

BrokerCheck Report

BARBARA DIANE HALPERN

CRD# 711919

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Broker Qualifications	2 - 4
Registration and Employment History	6 - 8
Disclosure Events	9



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



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.

BARBARA D. HALPERN

CRD# 711919

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

B GREENWICH CAPITAL PARTNERS, LLC
 135 MILBANK AVENUE WEST
 GREENWICH, CT 06830
 CRD# 305693
 Registered with this firm since: 01/21/2020

B RICHARD JAMES & ASSOCIATES, INC.
 75 Jackson Ave
 Syosett, NY 11791
 CRD# 169131
 Registered with this firm since: 10/19/2022

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
- 0 U.S. states and territories

This broker has passed:

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

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

- B APIFINY PRIME INC.**
 CRD# 304574
 NEW YORK, NY
 10/2021 - 01/2023
- B RICHARD JAMES & ASSOCIATES, INC.**
 CRD# 169131
 SYOSSET, NY
 05/2020 - 10/2022
- B COVA CAPITAL PARTNERS LLC**
 CRD# 109761
 SYOSSET, NY
 12/2019 - 05/2022

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	6



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 0 U.S. states and territories through his or her employer.

Employment 1 of 2

Firm Name: **GREENWICH CAPITAL PARTNERS, LLC**

Main Office Address: **135 MILBANK AVENUE WEST
GREENWICH, CT 06830**

Firm CRD#: **305693**

	SRO	Category	Status	Date
B	FINRA	Financial and Operations Principal	Approved	01/21/2020
B	FINRA	Operations Professional	Approved	07/15/2021

Branch Office Locations

This individual does not have any registered Branch Office where the individual is located.

Employment 2 of 2

Firm Name: **RICHARD JAMES & ASSOCIATES, INC.**

Main Office Address: **2 ROOSEVELT AVE.
STE 102
SYOSSET, NY 11791**

Firm CRD#: **169131**

	SRO	Category	Status	Date
B	FINRA	Financial and Operations Principal	Approved	10/19/2022
B	FINRA	Operations Professional	Approved	10/19/2022

Branch Office Locations

Broker Qualifications



Employment 2 of 2, continued

This individual does not have any registered Branch Office where the individual is located.



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, 2 general industry/product exams, and 0 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
B Financial and Operations Principal Examination	Series 27	08/20/1998
B Financial Principal Examination	F04	10/16/1980
B Municipal Securities Financial and Operations Principal Examination	Series 54FN	06/26/1980

General Industry/Product Exams

Exam	Category	Date
B Securities Industry Essentials Examination	SIE	01/02/2023
B Operations Professional Examination	Series 99TO	01/02/2023

State Securities Law Exams

Exam	Category	Date
No information reported.		

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/.

