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Disciplinary and Other FINRA Actions

Reported for December 2025

FINRA has taken disciplinary actions against the following firms and individuals for violations of FINRA rules; federal securities laws, rules and regulations; and the rules of the Municipal Securities Rulemaking Board (MSRB).

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Firms Fined

Canaccord Genuity Wealth Management (USA) Inc. (<u>CRD #7449</u>, Vancouver, Canada)

October 1, 2025 - A Letter of Acceptance, Waiver and Consent (AWC) was issued in which the firm was censured and fined \$75,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish, maintain, and enforce a reasonably designed supervisory system and written supervisory procedures (WSPs) to review the securities transactions in its associated persons' disclosed outside brokerage accounts. The findings stated that the firm outsourced its review of associated persons' securities transactions to an affiliate. The affiliate's review was limited to detection of potential insider trading and did not seek to identify other potentially manipulative or deceptive trading, such as trading ahead of firm customers. Moreover, the firm did not have any policies or procedures, or conduct any reviews, to supervise its affiliate's review of its associated persons' brokerage account activity on its behalf. The findings also stated that the firm failed to reasonably conduct required branch office inspections, or reduce inspections to written reports. The firm failed to prepare written reports of any inspections it conducted of six non-supervisory branch offices. Furthermore, for two of those branches, the firm did not retain any records evidencing inspections were conducted and, for the remaining branches, did not maintain documentation evidencing that inspections included testing and verification of all applicable areas of its policies and procedures. The firm also failed to conduct an inspection of its Office of Supervisory Jurisdiction (OSJ) for 2020. The findings also included that the firm failed to conduct annual supervisory control system testing and obtain chief executive officer (CEO) certifications. (FINRA Case # 2022073302501)

Cash App Investing LLC (<u>CRD #144076</u>, Portland, Oregon)

October 1, 2025 – An AWC was issued in which the firm was censured and fined \$375,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings



that it failed to establish and maintain a supervisory system reasonably designed to safeguard customer information. The findings stated that the firm's supervisory system for disabling access credentials for departing employees did not account for its use of a trade reconciliation database that a firm representative designed and built. In addition, the firm did not monitor the trade reconciliation database for unauthorized access. When the representative left the firm, it did not terminate his access to the trade reconciliation system, although it terminated his access to other firm systems. Beginning in October 2021, the firm began to move the trade reconciliation system into its data security infrastructure. However, before the transition was complete, the representative accessed the trade reconciliation system and downloaded reports that contained the names and account numbers for the firm's approximately 8.2 million customers. The reports also contained account value and account holdings for approximately 3.4 million customers. The firm did not detect the representative's unauthorized access of the trade reconciliation system for approximately three months. The firm thereafter immediately terminated the representative's access to the system, followed its cybersecurity incident response policy, promptly notified affected customers and regulators, including FINRA, and took steps to enhance its cybersecurity controls and procedures. FINRA ultimately barred the representative in February 2023. (FINRA Case #2022074570601)

Hoopoe Capital Markets, LLC (CRD #294271, Boston, Massachusetts)

October 2, 2025 – An AWC was issued in which the firm was censured and fined \$20,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to file with FINRA a private placement memorandum or any other offering document used in connection with five private placement offerings sold by its registered representatives. (FINRA Case #2023077073701)

Synovus Securities, Inc. (CRD #14023, Columbus, Georgia)

October 2, 2025 – An AWC was issued in which the firm was censured and fined \$315,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish, maintain, and enforce a reasonably designed supervisory system, including WSPs, concerning forgery and falsification of electronic signatures. The findings stated that the firm permitted personnel to electronically sign documents on behalf of registered representatives in certain limited circumstances without requiring the signer to indicate that they signed on behalf of another. Firm personnel signed another person's signature on at least 500 documents in this manner. The firm later revised its WSPs to prohibit this conduct. In addition, the firm had no system for review of certificates of completion for electronic signatures and had no other controls concerning non-genuine electronic signatures. Further, the firm's WSPs were silent regarding electronic signatures. As a result, the firm failed to detect that associated persons at one branch collectively forged or falsified more than 100 customers' signatures on more than 150 documents. These forgeries and falsifications resulted in the firm maintaining hundreds of inaccurate books and records. Firm operations personnel later discovered this misconduct while processing paperwork originating from the branch. The firm then attempted to contact all affected customers, verified with each customer that the underlying transactions were authorized, and, in many instances, obtained re-executed documents. No customers complained. The firm ultimately implemented a weekly review of certificates of completion for red flags of forgery or falsification, which it memorialized in its WSPs. (FINRA Case #2023080354703)



National Bank of Canada Financial Inc. (CRD #22698, New York, New York)

October 7, 2025 – An AWC was issued in which the firm was censured and fined \$70,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it reported transactions without a mark-up, mark-down, or commission to the Trade Reporting and Compliance Engine (TRACE) without the required "No Remuneration" (NR) indicator. The findings stated that the firm executed off-setting transactions with a firm customer and a firm non-member affiliate at the same price. The firm incorrectly determined the applicability of the NR indicator reporting obligations with respect to these transactions. Because the firm did not receive remuneration for the non-member affiliate trades, it was required to include the NR indicator in its TRACE reports for those transactions. Ultimately, the firm remediated this issue after FINRA made it aware of the applicability of the NR indicator and began to correctly include it. (FINRA Case #2023077507401)

Ally Invest Securities LLC (CRD #136131, Charlotte, North Carolina)

October 8, 2025 - An AWC was issued in which the firm was censured and fined \$850,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to preserve business-related electronic communications with customers. The findings stated that the communications were about trade executions, fund transfers, and other account activity, plus an unknown quantity of internal and external communications from group mailboxes. The firm did not preserve those communications due to separate coding errors and other technical failures in three systems that caused the communications to be lost. As a result of the technical failures, the firm was unable to fully respond to FINRA and Securities and Exchange Commission (SEC) regulatory inquiries. The findings also stated that the firm failed to establish, maintain, and enforce a supervisory system, including WSPs, that were reasonably designed to achieve compliance with its obligation to review business-related electronic communications to and from approximately 120 group mailboxes and a software platform used for customer service communications. The firm's procedures did not require the group mailboxes and all user accounts of the customer-service software to be connected to the firm's system for selecting communications for review, nor did its procedures describe how to verify that the mailboxes and user accounts were connected to the review system. As a result, the firm failed to timely review at least 521,000 such communications. FINRA previously warned the firm about another failure to review business-related electronic communications. (FINRA Case #2021071257201)

