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June 23, 2015

**Via Electronic Scan**

Mr. Brent J. Fields  
Secretary  
U.S. Securities and Exchange Commission  
100 F Street, NE  
Washington, D.C. 20549-1090

**Re: In the Matter of the Association of Stephen J. Pocina (CRD # 1786516) with Eroom Securities LLC. (BD # 41257)**

Dear Mr. Fields:

Effective June 9, 2015, and pursuant to the Securities Exchange Act of 1934 (“SEA” or “Exchange Act”) Rule 19h-1(a)(3)(ii) (“Rule 19h-1”), the Financial Industry Regulatory Authority (“FINRA”) hereby gives notification to the United States Securities and Exchange Commission (“SEC” or “the Commission”) of the association of Stephen J. Pocina (“Pocina”) as a General Securities Representative (Series 7) and Institutional Sales Trader with Eroom Securities, LLC (“Eroom” or “the Firm”). On March 27, 2015 the Firm submitted a Membership Continuance Application (“MC-400” or “the Application”) with FINRA’s Department of Registration and Disclosure seeking to permit Pocina’s association with the Firm.<sup>1</sup>

**Pocina’s Disqualifying Event**

Pocina is subject to a statutory disqualification, as that term is defined Section 3(a)(39) of the Exchange Act, as a result of an August 27, 2008 plea of guilty to one count of Failure to Report Accident Involving Death and to one count of Reckless Homicide, both of which are felonies in the state of Illinois.<sup>2</sup> In a statement<sup>3</sup>, Pocina represented that on March 3, 2006,

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<sup>1</sup>See the MC-400 Application, as well as related documents, filed by Eroom Securities LLC on behalf of Stephen J. Pocina, dated March 27, 2015 (attached as Exhibit 1).

<sup>2</sup>See Certified Statement of Conviction/Disposition, in the matter of the People of the State of Illinois vs Stephen Pocina (attached as Exhibit 2).

<sup>3</sup>See Pocina’s statement in regards to his felony conviction, dated March 24, 2015 (attached as Exhibit 3).

he fell asleep behind the wheel of his car while driving home. He further states that his car left the road and struck a building, and that it was later discovered that someone inside of the building suffered a fatal injury. The facts do not indicate that alcohol or drugs were involved. Pursuant to his plea agreement, Pocina received three years of probation and no jail time. His period of probation was terminated on August 27, 2011.<sup>4</sup>

### **Background Information**

#### **Pocina's Proposed Association & Responsibilities**

Eroom proposes that Pocina will work from the Firm's home office, located at 200 South Wacker Drive, Suite 2450, Chicago, Illinois.<sup>5</sup> The Firm represents that Pocina will "function as a registered representative and institutional sales trader by taking orders to execute equity trades for institutional customers."<sup>6</sup> Further, Pocina "will introduce institutional clients to Eroom Securities, and take equity orders for execution only."<sup>7</sup> He will be compensated by commission.<sup>8</sup>

#### **Employment and Registration History**<sup>9</sup>

##### *Employment History*

Pocina has been associated with the following firms, during the following periods:

- |                                       |                 |
|---------------------------------------|-----------------|
| • Eroom                               | 03/15 - Present |
| • BTIG, LLC                           | 10/10 – 10/14   |
| • Hudson Securities, Inc.             | 01/10 – 10/10   |
| • Next Generation Equity Research LLC | 12/06 – 02/10   |
| • Susquehanna Financial Group, LLLP   | 02/04 – 03/06   |
| • Lehman Brothers, Inc.               | 02/01 – 02/04   |
| • Spear, Leeds & Kellogg, L.P.        | 04/00 – 02/01   |

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<sup>4</sup>See Sentencing Order/Supervision – Conditional Discharge – Probation, In the Circuit Court of Cook County, Illinois (attached as Exhibit 4).

<sup>5</sup>See Exhibit 1.

<sup>6</sup>Id.

<sup>7</sup>Id.

<sup>8</sup>Id.

<sup>9</sup>See Central Registration Depository ("CRD") Snapshot and Legacy Employment History for Stephen J. Pocina, CRD # 1786516 (collectively attached as Exhibit 5).

- |                            |               |
|----------------------------|---------------|
| • Warburg Dillon Read, LLC | 08/98 – 03/00 |
| • ABN AMRO Inc.            | 01/97 – 08/98 |
| • The Chicago Corporation  | 03/92 – 01/97 |
| • Troster Singer Corp.     | 04/88 – 03/92 |
| • Spear, Leeds & Kellogg   | 05/88 – 02/92 |
| • Billings Equities, Inc.  | 12/87 – 04/88 |

### *Registration History*<sup>10</sup>

Pocina was first registered in the securities industry as a General Securities Representative (Series 7) in February 1988 and he qualified for the Uniform Securities Agent State Law Exam (Series 63) in April 1988.