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 10/2021 - 01/2023	APIFINY PRIME INC.	304574	NEW YORK, NY
B 05/2020 - 10/2022	RICHARD JAMES & ASSOCIATES, INC.	169131	SYOSSET, NY
B 12/2019 - 05/2022	COVA CAPITAL PARTNERS LLC	109761	SYOSSET, NY
B 08/2021 - 10/2021	APIFINY PRIME INC.	304574	NEW YORK, NY
B 02/2018 - 07/2018	GREENWICH ENERGY CAPITAL ADVISORS	157945	GREENWICH, CT
B 09/2013 - 04/2016	GREENWICH ENERGY CAPITAL ADVISORS	157945	GREENWICH, CT
B 01/2013 - 03/2016	BMI CAPITAL INTERNATIONAL LLC	154670	NEW YORK, NY
B 03/2014 - 02/2016	DAVIS SECURITIES LLC	138829	NEW YORK, NY
B 07/2014 - 01/2016	RICHARD JAMES & ASSOCIATES, INC.	169131	SYOSSET, NY
B 10/2007 - 09/2015	J.D. NICHOLAS & ASSOCIATES, INC.	44791	SYOSSET, NY
B 07/2009 - 08/2015	SAWAYA SEGALAS SECURITIES, LLC	148860	NEW YORK, NY
B 12/2010 - 06/2014	HAMPTON HEDGE FUND MARKETING, LLC	141685	OAKTON, VA
B 10/2010 - 08/2011	WESTBURY GROUP LLC	129985	WESTPORT, CT
B 11/2006 - 08/2009	CGI MERCHANT CAPITAL, LLC	137681	MIAMI, FL
B 10/2007 - 08/2008	CRONUS PARTNERS LLC	133392	SOUTHPORT, CT
B 01/2008 - 06/2008	EVOLUTION MARKETS FINANCIAL SERVICES LLC	140978	WHITE PLAINS, NY
B 01/1989 - 03/2006	W. T. CABE & COMPANY, INC.	6197	WESTPORT, CT
B 12/2005 - 02/2006	EQUITIES TRADING CORP.	16871	NEW YORK, NY
B 01/1999 - 09/2005	SUNGARD INSTITUTIONAL BROKERAGE INC.	8509	GENEVA, IL
B 11/1990 - 12/1998	BCP INC.	27063	GREENWICH, CT
B 12/1995 - 09/1998	J.P.R. CAPITAL CORP.	38056	SYOSSET, NY



Registration and Employment History

Registration History, continued

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
B 03/1990 - 06/1998	SUNGARD INSTITUTIONAL BROKERAGE INC.	8509	
B 05/1988 - 08/1997	SFI INVESTMENTS, INC.	21663	NEW YORK, NY
B 12/1992 - 11/1993	IRC INVESTMENTS INC.	30848	
B 08/1989 - 12/1990	INTEGRATED ASSETS GROUP, INC.	18924	
B 03/1988 - 03/1990	TULLETT & TOKYO SECURITIES, INC.	19595	NEW YORK, NY
B 12/1989 - 02/1990	CASTLETON-RHODES INC.	17137	
B 09/1988 - 09/1989	ROBYNS CAPITAL CORP.	19980	
B 10/1987 - 01/1989	EQUITIES TRADING CORP.	16871	NEW YORK, NY
B 10/1986 - 01/1987	AMFCO SECURITIES, INC.	1045	
B 08/1982 - 01/1985	AMFCO SECURITIES, INC.	1045	
B 07/1980 - 04/1982	EMANUEL AND COMPANY	7309	

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
08/2021 - Present	Apify Prime Inc	FINOP	Y	New York, NY, United States
05/2020 - Present	Richard James & Associates Inc.	FINOP	Y	SYOSSET, NY, United States
12/2019 - Present	Cova Capital Partners LLC	FINOP	Y	SYOSSET, NY, United States
09/2019 - Present	Greenwich Capital Partners	FINOP	Y	Greenwich, CT, United States
10/2012 - Present	HAMPTON HEDGE FUND MARKETING LLC	FINOP	Y	OAKTON, VA, United States



Registration and Employment History

Employment History, continued

Employment	Employer Name	Position	Investment Related	Employer Location
10/2012 - Present	PRETIOSA METALLA LLC	FINOP	Y	HOUSTON, TX, United States
10/2007 - Present	JD NICOLAS & ASSOC.	FINANCIAL PRINCIPAL	Y	SYOSSET, NY, United States
03/2007 - Present	SAWAYA SEGALAS SECURITIES, LLC	CFO / FINOP	Y	NEW YORK, NY, United States
03/1982 - Present	HALPERN & ASSOCIATES, LLC	OTHER - ACCOUNTANT	N	WESTON, CT, United States
10/2012 - 05/2018	GREENWICH ENERGY CAPITAL ADVISORS LLC	FINOP	Y	RIVERSIDE, CT, 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.