EFG Capital International Corp. (CRD #40118, Miami, Florida)

October 9, 2025 – An AWC was issued in which the firm was censured and fined \$650,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish and implement policies and procedures for its anti-money laundering (AML) compliance program that could be reasonably expected to detect and cause the reporting of suspicious transactions. The findings stated that the firm's customers, some of whom the firm designates as high-risk based on their geographic location or other factors, sent and received approximately \$5.5 billion in wire transfers, including transfers involving jurisdictions that the firm designated as having a high-risk of money laundering. The firm's AML policies and procedures required the firm to monitor wire transfers for potentially suspicious activity, including for activity involving high-risk geographic locations and transfers that are unexplained, unusually large or show unusual patterns. However, the firm failed to establish and implement policies and procedures that



could be reasonably expected to detect and cause the reporting of suspicious wire transfers. (<u>FINRA</u> <u>Case #2021069508201</u>)

NexPoint Securities, Inc. (CRD #165013, Dallas, Texas)

October 14, 2025 - An AWC was issued in which the firm was censured, fined \$50,000, and required to comply with the undertaking enumerated in this AWC. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it conducted a securities business while failing to maintain its required net capital. The findings stated that the firm's net capital deficiencies ranged between \$8,511 and \$1,486,435. The deficiencies occurred because the firm misclassified deferred tax assets and federal tax prepayments as liabilities rather than as nonallowable assets. The deficiencies also occurred because the firm misclassified commissions that it was to receive for its registered representatives' sales of the firm's affiliates' mutual fund products as allowable assets rather than as non-allowable assets. These misclassifications caused the firm to incorrectly calculate and overstate its net capital. The findings also stated that the firm failed to maintain accurate books and records, filed inaccurate Financial and Operational Combined Uniform Single (FOCUS) reports with FINRA, and failed to file required notices of its net capital declines with FINRA and the SEC. The aforementioned misclassifications caused the firm to maintain inaccurate net capital calculations and to file 14 FOCUS reports with related net capital and financial inaccuracies. The findings also included that the firm failed to establish, maintain, and enforce a supervisory system, including WSPs, reasonably designed to achieve compliance with net capital and financial reporting rules. The firm's supervisory system and WSPs do not include written guidance, in the WSPs or elsewhere, addressing how net capital computations should be performed. Further, the firm has unreasonably designed supervisory processes and WSPs, despite its historical net capital deficiencies. Finally, the firm has unreasonable processes and procedures to confirm the accuracy of its financial notifications, including for verifying whether it has included all dates on which the firm was net capital deficient. (FINRA Case #2022074391001)

Aegis Capital Corp. (CRD #15007, New York, New York)

October 17, 2025 - An AWC was issued in which the firm was censured, fined \$275,000, and required to comply with the undertaking enumerated in this AWC. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it kept inaccurate books and records by paying several million dollars to its corporate parent and recording those payments as expenses, rather than properly accounting for those payments in net capital computations and FOCUS filings as distributions. The findings stated that although the firm had a written agreement with its corporate parent, the agreement did not adequately specify the management services to be provided. As a result, the firm was required to account for the payments as capital withdrawals, but did not do so in more than a dozen net capital computations—albeit without any change to the firm's net capital—and FOCUS filings. The findings also stated that the firm failed to reasonably supervise the preparation of its books and records. The firm's system, including written procedures, for supervising the preparation of its general ledger, net capital computations, and FOCUS filings was not reasonably designed. The firm did not have any system or procedures for determining whether payments to its corporate parent should be characterized as distributions, rather than expenses. The firm also did not have any system for determining how payments to its corporate parent affected its net capital computations and FOCUS filings. The findings also included that the firm allowed an unregistered person to have a supervisory role in its accounting department. She



was not registered as an Operations Professional even though she had authority to sign checks and withdraw funds from the firm's bank accounts, and she supervised and approved most entries in the firm's general ledger. (FINRA Case #2020068891501)

Alexander Investment Services Co. (CRD #1037, Louisville, Kentucky)

October 20, 2025 – An AWC was issued in which the firm was censured, fined \$25,000, and required to comply with the undertaking enumerated in the AWC. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish and maintain written policies and procedures, and a supervisory system, reasonably designed to achieve compliance with Rule 15l-1(a)(1) under the Securities Exchange Act of 1934 (Reg BI). The findings stated that the firm's written policies and procedures contained no provisions specifically relating to the obligations set forth in Reg BI. The firm updated its policies and procedures, which remain in effect, but they discuss Reg BI only in general terms, without addressing conflicts of interest or Reg BI's specific requirements for acting in the best interest of retail customers. In addition, the firm's WSPs do not designate the principal responsible for Reg BI compliance or detail the supervisory steps and reviews that should be undertaken by that principal, including the frequency of those reviews or how such reviews should be conducted or evidenced. (FINRA Case #2024080211301)

Barclays Capital Inc. (<u>CRD #19714</u>, New York, New York)

October 21, 2025 – An AWC was issued in which the firm was censured and fined \$150,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it served as an underwriter for an Initial Public Offering (IPO) in which it had a conflict of interest, but a qualified independent underwriter did not participate in the preparation of the registration statement and prospectus and exercise the usual standards of due diligence. The findings stated that the firm did not satisfy FINRA Rule 5121(a)(1) because the lead underwriter for the offering also had a conflict and the securities offered were not investment grade rated and did not have a bona fide public market at the time of the offering. (FINRA Case #2022073415002)

