGS AROSE OUT OF THE FAILURE REASONABLY TO



SUPERVISE A FORMER REGISTERED REPRESENTATIVE ("RR") AND TRADER WHO ENGAGED IN A FRAUDULENT INTERPOSITIONING SCHEME. THE FIRM WAS THE RR'S EMPLOYER, AND GONZALEZ-RUBIO, THEN THE FIRM'S CHIEF OPERATING OFFICER, WAS THE RR'S DIRECT SUPERVISOR. FROM APPROXIMATELY JANUARY THROUGH NOVEMBER 2008 ("RELEVANT PERIOD"), WHILE THE RR WAS ASSOCIATED WITH THE FIRM, HE PERPETRATED A FRAUDULENT INTERPOSITIONING SCHEME INVOLVING A MEXICAN INVESTMENT ADVISER, AND UTILIZING A SEPARATE MEXICAN BROKERAGE FIRM. THE RR, ACTING IN CONCERT WITH THE MEXICAN INVESTMENT ADVISER, VIOLATED SECTION 17(A) OF THE SECURITIES ACT OF 1933 ("SECURITIES ACT") AND SECTION 10(B) OF THE EXCHANGE ACT AND RULE 10B-5 THEREUNDER BY NEEDLESSLY INTERPOSING THE MEXICAN BROKERAGE FIRM INTO SECURITIES TRANSACTIONS BETWEEN THE FIRM AND THE MEXICAN INVESTMENT ADVISER'S INSTITUTIONAL CLIENTS, INCLUDING FOUR MEXICAN PENSION FUNDS. AS A RESULT OF THE RR'S MISCONDUCT, THE PENSION FUNDS PAID APPROXIMATELY \$65 MILLION MORE FOR CERTAIN CREDIT-LINKED NOTES THAN THEY WOULD HAVE HAD THE MEXICAN BROKERAGE FIRM NOT BEEN UNNECESSARILY INTERPOSED AS A "MIDDLEMAN." THE FIRM AND RR EACH RECEIVED MORE THAN \$6 MILLION AS A RESULT OF THE RR'S FRAUDULENT SCHEME.

THE RR'S FRAUDULENT SCHEME WENT UNDETECTED BY THE FIRM DUE TO ITS FAILURE TO ESTABLISH ADEQUATE POLICIES AND PROCEDURES AND A SYSTEM FOR IMPLEMENTING THOSE PROCEDURES WHICH WOULD REASONABLY BE EXPECTED TO PREVENT AND DETECT INTERPOSITIONING BY ITS TRADERS. DURING THE RELEVANT PERIOD, GONZALEZ-RUBIO WAS DIRECTLY RESPONSIBLE FOR SUPERVISING THE RR AND OVERSEEING THE TRADING ROOM. GONZALEZ-RUBIO, HOWEVER, DELEGATED SUPERVISORY OVERSIGHT OF THE TRADING TO THE RR, WHICH EFFECTIVELY ALLOWED THE RR TO SUPERVISE HIMSELF. FURTHER, GONZALEZ-RUBIO FAILED TO RESPOND TO RED FLAGS REGARDING THE RR'S FRAUDULENT SCHEME, INCLUDING A DRAMATIC RISE IN REVENUE RESULTING FROM THE INTERPOSITIONED TRANSACTIONS. AS A RESULT, GONZALEZ-RUBIO FAILED REASONABLY TO SUPERVISE THE RR WITHIN THE MEANING OF SECTION 15(B)(4)(E) AS INCORPORATED BY SECTION 15(B)(6) OF THE EXCHANGE ACT AND SECTION 203(E)(C) OF THE ADVISERS ACT.