HALPERN & ASSOCIATES, LLC, NOT INVESTMENT RELATED, 218 DANBURY ROAD, WILTON, CT 06897. FULL SERVICE ACCOUNTING FIRM, BEGAN 3/1982, OWNER, CPA, FULL TIME WHEN NOT WORKING ON SECURITIES INDUSTRY ASSIGNMENTS.

I'M THE FINANCIAL OPERATIONS PRINCIPAL FOR MULTIPLE FINRA MEMBER FIRMS AND FROM TIME TO TIME, I MAY BECOME ENGAGED BY ANOTHER MEMBER FIRM OR MAY LEAVE AN ENGAGEMENT. AS SUCH, THIS NOTICE ON MY FORM U-4 WILL FULFILL MY REPORTING OBLIGATIONS UNDER RULE 3270 AND THAT THE FIRM HAS ACCESS TO AND WILL BE NOTIFIED VIA THE FINRA CRD SYSTEM ANYTIME MY LICENSE IS PROCESSED BY ANOTHER FIRM OR ANYTIME THAT A U-5 IS ISSUED FOR ME FROM ANOTHER FIRM. ADDITIONALLY, THE FIRM ACKNOWLEDGES THAT IT HAS MADE THE CONSIDERATIONS UNDER 3270 THAT A CUSTOMER OF THE FIRM WOULD NOT BE CONFUSED BY MY ASSOCIATIONS AND THAT MY WORKING WITH MULTIPLE FIRMS DOES NOT INHIBIT MY ABILITIES TO ATTEND TO THE FIRM'S NEEDS.



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	1	5	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 5

Reporting Source:	Regulator
Regulatory Action Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Sanction(s) Sought:	Other: n/a
Date Initiated:	02/23/2015
Docket/Case Number:	3-16399
Employing firm when activity occurred which led to the regulatory action:	Halpern & Associates LLC
Product Type:	No Product
Allegations:	SEC Admin Release 34-74350/Accounting & Auditing Enforcement 3639/February 23, 2015: The Securities and Exchange Commission (Commission) deems it appropriate that public administrative and cease-and-desist proceedings be, and hereby are, instituted against Barbara Halpern and her accounting and auditing firm pursuant to Sections 4C and 21C of the Securities Exchange Act of 1934 (Exchange Act) and Rule 102(e)(1)(ii) of the Commission's Rules of Practice. These proceedings arise out of Halpern and her accounting and auditing firm's improper professional conduct in their audit of a broker-dealer firm's financial statements for the year ended December 31, 2009. Those financial statements were materially inaccurate in that they overstated the firm's assets, because its securities inventory as recorded in its financial statements was based on



erroneous and inflated figures for the size of its positions in certain securities, and understated the firm's liabilities by omitting its liabilities to one of the broker-dealers through which it engaged in proprietary trading. Those errors caused the firm's reported net capital to be overstated by nearly \$5 million, or over 350%. Halpern and her accounting and auditing firm egregiously failed in several ways to adhere to Generally Accepted Auditing Standards (GAAS) and did not detect those errors in their audit of the financial statements. As a result of the conduct, Halpern and her accounting and auditing firm were each a cause of the broker-dealer firm's violations of Section 17 of the Exchange Act and Rule 17a-5(a) thereunder.

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:	02/26/2016
Sanctions Ordered:	Cease and Desist Denial Disgorgement
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?

Monetary Sanction 1 of 1

Monetary Related Sanction: Disgorgement

Total Amount: \$13,000.00

Portion Levied against individual: \$13,000.00

Payment Plan: jointly and severally, plus prejudgment interest

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Regulator Statement

SEC Initial Decision Release No. 939/January 5, 2016: This Initial Decision finds that Halpern and her accounting and auditing firm engaged in improper professional conduct and finds that Halpern and her accounting and auditing firm caused a broker-dealer firm's violation of Section 17 of the Exchange Act and Rule 17a-5(d) thereunder. It is ordered, pursuant to Section 21C of the Exchange Act, that Halpern shall cease and desist from causing any violations or future violations of Section 17(a)(1) of the Exchange Act and Rule 17a-5(d) thereunder. It is further ordered, pursuant to Section 21C(e) of the Exchange Act, that Halpern and her accounting and auditing firm shall disgorge \$13,000, plus prejudgment interest. It is further ordered, pursuant to Rule 102(e)(1)(ii) of the Commission's Rules of



Practice, that Halpern is denied the privilege of appearing or practicing before the Commission as an accountant for one year.

