

## BrokerCheck Report

**FABRIZIO DULCETTI NEVES**

CRD# 3244955

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Broker Qualifications	2 - 3
Registration and Employment History	5
Disclosure Events	6



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).

**FABRIZIO D. NEVES**

CRD# 3244955

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:**

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

**Registration History**

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

- B LATAM INVESTMENTS, LLC**  
CRD# 133163  
MIAMI, FL  
05/2006 - 11/2009
- B CAPITAL INVESTMENT SERVICES, INC.**  
CRD# 103781  
LAWRENCEVILLE, GA  
02/2005 - 05/2006
- B GLOBAL STRATEGIC INVESTMENTS, LLC**  
CRD# 117028  
BROOKLYN, NY  
10/2002 - 02/2005

**Disclosure Events**

This broker has been involved in one or more disclosure events involving certain final criminal matters, regulatory actions, civil judicial proceedings, or arbitrations or civil litigations.

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

**The following types of disclosures have been reported:**

Type	Count
Regulatory Event	2
Civil Event	1

**Investment Adviser Representative Information**

The information below represents the individual's record as a broker. For details on this individual's record as an investment adviser representative, visit the SEC's Investment Adviser Public Disclosure website at

<https://www.adviserinfo.sec.gov>

## Broker Qualifications



### Registrations

This section provides the self-regulatory organizations (SROs), states and U.S. territories the broker is currently registered and licensed with, the category of each registration, and the date on which the registration became effective. This section also provides, for each 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. 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 0 principal/supervisory exams, 1 general industry/product exam, and 1 state securities law exam.**

### Principal/Supervisory Exams

Exam	Category	Date
No information reported.		

### General Industry/Product Exams

Exam	Category	Date
<b>B</b> General Securities Representative Examination	Series 7	08/13/1999

### State Securities Law Exams

Exam	Category	Date
<b>B IA</b> Uniform Combined State Law Examination	Series 66	12/01/2000

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 securities firms:

Registration Dates	Firm Name	CRD#	Branch Location
<b>B</b> 05/2006 - 11/2009	LATAM INVESTMENTS, LLC	133163	MIAMI, FL
<b>B</b> 02/2005 - 05/2006	CAPITAL INVESTMENT SERVICES, INC.	103781	LAWRENCEVILLE, GA
<b>B</b> 10/2002 - 02/2005	GLOBAL STRATEGIC INVESTMENTS, LLC	117028	BROOKLYN, NY
<b>B</b> 06/2002 - 08/2002	UBS INTERNATIONAL INC.	107726	NEW YORK, NY
<b>B</b> 04/2000 - 06/2002	UBS PAINEWEBBER INC.	8174	WEEHAWKEN, NJ
<b>B</b> 08/1999 - 09/1999	THE PARTNERS FINANCIAL GROUP, INC.	31979	MIAMI, FL

### 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
10/2007 - Present	LATAM INVESTMENTS, LLC	REGISTERED REP	Y	MIAMI, FL, United States

# Disclosure Events



## What you should know about reported disclosure events:

- 1. **Disclosure events in BrokerCheck reports come from different sources:**
  - As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, their employing firms, and regulators. When more than one source reports information for the same disclosure event, all versions of the event will appear in the BrokerCheck report. The different versions are separated by a solid line with the reporting source labeled.

For your convenience, below is a matrix of the number and status of regulatory 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.

	Final	On Appeal
Regulatory Event	2	0
Civil Event	1	0





## Disclosure Event Details

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 involves a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations.

#### Disclosure 1 of 2

<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>	02/21/2014
<b>Docket/Case Number:</b>	3-15765
<b>Employing firm when activity occurred which led to the regulatory action:</b>	LATAM INVESTMENTS, LLC
<b>Product Type:</b>	Other: STRUCTURED NOTES
<b>Allegations:</b>	<p>SEC ADMIN RELEASE 34-71599, FEBRUARY 21, 2014:            THE SECURITIES AND EXCHANGE COMMISSION ("COMMISSION") DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE PROCEEDINGS BE, AND HEREBY ARE, INSTITUTED PURSUANT TO SECTION 15(B) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AGAINST FABRIZIO NEVES ("NEVES" OR "RESPONDENT").</p> <p>ON FEBRUARY 12, 2014, THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA ENTERED A JUDGMENT BY CONSENT AGAINST NEVES IN THE CIVIL CASE NO. 12-CV-23131, PERMANENTLY ENJOINING NEVES FROM FUTURE VIOLATIONS OF SECTION 17(A) OF THE SECURITIES ACT OF 1933 AND SECTION 10(B) OF THE EXCHANGE ACT AND EXCHANGE ACT RULE 10B-5, AND AIDING AND ABETTING VIOLATIONS OF SECTION 15(C) OF THE EXCHANGE ACT.</p>
<b>Current Status:</b>	Final
<b>Resolution:</b>	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:**

02/21/2014

**Sanctions Ordered:**

Bar (Permanent)