J.K. Financial Services, Inc. (CRD #103728, Norco, California)

October 22, 2025 - An AWC was issued in which the firm was censured, fined \$65,000, and required to comply with the undertaking enumerated in this AWC. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it willfully violated Section 17(a)(1) of the Securities Exchange Act of 1934 (Exchange Act) and Exchange Act Rule 17a-14 thereunder by omitting required information on its customer relationship summary (Form CRS). The findings stated that in June 2024, the firm filed a Form CRS that failed to disclose that it had disciplinary history. The document had other errors, including omission of required conversation starters regarding fees and costs and conflicts of interest. The firm did not file a corrected Form CRS until April 2025. The findings also stated that the firm failed to preserve and reasonably supervise email communications. The firm's WSPs did not identify who specifically was responsible for email archiving and review and failed to provide any guidance as to how that review should be conducted. The WSPs lacked details such as the method of review, how the review should be documented and evidenced, the frequency of how often the review should be conducted, how any sample was to be determined, and the issues or content that should be flagged during email review. In December 2021, due to technical problems, the firm's third-party service provider stopped archiving firm emails. The firm did not start archiving its emails again until July 2022. During this period, the firm



was not capturing, archiving, and reviewing any email correspondence for 38 email addresses used for firm business. This resulted in the firm failing to preserve or review an estimated 1,100 emails, some of which related to firm business. In addition, the firm allowed some of its representatives to use outside email addresses for their securities business. The firm did not take any steps to review, retain, and preserve securities business emails sent or received by representatives using their outside email accounts. The findings also included that the firm failed to reasonably supervise outside business activities (OBAs). The firm's WSPs in effect on August 2020 failed to require documentation of the consideration of the factors set forth in FINRA Rule 3270.01. The firm revised its WSPs in October 2022, but until at least May 2024, its WSPs still failed to require documentation of the consideration of the factors in Rule 3270.01. In addition, for a few representatives, the firm failed to document its evaluation of the factors in FINRA Rule 3270.01 after receiving written notice of OBAs from its representatives. FINRA found that the firm failed to establish and maintain written policies and procedures, and a supervisory system, reasonably designed to achieve compliance with the firm's obligations regarding customer investment profiles. (FINRA Case #2021069372901)

Puente Servicios Financieros LLC (CRD #304587, Miami, Florida)

October 23, 2025 – An AWC was issued in which the firm was censured and fined \$20,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to disclose required mark-up and mark-down information on retail customer confirmations. The findings stated that the confirmations failed to disclose both the total dollar amount and percentage of the prevailing market price for the mark-ups and mark-downs charged by the firm. The disclosure failures stemmed from a coding issue. The findings also included that the firm failed to establish, maintain, and enforce a supervisory system, including WSPs, reasonably designed to achieve compliance with FINRA Rule 2232's mark-up and mark-down disclosure requirements. The firm did not have any policies or procedures regarding supervisory reviews of disclosures on retail customer confirmations, and did not conduct any reviews of retail customer confirmations to ensure they included the disclosures required under FINRA Rule 2232(c). (FINRA Case #2023078151401)

Vision Financial Markets LLC (CRD #142271, Stamford, Connecticut)

October 24, 2025 – An AWC was issued in which the firm was censured and fined \$250,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to accurately calculate its required customer reserve and its required reserve for proprietary accounts of broker-dealers (PABs), and failed to maintain a sufficient balance in its customer reserve and PAB reserve accounts. The findings stated that the firm's failure to accurately calculate its customer reserve requirement and maintain a sufficient balance generally occurred because it improperly included certain debits in its reserve formula. The firm's inaccurate calculations on these occasions caused its reserve accounts to be underfunded, resulting in hindsight deficiencies, which generally ranged from \$499,000 to \$7.7 million. The firm improperly calculated its PAB reserve requirement, and, as a result. did not make sufficient deposits into its PAB reserve account, resulting in two hindsight deficiencies of \$2.5 and \$4.1 million, respectively. The findings also stated that the firm created and maintained inaccurate books and records and filed FOCUS reports that inaccurately reflected the firm's customer and PAB reserve obligations. The findings also included that the firm failed to establish and maintain a supervisory system, including



WSPs, reasonably designed to achieve compliance with its reserve obligations. The WSPs failed to address the requirement that a firm calculate its customer reserve based on settled positions and balances in its books and records as of the close of the last business day of the week. The WSPs also did not address how to perform accurate concentrated debit margin computations or how to correctly designate accounts in the firm 's back-office system so as to distinguish between PABs and non-customer accounts for purposes of the PAB reserve computation. Finally, the firm lacked any supervisory process to verify that its weekly customer and PAB reserve computations were accurate and compliant. The firm has since provided information that it had updated its supervisory system, including WSPs, and the firm's customer and PAB reserve obligations. (FINRA Case #2021069322101)

Avenue Securities LLC (CRD #292589, Miami, Florida)

October 27, 2025 - An AWC was issued in which the firm was censured and fined \$100,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it provided customers confirmations for fixed-income transactions with inaccurate markup/mark-down information. The findings stated that these issues affected approximately 44 percent of the firm's fixed income customer confirmations during the period. The findings also stated that the firm failed to establish and maintain a supervisory system reasonably designed to achieve compliance with customer confirmation requirements. The firm relied on a monthly review of a sample of customer confirmations. Prior to March 2024, the firm's WSPs did not specifically require that fixed-income confirmations be included in the review sample, and in practice the firm rarely included them. In March 2024, following inquiries by FINRA, the firm revised its procedures. But the limited sample review in those revised procedures was not reasonably designed to identify inaccurate fixed-income confirmations. In July 2025, the firm remediated these issues by further revising its supervisory procedures. The firm also failed to reasonably investigate after receiving calls from customers questioning the accuracy of the mark-up/mark-down amounts listed on their confirmations for debt securities. Despite these calls, the firm made no changes to how its order management system calculated and reported markup/mark-down amounts on customer confirmations until October 2024, when it corrected the reporting errors. (FINRA Case #2022076239801)