SEC Admin Release 34-77248, IA Release 40-3749 / February 26, 2016:

The initial decision of the administrative law judge has become the final decision of the Commission.

Reporting Source:	Broker
Regulatory Action Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Sanction(s) Sought:	Cease and Desist
Date Initiated:	02/23/2015
Docket/Case Number:	3-16399
Employing firm when activity occurred which led to the regulatory action:	LIGHTHOUSE FINANCIAL GROUP, LLC
Product Type:	Other: 2009 FINANCIAL AUDIT
Allegations:	RESPONDENT IS ALLEGED TO HAVE ENGAGED IN IMPROPER PROFESSIONAL CONDUCT IN VIOLATION OF RULE 102(E)(1)(IV)(B) AND SECTION 4C(B) IN CONNECTION WITH AN AUDIT OF THE 2009 FINANCIAL STATEMENTS OF LIGHTHOUSE FINANCIAL GROUP, LLC (LHFG), A REGISTERED BROKER-DEALER. RESPONDENT IS ALLEGED TO HAVE FAILED TO HAVE EXERCISED DUE CARE IN PLANNING & PERFORMING THE LHFG AUDIT, IN STAFFING AND SUPERVISING THE AUDIT, AND IN NOT EXERCISING PROFESSIONAL SKEPTICISM IN EVALUATING THE QUANTITY AND QUALITY OF AUDIT EVIDENCE. ALSO, RESPONDENT IS ALLEGED TO HAVE FAILED TO HAVE ADHERED TO AUDITING STANDARDS CONCERNING CONFIRMATION, THE RELIABILITY OF AUDIT EVIDENCED AND OTHER ITEMS. THE ALLEGATIONS RELATE PRIMARILY TO THE AUDIT OF LHFG'S INVENTORY POSITIONS AND MONIES DUE FROM ITS CLEARING FIRM.
Current Status:	Final
Resolution:	Decision
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: 01/05/2016

Sanctions Ordered: Cease and Desist
Disgorgement
Suspension

Sanction 1 of 1

Sanction Type: Suspension

Capacities Affected: Financial Operations Principal

Duration: One Year

Start Date: 01/05/2016

End Date: 01/06/2017

Monetary Sanction 1 of 1

Monetary Related Sanction: Disgorgement

Total Amount: \$13,000.00

Portion Levied against individual: \$13,000.00

Payment Plan: Being Negotiated

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Disclosure 2 of 5

Reporting Source: Regulator

Regulatory Action Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.

Sanction(s) Sought: Other: N/A

Date Initiated: 11/14/1997

Docket/Case Number: C10970176



Employing firm when activity occurred which led to the regulatory action:	SFI INVESTMENTS, INC.
Product Type:	No Product
Allegations:	COMPLAINT NO. C10970176 FILED NOVEMBER 14, 1997 BY DISTRICT NO. 10 AGAINST BARBARA DIANE HALPERN, ET AL. ALLEGING VIOLATIONS OF NASD RULES 2110, 2120 AND 3010 AND MSRB RULE G-27 IN THAT A MEBER FIRM, ACTING THROUGH HALPERN AND ANOTHER, CONDUCTED A SECURITIES BUSINESS WHILE FAILING TO MAINTAIN ITS MINIMUM REQUIRED NET CAPITAL.
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:	03/23/1998
Sanctions Ordered:	Censure 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?