**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 2

<b>Sanction Type:</b>	Bar (Permanent)
<b>Capacities Affected:</b>	PARTICIPATING IN ANY OFFERING OF A PENNY STOCK
<b>Duration:</b>	Indefinite
<b>Start Date:</b>	02/21/2014
<b>End Date:</b>	

#### Sanction 2 of 2



<b>Sanction Type:</b>	Bar (Permanent)
<b>Capacities Affected:</b>	ASSOCIATION WITH ANY BROKER, DEALER, MUNICIPAL ADVISOR, OR NRSRO
<b>Duration:</b>	Indefinite
<b>Start Date:</b>	02/21/2014
<b>End Date:</b>	
<b>Regulator Statement</b>	<p>RESPONDENT HAS SUBMITTED AN OFFER OF SETTLEMENT (THE "OFFER") WHICH THE COMMISSION HAS DETERMINED TO ACCEPT.</p> <p>IT IS ORDERED THAT NEVES IS BARRED FROM ASSOCIATION WITH ANY BROKER, DEALER, MUNICIPAL ADVISOR, OR NATIONALLY RECOGNIZED STATISTICAL RATING ORGANIZATION; AND BARRED FROM PARTICIPATING IN ANY OFFERING OF A PENNY STOCK, INCLUDING: ACTING AS A PROMOTER, FINDER, CONSULTANT, AGENT OR OTHER PERSON WHO ENGAGES IN ACTIVITIES WITH A BROKER, DEALER OR ISSUER FOR PURPOSES OF THE ISSUANCE OR TRADING IN ANY PENNY STOCK, OR INDUCING OR ATTEMPTING TO INDUCE THE PURCHASE OR SALE OF ANY PENNY STOCK.</p>

#### Disclosure 2 of 2

<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	FINRA
<b>Sanction(s) Sought:</b>	Other: N/A
<b>Date Initiated:</b>	05/05/2010
<b>Docket/Case Number:</b>	<a href="#">2010022515501</a>
<b>Employing firm when activity occurred which led to the regulatory action:</b>	MARKWOOD CAPITAL ADVISORS, LLC (N/K/A LATAM INVESTMENTS, LLC)
<b>Product Type:</b>	No Product
<b>Allegations:</b>	FINRA RULES 2010, 8210: NEVES FAILED TO PROVIDE FINRA WITH REQUESTED DOCUMENTS.
<b>Current Status:</b>	Final
<b>Resolution:</b>	Acceptance, Waiver & 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:**

05/05/2010

**Sanctions Ordered:**

Bar (Permanent)

**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:** Bar (Permanent)

**Capacities Affected:** All Capacities

**Duration:**

**Start Date:** 05/05/2010

**End Date:**



**Regulator Statement**

WITHOUT ADMITTING OR DENYING THE FINDINGS, NEVES CONSENTED TO THE DESCRIBED SANCTION AND TO THE ENTRY OF FINDINGS; THEREFORE, HE IS BARRED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY.



## Civil - Final

This type of disclosure event involves an injunction issued by a court in connection with investment-related activity or a finding by a court of a violation of any investment-related statute or regulation.

### Disclosure 1 of 1

<b>Reporting Source:</b>	Regulator
<b>Initiated By:</b>	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
<b>Relief Sought:</b>	Civil and Administrative Penalty(ies)/Fine(s) Disgorgement Injunction
<b>Date Court Action Filed:</b>	08/29/2012
<b>Product Type:</b>	Other: STRUCTURED NOTES
<b>Type of Court:</b>	Federal Court
<b>Name of Court:</b>	UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA
<b>Location of Court:</b>	MIAMI, FLORIDA
<b>Docket/Case #:</b>	1:12-CV-23131
<b>Employing firm when activity occurred which led to the action:</b>	LATAM INVESTMENTS LLC
<b>Allegations:</b>	<p>SEC LITIGATION RELEASE 22462, AUGUST 29, 2012: THE SECURITIES AND EXCHANGE COMMISSION FILED A CIVIL FRAUD ACTION IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA AGAINST TWO FORMER BROKERS IN MIAMI FOR OVERCHARGING CUSTOMERS APPROXIMATELY \$36 MILLION BY USING HIDDEN MARKUP FEES ON STRUCTURED NOTE TRANSACTIONS.</p> <p>ACCORDING TO THE SEC'S COMPLAINT, FROM 2006 TO 2009, FABRIZIO NEVES CONDUCTED THE MARKUP SCHEME WHILE WORKING AT A BROKER-DEALER, WHICH IS NO LONGER IN BUSINESS. HE WAS ASSISTED BY ANOTHER INDIVIDUAL. THE PAIR DEFRAUDED TWO BRAZILIAN PUBLIC PENSION FUNDS AND A COLOMBIAN INSTITUTIONAL INVESTOR THAT PURCHASED FROM THE BROKER-DEALER THE STRUCTURED NOTES ISSUED BY MAJOR U.S. AND EUROPEAN COMMERCIAL BANKS. INSTEAD OF PURCHASING THE NOTES FOR HIS CUSTOMERS' ACCOUNTS FOR PRICES AROUND THE BANKS' ISSUANCE AMOUNTS - WHICH TOTALED APPROXIMATELY \$70 MILLION - IN MOST TRANSACTIONS NEVES FIRST TRADED THE NOTES WITH ONE OR MORE ACCOUNTS IN THE NAME OF</p>





OFFSHORE NOMINEE ENTITIES THAT HE AND THE OTHER INDIVIDUAL CONTROLLED. NEVES THEN SOLD THE NOTES TO HIS CUSTOMERS WITH UNDISCLOSED MARKUPS AS HIGH AS 67 PERCENT. NEVES HAD NO REASONABLE BASIS TO MARK UP THE PRICES THAT SIGNIFICANTLY.