DURING THE RELEVANT PERIOD, GONZALEZ-RUBIO, THE FIRM'S CHIEF OPERATING OFFICER, WAS DIRECTLY RESPONSIBLE FOR SUPERVISING THE RR AND OVERSEEING THE TRADING ROOM. GONZALEZ-RUBIO FAILED REASONABLY TO SUPERVISE THE RR WITH A VIEW TOWARDS PREVENTING THE RR'S ANTIFRAUD VIOLATIONS BECAUSE HE UNREASONABLY DELEGATED OVERSIGHT OF ACTIVITY IN THE FIRM PROPRIETARY ACCOUNT TO THE RR, WHICH RESULTED IN THE RR



EFFECTIVELY SUPERVISING HIMSELF. GONZALEZ-RUBIO KNEW THAT NO ONE EXCEPT THE RR EXECUTED TRADES FOR THE MEXICAN INVESTMENT ADVISER. WHILE IN RESPONSE TO GONZALEZ-RUBIO'S DAILY INQUIRIES, THE RR REPEATEDLY ASSURED GONZALEZ-RUBIO VERBALLY THAT EVERYTHING WAS FINE WITH THE MEXICAN INVESTMENT ADVISER, GONZALEZ-RUBIO DID NOT INDEPENDENTLY REVIEW MEXICAN INVESTMENT ADVISER'S OVERALL TRADING ACTIVITY IN THE FIRM PROPRIETARY ACCOUNT. AS A RESULT, THE WAS ABLE TO USE THE FIRM PROPRIETARY ACCOUNT TO CARRY OUT THE INTERPOSITIONING SCHEME AND CHARGE ADDITIONAL MARKUPS WITHOUT DETECTION.

GONZALEZ-RUBIO ALSO FAILED REASONABLY TO SUPERVISE THE RR BECAUSE HE FAILED TO RESPOND TO RED FLAGS THAT COULD HAVE LED TO DISCOVERY OF THE RR'S MISCONDUCT.

**Current Status:**

Final

**Resolution:**

Order

**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:**

12/23/2011

**Sanctions Ordered:**

Suspension

Other: UNDERTAKING TO PROVIDE TO THE COMMISSION, WITHIN 15 DAYS AFTER THE END OF THE THREE-MONTH SUSPENSION PERIOD, AN AFFIDAVIT THAT HE HAS COMPLIED FULLY WITH THE SANCTIONS.

**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?**

Yes



**(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?**

No

**(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**

No



**(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?**

Yes

#### Sanction 1 of 3

**Sanction Type:**

Suspension

**Capacities Affected:**

ASSOCIATION IN A SUPERVISORY CAPACITY WITH ANY BROKER, DEALER OR INVESTMENT ADVISER

**Duration:**

THREE (3) MONTHS

**Start Date:**

01/02/2012

**End Date:**

04/01/2012

#### Sanction 2 of 3

**Sanction Type:**

Suspension

**Capacities Affected:**

ASSOCIATION IN A SUPERVISORY CAPACITY WITH ANY NATIONALLY RECOGNIZED STATISTICAL RATING ORGANIZATION

**Duration:**

THREE (3) MONTHS

**Start Date:**

01/02/2012

**End Date:**

04/01/2012

#### Sanction 3 of 3

**Sanction Type:**

Suspension

**Capacities Affected:**

ASSOCIATION IN A SUPERVISORY CAPACITY WITH ANY MUNICIPAL SECURITIES DEALER, MUNICIPAL ADVISER OR TRANSFER AGENT

**Duration:**

THREE (3) MONTHS



**Start Date:** 01/02/2012

**End Date:** 04/01/2012

**Regulator Statement**

IN ANTICIPATION OF THE INSTITUTION OF THE PROCEEDINGS, RESPONDENT SUBMITTED AN OFFER OF SETTLEMENT (THE "OFFER"), WHICH THE COMMISSION DETERMINED TO ACCEPT. SOLELY FOR THE PURPOSE OF THE 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 HIM AND THE SUBJECT MATTER OF THE PROCEEDINGS, WHICH ARE ADMITTED, RESPONDENT CONSENTS TO THE ENTRY OF THE ORDER INSTITUTING ADMINISTRATIVE PROCEEDINGS PURSUANT TO SECTION 15(B) OF THE SECURITIES EXCHANGE ACT OF 1934 AND SECTIONS 203(E) AND 203(F) OF THE INVESTMENT ADVISERS ACT OF 1940, MAKING FINDINGS, AND IMPOSING REMEDIAL SANCTIONS ("ORDER").