Regulator Statement

ON MARCH 23, 1998, THE DECISION AND ORDER OF ACCEPTANCE OF OFFER OF SETTLEMENT SUBMITTED BY RESPONDENT HALPERN WAS ACCEPTED; THEREFORE, SHE IS CENSURED, FINED \$20,000, SUSPENDED FROM ASSOCIATION WITH ANY NASD MEMBER AS A FINANCIAL AND OPERATIONS PRINCIPAL FOR 90 DAYS, AND REQUIRED TO REQUALIFY BY EXAMINATION AS A FINANCIAL AND OPERATIONS PRINCIPAL BEFORE EVER AGAIN FUNCTIONING IN THIS CAPACITY.

THE SUSPENSION WILL COMMENCE WITH THE OPENING OF BUSINESS ON MAY 18, 1998, AND WILL CONCLUDE AT THE CLOSE OF BUSINESS AUGUST 15, 1998. FINE PAID IN FULL ON 6/21/00.

Reporting Source: Firm
Regulatory Action Initiated By: NASD REGULATION INC.
Sanction(s) Sought:
Other Sanction(s) Sought:
Date Initiated: 11/14/1997
Docket/Case Number: C10970176



Employing firm when activity occurred which led to the regulatory action:	SFI INVESTMENTS, INC.
Product Type:	
Other Product Type(s):	
Allegations:	FAILURE TO COMPLY WITH RULE 15C3-1 IN THAT SFI INVESTMENTS, INC. FAILED TO MAINTAIN MINIMUM REQUIRED NET CAPITAL ON FIVE DATES DURING 1995.
Current Status:	Final
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	03/23/1998
Sanctions Ordered:	Censure Monetary/Fine \$20,000.00 Suspension
Other Sanctions Ordered:	
Sanction Details:	BARBARA HALPERN SUBMITTED AN OFFER OF SETTLEMENT PURSUANT TO WHICH SHE WAS CENSURED, FINED \$20,000, SUSPENDED FROM ASSOCIATION WITH ANY NASD MEMBER AS A FINOP FOR 90 DAYS AND REQUIRED TO REQUALIFY BY EXAM AS A FINOP.
Firm Statement	WITHOUT ADMITTING OR DENYING HE ALLEGATIONS, HALPERN CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS THAT A MEMBER FIRM, ACTING THROUGH HALPERN, CONDUCTED A SECURITIES BUSINESS WHILE FAILING TO MAINTAIN THE MINIMUM REQUIRED NET CAPITAL.

Reporting Source:	Broker
Regulatory Action Initiated By:	NASD REGULATION INC.
Sanction(s) Sought:	Suspension Other: FINE
Date Initiated:	11/14/1997
Docket/Case Number:	C10970176



Employing firm when activity occurred which led to the regulatory action:	SFI INVESTMENTS, INC.
Product Type:	Other: RETAIL EQUITY SALES
Allegations:	FAILURE TO COMPLY WITH RULE 15C3-1 IN THAT SFI INVESTMENTS, INC. FAILED TO MAINTAIN MINIMUM REQUIRED NET CAPITAL ON FIVE DATES DURING 1995.
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:	03/23/1998
Sanctions Ordered:	Censure Suspension Other: FINED \$20,000 PLUS 90 DAY SUSPENSION
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	FINANCIAL OPERATIONS PRINCIPAL
Duration:	90 DAYS
Start Date:	11/14/1997
End Date:	02/12/1998
Broker Statement	NOT PROVIDED

Disclosure 3 of 5

Reporting Source:	Regulator
Regulatory Action Initiated By:	NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
Sanction(s) Sought:	
Date Initiated:	10/30/1992



Docket/Case Number: C10920094

Employing firm when activity occurred which led to the regulatory action: SEIDEL & FASANO INC.