### Prior SEA Rule 19h-1 Notices and Notifications

On December 23, 2009, Pocina was approved by FINRA to associate with Next Generation Equity Research LLC (“Next Generation”) pursuant to Rule 19h-1.<sup>11</sup> The SEC approved Pocina’s association with Next Generation on January 20, 2010.<sup>12</sup> He was also approved, by notification pursuant to Rule 19h-1(a)(3)(ii), to associate with Hudson Securities, Inc. as a General Securities Representative/Institutional Sales Trader. The notification was submitted to the Commission by FINRA on April 20, 2010. The Commission acknowledged FINRA’s notification on July 30, 2010.<sup>13</sup>

FINRA also filed a notification with the SEC, on November 24, 2010, approving Pocina’s association with BTIG, LLC pursuant to Rule 19h-1(a)(3)(ii). The Commission acknowledged approval of Pocina’s association with BTIG, LLC on January 19, 2011.<sup>14</sup>

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<sup>10</sup>Id.

<sup>11</sup>See Notice Pursuant to Rule 19h-1, dated December 23, 2009, In the Matter of the Continued Association of Stephen J. Pocina as a General Securities Representative/Institutional Sales Trader with Next Generation, dated December 23, 2009 (attached as Exhibit 6).

<sup>12</sup>See letter from Robert C. Cushmac, of the SEC, to Deborah F. McIlroy, of FINRA’s Office of General Counsel, dated January 20, 2010 (attached as Exhibit 7).

<sup>13</sup>See Notification Pursuant to Rule 19h-1, filed In the Matter of the Association of Stephen J. Pocina as a General Securities Representative/Institutional Sales Trader with Hudson Securities, Inc., dated April 20, 2010, and the SEC’s Acknowledgement letter dated July 30, 2010 (collectively attached as Exhibit 8).

<sup>14</sup>See Notification Pursuant to Rule 19h-1, filed In the Matter of the Association of Stephen J. Pocina as a General Securities Representative/Institutional Sales Trader with BTIG, LLC, dated November 24, 2010 and the SEC’s Acknowledgement letter dated January 19, 2011 (collectively attached as Exhibit 9).

### **Background Information of Eroom Securities, LLC**

Eroom is headquartered in Chicago, Illinois.<sup>15</sup> The Firm has been a FINRA member since July 1997. The Firm is not a member of any other self-regulatory organization.

The Firm represents that it has one Office of Supervisory Jurisdiction (“OSJ”) and no branch offices.<sup>16</sup> The Firm employs 11 registered representatives, 9 registered principals and 13 associated persons as employees.<sup>17</sup>

### **Proposed Supervisors**

#### **Pocina’s Primary Supervisor – Benjy Alan Schwartz (CRD # 5035490)**

Pocina will be supervised, onsite, by Benjy Alan Schwartz (“Schwartz”), a General Securities Principal and the Firm’s President.<sup>18</sup> Schwartz has been employed with Eroom since October 2014.<sup>19</sup> He does not supervise any other individuals.

Schwartz first passed the Uniform Securities Agent State Law Examination (Series 63) in March 2006; he then qualified as General Securities Representative (Series 7) in January 2007; and he later qualified as a General Securities Principal (Series 24) in February 2007.<sup>20</sup>

Schwartz has been associated with the following firms, during the following periods:

- |                                     |                 |
|-------------------------------------|-----------------|
| • Eroom                             | 10/14 - Present |
| • Lightspeed Trading, LLC           | 12/11 – 01/14   |
| • Potamus Trading, LLC              | 08/06 – 03/12   |
| • Terra Nova Financial, LLC         | 10/05 – 09/07   |
| • Greenmoor Trading, LLC            | 06/06 – 02/07   |
| • Greenmoor Capital Management, LLC | 08/05 – 06/06   |

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<sup>15</sup>See Exhibit 1.

<sup>16</sup>Id.

<sup>17</sup>Id.

<sup>18</sup>After filing its MC-400 Application, Eroom amended the application indicating that Schwartz would act as Pocina’s primary supervisor. See email correspondence from Paul Gappa of Eroom Securities to Lorraine Lee of FINRA, dated June 8, 2015 (attached as Exhibit 10).

<sup>19</sup>See CRD Snapshot for Benjy Alan Schwartz, CRD # 5035490 (attached as Exhibit 11).

<sup>20</sup>Id.

Regulatory History – Benjy A. Schwartz

The Chicago Mercantile Exchange (“CME”) has brought two regulatory actions against Schwartz. In 2000, Schwartz was found to have violated CME Rule 515.E (intra-association trading), a minor offense for which he was fined \$5,000.<sup>21</sup> Then, in 2005 pursuant to an Offer of Settlement, the Business Conduct Committee (“Committee”) of the CME found that Schwartz filed NASDAQ-100 future orders during the opening range other than by outcry. Based on his actions, the Committee found that Schwartz violated CME Rule 433.B and in accordance with the settlement offer, he was fined \$7,500 and his CME membership and floor access privileges were suspended for two business days.<sup>22</sup>

Member Regulation is unaware of any other regulatory actions brought against Schwartz.

Pocina’s Alternate Supervisor – Jonathan Ward Brunso (CRD # 5161679)

In Schwartz’ absence, Jonathan Ward Brunso (“Brunso”) will act as Pocina’s alternate supervisor. Brunso also works from the Firm’s home office in Chicago, Illinois.