THE SEC ALLEGES THAT TO CONCEAL THE EXCESSIVE MARKUPS THAT NEVES CHARGED CUSTOMERS, NEVES DIRECTED THE OTHER INDIVIDUAL TO ALTER THE BANKS' STRUCTURED NOTE TERM SHEETS IN HALF OF THE TRANSACTIONS BY EITHER WHITING OUT OR ELECTRONICALLY CUTTING AND PASTING THE MARKUP AMOUNTS OVER THE ACTUAL PRICE AND TRADE INFORMATION, AND THEN SENDING THE FORGED DOCUMENTS TO CUSTOMERS.

THE SEC FURTHER ALLEGES THAT AS A RESULT OF THE MARKUP SCHEME, THE BRAZILIAN FUNDS OVERPAID BY APPROXIMATELY \$24 MILLION AND THE COLOMBIAN INSTITUTIONAL INVESTOR OVERPAID BY APPROXIMATELY \$12 MILLION DUE TO THE UNDISCLOSED, EXCESSIVE FEES. NEVES ENJOYED A FINANCIAL BOON FROM THE SCHEME AS THE BROKER-DEALER PAID HIM MILLIONS OF DOLLARS IN INFLATED SALES COMMISSIONS FOR THE STRUCTURED NOTE TRANSACTIONS THAT HE MADE AT INFLATED PRICES.

AS ALLEGED IN THE SEC'S COMPLAINT, NEVES VIOLATED SECTION 17(A) OF THE SECURITIES ACT OF 1933, SECTION 10(B) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND RULE 10B-5 THEREUNDER, AND AIDED AND ABETTED THE BROKER-DEALER'S VIOLATIONS OF SECTION 15(C) OF THE EXCHANGE ACT. THE SEC'S COMPLAINT SEEKS DISGORGEMENT OF ILL-GOTTEN GAINS, FINANCIAL PENALTIES, AND INJUNCTIVE RELIEF AGAINST NEVES TO ENJOIN HIM FROM FUTURE VIOLATIONS OF THE FEDERAL SECURITIES LAWS.

<b>Current Status:</b>	Final
<b>Resolution:</b>	Judgment Rendered
<b>Resolution Date:</b>	02/10/2014
<b>Sanctions Ordered or Relief Granted:</b>	Civil and Administrative Penalty(ies)/Fine(s) Disgorgement Injunction Monetary Penalty other than Fines
<b>Capacities 1 of 1</b>	
<b>Capacities Affected:</b>	N/A
<b>Duration:</b>	PERMANENT



**Start Date:** 02/10/2014

**End Date:**

**Monetary Sanction 1 of 3**

**Monetary Sanction:** Disgorgement

**Total Amount:** \$4,200,000.00

**Portion against individual:** 4200000

**Date Paid:**

**Portion Waived:** No

**Amount Waived:**

**Monetary Sanction 2 of 3**

**Monetary Sanction:** Monetary Fine

**Total Amount:** \$150,000.00

**Portion against individual:** 150000

**Date Paid:**

**Portion Waived:** No

**Amount Waived:**

**Monetary Sanction 3 of 3**

**Monetary Sanction:** PREJUDGMENT INTEREST ON DISGORGEMENT

**Total Amount:** \$150,000.00

**Portion against individual:** 150000

**Date Paid:**

**Portion Waived:** No

**Amount Waived:**

**Regulator Statement**

ON FEBRUARY 10, 2014, A FINAL JUDGMENT BY CONSENT WAS ENTERED AGAINST NEVES WHEREIN HE WAS PERMANENTLY RESTRAINED AND ENJOINED FROM VIOLATING, DIRECTLY OR INDIRECTLY, SECTION 17(A) OF THE SECURITIES ACT OF 1933 ("SECURITIES ACT"), SECTION 10(B) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AND EXCHANGE ACT RULE 10B-5 THEREUNDER. IT WAS FURTHER ORDERED THAT NEVES BE PERMANENTLY RESTRAINED AND ENJOINED FROM AIDING AND ABETTING ANY VIOLATION OF SECTION 15(C)(1)(A) OF THE EXCHANGE ACT.



NEVES IS LIABLE FOR DISGORGEMENT OF \$4,200,000, PREJUDGMENT INTEREST IN THE AMOUNT OF \$150,000, AND A CIVIL PENALTY OF \$150,000.

## End of Report



**This page is intentionally left blank.**