Product Type:

Allegations:

Current Status: Final

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/30/1992

Sanctions Ordered: Censure

Regulator Statement ON OCTOBER 30, 1992, THE LETTER OF ACCEPTANCE, WAIVER AND CONSENT NO. C10920094 (DISTRICT NO. 10) SUBMITTED BY BARBARA HALPERN WAS ACCEPTED; THEREFORE, SHE IS CENSURED AND FINED \$3,500, JOINTLY AND SEVERALLY - (ARTICLE III, SECTION 1 OF THE RULES OF FAIR PRACTICE - A MEMBER FIRM, ACTING THROUGH RESPONDENT HALPERN, CONDUCTED A SECURITIES BUSINESS WHILE FAILING TO MAINTAIN ITS REQUIRED MINIMUM NET CAPITAL).

**\$3,500 J&S PAID ON 12/08/92 INVOICE #92-10-977

Reporting Source: Firm

Regulatory Action Initiated By: NASD

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 10/30/1992

Docket/Case Number: C10920094

Employing firm when activity occurred which led to the regulatory action: SEIDEL & FASANO INC.

Product Type:

**Other Product Type(s):**

Allegations: FAILURE TO COMPLY WITH SEC RULE 15C 3-1 IN THAT SFI FAILED TO MAINTAIN MINIMUM REQUIRED NET CAPITAL AS OF DECEMBER 27, 1991.

Current Status: Final

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/30/1992

Sanctions Ordered: Censure
Monetary/Fine \$3,500.00

Other Sanctions Ordered:

Sanction Details: FINED \$3300 JOINT AND SEVERAL

Firm Statement Not Provided

Reporting Source: Broker

Regulatory Action Initiated By: NASD

Sanction(s) Sought:

Date Initiated: 10/30/1992

Docket/Case Number: C10920094

Employing firm when activity occurred which led to the regulatory action: SEIDEL & FASANO INC.

Product Type: Other: RETAIL EQUITY SALES

Allegations: FAILURE TO COMPLY WITH SEC RULE 15C3-1 IN THAT SEIDEL & EASANO FAILED TO MAINTAIN MINIMUM REQUIRED NET CAPITAL AS OF 12/27/91.

Current Status: Final

Resolution: 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:	10/30/1992
Sanctions Ordered:	Censure Other: FINED \$3,500 JOINT AND SEVERAL
Broker Statement	NOT PROVIDED

Disclosure 4 of 5

Reporting Source:	Regulator
Regulatory Action Initiated By:	NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
Sanction(s) Sought:	
Date Initiated:	07/30/1991
Docket/Case Number:	C10910120
Employing firm when activity occurred which led to the regulatory action:	SEIDEL & FASANO, INC
Product Type:	
Allegations:	
Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	07/30/1991
Sanctions Ordered:	Censure
Regulator Statement	ON JULY 30, 1991, THE LETTER OF ACCEPTANCE, WAIVER AND CONSENT C10910120 (DISTRICT NO. 10) SUBMITTED BY BARBARA D. HALPERN WAS ACCEPTED; THEREFORE, SHE IS CENSURED AND FINED \$2,000, JOINTLY AND SEVERALLY - (ARTICLE III, SECTION 1 OF THE RULES OF FAIR PRACTICE - A MEMBER FIRM, ACTING THROUGH RESPONDENT HALPERN CONDUCTED



A SECURITIES BUSINESS WHILE FAILING TO MAINTAIN ITS REQUIRED MINIMUM NET CAPITAL).