BofA Securities, Inc. (CRD #283942, New York, New York)

October 27, 2025 – An AWC was issued in which the firm was censured and fined a total of \$450,000, of which \$155,000 is payable to FINRA. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish, maintain, and enforce written policies and procedures reasonably designed to prevent trade-throughs of protected quotations in National Market System (NMS) stocks resulting from system issues and assure that its intermarket sweep orders (ISOs) complied with Regulation NMS of the Exchange Act. The findings stated that the firm had systemic latency issues that prevented it from executing simultaneously off-exchange trade-throughs that it reported to FINRA with an Outbound ISO Exception modifier. Instead, they were executed, in limited circumstances, one second or more after ISOs were routed. The intermittent delays were the unintended consequence of the firm's programming choices for two components of its electronic order management systems that the firm had implemented. Because these delays were unintentional and not for the purpose of allowing customers to obtain the benefit of better ISO pricing, the Outbound ISO Exception did not apply to



these trade-throughs. In addition, one of the firm's electronic order management systems ingested and processed market data from the national exchanges for the top eight levels of quotations for each NMS stock displayed by each exchange, as part of the firm's process of taking market snapshots and routing ISOs to protected quotations. If there was no protected quote among the top eight quotations (because of a prevalence of odd lots in the direct market data feeds), the firm's electronic order management system did not route an ISO to that exchange. As a result, the firm executed potential trade-throughs without routing necessary ISOs. Further, a firm trading desk manually executed orders outside of the National Best Bid or Offer (NBBO) price for customer facilitations and manually executed certain position transfers outside the NBBO during market hours, resulting in off-exchange trade-throughs of NMS stocks. The firm then allowed tradethroughs as a result of this manual order execution that did not qualify for a Rule 611(b) exception. The firm also routed ISOs with incorrect FIX tag information from the customer regarding an associated clearing firm, which resulted in exchanges rejecting ISOs. This resulted in the firm executing trade-throughs without routing necessary ISOs. Moreover, the firm did not conduct regular surveillance of its Rule 611 compliance program to detect the above-referenced issues. The findings also stated that the firm failed to establish and maintain a supervisory system, including WSPs, reasonably designed to achieve compliance with Exchange Act Rule 611. The firm's supervision process did not include a system, or written procedures designed to detect and review potential trade-throughs reported with an Outbound ISO Exception modifier without simultaneously routed ISOs. Further, the firm's WSPs did not include specific guidance for supervisors regarding how to review the validity of Exchange Act Rule 611 exception modifiers applied to trade-throughs. In addition, the firm's supervisory system and WSPs were not reasonably designed to detect and review trade-throughs that resulted from the firm's electronic order management system only ingesting and processing market data from the national exchanges for the top eight price levels of quotations for NMS stocks. The firm's supervisory system and WSPs were also not reasonably designed to detect and review manually executed trade-throughs by the firm's trading personnel on one of its trading desks. (FINRA Case #2021071732701)

Independent Financial Group, LLC (<u>CRD #7717</u>, San Diego, California)

October 27, 2025 – An AWC was issued in which the firm was censured and fined \$100,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it permitted a registered representative to continue associating with the firm during the period of his suspension when he was statutorily disqualified. The findings stated that the representative was suspended by FINRA from associating with any FINRA member in all capacities. The AWC instituting the suspension noted that the suspension would make the representative "subject to a statutory disqualification," meaning "he may not be associated with any FINRA member in any capacity, including clerical or ministerial functions, during the period of the ... suspension." However, the firm permitted the representative to continue associating with it by entering securities orders through both the trading desk and electronic system of its clearing firm. (FINRA Case #2023079071301)

CIBC World Markets Corp. (CRD #630, New York, New York)

October 29, 2025 – An AWC was issued in which the firm was censured and fined \$425,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to report, or inaccurately reported, over-the-counter (OTC) options positions to the



Large Options Positions Reporting (LOPR) system. The findings stated that the firm applied LOPR logic that overrode open position reports when reporting new options contracts that were identical to an existing position executed on a prior trading day. Thus, when the firm reported a new options contract that was otherwise identical to a previously reported position, the LOPR only reflected the quantity of the most recent trade, rather than the total aggregate quantity. The firm ultimately revised its LOPR logic to issue records with the correct aggregate quantity for identical contracts. In addition, the firm failed to enter Tax ID numbers when onboarding certain accounts. The firm applied LOPR logic that prevented it from submitting records without all "unique fields," including Tax ID numbers. LOPR-reportable trades for accounts without a Tax ID number were quarantined in an internal queue for further review and escalation. Due to human error, however, the quarantined trades were not reviewed or reported. The firm ultimately added Tax ID numbers to the affected accounts and all LOPR-reportable positions were submitted to the Options Clearing Corporation (OCC). Moreover, the firm inaccurately reported OTC options positions. When the firm made certain amendments in its risk system, it applied LOPR logic that caused certain reportable positions not to be reported. The firm ultimately updated its LOPR logic to remediate this issue. The findings also stated that the firm failed to maintain and enforce a supervisory system, including WSPs, reasonably designed to achieve compliance with FINRA Rule 2360. The firm did not have a supervisory process for ensuring the accuracy and completeness of its LOPR reporting. Further, the firm had no supervisory process to ensure its internal queue of quarantined trades was reviewed to identify and report LOPR-reportable positions. As a result, the firm failed to identify the above inaccuracies in its LOPR reporting for more than six years, and it failed to review and report quarantined transactions missing a Tax ID number for almost two years. The firm has since updated its WSPs to require daily oversight of its internal queue of quarantined trades. The firm also hired an employee to build and manage processes for secondary oversight of LOPR reporting. Furthermore, the firm implemented a new WSP governing daily reconciliation of its LOPR submissions with its trading records to ensure accuracy and completeness in LOPR reporting. (FINRA Case #2022075778501)

Interactive Brokers LLC (CRD #36418, Greenwich, Connecticut)