THE COMMISSION DEEMED IT APPROPRIATE, AND IN THE PUBLIC INTEREST, TO IMPOSE THE SANCTIONS AGREED TO IN RESPONDENT'S OFFER. ACCORDINGLY, PURSUANT TO SECTION 15(B) OF THE EXCHANGE ACT AND SECTIONS 203(E) AND 203(F) OF THE ADVISERS ACT, IT IS HEREBY ORDERED THAT: GONZALEZ-RUBIO BE SUSPENDED FROM ASSOCIATION IN A SUPERVISORY CAPACITY WITH ANY BROKER, DEALER, INVESTMENT ADVISER, MUNICIPAL SECURITIES DEALER, MUNICIPAL ADVISER, TRANSFER AGENT, OR NATIONALLY RECOGNIZED STATISTICAL RATING ORGANIZATION FOR A PERIOD OF THREE (3) MONTHS, EFFECTIVE ON THE SECOND MONDAY FOLLOWING THE ENTRY OF THE ORDER. GONZALEZ-RUBIO SHALL COMPLY WITH THE UNDERTAKING.

**Reporting Source:** Broker

**Regulatory Action Initiated By:** UNITED STATES SECURITIES AND EXCHANGE COMMISSION

**Sanction(s) Sought:** Suspension  
Other: SUSPENSION FOR 3 MONTHS RELATES TO ACTING IN A SUPERVISORY CAPACITY ONLY

**Date Initiated:** 12/23/2011

**Docket/Case Number:** ADMINISTRATIVE PROCEEDING FILE NUMBER 3-14677





**Employing firm when activity occurred which led to the regulatory action:**

INVESTMENT PLACEMENT GROUP

**Product Type:**

Other: CREDIT LINKED NOTES

**Allegations:**

THE SECURITIES AND EXCHANGE COMMISSION DEEMED IT APPROPRIATE THAT PUBLIC ADMINISTRATIVE PROCEEDINGS BE INSTITUTED PURSUANT TO SECTION 15B OF THE SECURITIES AND EXCHANGE ACT OF 1934 AND SECTION 203(E) AND 203(F) OF THE INVESTMENT ADVISERS ACT OF 1940 AGAINST ADOLFO GONZALEZ-RUBIO AND HIS EMPLOYER, A BROKER DEALER AND INVESTMENT ADVISER. WITHOUT ADMITTING OR DENYING ALLEGATIONS, RESPONDENT CONSENTED TO AN ADMINISTRATIVE ORDER BASED ON ALLEGATIONS HE REASONABLY FAILED TO SUPERVISE A FORMER REGISTERED REPRESENTATIVE AND TRADER WHO ENGAGED IN A FRAUDULENT INTERPOSITIONING SCHEME. DURING THE RELEVANT PERIOD (JANUARY 2008 THROUGH NOVEMBER OF 2008) WHILE THE RR WAS ASSOCIATED WITH THE FIRM, THE RR PERPETRATED A FRAUDULENT INTERPOSITIONING SCHEME INVOLVING A MEXICAN INVESTMENT ADVISER AND UTILIZING A SEPARATE MEXICAN BROKERAGE FIRM, THE RR ACTING IN CONCERT WITH THE MEXICAN INVESTMENT ADVISER VIOLATED SECTION 17 (A) OF THE SECURITIES ACT OF 1933 ("SECURITIES ACT") AND SECTION 10(B) OF THE EXCHANGE ACT AND RULE 10B-5 THEREUNDER BY INTERPOSITIONING THE MEXICAN BROKERAGE FIRM BETWEEN THE FIRM AND THE MEXICAN INVESTMENT ADVISER'S INSTITUTIONAL CLIENTS. DURING THE RELEVANT PERIOD MR. GONZALEZ-RUBIO WAS DIRECTLY RESPONSIBLE FOR SUPERVISING THE RR AND OVERSEEING THE TRADING ROOM, MR. GONZALEZ-RUBIO, HOWEVER DELEGATED SUPERVISORY OVERSIGHT OF THE TRADING TO THE RR, WHICH EFFECTIVELY ALLOWED THE RR TO SUPERVISE HIMSELF AND THE CONDUCT WENT UNDETECTED BY THE FIRM DUE TO ITS FAILURE TO ESTABLISH ADEQUATE POLICIES AND PROCEDURES AND A SYSTEM FOR IMPLEMENTING THOSE PROCEDURES. MR. GONZALEZ-RUBIO FAILED TO PREVENT AND DETECT THE INTERPOSITIONING PATTERN AND TO RESPOND TO RED FLAGS REGARDING THE RR'S SCHEME. AS A RESULT, MR. GONZALEZ-RUBIO FAILED TO REASONABLY SUPERVISE THE RR WITHIN THE MEANING OF SECTION 15(B)(4)(E) AS INCORPORATED BY SECTION 15(B)(6) OF THE EXCHANGE ACT AND SECTION 203(E)(C) OF THE ADVISERS ACT. DURING THE RELEVANT PERIOD, MR. GONZALEZ-RUBIO, THEN THE CHIEF OPERATING OFFICER, WAS DIRECTLY RESPONSIBLE FOR SUPERVISING THE RR AND OVERSEEING THE TRADING ROOM. MR. GONZALEZ-RUBIO FAILED REASONABLY TO SUPERVISE THE RR WITH A VIEW TOWARDS PREVENTING THE RR'S ANTIFRAUD VIOLATIONS BECAUSE HE UNREASONABLY DELEGATED OVERSIGHT OF THE ACTIVITY IN THE FIRMS ACCOUNT TO THE RR, WHICH RESULTED IN THE RR SUPERVISING