\$2,000.00 J&S PAID ON 8/21/91 INVOICE# 91-10-976

Reporting Source: Firm

Regulatory Action Initiated By: NASD

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 07/30/1991

Docket/Case Number: C10910120

Employing firm when activity occurred which led to the regulatory action: SEIDEL & FASANO, INC

Product Type:

Other Product Type(s):

Allegations: FAILURE TO COMPLY WITH SEC RULE 15C 3-1 IN THAT SFI FAILED TO MAINTAIN MINIMUM REQUIRED NET CAPITAL AS OF SEPTEMBER 28, 1990

Current Status: Final

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 07/30/1991

Sanctions Ordered: Censure
Monetary/Fine \$2,000.00

Other Sanctions Ordered:

Sanction Details: FINE \$2,000 JOINT & SEVERAL

Firm Statement Not Provided

Reporting Source: Broker

Regulatory Action Initiated By: NASD

**Sanction(s) Sought:****Date Initiated:** 07/30/1991**Docket/Case Number:** C10910120**Employing firm when activity occurred which led to the regulatory action:** SEIDEL & FASANO, INC**Product Type:** Other: RETAIL EQUITY SALES**Allegations:** FAILURE TO COMPLY WITH SEC RULE 15C3-1 IN THAT SEIDEL & EASANO FAILED TO MAINTAIN MINIMUM REQUIRED NET CAPITAL AS OF SEPTEMBER 28, 1990.**Current Status:** Final**Resolution:** 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:** 07/30/1991**Sanctions Ordered:** Censure
Other: FINE \$2,000 JOINT AND SEVERAL. FIRM PAID**Broker Statement** NOT PROVIDED**Disclosure 5 of 5****Reporting Source:** Regulator**Regulatory Action Initiated By:** NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.**Sanction(s) Sought:****Other Sanction(s) Sought:****Date Initiated:** 11/27/1990**Docket/Case Number:** NY-9065-AWC



Employing firm when activity occurred which led to the regulatory action: HASAN GROWNEY CO, INC.

Product Type:

Other Product Type(s):

Allegations:

Current Status: Final

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 01/15/1991

Sanctions Ordered: Censure
Monetary/Fine \$1,000.00

Other Sanctions Ordered:

Sanction Details:

Regulator Statement

ON NOVEMBER 27, 1990, THE LETTER OF ACCEPTANCE, WAIVER AND CONSENT NO. NY-9065-AWC (DISTRICT NO. 12) SUBMITTED BY RESPONDENTS HASAN GROWNEY CO. INC. AND BARBARA D. HALPERN WAS ACCEPTED; THEREFORE, THEY ARE CENSURED AND FINED \$1,000, JOINTLY AND SEVERALLY - (ARTICLE III, SECTION 1 OF THE RULES OF FAIR PRACTICE - RESPONDENT MEMBER, ACTING THROUGH RESPONDENT HALPERN, FAILED TO MAINTAIN REQUIRED MINIMUM NET CAPITAL WHILE CONDUCTING A SECURITIES BUSINESS).
****\$1,000.00 J&S PAID ON 1/18/91 INVOICE #90-12-1378****

Reporting Source: Firm

Regulatory Action Initiated By: NASD

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 11/27/1990

Docket/Case Number: NY-9065-AWC



Employing firm when activity occurred which led to the regulatory action:	HASAN GROWNEY CO, INC.
Product Type:	
Other Product Type(s):	
Allegations:	FAILURE TO COMPLY WITH SEC RULE 15C 3-1 IN THAT CASTLETON RHODES INC FAILED TO MAINTAIN MINIMUM REQUIRED NET CAPITAL ON DECEMBER 29, 1989.
Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	01/15/1991
Sanctions Ordered:	Censure Monetary/Fine \$1,000.00
Other Sanctions Ordered:	
Sanction Details:	FINE \$1,000 JOINT & SEVERAL
Firm Statement	Not Provided
<hr/>	
Reporting Source:	Broker
Regulatory Action Initiated By:	NASD
Sanction(s) Sought:	
Date Initiated:	11/27/1990
Docket/Case Number:	NY-9065-AWC
Employing firm when activity occurred which led to the regulatory action:	HASAN GROWNEY CO, INC.
Product Type:	Other: RETAIL EQUITY SALES
Allegations:	FAILURE TO COMPLY WITH SEC RULE 15C3-1 IN THAT CASTLETON-RHODES, INC. FAILED TO MAINTAIN MINIMUM REQUIRED NET CAPITAL WHILE CONDUCTING A SECURITIES BUSINESS ON 12/29/89.
Current Status:	Final