October 31, 2025 - An AWC was issued in which the firm was censured and fined \$150,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it violated Rule 603(c) of Regulation National Market System (NMS) under the Exchange Act by failing to provide certain of its customers with a consolidated display containing all required market data elements at the point of order entry on its trading platforms. The findings stated that in particular, the firm displayed incomplete market data through its desktop, web-based, and mobile trading platforms to customers who did not pay the firm for real-time market data through a subscription service or by purchasing an on-demand static view of a consolidated display of current market data for a particular stock. Ultimately, the firm began providing all customers with a realtime consolidated display for NMS stocks containing all required market data elements at the point of order entry. The findings also included that the firm failed to establish, maintain, and enforce a supervisory system, including WSPs, reasonably designed to achieve compliance with Rule 603(c) of Regulation NMS (the Vendor Display Rule). The firm had no supervisory system or WSPs from December 2017 through May 2021 and it conducted no reviews of its order entry points for compliance with the Vendor Display Rule. Subsequently, the firm implemented WSPs requiring a review of the order entry points of the firm's trading platforms to determine whether the firm has provided customers with the required consolidated displays. While the firm conducted these



reviews between June 2021 and December 2022, it did not review all order entry points across the firm's trading platforms. Ultimately, the firm identified 22 order entry points that it had not included in its prior reviews and began reviewing all order entry points in its reviews in January 2023. (<u>FINRA Case #2019062038101</u>)

Supreme Alliance LLC (<u>CRD #45348</u>, Charlotte, North Carolina)

October 31, 2025 - An AWC was issued in which the firm was censured and fined \$80,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish and maintain a supervisory system and WSPs reasonably designed to supervise recommendations of purchases and exchanges of deferred variable annuities. The findings stated that the firm failed to establish and maintain a system or WSPs reasonably designed to supervise whether the firm's registered representatives made reasonable efforts to obtain customer profile information and other information needed to reasonably assess the suitability of a transaction and whether those transactions were in the customers' best interests, including customers' risk tolerances and information about lost rider benefits, prior to recommending the purchase or exchange of deferred variable annuities. The firm also did not have a system or procedures sufficient to supervise whether there was a reasonable basis to believe that customers were accurately informed about various features of the deferred variable annuities they were recommended. The firm also failed to document principal review and approval of multiple variable annuity applications submitted. Further, between June 30, 2020, and April 25, 2022, the firm failed to establish, maintain, and enforce written policies and procedures reasonably designed to achieve compliance with Reg BI. Finally, between September 2019 and April 2022, the firm failed to implement surveillance procedures to identify if any of its registered representatives had inappropriate variable annuity exchanges. The firm did not maintain policies or guidance explaining how it would monitor rates of deferred variable annuity exchanges, including who was responsible for such surveillance, how often it would take place, what tools to use to conduct the surveillance, or what parameters to consider when evaluating whether exchange rates were inappropriate. The findings also stated that the firm failed to establish and maintain a supervisory system and WSPs reasonably designed to supervise the firm's investigations, during the hiring process, into the character and reputation of prospective registered representatives, and to maintain records of those investigations. The firm failed to establish and maintain a system reasonably designed to keep appropriate documentation of its investigations at hiring, including records of background checks and disclosure forms required under the firm's procedures. (FINRA Case #2020065125001)

Individuals Barred

Mohammed A. Salim (<u>CRD #7126671</u>, Deer Park, New York)

July 1, 2025 – An AWC was issued in which Salim was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Salim consented to the sanction and to the entry of findings that he refused to appear for on-the-record testimony requested by FINRA in connection with its investigation into the circumstances giving rise to a Uniform Termination Notice for Securities Industry Registration (Form U5) filed by his member firm. The findings stated that the firm filed the Form U5 on Salim's behalf disclosing that it had terminated his registration due to concerns related to unauthorized sales, and funds transfers from a customer's



account to the representative's creditors. Although Salim initially cooperated with FINRA's investigation, he ultimately ceased doing so. (FINRA Case #2024083984501)

Robert David Bienvenu (<u>CRD #7963321</u>, New Orleans, Louisiana)

October 16, 2025 – An AWC was issued in which Bienvenu was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Bienvenu consented to the sanction and to the entry of findings that he refused to produce information and documents requested by FINRA. The findings stated that FINRA issued the request in connection with its investigation into, among other things, Bienvenu's alleged failure to disclose to his member firm certain outside accounts and investments, including investments in purported crypto asset mining companies. (FINRA Case #2024084516401)

David Kitchen Franklin (<u>CRD #5236215</u>, Thornhill, Ontario, Canada)

October 21, 2025 – An AWC was issued in which Franklin was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Franklin consented to the sanction and to the entry of findings that he refused to provide documents and information requested by FINRA as part of its investigation into the allegations in a tip submitted to FINRA and the circumstances giving rise to a Uniform Termination Notice for Securities Industry Registration (Form U5) filed by his member firm. The findings stated that the firm had terminated Franklin's registrations through the firm because he was under criminal indictment. (FINRA Case #2025086279401)

Jose Abel Gamez (<u>CRD #4292479</u>, San Antonio, Texas)

October 23, 2025 – An AWC was issued in which Gamez was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Gamez consented to the sanction and to the entry of findings that he failed to provide information and documents requested by FINRA in connection with its investigation into whether he used customer funds for personal reasons. (FINRA Case #2025086809101)

Jessica Quiroz (<u>CRD #7650265</u>, Staten Island, New York)

October 24, 2025 – An AWC was issued in which Quiroz was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Quiroz consented to the sanction and to the entry of findings that she refused to appear for on-the-record testimony requested by FINRA in connection with its investigation that originated from a tip submitted to FINRA. (FINRA Case #2025084767303)

George Ndifor Jing (CRD #2835725, Laurel, Maryland)

October 30, 2025 – An AWC was issued in which Jing was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Jing consented to the sanction and to the entry of findings that he refused to provide documents and information requested by FINRA in connection with an investigation into whether he participated in an undisclosed OBA or private securities transactions. (FINRA Case #2025086695201)