HIMSELF, EXECUTING TRADES TO CARRY OUT THE INTERPOSITIONING SCHEME AND CHARGE ADDITIONAL MARK UPS WITHOUT DETECTION.

<b>Current Status:</b>	Final
<b>Resolution:</b>	Decision & Order of Offer of Settlement
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	Yes
<b>Resolution Date:</b>	12/23/2011
<b>Sanctions Ordered:</b>	Suspension Undertaking
<b>Sanction 1 of 1</b>	
<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	SUPERVISORY SUSPENSION OF 3 MONTHS
<b>Duration:</b>	3 MONTHS
<b>Start Date:</b>	01/02/2012
<b>End Date:</b>	04/01/2012



## Customer Dispute - Settled

This type of disclosure event involves a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit containing allegations of sale practice violations against the broker that resulted in a monetary settlement to the customer.

### Disclosure 1 of 1

<b>Reporting Source:</b>	Broker
<b>Employing firm when activities occurred which led to the complaint:</b>	INVESTMENT PLACEMENT GROUP
<b>Allegations:</b>	ENGAGING IN THE PURCHASE AND SALES OF SECURITIES WHICH WERE UNSUITABLE TO INVESTMENT OBJECTIVES. ALLEGED TRANSACTIONS OCCURRED BETWEEN MAY 2000 AND EARLY 2002 APPROXIMATELY
<b>Product Type:</b>	Debt - Corporate
<b>Other Product Type(s):</b>	LATIN AMERICAN GOVERNMENT AND CORPORATE DEBT
<b>Alleged Damages:</b>	\$250,000.00

### Customer Complaint Information

<b>Date Complaint Received:</b>	10/21/2002
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	03/27/2003
<b>Settlement Amount:</b>	\$186,510.43
<b>Individual Contribution Amount:</b>	\$0.00

### Arbitration Information

<b>Arbitration/Reparation Claim filed with and Docket/Case No.:</b>	NASD DISPUTE RESOLUTION CASE NO. 02-06361
<b>Date Notice/Process Served:</b>	10/27/2002
<b>Arbitration Pending?</b>	No
<b>Disposition:</b>	Settled
<b>Disposition Date:</b>	03/27/2003
<b>Monetary Compensation Amount:</b>	\$186,510.43



Individual Contribution Amount:	\$0.00
Broker Statement	FIRM DENIES ANY WRONG DOING. SETTLED FOR THE PURPOSE OF AVOIDING LITIGATION

## End of Report



**This page is intentionally left blank.**