Resolution: 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: 01/15/1991

Sanctions Ordered: Censure
Other: FINE - \$1,000 JOINT AND SEVERAL BETWEEN THE FIRM AND BARBARA HALPERN - EACH PAID \$500

Broker Statement NOT PROVIDED



Regulatory - Pending

This type of disclosure event involves a pending formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory agency such as the Securities and Exchange Commission, foreign financial regulatory body) for alleged violations of investment-related rules or regulations.

Disclosure 1 of 1

Reporting Source:	Regulator
Regulatory Action Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Sanction(s) Sought:	Other: n/a
Date Initiated:	03/14/2022
Docket/Case Number:	3-20794
Employing firm when activity occurred which led to the regulatory action:	Halpern & Associates LLC
Product Type:	Other: Private equity fund
Allegations:	<p>The Securities and Exchange Commission (“Commission”) deems it appropriate that public administrative proceedings be, and hereby are, instituted against Halpern & Associates LLC and Barbara Halpern (collectively, “Respondents”) pursuant to Section 4C of the Securities Exchange Act of 1934 (“Exchange Act”) and Rule 102(e)(1)(ii) of the Commission’s Rules of Practice. The Division of Enforcement and the Office of the Chief Accountant allege that these proceedings arise out of Respondents’ improper professional conduct in their 2015 and 2016 audits of private equity fund ACP X, LLP (“ACP X”), an entity controlled by Laurence Allen (“Allen”). Halpern & Associates, LLC was the auditor for several entities owned and controlled by Allen. In 2019, the Office of the New York Attorney General (“NYAG”) charged Allen with defrauding investors in his \$17 million private equity fund, ACP X. Allen invested at least 20% of ACP X’s funds in securities issued by NYPPEX Holdings, LLC (“Holdings”), the owner of a registered broker dealer that Allen also controlled. Halpern was the engagement partner for the audits of ACP X. Halpern approved the issuance of 2015 and 2016 audit reports for ACP X, which were issued in 2017 and 2018 despite having strong indications that Allen’s valuations of Holdings’ securities were speculative, based on inflated revenue projections, and used inconsistent inputs. As a result of the conduct alleged herein, H&A and Halpern failed to adhere to Generally Accepted Accounting Standards in planning and performing the audits of ACP X’s 2015 and 2016 financial statements and preparing the audit reports on those statements. Moreover, those failures occurred in the most critical areas of the audit – the valuation of portfolio assets. Accordingly, H&A and Halpern engaged in improper professional conduct by engaging in at least a single instance of highly</p>



unreasonable or, at a minimum, repeated instances of unreasonable conduct within the meaning of Rule 102(e)(1)(iv)(B). Halpern's improper professional conduct may be attributed to H&A.

Current Status:

Pending

Regulator Statement

In view of the allegations made by the Division of Enforcement and the Office of the Chief Accountant, the Commission deems it necessary and appropriate that public administrative proceedings be instituted to determine whether the allegations set forth herein are true and, in connection therewith, to afford Respondents an opportunity to establish any defenses to such allegations, and determine what, if any, remedial action is necessary and appropriate against Respondents pursuant to Section 4C of the Exchange Act and Rule 102(e) of the Commission's Rules of Practice.

Reporting Source:

Broker

Regulatory Action Initiated By:

UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Sanction(s) Sought:

Other: Not Specified

Date Initiated:

03/14/2022

Docket/Case Number:

3-20794

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

ACP X. LP

Product Type:

Other: Audit

Allegations:

Alleged Unmarkable conduct in performing two audits

Current Status:

Pending

End of Report



This page is intentionally left blank.