Eric Brian Kleiner (CRD #4135180, Tenafly, New Jersey)

October 31, 2025 – An AWC was issued in which Kleiner was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Kleiner consented to the



sanction and to the entry of findings that he refused to provide documents and information requested by FINRA during an investigation that originated from its review of the Form U5 filed by his member firm. The finding stated that the Form U5 stated that the firm discharged Kleiner due to concerns related to his recommendation of non-firm approved and firm restricted investments to customers, including ones in which he was also invested, failure to fully disclose outside investment, and use of a personal device to engage in unauthorized disclosure of confidential, internal use only firm information. (FINRA Case #2024084330501)

Individuals Suspended

George John Cairnes (CRD #4068906, Sugar Land, Texas)

October 1, 2025 – An AWC was issued in which Cairnes was assessed a deferred fine of \$2,500 and suspended from association with any FINRA member in all capacities for four months. Without admitting or denying the findings, Cairnes consented to the sanctions and to the entry of findings that he engaged in OBA with a firm customer without providing prior written notice to his member firm. The findings stated that Cairnes incorporated a limited liability company for the activities, and he and the customer worked together to identify, buy, manage, and sell real estate. Cairnes expected to, and did, receive compensation for the OBA. Although Cairnes' real estate business activities were outside the scope of his relationship with his firm, Cairnes did not provide prior notice to the firm of the business activity. In addition, Cairnes falsely stated on firm compliance questionnaires that he was not currently participating in any undisclosed OBAs.

The suspension is in effect from October 6, 2025, through February 5, 2026. (<u>FINRA Case</u> #2023079356701)

William Coppa (CRD #1223438, Brooklyn, New York)

October 1, 2025 – An AWC was issued in which Coppa was fined \$10,000 and suspended from association with any FINRA member in all capacities for six months. Without admitting or denying the findings, Coppa consented to the sanctions and to the entry of findings that he caused his member firm's order memoranda to show an inaccurate representative code by falsifying the representative code for trades in the firm's order entry system. The findings stated that Coppa did not maintain state securities registrations in any of the states in which he entered trades in customer accounts. When Coppa placed the trades on behalf of these customers in the firm's trade entry system, he falsely entered the representative code of another firm representative because the other representative maintained state securities registrations in each of the customers' resident states. Coppa knew that he was not permitted to serve as the registered representative for customers who resided in states in which he was not registered. Coppa received approximately \$209,000 in commissions on these trades.

The suspension is in effect from November 3, 2025, through May 2, 2026. (<u>FINRA Case</u> #2024080232801)

Jeffrey Roy Schuur (<u>CRD #2391965</u>, St. Louis Park, Minnesota)

October 1, 2025 – An AWC was issued in which Schuur was fined \$5,000 and suspended from association with any FINRA member in all capacities for two months. Without admitting or denying



the findings, Schuur consented to the sanctions and to the entry of findings that he recommended seven variable annuity exchanges to customers without a reasonable basis to believe that the transactions were suitable based on the customers' investment profiles and objectives. The findings stated that Schuur failed to reasonably consider the customers' losses of existing benefits from the liquidation of their existing variable annuities. Five of these exchanges depleted the accumulated benefit bases on the customers' living benefit riders or eliminated the rider benefits entirely. The losses of these riders were contrary to these customers' investment goals and financial needs as described in contemporaneous documentation. Two of these exchanges depleted the value of the death benefit in one customer's existing variable annuity, contrary to his stated investment goals.

The suspension is in effect from November 3, 2025, through January 2, 2026. (FINRA Case #2020065145801)

Leah Renee Ruark (CRD #4386482, Jefferson, Georgia)

October 2, 2025 – An AWC was issued in which Ruark was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for three months. Without admitting or denying the findings, Ruark consented to the sanctions and to the entry of findings that she forged and falsified customer signatures. The findings stated that Ruark electronically signed nine documents on behalf of four customers of her member firm without customer permission and electronically signed eight documents on behalf of eight firm customers with customer permission. The documents included required records of the firm. The transactions were authorized and no customers complained.

The suspension is in effect from October 6, 2025, through January 5, 2026. (FINRA Case #2023080354701)

Antaun Cyril Lewis Barnett (CRD #4854743, Weddington, North Carolina)

October 3, 2025 – An AWC was issued in which Barnett was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for six months. Without admitting or denying the findings, Barnett consented to the sanctions and to the entry of findings that he improperly used his member firm's funds. The findings stated that Barnett charged to his firm credit card, and to a firm account at a car service provider, expenses totaling \$4,463.49 that did not comply with the firm's travel and business expense policy. In expense reports that he submitted to the firm, Barnett characterized the expenses as business expenses when, in fact, they were personal in nature. The 15 expenses consisted of hotel stays, meals, and transportation costs that were associated with non-business trips. After Barnett's firm questioned him about the expenses, he offered to reimburse the firm.

The suspension is in effect from October 6, 2025, through April 5, 2026. (<u>FINRA Case</u> #2024081080701)

Timothy Daniel Curran (<u>CRD #2308853</u>, Collierville, Tennessee)

October 7, 2025 – An AWC was issued in which Curran was fined \$5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Curran consented to the sanctions and to the entry of findings that in anticipation of



leaving his member firm for a new firm, he improperly sent confidential and proprietary information from his firm's systems, including nonpublic information about the firm's customers, by emailing it to his personal email address and by printing and retaining documents. The findings stated that this information was directly relevant to Curran's new position, and he accessed some of the information after moving to the new firm. This conduct violated his original firm's policies that Curran agreed to abide by in firm ethics training, in annual compliance questionnaires, and in an employment agreement.