Brunso was first registered in the securities industry as a General Securities Representative (Series 7) in October 2008. He has also qualified for the following registrations:<sup>23</sup> he passed the Uniform Securities Agent State Law Examination (Series 63) in November 2008; the National Commodities Futures Examination (Series 3) in August 2009; the Equity Trader Examination (Series 55) in May 2009 and the General Securities Principal Examination (Series 24) in July 2014.

Brunso has been associated with the following firms, during the following periods:

- |                                  |                 |
|----------------------------------|-----------------|
| • Eroom                          | 10/14 - Present |
| • Lightspeed Trading, LLC.       | 12/11 – 09/14   |
| • Greenmoor Financial Group, LLC | 09/08 – 12/11   |
| • RBS Greenwich Capital          | 06/07 – 08/07   |
| • Citigroup Global Markets, Inc. | 06/06 – 08/06   |

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<sup>21</sup> See CRD Disclosure Composite # 1535083 (attached as Exhibit 12).

<sup>22</sup> See CRD Disclosure Composite # 1347407 (attached as Exhibit 13).

<sup>23</sup> See CRD snapshot for Jonathan Ward Brunso, CRD # 5161679 (attached as Exhibit 14).

Member Regulation is unaware of any regulatory actions against Brunso.

**Basis for FINRA's Filing of the 19h-1 Notification**

SEA Rule 19h-1(a)(3)(ii) reads:

A notice need not be filed with the Commission pursuant to this rule if. . .

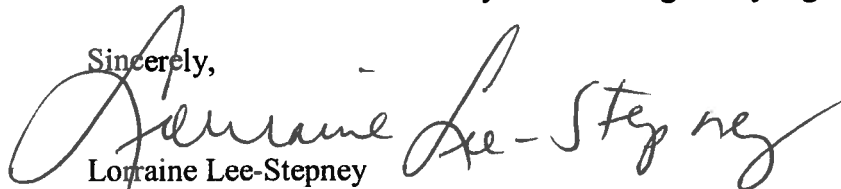
- ii. The self-regulatory organization finds, after reasonable inquiry, that except for the identity of the employer concerned, the terms and conditions of the proposed admission or continuance are the same in all material respects as those imposed or not disapproved in connection with a prior admission or continuance of the person subject to the statutory disqualification pursuant to an order of the Commission under paragraph (d) of this section or other substantially equivalent written communication and that there is no intervening conduct or other circumstance that would cause the employment to be inconsistent with the public interest or the protection of investors;

The Application meets all applicable conditions of this rule. Pursuant to Rule 19h-1, Pocina's association with Eroom, except for the identity of the supervisors and the employing firm, is the same in all material respects as those imposed in his prior Rule 19h-1 approvals. Further, there is no evidence of new or intervening misconduct by Pocina since he was last approved by FINRA in November 2010.

While employed with Eroom, Pocina will be subject to the same plan of heightened supervision as outlined in his prior 19h-1 approval.<sup>24</sup>

FINRA knows of no other conduct or other circumstances that would cause Pocina's association with the Firm to be inconsistent with the public interest or the protection of investors and believes that this form of notification is appropriate. As earlier stated, the Firm is not a member of any other self-regulatory organization.

Sincerely,



Lorraine Lee-Stepney  
Manager, Statutory Disqualification Program  
FINRA

Enclosures

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<sup>24</sup> See Exhibit 6.

Mr. Brent J. Fields  
U.S. Securities and Exchange Commission  
June 23, 2015  
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cc: Daniel M. Sibears (Via Electronic Mail)  
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Special Counsel  
Division of Trading and Markets  
U.S. Securities and Exchange Commission

## Exhibits

1. The MC-400 Application, as well as related documents, filed by Eroom Securities LLC on behalf of Stephen J. Pocina, dated March 27, 2015.
2. Certified Statement of Conviction/Disposition, in the matter of the People of the State of Illinois vs Stephen Pocina.
3. Pocina's statement, dated March 24, 2015.
4. Sentencing Order/Supervision – Conditional Discharge – Probation, In the Circuit Court of Cook County, Illinois.
5. Central Registration Depository ("CRD") Snapshot and Legacy Employment History for Stephen J. Pocina, CRD # 1786516.
6. Notice Pursuant to Rule 19h-1, dated December 23, 2009, In the Matter of the Continued Association of Stephen J. Pocina as a General Securities Representative/Institutional Sales Trader with Next Generation, dated December 23, 2009.
7. Letter from Robert C. Cushmac, of the SEC, to Deborah F. McIlroy, of FINRA's Office of General Counsel, dated January 20, 2010.
8. Notification Pursuant to Rule 19h-1, filed In the Matter of the Association of Stephen J. Pocina as a General Securities Representative/Institutional Sales Trader with Hudson Securities, Inc., dated April 20, 2010, and the SEC's Acknowledgement letter dated July 30, 2010.
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11. CRD Snapshot for Benjamin Alan Schwartz, CRD # 5035490.
12. CRD Disclosure Composite # 1535083.
13. CRD Disclosure Composite # 1347407.
14. CRD snapshot for Jonathan Ward Brunso, CRD # 5161679.