The suspension was in effect from November 3, 2025, through December 2, 2025. (<u>FINRA Case</u> #2023079996901)

Eyan Michael Townsend (<u>CRD #5286707</u>, Hickory, North Carolina)

October 8, 2025 – An AWC was issued in which Townsend was assessed a deferred fine of \$10,000 and suspended from association with any FINRA member in all capacities for one year. Without admitting or denying the findings, Townsend consented to the sanctions and to the entry of findings that he caused his member firm to fail to preserve required books and records by sending unauthorized business-related text messages on his personal cell phone without disclosing his use of text messages to the firm or providing it with copies of the messages. The findings stated that Townsend used the text messages to exchange business-related communications with another associated person at the firm. The findings also stated that during the subsequent firm investigation, Townsend falsely stated to the firm that he had not exchanged business-related text messages with another associated person at the firm. In order to impede the firm's investigation, Townsend deleted the text messages from his cell phone and asked the other associated person to delete the messages from her phone.

The suspension is in effect from October 20, 2025, through October 19, 2026. (FINRA Case #2024082289401)

Brian Michael Moran (CRD #1940341, Matthews, North Carolina)

October 9, 2025 - An AWC was issued in which Moran was fined \$10,000, suspended from association with any FINRA member in a Financial and Operations Principal (FINOP) capacity for three months, and required to requalify by examination as a FINOP prior to acting in that capacity with any FINRA member. Without admitting or denying the findings, Moran consented to the sanctions and to the entry of findings that he allowed his member firm to conduct a securities business while failing to maintain its minimum required net capital and failed to file timely notifications of its net capital deficiencies. The findings stated that Moran, as the firm's FINOP, was responsible for calculating its net capital and filing the firm's FOCUS reports. Moran also had authority to suspend the firm's business operations if its net capital fell below its required minimum. Over a three-month period, the firm's parent approved three corporate resolutions to contribute capital (via debt forgiveness) to the firm. Moran was aware that these resolutions were backdated. Moran approved the firm's net capital computations based on the backdated dates of these resolutions rather than the dates of actual execution, resulting in the incorrect calculation of the firm's net capital. Moran also prepared and filed, on the firm's behalf, inaccurate FOCUS reports that misstated the firm's net capital. Moran was aware that the firm was below its minimum required net capital on 45 days in amounts up to approximately \$2 million, yet permitted the firm to conduct a



securities business during that time. Moran also failed to file any net capital deficiency notifications with FINRA and the SEC when the firm was below its minimum required net capital. Moran filed notifications on behalf of the firm between 51 and 54 days after he became aware of the remaining deficiencies. The findings also stated that Moran caused the firm to inaccurately calculate its customer reserve amounts and not maintain a sufficient balance in its customer reserve account. Moran was responsible for the firm's weekly customer reserve calculation. However, Moran either failed to perform the reserve calculation or performed it incorrectly by treating customer deposits that the firm was waiting to clear as debits. Consequently, Moran caused the firm to fail to maintain a sufficient balance in its reserve account, resulting in deficiencies in amounts up to approximately \$220,000. Moran also caused the firm to misstate its customer reserves on its books and records and to file inaccurate FOCUS reports.

The suspension is in effect from November 3, 2025, through February 2, 2026. (<u>FINRA Case</u> #2022073912801)

Kevin N. Jenkins (CRD #7433172, McKinney, Texas)

October 10, 2025 - An AWC was issued in which Jenkins was suspended from association with any FINRA member in all capacities for 45 days. In light of Jenkins financial status, no monetary sanction has been imposed. Without admitting or denying the findings, Jenkins consented to the sanction and to the entry of findings that he participated in private securities transactions without notice to his member firm and failed to provide notice to the firm that his involvement in an OBA exceeded the scope of an oral disclosure made to it. The findings stated that Jenkins controlled and operated a company that created and published content on social media. That content included discussions of personal finance, economics, and investments and, at times, included recommendations to buy or sell specific securities. In connection with his online business, Jenkins also offered a subscription service for individualized financial advice. From at least August 2021 to February 2023, one firm customer subscribed, and during this time period, lenkins provided recommendations to the customer to buy or sell specific securities. In total, the customer bought or sold securities pursuant to Jenkins' recommendations in more than 75 transactions valued at approximately \$5,000. The findings also stated that in January 2022, shortly after becoming registered, Jenkins orally disclosed to the firm that he had a social media brand but inaccurately described it as involving only financial education. Jenkins did not disclose that it included investment recommendations. Jenkins also completed a firm annual compliance questionnaire, in which he falsely attested that he was not involved in any private securities transactions and did not maintain any OBAs. After the firm raised questions about his activities, Jenkins made a written disclosure to the firm about his online brand, but he did not disclose that it included making investment recommendations. Jenkins continued to create and publish investment-related content, including investment recommendations, until his resignation from the firm.

The suspension is in effect from November 3, 2025, through December 17, 2025. (<u>FINRA Case</u> #2023079170501)

Amy Fulghum (<u>CRD #4805463</u>, Athens, Georgia)

October 13, 2025 – An AWC was issued in which Fulghum was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for six months. Without



admitting or denying the findings, Fulghum consented to the sanctions and to the entry of findings that she forged and falsified customer signatures by electronically signing documents on behalf of nine customers at her member firm without permission and electronically signing documents on behalf of 97 firm customers with permission. The findings stated that the documents included required records of the firm. The transactions were authorized and no customers complained. Fulghum had the mistaken belief that signing customer names was permissible.

The suspension is in effect from October 20, 2025, through April 19, 2026. (FINRA Case #2023080354702)

Brandon V. Spano (<u>CRD #4601257</u>, Saddlebrook, New Jersey)

October 21, 2025 – An AWC was issued in which Spano was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for three months. Without admitting or denying the findings, Spano consented to the sanctions and to the entry of findings that he engaged in an OBA involving acquiring real estate without providing written notice to his member firm. The findings stated that Spano entered into an agreement with a firm customer to invest in real estate. The customer provided \$110,000 to Spano pursuant to that agreement. Spano provided \$340,000. Spano used the funds to purchase real property with the intention of renovating and reselling the property. Thereafter, Spano coordinated renovations to the property, including by himself and third-party contractors. Spano reasonably expected to receive a share of the profits of any resale of the property. Spano's real estate business was outside the scope of his employment with his firm. In addition, Spano falsely attested to the firm in annual compliance questionnaires that he had disclosed to it all OBAs.

The suspension is in effect from November 3, 2025, through February 2, 2026. (<u>FINRA Case</u> #2023080632301)

Jose Luis Centeno (<u>CRD #6368188</u>, Nutley, New Jersey)

October 30, 2025 – Centeno appealed a National Adjudicatory Counsel (NAC) decision to the SEC wherein the NAC modified the findings and affirmed the sanctions imposed by the Office of Hearing Officers (OHO). Centeno was fined \$10,000 and suspended from association with any FINRA member in all capacities for 12 months for entering false information in member firm records to reflect that he had reviewed exception reports when, in fact, he had not reviewed them. The findings stated that Centeno frequently failed to review exception reports when they became available to him, and he often went weeks to months without marking any such reports as reviewed. Later, Centeno would mark reports as reviewed in batches, often at the same time or within minutes of each other. By falsely marking the reports as reviewed, Centeno incorrectly represented to his firm that he had evaluated thousands of transactions for possible manipulative trading or other violations of securities laws. Furthermore, in a hearing during which Centeno testified, he admitted that he falsely marked as reviewed many of the exception reports at issue, and may have only reviewed a couple of the reports. However, he also admitted that he previously testified in an on-the-record testimony that he did not review those reports.

The sanctions are not in effect pending review. (FINRA Case #2020066079903)



John E. Pelletier (<u>CRD #4205289</u>, Hartland, Wisconsin)

October 31, 2025 – A NAC decision became final in which the NAC affirmed the findings and sanctions imposed by the OHO. Pelletier was fined \$10,000 and suspended from association with any FINRA member in all capacities for three months for executing unauthorized transactions in a customer's retirement account. The findings stated that Pelletier enabled distributions at the direction of the customer's ex-wife, who was not an authorized agent. Subsequently, the customers ex-wife nearly depleted the account by spending the funds without the customer's knowledge. Pelletier claimed that the customer gave him oral authorization to accept the ex-wife's trade instructions, however, the NAC found the customer did not grant blanket or any other authorization for his ex-wife to trade in his account.

The suspension is in effect from November 17, 2025, through February 17, 2026. (<u>FINRA Case</u> #2021071094401)



Firm Cancelled for Failure to Pay FINRA Dues, Fees and Other Charges Pursuant to FINRA Rule 9553

Torch Securities, LLC (CRD #133642)

Sugar Land, Texas (October 7, 2025)

Individuals Barred for Failure to Provide Information or Keep Information Current Pursuant to FINRA Rule 9552(h) (If the bar has been vacated, the date follows the bar date.)

Jim Carl Dedmon Jr. (CRD #4498470)

Clovis, California (October 10, 2025) FINRA Case #2024082860601

Jihoon Park (CRD #6535514)

Centreville, Virginia (October 6, 2025) FINRA Case #2024084055701

Frey D. Pena Perez (CRD #7495646)

Bronx, New York (October 10, 2025) FINRA Case #2024083416601

George Stratis (CRD #2985613)

Toronto, Ontario, Canada (October 27, 2025) FINRA Case #2024084277901

Anna Marie Verzosa (CRD #6787085)

Greenwich, Connecticut (October 28, 2025) FINRA Case #2024084451701

Kevin Tong You (CRD #7706430)

Corona, California (October 20, 2025) FINRA Case #2024083676601 Individuals Suspended for Failure to Provide Information or Keep Information Current Pursuant to FINRA Rule 9552(d) (The date the suspension began is listed after the entry. If the suspension has been lifted, the date follows the suspension date.)

Christian Yavier Gomez (CRD #5740603)

Cedar Hill, Texas (October 6, 2025) FINRA Case #2025086269701

Steven A. Pusterla (CRD #6818846)

Hoboken, New Jersey (October 27, 2025) FINRA Case #2024082908501

Richard James Wick (CRD #6248114)

Bigfork, Montana (October 14, 2025) FINRA Case #2025085722701

Individuals Suspended for Failure to Comply with an Arbitration Award or Related Settlement or an Order of Restitution or Settlement Providing for Restitution Pursuant to FINRA Rule Series 9554 (The date the suspension began is listed after the entry. If the suspension has been lifted, the date follows the suspension date.)

Vincent Jerome Camarda (CRD #2463703)

Amityville, New York (October 2, 2025) FINRA Arbitration Case #24-00881

Vincent Jerome Camarda (CRD #2463703)

Amityville, New York (October 6, 2025) FINRA Arbitration Case #24-00880

Vincent Jerome Camarda (CRD #2463703)

Amityville, New York (October 16, 2025) FINRA Arbitration Case #24-01241



Samuel D. Frankfort (CRD #2773755)

Houston, Texas (July 8, 2025 – October 22, 2025) FINRA Arbitration Case #24-01291

Robert James Hoefel (CRD #1508512)

Tacoma, Washington (October 13, 2025) FINRA Arbitration Case #24-01642

James Sunghoon Kim (CRD #4693844)

New York, New York (October 29, 2025) FINRA Arbitration Case #25-00950

Thomas Stewart Lanier (CRD #721214)

Greensboro, North Carolina (October 9, 2025) FINRA Arbitration Case #24-01887

Geraldine Card Maxfield (CRD #1749165)

Montgomery, Texas (October 27, 2025) FINRA Arbitration Case #25-01091

James Edward McArthur (CRD #2797856)

Mount Sinai, New York (October 2, 2025) FINRA Arbitration Case #24-00881

James Edward McArthur (CRD #2797856)

Mount Sinai, New York (October 6, 2025) FINRA Arbitration Case #24-00880

James Edward McArthur (CRD #2797856)

Mount Sinai, New York (October 16, 2025) FINRA Arbitration Case #24-01241

Shane Robert Niederer (CRD #6202734)

Rock Springs, Wyoming (October 16, 2025) FINRA Arbitration Case #23-00807

Krista Ann Stamper (CRD #2549530)

Fairbanks, Alaska (October 10, 2025) FINRA Arbitration Case #23-01593